Iowa Department of Natural Resources Title V Operating Permit

Name of Permitted Facility: Silgan Containers Manufacturing

Corporation – Fort Dodge

Facility Location: 3591 Maple Drive, Fort Dodge, IA 50501

Air Quality Operating Permit Number: 00-TV-035R4

Expiration Date: December 31, 2028

Permit Renewal Application Deadline: June 30, 2028

EIQ Number: 92-4664

Facility File Number: 94-01-040

Responsible Official

Name: William McNish Title: Plant Manager

Mailing Address: 3591 Maple Drive, Fort Dodge IA 50501

Phone #: 515-955-1454 x7421

Permit Contact Person for the Facility

Name: Mike Huff

Title: Environmental Engineer

Mailing Address: 3591 Maple Drive, Fort Dodge IA 50501

Phone #: 903-782-1263

This permit is issued in accordance with 567 Iowa Administrative Code Chapter 22, and is issued subject to the terms and conditions contained in this permit.

For the Director of the Department of Natural Resources

Mainil Steir

Marnie Stein, Supervisor of Air Operating Permits Section

Table of Contents

I.	Facility Description and Equipment List4
II.	Plant - Wide Conditions9
Ш	Emission Point Specific Conditions14
IV.	General Conditions94
	G1. Duty to Comply
	G2. Permit Expiration
	G3. Certification Requirement for Title V Related Documents
	G4. Annual Compliance Certification
	G5. Semi-Annual Monitoring Report
	G6. Annual Fee
	G7. Inspection of Premises, Records, Equipment, Methods and Discharges
	G8. Duty to Provide Information
	G9. General Maintenance and Repair Duties
	G10. Recordkeeping Requirements for Compliance Monitoring
	G11. Evidence used in establishing that a violation has or is occurring.
	G12. Prevention of Accidental Release: Risk Management Plan Notification and
	Compliance Certification
	G13. Hazardous Release
	G14. Excess Emissions and Excess Emissions Reporting Requirements
	G15. Permit Deviation Reporting Requirements
	G16. Notification Requirements for Sources That Become Subject to NSPS and NESHAP
	Regulations C. M. Ling Change Francis Communication of the Property of the Pro
	G17. Requirements for Making Changes to Emission Sources That Do Not Require Title V
	Permit Modification
	G18. Duty to Modify a Title V Permit
	G19. Duty to Obtain Construction Permits
	G20. Asbestos
	G21. Open Burning
	G22. Acid Rain (Title IV) Emissions Allowances G23. Stretagnham Orang and Climate Protection (Title VI) Requirements
	G23. Stratospheric Ozone and Climate Protection (Title VI) Requirements G24. Permit Reopenings
	G25. Permit Shield
	G26. Severability
	G27. Property Rights
	G28. Transferability
	G29. Disclaimer
	G30. Notification and Reporting Requirements for Stack Tests or Monitor Certification
	G30. Notification and Reporting Requirements for Stack Tests of Monitor Certification G31. Prevention of Air Pollution Emergency Episodes
	G32. Contacts List

Abbreviations

	actual cubic feet per minute
	Code of Federal Regulation
CE	control equipment
CEM	continuous emission monitor
°F	degrees Fahrenheit
	emissions inventory questionnaire
EP	emission point
EU	
gr/dscf	grains per dry standard cubic foot
ĪAC	Iowa Administrative Code
IDNR	Iowa Department of Natural Resources
MVAC	motor vehicle air conditioner
NAICS	North American Industry Classification System
NSPS	new source performance standard
ppmv	parts per million by volume
lb/hr	pounds per hour
lb/MMBtu	pounds per million British thermal units
SCC	Source Classification Codes
scfm	standard cubic feet per minute
SIC	Standard Industrial Classification
TPY	tons per year
	United States Environmental Protection Agency
Pollutants	
PM	particulate matter
	particulate matter ten microns or less in diameter
SO ₂	
NO _x	
	volatile organic compound
CO	
	hazardous air pollutant
	•

I. Facility Description and Equipment List

Facility Name: Silgan Containers Manufacturing Corporation – Fort Dodge

Permit Number: 00-TV-035R4

Facility Description: Metal Can and Ends Manufacturing (SIC 3411 – NAICS 332431)

Equipment List

Emission Point ID	Emission Unit ID	Emission Unit Description	DNR Construction Permit
	Liner 10	Line 211 End Compound Liner 10	
	Liner 11	Line 211 End Compound Liner 11	
EP 101	Liner 12	Line 211 End Compound Liner 12	05-A-263-S2
EF 101	Mister 10	Line 211 Mist Spray Applicator 10	03-A-203-S2
	Mister 11	Line 211 Mist Spray Applicator 11	
	Mister 12	Line 211 Mist Spray Applicator 12	
	Liner 15	300 Full Panel Easy Open (FPEO) End Compound Liner 15	
	Liner 16	300 Full Panel Easy Open (FPEO) End Compound Liner 16	
EP 102	Liner 17	300 Full Panel Easy Open (FPEO) End Compound Liner 17	07-A-1001
EP 102	Mister 15	300 Full Panel Easy Open (FPEO) Mist Spray Applicator 15	0/-A-1001
	Mister 16	300 Full Panel Easy Open (FPEO) Mist Spray Applicator 16	
	Mister 17	300 Full Panel Easy Open (FPEO) Mist Spray Applicator 17	
	Liner 5	Line 307 End Compound Liner 5	
	Liner 6	Line 307 End Compound Liner 6	
	Liner 7	Line 307 End Compound Liner 7	
EP 200	Liner 8	Line 307 End Compound Liner 8	06 4 1250 011
EP 200	Mister 5	Line 307 Mist Spray Applicator 5	96-A-1258-S11
	Mister 6	Line 307 Mist Spray Applicator 6	
	Mister 7	Line 307 Mist Spray Applicator 7	
	Mister 8	Line 307 Mist Spray Applicator 8	
EP 700	EU 700*	Scrap Tab Slugs Collection – Process Stack Emissions	00-A-551-S4
EP 701A	E11701*	Pneumatically Conveyed Scrap Aluminum Skeletons	00-A-552-S4
EP 701B	EU 701*	Collection	07-A-1036-S3
EP 702A	E11.702*	Scrap Steel Skeletons Collection – Process Stack	03-A-703-S2
EP 702B	EU 702*	Emissions	07-A-1037-S1
EP 703	EU 703*	Scrap Steel Tab Slug Collection – Process Stack Emissions	07-A-1002-S2
EP 800	EU 800*	Line 211 Post Repair Spray Application – Process Stack Emissions	02-A-332-S3
	EU 801	Ship and Shore Thermal Oxidizer for 211 Line	
EP 805	EU 805*	300 Line and 307 Line	07-A-1003-S5
EP 900	EU 900	Spam Oven Drying Line 1 – Process Stack Emissions	09-A-514-S3

^{*}See Tables below EF Table for listing of all sources associated with these Emission Units

Emission Point ID	Emission Unit ID	Emission Unit Description	DNR Construction Permit	
	EU 400	Clean up Operations		
EF 1	EU 500	Videojet Ink Marking – Process Fugitive Emissions	05-A-259-S1	
	EU 600	Natural Gas Fired Equipment		
	Liner 1	Stolle Rotary End Compound Liner No. 1		
	Liner 2	Stolle Rotary End Compound Liner No. 2		
	Liner 5	End Compound Liner 5		
	Liner 6	End Compound Liner 6		
	Liner 7	End Compound Liner 7		
	Liner 8	End Compound Liner 8		
	Liner 20	Rotary End Compound Liner 20		
	Liner 21	End Compound Liner 21		
	Liner 22	End Compound Liner 22		
	Mister 5	Mist Spray Applicator 5		
	Mister 6	Mist Spray Applicator 6		
	Mister 7	Mist Spray Applicator 7		
EF 2	Mister 8	Mist Spray Applicator 8	05-A-260-S7	
	Mister 20	Mist Spray Applicator 20		
	Mister 21	Mist Spray Applicator 21		
	Mister 22	Mist Spray Applicator 22		
	CP 4	307 Line Burhke Conversion Press 4		
	CP 5	307 Line Stolle Conversion Press 5		
	CP 6	307 Line Stolle Conversion Press 6		
	CP 7	307 Line Stolle 4-out Conversion Press 7		
	CP 8	307 Line Conversion Press		
	CP 20	Spam Conversion Press 20		
	EU 400	Clean up Operations		
	EU 501	Video Ink Jet Marking 307 Line	7	
	EU 600	All Natural Gas Heating EF 1 – EF 9 (20.61 MMBtu/hr)		
	CP 10, CP	211 Line Tab Lubricant Application, - Process Fugitive		
	11	Emissions		
EF 5	EU 400	Clean up Operations	05-A-051	
Er J	EU 502	Video Ink Marking – Process Fugitive Emissions		
	EU 600	All Natural Gas Heating EF 1 – EF 9 (20.61 MMBtu/hr)		
	Liner 10	End Compound Liner 10		
	Liner 11	End Compound Liner 11		
	Liner 12	End Compound Liner 12		
	Mister 10	Mist Spray Applicator 10		
EF 6	Mister 11	Mist Spray Applicator 11	05-A-262-S2	
	Mister 12	Mist Spray Applicator 12	_	
	EU 400	Clean up Operations		
	EU 502	Video Ink Marking – Process Fugitive Emissions	\dashv	
EF 9	CP 22	300 Line Stolle Conversion Press 22 300 Line Stolle Conversion Press 23	O7 A 1000 S2	
EF 9	CP 23 Liner 15		07-A-1000-S2	
	Liner 13	300 Line End Compound Liner 15		

Emission Point ID	Emission Unit ID	Emission Unit Description	DNR Construction Permit
	Liner 16	300 Line End Compound Liner 16	
	Liner 17	300 Line End Compound Liner 17	
	Mister 15	300 Line Mist Spray Applicator 15	
	Mister 16	300 Line Mist Spray Applicator 16	
	Mister 17	300 Line Mist Spray Applicator 17	
	EU 400	Clean up Operations	
	EU 502	300 Line Bagger Video Jet Marking Device	
	EU 503	300 Line Video Jet Ink Marking (12 units)	
	EU 600	All Natural Gas Heating EF 1 – EF 9 (20.61 MMBtu/hr)	

Major	Sub-		DNR
Emission	Emission	Emission Unit Description	Construction
Unit ID	Unit ID		Permit(s)
	CP 4	Burhke Conversion Press 4	
	CP 5	Stolle Conversion Press 5	
	CP 6	Stolle Conversion Press 6	
EU 700*	CP 7	Stolle Conversion Press 7	
Includes	CP 10	DRT Conversion Press 10	00-A-551-S4
includes	CP 11	DRT Conversion Press 11	
	CP 20	Spam Conversion Press 20	
	CP 22	Stolle Conversion Press 22	
	CP 23	Stolle Conversion Press 23	
	T 1	DRD Can Line 1 Trimmers	
	T 2	DRD Can Line 2 Trimmers	
	SP 1	EL II 307 End Size Shell Press	
	SP 17	Spam Shell Press 17	
	SP 25	307 End Shell Press	
	SP 26	Stolle Shell Press 26	
	SP 27	Bliss Shell Press 27	
EU 701*	CP 4	Burhke Conversion Press 4	00-A-552-S4
Includes	CP 5	Stolle Conversion Press 5	00-A-332-84 07-A-1036-S3
includes	CP 6	Stolle Conversion Press 6	0/-A-1030-83
	CP 7	Stolle Conversion Press 7	
	CP 8	Conversion Press	
	CP 10	DRT Conversion Press 10	
	CP 11	DRT Conversion Press 11	
	CP 20	Spam Conversion Press 20	
	CP 22	Stolle Conversion Press 22	
	CP 23	Stolle Conversion Press 23	
	SP 9	211 End Size Sig Shell Press	
	SP 21	300 End Size Sig Shell Press	
EU 702*	CP 10	DRT Conversion Press 10	00-A-552-S4
Includes	CP 11	DRT Conversion Press 11	07-A-1036-S2
	CP 22	Stolle Conversion Press 22	
	CP 23	Stolle Conversion Press 23	
	CP 10	DRT Conversion Press 10	00-A-552-S4

Major Emission Unit ID	Sub- Emission Unit ID	Emission Unit Description	DNR Construction Permit(s)
EU 703*	CP 11	DRT Conversion Press 11	07-A-1002-S2
Includes	CP 22	Stolle Conversion Press 22	
includes	CP 23	Stolle Conversion Press 23	
	SC 1	211 End Line Post Repair Spray Coater #1	
	SC 2	211 End Line Post Repair Spray Coater #2	
	SC 3	211 End Line Post Repair Spray Coater #3	
	SC 4	211 End Line Post Repair Spray Coater #4	
EU 800*	SC 5	211 End Line Post Repair Spray Coater #5	02-A-332-S3
Includes	CO 1	211 End Line Post Repair Curing Oven #1	- 02-A-332-33
	CO 2	211 End Line Post Repair Curing Oven #2	
	CO 3	211 End Line Post Repair Curing Oven #3	
	CO 4	211 End Line Post Repair Curing Oven #4	
	CO 5	211 End Line Post Repair Curing Oven #5	
	Liner 1	307 Line Stolle Rotary End Compound Liner 1	
	Liner 2	307 Line Stolle Rotary End Compound Liner 2	
	Liner 5	End Compound Liner 5	
	Liner 6	End Compound Liner 6	
	Liner 7	End Compound Liner 7	
	Liner 8	End Compound Liner 8	
	Liner 15	300 Line End Compound Liner 15	
	Liner 16	300 Line End Compound Liner 16	
	Liner 17	300 Line End Compound Liner 17	
	Liner 20	Rotary End Compound Liner 20	
	Liner 21	307 Line End Compound Liner 21	
	Liner 22	307 Line End Compound Liner 22	
	Mister 5	Mist Spray Applicator 5	
	Mister 6	Mist Spray Applicator 6	
	Mister 7	Mist Spray Applicator 7	
EU 805*	Mister 8	Mist Spray Applicator 8	00-A-552-S4
Includes	Mister 15	300 Line Mist Spray Applicator 15	00-A-332-34 07-A-1003-S5
includes	Mister 16	300 Line Mist Spray Applicator 16	07-A-1003-33
	Mister 17	300 Line Mist Spray Applicator 17	
	Mister 20	Mist Spray Applicator 20	
	Mister 21	307 Line Mist Spray Applicator 21	
	Mister 22	307 Line Mist Spray Applicator 22	
	CP 4	Burhke Conversion Press 4	
	CP 5	Stolle Conversion Press 5	
	CP 6	Stolle Conversion Press 6	
	CP 7	Stolle 4-out Conversion Press 7	
	CP 8	Conversion Press	
	CP 20	Spam Conversion Press 20	
	CP 22	Stolle Conversion Press 22	
	CP 23	Stolle Conversion Press 23	
	EU 400	Clean up Operations	
	EU 503	Video Jet Ink Marking (12 units)	
	EU 600	Natural Gas-Fired Equipment	

Insignificant Activities Equipment List(1)

Insignificant Emission Unit Number	Insignificant Emission Unit Description
Compound Tank	7,800 Gallon End Sealing Compound Storage Tank
Day Tank	500 Gallon End Sealing Compound Day Tank
Bulk Lube Tank	7,000 Gallon Bulk Lube Storage Tank
Solvent Tank 1	250 Gallon Solvent Storage Tank #1
Solvent Tank 2	500 Gallon Tab Lube Storage Tank
Solvent Tank 3	250 Gallon Solvent Storage Tank #3
EU 600	Natural Gas Fired Equipment
RS Part A Tank	500 Gallon Repair Spray Part A Tank
RS Part B Tank	500 Gallon Repair Spray Part B Tank

 $^{^{(1)}}$ The VOC emissions from the tanks in the insignificant equipment list are accounted for through the emission point(s) they are used by.

II. Plant-Wide Conditions

Facility Name: Silgan Containers Manufacturing Corporation – Fort Dodge

Permit Number: 00-TV-035R4

Permit conditions are established in accord with 567 Iowa Administrative Code rule 22.108

Permit Duration

The term of this permit is: Five (5) years Commencing on: December 28, 2023 Ending on: December 27, 2028

Amendments, modifications and reopenings of the permit shall be obtained in accordance with 567 Iowa Administrative Code rules 22.110 - 22.114. Permits may be suspended, terminated, or revoked as specified in 567 Iowa Administrative Code Rules 22.115.

Plant-Wide Emission Limits

Unless specified otherwise in the Source Specific Conditions, the following limitations and supporting regulations apply to all emission points at this plant:

Pollutant: Volatile Organic Compounds (VOC)

Emission Rate (tons/yr.): 410⁽¹⁾

Authority for Requirement: DNR Construction Permits 05-A-263-S2, 07-A-1001, 96-A-1258-S11, 00-A-552-S4, 07-A-1036-S3, 03-A-703-S2, 07-A-1037-S1, 02-A-332-S3, 07-A-1003-S5, 09-A-514-S3, 05-A-259-S1, 05-A-260-S7, 05-A-261-S1,

05-A-262-S2, 07-A-1000-S2

⁽¹⁾Plant-wide limit established to restrict potential VOC emissions from Silgan Containers Manufacturing (Plant No. 94-01-040). Plant-wide VOC limit encompasses all sources of VOC emissions from Silgan Containers.

Pollutant: Any Individual Hazardous Air Pollutant (HAP)

Emission Rate (tons/yr.): 9.4⁽²⁾

Authority for Requirement: DNR Construction Permits 05-A-263-S2, 07-A-1001, 96-A-1258-S11, 00-A-552-S4, 07-A-1036-S3, 03-A-703-S2, 07-A-1037-S1, 02-A-332-S3, 07-A-1003-S5, 09-A-514-S3, 05-A-259-S1, 05-A-260-S7, 05-A-261-S1,

05-A-262-S2, 07-A-1000-S2

Pollutant: Total Hazardous Air Pollutants (HAP)

Emission Rate (tons/yr.): 24.4⁽²⁾

Authority for Requirement: DNR Construction Permits 05-A-263-S2, 07-A-1001,

96-A-1258-S11, 00-A-552-S4, 07-A-1036-S3, 03-A-703-S2, 07-A-1037-S1, 02-A-332-S3,

07-A-1003-S5, 09-A-514-S3, 05-A-259-S1, 05-A-260-S7, 05-A-261-S1,

05-A-262-S2, 07-A-1000-S2

(2) The Plant-wide HAP limits of 9.4 Tons per year (individual)/24.4 Tons per year (total) encompasses all sources of HAP emissions from Silgan Containers.

Plant-Wide Operating Condition Monitoring

Records shall be kept on-site for at least five (5) years and shall be available for inspection by the Department. Records shall be maintained in a legible and orderly manner and shall indicate the following:

- A) EP 101, EP 102, EP 200, EP 701A, EP 701B, EP 800, EP 805, EP 900, EP EF 1 EP EF 2, EP EF 5, EF 6, EF 9
 - (1) Record daily, the identification and amount of all VOC/HAP containing material used at Silgan Containers Manufacturing, Plant No. 94-01-040 (including end seal compound liners, mist applicators, conversion presses, post repair spray applications, videojet printers, clean up operations, etc.), in gallons. The amount of VOC/HAP containing material used shall be determined either by direct measurement or shall be determined by the daily production rates of can ends and tabs. If the amount is determined by production rates, the permittee shall maintain records on the amount of can ends and tabs produced daily and the application rates of VOC/HAP containing material per can end and tab.
 - (2) Record the VOC content of all VOC/HAP containing material used at Silgan Containers Manufacturing, Plant No. 94-01-040, in pounds per gallon.
 - (3) Record the individual HAP content of all VOC/HAP containing material used at Silgan Containers Manufacturing, Plant No. 94-01-040, in pounds per gallon.
 - (4) Record the total HAP content of all VOC/HAP containing material used at Silgan Containers Manufacturing, Plant No. 94-01-040 in pounds per gallon.
 - (5) Retain Material Safety Data Sheets (MSDS) for VOC/HAP containing materials used at Silgan Containers Manufacturing, Plant No. 94-01-040.
- B) EP 101, EP 200, EP 701A, EP 701B, EP 805, EP 900, EP EF 1, EP EF 2, EP EF 5 EP EF 6, EP EF 9
 - (1) Calculate total VOC emissions in tons from Silgan Containers Manufacturing, Plant No. 94-01-040 on a monthly basis and keep rolling 12-month totals. Records for total VOC emissions shall be kept on monthly basis until time that total VOC emissions exceed 328 tons per year. At this point owner or operator shall immediately begin keeping a 365-day rolling total of the quantity of total VOC emissions emitted from Silgan Containers Manufacturing, Plant No. 94-01-040 in tons. Calculation requirements will revert back to a monthly basis if the 365-day rolling total is returned below 328 tons per year for total VOC emissions. Note, total VOC emission recording requirements encompass all sources of VOC emissions from Silgan Containers Manufacturing, Plant No. 94-01-040.
 - a. In determining total VOC, individual HAP and Total HAP emissions from the emission points listed above, owner and operator shall assume 98 percent of the

- VOC/HAP containing material used in the emission units is destroyed in the RTO.
- b. In determining total VOC, individual HAP and Total HAP emissions from the emission points listed above, owner and operator shall assume 98 percent of the VOC/HAP containing material used in the emission units is destroyed in the RTO.
- (2) Calculate Single HAP emissions in tons from Silgan Containers Manufacturing, Plant No. 94-01-040 on a monthly basis and keep rolling 12-month totals. Records for Single HAP emissions shall be kept on monthly basis until time that Single HAP emissions exceed 7.5 tons per year. At this point owner or operator shall immediately begin keeping a 365-day rolling total of the quantity of Single HAP emissions emitted from Silgan Containers Manufacturing, Plant No. 94-01-040 in tons. Calculation requirements will revert back to a monthly basis if the 365-day rolling total is returned below 7.5 tons per year for Single HAP emissions. Note, Single HAP emission recording requirements encompass all sources of Single HAP emissions from Silgan Containers Manufacturing, Plant No. 94-01-040.
 - a. See Section B)(1)a above
 - b. See Section B)(1)b above
- (3) Calculate total HAP emissions in tons from Silgan Containers Manufacturing, Plant No. 94-01-040 on a monthly basis and keep rolling 12-month totals. Records for total HAP emissions shall be kept on monthly basis until time that total HAP emissions exceed 20.0 tons per year. At this point owner or operator shall immediately begin keeping a 365-day rolling total of the quantity of total HAP emissions emitted from Silgan Containers Manufacturing, Plant No. 94-01-040 in tons. Calculation requirements will revert back to a monthly basis if the 365-day rolling total is returned below 20.0 tons per year for total HAP emissions. Note, total HAP emission recording requirements encompass all sources of total HAP emissions from Silgan Containers Manufacturing, Plant No. 94-01-040.
 - a. See Section B)(1)a above
 - b. See Section B)(1)b above

C) EP 102, EP 800, EF 1, EF 5

- (1) Calculate total VOC emissions in tons from Silgan Containers Manufacturing, Plant No. 94-01-040 on a monthly basis and keep rolling 12-month totals. Records for total VOC emissions shall be kept on monthly basis until time that total VOC emissions exceed 350 tons per year. At this point owner or operator shall immediately begin keeping a 365-day rolling total of the quantity of total VOC emissions emitted from Silgan Containers Manufacturing, Plant No. 94-01-040 in tons. Calculation requirements will revert back to a monthly basis if the 365-day rolling total is returned below 350 tons per year for total VOC emissions. Note, total VOC emission recording requirements encompass all sources of VOC emissions from Silgan Containers Manufacturing, Plant No. 94-01-040.
 - a. In determining total VOC, individual HAP and Total HAP emissions from the emission points listed above, owner and operator shall assume 98 percent of the VOC/HAP containing material used in the 300 Line Post Repair Spray Application is destroyed in the RTO.

- b. In determining total VOC, individual HAP and Total HAP emissions from emission points listed above, owner and operator shall assume 98 percent of the VOC/HAP containing material used in the 211 Line Post Repair Spray Application is destroyed in the RTO.
- (2) Calculate Single HAP emissions in tons from Silgan Containers Manufacturing, Plant No. 94-01-040 on a monthly basis and keep rolling 12-month totals. Records for Single HAP emissions shall be kept on monthly basis until time that Single HAP emissions exceed 8.0 tons per year. At this point owner or operator shall immediately begin keeping a 365-day rolling total of the quantity of Single HAP emissions emitted from Silgan Containers Manufacturing, Plant No. 94-01-040 in tons. Calculation requirements will revert back to a monthly basis if the 365-day rolling total is returned below 8.0 tons per year for Single HAP emissions. Note, Single HAP emission recording requirements encompass all sources of Single HAP emissions from Silgan Containers Manufacturing, Plant No. 94-01-040.
 - a. See Section C)(1)a above
 - b. See Section C)(1)b above
- (3) Calculate total HAP emissions in tons from Silgan Containers Manufacturing, Plant No. 94-01-040 on a monthly basis and keep rolling 12-month totals. Records for total HAP emissions shall be kept on monthly basis until time that total HAP emissions exceed 20.70 tons per year. At this point owner or operator shall immediately begin keeping a 365-day rolling total of the quantity of total HAP emissions emitted from Silgan Containers Manufacturing, Plant No. 94-01-040 in tons. Calculation requirements will revert back to a monthly basis if the 365-day rolling total is returned below 20.70 tons per year for total HAP emissions. Note, total HAP emission recording requirements encompass all sources of total HAP emissions from Silgan Containers Manufacturing, Plant No. 94-01-040.
 - a. See Section C)(1)a above
 - b. See Section C)(1)b above

Authority for Requirement: DNR Construction Permits 96-A-1258-S11, 00-A-552-S3, 02-A-332-S3, 05-A-259-S1, 05-A-260-S7, 05-A-261-S1, 05-A-262-S2, 05-A-263-S2, 07-A-1000-S1, 07-A-1001-S1, 07-A-1003-S5, 07-A-1036-S3, 09-A-514-S3

Opacity (visible emissions): 40% opacity

Authority for Requirement: 567 IAC 23.3(2)"d"

<u>Sulfur Dioxide (SO₂):</u> 500 parts per million by volume Authority for Requirement: 567 IAC 23.3(3)"e"

Particulate Matter:

No person shall cause or allow the emission of particulate matter from any source in excess of the emission standards specified in this chapter, except as provided in 567 – Chapter 24. For sources constructed, modified or reconstructed on or after July 21, 1999, the emission of particulate matter from any process shall not exceed an emission standard of 0.1 grain per dry standard cubic foot of exhaust gas, except as provided in 567 – 21.2(455B), 23.1(455B), 23.4(455B) and 567 – Chapter 24.

For sources constructed, modified or reconstructed prior to July 21, 1999, the emission of particulate matter from any process shall not exceed the amount determined from Table I, or amount specified in a permit if based on an emission standard of 0.1 grain per standard cubic foot of exhaust gas or established from standards provided in 23.1(455B) and 23.4(455B). Authority for Requirement: 567 IAC 23.3(2)"a"

<u>Fugitive Dust:</u> Attainment and Unclassified Areas - A person shall take reasonable precautions to prevent particulate matter from becoming airborne in quantities sufficient to cause a nuisance as defined in Iowa Code section 657.1 when the person allows, causes or permits any materials to be handled, transported or stored or a building, its appurtenances or a construction haul road to be used, constructed, altered, repaired or demolished, with the exception of farming operations or dust generated by ordinary travel on unpaved roads. Ordinary travel includes routine traffic and road maintenance activities such as scarifying, compacting, transporting road maintenance surfacing material, and scraping of the unpaved public road surface. (the preceding sentence is State Only) All persons, with the above exceptions, shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate. The public highway authority shall be responsible for taking corrective action in those cases where said authority has received complaints of or has actual knowledge of dust conditions which require abatement pursuant to this subrule. Reasonable precautions may include, but not be limited to, the following procedures.

- 1. Use, where practical, of water or chemicals for control of dusts in the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land.
- 2. Application of suitable materials, such as but not limited to asphalt, oil, water or chemicals on unpaved roads, material stockpiles, race tracks and other surfaces which can give rise to airborne dusts.
- 3. Installation and use of containment or control equipment, to enclose or otherwise limit the emissions resulting from the handling and transfer of dusty materials, such as but not limited to grain, fertilizer or limestone.
- 4. Covering, at all times when in motion, open-bodied vehicles transporting materials likely to give rise to airborne dusts.
- 5. Prompt removal of earth or other material from paved streets or to which earth or other material has been transported by trucking or earth-moving equipment, erosion by water or other means.
- 6. Reducing the speed of vehicles traveling over on-property surfaces as necessary to minimize the generation of airborne dusts.

Authority for Requirement: 567 IAC 23.3(2)"c"

III. Emission Point-Specific Conditions

Facility Name: Silgan Containers Manufacturing Corporation – Fort Dodge

Permit Number: 00-TV-035R4

Emission Point ID Number: EP 101

Associated Equipment

Emission Point ID	Emission Unit ID	Emission Unit Description	Raw Material	Rated Capacity
	Liner 10	Line 211 End Compound Liner 10	End Sealing	1,500 ends/min
	Liner 11	Line 211 End Compound Liner 11	Compounds	1,500 ends/min
EP 101	Liner 12	Line 211 End Compound Liner 12	Compounds	1,500 ends/min
EP 101	Mister 10	Line 211 Mist Spray Applicator 10	Misting	1,500 ends/min
	Mister 11	Line 211 Mist Spray Applicator 11	Spray	1,500 ends/min
	Mister 12	Line 211 Mist Spray Applicator 12	Solvents	1,500 ends/min

Applicable Requirements

Emission Limits (lb/hr, gr/dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit(s): 40% (1)

Authority for Requirement: DNR Construction Permit 05-A-263-S2

567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (PM) Emission Limit(s): 0.01 gr/dscf

Authority for Requirement: DNR Construction Permit 05-A-263-S2

567 IAC 23.4(13)

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit(s): 410 tons/yr

Authority for Requirement: DNR Construction Permit 05-A-263-S2

Pollutant: Hazardous Air Pollutant (Single HAP)

Emission Limit(s): 9.4 tons/yr

Authority for Requirement: DNR Construction Permit 05-A-263-S2

⁽¹⁾An exceedance of the indicator opacity of "no visible emissions" will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Hazardous Air Pollutant (Total HAP)

Emission Limit(s): 24.4 tons/yr

Authority for Requirement: DNR Construction Permit 05-A-263-S2

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the requirements listed below.

Reporting & Record keeping:

Records shall be kept on-site for at least five (5) years and shall be available for inspection by the Department. Records shall be maintained in a legible and orderly manner and shall indicate the following:

Operating Condition Monitoring

- A. Record daily, the identification and amount of all VOC/HAP containing material used at Silgan Containers Manufacturing, Plant No. 94-01-040 (including end seal compound liners, mist applicators, conversion presses, post repair spray applications, videojet printers, clean up operations, etc.), in gallons. The amount of VOC/HAP containing material used shall be determined either by direct measurement or shall be determined by the daily production rates of can ends and tabs. If the amount is determined by production rates, the permittee shall maintain records on the amount of can ends and tabs produced daily and the application rates of VOC/HAP containing material per can end and tab.
- B. Record the VOC content of all VOC/HAP containing material used at Silgan Containers Manufacturing, Plant No. 94-01-040, in pounds per gallon.
- C. Record the individual HAP content of all VOC/HAP containing material used at Silgan Containers Manufacturing, Plant No. 94-01-040, in pounds per gallon..
- D. Record the total HAP content of all VOC/HAP containing material used at Silgan Containers Manufacturing, Plant No. 94-01-040, in pounds per gallon.
- E. Calculate total VOC emissions in tons from Silgan Containers Manufacturing, Plant No. 94-01-040, on a monthly basis and keep rolling 12-month totals. Records for total VOC emissions shall be kept on monthly basis until time that total VOC emissions exceed 328 tons per year. At this point owner or operator shall immediately begin keeping a 365-day rolling total of the quantity of total VOC emissions emitted from Silgan Containers Manufacturing, Plant No. 94-01-040, in tons. Calculation requirements will revert back to a monthly basis if the 365-day rolling total is returned below 328 tons per year for total VOC emissions. Note, total VOC emission recording requirements encompass all sources of VOC emissions from Silgan Containers Manufacturing, Plant No. 94-01-040.
 - i. In determining total VOC, individual HAP and Total HAP emissions from 300 Line Post Repair Spray Application (EU 805), owner and operator shall assume 98 percent of the VOC/HAP containing material used in the 300 Line Post Repair Spray Application is destroyed in the RTO.
 - ii. In determining total VOC, individual HAP and Total HAP emissions from 211 Line Post Repair Spray Application (EU 800), owner and operator shall assume 98 percent of the VOC/HAP containing material used in the 211 Line Post Repair Spray

Application is destroyed in the RTO.

- F. Calculate Single HAP emissions in tons from Silgan Containers Manufacturing, Plant No. 94-01-040, on a monthly basis and keep rolling 12-month totals. Records for Single HAP emissions shall be kept on monthly basis until time that Single HAP emissions exceed 7.5 tons per year. At this point owner or operator shall immediately begin keeping a 365-day rolling total of the quantity of Single HAP emissions emitted from Silgan Containers Manufacturing, Plant No. 94-01-040, in tons. Calculation requirements will revert back to a monthly basis if the 365-day rolling total is returned below 7.5 tons per year for Single HAP emissions. Note, Single HAP emission recording requirements encompass all sources of Single HAP emissions from Silgan Containers Manufacturing, Plant No. 94-01-040.
 - i. In determining total VOC, individual HAP and total HAP emissions from 300 Line Post Repair Spray Application (EU 805), owner and operator shall assume 98 percent of the VOC/HAP containing material used in the 300 Line Post Repair Spray Application is destroyed in the RTO.
 - ii. In determining total VOC, individual HAP and total HAP emissions from 211 Line Post Repair Spray Application (EU 800), owner and operator shall assume 98 percent of the VOC/HAP containing material used in the 211 Line Post Repair Spray Application is destroyed in the RTO.
- G. Calculate total HAP emissions in tons from Silgan Containers Manufacturing, Plant No. 94-01-040, on a monthly basis and keep rolling 12-month totals. Records for total HAP emissions shall be kept on monthly basis until time that total HAP emissions exceed 20.0 tons per year. At this point owner or operator shall immediately begin keeping a 365-day rolling total of the quantity of total HAP emissions emitted from Silgan Containers Manufacturing, Plant No. 94-01-040, in tons. Calculation requirements will revert back to a monthly basis if the 365-day rolling total is returned below 20.0 tons per year for total HAP emissions. Note, total HAP emission recording requirements encompass all sources of total HAP emissions from Silgan Containers Manufacturing, Plant No. 94-01-040.
 - i. In determining total VOC, individual HAP and total HAP emissions from 300 Line Post Repair Spray Application (EU 805), owner and operator shall assume 98 percent of the VOC/HAP containing material used in the 300 Line Post Repair Spray Application is destroyed in the RTO.
 - ii. In determining total VOC, individual HAP and total HAP emissions from 211 Line Post Repair Spray Application (EU 800), owner and operator shall assume 98 percent of the VOC/HAP containing material used in the 211 Line Post Repair Spray Application is destroyed in the RTO.
- H. Retain Material Safety Data Sheets (MSDS) for VOC/HAP containing materials used at Silgan Containers Manufacturing, Plant No. 94-01-040.

Authority for Requirement: DNR Construction Permit 05-A-263-S2

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height, (ft, from the ground): 46 Stack Opening, (inches, dia.): 16.0 Exhaust Flow Rate (scfm): 12,000 Exhaust Temperature (°F): Ambient Discharge Style: Vertical Unobstructed

Authority for Requirement: DNR Construction Permit 05-A-263-S2

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within 30 days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

Monitoring Requirements

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required? Authority for Requirement: 567 IAC 22.108(3)	Yes 🗌 No 🖂

Emission Point ID Number: EP 102

Associated Equipment

Emission Point ID	Emission Unit ID	Emission Unit Description	Raw Material	Rated Capacity
	Liner 15	300 Full Panel Easy Open (FPEO) End Compound Liner 15		
	Liner 16	300 Full Panel Easy Open (FPEO) End Compound Liner 16	End Sealing Compounds	1,200 ends/min
EP 102	Liner 17	300 Full Panel Easy Open (FPEO) End Compound Liner 17		
EF 102	Mister 15	300 Full Panel Easy Open (FPEO) Mist Spray Applicator 15	- Misting	
	Mister 16	300 Full Panel Easy Open (FPEO) Mist Spray Applicator 16	Spray	1,200 ends/min
	Mister 17	300 Full Panel Easy Open (FPEO) Mist Spray Applicator 17	Solvents	

Applicable Requirements

Emission Limits (lb/hr, gr/dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit(s): 40% (1)

Authority for Requirement: DNR Construction Permit 07-A-1001

567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (PM) Emission Limit(s): 0.01 gr/dscf

Authority for Requirement: DNR Construction Permit 07-A-1001

567 IAC 23.4(13)

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit(s): 410 tons/yr; $100 \text{ tons/yr}^{(2)}$

Authority for Requirement: DNR Construction Permit 07-A-1001

(2) 100 TPY limit restricts potential VOC emissions from 300 Full Panel Easy Open (FPEO) End Line (end seal compound liners 15, 16, 17, mist applicators 15, 16, 17, conversion presses CP 22 and CP 23, post repair spray application, EU 805, videojet printers, EU 503, clean up operations, etc).

Pollutant: Hazardous Air Pollutant (Single HAP)

Emission Limit(s): 9.4 tons/yr

Authority for Requirement: DNR Construction Permit 07-A-1001

⁽¹⁾ An exceedance of the indicator opacity of "no visible emissions" will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Hazardous Air Pollutant (Total HAP)

Emission Limit(s): 24.4 tons/yr

Authority for Requirement: DNR Construction Permit 07-A-1001

Operational Limits & Reporting and Record keeping Requirements

The owner/operator of this equipment shall comply with the requirements listed below. Records shall be kept on-site for at least five (5) years and shall be available for inspection by the Department. Records shall be maintained in a legible and orderly manner and shall indicate the following:

300 FPEO End Line Monitoring

- A. Record daily, the identification and amount of all VOC/HAP containing material used in 300 FPEO End Line (including end seal compound liners 15, 16, and 17, mist applicators 15, 16, and 17, conversion presses CP22 and CP23, post repair spray application, EU 805, videojet printers, EU503, clean up operations, etc.) in gallons. The amount of VOC/HAP containing material used shall be determined either by direct measurement or shall be determined by the daily production rates of can ends and tabs. If the amount is determined by production rates, the permittee shall maintain records on the amount of can ends and tabs produced daily and the application rates of VOC/HAP containing material per can end and tab.
- B. Record the VOC content of each VOC/HAP containing material used in 300 FPEO End Line (including end seal compound liners 15, 16, and 17, mist applicators 15, 16, and 17, conversion presses CP 22 and CP 23, post repair spray application, EU 805, videojet printers, EU 503, clean up operations, etc.) in pounds per gallon.
- C. Calculate VOC emissions in tons from 300 FPEO End Line (including end seal compound liners 15, 16, and 17, mist applicators 15, 16, and 17, conversion presses CP 22 and CP 23, post repair spray application, EU 805, videojet printers, EU 503, clean up operations, etc.) on a monthly basis and keep rolling 12-month totals. Records for total VOC emissions shall be kept on monthly basis until VOC emissions exceed 85.0 tons per year. At this point owner or operator shall immediately begin keeping a 365-day rolling total of the quantity of VOC emission emitted from FPEO End Line in tons. Calculation requirements will revert back to a monthly basis if the 365-day rolling total is returned below 85.0 tons per year for VOC emissions.
 - i In determining total VOC, individual HAP and Total HAP emissions from 300 Line Post Repair Spray Application (EU 805), owner and operator shall assume 98 percent of the VOC/HAP containing material used in the 300 Line Post Repair Spray Application is destroyed in the RTO.
- D. Retain Material Safety Data Sheets (MSDS) for VOC/HAP containing materials used in 300 FPEO End Line (including end seal compound liners 15, 16, and 17, mist applicators 15, 16, and 17, conversion presses CP 22 and CP 23, post repair spray application, EU 805, videojet printers, EU503, clean up operations, etc.).

Plant-wide Monitoring

- E. Record daily, the identification and amount of all VOC/HAP containing material used at Silgan Containers Manufacturing, Plant No. 94-01-040 (including end seal compound liners, mist applicators, conversion presses, post repair spray applications, videojet printers, clean up operations, etc.) in gallons. The amount of VOC/HAP containing material used shall be determined either by direct measurement or shall be determined by the daily production rates of can ends and tabs. If the amount is determined by production rates, the permittee shall maintain records on the amount of can ends and tabs produced daily and the application rates of VOC/HAP containing material per can end and tab.
- F. Record the VOC content of all VOC/HAP containing material used at Silgan Containers Manufacturing, Plant No. 94-01-040 in pounds per gallon.
 - G. Record the individual HAP content of all VOC/HAP containing material used at Silgan Containers Manufacturing, Plant No. 94-01-040 in pounds per gallon.
- H. Record the total HAP content of all VOC/HAP containing material used at Silgan Containers Manufacturing, Plant No. 94-01-040 in pounds per gallon.
- I. Calculate total VOC emissions in tons from Silgan Containers Manufacturing, Plant No. 94-01-040 on a monthly basis and keep rolling 12-month totals. Records for total VOC emissions shall be kept on monthly basis until time that total VOC emissions exceed 350 tons per year. At this point owner or operator shall immediately begin keeping a 365-day rolling total of the quantity of total VOC emissions emitted from Silgan Containers Manufacturing, Plant No. 94-01-040 in tons. Calculation requirements will revert back to a monthly basis if the 365-day rolling total is returned below 350 tons per year for total VOC emissions. Note, total VOC emission recording requirements encompass all sources of VOC emissions from Silgan Containers Manufacturing, Plant No. 94-01-040.
 - i In determining total VOC, individual HAP and Total HAP emissions from 300 Line Post Repair Spray Application (EU 805), owner and operator shall assume 98 percent of the VOC/HAP containing material used in the 300 Line Post Repair Spray Application is destroyed in the RTO.
 - ii In determining total VOC, individual HAP and Total HAP emissions from 211 Line Post Repair Spray Application (EU 800), owner and operator shall assume 98 percent of the VOC/HAP containing material used in the 211 Line Post Repair Spray Application is destroyed in the RTO.

- J. Calculate Single HAP emissions in tons from Silgan Containers Manufacturing, Plant No. 94-01-040 on a monthly basis and keep rolling 12-month totals. Records for Single HAP emissions shall be kept on monthly basis until time that Single HAP emissions exceed 8.0 tons per year. At this point owner or operator shall immediately begin keeping a 365-day rolling total of the quantity of Single HAP emissions emitted from Silgan Containers Manufacturing, Plant No. 94-01-040 in tons. Calculation requirements will revert back to a monthly basis if the 365-day rolling total is returned below 8.0 tons per year for Single HAP emissions. Note, Single HAP emission recording requirements encompass all sources of Single HAP emissions from Silgan Containers Manufacturing, Plant No. 94-01-040.
 - i In determining total VOC, individual HAP and total HAP emissions from 300 Line Post Repair Spray Application (EU 805), owner and operator shall assume 98 percent of the VOC/HAP containing material used in the 300 Line Post Repair Spray Application is destroyed in the RTO.
 - ii In determining total VOC, individual HAP and total HAP emissions from 211 Line Post Repair Spray Application (EU800), owner and operator shall assume 98 percent of the VOC/HAP containing material used in the 211 Line Post Repair Spray Application is destroyed in the RTO.
- K. Calculate total HAP emissions in tons from Silgan Containers Manufacturing, Plant No. 94-01-040 on a monthly basis and keep rolling 12-month totals. Records for total HAP emissions shall be kept on monthly basis until time that total HAP emissions exceed 20.70 tons per year. At this point owner or operator shall immediately begin keeping a 365-day rolling total of the quantity of total HAP emissions emitted from Silgan Containers Manufacturing, Plant No. 94-01-040 in tons. Calculation requirements will revert back to a monthly basis if the 365-day rolling total is returned below 20.70 tons per year for total HAP emissions. Note, total HAP emission recording requirements encompass all sources of total HAP emissions from Silgan Containers Manufacturing, Plant No. 94-01-040.
 - i In determining total VOC, individual HAP and total HAP emissions from 300 Line Post Repair Spray Application (EU 805), owner and operator shall assume 98 percent of the VOC/HAP containing material used in the 300 Line Post Repair Spray Application is destroyed in the RTO.
 - ii In determining total VOC, individual HAP and total HAP emissions from 211 Line Post Repair Spray Application (EU 800), owner and operator shall assume 98 percent of the VOC/HAP containing material used in the 211 Line Post Repair Spray Application is destroyed in the RTO.
- L. Retain Material Safety Data Sheets (MSDS) for VOC/HAP containing materials used at Silgan Containers Manufacturing, Plant No. 94-01-040.

Authority for Requirement: DNR Construction Permit 07-A-1001

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height, (ft, from the ground): 42.0 Stack Opening, (inches, dia.): 18.0

Exhaust Flow Rate (scfm): 1,200 Exhaust Temperature (°F): Ambient Discharge Style: Vertical Unobstructed

Authority for Requirement: DNR Construction Permit 07-A-1001

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within 30 days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

Monitoring Requirements

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?	Yes ☐ No ⊠
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🗵
Compliance Assurance Monitoring (CAM) Plan Required?	Yes No No

Authority for Requirement: 567 IAC 22.108(3)

Emission Point ID Number: EP 200

Associated Equipment

Emission Point ID	Emission Unit ID	Emission Unit Description	Raw Material	Rated Capacity
EP 200	Liner 5	Line 307 End Compound Liner 5	End Sealing Compounds	1,250 ends/min (each)
	Liner 6	Line 307 End Compound Liner 6		
	Liner 7	Line 307 End Compound Liner 7		
	Liner 8	Line 307 End Compound Liner 8		
	Mister 5	Line 307 Mist Spray Applicator 5	Misting Spray Solvents	1,250 ends/min (each)
	Mister 6	Line 307 Mist Spray Applicator 6		
	Mister 7	Line 307 Mist Spray Applicator 7		
	Mister 8	Line 307 Mist Spray Applicator 8		

Applicable Requirements

Emission Limits (lb/hr, gr/dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit(s): 40% (1)

Authority for Requirement: DNR Construction Permit 96-A-1258-S11

567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (PM) Emission Limit(s): 0.01 gr/dscf

Authority for Requirement: DNR Construction Permit 96-A-1258-S11

567 IAC 23.4(13)

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit(s): 410 tons/yr

Authority for Requirement: DNR Construction Permit 96-A-1258-S11

Pollutant: Hazardous Air Pollutant (Single HAP)

Emission Limit(s): 9.4 tons/yr

Authority for Requirement: DNR Construction Permit 96-A-1258-S11

Pollutant: Hazardous Air Pollutant (Total HAP)

Emission Limit(s): 24.4 tons/yr

Authority for Requirement: DNR Construction Permit 96-A-1258-S11

⁽¹⁾ An exceedance of the indicator opacity of "no visible emissions" will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Operational Limits & Reporting and Record keeping Requirements

The owner/operator of this equipment shall comply with the requirements listed below.

Reporting & Record keeping:

Records shall be kept on-site for at least five (5) years and shall be available for inspection by the Department. Records shall be maintained in a legible and orderly manner and shall indicate the following:

- A. Record daily, the identification and amount of all VOC/HAP containing material used at Silgan Containers Manufacturing, Plant No. 94-01-040 (including end seal compound liners, mist applicators, conversion presses, post repair spray applications, videojet printers, clean up operations, etc.), in gallons. The amount of VOC/HAP containing material used shall be determined either by direct measurement or shall be determined by the daily production rates of can ends and tabs. If the amount is determined by production rates, the permittee shall maintain records on the amount of can ends and tabs produced daily and the application rates of VOC/HAP containing material per can end and tab.
- B. Record the VOC content of all VOC/HAP containing material used at Silgan Containers Manufacturing, Plant No. 94-01-040, in pounds per gallon.
- C. Record the individual HAP content of all VOC/HAP containing material used at Silgan Containers Manufacturing, Plant No. 94-01-040, in pounds per gallon.
- D. Record the total HAP content of all VOC/HAP containing material used at Silgan Containers Manufacturing, Plant No. 94-01-040, in pounds per gallon.
- E. Calculate total VOC emissions in tons from Silgan Containers Manufacturing, Plant No. 94-01-040, on a monthly basis and keep rolling 12-month totals. Records for total VOC emissions shall be kept on monthly basis until time that total VOC emissions exceed 328 tons per year. At this point owner or operator shall immediately begin keeping a 365-day rolling total of the quantity of total VOC emissions emitted from Silgan Containers Manufacturing, Plant No. 94-01-040, in tons. Calculation requirements will revert back to a monthly basis if the 365-day rolling total is returned below 328 tons per year for total VOC emissions. Note, total VOC emission recording requirements encompass all sources of VOC emissions from Silgan Containers Manufacturing, Plant No. 94-01-040.
 - i. In determining total VOC, individual HAP and Total HAP emissions from 300 Line Post Repair Spray Application (EU 805), owner and operator shall assume 98 percent of the VOC/HAP containing material used in the 300 Line Post Repair Spray Application is destroyed in the RTO.
 - ii. In determining total VOC, individual HAP and Total HAP emissions from 211 Line Post Repair Spray Application (EU 800), owner and operator shall assume 98 percent of the VOC/HAP containing material used in the 211 Line Post Repair Spray Application is destroyed in the RTO.
- F. Calculate Single HAP emissions in tons from Silgan Containers Manufacturing, Plant No. 94-01-040, on a monthly basis and keep rolling 12-month totals. Records for Single HAP emissions shall be kept on monthly basis until time that Single HAP emissions exceed 7.5

tons per year. At this point owner or operator shall immediately begin keeping a 365-day rolling total of the quantity of Single HAP emissions emitted from Silgan Containers Manufacturing, Plant No. 94-01-040, in tons. Calculation requirements will revert back to a monthly basis if the 365-day rolling total is returned below 7.5 tons per year for Single HAP emissions. Note, Single HAP emission recording requirements encompass all sources of Single HAP emissions from Silgan Containers Manufacturing, Plant No. 94-01-040.

- i. In determining total VOC, individual HAP and total HAP emissions from 300 Line Post Repair Spray Application (EU 805), owner and operator shall assume 98 percent of the VOC/HAP containing material used in the 300 Line Post Repair Spray Application is destroyed in the RTO.
- ii. In determining total VOC, individual HAP and total HAP emissions from 211 Line Post Repair Spray Application (EU 800), owner and operator shall assume 98 percent of the VOC/HAP containing material used in the 211 Line Post Repair Spray Application is destroyed in the RTO.
- G. Calculate total HAP emissions in tons from Silgan Containers Manufacturing, Plant No. 94-01-040, on a monthly basis and keep rolling 12-month totals. Records for total HAP emissions shall be kept on monthly basis until time that total HAP emissions exceed 20.0 tons per year. At this point owner or operator shall immediately begin keeping a 365-day rolling total of the quantity of total HAP emissions emitted from Silgan Containers Manufacturing, Plant No. 94-01-040, in tons. Calculation requirements will revert back to a monthly basis if the 365-day rolling total is returned below 20.0 tons per year for total HAP emissions. Note, total HAP emission recording requirements encompass all sources of total HAP emissions from Silgan Containers Manufacturing, Plant No. 94-01-040.
 - i. In determining total VOC, individual HAP and total HAP emissions from 300 Line Post Repair Spray Application (EU 805), owner and operator shall assume 98 percent of the VOC/HAP containing material used in the 300 Line Post Repair Spray Application is destroyed in the RTO.
 - ii. In determining total VOC, individual HAP and total HAP emissions from 211 Line Post Repair Spray Application (EU 800), owner and operator shall assume 98 percent of the VOC/HAP containing material used in the 211 Line Post Repair Spray Application is destroyed in the RTO.

H. Retain Material Safety Data Sheets (MSDS) for VOC/HAP containing materials used at Silgan Containers Manufacturing, Plant No. 94-01-040.

Authority for Requirement: DNR Construction Permit 96-A-1258-S11

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height, (ft, from the ground): 45 Stack Opening, (inches, dia.): 16.0 Exhaust Flow Rate (scfm): 12,000 Exhaust Temperature (°F): Ambient Discharge Style: Vertical Unobstructed

Authority for Requirement: DNR Construction Permit 96-A-1258-S11

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within 30 days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

Monitoring Requirements

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🗵
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🗵
Compliance Assurance Monitoring (CAM) Plan Required?	Yes ☐ No ⊠

Authority for Requirement: 567 IAC 22.108(3)

Emission Point ID Number: EP 700

Associated Equipment

Associated Emission Unit ID Number: EU 700* Emissions Control Equipment ID Number: CE 100 Emissions Control Equipment Description: Cyclone

Emission Unit vented through this Emission Point: EU 700*

Emission Unit Description: Pneumatically conveyed Scrap Aluminum Tab Slugs Collection –

Process Stack Emissions

Raw Material/Fuel: Scrap Aluminum Tab Slugs

Rated Capacity: 3,930 lb/hr *Includes the following units:

Emission Unit	Emission Unit ID	Maximum Capacity
Burhke Conversion Press 4	CP 4	680 ends per minute
Stolle Conversion Press 5	CP 5	2,200 ends per minute
Stolle Conversion Press 6	CP 6	2,200 ends per minute
Stolle Conversion Press 7	CP 7	2,200 ends per minute
DRT Conversion Press 10	CP 10	1,650 ends per minute
DRT Conversion Press 11	CP 11	1,650 ends per minute
Spam Conversion Press 20	CP 20	1,000 ends per minute
Stolle Conversion Press 22	CP 22	1,650 ends per minute
Stolle Conversion Press 23	CP 23	1,650 ends per minute

Applicable Requirements

Emission Limits (lb/hr, gr/dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit(s): 40%⁽¹⁾

Authority for Requirement: DNR Construction Permit 00-A-551-S4

567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (PM) Emission Limit(s): 0.1 gr/dscf

Authority for Requirement: DNR Construction Permit 00-A-551-S4

567 IAC 23.3(2)"a"

⁽¹⁾An exceedance of the indicator opacity of 25% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

- A. The Cyclone (CE 100) shall be operated and maintained according to the manufacturer's specifications with inspections occurring at a minimum of once per year. The owner or operator shall maintain a log of all maintenance and inspection activities performed on the Cyclone (CE 100). This log shall include, but is not necessarily limited to:
 - a. The date and time any inspection and/or maintenance was performed on the Cyclone (CE 100);
 - b. Any issues identified during the inspection and the date each issue was resolved;
 - c. Any issues addressed during the maintenance activities and the date each issue was resolved:
 - d. Identification of the staff member performing the maintenance or inspection.

Authority for Requirement: DNR Construction Permit 00-A-551-S4

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height, (ft, from the ground): 33 Stack Opening, (inches): 24 x 60 Exhaust Flow Rate (scfm): 4,000 Exhaust Temperature (°F): 68

Discharge Style: Downward

Authority for Requirement: DNR Construction Permit 00-A-551-S4

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within 30 days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

EP 28 00-TV-035R4 1/1/2024

The owner/operator of this equipment shall comply with the monitoring requirements listed below.		
Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂	
Facility Maintained Operation & Maintenance Plan Required? Relevant requirements of O & M Plan for this equipment: Particulate Matter (PM) and PM ₁₀	Yes 🛛 No 🗌	
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂	

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

The data pertaining to the plan shall be maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

Authority for Requirement: 567 IAC 22.108(3)

Monitoring Requirements

EP 29 00-TV-035R4 1/1/2024

Emission Point ID Numbers: EP 701A, EP 701B

Associated Equipment

Associated Emission Unit ID Number: EU 701* Emissions Control Equipment ID Number: CE 101

Emissions Control Equipment Description: Air Screen Collection

Emission Point ID	Emission Unit ID	Emission Unit Description	Raw Material	Rated Capacity
EP 701A	EU 701*	Pneumatically Conveyed Scrap Aluminum Skeletons Collection –	Scrap Aluminum Body Plate	20,900 lb/hr
EP 701B		Process Stack Emissions		

*Includes the following units:

Unit Description	Emission Unit ID	Maximum Capacity
DRD Can Line 1 Trimmers	T 1	2,170 cans per minute
DRD Can Line 2 Trimmers	T 2	1,705 cans per minute
EL II 307 End Size Shell Press	SP 1	4,800 ends per minute
Spam Shell Press 17	SP 17	900 ends per minute
307 End Shell Press	SP 25	2,400 ends per minute
Stolle Shell Press 26	SP 26	2,400 ends per minute
Bliss Shell Press 27	SP 27	2,400 ends per minute
Burhke Conversion Press 4	CP 4	680 ends per minute
Stolle Conversion Press 5	CP 5	2,200 ends per minute
Stolle Conversion Press 6	CP 6	2,200 ends per minute
Stolle 4-out Conversion Press 7	CP 7	2,200 ends per minute
Conversion Press	CP 8	2,200 ends per minute
DRT Conversion Press 10	CP 10	1,650 ends per minute
DRT Conversion Press 11	CP 11	1,650 ends per minute
Spam Conversion Press 20	CP 20	1,000 ends per minute
Stolle Conversion Press 22	CP 22	1,650 ends per minute
Stolle Conversion Press 23	CP 23	1,650 ends per minute

Applicable Requirements

Emission Limits (lb/hr, gr/dscf, lb./MMBtu, % opacity, etc.)

The emissions from each emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit(s): 40%⁽¹⁾

Authority for Requirement: DNR Construction Permits 00-A-552-S4 and 07-A-1036-S3

567 IAC 23.3(2)"d"

(1) An exceedance of the indicator opacity of "No Visible Emissions" will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g. stack testing).

Pollutant: Particulate Matter (PM) Emission Limit(s): 0.01 gr/scf

Authority for Requirement: DNR Construction Permits 00-A-552-S4 and 07-A-1036-S3

567 IAC 23.3(2)"a"

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit(s): 34.04 tons/yr⁽²⁾

Authority for Requirement: DNR Construction Permit 00-A-552-S4 and 07-A-1036-S3 (2)This limit applies to the following emission units: Liner 1, Liner 2, Liner 20, Mister 20, Conversion Press CP8, and VideoJet Ink Marking (EU 503).

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit(s): 100 tons/yr⁽³⁾

Authority for Requirement: DNR Construction Permit 00-A-552-S4 and 07-A-1036-S3

(3) This limit applies to the 300 Full Panel Easy Open (FPEO) End Line (Stolle Conversion Press 22, Stolle Conversion Press 23, End Compound Liner 15, End Compound Liner 16, End Compound Liner 17, Mist Spray Applicator 15, Mist Spray Applicator 16, Mist Spray Applicator 17, Clean Up Solvents, Video Jet Ink Marking, and Natural Gas-Fired Equipment).

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit(s): 410 tons/yr

Authority for Requirement: DNR Construction Permit 00-A-552-S4 and 07-A-1036-S3

Pollutant: Hazardous Air Pollutant (Single HAP)

Emission Limit(s): 9.4 tons/yr

Authority for Requirement: DNR Construction Permit 00-A-552-S4 and 07-A-1036-S3

Pollutant: Hazardous Air Pollutant (Total HAP)

Emission Limit(s): 24.4 tons/yr

Authority for Requirement: DNR Construction Permit 00-A-552-S4 and 07-A-1036-S3

EP 31 00-TV-035R4 1/1/2024

Operational Limits & Reporting/Record keeping Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

Records shall be kept on site for at least five years and shall be available for inspection by the Department.

Project Number 19-013 Monitoring

- A. On a daily basis, the owner or operator shall record the identification and amount of all VOC containing material used in the units associated with Project Number 19-013 (including Liner 1, Liner 2, Liner 20, Mister 20, Conversion Press 8, and all VideoJet Printers (EU 503)) in gallons. The amount of VOC/HAP containing material used shall be determined either by direct measurement or shall be determined by the daily production rates of can ends and tabs. If the amount is determined by production rates, the owner or operator shall maintain records on the amount of can ends and tabs produced daily and the application rates of VOC containing material per can end and tab.
- B. The owner or operator shall record the VOC content of each VOC containing material used in the units associated with Project Number 19-013 (including Liner 1, Liner 2, Liner 20, Mister 20, Conversion Press 8, and all VideoJet Printers (EU 503)) in pounds per gallon.
- C. On a monthly basis, the owner or operator shall calculate the total VOC emissions, in tons, from the units associated with Project Number 19-013 (including Liner 1, Liner 2, Liner 20, Mister 20, Conversion Press 8, and all VideoJet Printers (EU 503)) during the previous month. On a monthly basis, the owner or operator shall also calculate the total VOC emissions, in tons, from the units associated with Project Number 19-013 (including Liner 1, Liner 2, Liner 20, Mister 20, Conversion Press 8, and all VideoJet Printers (EU 503)) during the previous12-month period. Records for total VOC emissions shall be kept on monthly basis until the rolling 12-month total VOC emissions exceed 27.2 tons per year. At this point owner or operator shall immediately begin keeping a 365-day rolling total of the quantity of total VOC emissions emitted from the units associated with Project Number 19-013 (including Liner 1, Liner 2, Liner 20, Mister 20, Conversion Press 8, and all VideoJet Printers (EU 503)) in tons. The calculation frequency shall revert back to a monthly basis once the rolling 365-day total VOC emissions are below 27.2 tons.
 - a. In determining total VOC emissions from the units associated with Project Number 19-013 (including Liner 1, Liner 2, Liner 20, Mister 20, Conversion Press 8, and all VideoJet Printers (EU 503)), the owner and operator shall assume that 85 percent of the VOC containing material is captured by the RTO. The remaining 15 percent shall be assumed to be emitted uncontrolled through EP EF2. The owner or operator shall assume that 98 percent of the captured VOC containing material used in the in the units associated with Project Number 19-013 (including Liner 1, Liner 2, Liner 20, Mister 20, Conversion Press 8, and all VideoJet Printers (EU 503)) shall be destroyed in the RTO.

D. The owner or operator shall retain Safety Data Sheets (SDS) for VOC/HAP containing materials used in the units associated with Project Number 19-013 (including Liner 1, Liner 2, Liner 20, Mister 20, Conversion Press 8, and all VideoJet Printers (EU 503)).

300 FPEO End Line Monitoring

- E. On a daily basis, the owner or operator shall record the identification and amount of all VOC/HAP containing material used in 300 FPEO End Line (including end seal compound liners 15, 16, and 17, mist applicators 15, 16, and 17, conversion presses CP 22 and CP 23, post repair spray application, EU805, videojet printers, EU503, clean up operations, etc.) in gallons. The amount of VOC/HAP containing material used shall be determined either by direct measurement or shall be determined by the daily production rates of can ends and tabs. If the amount is determined by production rates, the owner or operator shall maintain records on the amount of can ends and tabs produced daily and the application rates of VOC/HAP containing material per can end and tab.
- F. The owner or operator shall record the VOC content of each VOC/HAP containing material used in 300 FPEO End Line (including end seal compound liners 15, 16, and 17, mist applicators 15, 16, and 17, conversion presses CP 22 and CP 23, post repair spray application, EU 805, videojet printers, EU 503, clean up operations, etc.) in pounds per gallon.
- G. On a monthly basis, the owner or operator shall calculate the total VOC emissions, in tons, from the 300 FPEO End Line (including end seal compound liners 15, 16, and 17, mist applicators 15, 16, and 17, conversion presses CP 22 and CP 23, post repair spray application, EU 805, videojet printers, EU 503, clean up operations, etc.) during the previous month. On a monthly basis, the owner or operator shall also calculate the total VOC emissions, in tons, from the 300 FPEO End Line (including end seal compound liners 15, 16, and 17, mist applicators 15, 16, and 17, conversion presses CP 22 and CP 23, post repair spray application, EU 805, videojet printers, EU 503, clean up operations, etc.) during the previous 12-month period. Records for total VOC emissions shall be kept on monthly basis until the rolling 12-month total VOC emissions exceed 85.0 tons per year. At this point owner or operator shall immediately begin keeping a 365-day rolling total of the quantity of total VOC emissions emitted from the 300 FPEO End Line (including end seal compound liners 15, 16, and 17, mist applicators 15, 16, and 17, conversion presses CP 22 and CP 23, post repair spray application, EU 805, videojet printers, EU 503, clean up operations, etc.) in tons. The calculation frequency shall revert back to a monthly basis once the rolling 365-day total VOC emissions are below 85.0 tons.
 - a. In determining total VOC, individual HAP and Total HAP emissions from 300
 Line Post Repair Spray Application (EU 805), owner and operator shall assume
 98 percent of the VOC/HAP containing material used in the 300 Line Post Repair
 Spray Application is destroyed in the RTO.
- H. The owner or operator shall retain Safety Data Sheets (SDS) for VOC/HAP containing materials used in 300 FPEO End Line (including end seal compound liners 15, 16, and 17, mist applicators 15, 16, and 17, conversion presses CP 22 and CP 23, post repair spray application, EU 805, videojet printers, EU 503, clean up operations, etc.).

I. The 300 Line Post Repair Spray Application Cure Ovens are limited to firing only on natural gas. The owner or operator shall maintain records of the types of fuels fired in 300 Line Post Repair Spray Application Cure Ovens.

Plant-wide Monitoring

- J. On a daily basis, the owner or operator shall record the identification and amount of all VOC/HAP containing material used at Silgan Containers Manufacturing (Facility ID: 94-01-040) (including end seal compound liners, mist applicators, conversion presses, post repair spray applications, videojet printers, clean-up operations, etc.) in gallons. The amount of VOC/HAP containing material used shall be determined either by direct measurement or shall be determined by the daily production rates of can ends and tabs. If the amount is determined by production rates, the owner or operator shall maintain records on the amount of can ends and tabs produced daily and the application rates of VOC/HAP containing material per can end and tab.
- K. The owner or operator shall record the VOC content, in pounds per gallon, of all VOC/HAP containing material used at Silgan Containers Manufacturing (Facility ID: 94-01-040).
- L. The owner or operator shall record the single HAP content, in pounds per gallon, of all VOC/HAP containing material used at Silgan Containers Manufacturing (Facility ID: 94-01-040).
- M. The owner or operator shall record the total HAP content, in pounds per gallon, of all VOC/HAP containing material used at Silgan Containers Manufacturing (Facility ID: 94-01-040).
- N. On a monthly basis, the owner or operator shall calculate the total VOC emissions, in tons, from Silgan Containers Manufacturing (Facility ID: 94-01-040) during the previous month. On a monthly basis, the owner or operator shall also calculate the total VOC emissions, in tons, from Silgan Containers Manufacturing (Facility ID: 94-01-040) during the previous12-month period. Records for total VOC emissions shall be kept on monthly basis until the rolling 12-month total VOC emissions exceed 328 tons per year. At this point owner or operator shall immediately begin keeping a 365-day rolling total of the quantity of total VOC emissions emitted from Silgan Containers Manufacturing (Facility ID: 94-01-040) in tons. The calculation frequency shall revert back to a monthly basis once the rolling 365-day total VOC emissions are below 328 tons. Note, the total VOC emission tracking requirements apply to all sources of VOC emissions from Silgan Containers Manufacturing (Facility ID: 94-01-040).
 - a. In determining total VOC, individual HAP, and total HAP emissions from 300 Line Post Repair Spray Application (EU 805), owner and operator shall assume 98 percent of the VOC/HAP containing material used in the 300 Line Post Repair Spray Application is destroyed in the RTO.
 - b. In determining total VOC, individual HAP, and total HAP emissions from 211 Line Post Repair Spray Application (EU 800), owner and operator shall assume 98 percent of the VOC/HAP containing material used in the 211 Line Post Repair Spray Application is destroyed in the RTO.

- O. On a monthly basis, the owner or operator shall calculate the single HAP emissions, in tons, from Silgan Containers Manufacturing (Facility ID: 94-01-040) during the previous month. On a monthly basis, the owner or operator shall also calculate the single HAP emissions, in tons, from Silgan Containers Manufacturing (Facility ID: 94-01-040) during the previous12-month period. Records for single HAP emissions shall be kept on monthly basis until the rolling 12-month single HAP emissions exceed 7.5 tons per year. At this point owner or operator shall immediately begin keeping a 365-day rolling total of the quantity of single HAP emissions emitted from Silgan Containers Manufacturing (Facility ID: 94-01-040) in tons. The calculation frequency shall revert back to a monthly basis once the rolling 365-day single HAP emissions are below 7.5 tons. Note, the single HAP emission tracking requirements apply to all sources of HAP emissions from Silgan Containers Manufacturing (Facility ID: 94-01-040).
 - a. In determining total VOC, individual HAP and total HAP emissions from 300 Line Post Repair Spray Application (EU 805), owner and operator shall assume 98 percent of the VOC/HAP containing material used in the 300 Line Post Repair Spray Application is destroyed in the RTO.
 - b. In determining total VOC, individual HAP and total HAP emissions from 211 Line Post Repair Spray Application (EU 800), owner and operator shall assume 98 percent of the VOC/HAP containing material used in the 211 Line Post Repair Spray Application is destroyed in the RTO.
- P. On a monthly basis, the owner or operator shall calculate the total HAP emissions, in tons, from Silgan Containers Manufacturing (Facility ID: 94-01-040) during the previous month. On a monthly basis, the owner or operator shall also calculate the total HAP emissions, in tons, from Silgan Containers Manufacturing (Facility ID: 94-01-040) during the previous12-month period. Records for total HAP emissions shall be kept on monthly basis until the rolling 12-month total HAP emissions exceed 20.0 tons per year. At this point owner or operator shall immediately begin keeping a 365-day rolling total of the quantity of total HAP emissions emitted from Silgan Containers Manufacturing (Facility ID: 94-01-040) in tons. The calculation frequency shall revert back to a monthly basis once the rolling 365-day total HAP emissions are below 20.0 tons. Note, the total HAP emission tracking requirements apply to all sources of HAP emissions from Silgan Containers Manufacturing (Facility ID: 94-01-040).
 - a. In determining total VOC, individual HAP and total HAP emissions from 300 Line Post Repair Spray Application (EU 805), owner and operator shall assume 98 percent of the VOC/HAP containing material used in the 300 Line Post Repair Spray Application is destroyed in the RTO.
 - b. In determining total VOC, individual HAP and total HAP emissions from 211 Line Post Repair Spray Application (EU 800), owner and operator shall assume 98 percent of the VOC/HAP containing material used in the 211 Line Post Repair Spray Application is destroyed in the RTO.
- Q. The owner or operator shall retain Safety Data Sheets (SDS) for all VOC/HAP containing materials used at Silgan Containers Manufacturing (Facility ID: 94-01-040).

Project Number 11-413 Monitoring

- R. Per 567 IAC 33.3(18)"f"(4), the owner or operator shall:
 - a. Monitor the emission of any regulated NSR pollutant that could increase as a result of the project that is emitted by any emissions unit identified Project 11-413
 - b. Calculate the annual emissions, in tons per year on a calendar-year basis, for a period of five (5) years following resumption of regular operations and maintain a record of regular operations after the change.
 - c. Per 567 IAC 33.3(18)"f"(5), retain these records for a period of ten (10) years after the project is completed.
- S. Per 567 IAC 33.3(18)"g", the owner or operator shall make the information required to be documented and maintained pursuant to 567 IAC 33.3(18)"f" available for review upon request for inspection by the Department or the general public pursuant to the requirements for Title V operating permits contained in 567 IAC 22.107(6).

Control Equipment Monitoring

The owner or operator shall maintain the Air Screen Collection (CE 101) according to the manufacturer specifications and maintenance schedule. The owner or operator shall maintain a record of all inspections and maintenance and any resulting actions of the Air Screen Collection (CE 101).

Authority for Requirement: DNR Construction Permits 00-A-552-S4 and 07-A-1036-S3

Emission Point Characteristics

Each emission point shall conform to the specifications listed below.

Stack Height, (ft, from the ground): 27 Stack Opening, (inches): 24 x 36 Exhaust Flow Rate (scfm): 10,380 Exhaust Temperature (°F): 68

Discharge Style: Horizontal

Authority for Requirement: DNR Construction Permits 00-A-552-S4 and 07-A-1036-S3

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within 30 days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

The owner/operator of this equipment shall comply with the monitoring requirements listed below.				
Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂			
Facility Maintained Operation & Maintenance Plan Required? Relevant requirements of O & M Plan for this equipment: Particulate Matter (PM) and PM ₁₀	Yes 🗵 No 🗌			
Compliance Assurance Monitoring (CAM) Plan Required?	Yes □ No ⊠			

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

The data pertaining to the plan shall be maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

Authority for Requirement: 567 IAC 22.108(3)

Monitoring Requirements

EP 37 00-TV-035R4 1/1/2024

Emission Point ID Numbers: EP 702A, EP 702B

Associated Equipment

Associated Emission Unit ID Number: EU 702* Emissions Control Equipment ID Number: CE 103

Emissions Control Equipment Description: Air Screen Collection

Emission Point ID	Emission Unit ID	Emission Unit Description	Raw Material	Rated Capacity
EP 702A	EU 702*	Pneumatically Conveyed Scrap Steel Skeletons Collection –	Scrap Steel Body	14,236 lb/hr
EP 702B	EU /02	Process Stack Emissions	Plate	14,230 10/111

*Includes the following units:

Unit Description	Emission Unit ID
211 End Size Sig Shell Press	SP 9
300 End Size Sig Shell Press	SP 21
Conversion Press 10	CP 10
Conversion Press 11	CP 11
Conversion Press 22	CP 22
Conversion Press 23	CP 23

Applicable Requirements

Emission Limits (lb/hr, gr/dscf, lb./MMBtu, % opacity, etc.)

The emissions from each emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit(s): 40% (1)

Authority for Requirement: DNR Construction Permits 03-A-703-S2 and 07-A-1037-S1

567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (PM) Emission Limit(s): 0.1 gr/dscf

Authority for Requirement: DNR Construction Permits 03-A-703-S2 and 07-A-1037-S1

567 IAC 23.3(2)"a"

⁽¹⁾An exceedance of the indicator opacity of 10% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter (PM) Emission Limit(s): 3.29 lb/hr (2)

Authority for Requirement: DNR Construction Permits 03-A-703-S2 and 07-A-1037-S1

(2) Emission limit established to restrict potential emissions from Scrap Aluminum Skeletons Collection (EU 702). Limit established over both emission points, EP 702A and EP 702B.

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit(s): 410 tons/yr

Authority for Requirement: DNR Construction Permit 03-A-703-S2 and 07-A-1037-S1

Pollutant: Hazardous Air Pollutant (Single HAP)

Emission Limit(s): 9.4 tons/yr

Authority for Requirement: DNR Construction Permit 03-A-703-S2 and 07-A-1037-S1

Pollutant: Hazardous Air Pollutant (Total HAP)

Emission Limit(s): 24.4 tons/yr

Authority for Requirement: DNR Construction Permit 03-A-703-S2 and 07-A-1037-S1

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

Control equipment parameters:

A. The Air Screen Collection (CE 102) shall be operated and maintained according to manufacturer specifications and maintenance schedule.

Authority for Requirement: DNR Construction Permits 03-A-703-S2 and 07-A-1037-S1

Reporting & Record keeping:

Records shall be kept on-site for at least five (5) years and shall be available for inspection by the Department. Records shall be maintained in a legible and orderly manner and shall indicate the following:

A. Maintain a record of all inspections/maintenance and any actions resulting from the inspection/maintenance of the Air Screen Collection (CE 102).

Authority for Requirement: DNR Construction Permits 03-A-703-S2 and 07-A-1037-S1

Emission Point Characteristics

Each emission point shall conform to the specifications listed below.

Stack Height, (ft, from the ground): 26.5 Stack Opening, (inches, dia.): 24 x 24 Exhaust Flow Rate (scfm): 7,120 Exhaust Temperature (°F): Ambient

Discharge Style: Horizontal

Authority for Requirement: DNR Construction Permits 03-A-703-S2 and 07-A-1037-S1

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within 30 days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

Monitoring Requirements

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required? Relevant requirements of O & M Plan for this equipment:	Yes 🛛 No 🗌
Particulate Matter (PM) and PM ₁₀	
Compliance Assurance Monitoring (CAM) Plan Required?	Yes □ No ⊠

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

The data pertaining to the plan shall be maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

Authority for Requirement: 567 IAC 22.108(3)

EP 40 00-TV-035R4 1/1/2024

Emission Point ID Number: EP 703

Associated Equipment

Associated Emission Unit ID Number: EU 703* Emissions Control Equipment ID Number: CE 106 Emissions Control Equipment Description: Cyclone

Emission Unit vented through this Emission Point: EU 703*

Emission Unit Description: Scrap Steel Tab Slug Collection – Process Stack Emissions

Raw Material/Fuel: Steel Rated Capacity: 3,000 lb/hr *Includes the following units:

Emission Unit	Emission Unit ID	Maximum Capacity
DRT Conversion Press 10	CP 10	1,650 ends per minute
DRT Conversion Press 11	CP 11	1,650 ends per minute
Stolle Conversion Press 22	CP 22	1,650 ends per minute
Stolle Conversion Press 23	CP 23	1,650 ends per minute

Applicable Requirements

Emission Limits (lb/hr, gr/dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit(s): 40% (1)

Authority for Requirement: DNR Construction Permit 07-A-1002-S2

567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (PM) Emission Limit(s): 0.1 gr/dscf

Authority for Requirement: DNR Construction Permit 07-A-1002-S2

567 IAC 23.3(2)"a"

⁽¹⁾An exceedance of the indicator opacity of 25% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Operational Limits & Record keeping Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

Records shall be kept on site for at least five years and shall be available for inspection by the Department.

- A. The Cyclone (CE 106) shall be operated and maintained according to the manufacturer's specifications with inspections occurring at a minimum of once per year. The owner or operator shall maintain a log of all maintenance and inspection activities performed on the Cyclone (CE 106). This log shall include, but is not necessarily limited to:
 - a. The date and time any inspection and/or maintenance was performed on the Cyclone (CE 106);
 - b. Any issues identified during the inspection and the date each issue was resolved;
 - c. Any issues addressed during the maintenance activities and the date each issue was resolved;
 - d. Identification of the staff member performing the maintenance or inspection.

Authority for Requirement: DNR Construction Permit 07-A-1002-S2

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height, (ft, from the ground): 33 Stack Opening, (inches, dia.): 24 x 60 Exhaust Flow Rate (scfm): 2,800 Exhaust Temperature (°F): 68 Discharge Style: Downward

Authority for Requirement: DNR Construction Permit 07-A-1002-S2

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within 30 days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

EP 42 00-TV-035R4 1/1/2024

The owner/operator of this equipment shall comply with the monitoring below.	g requirements listed
Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required? Relevant requirements of O & M Plan for this equipment: Particulate Matter (PM) and PM ₁₀	Yes 🛛 No 🗌
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

The data pertaining to the plan shall be maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

Authority for Requirement: 567 IAC 22.108(3)

Monitoring Requirements

EP 43 00-TV-035R4 1/1/2024

Emission Point ID Number: EP 800

Associated Equipment

Associated Emission Unit ID Number: EU 800 Emissions Control Equipment ID Number: CE 102

Emissions Control Equipment Description: Two Chamber Regenerative Thermal Oxidizer

(Max Heat Input: 1.0 MMBtu/hr)

Emission Point ID	Emission Unit ID	Emission Unit Description	Raw Material	Rated Capacity
EP 800	EU 800	211 Line Post Repair Spray Application – Process Stack Emissions Post Repair Spray Coater 1 - 5 5 Natural Gas Fired Curing Ovens	Various Coatings Natural Gas	800 ends/min (each) 0.4 MMBtu/hr (each)

Applicable Requirements

Emission Limits (lb/hr, gr/dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit(s): 40% (1)

Authority for Requirement: DNR Construction Permit 02-A-332-S3

567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (PM) Emission Limit(s): 0.01 gr/dscf

Authority for Requirement: DNR Construction Permit 02-A-332-S3

567 IAC 23.4(13)

Pollutant: Volatile Organic Compounds (VOC) and Hazardous Air Pollutant (HAP)

Emission Limit(s): 98% Destruction Efficiency

Authority for Requirement: DNR Construction Permit 02-A-332-S3

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit(s): 410 tons/yr

Authority for Requirement: DNR Construction Permit 02-A-332-S3

EP 44 00-TV-035R4 1/1/2024

⁽¹⁾An exceedance of the indicator opacity of "no visible emissions" will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Hazardous Air Pollutant (Single HAP)

Emission Limit(s): 9.4 tons/yr

Authority for Requirement: DNR Construction Permit 02-A-332-S3

Pollutant: Hazardous Air Pollutant (Total HAP)

Emission Limit(s): 24.4 tons/yr

Authority for Requirement: DNR Construction Permit 02-A-332-S3

Operational Limits & Reporting/Record keeping Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

Records shall be kept on site for at least five years and shall be available for inspection by the Department.

- A. Owner and operator shall operate Regenerative Thermal Oxidizer (CE 102) to achieve a minimum of 98 percent destruction efficiency of VOC/HAP emissions from 211 Line Post Repair Spray Application (EU 800).
- B. Owner and operator shall maintain Regenerative Thermal Oxidizer (CE 102) to a temperature (3-hour average) during operation of no lower than 10 degrees Fahrenheit of the average temperature recorded during the most recent performance test which demonstrated compliance with the emission limits.
- C. Owner and operator shall operate Regenerative Thermal Oxidizer (CE 102) at all times 211 Line Post Repair Spray Application (EU 800) is operating.
- D. Regenerative Thermal Oxidizer (CE 102) shall be fired by natural gas, process off gases and combustion air.
- E. Maintain Regenerative Thermal Oxidizer (CE 102) according to manufacturer specifications and maintenance schedule.
- F. 211 Line Post Repair Spray Application Cure Ovens are limited to firing on natural gas only.
- G. The owner and operator shall maintain and record the 3-hour block average of the operating temperature associated with Regenerative Thermal Oxidizer (CE 102) in degrees F.
- H. Maintain records of the types of fuels fired in Regenerative Thermal Oxidizer (CE 102).
- I. Maintain a record of all inspections/maintenance and any action resulting from the inspection/maintenance of Regenerative Thermal Oxidizer (CE 102).
- J. Maintain records of the types of fuels fired in 211 Line Post Repair Spray Application Cure Ovens.

Plant-wide Monitoring

A. Record daily, the identification and amount of all VOC/HAP containing material used at Silgan Containers Manufacturing, Plant No. 94-01-040 (including end seal compound liners, mist applicators, conversion presses, post repair spray applications, videojet printers, clean up operations, etc.) in gallons. The amount of VOC/HAP containing material used shall be

- determined either by direct measurement or shall be determined by the daily production rates of can ends and tabs. If the amount is determined by production rates, the permittee shall maintain records on the amount of can ends and tabs produced daily and the application rates of VOC/HAP containing material per can end and tab.
- B. Record the VOC content of all VOC/HAP containing material used at Silgan Containers Manufacturing, Plant No. 94-01-040 in pounds per gallon..
- C. Record the individual HAP content of all VOC/HAP containing material used at Silgan Containers Manufacturing, Plant No. 94-01-040 in pounds per gallon..
- D. Record the total HAP content of all VOC/HAP containing material used at Silgan Containers Manufacturing, Plant No. 94-01-040 in pounds per gallon.
- E. Calculate total VOC emissions in tons from Silgan Containers Manufacturing, Plant No. 94-01-040 on a monthly basis and keep rolling 12-month totals. Records for total VOC emissions shall be kept on monthly basis until time that total VOC emissions exceed 350 tons per year. At this point owner or operator shall immediately begin keeping a 365-day rolling total of the quantity of total VOC emissions emitted from Silgan Containers Manufacturing, Plant No. 94-01-040 in tons. Calculation requirements will revert back to a monthly basis if the 365-day rolling total is returned below 350 tons per year for total VOC emissions. Note, total VOC emission recording requirements encompass all sources of VOC emissions from Silgan Containers Manufacturing, Plant No. 94-01-040.
 - i In determining total VOC, individual HAP and Total HAP emissions from 300 Line Post Repair Spray Application (EU 805), owner and operator shall assume 98 percent of the VOC/HAP containing material used in the 300 Line Post Repair Spray Application is destroyed in the RTO.
 - ii In determining total VOC, individual HAP and Total HAP emissions from 211 Line Post Repair Spray Application (EU 800), owner and operator shall assume 98 percent of the VOC/HAP containing material used in the 211 Line Post Repair Spray Application is destroyed in the RTO.
- J. Calculate Single HAP emissions in tons from Silgan Containers Manufacturing, Plant No. 94-01-040 on a monthly basis and keep rolling 12-month totals. Records for Single HAP emissions shall be kept on monthly basis until time that Single HAP emissions exceed 8.0 tons per year. At this point owner or operator shall immediately begin keeping a 365-day rolling total of the quantity of Single HAP emissions emitted from Silgan Containers Manufacturing, Plant No. 94-01-040 in tons. Calculation requirements will revert back to a monthly basis if the 365-day rolling total is returned below 8.0 tons per year for Single HAP emissions. Note, Single HAP emission recording requirements encompass all sources of Single HAP emissions from Silgan Containers Manufacturing, Plant No. 94-01-040.
 - i In determining total VOC, individual HAP and total HAP emissions from 300 Line Post Repair Spray Application (EU 805), owner and operator shall assume 98 percent of the VOC/HAP containing material used in the 300 Line Post Repair Spray Application is destroyed in the RTO.
 - ii In determining total VOC, individual HAP and total HAP emissions from 211 Line Post Repair Spray Application (EU 800), owner and operator shall assume 98 percent of the VOC/HAP containing material used in the 211 Line Post Repair Spray Application is

destroyed in the RTO.

- K. Calculate total HAP emissions in tons from Silgan Containers Manufacturing, Plant No. 94-01-040 on a monthly basis and keep rolling 12-month totals. Records for total HAP emissions shall be kept on monthly basis until time that total HAP emissions exceed 20.70 tons per year. At this point owner or operator shall immediately begin keeping a 365-day rolling total of the quantity of total HAP emissions emitted from Silgan Containers Manufacturing, Plant No. 94-01-040 in tons. Calculation requirements will revert back to a monthly basis if the 365-day rolling total is returned below 20.70 tons per year for total HAP emissions. Note, total HAP emission recording requirements encompass all sources of total HAP emissions from Silgan Containers Manufacturing, Plant No. 94-01-040.
 - i In determining total VOC, individual HAP and total HAP emissions from 300 Line Post Repair Spray Application (EU 805), owner and operator shall assume 98 percent of the VOC/HAP containing material used in the 300 Line Post Repair Spray Application is destroyed in the RTO.
 - ii In determining total VOC, individual HAP and total HAP emissions from 211 Line Post Repair Spray Application (EU 800), owner and operator shall assume 98 percent of the VOC/HAP containing material used in the 211 Line Post Repair Spray Application is destroyed in the RTO.
- L. Retain Material Safety Data Sheets (MSDS) for VOC/HAP containing materials used at Silgan Containers Manufacturing, Plant No. 94-01-040.

Authority for Requirement: DNR Construction Permit 02-A-332-S3

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height, (ft, from the ground): 42 Stack Opening, (inches, dia.): 38.3 Exhaust Flow Rate (scfm): 8,900 Exhaust Temperature (°F): 225

Discharge Style: Vertical Unobstructed

Authority for Requirement: DNR Construction Permit 02-A-332-S3

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within 30 days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

Monitoring Requirements The owner/operator of this equipment shall comply with the monitoring rebelow.	requirements listed
Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🛛 No 🗌
Authority for Requirement: 567 IAC 22.108(3)	

EP 48 00-TV-035R4 1/1/2024

Silgan Containers Manufacturing Corporation Fort Dodge, Iowa Compliance Assurance Monitoring Plan (CAM)

Ship & Shore Regenerative Thermal Oxidizer (RTO) for VOC Control for 211 Post Coat Line

I. Background

A. Emissions Unit

Description: 211 End Post Coat Repair Spray Line

Identification: 211 Post Coat (EU 800) Thermal Oxidizer (CE 102)

Emission Unit Control Device Emission Point EU 800 ----->CE 102---->EP 800

B. Applicable Regulation, Emission Unit, and Monitoring

Requirements Regulation No.: Title V Permit

Regulated Pollutant (PSEU): VOC

Emissions Limit: Reduction to meet emission limits for Hazardous Air Pollutants in avoidance of 40 CFR Part 63 Subpart KKKK - NESHAPS for Surface Coating of Metal Cans. Monitoring requirements in permit: The owner and operator shall maintain Regenerative Thermal Oxidizer (CE 102) to a temperature (3-hour average) during operation of no lower than 10 degrees Fahrenheit of the average temperature recorded during the most recent performance test which demonstrated compliance.

C. Control Technology: Regenerative Thermal Oxidizer

Coating emissions from the 211 End Post Repair Spray coater are controlled by the Ship & Shore Regenerative Thermal Oxidizer. The infeed mechanisms on the post coaters are interlocked with the temperature controller on the oxidizer and are stopped if the oxidizer temperature drops below the set point.

II. Monitoring Approach

Please see the attached table for the key elements of the monitoring approach.

Table 1. Monitoring approach

Indicator	Oxidizer Temperature	Work Practice
	The combustion bed	Inspection and maintenance of
Measurement Approach	temperature is	the burners and combustion bed
	monitored with a	is conducted annually
	thermocouple.	by a 3 rd party vendor.
Indicator Range	The combustion bed temperature must be maintained above 1500 degrees F. An excursion is a temperature below 1500 degrees F.	An excursion is defined as a failure to perform the annual inspection.
Data representativeness	The thermocouple is located in the combustion bed as an integral part of the oxidizer design. The thermocouple is designed to be accurate within +/- 5%. The minimum chart recorder sensitivity (minor division) is 20 ⁰ F.	The thermocouple is replaced annually by 3 rd party vendor.
QA/QC	The accuracy of the thermocouple will be verified by a second, or redundant thermocouple inserted into the combustion bed with a hand held meter. This validation check will be performed at least annually. The acceptance criterion is +/- 5%.	NA
Monitoring Frequency	Measured continuously.	Annual inspection of the unit.
Data Collection Procedures	The temperature is recorded continuously on chart paper.	Record results of daily and periodic inspections.
Averaging Period	No average is taken.	NA

III. Monitoring Approach Justification

A. Background

Silgan Containers manufactures metal cans and ends for the food processing industry at the Fort Dodge, IA facility. The Post Coat repair spray process begins with converted can ends (pull-tab attached) that are forwarded to a feeding tower which supplies ends to an impulse movement conveyor that transfers the end to the spray application station. The impulse movement allows the end to advance and stop exactly at the damaged area of the score line, thereby allowing for optimal material usage generating minimal waste. The repair spray is applied by means of an applicator gun with a specially designed nozzle, which rotates commonly with the gun head copying the exact geometry of the score line. The gun head rotates by means of two eccentrics that are driven simultaneously by a belt conveyor.

The repaired ends are then conveyed to a multi-chamber natural gas-fired curing oven that allows the coating to cure and cool prior to being discharged for packaging.

The repair spray machines are enclosed in a Permanent Total Enclosure (PTE) as defined by the USEPA in Method 204 *Criteria for and Verification of a Permanent or Temporary Total Enclosure* (See Appendix G). The PTE includes the spray machines and their respective discharge conveyors from the point of application to the infeed of the curing oven. The PTE provides for one hundred percent (100%) capture efficiency from the repair spray operation. The exhaust from the PTE and the curing ovens is directed to the Ship & Shore Regenerative Thermal Oxidizer.

B. Rationale for Selection of Performance Indicators

Destruction Efficiency (DE) - The combustion bed temperature was chosen because it is indicative of the destruction efficiency of the unit.

Work Practice Standards - The work practice portion of the CAM plan is comprised of periodic checks and an annual inspection to determine the operating integrity and condition of the unit.

C. Rationale for Selection of Indicator Ranges

The selected indicator range for the combustion bed temperature is greater than 1500° F when the process is operating. The minimum operating temperature was

determined by efficiency testing of the unit. When an excursion occurs the repair spray line process is curtailed by the interlocking of the can feed mechanism with the control panel of the oxidizer. The feed mechanism will be automatically shut down if the oxidizer temperature drops below 1500^{0} F and will not be restarted until the temperature is raised above the minimum set point.

The air operating permit issued by the State specifies that the "Owner and Operator shall maintain the RTO (CE102) to a temperature (3-hour average) during operation of no lower than 10 degrees Fahrenheit of the average temperature recorded during the most recent compliance test. The permit requirement is to achieve a minimum of 98% destruction efficiency of VOC/HAP emissions. The oxidizer uses a natural gas fired burner and temperature controller to maintain the combustion bed temperature.

The unit typically operates in the 1500^{0} to 1550^{0} F range with solvent loading.

The most recent performance test of this oxidizer was conducted on August 7, 2003 by Air Compliance Consultants using EPA Method 25A. Three one-hour test runs were conducted with the coating line operating at normal full capacity. During the performance test the combustion bed temperature was measured continuously and recorded on a circular chart. During the three runs the unit achieved an average DE of 98.74%.

Work Practice Standards – It is important to make sure that the burner is operating properly to provide a secondary source of heat to maintain the proper temperature of the combustion bed.

An annual inspection to determine the operating integrity and condition of the unit will ensure that the device will continue to operate trouble-free.

Emission Point ID Number: EP 805

Associated Equipment

Associated Emission Unit ID Numbers: See Table Below

Emissions Control Equipment ID Number: CE 105

Emissions Control Equipment Description: Two Chamber Regenerative Thermal Oxidizer (Heat Input 3.1 MMBtu/hr)

Emission Unit	Description	Maximum Capacity	Emission Unit	Description	Maximum Capacity
Stolle Rotary	Liner 1	1,200 ends per	Mist Spray	Mister 15	1,200 ends per
End		minute	Applicator 15		minute
Compound					
Line 1					
Stolle Rotary	Liner 2	1,200 ends per	Mist Spray	Mister 16	1,200 ends per
End		minute	Applicator 16		minute
Compound					
Liner 2					
End	Liner 5	1,250 ends per	Mist Spray	Mister 17	1,200 ends per
Compound		minute	Applicator 17		minute
Liner 5					
End	Liner 6	1,250 ends per	Mist Spray	Mister 20	600 ends per
Compound		minute	Applicator 20		minute
Liner 6					
End	Liner 7	1,250 ends per	Mist Spray	Mister 21	1,250 ends per
Compound		minute	Applicator 21		minute
Liner 7					
End	Liner 8	1,250 ends per	Mist Spray	Mister 22	1,250 ends per
Compound		minute	Applicator 22		minute
Liner 8					
End	Liner 15	1,200 ends per	Burhke	CP 4	680 ends per
Compound		minute	Conversion		minute
Liner 15			Press 4		
End	Liner 16	1,200 ends per	Stolle	CP 5	2,200 ends per
Compound		minute	Conversion		minute
Liner 16			Press 5		
End	Liner 17	1,200 ends per	Stolle	CP 6	2,200 ends per
Compound		minute	Conversion		minute
Liner 17			Press 6		
Rotary End	Liner 20	600 ends per	Stolle 4-out	CP 7	2,200 ends per
Compound		minute	Conversion		minute
Liner 20		1.550	Press 7	C.T. 0	2.200
End	Liner 21	1,250 ends per	Conversion	CP 8	2,200 ends per
Compound		minute	Press		minute
Liner 21					

End	Liner 22	1,250 ends per	Spam	CP 20	1,000 ends per
Compound		minute	Conversion		minute
Liner 22			Press 20		
Mist Spray	Mister 5	1,250 ends per	Stolle	CP 22	1,650 ends per
Applicator 5		minute	Conversion		minute
Applicator 3			Press 22		
Mist Spray	Mister 6	1,250 ends per	Stolle	CP 23	1,650 ends per
Mist Spray Applicator 6		minute	Conversion		minute
Applicator o			Press 23		
Mist Spray	Mister 7	1,250 ends per	Clean up	EU 400	NA
Applicator 7		minute	Operations		
Mist Consy	Mister 8	1,250 ends per	Video Jet Ink	EU 503	2,400 ends per
Mist Spray		minute	Marking (12		minute
Applicator 8			units)		
			Natural Gas-	EU 600	NA
			Fired		
			Equipment		

Applicable Requirements

Emission Limits (lb/hr, gr/dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit(s): 40% (1)

Authority for Requirement: DNR Construction Permit 07-A-1003-S5

567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (PM) Emission Limit(s): 0.01 gr/scf

Authority for Requirement: DNR Construction Permit 07-A-1003-S5

567 IAC 23.4(13)

Pollutant: Sulfur Dioxide (SO₂) Emission Limit(s): 500 ppmv

Authority for Requirement: DNR Construction Permit 07-A-1003-S5

567 IAC 23.3(3)

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit(s): 34.04 tons/yr⁽²⁾

Authority for Requirement: DNR Construction Permit 07-A-1003-S5

⁽¹⁾An exceedance of the indicator opacity of "no visible emissions" will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

⁽²⁾ This limit applies to the following emission units: Liner 1, Liner 2, Liner 20, Mister 20, Conversion Press CP8, and VideoJet Ink Marking (EU 503).

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit(s): 100 tons/yr⁽³⁾

Authority for Requirement: DNR Construction Permit 07-A-1003-S5

(3) This limit applies to the following emission units: 300 Full Panel Easy Open (FPEO) End Line (Stolle Conversion Press 22, Stolle Conversion Press 23, End Compound Liner 15, End Compound Liner 16, End Compound Liner 17, Mist Spray Applicator 15, Mist Spray Applicator 16, Mist Spray Applicator 17, Clean Up Solvents, Video Jet Ink Making, and Natural Gas-Fired Equipment.

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit(s): 410 tons/yr

Authority for Requirement: DNR Construction Permit 07-A-1003-S5

Pollutant: Hazardous Air Pollutant (Single HAP)

Emission Limit(s): 9.4 tons/yr

Authority for Requirement: DNR Construction Permit 07-A-1003-S5

Pollutant: Hazardous Air Pollutant (Total HAP)

Emission Limit(s): 24.4 tons/yr

Authority for Requirement: DNR Construction Permit 07-A-1003-S5

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

Project Number 19-013 Monitoring

- A. On a daily basis, the owner or operator shall record the identification and amount of all VOC containing material used in the units associated with Project Number 19-013 (including Liner 1, Liner 2, Liner 20, Mister 20, Conversion Press 8, and all VideoJet Printers (EU503)) in gallons. The amount of VOC/HAP containing material used shall be determined either by direct measurement or shall be determined by the daily production rates of can ends and tabs. If the amount is determined by production rates, the owner or operator shall maintain records on the amount of can ends and tabs produced daily and the application rates of VOC containing material per can end and tab.
- B. The owner or operator shall record the VOC content of each VOC containing material used in the units associated with Project Number 19-013 (including Liner 1, Liner 2, Liner 20, Mister 20, Conversion Press 8, and all VideoJet Printers (EU 503)) in pounds per gallon.
- C. On a monthly basis, the owner or operator shall calculate the total VOC emissions, in tons, from the units associated with Project Number 19-013 (including Liner 1, Liner 2, Liner 20, Mister 20, Conversion Press 8, and all VideoJet Printers (EU 503)) during the previous month. On a monthly basis, the owner or operator shall also calculate the total VOC emissions, in tons, from the units associated with Project Number 19-013 (including Liner 1, Liner 2, Liner 20, Mister 20, Conversion Press 8, and all VideoJet Printers (EU 503)) during the previous12-month period. Records for total VOC emissions shall be kept on monthly basis until the rolling 12-month total VOC emissions exceed 27.2 tons per year. At this point owner or operator shall immediately begin keeping a

365-day rolling total of the quantity of total VOC emissions emitted from the units associated with Project Number 19-013 (including Liner 1, Liner 2, Liner 20, Mister 20, Conversion Press 8, and all VideoJet Printers (EU 503)) in tons. The calculation frequency shall revert back to a monthly basis once the rolling 365-day total VOC emissions are below 27.2 tons.

- a. In determining total VOC emissions from the units associated with Project Number 19-013 (including Liner 1, Liner 2, Liner 20, Mister 20, Conversion Press 8, and all VideoJet Printers (EU 503)), the owner and operator shall assume that 85 percent of the VOC containing material is captured by the RTO. The remaining 15 percent shall be assumed to be emitted uncontrolled through EP EF2. The owner or operator shall assume that 98 percent of the captured VOC containing material used in the in the units associated with Project Number 19-013 (including Liner 1, Liner 2, Liner 20, Mister 20, Conversion Press 8, and all VideoJet Printers (EU 503)) shall be destroyed in the RTO.
- D. The owner or operator shall retain Safety Data Sheets (SDS) for VOC/HAP containing materials used in the units associated with Project Number 19-013 (including Liner 1, Liner 2, Liner 20, Mister 20, Conversion Press 8, and all VideoJet Printers (EU 503)).

300 FPEO End Line Monitoring

- E. On a daily basis, the owner or operator shall record the identification and amount of all VOC/HAP containing material used in 300 FPEO End Line (including end seal compound liners 15, 16, and 17, mist applicators 15, 16, and 17, conversion presses CP 22 and CP 23, post repair spray application, EU 805, videojet printers, EU 503, clean up operations, etc.) in gallons. The amount of VOC/HAP containing material used shall be determined either by direct measurement or shall be determined by the daily production rates of can ends and tabs. If the amount is determined by production rates, the owner or operator shall maintain records on the amount of can ends and tabs produced daily and the application rates of VOC/HAP containing material per can end and tab.
- F. The owner or operator shall record the VOC content of each VOC/HAP containing material used in 300 FPEO End Line (including end seal compound liners 15, 16, and 17, mist applicators 15, 16, and 17, conversion presses CP22 and CP23, post repair spray application, EU 805, videojet printers, EU 503, clean up operations, etc.) in pounds per gallon.
- G. On a monthly basis, the owner or operator shall calculate the total VOC emissions, in tons, from the 300 FPEO End Line (including end seal compound liners 15, 16, and 17, mist applicators 15, 16, and 17, conversion presses CP22 and CP23, post repair spray application, EU 805, videojet printers, EU 503, clean up operations, etc.) during the previous month. On a monthly basis, the owner or operator shall also calculate the total VOC emissions, in tons, from the 300 FPEO End Line (including end seal compound liners 15, 16, and 17, mist applicators 15, 16, and 17, conversion presses CP 22 and CP 23, post repair spray application, EU 805, videojet printers, EU 503, clean up operations, etc.) during the previous12-month period. Records for total VOC emissions shall be kept on monthly basis until the rolling 12-month total VOC emissions exceed 85.0 tons per year. At this point owner or operator shall immediately begin keeping a 365-day rolling total of the quantity of total VOC emissions emitted from the 300 FPEO End Line

(including end seal compound liners 15, 16, and 17, mist applicators 15, 16, and 17, conversion presses CP 22 and CP 23, post repair spray application, EU 805, videojet printers, EU 503, clean up operations, etc.) in tons. The calculation frequency shall revert back to a monthly basis once the rolling 365-day total VOC emissions are below 85.0 tons.

- a. In determining total VOC, individual HAP and Total HAP emissions from 300 Line Post Repair Spray Application (EU 805), owner and operator shall assume 98 percent of the VOC/HAP containing material used in the 300 Line Post Repair Spray Application is destroyed in the RTO.
- H. The owner or operator shall retain Safety Data Sheets (SDS) for VOC/HAP containing materials used in 300 FPEO End Line (including end seal compound liners 15, 16, and 17, mist applicators 15, 16, and 17, conversion presses CP 22 and CP 23, post repair spray application, EU 805, videojet printers, EU 503, clean up operations, etc.).
- I. The 300 Line Post Repair Spray Application Cure Ovens are limited to firing only on natural gas. The owner or operator shall maintain records of the types of fuels fired in 300 Line Post Repair Spray Application Cure Ovens.

Plant-wide Monitoring

- J. On a daily basis, the owner or operator shall record the identification and amount of all VOC/HAP containing material used at Silgan Containers Manufacturing (Facility ID: 94-01-040) (including end seal compound liners, mist applicators, conversion presses, post repair spray applications, videojet printers, clean-up operations, etc.) in gallons. The amount of VOC/HAP containing material used shall be determined either by direct measurement or shall be determined by the daily production rates of can ends and tabs. If the amount is determined by production rates, the owner or operator shall maintain records on the amount of can ends and tabs produced daily and the application rates of VOC/HAP containing material per can end and tab.
- K. The owner or operator shall record the VOC content, in pounds per gallon, of all VOC/HAP containing material used at Silgan Containers Manufacturing (Facility ID: 94-01-040).
- L. The owner or operator shall record the single HAP content, in pounds per gallon, of all VOC/HAP containing material used at Silgan Containers Manufacturing (Facility ID: 94-01-040).
- M. The owner or operator shall record the total HAP content, in pounds per gallon, of all VOC/HAP containing material used at Silgan Containers Manufacturing (Facility ID: 94-01-040).
- N. On a monthly basis, the owner or operator shall calculate the total VOC emissions, in tons, from Silgan Containers Manufacturing (Facility ID: 94-01-040) during the previous month. On a monthly basis, the owner or operator shall also calculate the total VOC emissions, in tons, from Silgan Containers Manufacturing (Facility ID: 94-01-040) during the previous12-month period. Records for total VOC emissions shall be kept on monthly basis until the rolling 12-month total VOC emissions exceed 328 tons per year. At this point owner or operator shall immediately begin keeping a 365-day rolling total of the quantity of total VOC emissions emitted from Silgan Containers Manufacturing (Facility ID: 94-01-040) in tons. The calculation frequency shall revert back to a monthly basis

once the rolling 365-day total VOC emissions are below 328 tons. Note, the total VOC emission tracking requirements apply to all sources of VOC emissions from Silgan Containers Manufacturing (Facility ID: 94-01-040).

- a. In determining total VOC, individual HAP, and total HAP emissions from 300 Line Post Repair Spray Application (EU 805), owner and operator shall assume 98 percent of the VOC/HAP containing material used in the 300 Line Post Repair Spray Application is destroyed in the RTO.
- b. In determining total VOC, individual HAP, and total HAP emissions from 211 Line Post Repair Spray Application (EU 800), owner and operator shall assume 98 percent of the VOC/HAP containing material used in the 211 Line Post Repair Spray Application is destroyed in the RTO.
- O. On a monthly basis, the owner or operator shall calculate the single HAP emissions, in tons, from Silgan Containers Manufacturing (Facility ID: 94-01-040) during the previous month. On a monthly basis, the owner or operator shall also calculate the single HAP emissions, in tons, from Silgan Containers Manufacturing (Facility ID: 94-01-040) during the previous12-month period. Records for single HAP emissions shall be kept on monthly basis until the rolling 12-month single HAP emissions exceed 7.5 tons per year. At this point owner or operator shall immediately begin keeping a 365-day rolling total of the quantity of single HAP emissions emitted from Silgan Containers Manufacturing (Facility ID: 94-01-040) in tons. The calculation frequency shall revert back to a monthly basis once the rolling 365-day single HAP emissions are below 7.5 tons. Note, the single HAP emission tracking requirements apply to all sources of HAP emissions from Silgan Containers Manufacturing (Facility ID: 94-01-040).
 - a. In determining total VOC, individual HAP and total HAP emissions from 300 Line Post Repair Spray Application (EU 805), owner and operator shall assume 98 percent of the VOC/HAP containing material used in the 300 Line Post Repair Spray Application is destroyed in the RTO.
 - b. In determining total VOC, individual HAP and total HAP emissions from 211 Line Post Repair Spray Application (EU 800), owner and operator shall assume 98 percent of the VOC/HAP containing material used in the 211 Line Post Repair Spray Application is destroyed in the RTO.
- P. On a monthly basis, the owner or operator shall calculate the total HAP emissions, in tons, from Silgan Containers Manufacturing (Facility ID: 94-01-040) during the previous month. On a monthly basis, the owner or operator shall also calculate the total HAP emissions, in tons, from Silgan Containers Manufacturing (Facility ID: 94-01-040) during the previous12-month period. Records for total HAP emissions shall be kept on monthly basis until the rolling 12-month total HAP emissions exceed 20.0 tons per year. At this point owner or operator shall immediately begin keeping a 365-day rolling total of the quantity of total HAP emissions emitted from Silgan Containers Manufacturing (Facility ID: 94-01-040) in tons. The calculation frequency shall revert back to a monthly basis once the rolling 365-day total HAP emissions are below 20.0 tons. Note, the total HAP emission tracking requirements apply to all sources of HAP emissions from Silgan Containers Manufacturing (Facility ID: 94-01-040).
 - a. In determining total VOC, individual HAP and total HAP emissions from 300 Line Post Repair Spray Application (EU 805), owner and operator shall assume

- 98 percent of the VOC/HAP containing material used in the 300 Line Post Repair Spray Application is destroyed in the RTO.
- b. In determining total VOC, individual HAP and total HAP emissions from 211 Line Post Repair Spray Application (EU 800), owner and operator shall assume 98 percent of the VOC/HAP containing material used in the 211 Line Post Repair Spray Application is destroyed in the RTO.
- Q. The owner or operator shall retain Safety Data Sheets (SDS) for all VOC/HAP containing materials used at Silgan Containers Manufacturing (Facility ID: 94-01-040).

Project Number 11-413 Monitoring

- R. Per 567 IAC 33.3(18)"f"(4), the owner or operator shall:
 - a. Monitor the emission of any regulated NSR pollutant that could increase as a result of the project that is emitted by any emissions unit established with project 11-413.
 - b. Calculate the annual emissions, in tons per year on a calendar-year basis, for a period of five (5) years following resumption of regular operations and maintain a record of regular operations after the change.
 - c. Per 567 IAC 33.3(18)"f"(5), retain these records for a period of ten (10) years after the project is completed.
- S. Per 567 IAC 33.3(18)"g", the owner or operator shall make the information required to be documented and maintained pursuant to 567 IAC 33.3(18)"f" available for review upon request for inspection by the Department or the general public pursuant to the requirements for Title V operating permits contained in 567 IAC 22.107(6).

NESHAP Requirements

- T. The owner or operator shall not:
 - a. Perform paint stripping using methylene chloride (MeCl) for the removal of dried paint; or
 - b. Perform spray application of coatings that contain any of the following target HAP: cadmium (Cd), chromium (Cr), lead (Pb), manganese (Mn), and nickel (Ni).

Control Equipment Monitoring

- U. The owner or operator shall operate the Regenerative Thermal Oxidizer (CE 105) to achieve a minimum of 98 percent destruction efficiency of VOC/HAP emissions from the 300 Line Post Repair Spray Application and the 307 Ends Line. The owner or operator shall maintain the Regenerative Thermal Oxidizer (CE 105) afterburner combustion chamber's temperature to at least the manufacturer's recommended temperature but no less than 1,500 degrees Fahrenheit (F). The owner or operator shall:
 - a. Monitoring the operating temperature associated with Regenerative Thermal Oxidizer (CE 105) afterburner combustion chamber in degrees Fahrenheit (F) on a continuous basis; and

- b. Record the operating temperature associated with Regenerative Thermal Oxidizer (CE 105) afterburner combustion chamber in degrees Fahrenheit (F) at a minimum frequency of every six (6) minutes.
- V. The owner or operator shall operate the Regenerative Thermal Oxidizer (CE 105) at all times the 300 Line Post Repair Spray Application or 307 Ends Line is operating.
- W. The Regenerative Thermal Oxidizer (CE 105) shall be fired by natural gas, process off gases, and combustion air. The owner or operator shall maintain records of the types of fuels fired in the Regenerative Thermal Oxidizer (CE 105).
- X. The owner or operator shall maintain the Regenerative Thermal Oxidizer (CE 105) according to the manufacturer specifications and maintenance schedule. The owner or operator shall maintain a record of all inspections and maintenance and any resulting actions of the Regenerative Thermal Oxidizer (CE 105).

Authority for Requirement: DNR Construction Permit 07-A-1003-S5

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height, (ft, from the ground): 35 Stack Opening, (inches, dia.): 28 Exhaust Flow Rate (scfm): 6,100 Exhaust Temperature (°F): 220

Discharge Style: Vertical Unobstructed

Authority for Requirement: DNR Construction Permit 07-A-1003-S5

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within 30 days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

Monitoring Requirements

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🛛 No 🗌
Authority for Requirement: 567 IAC 22.108(3)	

EP 60 00-TV-035R4 1/1/2024

Silgan Containers Manufacturing Corporation Fort Dodge, Iowa Compliance Assurance Monitoring Plan (CAM)

Anguil Regenerative Thermal Oxidizer (RTO) for VOC Control for 300 Post Coat
Line

I. Background

A. Emissions Unit

Description: 300 End Post Coat Repair Spray Line

Identification: 300 Post Coat (EU 805) Thermal Oxidizer (CE 105)

Emission Unit	Control Device	Emission Point
EU 805	>CE-105	>EP 800
Liner 1	>CE-105	>EP 800
Liner 2	>CE-105	>EP 800
Liner 21	>CE-105	>EP 800
Liner 22	>CE-105	>EP 800
Mister 21	>CE-105	>EP 800
Mister 22	>CE-105	>EP 800

B. Applicable Regulation, Emission Unit, and Monitoring

Requirements Regulation No.: Title V Permit

Regulated Pollutant (PSEU): VOC

Emissions Limit: Reduction to meet emission limits for Hazardous Air Pollutants in avoidance of 40 CFR Part 63 Subpart KKKK - NESHAPS for Surface Coating of Metal Cans. Monitoring requirements in permit: The owner and operator shall maintain Regenerative Thermal Oxidizer (CE 105) to a temperature (3-hour average) during operation of no lower than 10 degrees Fahrenheit of the average temperature recorded during the most recent performance test which demonstrated compliance.

C. Control Technology: Regenerative Thermal Oxidizer

Coating emissions from the 300 End Post Repair Spray coater and the 307 end compound liners 1,2,21,22 and Misters 21,22 are controlled by the Anguil Regenerative Thermal Oxidizer. The infeed mechanisms on the post coaters and liners are interlocked with the temperature controller on the oxidizer and are stopped if the oxidizer temperature drops below the set point.

II. Monitoring Approach

Please see the attached table for the key elements of the monitoring approach.

Table 1. Monitoring approach

Indicator Indicator	Oxidizer Temperature	Work Practice
Measurement Approach	The combustion bed temperature is monitored with a thermocouple.	Inspection and maintenance of the burners and combustion bed is conducted annually by a 3 rd party vendor.
Indicator Range	The combustion bed temperature must be maintained above 1500 degrees F. An excursion is a temperature below 1500 degrees F.	An excursion is defined as a failure to perform the annual inspection.
Data representativeness	The thermocouple is located in the combustion bed as an integral part of the oxidizer design. The thermocouple is designed to be accurate within +/-5%. The minimum chart recorder sensitivity (minor division) is 20° F.	The thermocouple is replaced annually by 3 rd party vendor.
QA/QC	The accuracy of the thermocouple will be verified by a second, or redundant thermocouple inserted into the combustion bed with a hand held meter. This validation check will be performed at least annually. The acceptance criterion is +/- 5%.	NA
Monitoring Frequency	Measured continuously.	Annual inspection of the unit.
Data Collection Procedures	The temperature is recorded continuously in an electronic data logger.	Record results of daily and periodic inspections.
Averaging Period	No average is taken.	NA

III. Monitoring Approach Justification

A. Background

Silgan Containers manufactures metal cans and ends for the food processing industry at the Fort Dodge, IA facility. The Post Coat repair spray process begins with converted can ends (pull-tab attached) that are forwarded to a feeding tower which supplies ends to an impulse movement conveyor that transfers the end to the spray application station. The impulse movement allows the end to advance and stop exactly at the damaged area of the score line, thereby allowing for optimal material usage generating minimal waste. The repair spray is applied by means of an applicator gun with a specially designed nozzle, which rotates commonly with the gun head copying the exact geometry of the score line. The gun head rotates by means of two eccentrics that are driven simultaneously by a belt conveyor.

The repaired ends are then conveyed to a multi-chamber natural gas-fired curing oven that allows the coating to cure and cool prior to being discharged for packaging.

Additionally, 307 size end compound liners 1, 2, 21 and 22 are controlled by the Anguil RTO. For end manufacturing, the process begins with pre-coated coils of aluminum as raw material. The coils are then fed to a multi-die shell press where metal can ends (shells) are stamped and formed. The shells are conveyed to compound liner(s) where the channel around the perimeter of each end is filled or lined with an end sealing compound (gasket type material). The end compound acts as a gasket to seal the filled contents of the can and prevent contamination of the canned food when the end is applied to the can body. The end compound is a special blend of rubber particles, clay, resins, and solvents. The compound applicator nozzles must be kept clean to prevent an excessive build-up of compound. Therefore, a fine mist of cleaning solvent is sprayed intermittently on the nozzles to keep them clean. The equipment that applies this solvent is known as a "mister". The lined ends are then conveyed to an induction curing oven prior to being discharged for packaging.

The repair spray machines are enclosed in a Permanent Total Enclosure (PTE) as defined by the USEPA in Method 204 *Criteria for and Verification of a Permanent or Temporary Total Enclosure* (See Appendix G). The PTE includes the spray machines and their respective discharge conveyors from the point of application to the infeed of the curing oven. The PTE provides for one hundred percent (100%) capture efficiency from the repair spray operation. The exhaust from the PTE and the curing ovens is directed to the Anguil Regenerative Thermal Oxidizer.

Emissions from end sealing compound and mister solvent typically are air cured. However, for Liners 1, 2, 21, 22 and Misters 21, 22 exhaust from the induction curing ovens are directed to the Anguil Thermal Oxidizer.

B. Rationale for Selection of Performance Indicators

Destruction Efficiency (DE) - The combustion bed temperature was chosen because it is indicative of the destruction efficiency of the unit.

Work Practice Standards - The work practice portion of the CAM plan is comprised of periodic checks and an annual inspection to determine the operating integrity and condition of the unit.

C. Rationale for Selection of Indicator Ranges

The selected indicator range for the combustion bed temperature is greater than 1500^{0} F when the process is operating. The minimum operating temperature was determined by efficiency testing of the unit. When an excursion occurs the repair spray line process is curtailed by the interlocking of the can feed mechanism with the control panel of the oxidizer. The feed mechanism will be automatically shut down if the oxidizer temperature drops below 1500^{0} F and will not be restarted until the temperature is raised above the minimum set point.

The air operating permit issued by the State specifies that the "Owner and Operator shall maintain the RTO (CE 102) to a temperature (3-hour average) during operation of no lower than 10 degrees Fahrenheit of the average temperature recorded during the most recent compliance test. The permit requirement is to achieve a minimum of 98% destruction efficiency of VOC/HAP emissions. The oxidizer uses a natural gas fired burner and temperature controller to maintain the combustion bed temperature.

The unit typically operates in the 1500° to 1550° F range with solvent loading.

The most recent performance test of this oxidizer was conducted on October 11, 2012 by Air Compliance Consultants using EPA Method 25A. Three one-hour test runs were conducted with the coating line operating at normal full capacity. During the performance test the combustion bed temperature was measured continuously and recorded on a circular chart. During the three runs the unit achieved an average DE of 99.10%.

Work Practice Standards – It is important to make sure that the burner is operating properly to provide a secondary source of heat to maintain the proper temperature of the combustion bed.

An annual inspection to determine the operating integrity and condition of the unit will ensure that the device will continue to operate trouble-free.

Emission Point ID Number: EP 900

Associated Equipment

Associated Emission Unit ID Numbers: EU 900, EU 901

Emission Units vented through this Emission Point: EU 900, EU 901

Emission Unit Descriptions: 2 Spam End Compound Liners – Process Stack Emissions

Raw Material/Fuel: End Compound Liner Sealant

Rated Capacity: 16.91 lb/hr

Emission Unit Description: 2 Spam End Drying Ovens – Process Stack Emissions

Raw Material/Fuel: Natural Gas

Rated Capacity: 0.092 lb/MMBtu each

Applicable Requirements

Emission Limits (lb/hr, gr/dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit(s): 40% (1)

Authority for Requirement: DNR Construction Permit 09-A-514-S3

567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (PM) Emission Limit(s): 0.1 gr/dscf

Authority for Requirement: DNR Construction Permit 09-A-514-S3

567 IAC 23.3(2)"a"

Pollutant: Sulfur Dioxide (SO₂) Emission Limit(s): 500 ppmv

Authority for Requirement: DNR Construction Permit 09-A-514-S3

567 IAC 23.3(3)

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit(s): 410 tons/yr

Authority for Requirement: DNR Construction Permit 09-A-514-S3

⁽¹⁾An exceedance of the indicator opacity of "no visible emissions" will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Hazardous Air Pollutant (Single HAP)

Emission Limit(s): 9.4 tons/yr

Authority for Requirement: DNR Construction Permit 09-A-514-S3

Pollutant: Hazardous Air Pollutant (Total HAP)

Emission Limit(s): 24.4 tons/yr

Authority for Requirement: DNR Construction Permit 09-A-514-S3

Operational Limits & Reporting/Record keeping Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

Records shall be kept on site for at least five years and shall be available for inspection by the Department.

- A. The owner or operator shall only combust natural gas in the Spam Line #1 drying ovens.
- B. On a daily basis, the owner or operator shall record the identification and amount of all VOC/HAP containing material used at Silgan Containers Manufacturing (Facility ID: 94-01-040) (including end seal compound liners, mist applicators, conversion presses, post repair spray applications, videojet printers, clean-up operations, etc.) in gallons. The amount of VOC/HAP containing material used shall be determined either by direct measurement or shall be determined by the daily production rates of can ends and tabs. If the amount is determined by production rates, the owner or operator shall maintain records on the amount of can ends and tabs produced daily and the application rates of VOC/HAP containing material per can end and tab.
- C. The owner or operator shall record the VOC content, in pounds per gallon, of all VOC/HAP containing material used at Silgan Containers Manufacturing (Facility ID: 94-01-040).
- D. The owner or operator shall record the single HAP content, in pounds per gallon, of all VOC/HAP containing material used at Silgan Containers Manufacturing (Facility ID: 94-01-040).
- E. The owner or operator shall record the total HAP content, in pounds per gallon, of all VOC/HAP containing material used at Silgan Containers Manufacturing (Facility ID: 94-01-040).
- F. On a monthly basis, the owner or operator shall calculate the total VOC emissions, in tons, from Silgan Containers Manufacturing (Facility ID: 94-01-040) during the previous month. On a monthly basis, the owner or operator shall also calculate the total VOC emissions, in tons, from Silgan Containers Manufacturing (Facility ID: 94-01-040) during the previous12-month period. Records for total VOC emissions shall be kept on monthly basis until the rolling 12-month total VOC emissions exceed 328 tons per year. At this point owner or operator shall immediately begin keeping a 365-day rolling total of the quantity of total VOC emissions emitted from Silgan Containers Manufacturing (Facility ID: 94-01-040) in tons. The calculation frequency shall revert back to a monthly basis once the rolling 365-day total VOC emissions are below 328 tons. Note, the total VOC emission tracking requirements apply to all sources of VOC emissions from Silgan Containers Manufacturing (Facility ID: 94-01-040).
 - a. In determining total VOC, individual HAP, and total HAP emissions from 300 Line Post Repair Spray Application (EU 805), owner and operator shall assume

- 98 percent of the VOC/HAP containing material used in the 300 Line Post Repair Spray Application is destroyed in the RTO.
- b. In determining total VOC, individual HAP, and total HAP emissions from 211 Line Post Repair Spray Application (EU 800), owner and operator shall assume 98 percent of the VOC/HAP containing material used in the 211 Line Post Repair Spray Application is destroyed in the RTO.
- G. On a monthly basis, the owner or operator shall calculate the single HAP emissions, in tons, from Silgan Containers Manufacturing (Facility ID: 94-01-040) during the previous month. On a monthly basis, the owner or operator shall also calculate the single HAP emissions, in tons, from Silgan Containers Manufacturing (Facility ID: 94-01-040) during the previous12-month period. Records for single HAP emissions shall be kept on monthly basis until the rolling 12-month single HAP emissions exceed 7.5 tons per year. At this point owner or operator shall immediately begin keeping a 365-day rolling total of the quantity of single HAP emissions emitted from Silgan Containers Manufacturing (Facility ID: 94-01-040) in tons. The calculation frequency shall revert back to a monthly basis once the rolling 365-day single HAP emissions are below 7.5 tons. Note, the single HAP emission tracking requirements apply to all sources of HAP emissions from Silgan Containers Manufacturing (Facility ID: 94-01-040).
 - a. In determining total VOC, individual HAP and total HAP emissions from 300 Line Post Repair Spray Application (EU 805), owner and operator shall assume 98 percent of the VOC/HAP containing material used in the 300 Line Post Repair Spray Application is destroyed in the RTO.
 - b. In determining total VOC, individual HAP and total HAP emissions from 211 Line Post Repair Spray Application (EU 800), owner and operator shall assume 98 percent of the VOC/HAP containing material used in the 211 Line Post Repair Spray Application is destroyed in the RTO.
- H. On a monthly basis, the owner or operator shall calculate the total HAP emissions, in tons, from Silgan Containers Manufacturing (Facility ID: 94-01-040) during the previous month. On a monthly basis, the owner or operator shall also calculate the total HAP emissions, in tons, from Silgan Containers Manufacturing (Facility ID: 94-01-040) during the previous12-month period. Records for total HAP emissions shall be kept on monthly basis until the rolling 12-month total HAP emissions exceed 20.0 tons per year. At this point owner or operator shall immediately begin keeping a 365-day rolling total of the quantity of total HAP emissions emitted from Silgan Containers Manufacturing (Facility ID: 94-01-040) in tons. The calculation frequency shall revert back to a monthly basis once the rolling 365-day total HAP emissions are below 20.0 tons. Note, the total HAP emission tracking requirements apply to all sources of HAP emissions from Silgan Containers Manufacturing (Facility ID: 94-01-040).
 - a. In determining total VOC, individual HAP and total HAP emissions from 300
 Line Post Repair Spray Application (EU 805), owner and operator shall assume
 98 percent of the VOC/HAP containing material used in the 300 Line Post Repair
 Spray Application is destroyed in the RTO.
 - b. In determining total VOC, individual HAP and total HAP emissions from 211 Line Post Repair Spray Application (EU 800), owner and operator shall assume

98 percent of the VOC/HAP containing material used in the 211 Line Post Repair Spray Application is destroyed in the RTO.

I. The owner or operator shall retain Safety Data Sheets (SDS) for all VOC/HAP containing materials used at Silgan Containers Manufacturing (Facility ID: 94-01-040).

Authority for Requirement: DNR Construction Permit 09-A-514-S3

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height, (ft, from the ground): 35

Stack Opening, (inches, dia.): 9 Exhaust Flow Rate (scfm): 177 Exhaust Temperature (°F): 190 Discharge Style: Vertical, Obstructed

Authority for Requirement: DNR Construction Permit 09-A-514-S3

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within 30 days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

Monitoring Requirements

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required? Authority for Requirement: 567 IAC 22.108(3)	Yes 🗌 No 🖂

Emission Point ID Number: EF 1

Associated Equipment

Emission Point ID	Emission Unit ID	Emission Unit Description	Raw Material	Rated Capacity
EF 1	EU 400	DRD Can Lines 1 & 2 – Clean up Operations – Process Fugitive Emissions	Various Cleaning Solvents	9.0 gal/hr
	EU 500	Videojet Ink Marking – Process Fugitive Emissions	Various Inks	1.09 lb/hr
	EU 600	Natural Gas Fired Equipment	Natural Gas	20.61 MMBtu/hr

Applicable Requirements

Emission Limits (lb/hr, gr/dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit(s): 40% (1)

Authority for Requirement: DNR Construction Permit 05-A-259-S1

567 IAC 23.3(2)"d"

(1)An exceedance of the indicator opacity of "no visible emissions" will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter (PM) Emission Limit(s): 0.01 gr/scf

Authority for Requirement: DNR Construction Permit 05-A-259-S1

567 IAC 23.4(13)

Pollutant: Sulfur Dioxide (SO₂) Emission Limit(s): 500 ppmv

Authority for Requirement: 567 IAC 23.3(3)

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit(s): 410 tons/yr

Authority for Requirement: DNR Construction Permit 05-A-259-S1

Pollutant: Hazardous Air Pollutant (Single HAP)

Emission Limit(s): 9.4 tons/yr

Authority for Requirement: DNR Construction Permit 05-A-259-S1

Pollutant: Hazardous Air Pollutant (Total HAP)

Emission Limit(s): 24.4 tons/yr

Authority for Requirement: DNR Construction Permit 05-A-259-S1

Operational Limits & Reporting/Record keeping Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

Records shall be kept on site for at least five years and shall be available for inspection by the Department.

- A. Record daily, the identification and amount of all VOC/HAP containing material used at Silgan Containers Manufacturing, Plant No. 94-01-040 (including end seal compound liners, mist applicators, conversion presses, post repair spray applications, videojet printers, clean up operations, etc.) in gallons. The amount of VOC/HAP containing material used shall be determined either by direct measurement or shall be determined by the daily production rates of can ends and tabs. If the amount is determined by production rates, the permittee shall maintain records on the amount of can ends and tabs produced daily and the application rates of VOC/HAP containing material per can end and tab.
- B. Record the VOC content of all VOC/HAP containing material used at Silgan Containers Manufacturing, Plant No. 94-01-040 in pounds per gallon..
- C. Record the individual HAP content of all VOC/HAP containing material used at Silgan Containers Manufacturing, Plant No. 94-01-040 in pounds per gallon.
- D. Record the total HAP content of all VOC/HAP containing material used at Silgan Containers Manufacturing, Plant No. 94-01-040 in pounds per gallon.
- E. Calculate total VOC emissions in tons from Silgan Containers Manufacturing, Plant No. 94-01-040 on a monthly basis and keep rolling 12-month totals. Records for total VOC emissions shall be kept on monthly basis until time that total VOC emissions exceed 350 tons per year. At this point owner or operator shall immediately begin keeping a 365-day rolling total of the quantity of total VOC emissions emitted from Silgan Containers Manufacturing, Plant No. 94-01-040 in tons. Calculation requirements will revert back to a monthly basis if the 365-day rolling total is returned below 350 tons per year for total VOC emissions. Note, total VOC emission recording requirements encompass all sources of VOC emissions from Silgan Containers Manufacturing, Plant No. 94-01-040.
 - i In determining total VOC, individual HAP and Total HAP emissions from 300 Line Post Repair Spray Application (EU 805), owner and operator shall assume 98 percent of the VOC/HAP containing material used in the 300 Line Post Repair Spray Application is destroyed in the RTO.
 - ii In determining total VOC, individual HAP and Total HAP emissions from 211 Line Post Repair Spray Application (EU 800), owner and operator shall assume 98 percent of the VOC/HAP containing material used in the 211 Line Post Repair Spray Application is destroyed in the RTO.

- F. Calculate Single HAP emissions in tons from Silgan Containers Manufacturing, Plant No. 94-01-040 on a monthly basis and keep rolling 12-month totals. Records for Single HAP emissions shall be kept on monthly basis until time that Single HAP emissions exceed 8.0 tons per year. At this point owner or operator shall immediately begin keeping a 365-day rolling total of the quantity of Single HAP emissions emitted from Silgan Containers Manufacturing, Plant No. 94-01-040 in tons. Calculation requirements will revert back to a monthly basis if the 365-day rolling total is returned below 8.0 tons per year for Single HAP emissions. Note, Single HAP emission recording requirements encompass all sources of Single HAP emissions from Silgan Containers Manufacturing, Plant No. 94-01-040.
 - i In determining total VOC, individual HAP and total HAP emissions from 300 Line Post Repair Spray Application (EU 805), owner and operator shall assume 98 percent of the VOC/HAP containing material used in the 300 Line Post Repair Spray Application is destroyed in the RTO.
 - ii In determining total VOC, individual HAP and total HAP emissions from 211 Line Post Repair Spray Application (EU 800), owner and operator shall assume 98 percent of the VOC/HAP containing material used in the 211 Line Post Repair Spray Application is destroyed in the RTO.
- G. Calculate total HAP emissions in tons from Silgan Containers Manufacturing, Plant No. 94-01-040 on a monthly basis and keep rolling 12-month totals. Records for total HAP emissions shall be kept on monthly basis until time that total HAP emissions exceed 20.70 tons per year. At this point owner or operator shall immediately begin keeping a 365-day rolling total of the quantity of total HAP emissions emitted from Silgan Containers Manufacturing, Plant No. 94-01-040 in tons. Calculation requirements will revert back to a monthly basis if the 365-day rolling total is returned below 20.70 tons per year for total HAP emissions. Note, total HAP emission recording requirements encompass all sources of total HAP emissions from Silgan Containers Manufacturing, Plant No. 94-01-040.
 - i In determining total VOC, individual HAP and total HAP emissions from 300 Line Post Repair Spray Application (EU 805), owner and operator shall assume 98 percent of the VOC/HAP containing material used in the 300 Line Post Repair Spray Application is destroyed in the RTO.
 - ii In determining total VOC, individual HAP and total HAP emissions from 211 Line Post Repair Spray Application (EU 800), owner and operator shall assume 98 percent of the VOC/HAP containing material used in the 211 Line Post Repair Spray Application is destroyed in the RTO.
- H. Retain Material Safety Data Sheets (MSDS) for VOC/HAP containing materials used at Silgan Containers Manufacturing, Plant No. 94-01-040.

Authority for Requirement: DNR Construction Permit 05-A-259-S1

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height, (ft, from the ground): 35.8

Stack Opening, (inches, dia.): 48.0 Exhaust Flow Rate (scfm): 30,000 Exhaust Temperature (°F): Ambient Discharge Style: Vertical Unobstructed

Authority for Requirement: DNR Construction Permit 05-A-259-S1

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within 30 days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

Monitoring Requirements

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🗵
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🗵
Compliance Assurance Monitoring (CAM) Plan Required?	Yes ☐ No ⊠

Authority for Requirement: 567 IAC 22.108(3)

EP

Emission Point ID Number: EF 2

Associated Equipment

Emission Point ID	Emission Unit ID	Emission Unit Description	Raw Material	Rated Capacity
	Liner 1	Stolle Rotary End Compound Liner 1		1,200 ends/min
	Liner 2	Stolle Rotary End Compound Liner 2		1,200 ends/min
	Liner 5	End Compound Liner 5		1,250 ends/min
	Liner 6	End Compound Liner 6		1,250 ends/min
	Liner 7	End Compound Liner 7	Various End	1,250 ends/min
	Liner 8	End Compound Liner 8	Sealing	1,250 ends/min
	Liner 20	Rotary End Compound Liner 20	Compounds	600 ends/min
	Liner 21	End Compound Liner 21		1,250 ends/min
	Liner 22	End Compound Liner 22		1,250 ends/min
	Mister 5	Mist Spray Applicator 5		1,250 ends/min
	Mister 6	Mist Spray Applicator 6	Various Mister	1,250 ends/min
	Mister 7	Mist Spray Applicator 7		1,250 ends/min
EF 2	Mister 8	Mist Spray Applicator 8		1,250 ends/min
	Mister 20	Mist Spray Applicator 20	Solvents	600 ends/min
	Mister 21	Mist Spray Applicator 21		1,250 ends/min
	Mister 22	Mist Spray Applicator 22		1,250 ends/min
	CP 4	Burhke Conversion Press 4	Various Tab Lubricants	680 ends/min
	CP 5	Stolle Conversion Press 5		2,200 ends/min
	CP 6	Stolle Conversion Press 6		2,200 ends/min
	CP 7	Stolle 4-out Conversion Press 7		2,200 ends/min
	CP 8	Conversion Press		2,200 ends/min
	CP 20	Spam Conversion Press 20		1,000 ends/min
	EU 400	Clean up Operations	Various Cleaning Solvents	NA
	EU 503	Video Ink Jet Marking 307 Line	Various Inks	2,400 ends/min
	EU 600	All Natural Gas Heating EF 1 – EF 9 (20.61 MMBtu/hr)	Natural Gas	NA

Applicable Requirements

Emission Limits (lb/hr, gr/dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit(s): 40% (1)

Authority for Requirement: DNR Construction Permit 05-A-260-S7

567 IAC 23.3(2)"d"

(1) An exceedance of the indicator opacity of "no visible emissions" will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter (PM) Emission Limit(s): 0.01 gr/scf

Authority for Requirement: DNR Construction Permit 05-A-260-S7

567 IAC 23.4(13)

Pollutant: Sulfur Dioxide (SO₂) Emission Limit(s): 500 ppm_v

Authority for Requirement: DNR Construction Permit 05-A-260-S7

567 IAC 23.3(3)"e"

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit(s): 34.04 tons/yr⁽²⁾

Authority for Requirement: DNR Construction Permit 05-A-260-S7

(2) This limit applies to the following emission units: Liner 1, Liner 2, Liner 20, Mister 20, Conversion Press

CP8, and VideoJet Ink Marking (EU 503).

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit(s): 410 tons/yr

Authority for Requirement: DNR Construction Permit 05-A-260-S7

Pollutant: Hazardous Air Pollutant (Single HAP)

Emission Limit(s): 9.4 tons/yr

Authority for Requirement: DNR Construction Permit 05-A-260-S7

Pollutant: Hazardous Air Pollutant (Total HAP)

Emission Limit(s): 24.4 tons/yr

Authority for Requirement: DNR Construction Permit 05-A-260-S7

Operational Limits & Reporting/Record keeping Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

Records shall be kept on site for at least five years and shall be available for inspection by the Department.

Project Number 19-013 Monitoring

- A. On a daily basis, the owner or operator shall record the identification and amount of all VOC containing material used in the units associated with Project Number 19-013 (including Liner 1, Liner 2, Liner 20, Mister 20, Conversion Press 8, and all VideoJet Printers (EU 503)) in gallons. The amount of VOC/HAP containing material used shall be determined either by direct measurement or shall be determined by the daily production rates of can ends and tabs. If the amount is determined by production rates, the owner or operator shall maintain records on the amount of can ends and tabs produced daily and the application rates of VOC containing material per can end and tab.
- B. The owner or operator shall record the VOC content of each VOC containing material used in the units associated with Project Number 19-013 (including Liner 1, Liner 2, Liner 20, Mister 20, Conversion Press 8, and all VideoJet Printers (EU 503)) in pounds per gallon.
- C. On a monthly basis, the owner or operator shall calculate the total VOC emissions, in tons, from the units associated with Project Number 19-013 (including Liner 1, Liner 2, Liner 20, Mister 20, Conversion Press 8, and all VideoJet Printers (EU 503)) during the previous month. On a monthly basis, the owner or operator shall also calculate the total VOC emissions, in tons, from the units associated with Project Number 19-013 (including Liner 1, Liner 2, Liner 20, Mister 20, Conversion Press 8, and all VideoJet Printers (EU 503)) during the previous12-month period. Records for total VOC emissions shall be kept on monthly basis until the rolling 12-month total VOC emissions exceed 27.2 tons per year. At this point owner or operator shall immediately begin keeping a 365-day rolling total of the quantity of total VOC emissions emitted from the units associated with Project Number 19-013 (including Liner 1, Liner 2, Liner 20, Mister 20, Conversion Press 8, and all VideoJet Printers (EU 503)) in tons. The calculation frequency shall revert back to a monthly basis once the rolling 365-day total VOC emissions are below 27.2 tons.
 - a. In determining total VOC emissions from the units associated with Project Number 19-013 (including Liner 1, Liner 2, Liner 20, Mister 20, Conversion Press 8, and all VideoJet Printers (EU 503)), the owner and operator shall assume that 85 percent of the VOC containing material is captured by the RTO. The remaining 15 percent shall be assumed to be emitted uncontrolled through EP EF2. The owner or operator shall assume that 98 percent of the captured VOC containing material used in the in the units associated with Project Number 19-013 (including Liner 1, Liner 2, Liner 20, Mister 20, Conversion Press 8, and all VideoJet Printers (EU 503)) shall be destroyed in the RTO.
- D. The owner or operator shall retain Safety Data Sheets (SDS) for VOC/HAP containing materials used in the units associated with Project Number 19-013 (including Liner 1, Liner 2, Liner 20, Mister 20, Conversion Press 8, and all VideoJet Printers (EU 503)).

<u>Plant-wide Monitoring</u>

- E. On a daily basis, the owner or operator shall record the identification and amount of all VOC/HAP containing material used at Silgan Containers Manufacturing (Facility ID: 94-01-040) (including end seal compound liners, mist applicators, conversion presses, post repair spray applications, videojet printers, clean-up operations, etc.) in gallons. The amount of VOC/HAP containing material used shall be determined either by direct measurement or shall be determined by the daily production rates of can ends and tabs. If the amount is determined by production rates, the owner or operator shall maintain records on the amount of can ends and tabs produced daily and the application rates of VOC/HAP containing material per can end and tab.
- F. The owner or operator shall record the VOC content, in pounds per gallon, of all VOC/HAP containing material used at Silgan Containers Manufacturing (Facility ID: 94-01-040).
- G. The owner or operator shall record the single HAP content, in pounds per gallon, of all VOC/HAP containing material used at Silgan Containers Manufacturing (Facility ID: 94-01-040).
- H. The owner or operator shall record the total HAP content, in pounds per gallon, of all VOC/HAP containing material used at Silgan Containers Manufacturing (Facility ID: 94-01-040).
- I. On a monthly basis, the owner or operator shall calculate the total VOC emissions, in tons, from Silgan Containers Manufacturing (Facility ID: 94-01-040) during the previous month. On a monthly basis, the owner or operator shall also calculate the total VOC emissions, in tons, from Silgan Containers Manufacturing (Facility ID: 94-01-040) during the previous12-month period. Records for total VOC emissions shall be kept on monthly basis until the rolling 12-month total VOC emissions exceed 328 tons per year. At this point owner or operator shall immediately begin keeping a 365-day rolling total of the quantity of total VOC emissions emitted from Silgan Containers Manufacturing (Facility ID: 94-01-040) in tons. The calculation frequency shall revert back to a monthly basis once the rolling 365-day total VOC emissions are below 328 tons. Note, the total VOC emission tracking requirements apply to all sources of VOC emissions from Silgan Containers Manufacturing (Facility ID: 94-01-040).
 - a. In determining total VOC, individual HAP, and total HAP emissions from 300 Line Post Repair Spray Application (EU 805), owner and operator shall assume 98 percent of the VOC/HAP containing material used in the 300 Line Post Repair Spray Application is destroyed in the RTO.
 - b. In determining total VOC, individual HAP, and total HAP emissions from 211 Line Post Repair Spray Application (EU 800), owner and operator shall assume 98 percent of the VOC/HAP containing material used in the 211 Line Post Repair Spray Application is destroyed in the RTO.
- J. On a monthly basis, the owner or operator shall calculate the single HAP emissions, in tons, from Silgan Containers Manufacturing (Facility ID: 94-01-040) during the previous month. On a monthly basis, the owner or operator shall also calculate the single HAP emissions, in tons, from Silgan Containers Manufacturing (Facility ID: 94-01-040) during the previous12-month period. Records for single HAP emissions shall be kept on monthly basis until the rolling 12-month single HAP emissions exceed 7.5 tons per year.

At this point owner or operator shall immediately begin keeping a 365-day rolling total of the quantity of single HAP emissions emitted from Silgan Containers Manufacturing (Facility ID: 94-01-040) in tons. The calculation frequency shall revert back to a monthly basis once the rolling 365-day single HAP emissions are below 7.5 tons. Note, the single HAP emission tracking requirements apply to all sources of HAP emissions from Silgan Containers Manufacturing (Facility ID: 94-01-040).

- a. In determining total VOC, individual HAP and total HAP emissions from 300 Line Post Repair Spray Application (EU 805), owner and operator shall assume 98 percent of the VOC/HAP containing material used in the 300 Line Post Repair Spray Application is destroyed in the RTO.
- b. In determining total VOC, individual HAP and total HAP emissions from 211 Line Post Repair Spray Application (EU 800), owner and operator shall assume 98 percent of the VOC/HAP containing material used in the 211 Line Post Repair Spray Application is destroyed in the RTO.
- K. On a monthly basis, the owner or operator shall calculate the total HAP emissions, in tons, from Silgan Containers Manufacturing (Facility ID: 94-01-040) during the previous month. On a monthly basis, the owner or operator shall also calculate the total HAP emissions, in tons, from Silgan Containers Manufacturing (Facility ID: 94-01-040) during the previous12-month period. Records for total HAP emissions shall be kept on monthly basis until the rolling 12-month total HAP emissions exceed 20.0 tons per year. At this point owner or operator shall immediately begin keeping a 365-day rolling total of the quantity of total HAP emissions emitted from Silgan Containers Manufacturing (Facility ID: 94-01-040) in tons. The calculation frequency shall revert back to a monthly basis once the rolling 365-day total HAP emissions are below 20.0 tons. Note, the total HAP emission tracking requirements apply to all sources of HAP emissions from Silgan Containers Manufacturing (Facility ID: 94-01-040).
 - a. In determining total VOC, individual HAP and total HAP emissions from 300 Line Post Repair Spray Application (EU 805), owner and operator shall assume 98 percent of the VOC/HAP containing material used in the 300 Line Post Repair Spray Application is destroyed in the RTO.
 - b. In determining total VOC, individual HAP and total HAP emissions from 211 Line Post Repair Spray Application (EU 800), owner and operator shall assume 98 percent of the VOC/HAP containing material used in the 211 Line Post Repair Spray Application is destroyed in the RTO.
- L. The owner or operator shall retain Safety Data Sheets (SDS) for all VOC/HAP containing materials used at Silgan Containers Manufacturing (Facility ID: 94-01-040).

Project Number 15-011 Monitoring

- M. Per 567 IAC 33.3(18)"f"(4), the owner or operator shall:
 - a. Monitor the emission of any regulated NSR pollutant that could increase as a result of the project that is emitted by any emissions unit established with Project 15-011.
 - b. Calculate the annual emissions, in tons per year on a calendar-year basis, for a period of five (5) years following resumption of regular operations and maintain a record of regular operations after the change.

- c. Per 567 IAC 33.3(18)"f"(5), retain these records for a period of ten (10) years after the project is completed.
- N. Per 567 IAC 33.3(18)"g", the owner or operator shall make the information required to be documented and maintained pursuant to 567 IAC 33.3(18)"f" available for review upon request for inspection by the Department or the general public pursuant to the requirements for Title V operating permits contained in 567 IAC 22.107(6).

Authority for Requirement: DNR Construction Permit 05-A-260-S7

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height, (ft, from the ground): 35.8

Stack Opening, (inches, dia.): 48 Exhaust Flow Rate (scfm): 30,000 Exhaust Temperature (°F): 68

Discharge Style: Vertical Unobstructed

Authority for Requirement: DNR Construction Permit 05-A-260-S7

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within 30 days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

Monitoring Requirements

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂

Authority for Requirement: 567 IAC 22.108(3)

Emission Point ID Number: EF 5

Associated Equipment

Emission Point ID	Emission Unit ID	Emission Unit Description	Raw Material	Rated Capacity
EF 5	CP 10	DRT Conversion Press 10	Various Tab	550 strokes/min
	CP 11	DRT Conversion Press 11	Lubricants	550 strokes/min
	EU 400	Plant-Wide Clean up Operations - Process Fugitive Emissions	Various Cleaning Solvents	See EF 1
	EU 502	Video Ink Marking – Process Fugitive Emissions	Various Inks	0.74 lb/hr
	EU 600	Natural Gas Combustion (20.61 MMBtu/hr)	Natural Gas	See EF 1

Applicable Requirements

Emission Limits (lb/hr, gr/dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit(s): 40% (1)

Authority for Requirement: DNR Construction Permit 05-A-261-S1

567 IAC 23.3(2)"d"

⁽¹⁾An exceedance of the indicator opacity of "no visible emissions" will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter (PM) Emission Limit(s): 0.01 gr/scf

Authority for Requirement: DNR Construction Permit 05-A-261-S1

567 IAC 23.4(13)

Pollutant: Sulfur Dioxide (SO₂) Emission Limit(s): 500 ppmv

Authority for Requirement: 567 IAC 23.3(3)

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit(s): 410 tons/yr

Authority for Requirement: DNR Construction Permit 05-A-261-S1

Pollutant: Hazardous Air Pollutant (Single HAP)

Emission Limit(s): 9.4 tons/yr

Authority for Requirement: DNR Construction Permit 05-A-261-S1

Pollutant: Hazardous Air Pollutant (Total HAP)

Emission Limit(s): 24.4 tons/yr

Authority for Requirement: DNR Construction Permit 05-A-261-S1

Operational Limits & Reporting/Record keeping Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

Records shall be kept on site for at least five years and shall be available for inspection by the Department.

- A. Record daily, the identification and amount of all VOC/HAP containing material used at Silgan Containers Manufacturing, Plant No. 94-01-040 (including end seal compound liners, mist applicators, conversion presses, post repair spray applications, videojet printers, clean up operations, etc.) in gallons. The amount of VOC/HAP containing material used shall be determined either by direct measurement or shall be determined by the daily production rates of can ends and tabs. If the amount is determined by production rates, the permittee shall maintain records on the amount of can ends and tabs produced daily and the application rates of VOC/HAP containing material per can end and tab.
- B. Record the VOC content of all VOC/HAP containing material used at Silgan Containers Manufacturing, Plant No. 94-01-040 in pounds per gallon.
- C. Record the individual HAP content of all VOC/HAP containing material used at Silgan Containers Manufacturing, Plant No. 94-01-040 in pounds per gallon.
- D. Record the total HAP content of all VOC/HAP containing material used at Silgan Containers Manufacturing, Plant No. 94-01-040 in pounds per gallon.
- E. Calculate total VOC emissions in tons from Silgan Containers Manufacturing, Plant No. 94-01-040 on a monthly basis and keep rolling 12-month totals. Records for total VOC emissions shall be kept on monthly basis until time that total VOC emissions exceed 350 tons per year. At this point owner or operator shall immediately begin keeping a 365-day rolling total of the quantity of total VOC emissions emitted from Silgan Containers Manufacturing, Plant No. 94-01-040 in tons. Calculation requirements will revert back to a monthly basis if the 365-day rolling total is returned below 350 tons per year for total VOC emissions. Note, total VOC emission recording requirements encompass all sources of VOC emissions from Silgan Containers Manufacturing, Plant No. 94-01-040.
 - i In determining total VOC, individual HAP and Total HAP emissions from 300 Line Post Repair Spray Application (EU 805), owner and operator shall assume 98 percent of the VOC/HAP containing material used in the 300 Line Post Repair Spray Application is destroyed in the RTO.
 - ii In determining total VOC, individual HAP and Total HAP emissions from 211 Line Post Repair Spray Application (EU 800), owner and operator shall assume 98 percent of the VOC/HAP containing material used in the 211 Line Post Repair Spray Application is destroyed in the RTO.

- F. Calculate Single HAP emissions in tons from Silgan Containers Manufacturing, Plant No. 94-01-040 on a monthly basis and keep rolling 12-month totals. Records for Single HAP emissions shall be kept on monthly basis until time that Single HAP emissions exceed 8.0 tons per year. At this point owner or operator shall immediately begin keeping a 365-day rolling total of the quantity of Single HAP emissions emitted from Silgan Containers Manufacturing, Plant No. 94-01-040 in tons. Calculation requirements will revert back to a monthly basis if the 365-day rolling total is returned below 8.0 tons per year for Single HAP emissions. Note, Single HAP emission recording requirements encompass all sources of Single HAP emissions from Silgan Containers Manufacturing, Plant No. 94-01-040.
 - i In determining total VOC, individual HAP and total HAP emissions from 300 Line Post Repair Spray Application (EU 805), owner and operator shall assume 98 percent of the VOC/HAP containing material used in the 300 Line Post Repair Spray Application is destroyed in the RTO.
 - ii In determining total VOC, individual HAP and total HAP emissions from 211 Line Post Repair Spray Application (EU 800), owner and operator shall assume 98 percent of the VOC/HAP containing material used in the 211 Line Post Repair Spray Application is destroyed in the RTO.
- G. Calculate total HAP emissions in tons from Silgan Containers Manufacturing, Plant No. 94-01-040 on a monthly basis and keep rolling 12-month totals. Records for total HAP emissions shall be kept on monthly basis until time that total HAP emissions exceed 20.70 tons per year. At this point owner or operator shall immediately begin keeping a 365-day rolling total of the quantity of total HAP emissions emitted from Silgan Containers Manufacturing, Plant No. 94-01-040 in tons. Calculation requirements will revert back to a monthly basis if the 365-day rolling total is returned below 20.70 tons per year for total HAP emissions. Note, total HAP emission recording requirements encompass all sources of total HAP emissions from Silgan Containers Manufacturing, Plant No. 94-01-040.
 - i In determining total VOC, individual HAP and total HAP emissions from 300 Line Post Repair Spray Application (EU 805), owner and operator shall assume 98 percent of the VOC/HAP containing material used in the 300 Line Post Repair Spray Application is destroyed in the RTO.
 - ii In determining total VOC, individual HAP and total HAP emissions from 211 Line Post Repair Spray Application (EU 800), owner and operator shall assume 98 percent of the VOC/HAP containing material used in the 211 Line Post Repair Spray Application is destroyed in the RTO.
- H. Retain Material Safety Data Sheets (MSDS) for VOC/HAP containing materials used at Silgan Containers Manufacturing, Plant No. 94-01-040.

Authority for Requirement: DNR Construction Permit 05-A-261-S1

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height, (ft, from the ground): 35.50

Stack Opening, (inches, dia.): 36.0 Exhaust Flow Rate (scfm): 30,000 Exhaust Temperature (°F): Ambient Discharge Style: Vertical Unobstructed

Authority for Requirement: DNR Construction Permit 05-A-261-S1

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within 30 days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

Monitoring Requirements

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂

Authority for Requirement: 567 IAC 22.108(3)

Emission Point ID Number: EF 6

Associated Equipment

Emission Point ID	Emission Unit ID	Emission Unit Description	Raw Material	Rated Capacity
EF 6	EU 400	Plant-Wide Clean up Operations – Process Fugitive Emissions	Various Cleaning Solvents	See EF 1
	EU 502	Video Ink Marking – Process Fugitive Emissions	Various Inks	0.74 lb/hr
	Liner 10	End Compound Liner 10	Various End Sealing Compounds Various Mister Solvents	1,500 ends per minute
	Liner 11	End Compound Liner 11		1,500 ends per minute
	Liner 12	End Compound Liner 12		1,500 ends per minute
	Mister 10	Mist Spray Applicator 10		1,500 ends per minute
	Mister 11	Mist Spray Applicator 11		1,500 ends per minute
	Mister 12	Mist Spray Applicator 12		1,500 ends per minute

Applicable Requirements

Emission Limits (lb/hr, gr/dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit(s): 40% (1)

Authority for Requirement: DNR Construction Permit 05-A-262-S2

567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (PM) Emission Limit(s): 0.01 gr/scf

Authority for Requirement: DNR Construction Permit 05-A-262-S2

567 IAC 23.4(13)

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit(s): 410 tons/yr

Authority for Requirement: DNR Construction Permit 05-A-262-S2

83

⁽¹⁾An exceedance of the indicator opacity of "no visible emissions" will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Hazardous Air Pollutant (Single HAP)

Emission Limit(s): 9.4 tons/yr

Authority for Requirement: DNR Construction Permit 05-A-262-S2

Pollutant: Hazardous Air Pollutant (Total HAP)

Emission Limit(s): 24.4 tons/yr

Authority for Requirement: DNR Construction Permit 05-A-262-S2

Operational Limits & Reporting and Recordkeeping Requirements

The owner/operator of this equipment shall comply with the requirements listed below. Records shall be kept on-site for at least five (5) years and shall be available for inspection by the Department. Records shall be maintained in a legible and orderly manner and shall indicate the following:

- A. Record daily, the identification and amount of all VOC/HAP containing material used at Silgan Containers Manufacturing, Plant No. 94-01-040 (including end seal compound liners, mist applicators, conversion presses, post repair spray applications, videojet printers, clean up operations, etc.), in gallons. The amount of VOC/HAP containing material used shall be determined either by direct measurement or shall be determined by the daily production rates of can ends and tabs. If the amount is determined by production rates, the permittee shall maintain records on the amount of can ends and tabs produced daily and the application rates of VOC/HAP containing material per can end and tab.
- B. Record the VOC content of all VOC/HAP containing material used at Silgan Containers Manufacturing, Plant No. 94-01-040, in pounds per gallon.
- C. Record the individual HAP content of all VOC/HAP containing material used at Silgan Containers Manufacturing, Plant No. 94-01-040, in pounds per gallon.
- D. Record the total HAP content of all VOC/HAP containing material used at Silgan Containers Manufacturing, Plant No. 94-01-040, in pounds per gallon.
- E. Calculate total VOC emissions in tons from Silgan Containers Manufacturing, Plant No. 94-01-040, on a monthly basis and keep rolling 12-month totals. Records for total VOC emissions shall be kept on monthly basis until time that total VOC emissions exceed 328 tons per year. At this point owner or operator shall immediately begin keeping a 365-day rolling total of the quantity of total VOC emissions emitted from Silgan Containers Manufacturing, Plant No. 94-01-040, in tons. Calculation requirements will revert back to a monthly basis if the 365-day rolling total is returned below 328 tons per year for total VOC emissions. Note, total VOC emission recording requirements encompass all sources of VOC emissions from Silgan Containers Manufacturing, Plant No. 94-01-040.
 - i. In determining total VOC, individual HAP and Total HAP emissions from 300 Line Post Repair Spray Application (EU 805), owner and operator shall assume 98 percent of the VOC/HAP containing material used in the 300 Line Post Repair Spray Application is destroyed in the RTO.
 - ii. In determining total VOC, individual HAP and Total HAP emissions from 211 Line Post Repair Spray Application (EU 800), owner and operator shall assume 98 percent of the VOC/HAP containing material used in the 211 Line Post Repair Spray Application is

destroyed in the RTO.

- F. Calculate Single HAP emissions in tons from Silgan Containers Manufacturing, Plant No. 94-01-040, on a monthly basis and keep rolling 12-month totals. Records for Single HAP emissions shall be kept on monthly basis until time that Single HAP emissions exceed 7.5 tons per year. At this point owner or operator shall immediately begin keeping a 365-day rolling total of the quantity of Single HAP emissions emitted from Silgan Containers Manufacturing, Plant No. 94-01-040, in tons. Calculation requirements will revert back to a monthly basis if the 365-day rolling total is returned below 7.5 tons per year for Single HAP emissions. Note, Single HAP emission recording requirements encompass all sources of Single HAP emissions from Silgan Containers Manufacturing, Plant No. 94-01-040.
 - i. In determining total VOC, individual HAP and total HAP emissions from 300 Line Post Repair Spray Application (EU 805), owner and operator shall assume 98 percent of the VOC/HAP containing material used in the 300 Line Post Repair Spray Application is destroyed in the RTO.
 - ii. In determining total VOC, individual HAP and total HAP emissions from 211 Line Post Repair Spray Application (EU 800), owner and operator shall assume 98 percent of the VOC/HAP containing material used in the 211 Line Post Repair Spray Application is destroyed in the RTO.
- G. Calculate total HAP emissions in tons from Silgan Containers Manufacturing, Plant No. 94-01-040, on a monthly basis and keep rolling 12-month totals. Records for total HAP emissions shall be kept on monthly basis until time that total HAP emissions exceed 20.0 tons per year. At this point owner or operator shall immediately begin keeping a 365-day rolling total of the quantity of total HAP emissions emitted from Silgan Containers Manufacturing, Plant No. 94-01-040, in tons. Calculation requirements will revert back to a monthly basis if the 365-day rolling total is returned below 20.0 tons per year for total HAP emissions. Note, total HAP emission recording requirements encompass all sources of total HAP emissions from Silgan Containers Manufacturing, Plant No. 94-01-040.
 - i. In determining total VOC, individual HAP and total HAP emissions from 300 Line Post Repair Spray Application (EU 805), owner and operator shall assume 98 percent of the VOC/HAP containing material used in the 300 Line Post Repair Spray Application is destroyed in the RTO.
 - ii. In determining total VOC, individual HAP and total HAP emissions from 211 Line Post Repair Spray Application (EU 800), owner and operator shall assume 98 percent of the VOC/HAP containing material used in the 211 Line Post Repair Spray Application is destroyed in the RTO.
- H. Retain Material Safety Data Sheets (MSDS) for VOC/HAP containing materials used at Silgan Containers Manufacturing, Plant No. 94-01-040.

Authority for Requirement: DNR Construction Permit 05-A-262-S2

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height, (ft, from the ground): 35.50

Stack Opening, (inches, dia.): 36.0 Exhaust Flow Rate (scfm): 30,000 Exhaust Temperature (°F): Ambient Discharge Style: Vertical Unobstructed

Authority for Requirement: DNR Construction Permit 05-A-262-S2

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within 30 days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

Monitoring Requirements

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes ☐ No ⊠

Authority for Requirement: 567 IAC 22.108(3)

Emission Point ID Number: EF 9

Associated Equipment

Emission Point ID	Emission Unit ID	Emission Unit Description	Raw Material	Rated Capacity
	CP 22	Stolle Conversion Press 22	Conversion Press 22 Various Tab	
	CP 23	Stolle Conversion Press 23	Lubricants	1,650 ends/min
EF 9	EU 400	Clean Up Solvents	Various Cleaning Solvents	NA
	EU 503	VideoJet Ink Marking (12 units)	Various Inks	2,400 ends/min
	EU 600	Natural Gas-Fired Equipment (20.61 MMBtu/hr)	Natural Gas	NA
	Liner 15	End Compound Liner 15	Various End	1,200 ends/min
	Liner 16	End Compound Liner 16	Sealing	1,200 ends/min
	Liner 17	End Compound Liner 17	Compounds	1,200 ends/min
	Mister 15	Mist Spray Applicator 15	Various Mister	1,200 ends/min
	Mister 16	Mist Spray Applicator 16	Solvents	1,200 ends/min
	Mister 17	Mist Spray Applicator 17	Solvenis	1,200 ends/min

Applicable Requirements

Emission Limits (lb/hr, gr/dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit(s): 40% (1)

Authority for Requirement: DNR Construction Permit 07-A-1000-S2

567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (PM) Emission Limit(s): 0.01 gr/scf

Authority for Requirement: DNR Construction Permit 07-A-1000-S2

567 IAC 23.4(13)

Pollutant: Sulfur Dioxide (SO₂) Emission Limit(s): 500 ppmv

Authority for Requirement: 567 IAC 23.3(3)

⁽¹⁾ An exceedance of the indicator opacity of "no visible emissions" will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit(s): 34.04 tons/yr⁽²⁾

Authority for Requirement: DNR Construction Permit 07-A-1000-S2

⁽²⁾ Established in Project Number 19-013 to limit project emissions below the PSD significance threshold. This limit applies to the following emission units: Liner 1, Liner 2, Liner 20, Mister 20, Conversion Press CP8, and VideoJet Ink Marking (EU 503).

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit(s): 100 tons/yr⁽³⁾

Authority for Requirement: DNR Construction Permit 07-A-1000-S2

(3) This limit applies to the 300 Full Panel Easy Open (FPEO) End Line (Stolle Conversion Press 22, Stolle Conversion Press 23, End Compound Liner 15, End Compound Liner 16, End Compound Liner 17, Mist Spray Applicator 15, Mist Spray Applicator 16, Mist Spray Applicator 17, Clean Up Solvents, Video Jet Ink Marking, and Natural Gas-Fired Equipment).

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit(s): 410 tons/yr

Authority for Requirement: DNR Construction Permit 07-A-1000-S2

Pollutant: Hazardous Air Pollutant (Single HAP)

Emission Limit(s): 9.4 tons/yr

Authority for Requirement: DNR Construction Permit 07-A-1000-S2

Pollutant: Hazardous Air Pollutant (Total HAP)

Emission Limit(s): 24.4 tons/yr

Authority for Requirement: DNR Construction Permit 07-A-1000-S2

Operational Limits & Reporting/Record keeping Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

Records shall be kept on site for at least five years and shall be available for inspection by the Department.

Project Number 19-013 Monitoring

- A. On a daily basis, the owner or operator shall record the identification and amount of all VOC containing material used in the units associated with Project Number 19-013 (including Liner 1, Liner 2, Liner 20, Mister 20, Conversion Press 8, and all VideoJet Printers (EU 503)) in gallons. The amount of VOC/HAP containing material used shall be determined either by direct measurement or shall be determined by the daily production rates of can ends and tabs. If the amount is determined by production rates, the owner or operator shall maintain records on the amount of can ends and tabs produced daily and the application rates of VOC containing material per can end and tab.
- B. The owner or operator shall record the VOC content of each VOC containing material used in the units associated with Project Number 19-013 (including Liner 1, Liner 2, Liner 20, Mister 20, Conversion Press 8, and all VideoJet Printers (EU 503)) in pounds per gallon.

- C. On a monthly basis, the owner or operator shall calculate the total VOC emissions, in tons, from the units associated with Project Number 19-013 (including Liner 1, Liner 2, Liner 20, Mister 20, Conversion Press 8, and all VideoJet Printers (EU 503)) during the previous month. On a monthly basis, the owner or operator shall also calculate the total VOC emissions, in tons, from the units associated with Project Number 19-013 (including Liner 1, Liner 2, Liner 20, Mister 20, Conversion Press 8, and all VideoJet Printers (EU 503)) during the previous12-month period. Records for total VOC emissions shall be kept on monthly basis until the rolling 12-month total VOC emissions exceed 27.2 tons per year. At this point owner or operator shall immediately begin keeping a 365-day rolling total of the quantity of total VOC emissions emitted from the units associated with Project Number 19-013 (including Liner 1, Liner 2, Liner 20, Mister 20, Conversion Press 8, and all VideoJet Printers (EU 503)) in tons. The calculation frequency shall revert back to a monthly basis once the rolling 365-day total VOC emissions are below 27.2 tons.
 - a. In determining total VOC emissions from the units associated with Project Number 19-013 (including Liner 1, Liner 2, Liner 20, Mister 20, Conversion Press 8, and all VideoJet Printers (EU 503)), the owner and operator shall assume that 85 percent of the VOC containing material is captured by the RTO. The remaining 15 percent shall be assumed to be emitted uncontrolled through EP EF2. The owner or operator shall assume that 98 percent of the captured VOC containing material used in the in the units associated with Project Number 19-013 (including Liner 1, Liner 2, Liner 20, Mister 20, Conversion Press 8, and all VideoJet Printers (EU 503)) shall be destroyed in the RTO.
- D. The owner or operator shall retain Safety Data Sheets (SDS) for VOC/HAP containing materials used in the units associated with Project Number 19-013 (including Liner 1, Liner 2, Liner 20, Mister 20, Conversion Press 8, and all VideoJet Printers (EU 503)).

300 FPEO End Line Monitoring

- E. On a daily basis, the owner or operator shall record the identification and amount of all VOC/HAP containing material used in 300 FPEO End Line (including end seal compound liners 15, 16, and 17, mist applicators 15, 16, and 17, conversion presses CP 22 and CP 23, post repair spray application, EU 805, videojet printers, EU 503, clean up operations, etc.) in gallons. The amount of VOC/HAP containing material used shall be determined either by direct measurement or shall be determined by the daily production rates of can ends and tabs. If the amount is determined by production rates, the owner or operator shall maintain records on the amount of can ends and tabs produced daily and the application rates of VOC/HAP containing material per can end and tab.
- F. The owner or operator shall record the VOC content of each VOC/HAP containing material used in 300 FPEO End Line (including end seal compound liners 15, 16, and 17, mist applicators 15, 16, and 17, conversion presses CP 22 and CP 23, post repair spray application, EU 805, videojet printers, EU 503, clean up operations, etc.) in pounds per gallon.
- G. On a monthly basis, the owner or operator shall calculate the total VOC emissions, in tons, from the 300 FPEO End Line (including end seal compound liners 15, 16, and 17, mist applicators 15, 16, and 17, conversion presses CP 22 and CP 23, post repair spray

application, EU 805, videojet printers, EU 503, clean up operations, etc.) during the previous month. On a monthly basis, the owner or operator shall also calculate the total VOC emissions, in tons, from the 300 FPEO End Line (including end seal compound liners 15, 16, and 17, mist applicators 15, 16, and 17, conversion presses CP 22 and CP 23, post repair spray application, EU805, videojet printers, EU 503, clean up operations, etc.) during the previous12-month period. Records for total VOC emissions shall be kept on monthly basis until the rolling 12-month total VOC emissions exceed 85.0 tons per year. At this point owner or operator shall immediately begin keeping a 365-day rolling total of the quantity of total VOC emissions emitted from the 300 FPEO End Line (including end seal compound liners 15, 16, and 17, mist applicators 15, 16, and 17, conversion presses CP 22 and CP 23, post repair spray application, EU 805, videojet printers, EU503, clean up operations, etc.) in tons. The calculation frequency shall revert back to a monthly basis once the rolling 365-day total VOC emissions are below 85.0 tons.

- a. In determining total VOC, individual HAP and Total HAP emissions from 300
 Line Post Repair Spray Application (EU 805), owner and operator shall assume
 98 percent of the VOC/HAP containing material used in the 300 Line Post Repair
 Spray Application is destroyed in the RTO.
- H. The owner or operator shall retain Safety Data Sheets (SDS) for VOC/HAP containing materials used in 300 FPEO End Line (including end seal compound liners 15, 16, and 17, mist applicators 15, 16, and 17, conversion presses CP 22 and CP 23, post repair spray application, EU 805, videojet printers, EU503, clean up operations, etc.).
- I. The 300 Line Post Repair Spray Application Cure Ovens are limited to firing only on natural gas. The owner or operator shall maintain records of the types of fuels fired in 300 Line Post Repair Spray Application Cure Ovens.

Plant-wide Monitoring

- J. On a daily basis, the owner or operator shall record the identification and amount of all VOC/HAP containing material used at Silgan Containers Manufacturing (Facility ID: 94-01-040) (including end seal compound liners, mist applicators, conversion presses, post repair spray applications, videojet printers, clean-up operations, etc.) in gallons. The amount of VOC/HAP containing material used shall be determined either by direct measurement or shall be determined by the daily production rates of can ends and tabs. If the amount is determined by production rates, the owner or operator shall maintain records on the amount of can ends and tabs produced daily and the application rates of VOC/HAP containing material per can end and tab.
- K. The owner or operator shall record the VOC content, in pounds per gallon, of all VOC/HAP containing material used at Silgan Containers Manufacturing (Facility ID: 94-01-040).
- L. The owner or operator shall record the single HAP content, in pounds per gallon, of all VOC/HAP containing material used at Silgan Containers Manufacturing (Facility ID: 94-01-040).
- M. The owner or operator shall record the total HAP content, in pounds per gallon, of all VOC/HAP containing material used at Silgan Containers Manufacturing (Facility ID: 94-01-040).

- N. On a monthly basis, the owner or operator shall calculate the total VOC emissions, in tons, from Silgan Containers Manufacturing (Facility ID: 94-01-040) during the previous month. On a monthly basis, the owner or operator shall also calculate the total VOC emissions, in tons, from Silgan Containers Manufacturing (Facility ID: 94-01-040) during the previous12-month period. Records for total VOC emissions shall be kept on monthly basis until the rolling 12-month total VOC emissions exceed 328 tons per year. At this point owner or operator shall immediately begin keeping a 365-day rolling total of the quantity of total VOC emissions emitted from Silgan Containers Manufacturing (Facility ID: 94-01-040) in tons. The calculation frequency shall revert back to a monthly basis once the rolling 365-day total VOC emissions are below 328 tons. Note, the total VOC emission tracking requirements apply to all sources of VOC emissions from Silgan Containers Manufacturing (Facility ID: 94-01-040).
 - a. In determining total VOC, individual HAP, and total HAP emissions from 300 Line Post Repair Spray Application (EU 805), owner and operator shall assume 98 percent of the VOC/HAP containing material used in the 300 Line Post Repair Spray Application is destroyed in the RTO.
 - b. In determining total VOC, individual HAP, and total HAP emissions from 211 Line Post Repair Spray Application (EU 800), owner and operator shall assume 98 percent of the VOC/HAP containing material used in the 211 Line Post Repair Spray Application is destroyed in the RTO.
- O. On a monthly basis, the owner or operator shall calculate the single HAP emissions, in tons, from Silgan Containers Manufacturing (Facility ID: 94-01-040) during the previous month. On a monthly basis, the owner or operator shall also calculate the single HAP emissions, in tons, from Silgan Containers Manufacturing (Facility ID: 94-01-040) during the previous12-month period. Records for single HAP emissions shall be kept on monthly basis until the rolling 12-month single HAP emissions exceed 7.5 tons per year. At this point owner or operator shall immediately begin keeping a 365-day rolling total of the quantity of single HAP emissions emitted from Silgan Containers Manufacturing (Facility ID: 94-01-040) in tons. The calculation frequency shall revert back to a monthly basis once the rolling 365-day single HAP emissions are below 7.5 tons. Note, the single HAP emission tracking requirements apply to all sources of HAP emissions from Silgan Containers Manufacturing (Facility ID: 94-01-040).
 - a. In determining total VOC, individual HAP and total HAP emissions from 300
 Line Post Repair Spray Application (EU 805), owner and operator shall assume
 98 percent of the VOC/HAP containing material used in the 300 Line Post Repair
 Spray Application is destroyed in the RTO.
 - b. In determining total VOC, individual HAP and total HAP emissions from 211 Line Post Repair Spray Application (EU 800), owner and operator shall assume 98 percent of the VOC/HAP containing material used in the 211 Line Post Repair Spray Application is destroyed in the RTO.
- P. On a monthly basis, the owner or operator shall calculate the total HAP emissions, in tons, from Silgan Containers Manufacturing (Facility ID: 94-01-040) during the previous month. On a monthly basis, the owner or operator shall also calculate the total HAP emissions, in tons, from Silgan Containers Manufacturing (Facility ID: 94-01-040) during the previous 12-month period. Records for total HAP emissions shall be kept on monthly

91

basis until the rolling 12-month total HAP emissions exceed 20.0 tons per year. At this point owner or operator shall immediately begin keeping a 365-day rolling total of the quantity of total HAP emissions emitted from Silgan Containers Manufacturing (Facility ID: 94-01-040) in tons. The calculation frequency shall revert back to a monthly basis once the rolling 365-day total HAP emissions are below 20.0 tons. Note, the total HAP emission tracking requirements apply to all sources of HAP emissions from Silgan Containers Manufacturing (Facility ID: 94-01-040).

- a. In determining total VOC, individual HAP and total HAP emissions from 300 Line Post Repair Spray Application (EU 805), owner and operator shall assume 98 percent of the VOC/HAP containing material used in the 300 Line Post Repair Spray Application is destroyed in the RTO.
- b. In determining total VOC, individual HAP and total HAP emissions from 211 Line Post Repair Spray Application (EU 800), owner and operator shall assume 98 percent of the VOC/HAP containing material used in the 211 Line Post Repair Spray Application is destroyed in the RTO.
- Q. The owner or operator shall retain Safety Data Sheets (SDS) for all VOC/HAP containing materials used at Silgan Containers Manufacturing (Facility ID: 94-01-040).

Authority for Requirement: DNR Construction Permit 07-A-1000-S2

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height, (ft, from the ground): 29

Stack Opening, (inches, dia.): 36 Exhaust Flow Rate (scfm): 30,000 Exhaust Temperature (°F): 68

Discharge Style: Vertical Unobstructed

Authority for Requirement: DNR Construction Permit 07-A-1000-S2

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that either the temperature or flowrate above are different than the values stated, the owner or operator shall submit a request to the Department within thirty (30) days of the discovery to determine if a permit amendment is required or submit a permit application requesting to amend the permit.

Mon	itoring	Requir	ement	ts

the owner/operator of this equipment shall comply with the monitoring r below.	equiremenis iisie
Agency Approved Operation & Maintenance Plan Required?	Yes ☐ No ⊠
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes ☐ No ⊠

Authority for Requirement: 567 IAC 22.108(3)

IV. General Conditions

This permit is issued under the authority of the Iowa Code subsection 455B.133(8) and in accordance with 567 Iowa Administrative Code chapter 22.

G1. Duty to Comply

- 1. The permittee must comply with all conditions of the Title V permit. Any permit noncompliance constitutes a violation of the Act and is grounds for enforcement action; for a permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. 567 IAC 22.108(9)"a"
- 2. Any compliance schedule shall be supplemental to, and shall not sanction noncompliance with, the applicable requirements on which it is based. 567 IAC 22.105 (2)"h"(3)
- 3. Where an applicable requirement of the Act is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, both provisions shall be enforceable by the administrator and are incorporated into this permit. 567 IAC 22.108 (1)"b"
- 4. Unless specified as either "state enforceable only" or "local program enforceable only", all terms and conditions in the permit, including provisions to limit a source's potential to emit, are enforceable by the administrator and citizens under the Act. 567 IAC 22.108 (14)
- 5. It shall not be a defense for a permittee, in an enforcement action, that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. 567 IAC 22.108 (9)"b"
- 6. For applicable requirements with which the permittee is in compliance, the permittee shall continue to comply with such requirements. For applicable requirements that will become effective during the permit term, the permittee shall meet such requirements on a timely basis. 567 IAC 22.108(15)"c"

G2. Permit Expiration

- 1. Except as provided in rule 567—22.104(455B), permit expiration terminates a source's right to operate unless a timely and complete application for renewal has been submitted in accordance with rule 567—22.105(455B). 567 IAC 22.116(2)
- 2. To be considered timely, the owner, operator, or designated representative (where applicable) of each source required to obtain a Title V permit shall submit on forms or electronic format specified by the Department to the Air Quality Bureau, Iowa Department of Natural Resources, Air Quality Bureau, Wallace State Office Building, 502 E 9th St., Des Moines, IA 50319-0034, two copies (three if your facility is located in Linn or Polk county) of a complete permit application, at least 6 months but not more than 18 months prior to the date of permit expiration. An additional copy must also be sent to U.S. EPA Region VII, Attention: Chief of Air Permitting & Standards Branch, 11201 Renner Blvd., Lenexa, KS 66219. Additional copies to local programs or EPA are not required for application materials submitted through the electronic format specified by the Department. The application must include all emission points, emission units, air pollution control equipment, and monitoring devices at the facility. All emissions generating activities, including fugitive emissions, must be included. The definition of a complete application is as indicated in 567 IAC 22.105(2). 567 IAC 22.105

G3. Certification Requirement for Title V Related Documents

Any application, report, compliance certification or other document submitted pursuant to this permit shall contain certification by a responsible official of truth, accuracy, and completeness. All certifications shall state that, based on information and belief formed after reasonable

inquiry, the statements and information in the document are true, accurate, and complete. 567 IAC 22.107 (4)

G4. Annual Compliance Certification

By March 31 of each year, the permittee shall submit compliance certifications for the previous calendar year. The certifications shall include descriptions of means to monitor the compliance status of all emissions sources including emissions limitations, standards, and work practices in accordance with applicable requirements. The certification for a source shall include the identification of each term or condition of the permit that is the basis of the certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, currently and over the reporting period consistent with all applicable department rules. For sources determined not to be in compliance at the time of compliance certification, a compliance schedule shall be submitted which provides for periodic progress reports, dates for achieving activities, milestones, and an explanation of why any dates were missed and preventive or corrective measures. The compliance certification shall be submitted to the administrator, director, and the appropriate DNR Field office. 567 IAC 22.108 (15)"e"

G5. Semi-Annual Monitoring Report

By March 31 and September 30 of each year, the permittee shall submit a report of any monitoring required under this permit for the 6 month periods of July 1 to December 31 and January 1 to June 30, respectively. All instances of deviations from permit requirements must be clearly identified in these reports, and the report must be signed by a responsible official, consistent with 567 IAC 22.107(4). The semi-annual monitoring report shall be submitted to the director and the appropriate DNR Field office. 567 IAC 22.108 (5)

G6. Annual Fee

- 1. The permittee is required under subrule 567 IAC 22.106 to pay an annual fee based on the total tons of actual emissions of each regulated air pollutant. Beginning July 1, 1996, Title V operating permit fees will be paid on July 1 of each year. The fee shall be based on emissions for the previous calendar year.
- 2. The fee amount shall be calculated based on the first 4,000 tons of each regulated air pollutant emitted each year. The fee to be charged per ton of pollutant will be available from the department by June 1 of each year. The Responsible Official will be advised of any change in the annual fee per ton of pollutant.
- 3. The emissions inventory shall be submitted annually by March 31 with forms specified by the department documenting actual emissions for the previous calendar year.
- 4. The fee shall be submitted annually by July 1 with forms specified by the department.
- 5. If there are any changes to the emission calculation form, the department shall make revised forms available to the public by January 1. If revised forms are not available by January 1, forms from the previous year may be used and the year of emissions documented changed. The department shall calculate the total statewide Title V emissions for the prior calendar year and make this information available to the public no later than April 30 of each year.
- 6. Phase I acid rain affected units under section 404 of the Act shall not be required to pay a fee for emissions which occur during the years 1993 through 1999 inclusive.
- 7. The fee for a portable emissions unit or stationary source which operates both in Iowa and out of state shall be calculated only for emissions from the source while operating in Iowa.
- 8. Failure to pay the appropriate Title V fee represents cause for revocation of the Title V permit as indicated in 567 IAC 22.115(1)"d".

G7. Inspection of Premises, Records, Equipment, Methods and Discharges

Upon presentation of proper credentials and any other documents as may be required by law, the permittee shall allow the director or the director's authorized representative to:

- 1. Enter upon the permittee's premises where a Title V source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
- 2. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
- 3. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- 4. Sample or monitor, at reasonable times, substances or parameters for the purpose of ensuring compliance with the permit or other applicable requirements. 567 IAC 22.108 (15)"b"

G8. Duty to Provide Information

The permittee shall furnish to the director, within a reasonable time, 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 also shall furnish to the director copies of records required to be kept by the permit, or for information claimed to be confidential, the permittee shall furnish such records directly to the administrator of EPA along with a claim of confidentiality. 567 IAC 22.108 (9)"e"

G9. General Maintenance and Repair Duties

The owner or operator of any air emission source or control equipment shall:

- 1. Maintain and operate the equipment or control equipment at all times in a manner consistent with good practice for minimizing emissions.
- 2. Remedy any cause of excess emissions in an expeditious manner.
- 3. Minimize the amount and duration of any excess emission to the maximum extent possible during periods of such emissions. These measures may include but not be limited to the use of clean fuels, production cutbacks, or the use of alternate process units or, in the case of utilities, purchase of electrical power until repairs are completed.
- 4. Schedule, at a minimum, routine maintenance of equipment or control equipment during periods of process shutdowns to the maximum extent possible. 567 IAC 24.2(1)

G10. Recordkeeping Requirements for Compliance Monitoring

- 1. In addition to any source specific recordkeeping requirements contained in this permit, the permittee shall maintain the following compliance monitoring records, where applicable:
 - a. The date, place and time of sampling or measurements
 - b. The date the analyses were performed.
 - c. The company or entity that performed the analyses.
 - d. The analytical techniques or methods used.
 - e. The results of such analyses; and
 - f. The operating conditions as existing at the time of sampling or measurement.
 - g. The records of quality assurance for continuous compliance monitoring systems (including but not limited to quality control activities, audits and calibration drifts.)
- 2. The permittee shall retain records of all required compliance monitoring data and support information for a period of at least 5 years from the date of compliance monitoring sample, measurement report or application. Support information includes all calibration and maintenance records and all original strip chart recordings for continuous compliance monitoring, and copies of all reports required by the permit.

- 3. For any source which in its application identified reasonably anticipated alternative operating scenarios, the permittee shall:
 - a. Comply with all terms and conditions of this permit specific to each alternative scenario.
 - b. Maintain a log at the permitted facility of the scenario under which it is operating.
 - c. Consider the permit shield, if provided in this permit, to extend to all terms and conditions under each operating scenario. 567 IAC 22.108(4), 567 IAC 22.108(12)

G11. Evidence used in establishing that a violation has or is occurring.

Notwithstanding any other provisions of these rules, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any provisions herein.

1. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred at a source:

- a. A monitoring method approved for the source and incorporated in an operating permit pursuant to 567 Chapter 22;
- b. Compliance test methods specified in 567 Chapter 25; or
- c. Testing or monitoring methods approved for the source in a construction permit issued pursuant to 567 Chapter 22.
- 2. The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
 - a. Any monitoring or testing methods provided in these rules; or
 - b. Other testing, monitoring, or information gathering methods that produce information comparable to that produced by any method in subrule 21.5(1) or this subrule. 567 IAC 21.5(1)-567 IAC 21.5(2)

G12. Prevention of Accidental Release: Risk Management Plan Notification and Compliance Certification

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Act, the permittee shall notify the department of this requirement. The plan shall be filed with all appropriate authorities by the deadline specified by EPA. A certification that this risk management plan is being properly implemented shall be included in the annual compliance certification of this permit. 567 IAC 22.108(6)

G13. Hazardous Release

The permittee must report any situation involving the actual, imminent, or probable release of a hazardous substance into the atmosphere which, because of the quantity, strength and toxicity of the substance, creates an immediate or potential danger to the public health, safety or to the environment. A verbal report shall be made to the department at (515) 725-8694 and to the local police department or the office of the sheriff of the affected county as soon as possible but not later than six hours after the discovery or onset of the condition. This verbal report must be followed up with a written report as indicated in 567 IAC 131.2(2). 567 IAC Chapter 131-State Only

G14. Excess Emissions and Excess Emissions Reporting Requirements

1. Excess Emissions. Excess emission during a period of startup, shutdown, or cleaning of control equipment is not a violation of the emission standard if the startup, shutdown or cleaning is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions. Cleaning of control equipment which does not require the shutdown of the process equipment shall be limited to one six-minute period per one-hour period. An incident of excess emission (other than an incident during startup, shutdown or cleaning of control equipment) is a

violation. If the owner or operator of a source maintains that the incident of excess emission was due to a malfunction, the owner or operator must show that the conditions which caused the incident of excess emission were not preventable by reasonable maintenance and control measures. Determination of any subsequent enforcement action will be made following review of this report. If excess emissions are occurring, either the control equipment causing the excess emission shall be repaired in an expeditious manner or the process generating the emissions shall be shutdown within a reasonable period of time. An expeditious manner is the time necessary to determine the cause of the excess emissions and to correct it within a reasonable period of time. A reasonable period of time is eight hours plus the period of time required to shut down the process without damaging the process equipment or control equipment. A variance from this subrule may be available as provided for in Iowa Code section 455B.143. In the case of an electric utility, a reasonable period of time is eight hours plus the period of time until comparable generating capacity is available to meet consumer demand with the affected unit out of service, unless, the director shall, upon investigation, reasonably determine that continued operation constitutes an unjustifiable environmental hazard and issue an order that such operation is not in the public interest and require a process shutdown to commence immediately.

2. Excess Emissions Reporting

- a. Initial Reporting of Excess Emissions. An incident of excess emission (other than an incident of excess emission during a period of startup, shutdown, or cleaning) shall be reported to the appropriate field office of the department within eight hours of, or at the start of the first working day following the onset of the incident. The reporting exemption for an incident of excess emission during startup, shutdown or cleaning does not relieve the owner or operator of a source with continuous monitoring equipment of the obligation of submitting reports required in 567-subrule 25.1(6). An initial report of excess emission is not required for a source with operational continuous monitoring equipment (as specified in 567-subrule 25.1(1)) if the incident of excess emission continues for less than 30 minutes and does not exceed the applicable emission standard by more than 10 percent or the applicable visible emission standard by more than 10 percent opacity. The initial report may be made by electronic mail (E-mail), in person, or by telephone and shall include as a minimum the following:
 - i. The identity of the equipment or source operation from which the excess emission originated and the associated stack or emission point.
 - ii. The estimated quantity of the excess emission.
 - iii. The time and expected duration of the excess emission.
 - iv. The cause of the excess emission.
 - v. The steps being taken to remedy the excess emission.
 - vi. The steps being taken to limit the excess emission in the interim period.
- b. Written Reporting of Excess Emissions. A written report of an incident of excess emission shall be submitted as a follow-up to all required initial reports to the department within seven days of the onset of the upset condition, and shall include as a minimum the following:
 - i. The identity of the equipment or source operation point from which the excess emission originated and the associated stack or emission point.
 - ii. The estimated quantity of the excess emission.
 - iii. The time and duration of the excess emission.
 - iv. The cause of the excess emission.

- v. The steps that were taken to remedy and to prevent the recurrence of the incident of excess emission.
- vi. The steps that were taken to limit the excess emission.
- vii. If the owner claims that the excess emission was due to malfunction, documentation to support this claim. 567 IAC 24.1(1)-567 IAC 24.1(4)
- 3. Emergency Defense for Excess Emissions. For the purposes of this permit, an "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include non-compliance, to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation or operator error. An emergency constitutes an affirmative defense to an action brought for non-compliance with technology based limitations if it can be demonstrated through properly signed contemporaneous operating logs or other relevant evidence that:
 - a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;
 - b. The facility at the time was being properly operated;
 - c. During the period of the emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements of the permit; and
 - d. The permittee submitted notice of the emergency to the director by certified mail within two working days of the time when the emissions limitations were exceeded due to the emergency. This notice fulfills the requirement of paragraph 22.108(5)"b." See G15. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof. This provision is in addition to any emergency or upset provision contained in any applicable requirement. 567 IAC 22.108(16)

G15. Permit Deviation Reporting Requirements

A deviation is any failure to meet a term, condition or applicable requirement in the permit. Reporting requirements for deviations that result in a hazardous release or excess emissions have been indicated above (see G13 and G14). Unless more frequent deviation reporting is specified in the permit, any other deviation shall be documented in the semi-annual monitoring report and the annual compliance certification (see G4 and G5). 567 IAC 22.108(5)"b"

G16. Notification Requirements for Sources That Become Subject to NSPS and NESHAP Regulations

During the term of this permit, the permittee must notify the department of any source that becomes subject to a standard or other requirement under 567-subrule 23.1(2) (standards of performance of new stationary sources) or section 111 of the Act; or 567-subrule 23.1(3) (emissions standards for hazardous air pollutants), 567-subrule 23.1(4) (emission standards for hazardous air pollutants for source categories) or section 112 of the Act. This notification shall be submitted in writing to the department pursuant to the notification requirements in 40 CFR Section 60.7, 40 CFR Section 61.07, and/or 40 CFR Section 63.9. 567 IAC 23.1(2), 567 IAC 23.1(4)

G17. Requirements for Making Changes to Emission Sources That Do Not Require Title V Permit Modification

- 1. Off Permit Changes to a Source. Pursuant to section 502(b)(10) of the CAAA, the permittee may make changes to this installation/facility without revising this permit if:
 - a. The changes are not major modifications under any provision of any program required by section 110 of the Act, modifications under section 111 of the act, modifications under section 112 of the act, or major modifications as defined in 567 IAC Chapter 22.
 - b. The changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or in terms of total emissions);
 - c. The changes are not modifications under any provisions of Title I of the Act and the changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or as total emissions);
 - d. The changes are not subject to any requirement under Title IV of the Act (revisions affecting Title IV permitting are addressed in rules 567—22.140(455B) through 567 22.144(455B));
 - e. The changes comply with all applicable requirements.
 - f. For each such change, the permitted source provides to the department and the administrator by certified mail, at least 30 days in advance of the proposed change, a written notification, including the following, which must be attached to the permit by the source, the department and the administrator:
 - i. A brief description of the change within the permitted facility,
 - ii. The date on which the change will occur,
 - iii. Any change in emission as a result of that change,
 - iv. The pollutants emitted subject to the emissions trade
 - v. If the emissions trading provisions of the state implementation plan are invoked, then Title V permit requirements with which the source shall comply; a description of how the emissions increases and decreases will comply with the terms and conditions of the Title V permit.
 - vi. A description of the trading of emissions increases and decreases for the purpose of complying with a federally enforceable emissions cap as specified in and in compliance with the Title V permit; and
 - vii. Any permit term or condition no longer applicable as a result of the change. 567 IAC 22.110(1)
- 2. Such changes do not include changes that would violate applicable requirements or contravene federally enforceable permit terms and conditions that are monitoring (including test methods), record keeping, reporting, or compliance certification requirements. 567 IAC 22.110(2)
- 3. Notwithstanding any other part of this rule, the director may, upon review of a notice, require a stationary source to apply for a Title V permit if the change does not meet the requirements of subrule 22.110(1). 567 IAC 22.110(3)
- 4. The permit shield provided in subrule 22.108(18) shall not apply to any change made pursuant to this rule. Compliance with the permit requirements that the source will meet using the emissions trade shall be determined according to requirements of the state implementation plan authorizing the emissions trade. 567 IAC 22.110(4)

5. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes, for changes that are provided for in this permit. 567 IAC 22.108(11)

G18. Duty to Modify a Title V Permit

- 1. Administrative Amendment.
 - a. An administrative permit amendment is a permit revision that does any of the following:
 - i. Correct typographical errors
 - ii. Identify a change in the name, address, or telephone number of any person identified in the permit, or provides a similar minor administrative change at the source:
 - iii. Require more frequent monitoring or reporting by the permittee; or iv. Allow for a change in ownership or operational control of a source where the director determines that no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new permittee has been submitted to the director.
 - b. The permittee may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request. The request shall be submitted to the director.
 - c. Administrative amendments to portions of permits containing provisions pursuant to Title IV of the Act shall be governed by regulations promulgated by the administrator under Title IV of the Act.
- 2. Minor Title V Permit Modification.
 - a. Minor Title V permit modification procedures may be used only for those permit modifications that satisfy all of the following:
 - i. Do not violate any applicable requirement;
 - ii. Do not involve significant changes to existing monitoring, reporting or recordkeeping requirements in the Title V permit;
 - iii. Do not require or change a case by case determination of an emission limitation or other standard, or an increment analysis;
 - iv. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed in order to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include any federally enforceable emissions caps which the source would assume to avoid classification as a modification under any provision under Title I of the Act; and an alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Act;
 - v. Are not modifications under any provision of Title I of the Act; and vi. Are not required to be processed as significant modification under rule 567 22.113(455B).
 - b. An application for minor permit revision shall be on the minor Title V modification application form and shall include at least the following:
 - i. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;

- ii. The permittee's suggested draft permit;
- iii. Certification by a responsible official, pursuant to 567 IAC 22.107(4), that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used; and
- iv. Completed forms to enable the department to notify the administrator and the affected states as required by 567 IAC 22.107(7).
- c. The permittee may make the change proposed in its minor permit modification application immediately after it files the application. After the permittee makes this change and until the director takes any of the actions specified in 567 IAC 22.112(4) "a" to "c", the permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this time, the permittee need not comply with the existing permit terms and conditions it seeks to modify. However, if the permittee fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against the facility.

3. Significant Title V Permit Modification.

Significant Title V modification procedures shall be used for applications requesting Title V permit modifications that do not qualify as minor Title V modifications or as administrative amendments. These include but are not limited to all significant changes in monitoring permit terms, every relaxation of reporting or recordkeeping permit terms, and any change in the method of measuring compliance with existing requirements. Significant Title V modifications shall meet all requirements of 567 IAC Chapter 22, including those for applications, public participation, review by affected states, and review by the administrator, as those requirements that apply to Title V issuance and renewal.

The permittee shall submit an application for a significant permit modification not later than three months after commencing operation of the changed source unless the existing Title V permit would prohibit such construction or change in operation, in which event the operation of the changed source may not commence until the department revises the permit. 567 IAC 22.111-567 IAC 22.113

G19. Duty to Obtain Construction Permits

Unless exempted in 567 IAC 22.1(2) or to meet the parameters established in 567 IAC 22.1(1)"c", the permittee shall not construct, install, reconstruct or alter any equipment, control equipment or anaerobic lagoon without first obtaining a construction permit, or conditional permit, or permit pursuant to rule 567 IAC 22.8, or permits required pursuant to rules 567 IAC 22.4, 567 IAC 22.5, 567 IAC 31.3, and 567 IAC 33.3 as required in 567 IAC 22.1(1). A permit shall be obtained prior to the initiation of construction, installation or alteration of any portion of the stationary source or anaerobic lagoon. 567 IAC 22.1(1)

G20. Asbestos

The permittee shall comply with 567 IAC 23.1(3)"a", and 567 IAC 23.2(3)"g" when activities involve asbestos mills, surfacing of roadways, manufacturing operations, fabricating, insulating, waste disposal, spraying applications, demolition and renovation operations (567 IAC 23.1(3)"a"); training fires and controlled burning of a demolished building (567 IAC 23.2).

G21. Open Burning

The permittee is prohibited from conducting open burning, except as provided in 567 IAC 23.2. 567 IAC 23.2 except 23.2(3)"j"; 567 IAC 23.2(3)"j" - State Only

G22. Acid Rain (Title IV) Emissions Allowances

The permittee shall not exceed any allowances that it holds under Title IV of the Act or the regulations promulgated there under. Annual emissions of sulfur dioxide in excess of the number of allowances to emit sulfur dioxide held by the owners and operators of the unit or the designated representative of the owners and operators is prohibited. Exceedences of applicable emission rates are prohibited. "Held" in this context refers to both those allowances assigned to the owners and operators by USEPA, and those allowances supplementally acquired by the owners and operators. The use of any allowance prior to the year for which it was allocated is prohibited. Contravention of any other provision of the permit is prohibited. 567 IAC 22.108(7)

G23. Stratospheric Ozone and Climate Protection (Title VI) Requirements

- 1. The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
 - a. All containers in which a class I or class II substance is 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 into 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 statement 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.
- 2. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for MVACs in Subpart B:
 - 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 reporting and recordkeeping 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 the 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.
- 3. If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
- 4. 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 system used on passenger buses using HCFC-22 refrigerant,

5. The permittee shall be allowed to switch from any ozone-depleting or greenhouse gas generating substances to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. 40 CFR part 82

G24. Permit Reopenings

- 1. This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. 567 IAC 22.108(9)"c"
- 2. Additional applicable requirements under the Act become applicable to a major part 70 source with a remaining permit term of 3 or more years. Revisions shall be made as expeditiously as practicable, but not later than 18 months after the promulgation of such standards and regulations.
 - a. Reopening and revision on this ground is <u>not</u> required if the permit has a remaining term of less than three years;
 - b. Reopening and revision on this ground is <u>not</u> required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions have been extended pursuant to 40 CFR 70.4(b)(10)(i) or (ii) as amended to May 15, 2001.
 - c. Reopening and revision on this ground is <u>not</u> required if the additional applicable requirements are implemented in a general permit that is applicable to the source and the source receives approval for coverage under that general permit. 567 IAC 22.108(17)"a", 567 IAC 22.108(17)"b"
- 3. A permit shall be reopened and revised under any of the following circumstances:
 - a. The department receives notice that the administrator has granted a petition for disapproval of a permit pursuant to 40 CFR 70.8(d) as amended to July 21, 1992, provided that the reopening may be stayed pending judicial review of that determination; b. The department or the administrator determines that the Title V permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the Title V permit;
 - c. Additional applicable requirements under the Act become applicable to a Title V source, provided that the reopening on this ground is not required if the permit has a remaining term of less than three years, the effective date of the requirement is later than the date on which the permit is due to expire, or the additional applicable requirements are implemented in a general permit that is applicable to the source and the source receives approval for coverage under that general permit. Such a reopening shall be complete not later than 18 months after promulgation of the applicable requirement.
 - d. Additional requirements, including excess emissions requirements, become applicable to a Title IV affected source under the acid rain program. Upon approval by the administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.
 - e. The department or the administrator determines that the permit must be revised or

revoked to ensure compliance by the source with the applicable requirements. 567 IAC 22.114(1)

- 4. Proceedings to reopen and reissue a Title V permit shall follow the procedures applicable to initial permit issuance and shall effect only those parts of the permit for which cause to reopen exists. 567 IAC 22.114(2)
- 5. A notice of intent shall be provided to the Title V source at least 30 days in advance of the date the permit is to be reopened, except that the director may provide a shorter time period in the case of an emergency. 567 IAC 22.114(3)

G25. Permit Shield

- 1. The director may expressly include in a Title V permit a provision stating that compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that:
 - a. Such applicable requirements are included and are specifically identified in the permit; or
 - b. The director, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the permit includes the determination or a concise summary thereof.
- 2. A Title V permit that does not expressly state that a permit shield exists shall be presumed not to provide such a shield.
- 3. A permit shield shall not alter or affect the following:
 - a. The provisions of Section 303 of the Act (emergency orders), including the authority of the administrator under that section;
 - b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
 - c. The applicable requirements of the acid rain program, consistent with Section 408(a) of the Act;
 - d. The ability of the department or the administrator to obtain information from the facility pursuant to Section 114 of the Act. 567 IAC 22.108 (18)

G26. Severability

The provisions of this permit are severable and if any provision or application of any provision is found to be invalid by this department or a court of law, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected by such finding. 567 IAC 22.108 (8)

G27. Property Rights

The permit does not convey any property rights of any sort, or any exclusive privilege. 567 IAC 22.108 (9)"d"

G28. Transferability

This permit is not transferable from one source to another. If title to the facility or any part of it is transferred, an administrative amendment to the permit must be sought consistent with the requirements of 567 IAC 22.111(1). 567 IAC 22.111 (1)"d"

G29. Disclaimer

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. 567 IAC 22.3(3)"c"

G30. Notification and Reporting Requirements for Stack Tests or Monitor Certification

The permittee shall notify the department's stack test contact in writing not less than 30 days before a required test or performance evaluation of a continuous emission monitor is performed to determine compliance with applicable requirements of 567 – Chapter 23 or a permit condition. Such notice shall include the time, the place, the name of the person who will conduct the test and other information as required by the department. If the owner or operator does not provide timely notice to the department, the department shall not consider the test results or performance evaluation results to be a valid demonstration of compliance with applicable rules or permit conditions. Upon written request, the department may allow a notification period of less than 30 days. At the department's request, a pretest meeting shall be held not later than 15 days prior to conducting the compliance demonstration. A testing protocol shall be submitted to the department no later than 15 days before the owner or operator conducts the compliance demonstration. A representative of the department shall be permitted to witness the tests. Results of the tests shall be submitted in writing to the department's stack test contact in the form of a comprehensive report within six weeks of the completion of the testing. Compliance tests conducted pursuant to this permit shall be conducted with the source operating in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which the source shall be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the equipment manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the department that the source has been physically altered so that capacity cannot be exceeded, or the department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the department to determine whether such source is in compliance.

Stack test notifications, reports and correspondence shall be sent to:

Stack Test Review Coordinator Iowa DNR, Air Quality Bureau Wallace State Office Building 502 E 9th St. Des Moines, IA 50319-0034 (515) 725-9545

Within Polk and Linn Counties, stack test notifications, reports and correspondence shall also be directed to the supervisor of the respective county air pollution program. 567 IAC 25.1(7)"a", 567 IAC 25.1(9)

G31. Prevention of Air Pollution Emergency Episodes

The permittee shall comply with the provisions of 567 IAC Chapter 26 in the prevention of excessive build-up of air contaminants during air pollution episodes, thereby preventing the occurrence of an emergency due to the effects of these contaminants on the health of persons. 567 IAC 26.1(1)

G32. Contacts List

The current address and phone number for reports and notifications to the EPA administrator is:

Iowa Compliance Officer

Air Branch

Enforcement and Compliance Assurance Division

U.S. EPA Region 7

11201 Renner Blvd.

Lenexa, KS 66219

(913) 551-7020

The current address and phone number for reports and notifications to the department or the Director is:

Chief, Air Quality Bureau

Iowa Department of Natural Resources

Wallace State Office Building

502 E 9th St.

Des Moines, IA 50319-0034

(515) 725-8200

Reports or notifications to the DNR Field Offices or local programs shall be directed to the supervisor at the appropriate field office or local program. Current addresses and phone numbers are:

Field Office 1

1101 Commercial Court, Suite 10 Manchester, IA 52057 (563) 927-2640

Field Office 3

1900 N. Grand Ave. Spencer, IA 51301 (712) 262-4177

Field Office 5

Wallace State Office Building 502 E 9th St. Des Moines, IA 50319-0034 (515) 725-0268

Polk County Public Works Dept.

Air Quality Division 5885 NE 14th St. Des Moines, IA 50313 (515) 286-3351

Field Office 2

2300-15th St., SW Mason City, IA 50401 (641) 424-4073

Field Office 4

1401 Sunnyside Lane Atlantic, IA 50022 (712) 243-1934

Field Office 6

1023 West Madison Street Washington, IA 52353-1623 (319) 653-2135

Linn County Public Health

Air Quality Branch 1020 6th Street SE Cedar Rapids, IA 52401 (319) 892-6000