

From: [Sorvillo, Tracie](#)
To: [Antipova, Daria](#)
Subject: RE: IDEM OAQ Contact Information for Application No. 127-47698-00030 for Ardagh Metal Packaging
Date: Thursday, April 11, 2024 4:32:36 PM
Attachments: [image001.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)
[image009.png](#)

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Hi Daria,

Just an update – received this email and am working on completing.

Thank you,
Tracie Sorvillo

From: Antipova, Daria <DAntipov@idem.IN.gov>
Sent: Tuesday, April 9, 2024 3:21 PM
To: Sorvillo, Tracie <Tracie.Sorvillo@ardaghgroup.com>
Subject: RE: IDEM OAQ Contact Information for Application No. 127-47698-00030 for Ardagh Metal Packaging

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Tracie,

Thank you for a quick reply.

Also, can you please fill out template for fugitive calculations (paved or/and unpaved roads at the source). These are not counted toward the source-wide PTE, however, fugitive calcs must be present for the state rule evaluation.

Thank you,

Sincerely,



Daria Antipova,
IDEM, OAQ
Permits Branch
(317) 234-3429



Please consider the environment before printing this email.

From: Sorvillo, Tracie <Tracie.Sorvillo@ardaghgroup.com>
Sent: Tuesday, April 9, 2024 8:56 AM
To: Antipova, Daria <DAntipov@idem.IN.gov>
Subject: RE: IDEM OAQ Contact Information for Application No. 127-47698-00030 for Ardagh Metal Packaging

****** This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. ******

Good morning, Daria – Confirmed. Yes, this was placed at the Valparaiso Public Library on Wednesday 4/3 around 3pm

From: Antipova, Daria <DAntipov@idem.IN.gov>
Sent: Tuesday, April 9, 2024 8:19 AM
To: Sorvillo, Tracie <Tracie.Sorvillo@ardaghgroup.com>
Subject: FW: IDEM OAQ Contact Information for Application No. 127-47698-00030 for Ardagh Metal Packaging
Importance: High

You don't often get email from dantipov@idem.in.gov. [Learn why this is important](#)

Information Security Warning: This email comes from an external source. Please be careful when clicking on the links and attachments. You can report suspicious emails via the Report Message Add-in.

Good morning, Tracie,

Can you please clarify if the copy of the renewal application for Ardagh Metal has been placed to the local library?

Based on my preliminary review of the application, the permit approval that is required for this application will be subject to the public notice requirements of 326 IAC 2-1.1-6. As the permit applicant, you are required to place a copy of the permit application packet for public review at a public library in the county where the source is located (preferably at the local public library nearest to the source in the county where the source is located) within ten (10) days of the submission of the application. In the GSD-01 Form, Part H, the date that the application packet was filed with the local library was not provided. Please provide the date that the application packet was filed with the local library and confirm whether (or not) a copy of the application packet was placed at the local library.

Sincerely,

Daria Antipova,
IDEM, OAQ



Permits Branch
(317) 234-3429



Please consider the environment before printing this email.

From: Antipova, Daria

Sent: Wednesday, April 3, 2024 11:43 AM

To: Grayson, Michael <michael.grayson@ardaghgroup.com>

Subject: IDEM OAQ Contact Information for Application No. 127-47698-00030 for Ardagh Metal Packaging

Importance: High

Dear Michael Grayson,

I am the permit writer assigned to the current application No. 127-47698-00030 for Ardagh Metal Packaging. I would like to extend to you my contact information so that we may have continued communication until your new permit is issued. Please keep this information at hand. It is common for questions to arise, and oftentimes, further clarification is needed during the permit review process.

To expedite the review process, please e-mail me the electronic copy of your calculations (preferably in excel format) and other supporting documents used as part of your application.

IDEM, OAQ will notify you when a draft permit has been submitted for public notice and/or when a final permit has been issued. As part of the notification, IDEM, OAQ will provide information on how to access the draft and/or final permit electronically on IDEM's website. If Ardagh Metal Packaging would prefer to receive paper copies of the entire draft and/or final permit, please let me know prior to the end of the applicant review period. If you prefer to receive paper copies of the entire permit, IDEM, OAQ will mail a paper copy of the draft permit and/or original signed final permit to the source contact. If you do not request to receive paper copies of the entire permit, IDEM, OAQ will only mail a paper copy of the original signed final permit signature page to the source contact.

Based on my preliminary review of the application, the permit approval that is required for this application will be subject to the public notice requirements of 326 IAC 2-1.1-6. As the permit applicant, you are required to place a copy of the permit application packet for public review at a public library in the county where the source is located (preferably at the local public library nearest to the source in the county where the source is located) within ten (10) days of the submission of the application. In the GSD-01 Form, Part H, the date that the application packet was filed with the local library was not provided. Please provide the date that the application packet was filed with the local library and confirm whether (or not) a copy of the

application packet was placed at the local library.

Please feel free to contact me at any time if you have questions, concerns, or important information regarding your permit. For your convenience, my section chief (Josiah Balogun) may be contacted at 317-234-1203 or jbalogun@idem.IN.gov.

Thank you in advance for your time and assistance. I look forward to working with you.

Sincerely,



Daria Antipova, Environmental Engineer

Permits Branch • Office of Air Quality

(317) 234-3429 • DAntipov@idem.IN.gov

[Indiana Department of Environmental Management](http://www.in.gov/indiana)



INDIANA

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We appreciate your input!



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From: [Sorvillo, Tracie](#)
To: [Antipova, Daria](#)
Subject: RE: IDEM OAQ Contact Information for Application No. 127-47698-00030 for Ardagh Metal Packaging
Date: Monday, April 22, 2024 3:33:47 PM
Attachments: [image001.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)
[image009.png](#)
[2024 AMP Valparaiso Road fugitives calcs.xlsx](#)

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Hi Daria,

Please see attached fugitive calculations. Note: The facility has no unpaved roads.

As always, please let me know if you have any questions.

Thank you,
Tracie

From: Antipova, Daria <DAntipov@idem.IN.gov>
Sent: Tuesday, April 9, 2024 3:21 PM
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To: Grayson, Michael <michael.grayson@ardaghgroup.com>

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Daria Antipova, Environmental Engineer

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[Indiana Department of Environmental Management](http://www.in.gov/indiana-department-of-environmental-management)



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We appreciate your input!



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**Appendix A: Emission Calculations
Fugitive Dust Emissions - Unpaved Roads**

Company Name:
Source Address:
Permit Number:
Reviewer:

Unpaved Roads at Industrial Site

The following calculations determine the amount of emissions created by unpaved roads, based on 8,760 hours of use and AP-42, Ch 13.2.2 (11/2006).

Vehicle Information (provided by source)

Type	Maximum number of vehicles	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight of Loaded Vehicle (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Vehicle (entering plant) (one-way trip)	1.0	1.0	1.0	0.0	0.0	0	0.000	0.0	0.0
Vehicle (leaving plant) (one-way trip)	1.0	1.0	1.0	0.0	0.0	0	0.000	0.0	0.0
			0.0		0.0		0.000	0.0	0.0
			0.0		0.0		0.000	0.0	0.0
Totals			2.0		0.0			0.0	0.0

Average Vehicle Weight Per Trip = 0.0 tons/trip
Average Miles Per Trip = 0.00 miles/trip

Unmitigated Emission Factor, Ef = $k \cdot [(s/12)^a] \cdot [(W/3)^b]$ (Equation 1a from AP-42 13.2.2)

	PM	PM10	PM2.5	
where k =	4.9	1.5	0.15	lb/mi = particle size multiplier (AP-42 Table 13.2.2-2 for Industrial Roads)
s =	9.7	9.7	9.7	% = mean % silt content of unpaved roads (AP-42 Table 13.2.2-1 Iron and Steel Production)
a =	0.7	0.9	0.9	= constant (AP-42 Table 13.2.2-2 for Industrial Roads)
W =	0.0	0.0	0.0	tons = average vehicle weight
b =	0.45	0.45	0.45	= constant (AP-42 Table 13.2.2-2 for Industrial Roads)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = $E \cdot [(365 - P)/365]$ (Equation 2 from AP-42 13.2.2)

Mitigated Emission Factor, Eext = $E \cdot [(365 - P)/365]$
where P = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	0.00	0.00	0.00	lb/mile
Mitigated Emission Factor, Eext =	0.00	0.00	0.00	lb/mile
Dust Control Efficiency =	50%	50%	50%	(pursuant to control measures outlined in fugitive dust control plan)

Process	Mitigated PTE of PM (Before Control) (tons/yr)	Mitigated PTE of PM10 (Before Control) (tons/yr)	Mitigated PTE of PM2.5 (Before Control) (tons/yr)	Mitigated PTE of PM (After Control) (tons/yr)	Mitigated PTE of PM10 (After Control) (tons/yr)	Mitigated PTE of PM2.5 (After Control) (tons/yr)
Vehicle (entering plant) (one-way trip)	0.00	0.00	0.00	0.00	0.00	0.00
Vehicle (leaving plant) (one-way trip)	0.00	0.00	0.00	0.00	0.00	0.00
	0.00	0.00	0.00	0.00	0.00	0.00
	0.00	0.00	0.00	0.00	0.00	0.00
Totals	0.00	0.00	0.00	0.00	0.00	0.00

Methodology

Total Weight driven per day (ton/day) = [Maximum Weight of Loaded Vehicle (tons/trip)] * [Maximum trips per day (trip/day)]
Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]
Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] * [Maximum one-way distance (mi/trip)]
Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]
Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]
Mitigated PTE (Before Control) (tons/yr) = (Maximum one-way miles (miles/yr)) * (Mitigated Emission Factor (lb/mile)) * (ton/2000 lbs)
Mitigated PTE (After Control) (tons/yr) = (Mitigated PTE (Before Control) (tons/yr)) * (1 - Dust Control Efficiency)

Abbreviations

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

**Appendix A: Emission Calculations
Fugitive Dust Emissions - Paved Roads**

Company Name:
Source Address:
Permit Number:
Reviewer:

Paved Roads at Industrial Site

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

Vehicle Information (provided by source)

Type	Maximum number of vehicles per day	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight of Loaded Vehicle (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Semi (entering plant) (Shipping)	23.0	1.0	23.0	18.0	414.0	355	0.067	1.5	564.4
Semi (leaving plant)	23.0	1.0	23.0	38.0	874.0	355	0.067	1.5	564.4
Semi (entering plant) (Receiving)	2.0	1.0	2.0	53.0	106.0	355	0.067	0.1	49.1
Semi (leaving plant)	2.0	1.0	2.0	17.0	34.0	355	0.067	0.1	49.1
Generic (Mail Delivery)	7.0	1.0	7.0	4.0	28.0	355	0.067	0.5	171.8
Employee Vehicles	60.0	1.0	60.0	3.0	180.0	501	0.095	5.7	2078.0
Totals			117.0		1636.0			9.5	3476.8

Average Vehicle Weight Per Trip = 14.0 tons/trip
Average Miles Per Trip = 0.08 miles/trip

Unmitigated Emission Factor, $E_f = [k * (sL)^{0.91} * (W)^{1.02}]$ (Equation 1 from AP-42 13.2.1)

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	14.0	14.0	14.0	tons = average vehicle weight
sL =	9.7	9.7	9.7	g/m ² = silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, $E_{ext} = E_f * [1 - (p/4N)]$ (Equation 2 from AP-42 13.2.1)

Mitigated Emission Factor, $E_{ext} = E_f * [1 - (p/4N)]$
where p = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
N = 365 days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, $E_f =$	1.282	0.256	0.0629	lb/mile
Mitigated Emission Factor, $E_{ext} =$	1.172	0.234	0.0575	lb/mile
Dust Control Efficiency =	50%	50%	50%	(pursuant to control measures outlined in fugitive dust control plan)

Process	Mitigated PTE of PM (Before Control) (tons/yr)	Mitigated PTE of PM10 (Before Control) (tons/yr)	Mitigated PTE of PM2.5 (Before Control) (tons/yr)	Mitigated PTE of PM (After Control) (tons/yr)	Mitigated PTE of PM10 (After Control) (tons/yr)	Mitigated PTE of PM2.5 (After Control) (tons/yr)
Semi (entering plant) (Shipping)	0.33	0.07	0.02	0.17	0.03	0.01
Semi (leaving plant)	0.33	0.07	0.02	0.17	0.03	0.01
Semi (entering plant) (Receiving)	0.03	0.01	0.00	0.01	0.00	0.00
Semi (leaving plant)	0.03	0.01	0.00	0.01	0.00	0.00
Generic (Mail Delivery)	0.10	0.02	0.00	0.05	0.01	0.00
Employee Vehicle	1.22	0.24	0.06	0.61	0.12	0.03
Totals	2.04	0.41	0.10	1.02	0.20	0.05

Methodology

Total Weight driven per day (ton/day) = [Maximum Weight of Loaded Vehicle (tons/trip)] * [Maximum trips per day (trip/day)]
Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]
Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] * [Maximum one-way distance (mi/trip)]
Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]
Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]
Unmitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] * [Unmitigated Emission Factor (lb/mile)] * (ton/2000 lbs)
Mitigated PTE (Before Control) (tons/yr) = [Maximum one-way miles (miles/yr)] * [Mitigated Emission Factor (lb/mile)] * (ton/2000 lbs)
Mitigated PTE (After Control) (tons/yr) = [Mitigated PTE (Before Control) (tons/yr)] * [1 - Dust Control Efficiency]

Abbreviations

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

The tables below include examples of common vehicles and their approximate weights (unloaded vehicle weights and maximum load capacities will vary based on the actual type/size/model/capacity transported in the vehicles at the source.

Vehicle Type	Maximum Weight of Unloaded Vehicle (tons)	Load Capacity (cubic yards)
Dump truck (8 cubic yard capacity)	8.0	6.0
Dump truck (10 cubic yard capacity)	12.5	10.0
Dump truck (12 cubic yard capacity)	14.0	12.0
Dump truck (16 cubic yard capacity)	15.0	16.0
Dump truck (20 cubic yard capacity)	16.0	20.0
Dump truck (24 cubic yard capacity)	20.0	24.0
Front-end loader (3 cubic yard capacity)	15.0	3.0

Vehicle Type	Maximum Weight of Unloaded Vehicle (tons)	Load Capacity (cubic yards)
Passenger Car (4-door)	2.0	0.50
Sport Utility Vehicle (4-door)	3.0	0.60
Pickup Truck	2.5	2.80
Cargo Van	2.6	8.70
Moving Truck (2-axle) (10' Straight Truck)	2.9	14.8
Moving Truck (2-axle) (14' Straight Truck)	4.0	24.8
Moving Truck (2-axle) (17' Straight Truck)	4.1	31.7
Moving Truck (2-axle) (24' Straight Truck)	5.8	51.9
Moving Truck (2-axle) (26' Straight Truck)	6.3	59.0
Freight Truck (3 axles)	11.0	NA
Freight Truck (4 axles)	13.0	NA
Freight Truck (5 axles)	15.0	NA
Freight Truck (6 axles)	16.0	NA

Vehicle Type	Maximum Weight of Unloaded Vehicle (tons)	Load Capacity (cubic yards)
--------------	---	-----------------------------

Grain Tanker (5 axle bulk dry tanker) (900 bushel capacity)	15.0	40.0
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Vehicle Type	Maximum Weight of Unloaded Vehicle (tons)	Load Capacity (gallons)
Tanker Truck (6000 gal)	16.0	6000

Vehicle Type	Maximum Weight of Unloaded Vehicle (tons)	Load Capacity (cubic yards)
Dump truck (8 cubic yard capacity)	8.0	6.0
Dump truck (10 cubic yard capacity)	12.5	10.0
Dump truck (12 cubic yard capacity)	14.0	12.0
Dump truck (16 cubic yard capacity)	15.0	16.0
Dump truck (20 cubic yard capacity)	16.0	20.0
Dump truck (24 cubic yard capacity)	20.0	24.0
Front-end loader (3 cubic yard capacity)	15.0	3.0

**) and maximum load capacities. These are just approximate values and actual
ity of the vehicles used by the source and the type/bulk density of the materials**

Material Loaded	Bulk Density of Material (lbs/cubic foot)	Maximum Weight of Load (tons)	Maximum Weight of Loaded Vehicle (tons/trip)
crushed stone, dry sand, or soil	100	8.1	16.1
crushed stone, dry sand, or soil	100	13.5	26.0
crushed stone, dry sand, or soil	100	16.2	30.2
crushed stone, dry sand, or soil	100	21.6	36.6
crushed stone, dry sand, or soil	100	27.0	43.0
crushed stone, dry sand, or soil	100	32.4	52.4
crushed stone, dry sand, or soil	100	4.1	19.1

Material Loaded	Bulk Density of Material (lbs/cubic foot)	Maximum Weight of Load (tons)	Maximum Weight of Loaded Vehicle (tons/trip)
Not Needed (assumed load)	Not Needed (assumed load)	0.7	2.7
Not Needed (assumed load)	Not Needed (assumed load)	1.0	4.0
Not Needed (assumed load)	Not Needed (assumed load)	0.7	3.2
Not Needed (assumed load)	Not Needed (assumed load)	1.9	4.5
Not Needed (assumed load)	Not Needed (assumed load)	1.3	4.2
Not Needed (assumed load)	Not Needed (assumed load)	1.5	5.5
Not Needed (assumed load)	Not Needed (assumed load)	2.9	7.0
Not Needed (assumed load)	Not Needed (assumed load)	3.2	9.0
Not Needed (assumed load)	Not Needed (assumed load)	3.7	10.0
Not Needed (assumed load)	Not Needed (assumed load)	16.0	27.0
Not Needed (assumed load)	Not Needed (assumed load)	22.0	35.0
Not Needed (assumed load)	Not Needed (assumed load)	25.0	40.0
Not Needed (assumed load)	Not Needed (assumed load)	32.0	48.0

Material Loaded	Bulk Density of Material (lbs/cubic foot)	Maximum Weight of Load (tons)	Maximum Weight of Loaded Vehicle (tons/trip)
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Grain (corn or soybeans)	46	24.8	39.8
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Material Loaded	Bulk Density of Material (lbs/cubic foot)	Maximum Weight of Load (tons)	Maximum Weight of Loaded Vehicle (tons/trip)
water	62.4	25.0	41.0

Material Loaded	Bulk Density of Material (lbs/cubic foot)	Maximum Weight of Load (tons)	Maximum Weight of Loaded Vehicle (tons/trip)
broken coal (bituminous)	52	4.2	12.2
broken coal (bituminous)	52	7.0	19.5
broken coal (bituminous)	52	8.4	22.4
broken coal (bituminous)	52	11.2	26.2
broken coal (bituminous)	52	14.0	30.0
broken coal (bituminous)	52	16.8	36.8
broken coal (bituminous)	52	2.1	17.1

From: [Grayson, Michael](#)
To: [Antipova, Daria](#)
Cc: [Sorvillo, Tracie](#); [Murphy, Matthew](#)
Subject: FW: Applicant Review for TV/Renewal No. T 127-47698-00030 for Ardagh Metal Packaging
Date: Thursday, June 13, 2024 2:51:49 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image009.png](#)
[image008.png](#)
[47698pn.docx](#)
[47698tsd.docx](#)
[47698calcs.xlsx](#)
[47698per.docx](#)
Importance: High

**** This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. ****

Daria,

Copying Matt Murphy. Matt is now Plant Manager for the Ardagh Metal Packaging plant in Valparaiso, IN.

Best Regards,

Mike Grayson

Manufacturing Director
Ardagh Metal Packaging - North America

M: +1 219 241 4065

www.ardaghgroup.com

From: Antipova, Daria <DAntipov@idem.IN.gov>
Sent: Thursday, June 13, 2024 11:14 AM
To: Sorvillo, Tracie <Tracie.Sorvillo@ardaghgroup.com>; Grayson, Michael <Michael.Grayson@ardaghgroup.com>
Subject: Applicant Review for TV/Renewal No. T 127-47698-00030 for Ardagh Metal Packaging
Importance: High

Information Security Warning: This email comes from an external source. Please be careful when clicking on the links and attachments. You can report suspicious emails via the Report Message Add-in.

Dear Michael Grayson, Tracie Sorvillo:

Attached is the draft TV/Renewal and supporting documents for review. As a courtesy, this draft is being provided to you for an opportunity to review and provide comments prior to posting the public notice on IDEM's website. This supplemental step of providing you the draft permit does not take away your legal right to provide comments during the thirty (30) day comment period.

The time clock for TV/Renewal No.: T 127-47698-00030 will be stopped during your review until you either provide comments or indicate that you do not have any comments. Due to permit accountability and IDEM's intention to public notice the permit in a timely manner, you are being allotted *two (2) weeks* from today to provide comments in writing, email is sufficient. If you have any conflicts or special circumstances that would impede your review process during the time allotted, please notify me directly at the email address or phone number listed below as soon as possible. If you have not responded on or before *June 28, 2024*, IDEM will assume that you have no comments pertaining to this draft and all files will be forwarded for public notice.

During this review period, I will be available to address your concerns, answer any questions that you may have, or make necessary revisions to this draft.

Please send a reply email to me immediately confirming that you have received this draft version of the permit for review and that you are able to access these files in their current format.

Pursuant to 326 IAC 2-1.1-7, the fee for this permitting action is expected to be \$0.

Please note: This is not a bill. This represents the anticipated fee and is subject to change if additional review is required or the permit level changes for some reason (e.g. an additional NESHAP review is required). You will receive a final bill from the OAQ Permits Administration and Support Section.

Sincerely,



Daria Antipova, Environmental Engineer

Permits Branch • Office of Air Quality

(317) 234-3429 • DAntipov@idem.IN.gov

[Indiana Department of Environmental Management](http://www.in.gov/indiana-department-of-environmental-management)



INDIANA

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We appreciate your input!



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INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Eric J. Holcomb
Governor

Brian C. Rockensuess
Commissioner

NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding the Renewal of a
Part 70 Operating Permit

for Ardagh Metal Packaging in Porter County

Part 70 Operating Permit Renewal No.: T 127-47698-00030

The Indiana Department of Environmental Management (IDEM) has received an application from Ardagh Metal Packaging located at 4001 Montdale Park Drive, Valparaiso, IN 46383 for a renewal of its Part 70 Operating Permit issued on January 3, 2020. If approved by IDEM's Office of Air Quality (OAQ), this proposed renewal would allow Ardagh Metal Packaging to continue to operate its existing source.

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

A copy of the permit application and IDEM's preliminary findings have been sent to:

Porter County Public Library System
103 Jefferson St.,
Valparaiso, IN 46383

and

IDEM Northwest Regional Office
330 W. US Highway 30, Suites E & F
Valparaiso, IN 46385

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

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

How can you participate in this process?

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

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the **air pollution impact** of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If IDEM decides to conduct a public hearing and/or public meeting, IDEM will post

a separate announcement of the date, time, and location of that public hearing and/or public meeting on IDEM's website (<https://www.in.gov/idem/public-notices/>). At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number T 127-47698-00030 in all correspondence.

Comments should be sent to:

Daria Antipova
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for Daria Antipova or (317) 234-3429
Or dial directly: (317) 234-3429
Fax: (317) 232-6749 attn: Daria Antipova
E-mail: dantipov@idem.IN.gov

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

For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: <https://www.in.gov/idem/airpermit/public-participation/>; and the Citizens' Guide to IDEM on the Internet at: <https://www.in.gov/idem/resources/citizens-guide-to-idem/>.

What will happen after IDEM makes a decision?

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

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

Josiah K. Balogun, Section Chief
Permits Branch
Office of Air Quality

**Indiana Department of Environmental Management
Office of Air Quality**

**Technical Support Document (TSD) for a Part 70 Operating Permit
Renewal**

Source Description and Location

Source Name: Ardagh Metal Packaging
Source Location: 4001 Montdale Park Drive, Valparaiso, Indiana 46383
County: Porter (Washington Township)
SIC Code: 3411 (Metal Cans)
Permit Renewal No.: T 127-47698-00030
Permit Reviewer: Daria Antipova

On April 2, 2024, Ardagh Metal Packaging submitted an application to the Office of Air Quality (OAQ) requesting to renew its operating permit. OAQ has reviewed the operating permit renewal application from Ardagh Metal Packaging relating to the operation of a stationary can end manufacturing plant. Ardagh Metal Packaging was issued its first Part 70 Operating Permit (T 127-41793-00030) on January 3, 2020.

Existing Approvals

The source was issued Part 70 Operating Permit No. T 127-41793-00030 on January 3, 2020. The source has since received the following approval:

Permit Type	Permit Number	Issuance Date
Significant Source Modification	127-42738-00030	June 12, 2020
Significant Permit Modification	127-42797-00030	July 1, 2020
Administrative Amendment	127-47456-00030	March 28, 2024

All terms and conditions of previous permits issued pursuant to permitting programs approved into the State Implementation Plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units:

- (a) One (1) can end manufacturing line, constructed in 1989, identified as Module #1, consisting of one (1) shell blanking press, four (4) HSL-8 lid liners, tab lube application, and four (4) conversion presses, with a maximum capacity of 520,000 ends per hour, with no controls, exhausting to the atmosphere.
- (b) One (1) can end manufacturing line, constructed in 1989, identified as Module #2, consisting of one (1) shell blanking press, four (4) HSL-8 lid liners, tab lube application, and three (3) conversion presses, with a maximum capacity of 450,000 ends per hour, with no controls, exhausting to the atmosphere.
- (c) One (1) can end manufacturing line, constructed in 1989, identified as Module #3, consisting of one (1) shell blanking press, four (4) HSL-8 lid liners, tab lube application, and three (3) conversion presses, with a maximum capacity of 450,000 ends per hour, with no controls, exhausting to the atmosphere.

- (d) One (1) can end manufacturing line, constructed in 1989, identified as Module #4, consisting of one (1) shell blanking press, four (4) HSL-8 lid liners, tab lube application, and three (3) conversion presses, with a maximum capacity of 450,000 ends per hour, with no controls, exhausting to the atmosphere.
- (e) One (1) can end manufacturing line, constructed in 2000, and modified in 2024, identified as Module #5, consisting of one (1) three lane conversion press, one (1) compound liner, tab lube application, and one (1) six out shell press, with a maximum capacity of 180,000 ends per hour, with no controls, and exhausting to the atmosphere.
- (f) One (1) can end manufacturing line, identified as Module #6, constructed in 2018, consisting of one (1) shell blanking press, eight (8) curlers, identified as #1-#8; two (2) lid liners; tab lube application; one (1) conversion press, identified as CP-61, with a maximum capacity of 180,000 ends per hour; approved in 2019 for modification to add one (1) conversion press, identified as CP-62, with a maximum capacity of 180,000 ends per hour; and approved in 2020 for modification to add one (1) conversion press, identified as CP-63, with a maximum capacity of 306,000 ends per hour, with no controls, exhausting to the atmosphere.

Insignificant Activities

The source also consists of the following insignificant activities:

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
 - (1) One (1) natural gas-fired air make-up unit rated at 1,878,000 Btu/hr; and
 - (2) Sixteen (16) natural gas-fired direct heating units, each rated at 250,000 Btu/hr.
- (b) Propane or liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than six (6) million Btu per hour.
- (c) Vessels storing lubricating oils (including tab lube), hydraulic oils, machining oils and machining fluids.
- (d) Particulate emissions from recycled trim material recovery.
- (e) South Cooling Tower; induced draft, 480 gal/min.
- (f) North Cooling Tower; induced draft, 600 gal/min.
- (g) Blowdown from sight glasses, boilers, cooling towers, compressors, and pumps.
- (h) Paved roads and parking lots [326 IAC 6-4].

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

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

County Attainment Status

The source is located in Porter County (Washington Township).

Pursuant to amendments to Indiana Code IC 13-17-3-14, effective July 1, 2023, a federal regulation that classifies or amends a designation of attainment, nonattainment, or unclassifiable for any area in Indiana under the federal Clean Air Act is effective and enforceable in Indiana on the effective date of the federal regulation.

Pollutant	Designation
SO ₂	Unclassifiable or attainment effective April 30, 2021, for the 2010 primary 1-hour SO ₂ standard. Cannot be classified effective March 3, 1978, for the national secondary standards for the area bounded on the north by Lake Michigan; on the west by the Lake County and Porter County line; on the south by I-80 and I-90; and on the east by the LaPorte County and Porter County line. Better than national secondary standards effective March 3, 1978, for the remainder of the county.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Attainment effective May 20, 2022, for the 2008 8-hour ozone standard.
O ₃	Moderate nonattainment effective November 7, 2022, for the 2015 8-hour ozone standard for Center, Jackson, Liberty, Pine, Portage, Union, Washington, and Westchester townships. Unclassifiable or attainment effective August 3, 2018, for the remainder of the county.
PM _{2.5}	Unclassifiable or attainment effective January 28, 2019, for the 2012 annual PM _{2.5} standard.
PM _{2.5}	Unclassifiable or attainment effective December 13, 2009, for the 2006 24-hour PM _{2.5} standard.
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Unclassifiable or attainment effective January 29, 2012, for the 2010 NO ₂ standard.
Pb	Unclassifiable or attainment effective December 31, 2011, for the 2008 lead standard.

- (a) **Ozone Standards**
 U.S. EPA, in the Federal Register Notice 87 FR 60897 dated October 7, 2022, designated Porter County, Washington Township, as moderate nonattainment for the 2015 8-hour ozone standard effective November 7, 2022. Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Therefore, VOC and NOx emissions were evaluated pursuant to the requirements of Emission Offset, 326 IAC 2-3.
- (b) **PM_{2.5}**
 Porter County has been classified as attainment for PM_{2.5}. Therefore, direct PM_{2.5}, SO₂, and NOx emissions were reviewed pursuant to the requirements of Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) **Other Criteria Pollutants**
 Porter County has been classified as attainment or unclassifiable in Indiana for all the other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

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

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

Greenhouse Gas (GHG) Emissions

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

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

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

	Unrestricted Potential Emissions (ton/year)								
	PM ¹	PM ₁₀ ¹	PM _{2.5} ^{1, 2}	SO ₂	NO _x	VOC	CO	Single HAP	Total HAPs
Module #1	2.58	2.58	2.58	-	-	23.06	-	-	-
Module #2	2.23	2.23	2.23	-	-	19.96	-	-	-
Module #3	2.23	2.23	2.23	-	-	19.96	-	-	-
Module #4	2.23	2.23	2.23	-	-	19.96	-	-	-
Module #5	0.89	0.89	0.89	-	-	7.98	-	-	-
Module #6	3.30	3.30	3.30	-	-	29.54	-	-	-
Clean-up Solvent	-	-	-	-	-	0.51	-	-	-
LP/Propane Gas Combustion	0.06	0.20	0.20	0.01	3.73	0.29	2.15	-	-
NG combustion: Make up Unit	0.02	0.06	0.06	0.005	0.81	0.04	0.68	0.01	0.02
NG Combustion: 16 Direct Heaters	0.03	0.13	0.13	0.01	1.72	0.09	1.44	0.03	0.03
North Cooling Tower	0.03	0.02	0.01	-	-	-	-	-	-
South Cooling Tower	0.04	0.03	0.01	-	-	-	-	-	-
Total PTE of Entire Source Excluding Fugitive Emissions*	13.64	13.91	13.88	0.02	6.26	121.40	4.27	0.05	0.05
Title V Major Source Thresholds	NA	100	100	100	100	100	100	10	25
PSD Major Source Thresholds	250	250	250	250	250	250	250	--	--
Emission Offset Major Source Thresholds	---	NA	NA	NA	100	100	NA	--	--

¹Under the Part 70 Permit program (40 CFR 70), PM₁₀ and PM_{2.5}, not particulate matter (PM), are each considered as a "regulated air pollutant."

²PM_{2.5} listed is direct PM_{2.5}.

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

	Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)								
	PM ¹	PM ₁₀ ¹	PM _{2.5} ^{1, 2}	SO ₂	NO _x	VOC	CO	Single HAP	Total HAPs
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA
Emission Offset Major Source Thresholds	--	NA	NA	NA	100	100	NA	NA	NA

¹Under the Part 70 Permit program (40 CFR 70), PM₁₀ and PM_{2.5}, not particulate matter (PM), are each considered as a "regulated air pollutant."
²PM_{2.5} listed is direct PM_{2.5}.
 *Fugitive HAP emissions are always included in the source-wide emissions.

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

The source opted to take limit(s) in order to render the requirements of 326 IAC 2-3 (Emission Offset) not applicable to this source. See Technical Support Document (TSD) State Rule Applicability - Entire Source section, and 326 IAC 2-3 (Emission Offset), for more information regarding the limit(s).

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant is emitted at a rate of two hundred fifty (250) tons per year or more and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).
- (b) This existing source is a major stationary source, under Emission Offset (326 IAC 2-3), because VOC a nonattainment regulated pollutant, is emitted at a rate of 100 tons per year or more.
- (c) This source is not a major source of HAP, as defined in 40 CFR 63.2, because HAP emissions are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

Federal Rule Applicability

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

New Source Performance Standards (NSPS):

- (a) The requirements of the New Source Performance Standard for the Beverage Can Surface Coating Industry, 40 CFR 60, Subpart WW and 326 IAC 12, are not included in the permit for this source, because this NSPS applies to the coating of beverage cans which is defined as any two-piece steel or aluminum container. Module #1 through Module #6 are used for manufacturing and coating of only beverage can ends.
- (b) There are no other New Source Performance Standards (40 CFR Part 60) and 326 IAC 12 included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP):

- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Metal Cans, 40 CFR 63, Subpart KKKK and 326 IAC 20-86, are not included in the permit for this source, since the source primarily engaged in production of metal can ends, not the coating, and because the source is an area source of HAPs.
- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Nine Metal Fabrication and Finishing Source Categories, 40 CFR 63, Subpart XXXXXX, are not included in the permit for this source, since the source is not using materials that contain finishing metal HAPs (compounds of cadmium, chromium, lead, manganese, and nickel).

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

Compliance Assurance Monitoring (CAM):

- (a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to each existing pollutant-specific emission unit that meets the following criteria:
- (1) has a potential to emit before controls equal to or greater than the major source threshold for the regulated pollutant involved;
 - (2) is subject to an emission limitation or standard for that pollutant (or a surrogate thereof); and
 - (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.
- (b) Pursuant to 40 CFR 64.2(b)(1)(i), emission limitations or standards proposed after November 15, 1990, pursuant to a NSPS or NESHAP under Section 111 or 112 of the Clean Air Act are exempt from the requirements of CAM. Therefore, an evaluation was not conducted for any emission limitations or standards proposed after November 15, 1990, pursuant to a NSPS or NESHAP under Section 111 or 112 of the Clean Air Act.

Since all emission units do not utilize control devices and no emission unit has the PTE at Part 70 major threshold levels, the requirements of 40 CFR Part 64, CAM are not applicable to any existing emission units as part of this Part 70 permit renewal.

State Rule Applicability - Entire Source

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

326 IAC 2-2 (PSD)

This source is stationary can end manufacturing plant is not one (1) of the 28 listed source categories. This source is not a major stationary source, under 326 IAC 2-2 (PSD), because the emissions of each PSD regulated pollutant are less than the PSD major source thresholds.

326 IAC 2-3 (Emission Offset)

This source is located in Porter County, it is existing major Emission Offset stationary, and will continue to be major under 326 IAC 2-3 (Emission Offset), since the emissions of the nonattainment pollutant, volatile organic compounds (VOC), will continue to be equal to or greater than one hundred (100) tons per year.

SPM 127-42797-00030, issued on July 1, 2020

The VOC net emissions increase from the modification of Module #6 is greater than 25 tons per year, which is subject to 326 IAC 2-3 (Emission Offset). However, the source opted to take a federally enforceable limit, limiting the VOC emissions from Module #6 at De Minimis level (<25 tons/year) to avoid the requirements of 326 IAC 2-3.

EO Minor Modification Limit

In order to render the requirements of 326 IAC 2-3 (Emission Offset) not applicable, the Permittee shall comply with the following:

The total amount of VOC usage from the can end manufacturing line, identified as Module #6, shall not exceed twenty four (24) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this condition shall limit the VOC emissions from this modification of Module #6 to the De Minimis level of less than twenty five (25) tons per twelve (12) consecutive month and shall render the requirements 326 IAC 2-3 (Emission Offset) not applicable to the 2020 Modification.

TV Renewal T 127-32478-00030, issued on July 26, 2013

The source, prior to transitioning to a MSOP M127-33668-00030, issued on May 1, 2014, was operating under Part 70 Permit No. T127-32478-00030, issued on July 26, 2013. This Part 70 Permit included a VOC emissions limit of 80.8 tons/year for the existing Module #1 through Module #5 to avoid the requirements of 326 IAC 2-3, Emission Offset. This limit of 80.8 tons/year went away when the source transitioned to MSOP due to the re-designation of Porter County to a moderate non-attainment for ozone with an applicable EO major source threshold of 100 tons/year for VOC.

When Ardagh became a Part 70 source again due to the re-designation of Porter County to serious nonattainment for ozone, effective September 23, 2019, this VOC limit of 80.8 tons/year should have been added back when Part 70 Permit T127-41793-00030 was issued on January 3, 2020, based on the anti-backsliding provisions of the Clean Air Act.

At the time of SSM No. 127-42738-00030, issued on June 12, 2020, and associated SPM No. 127-42797-00030, issued on July 1, 2020, this VOC limit of 80.8 tons per year was incorporated back into the Part 70 Operating Permit to fix this inadvertent error. See below EO limit:

EO Minor Limit

Pursuant to Permit No. T127-32478-00030, issued on July 26, 2013, and in order to render the requirements of 326 IAC 2-3 (Emission Offset) not applicable, the Permittee shall comply with the following:

The total amount of VOC usage from the five (5) can end manufacturing Modules #1 through #5 shall not exceed 80.8 tons of VOC per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this limit shall limit the VOC emissions from the modification of Module #1 – Module #5 to less than one hundred (100) tons per twelve (12) consecutive month and shall render the requirements 326 IAC 2-3 (Emission Offset) not applicable to the 2013 modification.

This limit of 80.8 tons/year was re-established many times over when Modules #1 through #5 were modified from 1989 to 2003 taking into consideration Porter County's severe nonattainment and then moderate nonattainment county status at the times when these modifications were made.

326 IAC 2-6 (Emission Reporting)

This source is subject to the requirements of 326 IAC 2-6 (Emission Reporting), since it is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, is located in Porter County, Washington Township, and emits VOC into the ambient air at levels equal to or greater than twenty-five (25) tons per year. Pursuant to 326 IAC 2-6-3(a)(1) and 326 IAC 2-6-3(a)(2), the Permittee shall submit, by July 1, an emission statement covering the previous calendar year as follows:

- (a) triennially, in accordance with the compliance schedule in 326 IAC 2-6-3, and
- (b) each year when the source emits volatile organic compounds or oxides of nitrogen into the ambient air at levels equal to or greater than twenty-five (25) tons during the previous calendar year.

The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 2-7-6(5) (Annual Compliance Certification)

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

326 IAC 5-1 (Opacity Limitations)

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

326 IAC 6-4 (Fugitive Dust Emissions Limitations)

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

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

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

State Rule Applicability – Individual Facilities

State rule applicability has been reviewed as follows:

Module #1 through Module #6 can end lines

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-1(7), the can end manufacturing lines, identified as Modules #1 through #6, are not subject to the requirements of 326 IAC 6-3 because each lining machine utilizes flow coating technique to apply a paste-like coating to the end seals.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)

- (a) Even though, the can end manufacturing lines, identified as Module #1 through Module #5, were each constructed after January 1, 1980, they not subject to the requirements of 326 IAC 8-1-6 because the tab lube application in each can end line has an unlimited VOC potential emissions of less than twenty-five (25) tons per year.
- (b) The can end manufacturing line, identified as Module #6, was constructed after January 1, 1980, and its unlimited VOC potential emissions are equal to or greater than twenty-five (25) tons per year the application of lubricant (tab lube) in Module #6 is not regulated by other rules in 326 IAC 8.

The source has opted to limit the potential to emit VOC from the application of lubricant (tab lube) in Module #6 to less than twenty-five (25) tons per twelve (12) consecutive month period in order to render the requirements of 326 IAC 8-1-6 not applicable. Therefore, the can end manufacturing line, identified as Module #6, is not subject to the requirements of 326 IAC 8-1-6.

In order to render the requirements of 326 IAC 8-1-6 not applicable, Permittee shall comply with the following:

The total amount of VOC usage from can end manufacturing line, identified as Module #6, shall not exceed twenty-four (24) tons of VOC per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this limit shall limit the VOC emissions from Module #6 to less than twenty-five (25) tons per year and shall render the requirements 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) not applicable to the Module #6.

326 IAC 8-2-3 (Can Coating Operations)

- (a) Pursuant to 326 IAC 8-2-3(b)(4), the can end manufacturing lines, identified as Module #1 through Module #5, and the application of can end seal compound at the Module #6 shall not cause, allow or permit the discharge into the atmosphere of any volatile organic compounds in excess of 3.7 pounds per gallon excluding water. The source will comply with this limitation through the use of a compliant coating.
- (b) Pursuant to 326 IAC 8-2-3(b)(4), the application of tab lube is not subject to 326 IAC 8-2-3 because tab lube is not considered an "end seal compound".

326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating Operations)

The application of tab lube in Module #1 through Module #6 can end lines is not subject to 326 IAC 8-2-9 because the tab lube is not used to coat the can ends; rather, it is applied to the conversion press tooling that forms the tabs in order to control heat generated.

"Tab Lube" is a lubricant used for the conversion press tooling and provides the lubricant needed when that tooling forms the tab (which is then placed on each can end). Using the tab stock (a narrow aluminum coil) as the carrier for the lubricant versus spraying on the tooling is a more efficient process which results in the need for less lubricant. Tab lube is automatically piped from a storage tank to an enclosed 1-gallon container located at each conversion press. The tab lube is then allowed to gravity-feed from this container through two small "drippers" which control the rate of flow to two felt pads. The pads are positioned on top and on the bottom of the tab stock. These pads provide a consistent amount of lubrication to the tooling via the tab stock as the stock is being fed into the press. The process of dripping and the use of felt pads allow the lube to wick through the pads to the tab stock.

Natural Gas Combustion

326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)

One (1) natural gas-fired air makeup unit, and sixteen (16) natural gas-fired direct heating units, are not subjects to the requirements of 326 IAC 6-2 because these comfort heating units are not sources of indirect heating. Therefore, the provisions of 326 IAC 6-2 do not apply.

326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)

Each of the one (1) natural gas-fired air makeup unit, and sixteen (16) natural gas-fired direct heating units, is exempt from the requirements of 326 IAC 6-3-2, since liquid and gaseous fuels and combustion air are not considered as part of the process weight rate as defined in 326 IAC 1-2-59 .

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

Each of the One (1) natural gas-fired air makeup unit, and sixteen (16) natural gas-fired direct heating units, is not subject to the requirements of 326 IAC 8-1-6, since each unit has unlimited VOC potential emissions of less than twenty-five (25) tons per year.

North and South Cooling Towers

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-1(11), two (2) cooling towers, identified as North Cooling Tower and South Cooling Tower, are exempt from 326 IAC 6-3. Therefore, the provisions of 326 IAC 6-3-2 are not included for the two (2) cooling towers.

Recycled trim material recovery process

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-2(e)(2), the allowable particulate emission rate from the recycled trim material recovery equipment shall not exceed five hundred fifty-one thousandths (0.551) pounds per hour when operating at a process weight rate of less than one hundred (100) pounds per hour.

Compliance Determination and Monitoring Requirements

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

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

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

Testing Requirements:

There are no testing requirements applicable to the source.

Pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a), in order to demonstrate compliance with the VOC content and usage limitations applicable to the six (6) can end manufacturing lines, identified as Module #1 through Module #6, the Permittee shall prepare or obtain from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets or Material Safety Data Sheets (MSDS) for each resin, gelcoat, catalyst, solvent and mold release agent used in the reinforced plastics composites manufacturing operations.

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on April 2, 2024.

The operation of this stationary can end manufacturing plant shall be subject to the conditions of the attached proposed Part 70 Operating Permit Renewal No. T 127-47698-00030.

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

IDEM Contact

- (a) If you have any questions regarding this permit, please contact Daria Antipova, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 234-3429 or (800) 451-6027, and ask for Daria Antipova or (317) 234-3429.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: <https://www.in.gov/idem/airpermit/public-participation/>; and the Citizens' Guide to IDEM on the Internet at: <https://www.in.gov/idem/resources/citizens-guide-to-idem/>.

**Appendix A: Emission Calculations
Summary of Emissions**

Company Name: Ardagh Metal Packaging
Source Address: 4001 Montdale Park Drive, Valparaiso, Indiana 46383
Operating Permit No.: T 127-47698-00030
Reviewer: Daria Antipova

Emission Units	Unlimited/Uncontrolled Potential to Emit (ton/yr)								
	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO	Single HAP (Hexane)	Total HAP
Significant Emission Units									
Module #1	2.58	2.58	2.58	-	-	23.06	-	-	-
Module #2	2.23	2.23	2.23	-	-	19.96	-	-	-
Module #3	2.23	2.23	2.23	-	-	19.96	-	-	-
Module #4	2.23	2.23	2.23	-	-	19.96	-	-	-
Module #5	0.89	0.89	0.89	-	-	7.98	-	-	-
Module #6	3.30	3.30	3.30	-	-	29.54	-	-	-
Clean-up Solvent	-	-	-	-	-	0.51	-	-	-
Insignificant Activities									
LP/Propane Gas Combustion	0.06	0.20	0.20	0.01	3.73	0.29	2.15	-	-
NG combustion: Make up Unit	0.02	0.06	0.06	0.005	0.81	0.04	0.68	0.01	0.02
NG Combustion: 16 Direct Heaters	0.03	0.13	0.13	0.01	1.72	0.09	1.44	0.03	0.03
North Cooling Tower	0.03	0.02	0.01	-	-	-	-	-	-
South Cooling Tower	0.04	0.03	0.01	-	-	-	-	-	-
Total	13.64	13.91	13.88	0.02	6.26	121.40	4.27	0.05	0.05

Emission Units	Limited Potential to Emit (ton/yr)								
	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO	Single HAP (Hexane)	Total HAP
Significant Emission Units									
^(d) Module #1	2.58	2.58	2.58	-	-	80.80	-	-	-
^(d) Module #2	2.23	2.23	2.23	-	-		-	-	-
^(d) Module #3	2.23	2.23	2.23	-	-		-	-	-
^(d) Module #4	2.23	2.23	2.23	-	-		-	-	-
^(d) Module #5	0.89	0.89	0.89	-	-		-	-	-
Module #6	3.30	3.30	3.30	-	-	24.0	-	-	-
Clean-up Solvent	-	-	-	-	-	0.51	-	-	-
Insignificant Activities									
LP/Propane Gas Combustion	0.06	0.20	0.20	0.01	3.73	0.29	2.15	-	-
NG combustion: Make up Unit	0.02	0.06	0.06	0.00	0.81	0.04	0.68	0.01	0.02
NG Combustion: 16 Direct Heaters	0.03	0.13	0.13	0.01	1.72	0.09	1.44	0.03	0.03
North Cooling Tower	0.03	0.02	0.01	-	-	-	-	-	-
South Cooling Tower	0.04	0.03	0.01	-	-	-	-	-	-
Total	13.64	13.91	13.88	0.02	6.26	105.69	4.27	0.05	0.05

Note: The original limit of 80.8 tons/yr required in T127-32478-00030 for Module #1-#5 went away when the source became an MSOP source due to redesignation of Porter County into a moderate non-attainment with EO major threshold of 100 tons/year VOC. Now that the source became a Part 70 source again this limit will again apply to the source.

Appendix A: Emission Calculations

Company Name: Ardagh Metal Packaging
 Source Address: 4001 Montdale Park Drive, Valparaiso, Indiana 46383
 Operating Permit No.: T 127-47698-00030
 Reviewer: Daria Antipova

Table B-1 contains Trade Secret Information and is Public Record Claimed Exempt in part. Therefore, portions have been removed from this Public Copy of the application.

Table B-1 -Module #1 - Module #6 Potential to Emit (a)

Material	Density ^{(b),(c)} (lb/gal)	H ₂ O + Organics ^{(b),(c)} (wt %)	Water ^{(b),(c)} (wt %)	Organics ^{(b),(c)} (wt %)	Water ^{(b),(c)} (vol %)	Solids ^{(b),(c)} (vol %)	Mat. Use ^(d) (gal/1000 units)	Production Rate ^(e)			Material Usage ^(f)			VOC Content ^(c)		Unrestricted Potential Emissions ^(h)				Limited PTE ^(h)								
								Potential (unit/hr)	Potential (unit/yr)	Limited (unit/yr)	Potential (gal/hr)	Potential (gal/yr)	Limited (gal/yr)	Coating, less water (lb/gal)	(lb/gal)	PM ^(g)		VOC		PM ^(g)	VOC							
																(lb/hr)	(ton/yr)	(lb/hr)	(ton/yr)			(ton/yr)	(ton/yr)					
MODULE #1																												
Can End Seal Compound - Water Based Material	10.3	34.0%	34.0%	0.0%	41.8%	58.0%						4.2	37,045	-	0	0	0.6	2.52	0	0	-	-						
Tab Lube Lubricant (Tab is Part of the Can end)	6.35	88.60%	0.01%	88.6%	-	11.40%						0.9	8,199	-	-	5.63	0.01	0.06	5.27	23.06	-	-						
Module #1 Total:																	0.59	2.58	5.27	23.06	-	-						
MODULE #2																												
Can End Seal Compound - Water Based Material	10.3	34.0%	34.0%	0.0%	41.8%	58.0%						3.7	32,058	-	0	0	0.5	2.18	0	0	-	-						
Tab Lube Lubricant (Tab is Part of the Can end)	6.35	88.60%	0.01%	88.6%	-	11.40%						0.8	7,096	-	-	5.63	0.01	0.05	4.56	19.96	-	-						
Module #2 Total:																	0.51	2.23	4.56	19.96	-	-						
MODULE #3																												
Can End Seal Compound - Water Based Material	10.3	34.0%	34.0%	0.0%	41.8%	58.0%						3.7	32,058	-	0	0	0.5	2.18	0	0	-	-						
Tab Lube Lubricant (Tab is Part of the Can end)	6.35	88.60%	0.01%	88.6%	-	11.40%						0.8	7,096	-	-	5.63	0.01	0.05	4.56	19.96	-	-						
Module #3 Total:																	0.51	2.23	4.56	19.96	-	-						
MODULE #4																												
Can End Seal Compound - Water Based Material	10.3	34.0%	34.0%	0.0%	41.8%	58.0%						3.7	32,058	-	0	0	0.5	2.18	0	0	-	-						
Tab Lube Lubricant (Tab is Part of the Can end)	6.35	88.60%	0.01%	88.6%	-	11.40%						0.8	7,096	-	-	5.63	0.01	0.05	4.56	19.96	-	-						
Module #4 Total:																	0.51	2.23	4.56	19.96	-	-						
MODULE #5																												
Can End Seal Compound - Water Based Material	10.3	34.0%	34.0%	0.0%	41.8%	58.0%						1.5	12,823	-	0	0	0.2	0.87	0	0	-	-						
Tab Lube Lubricant (Tab is Part of the Can end)	6.35	88.60%	0.01%	88.6%	-	11.40%						0.3	2,838	-	-	5.63	0.00	0.02	1.82	7.98	-	-						
Module #5 Total:																	0.20	0.89	1.82	7.98	-	-						
MODULE #6																												
Can End Seal Compound - Water Based Material	10.3	34.0%	34.0%	0.0%	41.8%	58.0%						5.4	47,446	38,470	0	0	0.7	3.23	0	0	2.62	0						
Tab Lube Lubricant (Tab is Part of the Can end)	6.35	88.60%	0.01%	88.6%	-	11.40%						1.2	10,501	8,515	-	5.63	0.02	0.08	6.74	29.54	0.06	24.0						
Module #6 Total:																	0.75	3.30	6.74	29.54	2.68	24.0						
*Module #1-#5 has a total limit in T32478 before becoming MSOP in M33668																	80.8											

* The original limit of 80.8 tons/yr for Module #1-#5 went away when the source became an MSOP source due to redesignation of Porter County into a moderate non-attainment with EO major threshold of 100 tons/year VOC. Now that the source became a Part 70 source again this limit will again apply to the source.

FACILITY WIDE CLEAN UP SOLVENT

Material	Density (lb/gal)	H ₂ O + Organics (wt %)	Water (wt %)	Organics (wt %)	Water (vol %)	Gal. Used	VOC Pounds gallon of solvent	Potential VOC pounds per hour	Potential VOC tons per year
Safety Kleen	6.80	100.00%	0.0%	100.0%	0.0%	150.0	6.8	0.1	0.51
TOTAL FACILITY WIDE CLEAN UP SOLVENT									0.51

Notes:

- (a) PTE for Modules #1 - #5 correspond to existing operations, represented in Technical Support Documents for permit T127-41793-00030. PTE and limited emission rates for Module #6 are as represented in this application for the proposed addition of conversion press CP-63.
- (b) Can end seal compound property data as presented in the Technical Support Document (TSD) for Transition to a Part 70 Permit No. T127-41793-00030, January 3, 2020.
- (c) Tab lube lubricant property data as presented in the Technical Support Document (TSD) for Transition to a Part 70 Permit No. T127-41793-00030, January 3, 2020.
- (d) End Seal Compound usage factor taken from Technical Support Document (TSD) for Transition to a Part 70 Permit No. T127-41793-00030, January 3, 2020. Tab Lube Lubricant usage factor taken from Technical Support Document (TSD) for Transition to a Part 70 Permit No. T127-41793-00030, January 3, 2020.
- (e) Production rates for Modules #1 - #5 represented in Technical Support Documents for permit T127-41793-00030. Production rates for Module #6 provided in 2/13/2020 e-mail from Matt Murphy of Ardagh. Hourly production rate reflects Module #6 design capacity after addition of CP-63. Annual potential production rate assumes continuous operation throughout the year. Limited annual production reflects the operating scenario that Ardagh is proposing to avoid Emission Offsets permitting requirements.
- (f) Material usage rates are determined by multiplying the material usage factor by each respective production rate.
- (g) It is conservatively assumed that potential emissions of PM₁₀ and PM_{2.5} will be equal to PM emissions.
- (h) Sample calculations:

Potential PM₁₀/PM_{2.5} [lb/hr] = Density [lb/gal] x [1-%H₂O,organics] x Usage Factor [gal/1,000 unit] x Production [units/hr] x [1-98% transfer eff.]
 Potential PM₁₀/PM_{2.5} [ton/yr] = Density [lb/gal] x [1-%H₂O,organics] x Usage Factor [gal/1,000 unit] x Production [units/hr] x [1-98% transfer eff.] x 8,760 [hr/yr] x 1 ton /2,000 lb
 Limited PM₁₀/PM_{2.5} [ton/yr] = Density [lb/gal] x [1-%H₂O,organics] x Usage Factor [gal/1,000 unit] x Limited Production [units/yr] x [1-98% transfer eff.] x 1 ton /2,000 lb
 Lube application via drip and felt pad (direct transference) -- minimal airborne expression. Transfer efficiency = 98%.
 Potential VOC [lb/hr] = VOC Content [lb/gal] x Usage Factor [gal/1,000 unit] x Production [units/hr]
 Potential VOC [ton/yr] = VOC Content [lb/gal] x Usage Factor [gal/1,000 unit] x Production [units/hr] x 8,760 [hr/yr] x 1 ton /2,000 lb
 Limited VOC [ton/yr] = VOC Content [lb/gal] x Usage Factor [gal/1,000 unit] x Limited Production [units/yr] x 1 ton /2,000 lb

**Appendix A: Emission Calculations
Table B-2 -Air Make Up Unit Heater**

Company Name: Ardagh Metal Packaging
Source Address: 4001 Montdale Park Drive, Valparaiso, Indiana 46383
Operating Permit No.: T 127-47698-00030
Reviewer: Daria Antipova

Heat Input Capacity	HHV	Potential Throughput
MMBtu/hr	mmBtu	mmscf
1.878	1020	16.1

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.02	0.06	0.06	0.005	0.81	0.04	0.68

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
 PM2.5 emission factor is filterable and condensable PM2.5 combined.
 **Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
 MMBtu = 1,000,000 Btu
 MMCF = 1,000,000 Cubic Feet of Gas
 Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03
 Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

HAP Calculations

Emission Factor in lb/MMcf	HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	Total - Organics
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	1.694E-05	9.677E-06	6.048E-04	1.452E-02	2.742E-05	1.517E-02

Emission Factor in lb/MMcf	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	Total - Metals
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	4.032E-06	8.871E-06	1.129E-05	3.064E-06	1.694E-05	4.419E-05
	Total HAPs					1.522E-02
	Worst HAP					1.452E-02

Methodology is the same as above.

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emission Calculations
Table B-3 - Natural Gas Combustion

Company Name: Ardagh Metal Packaging
Source Address: 4001 Montdale Park Drive, Valparaiso, Indiana 46383
Operating Permit No.: T 127-47698-00030
Reviewer: Daria Antipova

Emission Point	Description	% Sulfur	Design Rate (MMBtu/hr)	Heat Content (Btu/scf)	Fuel Use (scf/hr)	Hours (hr/yr)	Fuel Use (MMscf/year)
326 IAC 2-7-1, 21(J)(i)(AA)(aa)	Natural Gas Fired Heating Units (16 total)	N/A	0.25	1,020	245	8,760	2.1

	Criteria Pollutant Emission Factors ^(a)						HAP Emission Factors ^(b)			
	VOC (lb/MMscf)	PM (lb/MMscf)	PM ₁₀ (lb/MMscf)	PM _{2.5} (lb/MMscf)	SO ₂ (lb/MMscf)	NOx (lb/MMscf)	CO (lb/MMscf)	Hexane ^(c) (lb/MMscf)	Other HAPs ^(c) (lb/MMscf)	Total HAPs (lb/MMscf)
Natural Gas	5.5	1.9	7.6	7.6	0.6	100	84	1.8	0.089	1.89

	Estimated Potential to Emit ^(e) (lb/hr)									
	VOC	PM	PM ₁₀	PM _{2.5}	SO ₂	NOx	CO	Hexane ^(c)	Other HAPs ^(c)	Total HAPs
Natural Gas Fired Heating Units (16 total)	1.35E-03	4.66E-04	1.86E-03	1.86E-03	1.47E-04	0.02	0.02	4.41E-04	2.17E-05	4.63E-04
	1.35E-03	4.66E-04	1.86E-03	1.86E-03	1.47E-04	0.02	0.02	4.41E-04	2.17E-05	4.63E-04
	1.35E-03	4.66E-04	1.86E-03	1.86E-03	1.47E-04	0.02	0.02	4.41E-04	2.17E-05	4.63E-04
	1.35E-03	4.66E-04	1.86E-03	1.86E-03	1.47E-04	0.02	0.02	4.41E-04	2.17E-05	4.63E-04
	1.35E-03	4.66E-04	1.86E-03	1.86E-03	1.47E-04	0.02	0.02	4.41E-04	2.17E-05	4.63E-04
	1.35E-03	4.66E-04	1.86E-03	1.86E-03	1.47E-04	0.02	0.02	4.41E-04	2.17E-05	4.63E-04
	1.35E-03	4.66E-04	1.86E-03	1.86E-03	1.47E-04	0.02	0.02	4.41E-04	2.17E-05	4.63E-04
	1.35E-03	4.66E-04	1.86E-03	1.86E-03	1.47E-04	0.02	0.02	4.41E-04	2.17E-05	4.63E-04
	1.35E-03	4.66E-04	1.86E-03	1.86E-03	1.47E-04	0.02	0.02	4.41E-04	2.17E-05	4.63E-04
	1.35E-03	4.66E-04	1.86E-03	1.86E-03	1.47E-04	0.02	0.02	4.41E-04	2.17E-05	4.63E-04
	1.35E-03	4.66E-04	1.86E-03	1.86E-03	1.47E-04	0.02	0.02	4.41E-04	2.17E-05	4.63E-04
	1.35E-03	4.66E-04	1.86E-03	1.86E-03	1.47E-04	0.02	0.02	4.41E-04	2.17E-05	4.63E-04
	1.35E-03	4.66E-04	1.86E-03	1.86E-03	1.47E-04	0.02	0.02	4.41E-04	2.17E-05	4.63E-04
	1.35E-03	4.66E-04	1.86E-03	1.86E-03	1.47E-04	0.02	0.02	4.41E-04	2.17E-05	4.63E-04
	1.35E-03	4.66E-04	1.86E-03	1.86E-03	1.47E-04	0.02	0.02	4.41E-04	2.17E-05	4.63E-04
	Total	0.02	0.01	0.03	0.03	0.002	0.39	0.33	0.007	0.000

	Estimated Potential to Emit ^(e) (tons/year)									
	VOC	PM	PM ₁₀	PM _{2.5}	SO ₂	NOx	CO	Hexane ^(c)	Other HAPs ^(c)	Total HAPs
Natural Gas Fired Heating Units (16 total)	5.90E-03	2.04E-03	8.16E-03	8.16E-03	6.44E-04	0.11	0.09	1.93E-03	9.50E-05	2.03E-03
	5.90E-03	2.04E-03	8.16E-03	8.16E-03	6.44E-04	0.11	0.09	1.93E-03	9.50E-05	2.03E-03
	5.90E-03	2.04E-03	8.16E-03	8.16E-03	6.44E-04	0.11	0.09	1.93E-03	9.50E-05	2.03E-03
	5.90E-03	2.04E-03	8.16E-03	8.16E-03	6.44E-04	0.11	0.09	1.93E-03	9.50E-05	2.03E-03
	5.90E-03	2.04E-03	8.16E-03	8.16E-03	6.44E-04	0.11	0.09	1.93E-03	9.50E-05	2.03E-03
	5.90E-03	2.04E-03	8.16E-03	8.16E-03	6.44E-04	0.11	0.09	1.93E-03	9.50E-05	2.03E-03
	5.90E-03	2.04E-03	8.16E-03	8.16E-03	6.44E-04	0.11	0.09	1.93E-03	9.50E-05	2.03E-03
	5.90E-03	2.04E-03	8.16E-03	8.16E-03	6.44E-04	0.11	0.09	1.93E-03	9.50E-05	2.03E-03
	5.90E-03	2.04E-03	8.16E-03	8.16E-03	6.44E-04	0.11	0.09	1.93E-03	9.50E-05	2.03E-03
	5.90E-03	2.04E-03	8.16E-03	8.16E-03	6.44E-04	0.11	0.09	1.93E-03	9.50E-05	2.03E-03
	5.90E-03	2.04E-03	8.16E-03	8.16E-03	6.44E-04	0.11	0.09	1.93E-03	9.50E-05	2.03E-03
	5.90E-03	2.04E-03	8.16E-03	8.16E-03	6.44E-04	0.11	0.09	1.93E-03	9.50E-05	2.03E-03
	5.90E-03	2.04E-03	8.16E-03	8.16E-03	6.44E-04	0.11	0.09	1.93E-03	9.50E-05	2.03E-03
	5.90E-03	2.04E-03	8.16E-03	8.16E-03	6.44E-04	0.11	0.09	1.93E-03	9.50E-05	2.03E-03
	5.90E-03	2.04E-03	8.16E-03	8.16E-03	6.44E-04	0.11	0.09	1.93E-03	9.50E-05	2.03E-03
	Total	0.09	0.03	0.13	0.13	0.010	1.72	1.44	0.031	0.002

- Notes:
(a) Natural gas emission factors from AP-42, Chapter 1.4 (7/1998), Tables 1.4-1, 1.4-2, 1.4-3, and 1.4-4.
(b) HAP emission factors for fuel combustion are identified below.
(c) The individual HAP with the highest emission rate is listed individually. The other individual HAPs are grouped together as "Other HAPs".

Pollutant	Natural Gas Emission Factor (lbs/MMscf)	Pollutant	Natural Gas Emission Factor (lbs/MMscf)
Arsenic Compounds	0.0002	Lead Compounds	0.0005
Benzene (71432)	0.0021	Manganese Compounds	0.00038
Beryllium Compounds	0.000012	Mercury Compounds	0.00026
Cadmium Compounds	0.0011	Naphthalene (91203)	0.00061
Chromium Compounds	0.0014	Nickel Compounds	0.0021
Cobalt Compounds	0.000084	Polycyclic Organic Matter	0.0000882
Dichlorobenzene (106467)	0.0012	Selenium Compounds	0.000024
Formaldehyde (50000)	0.075	Toluene (108883)	0.0034
Hexane (110543)	1.8		
	Total HAPs		1.89

**Appendix A: Emission Calculations
Table B-4 - LPG and Propane Combustion**

Company Name: Ardagh Metal Packaging
Source Address: 4001 Montdale Park Drive, Valparaiso, Indiana 46383
Operating Permit No.: T 127-47698-00030
Reviewer: Daria Antipova

Heat Input Capacity
MMBtu/hr

kgals/year

SO2 Emission factor = 0.10 x S

S = Sulfur Content = 0.18 grains/100ft³ ***

6.00

574.43

Emission Factor in lb/kgal	Pollutant						
	PM*	PM10*	direct PM2.5**	SO2	NOx	VOC	CO
	0.2	0.7	0.7	0.02 (0.10S)	13.0	1.0 **TOC value	7.5
Potential Emission in tons/yr	0.06	0.20	0.20	0.01	3.73	0.29	2.15

*PM emission factor is filterable PM only. PM emissions are stated to be all less than 10 microns in aerodynamic equivalent diameter, footnote in Table

** No direct PM2.5 emission factor was given. Direct PM2.5 is a subset of PM10. If one assumes all PM10 to be all direct PM2.5, then a worst case assumption of direct PM2.5 can be made.

**The VOC value given is TOC. The methane emission factor is 0.2 lb/kgal.

***Sulfur Content assumed to be 0.18 grains per 100 cubic feet. (AP-42, Table 1.5-1 "Emission Factors for LPG Combustion"; subnote "e").

Methodology

1 gallon of LPG has a heating value of 94,000 Btu

1 gallon of propane has a heating value of 91,500 Btu (use this to convert emission factors to an energy basis for propane)

(Source - AP-42 (Supplement B 10/96) page 1.5-1)

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.0915 MMBtu

Emission Factors are from AP42 (7/08), Table 1.5-1 (SCC #1-02-010-02)

Propane Emission Factors shown. Please see AP-42 for butane.

Emission (tons/yr) = Throughput (kgals/yr) x Emission Factor (lb/kgal) / 2,000 lb/ton

**Appendix A: Emission Calculations
Table B-5 -North Cooling Tower**

Company Name: Ardagh Metal Packaging
Source Address: 4001 Montdale Park Drive, Valparaiso, Indiana 46383
Operating Permit No.: T 127-47698-00030
Reviewer: Daria Antipova

Basis^{(a),(b)}:

600 gal/min, water circulating rate
 8,760 hr/yr, annual operating rate
 2,050 mg/L, total dissolved solids (TDS)
 0.001 % Drift factor
 0.36 gal/hr, avg liquid drift rate (calculated from data above)

PM Emission Calculation:

2,050 mg/L, total dissolved solids (TDS)
 453,592 mg/lb, mass conversion
 3.7854 L/gal, liquid volume conversion
 0.017 lb/gal, TDS per gallon of drift
 0.006 avg lb/hr, PM emission rate

PM₁₀/PM_{2.5} Emission Calculations^(c):

Solid Particle Diameter (d_p) = $D_d(\text{TDS} * (\rho_w / \rho_{\text{TDS}}))^{1/3}$

ρ_w =	1 g/cm ³	d_d	= droplet diameter (microns)
ρ_{TDS} =	2.2 g/cm ³	d_p	= particle diameter (microns)
Average TDS =	2040 ppm	ρ_w	= density water
		ρ_{TDS}	= density tds

Droplet Diameter (D_d) ^(d)	Solid Particle Diameter (d_p) (Avg TDS)	% Drift Mass Smaller than ^(d)
10	0.98	12
15	1.46	20
35	3.41	40
65	6.34	60
115	11.21	80
170	16.58	90
230	22.43	95
375	36.57	99
525	51.20	99.8

TDS:

PM_{2.5} Interpolation

30.64 % of total PM

PM₁₀ Interpolation

75.02 % of total PM

Emissions Summary:

Pollutant	lb/hr	ton/yr
Particulate Matter (PM)	0.006	0.03
Particulate Matter (PM ₁₀)	0.005	0.02
Particulate Matter (PM _{2.5})	0.002	0.008

Notes:

- (a) Data provided by Mike Wells by email on 5/14/2019.
 (b) Emission factors from AP-42 Chapter 13.4.
 (c) PM₁₀ and PM_{2.5} emissions are estimated as a percent of total PM using methodology described in Calculating Realistic PM₁₀ Emissions from Cooling Towers by Joel Resiman and Gordon Frisbie and droplet size distribution data for a Marley drift eliminator.
 (d) Droplet diameter and % mass smaller columns are results of particle size distribution derived from test results provided by Marley.

Appendix A: Emission Calculations
Table B-6 -South Cooling Tower

Company Name: Ardagh Metal Packaging
Source Address: 4001 Montdale Park Drive, Valparaiso, Indiana 46383
Operating Permit No.: T 127-47698-00030
Reviewer: Daria Antipova

Basis^{(a),(b)}:

480 gal/min, water circulating rate
8,760 hr/yr, annual operating rate
2,050 mg/L, total dissolved solids (TDS)
0.002 % Drift factor
0.58 gal/hr, avg liquid drift rate (calculated from data above)

PM Emission Calculation:

2,050 mg/L, total dissolved solids (TDS)
453,592 mg/lb, mass conversion
3.7854 L/gal, liquid volume conversion
0.017 lb/gal, TDS per gallon of drift
0.01 avg lb/hr, PM emission rate

PM₁₀/PM_{2.5} Emission Calculations^(c):

$$\text{Solid Particle Diameter (d}_p\text{)} = D_d(\text{TDS} * (\rho_w / \rho_{\text{TDS}}))^{1/3}$$

$\rho_w =$	1 g/cm ³	d_d	= droplet diameter (microns)
$\rho_{\text{TDS}} =$	2.2 g/cm ³	d_p	= particle diameter (microns)
Average TDS =	2040 ppm	ρ_w	= density water
		ρ_{TDS}	= density tds

Droplet Diameter (D _d) ^(d)	Solid Particle Diameter (d _p) (Avg TDS)	% Drift Mass Smaller than ^(d)
10	0.98	12
15	1.46	20
35	3.41	40
65	6.34	60
115	11.21	80
170	16.58	90
230	22.43	95
375	36.57	99
525	51.20	99.8

TDS: _____

PM_{2.5} Interpolation

30.64 % of total PM

PM₁₀ Interpolation

75.02 % of total PM

Emissions Summary:

Pollutant	lb/hr	ton/yr
Particulate Matter (PM)	0.010	0.043
Particulate Matter (PM ₁₀)	0.007	0.033
Particulate Matter (PM _{2.5})	0.003	0.013

Notes:

- Data provided by Mike Wells by email on 5/14/2019.
- Emission factors from AP-42 Chapter 13.4.
- PM₁₀ and PM_{2.5} emissions are estimated as a percent of total PM using methodology described in Calculating Realistic PM₁₀ Emissions from Cooling Towers by Joel Resiman and Gordon Frisbie and droplet size distribution data for a Marley drift eliminator.
- Droplet diameter and % mass smaller columns are results of particle size distribution derived from test results provided by Marley.

Appendix A: Emission Calculations
Table 2 - PSD / Emission Offsets Analysis
Module #6 Modification (CP-63 Addition)

Company Name: Ardagh Metal Packaging
Source Address: 4001 Montdale Park Drive, Valparaiso, Indiana 46383
Operating Permit No.: T 127-47698-00030
Reviewer: Daria Antipova

Project Emissions Increase

Process / Emission Unit	NOx	VOC	PM
Baseline Actual Emissions			
Module #6 ^(a)	-	15.97	1.78
Potential Emissions			
Modified Module #6 ^(b)	-	29.60	3.30
Total Emissions Increase from Modification	-	13.64	1.52

Notes:

- (a) Module #6 commenced operation in September 2019. The unit was later authorized for modification under permit T127-41793-00030, issued January 3, 2020. Because 2 years of actual operating data are not available, Module #6 is categorized as a new emission unit as defined in 326 IAC 2-3-1(r)(1). Baseline actual emissions shall equal the unit's existing potential to emit, as specified in 326 IAC 2-3-1(d)(3). See estimates of existing potential to emit developed for permit T127-41793-0030 provided in Table 4.
- (b) Post-project potential emissions for the proposed modification reflecting addition of CP-63 are provided in Table 3.

Project Net Emissions Increase (De Minimis Test)

Calendar Year ^(a)	Project	Baseline Actual VOC (tpy)	Potential VOC Emissions (tpy)	Net VOC Emissions Change (tpy)
2016	-	-	-	-
2017	-	-	-	-
2018	-	-	-	-
2019	Module #6 can-end addition ^(b)	0	7.98	7.98
2020	Proposed Module #6 can-end Modification (CP-62) ^(c)	7.98	15.97	7.98
2020	Proposed Module #6 can-end Modification (CP-63) ^(d)	15.97	29.60	13.64
VOC Net Emission Increase				29.60
VOC Emission Limit				24.00
De Minimis Level				<25
Significant Level				25.00

Notes:

- (a) The 5 calendar year de minimis period from 1/1/2016 to 12/31/2020 is used.
- (b) Initial construction of Module #6 was authorized in Administrative Amendment 127-40718-00030 which IDEM issued December 17, 2018. See estimates of initial Module #6 potential to emit provided in Table 5. Baseline emissions are zero because the unit was newly constructed.
- (c) Modification of Module #6 (addition of CP-62), as authorized under permit T127-41793-00030, issued January 3, 2020. Because 2 years of actual operating data are not available, Module #6 is categorized as a new emission unit as defined in 326 IAC 2-3-1(r)(1). Baseline actual emissions shall equal the unit's potential to emit, as specified in 326 IAC 2-3-1(d)(3). See estimates of existing potential to emit for permit T127-41793-00030 provided in Table 4.
- (d) Proposed modification of Module #6 (addition of CP-63). Because 2 years of actual operating data are not available, Module #6 is categorized as a new emission unit as defined in 326 IAC 2-3-1(r)(1). Baseline actual emissions shall equal the unit's potential to emit, as specified in 326 IAC 2-3-1(d)(3). See post-project potential emissions for the proposed modification provided in Table 3.

Table 3 contains Trade Secret Information and is Public Record Claimed Exempt in part. Therefore, portions have been removed from this Public Copy of the application.

**Appendix A: Emission Calculations
Module # 6 - Unrestricted and Limited Potential Emissions with CP-63 Addition**

Company Name: Ardagh Metal Packaging
Source Address: 4001 Montdale Park Drive, Valparaiso, Indiana 46383
Operating Permit No.: T 127-47698-00030
Reviewer: Daria Antipova

Post Project Module #6 Emissions^(a)

Material	Density ^{(b),(c)} (lb/gal)	H ₂ O + Organics ^{(b),(c)} (wt %)	Water ^{(b),(c)} (wt %)	Organics ^{(b),(c)} (wt %)	Water ^{(b),(c)} (vol %)	Solids ^{(b),(c)} (vol %)	Mat. Use ^(d) (gal/1000 units)	Production Rate ^(e)			Material Usage ^(f)			VOC Content ^(c)		Unrestricted Potential Emissions ^(h)		Limited Potential Emissions ^(h)			
								Potential (unit/hr)	Potential (unit/yr)	Limited (unit/yr)	Potential (gal/hr)	Potential (gal/yr)	Limited (gal/yr)	Coating, less water (lb/gal)	(lb/gal)	PM ^(g)		VOC			
																(lb/hr)	(ton/yr)	(lb/hr)	(ton/yr)	(ton/yr)	(ton/yr)
Module #6 with Proposed Conversion Press CP-63 Addition																					
Can End Seal Compound - Water Based Material	10.3	34.0%	34.0%	0.0%	41.8%	58.0%					5.4	47,446	38,470	0	0	0.7	3.23	0	0	3.23	0
Tab Lube Lubricant (Tab is Part of the Can end)	6.35	88.6%	0.01%	88.6%	-	11.4%					1.2	10,525	8,534	-	5.63	0.02	0.08	6.76	29.60	0.08	24.00
Total for Module #6 (CP-61, CP-62, CP-63)															0.75	3.30	6.76	29.60	3.30	24.00	

Limited VOC in tab lube: 48,006 lb VOM/yr

Notes:

- (a) PTE reflecting proposed Module #6 operations with the addition of conversion press CP-63.
- (b) Can end seal compound property data as presented in the Technical Support Document (TSD) for Transition to a Part 70 Permit No. T127-41793-00030, January 3, 2020.
- (c) Tab lube lubricant property data as presented in the Technical Support Document (TSD) for Transition to a Part 70 Permit No. T127-41793-00030, January 3, 2020.
- (d) End Seal Compound usage factor taken from Technical Support Document (TSD) for Transition to a Part 70 Permit No. T127-41793-00030, January 3, 2020.
Tab Lube Lubricant usage factor taken from Technical Support Document (TSD) for Transition to a Part 70 Permit No. T127-41793-00030, January 3, 2020.
- (e) Production rates provided in 2/13/2020 e-mail from Matt Murphy of Ardagh. Hourly production rate reflects Module #6 design capacity after addition of CP-63. Annual potential production rate assumes continuous operation throughout the year. Limited annual production reflects the operating scenario that Ardagh is proposing to avoid Emission Offsets permitting requirements.
- (f) Material usage rates are determined by multiplying the material usage factor by each respective production rate.
- (g) It is conservatively assumed that potential emissions of PM₁₀ and PM_{2.5} will be equal to PM emissions.
- (h) Sample calculations:

$$\text{Potential PM/PM}_{10}/\text{PM}_{2.5} \text{ [lb/hr]} = \text{Density [lb/gal]} \times [1-\%H_2O, \text{organics}] \times \text{Usage Factor [gal/1,000 unit]} \times \text{Production [units/hr]} \times [1-98\% \text{ transfer eff.}]$$

$$\text{Potential PM/PM}_{10}/\text{PM}_{2.5} \text{ [ton/yr]} = \text{Density [lb/gal]} \times [1-\%H_2O, \text{organics}] \times \text{Usage Factor [gal/1,000 unit]} \times \text{Production [units/hr]} \times [1-98\% \text{ transfer eff.}] \times 8,760 \text{ [hr/yr]} \times 1 \text{ ton /2,000 lb}$$

$$\text{Limited PM/PM}_{10}/\text{PM}_{2.5} \text{ [ton/yr]} = \text{Density [lb/gal]} \times [1-\%H_2O, \text{organics}] \times \text{Usage Factor [gal/1,000 unit]} \times \text{Limited Production [units/yr]} \times [1-98\% \text{ transfer eff.}] \times 1 \text{ ton /2,000 lb}$$
 Lube application via drip and felt pad (direct transfer) -- minimal airborne expression. Transfer efficiency = 98%.

$$\text{Potential VOC [lb/hr]} = \text{VOC Content [lb/gal]} \times \text{Usage Factor [gal/1,000 unit]} \times \text{Production [units/hr]}$$

$$\text{Potential VOC [ton/yr]} = \text{VOC Content [lb/gal]} \times \text{Usage Factor [gal/1,000 unit]} \times \text{Production [units/hr]} \times 8,760 \text{ [hr/yr]} \times 1 \text{ ton /2,000 lb}$$

$$\text{Limited VOC [ton/yr]} = \text{VOC Content [lb/gal]} \times \text{Usage Factor [gal/1,000 unit]} \times \text{Limited Production [units/yr]} \times 1 \text{ ton /2,000 lb}$$

Appendix A: Emission Calculations

Module # 6 - Unrestricted and Limited Potential Emissions with CP-62 Addition

Company Name: Ardagh Metal Packaging
 Source Address: 4001 Montdale Park Drive, Valparaiso, Indiana 46383
 Operating Permit No.: T 127-47698-00030
 Reviewer: Daria Antipova

Table 4 contains Trade Secret Information and is Public Record Claimed Exempt in part. Therefore, portions have been removed from this Public Copy of the application.

Post Project Module #6 Emissions^(a)

Material	Density ^{(b),(c)} (lb/gal)	H ₂ O + Organics ^{(b),(c)} (wt %)	Water ^{(b),(c)} (wt %)	Organics ^{(b),(c)} (wt %)	Water ^{(b),(c)} (vol %)	Solids ^{(b),(c)} (vol %)	Mat. Use ^(d) (gal/1000 units)	Production Rate ^(e)		Material Usage ^(f)		VOC Content ^(c)		Unrestricted Potential Emissions ^(h)			
								Potential (unit/hr)	Potential (unit/yr)	Potential (gal/hr)	Potential (gal/yr)	Coating, less water (lb/gal)	(lb/gal)	PM ^(g)		VOC	
														(lb/hr)	(ton/yr)	(lb/hr)	(ton/yr)
Module #6 with Conversion Press CP-62 Addition																	
Can End Seal Compound - Water Based Material	10.3	34.0%	34.0%	0.0%	41.8%	58.0%				2.9	25,646	0	0	0.4	1.74	0	0
Tab Lube Lubricant (Tab is Part of the Can end)	6.35	88.6%	0.01%	88.6%	-	11.4%				0.6	5,676	-	5.63	0.01	0.04	3.65	15.97
Total for Module #6 (CP-61 & CP-62)														0.41	1.78	3.65	15.97

Notes:

- (a) PTE reflecting proposed Module #6 operations with the addition of conversion press CP-62, as authorized in Transition to a Part 70 Permit No. T127-41793-00030, January 3, 2020.
- (b) Can end seal compound property data as presented in the Technical Support Document (TSD) for Transition to a Part 70 Permit No. T127-41793-00030, January 3, 2020.
- (c) Tab lube lubricant property data as presented in the Technical Support Document (TSD) for Transition to a Part 70 Permit No. T127-41793-00030, January 3, 2020.
- (d) End Seal Compound usage factor taken from Technical Support Document (TSD) for Transition to a Part 70 Permit No. T127-41793-00030, January 3, 2020.
Tab Lube Lubricant usage factor taken from Technical Support Document (TSD) for Transition to a Part 70 Permit No. T127-41793-00030, January 3, 2020.
- (e) Production rates provided in 2/13/2020 e-mail from Matt Murphy of Ardagh. Hourly production rate reflects Module #6 design capacity after addition of CP-62. Annual potential production rate assumes continuous operation throughout the year.
- (f) Material usage rates are determined by multiplying the material usage factor by each respective production rate.
- (g) It is conservatively assumed that potential emissions of PM₁₀ and PM_{2.5} will be equal to PM emissions.
- (h) Sample calculations:
 Potential PM/PM₁₀/PM_{2.5} [lb/hr] = Density [lb/gal] x [1-%H₂O,organics] x Usage Factor [gal/1,000 unit] x Production [units/hr] x [1-98% transfer eff.]
 Potential PM/PM₁₀/PM_{2.5} [ton/yr] = Density [lb/gal] x [1-%H₂O,organics] x Usage Factor [gal/1,000 unit] x Production [units/hr] x [1-98% transfer eff.] x 8,760 [hr/yr] x 1 ton /2,000 lb
 Lube application via drip and felt pad (direct transfer) -- minimal airborne expression. Transfer efficiency = 98%.
 Potential VOC [lb/hr] = VOC Content [lb/gal] x Usage Factor [gal/1,000 unit] x Production [units/hr]
 Potential VOC [ton/yr] = VOC Content [lb/gal] x Usage Factor [gal/1,000 unit] x Production [units/hr] x 8,760 [hr/yr] x 1 ton /2,000 lb

**Appendix A: Emission Calculations
Fugitive Dust Emissions - Paved Roads**

**Company Name: Ardagh Metal Packaging
Source Address: 4001 Montdale Park Drive, Valparaiso, Indiana 46383
Operating Permit No.: T 127-47698-00030
Reviewer: Daria Antipova**

Paved Roads at Industrial Site

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

Vehicle Information (provided by source)

Type	Maximum number of vehicles per day	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight of Loaded Vehicle (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Semi (entering plant) (Shipping)	23.0	1.0	23.0	18.0	414.0	355	0.067	1.5	564.4
Semi (leaving plant)	23.0	1.0	23.0	38.0	874.0	355	0.067	1.5	564.4
Semi (entering plant) (Receiving)	2.0	1.0	2.0	53.0	106.0	355	0.067	0.1	49.1
Semi (leaving plant)	2.0	1.0	2.0	17.0	34.0	355	0.067	0.1	49.1
Generic (Mail Delivery)	7.0	1.0	7.0	4.0	28.0	355	0.067	0.5	171.8
Employee Vehicles	60.0	1.0	60.0	3.0	180.0	501	0.095	5.7	2078.0
Totals			117.0		1636.0			9.5	3476.8

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

Unmitigated Emission Factor, Ef = $[k * (sL)^{0.91} * (W)^{1.02}]$ (Equation 1 from AP-42 13.2.1)

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	14.0	14.0	14.0	tons = average vehicle weight
sL =	9.7	9.7	9.7	g/m ² = silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = $E * [1 - (p/4N)]$ (Equation 2 from AP-42 13.2.1)

Mitigated Emission Factor, Eext = $Ef * [1 - (p/4N)]$
where p = days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
N = days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	1.282	0.256	0.0629	lb/mile
Mitigated Emission Factor, Eext =	1.172	0.234	0.0575	lb/mile

Process	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)
Semi (entering plant) (Shipping)	0.33	0.07	0.02
Semi (leaving plant)	0.33	0.07	0.02
Semi (entering plant) (Receiving)	0.03	0.01	0.00
Semi (leaving plant)	0.03	0.01	0.00
Generic (Mail Delivery)	0.10	0.02	0.00
Employee Vehicle	1.22	0.24	0.06
Totals	2.04	0.41	0.10

Methodology

Total Weight driven per day (ton/day) = [Maximum Weight of Loaded Vehicle (tons/trip)] * [Maximum trips per day (trip/day)]
Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]
Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] * [Maximum one-way distance (mi/trip)]
Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]
Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]
Mitigated PTE (Before Control) (tons/yr) = [Maximum one-way miles (miles/yr)] * [Mitigated Emission Factor (lb/mile)] * (ton/2000 lbs)
Mitigated PTE (After Control) (tons/yr) = [Mitigated PTE (Before Control) (tons/yr)] * [1 - Dust Control Efficiency]

Abbreviations

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



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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Eric J. Holcomb
Governor

DRAFT

Brian C. Rockensuess
Commissioner

Part 70 Operating Permit Renewal OFFICE OF AIR QUALITY

**Ardagh Metal Packaging
4001 Montdale Park Drive,
Valparaiso, Indiana 46383**

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

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

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

Operation Permit No.: T 127-47698-00030	
Master Agency Interest ID: 12595	
Issued by:	Issuance Date:
Josiah K. Balogun, Section Chief Permits Branch Office of Air Quality	Expiration Date:

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.4 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

The Permittee owns and operates a stationary can end manufacturing plant.

Source Address:	4001 Montdale Park Drive, Valparaiso, Indiana 46383
General Source Phone Number:	(219) 462-4843
SIC Code:	3411 (Metal Cans)
County Location:	Porter (Washington Township)
Source Location Status:	Nonattainment for 8-hour ozone standard Attainment for all other criteria pollutants
Source Status:	Part 70 Operating Permit Program Major Source, under Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) One (1) can end manufacturing line, constructed in 1989, identified as Module #1, consisting of one (1) shell blanking press, four (4) HSL-8 lid liners, tab lube application, and four (4) conversion presses, with a maximum capacity of 520,000 ends per hour, with no controls, exhausting to the atmosphere.
- (b) One (1) can end manufacturing line, constructed in 1989, identified as Module #2, consisting of one (1) shell blanking press, four (4) HSL-8 lid liners, tab lube application, and three (3) conversion presses, with a maximum capacity of 450,000 ends per hour, with no controls, exhausting to the atmosphere.
- (c) One (1) can end manufacturing line, constructed in 1989, identified as Module #3, consisting of one (1) shell blanking press, four (4) HSL-8 lid liners, tab lube application, and three (3) conversion presses, with a maximum capacity of 450,000 ends per hour, with no controls, exhausting to the atmosphere.
- (d) One (1) can end manufacturing line, constructed in 1989, identified as Module #4, consisting of one (1) shell blanking press, four (4) HSL-8 lid liners, tab lube application, and three (3) conversion presses, with a maximum capacity of 450,000 ends per hour, with no controls, exhausting to the atmosphere.
- (e) One (1) can end manufacturing line, constructed in 2000, and modified in 2024, identified as Module #5, consisting of one (1) three lane conversion press, one (1) compound liner, tab lube application, and one (1) six out shell press, with a maximum capacity of 180,000 ends per hour, with no controls, and exhausting to the atmosphere.
- (f) One (1) can end manufacturing line, identified as Module #6, constructed in 2018, consisting of one (1) shell blanking press, eight (8) curlers, identified as #1-#8; two (2) lid

liners; tab lube application; one (1) conversion press, identified as CP-61, with a maximum capacity of 180,000 ends per hour; approved in 2019 for modification to add one (1) conversion press, identified as CP-62, with a maximum capacity of 180,000 ends per hour; and approved in 2020 for modification to add one (1) conversion press, identified as CP-63, with a maximum capacity of 306,000 ends per hour, with no controls, exhausting to the atmosphere.

A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(14)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
 - (1) One (1) natural gas-fired air make-up unit rated at 1,878,000 Btu/hr; and
 - (2) Sixteen (16) natural gas-fired direct heating units, each rated at 250,000 Btu/hr.
- (b) Propane or liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than six (6) million Btu per hour.
- (c) Vessels storing lubricating oils (including tab lube), hydraulic oils, machining oils and machining fluids.
- (d) Particulate emissions from recycled trim material recovery.
- (e) South Cooling Tower; induced draft, 480 gal/min.
- (f) North Cooling Tower; induced draft, 600 gal/min.
- (g) Blowdown from sight glasses, boilers, cooling towers, compressors, and pumps.
- (h) Paved roads and parking lots [326 IAC 6-4].

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

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

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

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

B.2 Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)][IC 13-15-3-6(a)]

- (a) This permit, T 127-47698-00030, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

B.3 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability [326 IAC 2-7-7] [IC 13-17-12]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

- (a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:
- (1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(35), and
 - (2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) A "responsible official" is defined at 326 IAC 2-7-1(35).

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

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 of each year to:

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

and

United States Environmental Protection Agency, Region 5
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

- (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

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

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

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

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

The Permittee shall implement the PMPs.

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

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

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

The Permittee shall implement the PMPs.

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance

causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.

- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ or Northwest Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)
Facsimile Number: 317-233-6865
Northwest Regional Office phone: (219) 464-0233; fax: (219) 464-0553.

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

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

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;

- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(8) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

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

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

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

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable

requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]

- (a) All terms and conditions of permits established prior to T 127-47698-00030 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

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

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

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

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

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

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

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the

document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

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

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

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

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

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

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

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

- (a) No Part 70 permit revision or notice shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

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

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b) or (c) without a prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

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

(4) The Permittee notifies the:

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

and

United States Environmental Protection Agency, Region 5
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

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

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

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

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

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

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

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

- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.20 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2.

B.21 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-8590 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

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

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

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

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

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

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(c).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(d).

All required notifications shall be submitted to:

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

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

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Licensed Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

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

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

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

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

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

- (a) For new units:
Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units shall be implemented on and after the date of initial start-up.
- (b) For existing units:
Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance to begin such monitoring. If, due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

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

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

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale. The analog instrument shall be capable of measuring values outside of the normal range.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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

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

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

- (a) The Permittee shall maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

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

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

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

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

- (a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system);
or

- (3) any necessary follow-up actions to return operation to normal or usual manner of operation.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; and/or
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall record the reasonable response steps taken.

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

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

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

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

- (a) Pursuant to 326 IAC 2-6-3(a)(1) and 326 IAC 2-6-3(b)(1), the Permittee shall submit by July 1 an emission statement covering the previous calendar year as follows:
 - (1) starting in 2004 and every three (3) years thereafter, and
 - (2) any year not already required under (1) if the source emits volatile organic compounds or oxides of nitrogen into the ambient air at levels equal to or greater than twenty-five (25) tons during the previous calendar year.
- (b) The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
 - (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);

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

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
MC 61-50 IGCN 1003
Indianapolis, Indiana 46204-2251

The emission statement does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

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

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

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

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

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

- (b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.
- (c) If there is a reasonable possibility (as defined in 326 IAC 2-2-8 (b)(6)(A), 326 IAC 2-2-8 (b)(6)(B), 326 IAC 2-3-2 (l)(6)(A), and/or 326 IAC 2-3-2 (l)(6)(B)) that a "project" (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(dd) and/or 326 IAC 2-3-1(y)) may result in significant emissions increase and the Permittee elects to utilize the "projected

actual emissions” (as defined in 326 IAC 2-2-1(pp) and/or 326 IAC 2-3-1(kk)), the Permittee shall comply with following:

- (1) Before beginning actual construction of the “project” (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, document and maintain the following records:
 - (A) A description of the project.
 - (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
 - (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
 - (i) Baseline actual emissions;
 - (ii) Projected actual emissions;
 - (iii) Amount of emissions excluded under section 326 IAC 2-2-1(pp)(2)(A)(iii) and/or 326 IAC 2-3-1 (kk)(2)(A)(iii); and
 - (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.
- (d) If there is a reasonable possibility (as defined in 326 IAC 2-2-8 (b)(6)(A) and/or 326 IAC 2-3-2 (l)(6)(A)) that a “project” (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a “major modification” (as defined in 326 IAC 2-2-1(dd) and/or 326 IAC 2-3-1(y)) may result in significant emissions increase and the Permittee elects to utilize the “projected actual emissions” (as defined in 326 IAC 2-2-1(pp) and/or 326 IAC 2-3-1(kk)), the Permittee shall comply with following:
 - (1) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and
 - (2) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

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

-
- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B - Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring

Report shall include a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

- (b) The address for report submittal is:
- Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.
- (e) If the Permittee is required to comply with the recordkeeping provisions of (d) in Section C - General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1 (oo) and/or 326 IAC 2-3-1 (jj)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:
- (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (ww) and/or 326 IAC 2-3-1 (pp), for that regulated NSR pollutant, and
 - (2) The emissions differ from the preconstruction projection as documented and maintained under Section C - General Record Keeping Requirements (c)(1)(C)(ii).
- (f) The report for project at an existing emissions *unit* shall be submitted no later than sixty (60) days after the end of the year and contain the following:
- (1) The name, address, and telephone number of the major stationary source.
 - (2) The annual emissions calculated in accordance with (d)(1) and (2) in Section C - General Record Keeping Requirements.
 - (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).
 - (4) Any other information that the Permittee wishes to include in this report such as an explanation as to why the emissions differ from the preconstruction projection.

Reports required in this part shall be submitted to:

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

- (g) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

Stratospheric Ozone Protection

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

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) can end manufacturing line, constructed in 1989, identified as Module #1, consisting of one (1) shell blanking press, four (4) HSL-8 lid liners, tab lube application, and four (4) conversion presses, with a maximum capacity of 520,000 ends per hour, with no controls, exhausting to the atmosphere.
- (b) One (1) can end manufacturing line, constructed in 1989, identified as Module #2, consisting of one (1) shell blanking press, four (4) HSL-8 lid liners, tab lube application, and three (3) conversion presses, with a maximum capacity of 450,000 ends per hour, with no controls, exhausting to the atmosphere.
- (c) One (1) can end manufacturing line, constructed in 1989, identified as Module #3, consisting of one (1) shell blanking press, four (4) HSL-8 lid liners, tab lube application, and three (3) conversion presses, with a maximum capacity of 450,000 ends per hour, with no controls, exhausting to the atmosphere.
- (d) One (1) can end manufacturing line, constructed in 1989, identified as Module #4, consisting of one (1) shell blanking press, four (4) HSL-8 lid liners, tab lube application, and three (3) conversion presses, with a maximum capacity of 450,000 ends per hour, with no controls, exhausting to the atmosphere.
- (e) One (1) can end manufacturing line, constructed in 2000, and modified in 2024, identified as Module #5, consisting of one (1) three lane conversion press, one (1) compound liner, tab lube application, and one (1) six out shell press, with a maximum capacity of 180,000 ends per hour, with no controls, and exhausting to the atmosphere.
- (f) One (1) can end manufacturing line, identified as Module #6, constructed in 2018, consisting of one (1) shell blanking press, eight (8) curlers, identified as #1-#8; two (2) lid liners; tab lube application; one (1) conversion press, identified as CP-61, with a maximum capacity of 180,000 ends per hour; approved in 2019 for modification to add one (1) conversion press, identified as CP-62, with a maximum capacity of 180,000 ends per hour; and approved in 2020 for modification to add one (1) conversion press, identified as CP-63, with a maximum capacity of 306,000 ends per hour, with no controls, exhausting to the atmosphere.

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

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

D.1.1 Emission Offset Minor Limit [326 IAC 2-3]

Pursuant to Permit No. T127-32478-00030, issued on July 26, 2013, and in order to render the requirements of 326 IAC 2-3 (Emission Offset) not applicable, the Permittee shall comply with the following:

The total amount of VOC usage from the five (5) can end manufacturing, identified as Modules #1 through Module #5, shall not exceed 80.8 tons of VOC per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this limit shall limit the VOC emissions from the modification of Module #1 through Module #5 to less than one hundred (100) tons per twelve (12) consecutive month and

shall render the requirements 326 IAC 2-3 (Emission Offset) not applicable to the 2013 modification.

D.1.2 Emission Offset Minor Limit and VOC BACT Minor Limit [326 IAC 2-3] [326 IAC 8-1-6]

Pursuant to SSM No. 127-42738-00030, issued on June 12, 2020, and in order to render the requirements of 326 IAC 2-3 (Emission Offset) and 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) not applicable, the Permittee shall comply with the following:

The total amount of VOC usage from the can end manufacturing line, identified as Module #6, shall not exceed twenty-four (24) tons of VOC per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this limit shall limit the VOC emissions from Module #6 to the De Minimis level of less than twenty-five (25) tons per twelve (12) consecutive month and shall render the requirements of 326 IAC 2-3 (Emission Offset) and 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) not applicable to Modules #6.

D.1.3 Can Coating Operations (VOC) [326 IAC 8-2-3]

Pursuant to 326 IAC 8-2-3(b)(4) (Can Coating Operations), the emissions from the beverage can coating operations shall not discharge volatile organic compounds in excess of the following:

Coating	lbs VOC per gallon excluding water
End Seal Coating	3.7

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

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

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

D.1.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-4(a)(3)][326 IAC 8-1-2(a)]

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

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

D.1.6 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limit established in Condition D.1.1.

Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

- (1) The combined total amount of coating material and solvent used on a monthly basis in Module #1 through Module #5.
- (A) Records shall include purchase orders, invoices, and safety data sheets (SDS) necessary to verify the type and amount used.

- (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (2) The cleanup solvent usage for each month in Module #1 through Module #5; and
 - (3) The total combined VOC usage for each month in Module #1 through Module #5.
- (b) To document the compliance status with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limit established in Condition D.1.2.

Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

- (1) The total amount of coating material and solvent used on a monthly basis in Module #6.
 - (A) Records shall include purchase orders, invoices, and safety data sheets (SDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (2) The cleanup solvent usage for each month in Module #6; and
 - (3) The total combined VOC usage for each month in Module #6.
- (c) To document the compliance status with Condition D.1.3, the Permittee shall maintain records of the following. Records maintained shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limit established in Condition D.1.3.

Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

- (1) The VOC content of each coating material and solvent used less water at Module #1 through Module #6.
 - (A) Records shall include safety data sheets (SDS) or VOC data sheets necessary to verify the type, density, % VOC content and % water content of material used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
- (b) Section C - General Record Keeping Requirements, of this permit contains the Permittee's obligations with regard to the records required by this condition.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Insignificant Activities:

- (d) Particulate emissions from recycled trim material recovery.

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

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

D.2.1 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e) (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the recycled trim material recovery equipment shall not exceed five hundred fifty-one thousandths (0.551) pounds per hour when operating at a process weight rate of less than one hundred (100) pounds per hour.

D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Ardagh Metal Packaging
Source Address: 4001 Montdale Park Drive, Valparaiso, Indiana 46383
Part 70 Permit No.: T 127-47698-00030

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: (317) 233-0178
Fax: (317) 233-6865**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Ardagh Metal Packaging
Source Address: 4001 Montdale Park Drive, Valparaiso, Indiana 46383
Part 70 Permit No.: T 127-47698-00030

This form consists of 2 pages

Page 1 of 2

- This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) daytime business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
 - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.

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

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

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

Page 2 of 2

Date/Time Emergency started:		
Date/Time Emergency was corrected:		
Was the facility being properly operated at the time of the emergency?	Y	N
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:		
Estimated amount of pollutant(s) emitted during emergency:		
Describe the steps taken to mitigate the problem:		
Describe the corrective actions/response steps taken:		
Describe the measures taken to minimize emissions:		
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:		

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH**

Part 70 Quarterly Report

Source Name: Ardagh Metal Packaging
Source Address: 4001 Montdale Park Drive, Valparaiso, Indiana 46383
Part 70 Permit No.: T 127-47698-00030
Facility: Can end manufacturing lines, identified as Module #1 through Module #5
Parameter: VOC usage
Limit: Combined total amount of VOC usage shall not exceed 80.8 tons of VOC per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER: _____

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	VOC usage (tons)	VOC usage (tons)	VOC usage (tons)
	This Month	Previous 11 Months	12 Month Total

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH**

Part 70 Quarterly Report

Source Name: Ardagh Metal Packaging
Source Address: 4001 Montdale Park Drive, Valparaiso, Indiana 46383
Part 70 Permit No.: T 127-47698-00030
Facility: Can end manufacturing line, identified as Module #6
Parameter: VOC usage
Limit: The total amount of VOC usage shall not exceed 24.0 tons of VOC per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER: _____

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	VOC usage (tons)	VOC usage (tons)	VOC usage (tons)
	This Month	Previous 11 Months	12 Month Total

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Ardagh Metal Packaging
Source Address: 4001 Montdale Park Drive, Valparaiso, Indiana 46383
Part 70 Permit No.: T 127-47698-00030

Months: _____ to _____ Year: _____

Page 1 of 2

<p>This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B - Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C- General Reporting. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

From: [Antipova, Daria](#)
To: [Sorvillo, Tracie](#); [Grayson, Michael](#); [Murphy, Matthew](#)
Subject: RE: Applicant Review for TV/Renewal No. T 127-47698-00030 for Ardagh Metal Packaging
Date: Wednesday, June 26, 2024 2:25:00 PM
Attachments: [image001.png](#)
[image011.png](#)
[image012.png](#)
[image013.png](#)
[image014.png](#)
[image015.png](#)
[image016.png](#)
[image017.png](#)

Good afternoon, Tracie,

We appreciate the comments, the corrections will be made to the draft and all the documents will be forwarded for public notice.

As per new responsible official (RO) at the source:

IDEM does not change the RO name until the position change has been completed. If the RO position change has occurred, then an application cover sheet form, signed by the new RO is required, and that name must match the RO named in GSD-01 Part D and/or the cover letter.

You will need to mail hard copy of the documents indicating new RO (with wet signature) to IDEM. Please mark it with "Additional Information to 127-47698-00030".

Thank you,

Sincerely,



Daria Antipova,
IDEM, OAQ
Permits Branch
(317) 234-3429



Please consider the environment before printing this email.

From: Sorvillo, Tracie <Tracie.Sorvillo@ardaghgroup.com>
Sent: Wednesday, June 26, 2024 1:49 PM
To: Antipova, Daria <DAntipov@idem.IN.gov>; Grayson, Michael <Michael.Grayson@ardaghgroup.com>; Murphy, Matthew <Matthew.Murphy@ardaghgroup.com>
Subject: RE: Applicant Review for TV/Renewal No. T 127-47698-00030 for Ardagh Metal Packaging

**** This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. ****

Hi Daria,

The new permit has been reviewed and the language for Mod #5 needs changed on the TSD and the draft permit. I have attached copies of the TSD and draft permit where I highlighted the incorrect language (yellow) and inserted the correct language (green). In the permit it's pg 4 Section A.2 (e) and pg 26 Section D.1 (e). These sections and the TSD will need to be corrected. Everything else looks good.

We also have a new plant manager for the site, and I have attached Matt Murphy to this email string. Is there a website or a certain way I should change the Responsible Official for the facility?

Thank you,
Tracie Sorvillo

From: Antipova, Daria <DAntipov@idem.IN.gov>
Sent: Thursday, June 13, 2024 2:14 PM
To: Sorvillo, Tracie <Tracie.Sorvillo@ardaghgroup.com>; Grayson, Michael <Michael.Grayson@ardaghgroup.com>
Subject: Applicant Review for TV/Renewal No. T 127-47698-00030 for Ardagh Metal Packaging
Importance: High

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Dear Michael Grayson, Tracie Sorvillo:

Attached is the draft TV/Renewal and supporting documents for review. As a courtesy, this draft is being provided to you for an opportunity to review and provide comments prior to posting the public notice on IDEM's website. This supplemental step of providing you the draft permit does not take away your legal right to provide comments during the thirty (30) day comment period.

The time clock for TV/Renewal No.: T 127-47698-00030 will be stopped during your review until you either provide comments or indicate that you do not have any comments. Due to permit accountability and IDEM's intention to public notice the permit in a timely manner, you are being allotted *two (2) weeks* from today to provide comments in writing, email is sufficient. If you have any conflicts or special circumstances that would impede your review process during the time allotted, please notify me directly at the email address or phone number listed below as soon as possible. If you have not responded on or before *June 28, 2024*, IDEM will assume that you have no comments pertaining to this draft and all files will be forwarded for public notice.

During this review period, I will be available to address your concerns, answer any questions that you may have, or make necessary revisions to this draft.

Please send a reply email to me immediately confirming that you have received this draft version of the permit for review and that you are able to access these files in their current format.

Pursuant to 326 IAC 2-1.1-7, the fee for this permitting action is expected to be \$0.

Please note: This is not a bill. This represents the anticipated fee and is subject to change if additional review is required or the permit level changes for some reason (e.g. an additional NESHAP review is required). You will receive a final bill from the OAQ Permits Administration and Support Section.

Sincerely,



Daria Antipova, Environmental Engineer

Permits Branch • Office of Air Quality

(317) 234-3429 • DAntipov@idem.IN.gov

[Indiana Department of Environmental Management](http://www.in.gov/indem)



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