

CERTIFICATION OF REPORTS BY A RESPONSIBLE OFFICIAL

ORCAA


1. Facility/Source Name: Crown Cork and Seal Company Inc.
2. Company Name (if different): _____
3. ORCAA Source ID #: 152, Facility SIC Code 3411
4. Unified Business Identification Number: 601759463
5. Company Owner: Crown Cork and Seal Company Inc.
6. Parent Company: Crown Cork and Seal Company Inc.
7. Environmental Contact for this submittal:
- | | | |
|---------------------|-----------------------------|---------------------|
| <u>Tony Ellison</u> | <u>Plant Superintendent</u> | <u>360.438.6579</u> |
| Name | Title | Phone # |
8. Mailing Address:
1202 Fones Rd SE Olympia Wa 98501

9. **Identification of Report Covered by this Certification:** *Identify the exact report that is certified as being true and accurate under this certification. Please identify the period of time covered by the report and specify any extraneous materials that are not covered by the certification.*

- a. Specify the period of time covered by the report: Jan 1 2019 – Dec 31 2019
- b. Specify the Type or Name of Report:
- Annual Compliance Certification
 - Semiannual Monitoring Report
 - Permit Deviation Report
 - Annual Emissions Inventory (must include calculations and supporting data)
 - Stack Testing Results (Within 60 days from conducting the testing)
 - Other. Specify: 19NOC1336
- c. Please specify by page number any sections of the report not covered by this certification which are provided as background information and are not necessary to support the statements and information which are certified:
- _____
- _____

10. **Certification:**

By my signature below, I certify that all information and statements in the accompanying report, which is identified in item #9 above, including all attachments are true, accurate, and complete to the best of my knowledge.

 8/14/2020
Signature Date

Luis Wanderley
Plant Manager
Title

Luis Wanderley
Printed Name



Olympia 076

2020 Outside Varnish Conversion NOC

CROWN Beverage Packaging USA

Plant 076

1202 Fones Rd. SE

Olympia, WA 98501

From: Tony Ellison

Date: Aug 20th, 2020

To whom it may concern:

During the 3rd quarter of 2020, Crown Beverage Packaging Olympia would like to covert to using 22Q05AG Overvarnish. We would terminate the usage of our 22Q05AW shortly after this conversion. The supplier, Valspar/Sherwin Williams, has discontinued the production of 22Q05AW.

Tony Ellison

A handwritten signature in blue ink, appearing to read "Tony Ellison", written over a white background.

Plant Superintendent

OLYMPIC REGION CLEAN AIR AGENCY

2940 Limited Lane NW - Olympia, Washington 98502 - 360-539-7610 – Fax 360-491-6308

FORM 1A- NOTICE OF CONSTRUCTION or REVISION REQUEST TO CHANGE NOC/NOI CONDITIONS OF APPROVAL UNDER ORCAA REGULATIONS RULE 6.1.11

Form 1 Instructions:

1. Please complete all the fields below. **This NOC application is considered incomplete until signed.**
2. If the application contains any confidential business information, please complete a Request of Confidentiality of Records (www.orcaa.org/forms).
3. Duty to Correction Application: An applicant has the duty to supplement or correct an application. Any applicant who fails to submit any relevant facts or who has submitted incorrect information in a permit application must, upon becoming aware of such failure or incorrect submittal, promptly submit supplementary factors or corrected information.

Business Name: Crown Cork & Seal		For ORCAA use only	
Mailing Address: 1202 Fones Rd Se Olympia, WA 98501		File No: 132	County No: 67
Physical Address of Project or New Source: 1202 Fones Rd Se Olympia, WA 98501		Source No: 8	Notice of Revision: 20NOC1454
Billing Address: 1202 Fones Rd Se Olympia, WA 98501		Date Received: Received AUG 18 2020	
NOC/NOI Number 19NOC1336		ORCAA	
		Date Issued: MAY 28, 2019	
<input checked="" type="checkbox"/> Request to Modify Condition # 3 d. Overvarnish % by weight of CAS 111-76-2			
<p>Please attach the following information:</p> <ol style="list-style-type: none"> 1. A description of the proposed change 2. The reason for the proposed change <p>Any additional documentation necessary to review the proposed changes and/or impacts on air quality (i.e. analysis of the change in emission, revised drawing, technical specifications)</p>			
Name of Owner of Business: Luis Wanderly		Agency Use Only	
Title: Plant Manager/Responsible Official			
Email: luis.wanderley@crowncork.com Phone: 360.438.6561			
Authorized Representative for Application (if different than owner): Plant Superintendent Anthony Ellison			
Title: Plant Superintendent			
Email: anthony.ellison@crowncork.com Phone: 360.438.6579			
I hereby certify that the information contained in this application is, to the best of my knowledge, complete and correct.			
Signature of Owner or Authorized Representative: (sign in Blue Ink)			
		Date: 8/14/20	
<p>IMPORTANT: Do not send via email or other electronic means. ORCAA must receive Original, hardcopy, signed application and payment prior to processing application.</p>			

CROWN Beverage Packaging - Olympia

Modification Discussion:

Sherwin Williams/Valspar has informed us that our existing varnish is on its last batch.

The replacement coating is analogous to the existing with some reformulation.

- The coating 22Q05AW is being replaced with 22Q14AG

CROWN is requesting a modification of 19NOC1336 term 3 d. related to the overvarnish components

The original formulation of the AG coating included a high % of DEGBE which is a Hazardous Air Pollutant under the CAA. We asked Sherwin to reformulate the coating to remove or reduce the HAP content of the coating. In reformulation of this coating, they increased other components.

We request term 3(d) of 19NOC1336 be modified to allow the plant to continue operation on the coating 22Q14AG (TDS attached). We request the EGBE move from the 3.2% listed in term 3(d) to 6.3% which is below our existing 24 hour limit of 7.4%.

TAP – 24 Hour: There will not be a 24 hour increase of any HAP or TAP against current allowable varnish at 7.4%.

VOC: There will be an overall reduction in VOC in the use of this coating compared to the existing AW. Hourly potential from: AW at 12.28 lbs VOC per hour to AG at 10.93 lbs VOC per hour.

Formaldehyde Curing:

This coating has a slight higher solids content (39.9% by wt), which is correlated to cured formaldehyde emissions however the applied solids rate will remain the same (SW correspondence). This means in a practical sense we would use less coating to achieve a similar application of solids. Anecdotally, this coating is also formulated to have a lower formaldehyde generation rate but we will assume the existing rate as conservative without additional data.

We feel comfortable that we will apply less overall coating using AG to achieve the same existing can production. However if ORCAA feels it necessary to set an enforceable limit, we would be amenable to additionally change term 3(c) in 19NOC1336 from 90,000 gallons to 89,000 gallons, which will still be easily achievable and would keep the applied solids at a comparable level from a limitation standpoint if needed.

Varnish	Gallons	Solids
22Q05AW	90000	316395
22Q14AG	89000	316048
Pounds solids	= gallons x density x wt % solids	

No 24 hour increase in HAPs or listed TAPs

No increase in VOC

No increase in cured formaldehyde emissions

No increase in applied solids



Supplier's Code: 22Q14AG Supplier: Valipor

Version: 4

Version Status: Accepted

Material Properties | Material Regulatory | Applications

Resin Modifiers (2)

Melamine Formaldehyde
Epoxy

Material Ingredients

Pigments (0)
No Record Found

Internal Labels (on Dry Film) (0)

Name	Level	Unit
Carouba	0.8	%
Hydrocarbons	0.7	%
PTFE	0.8	%

Inert Solvents (1)

CAS Number	Name	Maximum Weight % to Total Material
2000050-00-0	*Formaldehyde	0.01

Volatile Ingredients (1)

CAS Number	Name	Weight % to Volatile Ingredients	Weight % to Total Material	Volume % to Volatile Ingredients
2000111-76-2	Ethylene glycol monobutyl ether	10.5	6.3	11.4
2000075-63-1	Isobutanol	0.3	0.2	0.4
2000720-18-5	Water	94.9	51	83.2
2000108-91-0	Dimethylacetamide (DMA)	2.7	1.8	3
2064742-47-8	Diisobutyl (polyolefin), hydro-treated light	1.3	0.8	1.6
2068524-86-3	Isotridecyl alcohol	0.3	0.2	0.4

VOC Data

Liquid Density (ASTM D1475 - US, or other accredited measurement method - EU) : 8.95 kg/gal

VOC Content (Method 24 ASTM D3960 - US, or other accredited measurement method - EU) : 1.8 kg/gal

Density Wt VOC By Vol Solids (Method 24 ASTM D3960 - US, or other accredited measurement method -EU) : 2.3 kg/gal

Solvent System Density : 8.17 kg/gal

Solids Non Volatiles Weight (Method 24 ASTM D2369) : 39.9 %

Water Content Weight : 51.0 %

Solids Non Volatiles Volume (Method 24 ASTM D2369) : 34.5 %

Water Content Volume : 54.5 %

Water Content Method : ASTM 4017

VOC Calculation

Total Volatiles(Water included) Volume% : 65.60 %

Total Volatiles(Less water) Volume% : 11.00 %

Herron, Michael

To: Ellison, Anthony
Subject: FW: 22Q14AG Solids

Print for modification

mh

From: Frank Sicilia <frank.sicilia@sherwin.com>
Sent: Monday, July 20, 2020 10:11 AM
To: Herron, Michael <michael.herron@crowncork.com>
Subject: 22Q14AG Solids

Mike,

With regards to the solids differences between 22Q05AW and 22Q14AG varnishes:

- 22Q14AG ASTM Solids (% by weight) is 39.9%

Both coatings are applied to the same targeted dry film weight, by adjusting application parameters, resulting in the same transferred solids to each can.

Please advise if I can be of any further assistance.

Best Regards,

Frank

Frank Sicilia
The Sherwin-Williams Company
North America Account Manager
Packaging Coatings Group
Home Office – New Kensington, PA
Office: 724.334.8398 / Cell: 412.736.6789
frank.sicilia@sherwin.com

ORDER OF APPROVAL

NOTICE OF CONSTRUCTION 19NOC1336

ISSUED TO Crown Cork and Seal on: _____

MAY 28 2019

This Order of Approval ("Order") is issued in accordance with Olympic Region Clean Air Agency ("ORCAA") Regulations and Chapter 173-400 of the Washington Administrative Code.

Conditional approval to use two new inside spray lacquers in the can coating lines ("Approved Equipment") at 1202 Fones Road in Olympia ("Approved Location") for operation solely as described in the associated Notice of Construction ("NOC") application No. 19NOC1336, is hereby GRANTED to Crown Cork and Seal ("Applicant"), subject to the Conditions of Approval listed below.

This Order and the Conditions of Approval herein remain in effect for the life of the Approved Equipment as used at the Approved Location and shall be binding on Applicant, current owners and operators of the equipment, and Applicant's heirs, successors and assigns unless amended or superseded by a subsequent Order issued by ORCAA or unless the equipment is permanently shut down. The Applicant must notify any subsequent owner, operator, heirs, successor or assigns of this Order and the Conditions of Approval herein. Conditions of Approval established in this Order shall be enforceable in addition to any applicable state, local and federal regulations or standards in existence now or in the future. Compliance with the conditions of this Order do not relieve the Applicant or any owner or operator from compliance with ORCAA Regulations, Chapter 70.94 Revised Code of Washington (RCW), or any other emissions control requirements, nor from any penalties for failure to comply with the same. Applicant may appeal this Order to the Pollution Control Hearings Board ("PCHB") by filing a written appeal with the PCHB and serving a copy upon ORCAA within thirty (30) days of receipt of this Order.

This Order is GRANTED, subject to the following Conditions of Approval, which supersede the Conditions of Approval issued under NOC# 17NOC1261:

- 1. Approved Coating Materials:** The coating materials as described in the following table and in Notice of Construction (NOC) #17NOC1261 and #19NOC1336, are approved for use at Crown Cork and Seal Co located at 1202 Fones Road, in Olympia, Washington. Deviations from approved specifications, whether stated in the above listed NOC or this Order of Approval, may constitute a violation of this condition and ORCAA regulations, unless prior approval is granted by ORCAA.

Coating Type	Approved Coatings
Inside Spray Lacquer	9823-001
	40Q60AA
	V70Q11AA
	83XW098
	PPG2012825
	V70Q38AA

Overvarnish	22Q05AW
	CT 4891
	9201811
	9201807
	3852815

[Regulatory Basis: ORCAA 6.1.2 (I)]

2. **Material Changes:** The owner or operator may make changes in the composition of the approved coating materials or use new inside spray lacquers or overvarnishes without prior approval from ORCAA if all the following conditions are met:
- The coating meets all the applicable limits in Conditions 3 and 4 of this Order of Approval.
 - The coating complies with the applicable VOC emission standards in 40 CFR Part 60 Subpart WW.
 - The inside spray lacquer does not contain any toxic air pollutants as defined by Chapter 173-460 WAC, except for 2-butoxyethanol, formaldehyde, and phenol.
 - The overvarnish does not contain any toxic air pollutants as defined by Chapter 173-460 WAC, except for 2-butoxyethanol and formaldehyde.
 - The inside spray lacquer does not contain any hazardous air pollutants as defined by the Federal Clean Air Act, except for glycol ethers, formaldehyde, and phenol.
 - The overvarnish does not contain any hazardous air pollutants as defined by the Federal Clean Air Act, except for glycol ethers and formaldehyde.

[Regulatory Basis: ORCAA 6.1.2 (I)]

3. **Coating Limits:** The owner or operator shall comply with the following limits:
- The total amount of inside spray lacquer used shall not exceed 297,000 gallons per consecutive 12-month period.
 - All inside spray lacquers shall not contain more than 6.8% by weight 2-butoxyethanol (CAS 111-76-2).
 - The total amount of overvarnish used shall not exceed 90,000 gallons per consecutive 12-month period.
 - All overvarnish, except for specialty overvarnish as detailed in (e) of this condition, shall not contain more than 3.2% by weight 2-butoxyethanol (CAS 111-76-2).
 - Crown may use specialty overvarnish up to 13,500 gallons per consecutive 12-month period. Specialty overvarnish shall not contain more than 7.4% by weight 2-butoxyethanol (CAS 111-76-2).

[Regulatory Basis: ORCAA 6.1.2 (I)]

4. **BACT:** The following coating specifications shall apply:
- No inside spray lacquers shall contain more than 0.5% by weight glycol ethers, as defined by the Federal Clean Air Act.
 - No overvarnish shall contain glycol ethers as defined by the Federal Clean Air Act.

c. No inside spray lacquers shall contain more than 0.2% by weight phenol.
[Regulatory Basis: ORCAA 6.1.2(l); ORCAA 6.1.4(a)(2)]

5. **Material Use Limit Monitoring:** Compliance with the material use limits in Conditions 3 shall be monitored on at least monthly by calculating the actual amount of each type of inside spray lacquer and overvarnish used during the previous month and 12-consecutive month period.

[Regulatory Basis: ORCAA Rule 8.11]

6. **Recordkeeping:** The following records shall be maintained for at least five years from the date the record originated, or as specified, and made available for inspection upon request:

- a. Records of all determinations made under Condition 2 for changes in composition of approved coatings or new coatings.
- b. Records of monthly and 12-month rolling totals of material usage as required by Condition 3.
- c. Records of material usage, composition data, and any other data used to calculate emissions.
- d. Safety data sheets (SDS) for all VOC-containing materials used in the process.

[Regulatory Basis: ORCAA Rule 8.8]

Jennifer DeMay 5/28/19
PREPARED BY Jennifer A. DeMay, P.E. Date

Mark V. Goodin 5/28/19
REVIEWED BY Mark V. Goodin, P.E. Date





NOTICE OF CONSTRUCTION FINAL DETERMINATION TO APPROVE Olympic Region Clean Air Agency

Issued to: Crown Cork & Seal
Location: 1202 Fones Road
Olympia, WA 98501
Application: 19NOC1336
Prepared on: May 2, 2019

File: 152
Cnty: 67
SRCE: 8
RC: OP1

1. Proposal and Final Determination

Crown Cork & Seal (Crown) is an existing aluminum beverage can manufacturing facility located at 1202 Fones Road in Olympia, Washington. Crown proposes to use two new inside spray lacquers (PPG2012825 and V70Q38AA) which is a change in the method of operation that will increase emissions and triggers the requirement to secure ORCAA's approval of a NOC application prior to beginning use.

ORCAA's final determination is that the criteria for approving new stationary sources of air emissions under ORCAA's Rule 6.1 are met. Based on this conclusion, ORCAA's Final Determination is that Crown's proposed use of two new inside spray lacquers (PPG2012825 and V70Q38AA) be conditionally approved.

The proposed Conditions of Approval are included in Section 14.

2. New Source Review

NSR is the air permitting process pursuant to the Washington Clean Air Act under Chapter 70.94 RCW that requires review and evaluation of air quality implications prior to construction, installation, establishment or modification of any new air contaminant source. The goal of NSR is to assure new sources of air pollution and changes to air pollution controls are established in a manner that maintains compliance with applicable air regulations and standards, including equipment performance standards and ambient air quality standards. NSR is initiated by the project proponent submitting a Notice of Construction (NOC) application containing information on the proposed project of sufficient detail to characterize air impacts.

As Crown's proposal involves use of new coating materials that will increase emissions from emission points, this proposal is considered a change in the method of operation of an air contaminant source which triggers NSR.

Opportunity to express interest in a NOC application is required for all NOC applications ORCAA receives. ORCAA accomplishes this by posting NOC fact sheets for all applications received on ORCAA's website. NOC fact sheets include a brief summary of the proposal and how to submit comments and/or request a public hearing. During the NOC application noticing period, interested persons may request a formal 30-day public comment period and may also request a public hearing. A formal 30-day public comment period is required if a NOC application generates significant public interest during the application noticing period, or if the project triggers an automatic 30-day comment period. ORCAA is required to hold a public hearing before taking final action on any NOC application that generates significant public concern.

Approval of a NOC is contingent on verifying the proposed project will likely meet the following criteria of approval from ORCAA's Rule 6.1:

1. **Performance Standards** - Any new or modified stationary source or altered air pollution control device will likely comply with applicable air-performance standards such as the federal new source performance standards (NSPS), national emission standards for hazardous air pollutants (NESHAPs), and any performance standards adopted under chapter 70.94 of the Revised Code of Washington (RCW);
2. **BACT** - The new or modified stationary sources are controlled to a level that meets the standard of "Best Available Control Technology" (BACT);
3. **Ambient Air Quality** - Any increase in air emissions will not cause or contribute to violation of any ambient air quality standard;
4. **Air Toxics** - If there are increases toxic air pollutant (TAP) emissions, the requirements of Washington's Controls for New Sources of Toxic Air Pollutants under Chapter 173-460 WAC (Washington Administrative Code) are met; and
5. **Federal Air Permitting Requirements** - All applicable federal air permits, if required, are secured.

3. Facility History

A detailed facility history is contained within the Crown Cork & Seal Technical Support Document (TSD).

Crown submitted a Notice of Construction in 2017 for changes to inside spray lacquers and specialty overvarnishes. ORCAA approved this change on April 4, 2018 (NOC# 17NOC1261).

4. Facility Description

Crown Cork & Seal Company (USA), Inc. owns and operates an aluminum beverage can manufacturing facility located at 1202 Fones Road in Olympia, Washington.

Can Coating Process

After the aluminum cans are formed, washed, and etched, the cans proceed to the coating process. The bottom of the can body is coated with a varnish which reduces friction and improves the can mobility through the rest of the process. Following rim coating the cans are

sent to one of two can coating lines. Each can coating line is comprised of a decorator unit (a.k.a. Printer/Over-varnish unit), a printer (PIN) oven, lacquer spray machines (LSM), and internal bake oven (IBO).

In the decorator unit, the exterior of the cans are coated using a two-step process. Ink is applied by rotating the cans against a rotating rubber printing blanket and then overvarnish is applied with a varnish roller. Overvarnish is applied in slightly different weights dependent on the type of overvarnish applied. After printing and varnishing, the cans are blown by air onto pins and transported into the printer (PIN) oven for curing. The can spends approximately six seconds inside the natural gas-fired PIN oven. Typical oven temperature is 365-390 degrees Fahrenheit. The cans are heated indirectly in both PIN ovens. In Line 1, emissions from the use and curing of ink and varnish and combustion of natural gas are predominantly exhausted from one stack (1A), although small amounts of emissions were found in the cooling zone stack (1B) during the last stack test. In Line 2, emissions from the use and curing of ink and varnish and combustion of natural gas are exhausted from one stack. Air emissions that result from outside printing and varnishing of the cans include volatile organic compounds (VOCs), hazardous air pollutants (HAPs), toxic air pollutants (TAPs), and products of combustion from combustion of natural gas in the PIN ovens.

After curing in the PIN ovens, the inside of the can bodies are coated with an inside lacquer. The purpose of the inside lacquer is to provide a barrier preventing corrosion of the metal can by the soda or beer that will be contained in the can. Each coating line has seven lacquer spray machines (LSMs) that are vented collectively to a stack. Each machine contains a spray unit that applies lacquer to the inside of cans. Lacquer is applied in three different weights (from lowest to highest): beer weight, beverage weight, and import weight. After lacquer is applied, the cans are cured in a natural gas-fired internal bake oven (IBO). Each IBO has two burners, one in each curing zone. Typical oven temperatures are 375 degrees Fahrenheit in Zone 1 and 400-405 degrees Fahrenheit in Zone 2. The cans are heated indirectly, however, combustion gases are combined with exhaust from the curing of lacquer and are exhausted from the IBO stacks (one for each unit). Emissions from applying lacquer to the inside of the cans include VOC, HAPs, TAPs, and products of combustion from combustion of natural gas in the IBOs.

Proposed Changes

Crown proposes to use two new BPA³-free inside spray lacquers (PPG2012825 and V70Q38AA) in the Lacquer Spray Machines on a permanent basis. They may also continue to use the other inside lacquers used in recent years (40Q60AA, 9823-001, and 83XW098). They do not plan to continue to use V70Q11AA, but as they will continue to use this lacquer until they have transitioned to one of the new inside spray lacquers it will be included in the list of approved lacquers in the Order of Approval. All inside lacquers are applied in the existing lacquer spray machines (LSMs) and cured in the existing inside bake oven (IBOs).

³ BPA stands for bisphenol A. Bisphenol A is an industrial chemical that has been used to make certain plastics and resins since the 1960s. Some research has shown that BPA can seep into food or beverages from containers that are made with BPA. Exposure to BPA is a concern because of possible health effects.

5. Emissions

The can coating lines are sources of volatile organic compounds (VOCs), hazardous air pollutants (HAP), and toxic air pollutants (TAP). Natural gas combustion in the curing ovens (IBOs and PINs) are a source of combustion emissions, primarily oxides of nitrogen and carbon monoxide.

This proposal will result in increases in HAP and TAP emissions from the application and curing of inside lacquer. Although the new inside spray lacquers contain higher concentrations of VOC, Crown is not proposing to increase its facility-wide VOC limit. Therefore, actual increases in VOC emissions due to this project will remain below the current facility-wide limit of 249 tons per consecutive 12-month period.

Table 1 shows the current potential to emit (PTE) of the facility as well as the proposed facility-wide emissions increases and annual facility-wide potential to emit (PTE) for all criteria pollutants, HAPs, and TAPs.

Table 1. Facility-Wide PTE Emissions in Tons/Year

	CAS No.	Current Facility-wide Potential to Emit (tons/yr)	Proposed Emissions Increases (tons/yr)	Proposed Facility-wide Potential to Emit (tons/yr)
TSP	NA	0.1	0	0.1
PM ₁₀	NA	0.1	0	0.1
PM _{2.5}	NA	0.1	0	0.1
CO	630-08-0	15.4	0	15.4
NO _x	NA	18.4	0	18.4
SO ₂	7446-09-5	0.11	0	0.11
VOC	NA	249	0	249
Formaldehyde	50-00-0	9.9	0	9.9
2-butoxyethanol (EGBE) (TAP only)	111-76-2	92	8.9	101
Glycol ethers (HAP only)	NA	6.3	0	6.3
Phenol (HAP/TAP)	108-95-2	0	2.5	2.5

6. Performance Standards

ORCAA's Rule 6.1.4(a)(1) requires a finding that any new or modified stationary source will likely comply with applicable state, federal and local performance standards for air emissions including emission standards adopted under chapter 70.94 of the Revised Code of Washington (RCW), emissions standards of ORCAA, and federal emission standards including new source performance standards (NSPS), national emission standards for hazardous air pollutants (NESHAP), national emission standards for hazardous air pollutants for source categories (MACT standards).

All emissions units at the facility are currently subject to the generally applicable air requirements from ORCAA's regulations and from the State's General Regulations for Air Pollution Sources under Chapter 173-400 of the Washington Administrative Code (WAC). These standards will continue to apply to both the existing equipment.

40 CFR Part 60 Subpart WW – Standards of Performance of the Beverage Can Surface Coating Industry

In addition to these general requirements, the new coatings will be subject to 40 CFR Part 60 Subpart WW: Standards of Performance for the Beverage Can Surface Coating Industry (Subpart WW). Subpart WW applies to new, modified, or reconstructed facilities at beverage can surface coating lines including each exterior base coat operations, each overvarnish coating operations, and each inside spray coating operation provided the modification or reconstruction is commenced after November 26, 1980.

In March 1998 under NOC 97NOC040, Crown installed a new printing and over-varnish unit and PIN oven for use as a swing line. This constituted a modification of an affected facility and triggered requirements in Subpart WW of 40 CFR Part 60. An Initial Compliance Demonstration for Subpart WW was received by ORCAA on April 14, 1998 addressing compliance for two types of over-varnish (body varnish and UV bottom varnish) and inside spray coating.

The affected facility consists of five coating operations: three overvarnish coating operations (one UV bottom varnish and two body varnish) and two inside spray coating operations. The UV bottom coat operation consists of a roll coat application and UV curing system. Each inside and outside coating operation consists of the coating application station, flashoff area, and curing oven. Crown does not have any exterior base coating operations at this facility, therefore, the exterior base coating limits are not currently applicable.

Subpart WW requirements include compliance with emissions standards and monthly performance tests. Volume weighted calendar-month average emissions shall not exceed:

1. 0.46 kilogram of VOC per liter of coating solids from each over-varnish coating operation.
2. 0.89 kilogram of VOC per liter of coating solids from each two-piece can inside spray coating operation.

The proposed inside spray lacquers, PPG2012825 and V70Q38AA, contain 0.86 and 0.78 kilogram VOC per liter of coating solids, respectively, and are therefore, Subpart WW-compliant two-piece can inside spray lacquers. (The existing over varnishes and inside spray lacquers including in the Order of Approval are also Subpart WW-compliant.) Crown currently complies with the monthly performance tests by determining the VOC content of the coatings based on manufacturer-supplied formulation data on a monthly basis.

40 CFR Part 63 Subpart KKKK – National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Cans

The National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Cans was promulgated on November 13, 2003 and applies to all metal can surface coating operations at major sources. This rule applies to owners or operators of metal can surface coating operations that use at least 5,700 liters (1,500 gallons) of coatings per year and are major sources of HAPs or are part of a major source.

In this case, Crown Cork & Seal USA, Inc. (Crown) has a federally enforceable, voluntary limit (established through 05NOC420) on emission of hazardous air pollutants (HAPs). This limit established Crown as minor source of HAPs. As a minor source of HAPs Crown is not subject to the requirements of 40 CFR Part 63 Subpart KKKK. Crown does not propose to increase its emissions of HAPs above the current applicable limits. (Ethylene glycol monobutyl ether (2-butoxyethanol) (CAS 111-76-2) was removed from the list of hazardous air pollutants in November 2004.)

Although other federal standards do apply to the facility (40 CFR Part 63 Subpart ZZZZ), these standards do not apply to this specific proposal. See the Technical Support Document for Crown's Air Operating Permit for more details on what federal regulations apply.

ORCAA staff's conclusion is that compliance with applicable performance standards is likely for existing and modified emission units. This conclusion satisfies the criteria of approval required under ORCAA Rule 6.1.4(a)(1).

7. Best Available Control Technology (BACT)

In addition to applicable performance standards, Best Available Control Technology (BACT) is the required level of control for emissions of Criteria Air Pollutants from new or modified emissions units. Likewise, Best Available Control Technology for Toxic Air Pollutants (T-BACT) is the required level of control for TAP emissions from new or modified emissions units that will emit TAP. BACT and T-BACT share the same definition from Chapter 173-400-030 WAC as, *"an emission limitation based on the maximum degree of reduction for each air pollutant subject to regulation under chapter 70.94 RCW emitted from or which results from any new or modified stationary source, which the permitting authority, on a case-by-case basis, taking into account energy, environmental, and economic impacts and other costs, determines is achievable for such source or modification through application of production processes and available methods, systems, and techniques, including fuel cleaning, clean fuels, or treatment or innovative fuel combustion techniques for control of each pollutant."*

The proposal will increase emissions of the Toxic Air Pollutant (TAP) phenol (CAS 108-95-2) from the lacquer spray machines and inside bake ovens above de minimis; therefore, BACT is required. As the increase of emissions of 2-butoxyethanol are below de minimis, BACT is not required for 2-butoxyethanol (see Section 9). ORCAA staff reviewed Crown's proposal and concludes that the pollution prevention strategies proposed meet BACT. The following table summarizes BACT and T-BACT for proposed new or modified emissions units at the facility.

Table 2. BACT and T-BACT Summary

Pollutant	BACT Applicability	BACT & T-BACT Description
NOx	No	
CO	No	
VOC	No	
SO2	No	
PM10	No	
Toxics	Yes (phenol)	Use of inside spray lacquers that meet all the following criteria: 1) 40 CFR Part 60 Subpart WW-compliant (low-VOC) 2) Low-HAP coating 3) Contain TAPs with lower toxicity than alternatives

8. Ambient Air Quality Impacts Analysis (Criteria Pollutants)

Ambient Air Quality Standards (AAQS) that apply in Thurston County include both the National Ambient Air Quality Standards (NAAQS) and Washington Ambient Air Quality Standards (WAAQS). ORCAA’s Rule 6.1.4(a)(3) requires demonstration that any new stationary source of air pollution or modification to an existing stationary source of air pollution not delay the attainment date for an area not in attainment, or cause or contribute to a violation of any AAQS. This is typically accomplished through an Ambient Air Quality Impacts Analysis (Impacts Analysis). Typically, an Impacts Analysis requires use of air dispersion models to predict concentrations of air pollutants at the fence line of a facility and beyond. Air dispersion models consider the air pollutant emissions rate of the new source being evaluated, characteristics of the new source, topography and local meteorological data, and use this information to predict the maximum concentrations of pollutants outside the property line of the facility.

Regulatory standards for conducting Impacts Analyses are largely dictated by EPA through formal guidance on ambient air dispersion modeling techniques. EPA’s Guideline on Air Quality Models in 40 CFR 51 Appendix W (The Guideline) addresses the regulatory application of air quality models for assessing air pollutant impacts under the Clean Air Act. The objective of EPA’s guidance on air dispersion modeling is to ensure consistent Impacts Analyses under the Clean Air Act. EPA’s guidelines also help ensure Impacts Analyses provide reliable results that can be used to protect air quality and maintain compliance with the NAAQS. ORCAA is responsible for reviewing all modeling decisions and data used in the Impacts Analysis with respect to the regulatory standards and practices recommended by EPA. Any deviation from recommendations in The Guideline must be justified for a particular Impacts Analysis.

There are no expected increases in criteria pollutant emission rates, therefore, the proposal is not expected to cause or contribute to a violation of any AAQS.

9. Ambient Air Quality Impacts Analysis (Toxic Air Pollutants)

Washington’s regulations titled Controls for New Sources of Toxic Air Pollutants (Air Toxics Regulation) under Chapter 173-460 of the Washington Administrative Code apply to new

stationary sources of TAP. The purpose of this regulation is to, "... maintain such levels of air quality as will protect human health and safety." The TAP covered under the regulation include carcinogens and non-carcinogens. The regulation allows for a multi-tiered approach to assess potential health and safety impacts from TAP increases.

The "First Tier Review" involves comparing estimated ambient TAP impacts with the Acceptable Source Impact Levels (ASILs), which are established in the Air Toxics Regulation on a pollutant-by-pollutant basis. If the modeled impact of the increase in emissions of a TAP does not exceed its corresponding ASIL, the First Tier Review is passed for that TAP. This analysis typically involves the use of an ambient air quality model to predict ambient concentrations of the pollutant followed by a comparison with the ASIL. However, the Air Toxics Regulation also provides that if the calculated emission rate is less than the Small Quantity Emission Rate (SQER) for any TAP, then emissions are sufficiently low to ensure compliance with the ASIL without further analysis (WAC 173-460-020(7)). SQER are listed in the Air Toxics Regulation for all TAP.

For pollutants with an ambient concentration found to be greater than the ASIL, a "Second Tier Review" is required by the Air Toxics Regulation. Second Tier Reviews require more refined modeling analyses and approval by the Washington Department of Ecology in addition to ORCAA's review. Lastly, for those pollutants that cannot pass a Second Tier Review, the Air Toxics Regulation requires an even more refined "Third Tier Review."

The only TAP emissions increases are from 2-butoxyethanol (CAS 111-76-2) and phenol (CAS 108-95-2). For the ambient air toxics analysis, emission increases from 2-butoxyethanol and phenol were calculated on a worst-case 24-hour basis based on the maximum coating application rate and 24 hours of continuous operation. As the emissions increase from 2-butoxyethanol and phenol were below the SQER, ORCAA staff concluded that compliance with the ambient air toxics analysis requirement in Chapter 173-460 WAC has been demonstrated.

Table 3. Results of First Tier Review

TAP (averaging period)	Net Change (lbs/24-hr)	De Minimis (lbs/24-hr)	Tier 1 Required?	SQER (lbs)	Modeling Required? (yes/no)	Tier 2 Required? (yes/no)
2-butoxyethanol (24-hr)	60.3	85.4	No	1710	No	No
Phenol (24-hr)	17.0	1.31	Yes	26.3	No	No

10. Title V Air Operating Permit (AOP)

Crown Cork & Seal is a major source with respect to the Title V program. The change approved by this Notice of Construction does not require a revision to the AOP under WAC 173-401-700 as it qualifies as an "off-permit change" according to WAC 173-401-724. The change is not specifically addressed or prohibited by the permit terms and conditions and will not weaken the

enforceability of the existing permit conditions. Contemporaneous written notice is required by WAC 173-401-724.

11. Prevention of Significant Deterioration (PSD) Permitting

A PSD permit is not required since the proposed new stationary source or modification will result in a minor source with respect to the State's PSD program in WAC 173-400-141.

12. SEPA Review

The proposal only involves changes in raw materials used. No new equipment will be installed, and no physical modifications will be made to existing equipment. There are no changes in use as the facility will continue to produce aluminum beverage cans. Therefore, this proposal is exempt from SEPA per WAC 197-11-800(3) since the project involves only repair, remodeling, maintenance or minor alteration of existing structures, equipment or facilities and will involve no material expansions or changes in use.

13. Public Involvement

Public notice of ORCAA's receipt of the NOC application, pursuant to ORCAA 1.7.04(a), was issued March 12, 2019. No comments were received during the comment period. A mandatory 30-day public notice and comment period is not triggered.

14. Conditions of Approval

The following conditions of approval are recommended to be included in the Order of Approval (Order) issued by ORCAA for approving this NOC application. Once approved, conditions in the Order become applicable requirements that are enforceable and may be subject to enforcement actions including penalties if compliance is not maintained. This Order will supersede the Order of Approval for NOC# 17NOC1261.

1. **Approved Coating Materials:** The coating materials as described in the following table and in Notice of Construction (NOC) #17NOC1261 and #19NOC1336, are approved for use at Crown Cork and Seal Co located at 1202 Fones Road, in Olympia, Washington. Deviations from approved specifications, whether stated in the above listed NOC or this Order of Approval, may constitute a violation of this condition and ORCAA regulations, unless prior approval is granted by ORCAA.

Coating Type	Approved Coatings
Inside Spray Lacquer	9823-001
	40Q60AA
	V70Q11AA
	83XW098
	PPG2012825
	V70Q38AA
Overvarnish	22Q05AW
	CT 4891

	9201811
	9201807
	3852815

[Regulatory Basis: ORCAA 6.1.2 (I)]

2. **Material Changes:** The owner or operator may make changes in the composition of the approved coating materials or use new inside spray lacquers or overvarnishes without prior approval from ORCAA if all the following conditions are met:
- The coating meets all the applicable limits in Conditions 3 and 4 of this Order of Approval.
 - The coating complies with the applicable VOC emission standards in 40 CFR Part 60 Subpart WW.
 - The inside spray lacquer coating does not contain any toxic air pollutants as defined by Chapter 173-460 WAC, except for 2-butoxyethanol, ~~and~~ formaldehyde, and phenol.
 - The overvarnish coating does not contain any toxic air pollutants as defined by Chapter 173-460 WAC, except for 2-butoxyethanol and formaldehyde.
 - The inside spray lacquer coating does not contain any hazardous air pollutants as defined by the Federal Clean Air Act, except for glycol ethers, ~~and~~ formaldehyde, and phenol.
 - The overvarnish coating does not contain any hazardous air pollutants as defined by the Federal Clean Air Act, except for glycol ethers and formaldehyde.

[Regulatory Basis: ORCAA 6.1.2 (I)]

3. **Coating Limits:** The owner or operator shall comply with the following limits:
- The total amount of inside spray lacquer used shall not exceed 297,000 gallons per consecutive 12-month period.
 - All inside spray lacquers shall not contain more than 6.8% ~~6.1%~~ by weight 2-butoxyethanol (CAS 111-76-2).
 - The total amount of overvarnish used shall not exceed 90,000 gallons per consecutive 12-month period.
 - All overvarnish, except for specialty overvarnish as detailed in (e) of this condition, shall not contain more than 3.2% by weight 2-butoxyethanol (CAS 111-76-2).
 - Crown may use specialty overvarnish up to 13,500 gallons per consecutive 12-month period. Specialty overvarnish shall not contain more than 7.4% by weight 2-butoxyethanol (CAS 111-76-2).

[Regulatory Basis: ORCAA 6.1.2 (I)]

4. **BACT:** The following coating specifications shall apply:
- No inside spray lacquers shall contain more than 0.5% by weight glycol ethers, as defined by the Federal Clean Air Act.
 - No overvarnish shall contain glycol ethers as defined by the Federal Clean Air Act.
 - No inside spray lacquers shall contain more than 0.2% by weight phenol.

[Regulatory Basis: ORCAA 6.1.2(f); ORCAA 6.1.4(a)(2)]

5. **Material Use Limit Monitoring:** Compliance with the material use limits in Conditions 3 shall be monitored on at least monthly by calculating the actual amount of each type of inside spray lacquer and overvarnish used during the previous month and 12-consecutive month period.

[Regulatory Basis: ORCAA Rule 8.11]

6. **Recordkeeping:** The following records shall be maintained for at least five years from the date the record originated, or as specified, and made available for inspection upon request:

- a. Records of all determinations made under Condition 2 for changes in composition of approved coatings or new coatings.
- b. Records of monthly and 12-month rolling totals of material usage as required by Condition 3.
- c. Records of material usage, composition data, and any other data used to calculate emissions.
- d. Safety data sheets (SDS) for all VOC-containing materials used in the process.

[Regulatory Basis: ORCAA Rule 8.8]

Jennifer DeMay 5/28/19
PREPARED BY: Jennifer A. DeMay, P.E. Date

Mark V. Goodin 5/28/19
REVIEWED BY: Mark V. Goodin, P.E. Date

ATTACHMENTS

- Emission Calculations
- Public Involvement

Emission Calculations

PERMITS PROVIDED	MAINTENANCE	CONSTRUCTION	OPERATIONAL	ASBESTOS	CRUISE	GEOTECHNICAL	HAZARDOUS	WATER	WASTE	WATER	WASTE	WATER	WASTE	WASTE	WASTE	WASTE	WASTE	WASTE		
191000111	191000112	191000113	191000114	191000115	191000116	191000117	191000118	191000119	191000120	191000121	191000122	191000123	191000124	191000125	191000126	191000127	191000128	191000129		
0.71	0.71	0.71	0.71	0.71	0.71	0.71	0.71	0.71	0.71	0.71	0.71	0.71	0.71	0.71	0.71	0.71	0.71	0.71	0.71	
0.83	0.83	0.83	0.83	0.83	0.83	0.83	0.83	0.83	0.83	0.83	0.83	0.83	0.83	0.83	0.83	0.83	0.83	0.83	0.83	0.83
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0.05	0.05	0.05	0.05	0.05	0.05	0.05	0.05	0.05	0.05	0.05	0.05	0.05	0.05	0.05	0.05	0.05	0.05	0.05	0.05	0.05

Public Involvement

← → ↻ 🏠 🔒 <https://www.orcaa.org/public-comment-due-3-27-19-for-noc-applications/>

★ Bookmarks 📄 Office365 🗑 ORCAA 🌿 Ecology 📄 Regulations 📄 PublicRecords 🇺🇸 EPA



HOME AIR QUALITY ASBESTOS BURNING PERMITS & REGISTRAT

NOC permits, Public Comments

Public Comment Due 3/27/19 for NOC Applications

By Dan March 12, 2019

The following applications for approval of construction or modification of an air pollution source have been received by ORCAA. A formal public comment period will be provided if requested by any person, government agency, group, or the applicant.

1 - Applicant: Crown Cork & Seal Co. Inc.

Location: 1202 Fones Road SE, Olympia

Description: 19NOC1336 -

Type: Notice of Construction - NOC

Posted: March 12, 2019

Point of Contact: Jennifer DeMay, 360-539-7610 - jennifer.demay@orcaa.org

2 - Applicant: Aberdeen Cemetery Association, Inc.

Location: 2212 Roosevelt St., Aberdeen

Description: 19NOC1337 - Modify condition 2B of 17NOC1227 - allow non-daylight hours for cremation

Type: Notice of Revision - NOR

Posted: March 12, 2019

Point of Contact: Aaron Marley, 360-539-7610 - aaron.marley@orcaa.org

2 - Applicant: McKinley Paper Company

Location: 1902 Marine Drive, Port Angeles

Description: 19NOC1327 - Establish a stock preparation project

Type: Notice of Construction - NOC

Posted: March 12, 2019

Point of Contact: Mark Goodin, 360-539-7610 - mark.goodin@orcaa.org

To express interest in an application, submit your comments in writing by the deadline listed below. Please be sure to list the NOC # of the application you are commenting on:

Deadline: March 27, 2019

By Mail: ORCAA, 2940 Limited Lane NW, Olympia, WA 98502

By Fax: (360) 491-6303

By Email: see Point of Contact info block on each application listed above

OLYMPIC REGION CLEAN AIR AGENCY

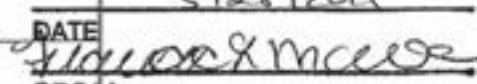
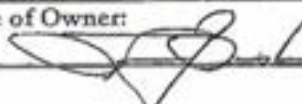
2940 Limited Lane N.W. - Olympia, Washington 98502 - 360-539-7610 - Fax 360-491-6308

FORM 1- NOTICE OF CONSTRUCTION

TO CONSTRUCT - INSTALL - ESTABLISH OR MODIFY AN AIR CONTAMINANT SOURCE

Form 1 Instructions:

1. Please complete all the fields below. This NOC application is considered incomplete until signed.
2. If the application contains any confidential business information, please complete a Request of Confidentiality of Records (www.orcaa.org/forms).
3. Duty to Correction Application: An applicant has the duty to supplement or correct an application. Any applicant who fails to submit any relevant facts or who has submitted incorrect information in a permit application must, upon becoming aware of such failure or incorrect submittal, promptly submit supplementary factors or corrected information.

Business Name: Crown Cork & Seal		For ORCAA use only	
Mailing Address: 1202 Fones Rd Se Olympia Wa, 98501		File No: 132	County No: 67
Physical Address of Project or New Source: 1202 Fones Rd Se Olympia Wa, 98501		Source No: 8	Application No: 1912011334
Billing Address: 1202 Fones Rd Se Olympia Wa, 98501		Date Received: RECEIVED MAR 04 2019 ORCAA	
Are you currently registered with ORCAA? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>			
Project/ Equipment to be installed/ established: PPG2012825 & V70Q38AA BPANI I/S Spray			
Previous business name (if any):			
<p>This project must meet the requirements of the State Environmental Policy Act (SEPA) and applicable building and fire codes before ORCAA can issue final approval. Complete one of the following options.</p> <p><input type="checkbox"/> SEPA was satisfied by _____ (government agency) on ___/___/___ (date). A copy of the final determination and the environmental checklist is enclosed.</p> <p><input type="checkbox"/> SEPA is pending approval by _____ (government agency). A copy of the environmental checklist is enclosed and a copy of the final determination will be forwarded to ORCAA when issued.</p> <p><input checked="" type="checkbox"/> ORCAA is the only government agency requiring a permit. A completed environmental checklist or documentation that the project or new source is/will be in compliance with local building and fire codes is enclosed.</p> <p><input type="checkbox"/> This project is exempt from SEPA per _____ (WAC citation).</p>			
Name of Owner of Business: Leonard Bush		Agency Use Only	
Title: Plant Manager		CONDITIONALLY APPROVED FOR CONSTRUCTION ONLY IN ACCORDANCE WITH RCW 70.94, WAC 173-400 ORCAA REGULATIONS (SEE ATTACHED ADDENDUM FOR CONDITIONS OF APPROVAL) 5/28/2019  DATE ORCAA	
Email: leonard.bush@crowncork.com	Phone: 360-438-6561		
Application Contact Name (if different than owner): Tony Ellison			
Title: Plant Engineer	Phone: 360-438-6579		
Email: anthony.ellison@crowncork.com	Phone: 360-438-6579		
Facility Operations Contact Name (if different than owner): Tony Ellison			
Title: Plant Engineer			
Email: anthony.ellison@crowncork.com			
I hereby certify that the information contained in this application is, to the best of my knowledge, complete and correct.			
Signature of Owner: 		Date: 2/7/2019	

ORIGEN D:OLMA (360) 439-0562
JACOB ARNOLD
CROWN BEVERAGE PACKAGING
1202 FONES RD
OLYMPIA, WA 98501
UNITED STATES US

SHIP DATE: 14AUG20
ACTWGT: 1.00 LB
CAD: 100722126NMT4280

BILL SENDER

TO JENNIFER DEMAY
OLYMPIC REGION CLEAN AIR AGENCY
2940 LIMITED LANE NW

OLYMPIA WA 98502

(000) 000-0000 PER PAYOR/SHIP: DAM/DACY
NY DEPT
PO

568277098766



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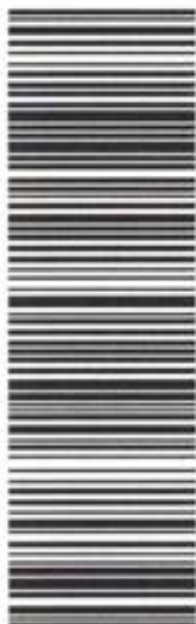
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Received
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ORCAA

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Use of this system constitutes your agreement to the service conditions in the current FedEx Service Guide, available on fedex.com. FedEx will not be responsible for any claim in excess of \$100 per package, whether the result of loss, damage, delay, non-delivery, misdelivery, or misinformation, unless you declare a higher value, pay an additional charge, document your actual loss and file a timely claim. Limitations found in the current FedEx Service Guide apply. Your right to recover from FedEx for any loss, including intrinsic value of the package, loss of sales, income interest, profit, attorney's fees, costs, and other forms of damage whether direct, incidental, consequential, or special is limited to the greater of \$100 or the authorized declared value. Recovery cannot exceed actual documented loss. Maximum for items of extraordinary value is \$1,000, e.g. jewelry, precious metals, negotiable instruments and other items listed in our ServiceGuide. Written claims must be filed within strict time limits, see current FedEx Service Guide.

DOMESTIC TRUCK BILL OF LADING
CROWN Cork & Seal Company USA, Inc. AND AFFILIATED COMPANIES

RECEIVED, subject to the terms and conditions of the agreement between the shipper and carrier in effect on the date of shipment, the property described below, in apparent good order, except as noted (contents and conditions of package unknown), marked, consigned, and destined as shown below. This Bill of Lading is not subject to any tariffs or classification, whether individually determined or filed with any federal or state regulatory agency, except as specifically agreed to in writing by the shipper and carrier. Rate is individually determined and **NOT** subject to filed tariffs unless otherwise stated on the face of the Bill of Lading.

FROM: Crown Cork & Seal
1202 Foner Rd.
Olympia, WA 98501

BOL #: 076 M275464
SHIP PLANT: 076 DATE: 8.14.20
BILL PLANT: 076 TIME: 15:00

TO: Jennifer Demay
2945 Limited Drive NW
Olympia, WA 98502

CARRIER CODE: _____
VEH. LENGTH: _____
VEH. NUMBER: _____
FREIGHT PPD: _____ COL: _____
RELEASE NO. _____ TMS #: _____

CARRIER NAME: Fedex
BOL NOTE / SEAL NO: 7712 6505 2008

Order or Line No.	Packages No. & Type	Order Date	* HM	Identification Number (UN or NA), Proper Shipping Name, Hazard Class, Packing Group, per 172.101, 172.202, 172.303	Quantity	Item Wt.
	1 env.	8/14/20		Paperwork	1	1.26
				- Tony Ellison		
Total Wt.						1.26

Returnable Shipping Material (if applicable): _____ No. Pallets _____ Covers _____ Chip Boards: _____

* Mark "X" to designate Hazardous Materials as defined in DOT Regulations – provide proper identification, as applicable

24 Hour Emergency Response Contact: Chem Tel (Contract #MIS0001830) Telephone No. 1-888-255-3924

Shipper Certification

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled; and are in proper condition for transportation according to the applicable regulations of the U.S. Department of Transportation (DOT)

Per: Jacob [Signature] Date: 8.14.20

Carrier Certification

Carrier acknowledges receipt of packages and required placards, if applicable. Carrier certifies emergency response information was made available and/or carrier has the DOT emergency response guidebook or equivalent document in the vehicle.

Per: _____ Date: _____

Per: Jacob [Signature] Per: _____

If the shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign in the following manner: The carrier shall not make delivery of this shipment without payments of freight and all other lawful charges.

CROWN Cork & Seal Company USA, Inc. and Affiliates PER: _____

COPY DISTRIBUTION: ACCOUNTING: DELIVERY: SHEET NO: _____