

TECHNICAL REVIEW DOCUMENT OPERATING PERMIT 95OPJE111

to be issued to:

Ball Metal Beverage Container Corp.
Jefferson County
Source ID 0590010

Prepared by Geoffrey D. Drissel
June 23, 2006

I. Purpose:

This document will establish the basis for decisions made regarding the applicable requirements, emission factors, monitoring plan and compliance status of emission units covered by the renewal operating permit proposed for this site. The original Operating Permit was issued April 1, 2003. This document is designed for reference during the review of the proposed permit by the EPA, the public, and other interested parties. The conclusions made in this report are based on information provided in the modification application submitted February 2, 2006, previous inspection reports and various e-mail correspondence, as well as telephone conversations with the applicant. Please note that copies of the Technical Review Document for the original permit and any Technical Review Documents associated with subsequent modifications of the original Operating Permit may be found in the Division files as well as on the Division website at <http://www.cdphe.state.co.us/ap/Titlev.html>.

Any revisions made to the underlying construction permits associated with this facility made in conjunction with the processing of this operating permit application have been reviewed in accordance with the requirements of Regulation No. 3, Part B, Construction Permits, and have been found to meet all applicable substantive and procedural requirements. This operating permit incorporates and shall be considered to be a combined construction/operating permit for any such revision, and the permittee shall be allowed to operate under the revised conditions upon issuance of this operating permit without applying for a revision to this permit or for an additional or revised Construction Permit.

II. Source Description:

The Ball Metal Beverage Container Corp. facility produces aluminum cans and ends from continuous aluminum sheets and aluminum end stock. The facility currently operates three can lines and four end lines. The major processing steps consist of cup extrusion, can forming, can washing and drying, ink and overvarnish application and curing, internal coating and curing, and can end manufacture and attachment. The plant equipment includes cuppers, trimmers, washers, coating application equipment, ovens and boilers.

The facility is located in Golden, west of Denver, in Jefferson County. The plant is located within 100 kilometers of Rocky Mountain National Park and Eagle's Nest National Wilderness Area. There are no affected states located within a 50 mile radius of the Site.

The area in which the plant operates is classified as attainment/maintenance for particulate matter less than 10 microns (PM₁₀), ozone and carbon monoxide. Under that classification, all SIP-approved requirements for PM₁₀, VOC and CO will continue to apply in order to prevent backsliding under the provisions of Section 110(l) of the Federal Clean Air Act.

The source is currently considered to be a minor source for purposes of Prevention of Significant Deterioration (PSD) regulations (Potential to Emit < 250 tpy) as defined in Colorado Regulation No. 3, Part A, Section I.B.58. Facility-wide potential and actual emissions are as follows:

<u>Pollutant</u>	<u>Potential to Emit (tpy)</u>	<u>Actual 2004 Emissions (tpy)</u>
NOx	15.0	7.7
VOC (manufacturing)	147.7	58.3
VOC (clean up)	25.0	10.3
CO	12.6	6.5
PM ₁₀	36.8	1.5
Particulate	36.8	1.5

Potential emissions are taken from the current Operating Permit for this facility. Actual emissions are taken from a report of a facility inspection conducted on December 16, 2004.

The applicant certified that the facility was in compliance with all applicable requirements at the time of application submittal. The applicant also indicated that the facility is not subject to 112(r), the Accidental Release Prevention Program of the Federal Clean Air Act.

III. Emission Sources:

Source Requested Modifications

The source requested that the following changes be made to the Operating Permit:

- addition of a provision limiting the emission of HAPs to less than 10

tons of any single HAP and less than 25 tons for all HAPs

- a statement that operation of the RTO may be discontinued during a natural gas curtailment as long as the facility will be in continuous compliance with all emission limits.
- a revision of the equipment description for emission unit P007.

Other Modifications

In addition to the changes requested by the source, the Division has included changes to make the permit more consistent with recently issued permits, including comments made by EPA on other Operating Permits, as well as to correct errors or omissions identified during review of this renewal.

The Division has made the following revisions, based on recent internal permit processing decisions and EPA comments, to this Operating Permit. These changes are as follows:

- General Condition 21 was revised to reflect the current version.
- Appendix B and C were revised to reflect the current versions.

IV. Insignificant Activities

Several insignificant activities were listed by the applicant as an addendum to form 102B. These activities included laboratories, research and development activities, certain fuel-burning equipment, chemical storage tanks and areas, diesel fuel and fuel oil storage tanks, landscaping equipment, hydrocarbon storage vessels, lubricating oil storage tanks and surface area disturbance activities.

V. Alternative Operating Scenarios

There are no alternative operating scenarios associated with this facility.

VI. Permit Shield

The permit shield has been requested for several items for this facility. The Operating Permit contains a detailed listing of the shield items granted. The

shield, however, does not protect the source from any violations that occurred prior to or at the time of permit issuance. In addition, the shield does not protect the source from any violations that occur as a result of any modifications or reconstruction on which construction commenced prior to permit issuance.

VII. Accidental Release Program - 112(r)

Section 112(r) of the Clean Air Act mandates a new federal focus on the prevention of chemical accidents. Sources subject to these provisions must develop and implement risk management programs that include hazard assessment, a prevention program, and an emergency response program. They must prepare and implement a Risk Management Plan (RMP) as specified in the Rule.

Ball Metal Beverage Container Corp., in the resubmitted Operating Permit application of 12/01, indicated that this facility is not subject to the provisions of the Accidental Release Prevention Program (Section 112(r) of the Federal Clean Air Act).