

AIR PERMIT REVIEW

APPLICANT Silgan Can Company	SITE LOCATION Maxton	COUNTY Robeson
CONTACT Lisa Strbik Michael Penland	PHONE (262) 569-5848 (910) 844-4141	
APPLICATION FOR Title V Renewal	Existing P/N 08693T02	
APP No. 7800203.03A	REVIEWER F. Langenbach	SIGNATURE DATE
RECOMMENDATION and COMMENT Issue Permit # 08693T03	FEE CLASS Title V	

1. Purpose of Application

This revision is a renewal of an existing Title V permit pursuant to 2Q .0513. The existing Title V permit (08693T02) was issued on September 6, 2001 and is currently scheduled to expire on December 31, 2003. The renewal application was received on March 27, 2003 or at least nine months prior to the expiration date. Therefore, the existing permit shall not expire until the renewal permit has been issued or denied. All terms and conditions of the existing permit shall remain in effect until the renewal permit has been issued or denied.

2. Facility Description

This facility manufactures metal cans for food.

3. Application Chronology

March 27, 2003 - Air permit application was received by the Division of Air Quality (DAQ), Raleigh Central Office (RCO). Permit application was considered complete as of March 27, 2003.

May 9, 2003 - Requested in e-mail to Tom McKinney, FRO, to provide any regional comments for this permit renewal.

May 21, 2003 - Received comments on the Title V renewal application from Tom McKinney, FRO.

May 23, 2003 - A request for additional information was sent to Lisa Strbik, Silgan Can Company, regarding the requirement for a CAM plan for thermal oxidizers (ID Nos. CD-001 and CD-011) under 40 CFR Part 64.4.

June 19, 2003 - A 1994 test report was submitted in response to the May 23, 2003 request.

September 1, 2003 - Draft review comments submitted by Silgan Can. See Section 13 for summary.

4. Permit Modification/Changes

a. The renewal application requested the following corrections to the permit.

No requested changes were noted in the initial application.

b. The following table represents the renewal changes to the currently drafted Title V permit:

permit page #	condition #	description of change
page 3	Section 1, ES-001	removed roll coater hood from ES-001 description
page 3	Section 1, ES-002	changed to show ES-002 an uncontrolled source
page 3	Section 1, ES-016	changed to show ES-016 a controlled source
page 3	Section 1, ES-018	revised source description for ES-018
page 3	Section 1, ES-019	removed Blodgett Oven from list of permitted sources
page 3	Section 1	removed footnote from table and * referencing sources ES-003, 004, 005, 006, and 007.
page 4	2.1(A)	revised source description
page 4	2.1(A)(1)(b)	updated first sentence of testing condition
page 5	2.1(A)(2)(a)	specifically listed sources subject to 2D .0516
page 5	2.1(A)(3)(c)	updated monitoring language for 2D .0521
page 5	2.1(A)(3)(d)	added statement of noncompliance for recordkeeping condition
page 6	2.1(B)	revised source description
page 7	2.1(B)(2)(c)	updated monitoring language for 2D .0521
page 7	2.2(A)	revised source description
page 8	2.2(A) - table	added to table regulations 2D .0530, .0958, and .1100
page 8	2.2(A)(1)(d)	deleted old and added new testing condition
page 9	2.2(A)(1)(f,g,h)	revised monitoring and recordkeeping language for 2D .0530 avoidance
page 10	2.2(A)(3)	added regulatory language for 2D .0958
page 11	Section 3	updated General Conditions
	Part II with General Conditions	these sections removed from renewal permit
all		per Silgan request replaced "finishes" with "coatings"

Silgan Can Company
August 12, 2003

5. Regulatory Review

- a. The facility is subject to the following regulations:
- C 2D .0515 "Particulates from Miscellaneous Industrial Processes"
 - C 2D .0516 "Sulfur Dioxide Emissions from Combustion Sources"
 - C 2D .0521 "Control Of Visible Emissions"
 - C 2D .0530 "Prevention of Significant Deterioration" [avoidance]
 - C 2D .0918 "Can Coating"
 - C 2D .0958 "Work Practices for Sources of Volatile Organic Compounds" *
 - C 2D .1100 "Control of Toxic Air Pollutants"

* The current permit does not include this rule. This rule applies to all facilities that use volatile organic compounds as solvents, carriers, material processing media, or industrial chemical reactants. The only exemptions to this rule are architectural or maintenance coatings or sources subject to 40 CFR Part 63, Subpart JJ [WOOD FURNITURE MANUFACTURING OPERATIONS]. Can manufacturing coating is subject to this rule.

6. NSPS, NESHAPS, PSD, Attainment Status, 112(r), CAM

NSPS

New Source Performance Standards (NSPS) do not apply to this facility.

NESHAP/MACT

Based on a review of the facility's current operations and emission sources, the facility is not subject to any promulgated MACT standards [40 CFR Part 63]. However, the facility may be subject to the proposed "Metal Can" [Subpart KKKK] MACT.

PSD

This facility is a minor Prevention of Significant Deterioration (PSD) source with an avoidance condition limiting volatile organic compound emissions to less than 250 tons per 12 month period.

Attainment Status

This facility is located in Robeson County which is in attainment.

112(r)

Per the FRO, this facility is not subject to 112(r).

CAM

On May 23, 2003, a request for additional information was sent to Lisa Strbik, Silgan Can Company, requesting a CAM plan as defined under 40 CFR 64.4 for thermal oxidizers (ID Nos. CD-001 and CD-011) which control a portion of the volatile organic compound emissions from the can manufacturing process. These VOC emissions are limited to less than 250 tons per 12 month period taken as an avoidance limitation for PSD.

Silgan's response was received on June 19, 2003 and consisted of a source test report conducted in 1994 on thermal oxidizer CD-001 with a tested destruction efficiency of 97.9 percent while operating at 1400 degrees F. and projected capture efficiencies for the washcoat oven outlet [ES-017] and spray area exhaust and inside bake oven [ES-018]. No testing was conducted for thermal oxidizer CD-011 and no projected capture efficiencies are available for ES-001, ES-002, and ES-019.

The existing permitted performance monitoring approach for the thermal oxidizers meets the definition of continuous compliance determination method as provided in CFR Part 64.1, which:

1. Is used to determine compliance with an emission limitation or standard on a continuous basis, consistent with the averaging period established for the emission limitation or standard; and
2. Provides data either in units of the standard or correlated directly with the compliance limit.

However, the DAQ will require current test data on both thermal oxidizers for both before and after control VOC emissions while tracking combustion temperature to establish a destruction efficiency. In addition, during testing, for source ES-001 controlled by CD-001 and ES-16, ES-017, and ES-018 controlled by CD-011, establish a capture efficiency for each utilizing the Test Methods under 204 as defined in 40 CFR Part 51, Appendix M. Utilizing these newly developed continuous compliance parameters for the thermal oxidizers [minimum combustion temperature, and destruction efficiency] and capture efficiency for the controlled emission sources will allow the permitted Title V continuous compliance determination method to be exempted from CAM under CFR 64.2(b)(vi).

7. Facility Wide Air Toxics

Silgan Can has a facility-wide toxic emission limitation for formaldehyde of 0.035 pounds per hour. After promulgation of the last applicable MACT standard, [40 CFR Part 63, Subpart KKKK] the facility will be subject to a facility-wide toxic demonstration under 2Q .0705.

8. Facility Compliance Status

Based on a site inspection conducted on September 23, 2002 by Tom McKinney of the FRO, the facility was found to be in compliance with all applicable requirements.

9. Statement of Compliance

The DAQ has reviewed the compliance status of this facility. The applicant has certified that the facility will be in compliance with all applicable requirements at the time of permit issuance and will continue to comply with these requirements. The applicant has also certified that the facility will be in compliance with any applicable requirements taking effect during the term of the permit and will meet such requirements on a timely basis.

10. Facility Emissions Review

There is no change in emissions for this renewal.

11. Stipulation Review

All stipulations are standard for this type of facility.

Silgan Can Company
August 12, 2003

12. Public Notice / EPA and Affected State Review

Pursuant to 2Q.0521, a notice of the draft Title V Permit shall be placed in a newspaper of general circulation in the area where the facility is located. The notice will provide for a 30 day comment period, with an opportunity for a public hearing. Copies of the public notice shall be sent to persons on the Title V mailing list and EPA. Pursuant to 2Q.0522, a copy of each permit application, each proposed permit and each final permit pursuant shall be provided to EPA. Also pursuant to 2Q.0522, a notice of the draft Title V Permit shall be provided to each affected State or local program. For this facility, South Carolina is an affected state.

13. Conclusions, Comments, and Recommendations

The review and draft permit were sent to the FRO on August 12, 2003 with an indication of no Regional comments received on August 21, 2003.

The review and draft permit were sent to Lisa Strbik, Silgan Can on August 21, 2003 with comments received on September 1, 2003. The comments are summarized as follows and changes made as noted:

- C The roll coater hood should be removed as a descriptor for ES-01.
- C Emission source ES-02 is no longer being controlled by thermal oxidizer CD-01.
- C Emission source ES-16 should be included in the list of controlled sources by thermal oxidizer CD-011.
- C Emission source ES-019, Blodgett Oven has been decommissioned.
- C Silgan Can requested the use of the word "coatings" rather than "finishes".
- C Silgan Can requested clarification on the 2D.0918 emission limits for their controlled sources. The DAQ response is that Silgan must use compliant coatings but the continuous use of the thermal oxidizers is not required under this rule but may be run only when needed to meet the PSD avoidance limit.
- C Silgan Can requested 12 months to complete the required testing for the thermal oxidizers and capture efficiency determinations for the controlled sources. DAQ Believes 6 months is reasonable to complete the testing and submit results.
- C Silgan Can also had questions on the format for PSD avoidance reporting and recordkeeping for toxics.

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