



## AIR OPERATING PERMIT

Olympic Region Clean Air Agency  
2940 Limited Lane NW  
Olympia, WA 98502  
(360) 539-7610 or 1-800-422-5623

ISSUED IN ACCORDANCE WITH:  
40 CFR Part 70, Chapter 70.94 RCW, and Chapter 173-401 WAC

PERMIT NO: 15AOP1129

ISSUANCE DATE: September 1, 2016

EXPIRATION DATE: September 1, 2021

PERMITTEE & MAILING ADDRESS: Crown Cork & Seal Company, Inc.  
1202 Fones Road  
Olympia, WA 98501

FACILITY LOCATION: 1202 Fones Road  
Olympia, WA 98501

FACILITY DESCRIPTION: Aluminum beverage can manufacturer

ORCAA File #: 152

PRIMARY SIC: 3411

NAICS: 332431

PREPARED BY: Jennifer DeMay 9/1/16  
Jennifer A. DeMay, Engineer II

REVIEWED BY: Mark V. Goodin 9/1/16  
Mark V. Goodin, Professional Engineer

APPROVED BY: Francea L. McNair 9/1/16  
Francea L. McNair, Executive Director



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## I. ABBREVIATIONS AND DEFINITIONS

The following is a list of abbreviations used in this permit.

Administrator	EPA Region X Administrator
AOP	Air Operating Permit
AP-42	EPA Compilation of Emission Factors, AP-42, Fifth Edition, Volume I
AR#	Refers to a specific applicable requirement numbered “#”
ASTM	American Society for Testing and Materials
CFR	Code of Federal Regulations
CO	Carbon monoxide
Ecology	Washington State Department of Ecology
EPA	U.S. Environmental Protection Agency
FCAA	Federal Clean Air Act
G#	Refers to a specific general term or condition numbered “#”
grain/dscf	Concentration in terms of grains per dry standard cubic feet
HAP	Hazardous Air Pollutant
hp	Horsepower
M#	Refers to a specific monitoring term or condition numbered “#”
MACT	Maximum Achievable Control Technology
MMBtu/hr	Million British Thermal Units per hour
NESHAP	National Emission Standards for Hazardous Air Pollutants
NAICS	North American Industry Classification System
NOC	Notice of Construction
NO <sub>x</sub>	Oxides of Nitrogen
NSPS	New Source Performance Standards
NSR	New Source Review
O&M	Operations and Maintenance Plan
ORCAA	Olympic Region Clean Air Agency
P#	Refers to a specific permit term or provision numbered “#”
PM	Particulate matter air pollution
PM <sub>10</sub>	Particulate matter with aerodynamic diameter less than 10 microns
PM <sub>2.5</sub>	Particulate matter with aerodynamic diameter less than 2.5 microns
ppm	Parts per million by volume (assumed standard and dry)
PSD	Prevention of Signification Deterioration
PW#	Refers to a plant-wide applicable requirement numbered “#”
RACT	Reasonably Available Control Technology
R#	Refers to a specific reporting term or condition numbered “#”
RCW	Revised Code of Washington
REQ	Requirement
RICE	Reciprocating Internal Combustion Engine
SIC	Standard Industrial Classification
SO <sub>2</sub>	Sulfur dioxide
TAP	Toxic Air Pollutant as defined in Chapter 173-460 WAC
TPY	Tons per year
VOC	Volatile Organic Compounds
WAC	Washington Administrative Code
§	40 CFR

## II. Regulatory Basis

Pursuant to Chapter 173-401 Washington Administrative Code (WAC), Crown Cork and Seal Company, Inc. (Crown Cork & Seal) is authorized to operate the Crown Cork & Seal facility located at 1202 Fones Road in Olympia, Washington, in accordance with the terms and conditions listed in this permit.

The conditions in this permit contain the emission limitations, operating requirements, and monitoring, recordkeeping, and reporting requirements that apply to the facility. All terms and conditions of this permit, including any provisions designed to limit potential to emit, are enforceable under the Federal Clean Air Act (FCAA) unless specifically identified as not federally enforceable in the "regulatory basis" description that follows each condition. Conditions identified as "local only" are enforceable only by Olympic Region Clean Air Agency (ORCAA). Conditions identified as "state only" are enforceable only by the State of Washington. Conditions identified as "state/local only" are enforceable only by ORCAA and the State of Washington. Conditions identified as "local only" or "state/local only" are not federally enforceable.

The conditions in this permit contain abbreviated and in some cases paraphrased versions of the exact language of the applicable requirements from the underlying laws, regulations and regulatory orders. Any difference between the description of an applicable requirement in this permit compared to the corresponding law, regulation or order is provided for purposes of clarifying the underlying requirement. The legal requirement remains the underlying applicable requirement cited in the "Applicable Requirement" column of the tables and the citations contained in brackets at the end of each requirement. Any perceived conflicts between the permit and an underlying applicable requirement will be resolved by referring to the cited applicable requirement.

Unless otherwise stated, terms used in the conditions of this permit shall be defined consistent with their definitions from the corresponding referenced regulations. If not defined in the referenced regulations, terms shall be defined consistent with the definitions contained in Chapter 70.94 RCW, WAC 173-401-200, WAC 173-400-030, and ORCAA Rule 1.4. Terms not defined in this permit or by applicable regulation shall be defined consistent with the Merriam-Webster's Collegiate Dictionary, Tenth Edition copyright © 2003 by Merriam-Webster Inc.

Unless otherwise stated, the versions of the referenced laws, regulations and orders cited in this permit are the versions that were in effect on the date this permit was issued.

*[END OF SECTION]*

### III. EMISSION UNIT (EU) IDENTIFICATION

The following emissions units are covered under this permit.

**Table 1: Emissions Units Covered Under Permit**

Emission Unit ID#	Description	Controls	Effective NSR Permits
EU1	<b>Line B Can Washer (primary)</b> <ul style="list-style-type: none"> <li>▪ Cincinnati Industrial Machinery (CIM) Model #BS1122422-88 C40-2</li> <li>▪ 5000 cans per minute</li> </ul>	Can washing solution limitations	08NOC622
EU2	<b>Line B Can Washer Natural Gas-Fired Dryer</b> <ul style="list-style-type: none"> <li>▪ Eclipse 440 AH dryer</li> <li>▪ 2 Natural gas-fired burners</li> <li>▪ 8.8 MMBtu/hr maximum heat input</li> </ul>	None	08NOC622
EU3	<b>Line A Washer (backup)</b> <ul style="list-style-type: none"> <li>▪ Cincinnati Industrial Machinery (CIM) Model BS112528 C87</li> <li>▪ 4000 cans per minute</li> <li>▪ Integrated 7.2 MMBtu/hr natural gas-fired dryer</li> </ul>	Can washing solution limitations	95NOC641 00NOC027
EU4	<b>Rim Coater with UV Cure</b> <ul style="list-style-type: none"> <li>▪ U.V. Fusion U.V. System Model DRR-120</li> </ul>	<ul style="list-style-type: none"> <li>▪ Use of 40 CFR Part 60 Subpart WW-compliant coatings and low-VOC coatings.</li> <li>▪ Use of UV curing.</li> </ul>	98NOC021
EU5	<b>Solvent Cleaning</b> <ul style="list-style-type: none"> <li>▪ Parts Washers (isopropanol)</li> <li>▪ Hand cleaning of decorator units (isopropanol)</li> <li>▪ Machine/Millwright shops (naphtha)</li> </ul>	Pollution prevention	None – NSR never triggered
EU6	<b>Diesel Emergency Fire Pump Engine</b> <ul style="list-style-type: none"> <li>▪ Clarke Model JUGH-UFG8</li> <li>▪ 149 hp, 9.5 gal/hr</li> </ul>	None	None – NSR never triggered
<b>CAN COATING LINE 1</b>			
EU7	<b>Line 1 Decorator Unit</b> <ul style="list-style-type: none"> <li>▪ Concord Decorator-Alcoa Serial # D3008</li> </ul>	<ul style="list-style-type: none"> <li>▪ Use of low-VOC inks.</li> <li>▪ Use of low-VOC, 40 CFR Part 60 Subpart WW-compliant over-varnish.</li> <li>▪ Roll on application.</li> </ul>	98NOC021

<b>Emission Unit ID#</b>	<b>Description</b>	<b>Controls</b>	<b>Effective NSR Permits</b>
EU8	<b>Line 1 Printer Oven (PIN)</b> <ul style="list-style-type: none"> <li>▪ OSI Model# 1600-CPM SINGLE ZONE</li> <li>▪ 2 Natural gas-fired burners</li> <li>▪ 5 MMBtu/hr maximum heat input</li> </ul>	None	98NOC021
EU9	<b>Line 1 Lacquer Spray Machines (LSM)</b> <ul style="list-style-type: none"> <li>▪ Fisher Model 102MSH MARK3</li> <li>▪ 7 units @ 350 cans per minute</li> </ul>	<ul style="list-style-type: none"> <li>▪ Use of 40 CFR Part 60 Subpart WW-compliant coatings.</li> <li>▪ Filtered to capture overspray.</li> </ul>	98NOC021 00NOC034
EU10	<b>Line 1 Internal Bake Oven (IBO)</b> <ul style="list-style-type: none"> <li>▪ FECO Serial# 15241</li> <li>▪ 2 Natural gas-fired burners</li> <li>▪ 5.2 MMBtu/hr maximum heat input</li> </ul>	None	None – NSR never triggered
<b>CAN COATING LINE 2</b>			
EU11	<b>Line 2 Decorator Unit</b> <ul style="list-style-type: none"> <li>▪ Concord Decorator-Alcoa Serial# 307301</li> </ul>	<ul style="list-style-type: none"> <li>▪ Use of low-VOC inks.</li> <li>▪ Use of low-VOC, 40 CFR Part 60 Subpart WW-compliant over-varnish.</li> <li>▪ Roll on application.</li> </ul>	98NOC021
EU12	<b>Line 2 Printer Oven (PIN)</b> <ul style="list-style-type: none"> <li>▪ OSI Model# R.H. Sigma / Serial #6882</li> <li>▪ 2 Natural gas-fired burners</li> <li>▪ 3 MMBtu/hr maximum heat input</li> </ul>	None	98NOC021
EU13	<b>Line 2 Lacquer Spray Machines (LSM)</b> <ul style="list-style-type: none"> <li>▪ Fisher Model 102MSH MARK3</li> <li>▪ 7 units @ 350 cans per minute</li> </ul>	<ul style="list-style-type: none"> <li>▪ Use of 40 CFR Part 60 Subpart WW-compliant coatings.</li> <li>▪ Filtered to capture overspray.</li> </ul>	98NOC021 00NOC034
EU14	<b>Line 2 Internal Bake Oven (IBO)</b> <ul style="list-style-type: none"> <li>▪ Ross Serial# LWD429-165</li> <li>▪ 2 Natural gas-fired burners</li> <li>▪ 5.2 MMBtu/hr maximum heat input</li> </ul>	None	None – NSR never triggered

**Note:** The information in Table 1 is for purposes of description only and is not intended as a limitation.

*[END OF SECTION]*

#### IV. PERMIT ADMINISTRATION (P)

Permit administration terms and provisions govern administration of the permit and include AOP administrative and other requirements that have no ongoing compliance monitoring requirements. The permittee must comply with the requirements listed below, and must certify compliance annually. Unless the text of the term is specifically identified to be directly enforceable, the language of the cited applicable requirement takes precedence.

**P1. Permit Duration.** This permit is issued for a fixed term of 5 years from date of issuance.  
*[WAC 173-401-610]*

**P2. Federally Enforceable Requirements.**

- a) All terms and conditions in this air operating permit, including any provision designed to limit potential to emit, are enforceable by the Administrator and citizens under the FCAA, except as indicated in b) below.
- b) Notwithstanding subsection (a) of this condition, any terms and conditions included in this permit that are not required under the FCAA or under any of its applicable requirements are specifically designated as “state” or “local” only, and are not federally enforceable under the FCAA. Terms and conditions so designated are not subject to the requirements of WAC 173-401-810 and 820.

*[WAC 173-401-625]*

**P3. Compliance Maintenance.** The permittee shall maintain compliance with all applicable requirements with which the source was in compliance as of the date of permit issuance. The permittee shall meet on a timely basis any applicable requirements that become effective during the permit term.

*[WAC 173-401-630(3); WAC 173-401-510(2)(h)(iii)]*

**P4. Standard Conditions:**

- a) **Duty to comply.** The permittee shall comply with all conditions of this permit. Any permit noncompliance constitutes a violation of Chapter 70.94 RCW and, for federally enforceable provisions, a violation of the FCAA. Such violations are grounds for enforcement action; for permit termination, revocation and re-issuance, or modification; or for denial of a permit renewal application.
- b) **Need to Halt or Reduce Activity Not a Defense.** 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.
- c) **Permit Actions.** This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and re-issuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
- d) **Property Rights.** This permit does not convey property rights of any sort, or any

exclusive privilege.

- e) **Duty to Provide Information.** The permittee shall furnish to ORCAA, within a reasonable time, any information that ORCAA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine compliance with the permit. Upon request, the permittee shall also furnish to ORCAA copies of records that the permittee is required to keep by this permit, or for information claimed to be confidential, the permittee may furnish such records directly to ORCAA along with a claim of confidentiality per Condition P15. Permitting authorities shall maintain confidentiality of such information in accordance with RCW 70.94.205.
- f) **Annual Fees.** The permittee shall pay an annual permit fee as a condition of this permit in accordance with ORCAA's fee schedule contained in ORCAA Rule 3.2. Failure to pay fees in a timely fashion shall subject the permittee to civil and criminal penalties as prescribed in Chapter 70.94 RCW.
- g) **Emission Trading.** No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in the permit.
- h) **Severability.** If any provision of this permit is to be held invalid, all unaffected provisions of the permit shall remain in effect and enforceable.
- i) **Permit Appeals.** This permit or any conditions in it may be appealed only by filing an appeal with the Washington State Pollution Control Hearings Board and serving it on ORCAA within thirty days from receiving the permit pursuant to RCW 43.21B.310. This provision for appeal in this section is separate from and additional to any federal rights to petition and review under §505(b) of the FCAA.
- j) **Permit continuation.** This permit and all terms and conditions contained therein, including any permit shield provided under WAC 173-401-640, shall not expire until the renewal permit has been issued or denied if a timely and complete application has been submitted. An application shield granted pursuant to WAC 173-401-705(2) shall remain in effect until the renewal permit has been issued or denied if a timely and complete application has been submitted. This protection shall cease to apply if, subsequent to a completeness determination, the applicant fails to submit by the deadline specified in writing by ORCAA any additional information identified as being needed to process the application.

*[WAC 173-401-620(2); a) §63.4(a)(1); §63.4(a)(2) ]*

**P5. Duty to Supplement or Correct Application.** The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information.

*[WAC 173-401-500(6)]*

**P6. False or Misleading Statements.** No person shall willfully make a false or misleading statement to ORCAA as to any matter within the jurisdiction of ORCAA. No person shall make any false material statement, representation or certification in any form, notice or report required under chapter 70.94 or 70.120 RCW, or any ordinance, resolution, regulation, permit



or order in force pursuant thereto.

*[State/Local only: WAC 173-400-105(6); Local only: ORCAA 7.2]*

**P7. Permit Renewal Application.** The permittee shall submit a complete renewal application to ORCAA at least 12 months, but no more than 18 months, prior to the expiration date of this permit.

*[WAC 173-401-710(1)]*

**P8. Permit Expiration – Application Shield.** Permit expiration terminates the permittee’s right to operate unless a timely and complete renewal application has been submitted consistent with Condition P7. All terms and conditions of the permit shall remain in effect after the permit itself expires if a timely and complete permit application has been submitted.

*[WAC 173-401-710(3)]*

**P9. Permit Revocation.** The permitting authority may revoke a permit only upon the request of the permittee or for cause. The permitting authority shall provide at least thirty days written notice to the holder of a current operating permit prior to revocation of the permit or denial of a permit renewal application. Such notice shall include an explanation of the basis for the proposed action and afford the permittee/applicant an opportunity to meet with the permitting authority prior to the authority's final decision. A revocation issued under this section may be issued conditionally with a future effective date and may specify that the revocation will not take effect if the permittee satisfies the specified conditions before the effective date.

*[WAC 173-401-710(4)]*

**P10. Reopening for Cause.** The permit shall be reopened and revised under any of the following circumstances:

- a) Additional requirements become applicable to the source with a remaining permit term of three or more years. Such a reopening shall be completed not later than eighteen months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions have been extended pursuant to WAC 173-401-620(2)(j);
- b) Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit;
- c) ORCAA or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit; or
- d) ORCAA or the Administrator determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

Proceedings to reopen and issue this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists.

Reopenings under this section shall not be initiated before a notice of such intent is provided to the permittee by the permitting authority. Such notice shall be made at least 30 days in advance of the date that the permit is to be reopened, except that the permitting authority may provide a shorter time period in the case of an emergency.

*[WAC 173-401-730]*

**P11. Changes not Requiring Permit Revision/Off Permit Changes.** The permittee may make the changes described in WAC 173-401-722 and WAC 173-401-724 without revising this permit, provided that the changes satisfy the criteria set forth in those sections, including the requirements to notify ORCAA and EPA.

*[WAC 173-401-722; WAC 173-401-724]*

**P12. Administrative Permit Amendments.** The permittee may request an "administrative permit amendment" for the following types of permit revisions:

- a) Correction of typographical errors;
- b) Change the name, address, or phone number of any person identified in the permit, or provide a similar minor administrative change at the source;
- c) Require more frequent monitoring or reporting by the permittee;
- d) Allow for a change in ownership or operational control of a source where the permitting authority determines that no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new permittee has been submitted to the permitting authority; and,
- e) Incorporate into the chapter 401 permit the terms, conditions, and provisions from orders approving NOC applications processed under an EPA-approved program.

Application and approval of administrative permit amendment applications shall conform to the procedures in WAC 173-401-720.

*[WAC 173-401-720]*

**P13. Permit Modifications.** Permit revisions that cannot be accomplished using the provisions for administrative permit amendments shall be applied for and approved as a permit modification according to WAC 173-401-725.

*[WAC 173-401-725]*

**P14. Greenhouse Gas Reporting Fee.** The Permittee must pay a greenhouse gas (GHG) reporting fee for each year they submit a GHG report to Ecology. Fees will be paid according to Ecology's fee schedule. Fees must be paid within sixty days of receipt of Ecology's billing statement.

*[State Only: WAC 173-441-110]*

**P15. Confidential Information.** The permittee is responsible for certifying and clearly identifying any information considered proprietary and confidential. In the case where a permittee has submitted information to ORCAA under a claim of confidentiality, ORCAA may

also require the permittee to submit a copy of such information directly to the administrator. The permittee is responsible for clearly identifying information that is considered proprietary and confidential prior to submittal to ORCAA. In addition, all confidential information shall be submitted according to ORCAA's Public Records and Confidentiality Procedures.

*[WAC 173-401-500(5); Local only: ORCAA Rule 1.6; WAC 173-401-630(1)]*

**P16. Credible Evidence.** For purposes of certifying compliance or establishing whether or not the permittee has violated or is in violation of this permit, nothing shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether a source would have been in compliance with the requirements if the appropriate performance or compliance test or procedure had been performed.

*[40 CFR 51.212; 40 CFR 52.12; 40 CFR 52.33; 40 CFR 60.11(g); 40 CFR 61.12]*

**P17. Emergency as Affirmative Defense.** An emergency, as defined in WAC 173-401-645(1), constitutes an affirmative defense to an action brought for non-compliance with a technology-based emission limitation provided the criteria and procedures of WAC 173-401-645(3) are met. This provision is in addition to the affirmative defense for unavoidable excess emissions found in WAC 173-400-107. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that demonstrates:

- a) An emergency occurred and that the permittee can identify the cause(s) of the emergency;
- b) The permitted facility was at the time being properly operated;
- c) During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
- d) The permittee submitted notice of the emergency to ORCAA within two working days of the time when emission limitations were exceeded due to the emergency or shorter periods of time specified in an applicable requirement. This notice fulfills the requirement of WAC 173-401-615(3)(b) unless the excess emissions represent a potential threat to human health or safety. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

*[WAC 173-401-645]*

**P18. Unavoidable Excess Emissions Excused.** Excess emissions due to startup, shutdown, scheduled maintenance or upset conditions that are determined by ORCAA to be unavoidable under the procedures and criteria in WAC 173-400-107 and ORCAA Rule 8.7, shall be excused and not subject to penalty. The permittee shall have the burden of proving to ORCAA that excess emissions were unavoidable. Excess emissions may qualify for consideration as unavoidable excess emissions provided the permittee includes in the permit deviation report required by condition R5(c) of this permit, information that demonstrates:

- a) The event was not caused by poor or inadequate design, operation, maintenance, or any other reasonably preventable condition;

- b) The event was not of a recurring pattern indicative of inadequate design, operation, or maintenance; and,
- c) The operator took immediate and appropriate corrective action in a manner consistent with good air pollution control practice for minimizing emissions during the event, taking into account the total emissions impact of the corrective action, including slowing or shutting down the emissions unit as necessary to minimize emissions, when the operator knew or should have known that an emission standard or permit condition was being exceeded.

*[WAC 173-400-107(6); Local Only: ORCAA 8.7(c)]*

**P19. Certification.** All documents required to be submitted by this permit shall contain certification by a responsible official of truth, accuracy, and completeness. Documents include any application form, report, or compliance certification including but not limited to test plans and results, monitoring plans and results, applications, emissions inventory submittals, equipment malfunction reports or annual compliance certification. Such certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

*[WAC 173-401-520; WAC 173-401-615(3)(a); WAC 173-401-630(1); §63.2520(e)(2)]*

*[END OF SECTION]*

## V. GENERAL TERMS AND CONDITIONS (G)

**G1. Inspection and Entry.** Upon presentation of appropriate credentials, the permittee shall allow a representative from ORCAA or an authorized representative to perform the following:

- a) Enter upon the premises where a Chapter 401 source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- b) Have access to and copy at reasonable times any records that must be kept under the conditions of this permit;
- c) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
- d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or other applicable requirements.
- e) Nothing in this condition or permit shall limit the ability of EPA to inspect or enter the premises of the permittee under Section 114 or other provisions of the Federal Clean Air Act.

*[WAC 173-401-630(2)]*

**G2. Access for Inspection.** No person shall refuse entry or access to an ORCAA representative who requests entry for the purpose of inspection, and who presents appropriate credentials; nor shall any person obstruct, hamper or interfere with any such inspection.

*[Local Only: ORCAA 1.5(e)]*

**G3. Insignificant Emission Units.** The following applies to emissions units determined insignificant based on actual emissions in accordance with WAC 173-401-530(1)(a):

- a) Any emission unit or activity that qualifies as insignificant solely on the basis of provisions in WAC 173-401-530(1)(a) shall not exceed the emission thresholds specified in WAC 173-401-530(4) until this permit is modified pursuant to Condition P13.
- b) Upon request from the permitting authority the permittee must provide sufficient documentation to enable the permitting authority to determine that the emission unit or activity has been appropriately listed as insignificant.
- c) Upon request from the permitting authority, at any time during the term of the permit, the permittee shall demonstrate to the permitting authority that the actual emissions of any unit or activity claimed insignificant on the basis of actual emissions are below the emission thresholds listed in WAC 173-401-530(4).

*[WAC 173-401-530]*

**G4. New Source Review.** Prior to commencing any new installation, replacement, modification or alteration of any stationary source, emission unit, area source or fugitive source, the permittee shall secure all necessary approvals under Rule 6.1 of ORCAA Regulations.

*[Local Only: ORCAA 6.1]*

**G5. Replacement or Substantial Alteration of Existing Control Equipment.** Prior to commencing replacement or substantial alteration of existing control equipment, the permittee shall secure all necessary approvals under Rule 6.1 of ORCAA Regulations.

*[Local Only: ORCAA 6.1.10]*

**G6. Temporary Sources.** The permittee may operate portable air contaminant sources at temporary locations within the facility subject to this permit provided that the permittee has complied with the requirements for temporary portable sources under ORCAA Rule 6.1.1.

*[WAC 173-401-635; ORCAA 6.1.1]*

**G7. Demolition and Asbestos Projects.** The permittee shall comply with the notification and approval requirements in Rule 6.3 of ORCAA Regulations prior to commencing any asbestos, renovation, or demolition project at the facility as defined in ORCAA Rule 6.3.1. The permittee shall conduct all renovation, demolition and asbestos projects in accordance with applicable asbestos control standards and requirements in ORCAA Rule 6.3.

*[Local Only: ORCAA 6.3.2]*

**G8. Demolition and Renovation Projects.** The permittee shall notify ORCAA prior to commencing any renovation or demolition activities at the facility as defined in 40 CFR 61.141. The permittee shall conduct all renovation, demolition and asbestos projects in accordance with applicable asbestos control standards and requirements in Subpart M of 40 CFR Part 61.

*[40 CFR Part 61, Subpart M]*

**G9. Protection of Stratospheric Ozone.** The permittee shall comply with the standards for recycling and emissions reduction as provided in 40 CFR Part 82, Subparts B and F.

*[40 CFR Part 82, Subparts B & F]*

**G10. Prohibition of Emissions Detrimental to Persons or Property.** No person shall cause or permit the emission of any air contaminant from any source if it is detrimental to the health, safety, or welfare of any person, or causes damage to property or business.

*[State/Local Only: WAC 173-400-040(6); Local Only: ORCAA 7.6]*

**G11. Concealment and Masking Prohibited:**

- a) No person shall cause or allow the installation or use of any device or use of any means, which conceals or masks an emission of air contaminant, which would otherwise violate any provisions of ORCAA's Regulations, chapter 173-400 WAC, 40 CFR Part 60, or 40 CFR Part 63.
- b) No person shall cause or allow the installation or use of any device or use of any means designed to conceal or mask the emission of an air contaminant, which causes detriment to health, safety, or welfare of any person, or cause damage to property or business.
- c) Such concealment includes, but is not limited to—

- i) The use of diluents to achieve compliance with a relevant standard based on the concentration of a pollutant in the effluent discharged to the atmosphere;
- ii) The use of gaseous diluents to achieve compliance with a relevant standard for visible emissions.

*[State/Local Only: WAC 173-400-040(8); Local Only: ORCAA 7.5; §60.12; §63.4(b)]*

*[END OF SECTION]*

## VI. Applicable Requirements

### *Plant-wide (PW) Applicable Requirements*

REQ #	Applicable Requirement Citations	Applicable Requirement Description (for information purposes only)	Reference Method (if applicable)	Required Monitoring Provisions
PW1	WAC 173-400-040(3) <i>(state/local only)</i> ORCAA 8.3(e) <i>(local only)</i>	<b>Fallout.</b> No person shall cause or permit the emission of particulate matter from any source to be deposited beyond the property under direct control of the owner(s) or operator(s) of the source in sufficient quantity to interfere unreasonably with the use and enjoyment of the property upon which the material is deposited.	None	M4
PW2	WAC 173-400-040(5) <i>(state/local only)</i>	<b>Odor Control (State).</b> Any person who shall cause or allow the generation of any odor from any source which may unreasonably interfere with any other property owner's use and enjoyment of his or her property must use recognized good practice and procedures to reduce these odors to a reasonable minimum.	None	M4
PW3	ORCAA 8.5 <i>(local only)</i>	<b>Odor Control (ORCAA).</b> Reasonably available control technology (RACT) shall be installed and operated to mitigate odor-bearing gases emitted into the atmosphere to a minimum, or, so as not to create air pollution. No person shall cause or allow the emission or generation of any odor from any source that unreasonably interferes with another person's use and enjoyment of their property.	None	M4



Applicable Plant-wide Requirements continued

REQ #	Applicable Requirement Citations	Applicable Requirement Description (for information purposes only)	Reference Method (if applicable)	Required Monitoring Provisions
PW4	<p>WAC 173-400-040(4)(a)</p> <p>WAC 173-401-600(1) and (2)</p>	<p><b>Fugitive Emissions Control.</b> The owner or operator of any emission unit engaging in materials handling, construction, demolition or any other operation which is a source of fugitive emissions shall take reasonable precautions to prevent release of air contaminants from the operation.</p> <p><b>Provisions added for clarification under authority of WAC 173-401-600(1) and (2):</b> The permittee shall devise and implement a fugitive emissions control plan for preventing fugitive releases of air contaminants. The plan shall be documented in writing and made available to ORCAA upon request. The plan shall identify reasonable and appropriate precautions for preventing fugitive emissions from the facility, which, at a minimum, shall include:</p> <ul style="list-style-type: none"> <li>a) Storing volatile materials in covered containers.</li> <li>b) Storing all solvents or solvent-containing cloth or other material used for cleaning in closed containers.</li> <li>c) Daily inspecting liquid organic material transfer systems and storage tanks for noticeable liquid leaks or fumes.</li> <li>d) Making repairs to fix any detected leak as soon as possible, but no longer than 12-hours from discovering the leak.</li> <li>e) Cleaning up any spills of materials containing VOC immediately upon discovering the spill according to the permittee's spill response plan.</li> <li>f) Preventing fugitive emissions from roll-up doors and other exterior doors.</li> </ul>	None	M5

Applicable Plant-wide Requirements continued

REQ #	Applicable Requirement Citations	Applicable Requirement Description (for information purposes only)	Reference Method (if applicable)	Required Monitoring Provisions
PW5	WAC 173-400-040(9)(a) <i>(state/local only)</i> ORCAA 8.3(c) <i>(local only)</i>	<p><b>Fugitive Dust Control.</b> Reasonable and/or appropriate precautions shall be taken to prevent fugitive particulate material from becoming airborne:</p> <ul style="list-style-type: none"> <li>a) When handling, loading, unloading, transporting, or storing particulate material;</li> <li>b) When constructing, altering, repairing or demolishing a building, or its appurtenance, or a road; or</li> <li>c) From an untreated open area.</li> </ul> <p><b>Clarification added:</b> For the purpose of this requirement, fugitive particulate means particulate material which is generated incidental to an operation, process or procedure and is emitted into the open air from points other than an opening designed for emissions such as a stack or vent.</p>	None	M5
PW6	ORCAA 8.8 <i>(local only)</i>	<p><b>Maintenance and Repair of Air Pollution Control Equipment and Processes.</b> All air contaminant sources are required to keep any process and/or air pollution control equipment in good operating condition and repair.</p>	None	no specific plant-wide monitoring required
PW7	WAC 173-400-040(2) ORCAA 8.2 <i>(state/local only)</i>	<p><b>General Standards for Maximum Visual Emissions.</b></p> <ul style="list-style-type: none"> <li>(a) In equipment or facilities, regardless of their date of installation, no person shall cause or allow the emission to the outdoor atmosphere, for more than three (3) minutes in any one hour, of a gas stream containing air contaminants which are greater than 20% opacity.</li> <li>(b) Observations shall be made by trained and certified observers or by LIDAR instrumentation.</li> <li>(c) The exception to the opacity standard stated in (a) above are as follows:</li> </ul>	Ecology Method 9A	M1 M2 M3

Applicable Plant-wide Requirements continued

REQ #	Applicable Requirement Citations	Applicable Requirement Description (for information purposes only)	Reference Method (if applicable)	Required Monitoring Provisions
		<ul style="list-style-type: none"> <li>i. Emissions occurring due to soot blowing or grate cleaning may be greater than 20% opacity; providing the operator can demonstrate that soot blowing or grate cleaning will not exceed a total of 15 minutes in any consecutive 8 hours. This practice, except for testing and troubleshooting, is to be scheduled for the same approximate times each day and ORCAA shall be advised of the schedule.</li> <li>ii. When the owner or operator of a source supplies valid data to show that the presence of uncombined water is the only reason for the opacity to exceed 20%.</li> </ul>		
PW8	WAC 173-400-040(7)	<b>Sulfur Dioxide.</b> WAC 173-400-040(7) prohibits emission of a gas containing sulfur dioxide from any emission unit in excess of 1000 ppm of sulfur dioxide on a dry basis, corrected to 7% oxygen for combustion sources, and based on the average of any period of 60 consecutive minutes in accordance with the reference test method.	EPA Method 6, 6A, 6B, or 6C	no specific plant-wide monitoring required
PW9	WAC 173-400-050(1)	<b>General Particulate Standards for Combustion Units (State).</b> No person shall cause or permit the emissions of particulate matter in excess of 0.23 gram per dry cubic meter at standard conditions (0.1 grain/dscf). No person shall allow or permit the emission of particulate matter in excess of 0.46 gram per dry cubic meter at standard conditions (0.2 grain/dscf), as measured by EPA Method 5 in Appendix A to 40 CFR Part 60.	EPA Method 5 of 40 CFR Part 60, Appendix A	M7
PW10	ORCAA 8.3(a) (local only)	<b>General Particulate Standards for Combustion Units (ORCAA).</b> No person shall cause or allow the emissions of particulate matter to the outdoor atmosphere from any single source in excess of 0.10 grains per standard cubic foot of gas (calculated at 7% oxygen). Measured concentrations shall be adjusted for volumes corrected to 7% oxygen,	EPA Method 5 and 202 of 40 CFR Part 60, Appendix A	M7

Applicable Plant-wide Requirements continued

REQ #	Applicable Requirement Citations	Applicable Requirement Description (for information purposes only)	Reference Method (if applicable)	Required Monitoring Provisions
		except when ORCAA determines that an alternate oxygen correction factor is more representative of normal operations. In addition, ORCAA requires including the “back half” condensable particulate matter for determining compliance with ORCAA 8.3(a) in accordance with Methods 5 and 202.		
PW11	WAC 173-400-060	<b>General Emission Standards for Process Units.</b> No person shall cause or permit the emission of particulate material from any general process operation in excess of 0.23 grams per dry cubic meter at standard conditions (0.1 grain/dscf) of exhaust gas as measured by EPA Methods 5 and 202.	EPA Method 5 of 40 CFR Part 60 Appendix A and EPA Method 202 of 40 CFR Part 51 Appendix M	M7
PW12	00MOD063 Condition #1	<b>Facility-Wide VOC Emission Limit:</b> Facility-wide emissions of volatile organic compounds (VOC) shall not exceed 249 tons per consecutive twelve-month period.	None	M9 M10
PW13	05NOC420 Condition 1	<b>Facility-Wide HAP Emission Limit:</b> Facility-wide emissions of hazardous air pollutants (HAPs) which have been listed pursuant to Section 112(b) of the Federal Clean Air Act (HAPs) shall be less than 9.9 tons of any single HAP, and shall be less than 24.9 tons of all combined HAPs, during any 12 consecutive months after the date of this Order of Approval.	None	M9 M11 M12

Applicable Plant-wide Requirements continued

REQ #	Applicable Requirement Citations	Applicable Requirement Description (for information purposes only)	Reference Method (if applicable)	Required Monitoring Provisions
PW14	95NOC641 Condition 2;  00NOC027 Condition 1;  08NOC622 Condition 2	<p><b>Can Washer Solution Requirements:</b> The owner or operator shall limit the consumption of sulfuric acid and hydrofluoric acid used to formulate the can washer solution as follows:</p> <ul style="list-style-type: none"> <li>a) The total cumulative use of low concentration sulfuric acid used to formulate the can washing solution shall not exceed 50,000 gallons per consecutive 12-month period;</li> <li>b) The low concentration sulfuric acid shall contain no more than 60 percent sulfuric acid by weight;</li> <li>c) Total cumulative use of the hydrogen fluoride used to formulate the can washing solution shall not exceed 24,000 gallons per consecutive 12-month period;</li> <li>d) Percent by weight of hydrogen fluoride in the hydrofluoric acid used to formulate the can washing solution shall not exceed 40 percent by weight; and</li> <li>e) The total cumulative use of high concentration sulfuric acid (sulfuric acid with a concentration of greater than 60% by weight) used to formulate the can washing solution shall not exceed 5,000 gallons in any consecutive 12-month period.</li> </ul>	None	M13

**EU1 Line B Can Washer (AR1) Applicable Requirements**

REQ #	Applicable Requirement Citations	Applicable Requirement Description (for information purposes only)	Reference Method (if applicable)	Required Monitoring Provisions
AR1.1	08NOC622 Condition 5	<b>Can Washer O&amp;M:</b> An Operation and Maintenance (O&M) Plan that includes procedures specific to operation and maintenance of the Line B can washer shall be devised and kept on site.	None	Recordkeeping only (RK13)

**EU2 Line B Can Washer Natural Gas-Fired Dryer (AR2) Applicable Requirements**

REQ #	Applicable Requirement Citations	Applicable Requirement Description (for information purposes only)	Reference Method (if applicable)	Required Monitoring Provisions
AR2.1	08NOC622 Condition 5	<b>Can Washer O&amp;M:</b> An Operation and Maintenance (O&M) Plan that includes procedures specific to operation and maintenance of the Line B can washer shall be devised and kept on site.	None	Recordkeeping only (RK13)
AR2.2	ORCAA 8.8 (local only)	<b>Maintenance and Repair of Air Pollution Control Equipment and Processes.</b> All air contaminant sources are required to keep any process and/or air pollution control equipment in good operating condition and repair.	None	M1 M8

**EU3 Line A Can Washer (AR3) Applicable Requirements**

REQ #	Applicable Requirement Citations	Applicable Requirement Description (for information purposes only)	Reference Method (if applicable)	Required Monitoring Provisions
AR3.1	ORCAA 8.8 (local only)	<b>Maintenance and Repair of Air Pollution Control Equipment and Processes.</b> All air contaminant sources are required to keep any process and/or air pollution control equipment in good operating condition and repair.	None	M1 M8

**EU4 Rim Coater with UV Cure (AR4) Applicable Requirements**

REQ #	Applicable Requirement Citations	Applicable Requirement Description (for information purposes only)	Reference Method (if applicable)	Required Monitoring Provisions
AR4.1	Subpart WW Emission Standards 40 CFR 60.492; 98NOC021 Condition 2	<b>Applicable Subpart WW Emission Standards:</b> The permittee shall not discharge nor cause the discharge of VOC emissions to the atmosphere that exceed the following volume weighted calendar-month average emissions: a) 0.46 kilogram of VOC per liter of coating solids from each over-varnish coating operation.	Reference Method 24 or material formulation data supplied by the manufacturer, and the calculation procedures as specified in §60.493(b)(1).	M14
AR4.2	Subpart A Operations and Maintenance Requirements 40 CFR 60.11 (d)	<b>Operations and Maintenance Requirement:</b> At all times, including periods of startup, shutdown, and malfunction, the Permittee shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the EPA Administrator and ORCAA which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.	None	M8

**EU5 Solvent Cleaning (AR5) Applicable Requirements**

REQ #	Applicable Requirement Citations	Applicable Requirement Description (for information purposes only)	Reference Method (if applicable)	Required Monitoring Provisions
N/A	<b>Solvent Cleaning (EU5) is subject to plant-wide applicable requirements only.</b>			

**EU6 Emergency Fire Pump Engine (AR6) Applicable Requirements**

REQ #	Applicable Requirement Citations	Applicable Requirement Description (for information purposes only)	Reference Method (if applicable)	Required Monitoring Provisions
AR6.1	40 CFR Part 63 Subpart ZZZZ §63.6595; §63.6603; §63.6603 Table 2d	<p><b>Subpart ZZZZ Management Practice Requirements:</b> You must comply with the following requirements:</p> <ul style="list-style-type: none"> <li>a) Change oil and filter every 500 hours of operation or annually, whichever comes first;</li> <li>b) Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first; and</li> <li>c) Inspect all hoses and belts, every 500 hours of operation or annually, whichever comes first, and replace as necessary.</li> </ul> <p>If an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the management practice requirements or if performing the management practice on the required schedule would otherwise pose an unacceptable risk under Federal, State, or local law, the management practice can be delayed until the emergency is over or the unacceptable risk has abated. The management practice shall be performed as soon as practicable after the emergency has ended or the unacceptable risk has abated.</p>	NA	Recordkeeping only (RK16)
AR6.2	40 CFR Part 63 Subpart ZZZZ §63.6595; §63.6625(i)	<p><b>Subpart ZZZZ Optional Oil Analysis Program:</b> You have the option to use an oil analysis program in order to extend the specified oil change requirement in Condition 5.3a. The oil analysis must be performed every 500 hours of operation or annually, whichever comes first. The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity</p>	NA	Recordkeeping only (RK16)



REQ #	Applicable Requirement Citations	Applicable Requirement Description (for information purposes only)	Reference Method (if applicable)	Required Monitoring Provisions
		of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil before continuing to use the engine. The analysis program must be part of the maintenance plan for the engine.		
AR6.3	40 CFR Part 63 Subpart ZZZZ §63.6595; §63.6605(b); §63.6625(e)	<b>Subpart ZZZZ Operation and Maintenance Requirements:</b> At all times you must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.	None	M1
AR6.4	40 CFR Part 63 Subpart ZZZZ §63.6595; §63.6625(e); §63.6640(a); §63.6640(a) Table 6.9; §63.6625(i)	<b>Subpart ZZZZ Maintenance Plan:</b> You must operate and maintain the stationary reciprocating internal combustion engine according to the manufacturer's emission-related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. If you use the optional oil analysis program in Condition 5.3b, the analysis program must be part of this maintenance plan.	None	Recordkeeping only (RK16)

REQ #	Applicable Requirement Citations	Applicable Requirement Description (for information purposes only)	Reference Method (if applicable)	Required Monitoring Provisions
AR6.5	40 CFR Part 63 Subpart ZZZZ §63.6595; §63.6625(f)	<b>Subpart ZZZZ Equipment Requirement:</b> You must install a non-resettable hour meter if one is not already installed.	NA	None
AR6.6	40 CFR Part 63 Subpart ZZZZ §63.6595; §63.6625(h)	<b>Subpart ZZZZ Startup Requirements:</b> You must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.	None	Recordkeeping only (RK16)
AR6.7	40 CFR Part 63 Subpart ZZZZ §63.6595; §63.6640(f)	<p><b>Subpart ZZZZ Operating Limitations:</b> Any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, is prohibited. There is no time limit on the use of emergency stationary RICE in emergency situations.</p> <ul style="list-style-type: none"> <li>a) You may operate your emergency stationary RICE for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing of such units is limited to 100 hours per year.</li> <li>b) You may operate your emergency stationary RICE up to 50 hours per year in non-emergency situations, but those 50 hours are counted towards the 100 hours per year provided for maintenance and testing. The 50 hours per year for non-emergency situations must comply with the requirements of §63.6640(f)(4).</li> </ul>	None	Recordkeeping only (RK16)

REQ #	Applicable Requirement Citations	Applicable Requirement Description (for information purposes only)	Reference Method (if applicable)	Required Monitoring Provisions
AR6.8	WAC 173-400-040(7)	<b>Sulfur Dioxide.</b> WAC 173-400-040(7) prohibits emission of a gas containing sulfur dioxide from any emission unit in excess of 1000 ppm of sulfur dioxide on a dry basis, corrected to 7% oxygen for combustion sources, and based on the average of any period of 60 consecutive minutes in accordance with the reference test method.	EPA Method 6, 6A, 6B, or 6C	M15

***EU7 and EU11 Decorator Units – Line 1 and Line 2 (AR7) Applicable Requirements***

REQ #	Applicable Requirement Citations	Applicable Requirement Description (for information purposes only)	Reference Method (if applicable)	Required Monitoring Provisions
AR7.1	Subpart WW Emission Standards 40 CFR 60.492; 98NOC021 Condition 2	<b>Applicable Subpart WW Emission Standards:</b> The permittee shall not discharge nor cause the discharge of VOC emissions to the atmosphere that exceed the following volume weighted calendar-month average emissions: a) 0.46 kilogram of VOC per liter of coating solids from each over-varnish coating operation.	Reference Method 24 or material formulation data supplied by the manufacturer, and the calculation procedures as specified in §60.493(b)(1).	M14

REQ #	Applicable Requirement Citations	Applicable Requirement Description (for information purposes only)	Reference Method (if applicable)	Required Monitoring Provisions
AR7.2	Subpart A Operations and Maintenance Requirements 40 CFR 60.11 (d)	<b>Operations and Maintenance Requirement:</b> At all times, including periods of startup, shutdown, and malfunction, the Permittee shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the EPA Administrator and ORCAA which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.	None	None

***EU8 and EU12 Printer (PIN) Ovens – Line 1 and Line 2 (AR8) Applicable Requirements***

REQ #	Applicable Requirement Citations	Applicable Requirement Description (for information purposes only)	Reference Method (if applicable)	Required Monitoring Provisions
AR8.1	Subpart A Operations and Maintenance Requirements 40 CFR 60.11 (d)	<b>Operations and Maintenance Requirement:</b> At all times, including periods of startup, shutdown, and malfunction, the Permittee shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the EPA Administrator and ORCAA which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.	None	M8

REQ #	Applicable Requirement Citations	Applicable Requirement Description (for information purposes only)	Reference Method (if applicable)	Required Monitoring Provisions
AR8.2	ORCAA 8.8 (local only)	<b>Maintenance and Repair of Air Pollution Control Equipment and Processes.</b> All air contaminant sources are required to keep any process and/or air pollution control equipment in good operating condition and repair.	None	M8

***EU9 and EU13 Lacquer Spray Machines – Line 1 and Line 2 (AR9) Applicable Requirements***

REQ #	Applicable Requirement Citations	Applicable Requirement Description (for information purposes only)	Reference Method (if applicable)	Required Monitoring Provisions
AR9.1	Subpart WW Emission Standards 40 CFR 60.492; 98NOC021 Condition 2	<b>Applicable Subpart WW Emission Standards:</b> The permittee shall not discharge nor cause the discharge of VOC emissions to the atmosphere that exceed the following volume weighted calendar-month average emissions: a) 0.89 kilograms of VOC per liter of coating solids from each two-piece can inside spray coating operation.	Reference Method 24 or material formulation data supplied by the manufacturer, and the calculation procedures as specified in §60.493(b)(1).	M14
AR9.2	Subpart A Operations and Maintenance Requirements 40 CFR 60.11 (d)	<b>Operations and Maintenance Requirement:</b> At all times, including periods of startup, shutdown, and malfunction, the Permittee shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the EPA Administrator and ORCAA which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.	None	M1 M8

REQ #	Applicable Requirement Citations	Applicable Requirement Description (for information purposes only)	Reference Method (if applicable)	Required Monitoring Provisions
AR9.3	ORCAA 8.8 (local only)	<b>Maintenance and Repair of Air Pollution Control Equipment and Processes.</b> All air contaminant sources are required to keep any process and/or air pollution control equipment in good operating condition and repair.	None	M8

***EU10 and EU14 Internal Bake Ovens (IBO) – Line 1 and Line 2 (AR10) Applicable Requirements***

REQ #	Applicable Requirement Citations	Applicable Requirement Description (for information purposes only)	Reference Method (if applicable)	Required Monitoring Provisions
AR10.1	Subpart A Operations and Maintenance Requirements 40 CFR 60.11 (d)	<b>Operations and Maintenance Requirement:</b> At all times, including periods of startup, shutdown, and malfunction, the Permittee shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the EPA Administrator and ORCAA which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.	None	M8
AR10.2	ORCAA 8.8 (local only)	<b>Maintenance and Repair of Air Pollution Control Equipment and Processes.</b> All air contaminant sources are required to keep any process and/or air pollution control equipment in good operating condition and repair.	None	M8

[END OF SECTION]

## VII. MONITORING TERMS AND CONDITIONS (M)

### ***Plant-wide Monitoring***

The following monitoring requirements apply plant wide.

**M1. Opacity Surveys.** The permittee shall conduct visual opacity surveys of the facility during daylight hours as follows:

- a) The surveys shall consist of visual observation of all emission units to identify point and fugitive emissions that exhibit opacity greater than zero percent (0%).
- b) Opacity surveys shall be conducted daily.
- c) The permittee may conduct opacity surveys weekly if:
  - i) survey results from the previous 5 consecutive days show compliance with applicable opacity limits and requirements to minimize fugitive emissions; and
  - ii) Subsequent weekly surveys continue to show compliance with applicable opacity limits and requirements to minimize fugitive emissions. Any noncompliance shall return the frequency to daily until the criteria in (i) can be met.
- d) Surveys shall be conducted from locations with a clear view of the target emission unit and where the sun is at the observer's back. Survey locations shall be at least 15 feet but not more than .25 miles from the facility.
- e) Observer certification for plume evaluation is not required to conduct the survey. However, it is necessary that the observer is educated on the general procedures for determining the presence of visible emissions. As a minimum, the observer must be trained and knowledgeable regarding the effects on the visibility of emissions caused by background contrast, position of the sun and amount of ambient lighting, observer position relative to source and sun, and the presence of uncombined water.
- f) Each stack shall be observed when the connected emissions unit is operating, and for a minimum of 15 seconds during the survey.
- g) The emergency fire pump engine stack shall be surveyed whenever it is operated for readiness testing.
- h) Any visible emissions other than uncombined water shall be recorded as a positive reading associated with the emission point or stack.
- i) If it is not possible to conduct the survey due to inclement weather conditions, the permittee shall make three attempts during the day to conduct the survey. All attempts to conduct the survey shall be recorded in accordance with Condition RK3.
- j) In addition to the records required under Condition RK3, the observer shall record the wind direction, sky condition, sun location with respect to the facility and the survey location, and the time duration of the survey.

*[WAC 173-401-615(1)(b)]*

**M2. Opacity Compliance Demonstration Required.** When point or fugitive emissions are observed during surveys, other than visible emissions due to uncombined water, the Permittee shall:

- a) Complete Reference Method opacity readings for any emissions point exhibiting opacity in accordance with condition M3; or,
- b) For fugitive emissions causing opacity, determine and document that reasonable and/or appropriate precautions are being taken to prevent the fugitive emissions. The determination shall be completed within 24 hours of the opacity survey.

*[WAC 173-401-615(1)(b)]*

**M3. Opacity Reading Procedures.** When required, pursuant to condition M2, the permittee shall conduct opacity readings consistent with the appropriate reference test methods as follows:

- a) Certified opacity readings shall be completed within 1 hour of the opacity survey that initially triggered them unless the subject emission unit is not operating, or lack of daylight or weather conditions prevent conducting the testing;
- b) Certified opacity readings shall be performed by employees of the source, a certified contractor or by ORCAA, and shall be performed by persons with current EPA Method 9 certification in plume evaluation;
- c) All certified opacity readings shall be performed during periods when the subject emissions unit is operating;
- d) If the subject emissions unit is down for maintenance or not operating, the permittee shall commence compliance verification within one hour after the unit comes back on line;
- e) If it is not possible to perform certified opacity readings due to inclement weather conditions or lack of daylight, the permittee shall document the conditions and shall make repeated daily attempts to conduct the testing until it is accomplished; and
- f) Compliance verification shall consist of certified opacity readings at 15-second intervals over a minimum period of six consecutive minutes (24 consecutive readings) unless any one reading is greater than 20% opacity in which case the observation period shall be 60 minutes or until a violation is documented.

*[WAC 173-401-615(1)(b)]*

**M4. Complaint Monitoring.** The permittee shall monitor all air quality related complaints directed to the facility as follows:

- a) The permittee shall provide an automatic phone recording system or an onsite contact person available to the general public for filing a complaint whenever the facility is operating.
- b) The phone number for the facility shall be a listed phone number and made available to local authorities including the county health department, ORCAA, Ecology, and the local fire protection agency/department.

*[WAC 173-401-615(1)(b)]*

**M5. Fugitive Emissions and Dust Control Monitoring.** The permittee shall conduct a monthly audit of operations with the potential for fugitive emissions or dust. At a minimum, the



audit shall evaluate the areas and operations identified in the fugitive emissions control plan required by Condition PW4.

*[WAC 173-401-615(1)(b)]*

**M6. GHG Monitoring Requirements.** The permittee shall monitor facility operations, fuel rates and composition of fuels as necessary to report GHG emissions to Ecology in accordance with Chapter 173-441 WAC. The following monitoring provisions apply:

- a) Permittee shall develop a written GHG monitoring plan in accordance with WAC 173-441-050(6)(e). The permittee shall revise the GHG monitoring plan as needed to reflect changes in processes, monitoring instrumentation, and quality assurance procedures; or to improve procedures for the maintenance and repair of monitoring systems to reduce the frequency of monitoring equipment downtime.
- b) Flow meters and other measurement devices used to measure fuel feed rates, process steam flow rates, or feedstock flow rates to provide data to perform the GHG emissions calculations shall be calibrated according to the procedures specified in WAC 173-441-050(8).

*[State Only: Chapter 173-441 WAC]*

**M7. General Source Testing Procedures and Methods.** To demonstrate compliance, Ecology or ORCAA may conduct or require that a test be conducted of the source in accordance with the following conditions:

- a) **General Test Methods.** Use approved EPA methods from 40 CFR parts 51, 60, 61 and 63 (in effect on July 1, 2015), or approved procedures contained in “*Source Test Manual – Procedures for Compliance Testing*,” state of Washington, Department of Ecology, as of September 20, 2004, on file at Ecology. The operator of the source shall be required to provide the necessary platform and sampling ports for ORCAA personnel or others to perform a test of an emissions unit. ORCAA shall be allowed to obtain a sample from any emissions unit. The operator of the source shall be given an opportunity to observe the sampling and to obtain a sample at the same time.

*[WAC 173-400-105(4)]*

- b) **Appropriate Testing Facilities.** When requested by ORCAA, the permittee is required to provide an appropriate source testing platform and sampling ports.

*[Local Only: ORCAA 1.5(j)]*

**M8. Pollution Control Equipment Monitoring.** The permittee shall monitor air pollution control equipment and systems for the specified emission units according to Table M8.1 and any corrective actions taken to maintain operations within target operating ranges. The permittee is temporarily exempted from a monitoring requirement of this condition during periods when the associated EU is not operating provided the permittee keeps a contemporaneous record of when the EU is not operating.

**TABLE M8.1 Prescribed Operating Ranges for Pollution Control Equipment**

EU	Monitoring Requirement	Prescribed Operating Ranges and Parameters	Frequency
EU9 EU13	Inspect condition of spray box filters.	Spray box filter condition: 1. Filters are operable meaning they are not over-loaded with accumulated material to the point of being “blinded”. 2. Filters properly aligned and seated. 3. No substantial, visible rips, tears or holes.	Weekly
EU8 EU10	Inspect interior of exhaust stack	Interior of stack is free of significant amounts of deposited material.	Quarterly
EU12 EU14	Evaluate oven burner efficiency through inspection by a qualified technician.	Assure burner efficiency through preventive maintenance and service.	At least every 13 months
EU2 EU3	Evaluate dryer burner efficiency through inspection by a qualified technician.	Assure burner efficiency through preventive maintenance and service.	At least every 13 months

[WAC 173-401-615(1)(b)]

**M9. Emissions Monitoring.** For purposes of monitoring compliance with the annual VOC emission limitation specified in Condition PW12 and the annual HAP limitation specified in Condition PW13 of this permit, VOCs and HAP emissions shall be determined as follows:

- a) **Process Emissions.** Process emissions resulting in VOCs and HAPs emissions shall be calculated using mass balance methods based on ORCAA approved emission factors, actual materials used over the period, and the actual percent composition of each unique material. The permittee may credit shipments of waste in the mass balance calculation only when a characterization test has been performed on each container of waste, or on a container representing a group of containers filled from one batch of waste.
- b) **Cure HAPs.** Cure HAPs are those pollutants (e.g. formaldehyde) which are formed in the Pin Ovens and the Interior Bake Ovens (IBOs) during the can coating curing process. Cure HAPs shall be calculated using emission factors based on actual stack tests or other factors as approved by ORCAA. All emission factors used shall be approved by ORCAA.
- c) **Combustion Emissions.** VOC and HAP emissions due to combustion shall be estimated based on the amount of fuel combusted during the period and emission factors from the most current version of the EPA document, Compilation of Air Pollutant Emission Factors, AP-42, or other factors as approved by ORCAA.

- d) Material Use and Composition.** Monthly use of acids, inks, lacquers, cleaning solvents (isopropanol and naphtha) and other materials containing VOCs and HAPs shall be monitored as follows:
- i)** Materials usage shall be monitored at least monthly in terms of total pounds used, total gallons used, or both.
  - ii)** VOC and HAP content shall be monitored in terms of pounds of material or percent by weight.
  - iii)** The VOC and HAP composition of each unique material shall be determined based on safety data sheets (SDS) and/or Certificates of Analyses specific to each material.

*[WAC 173-401-615(1)(b); 00MOD063 Condition 2; 05NOC420 Condition 2; 05NOC420 Condition 5]*

**M10. Monitoring Compliance with Annual VOC Emission Limit.** The Permittee shall monitor compliance with the facility-wide VOC emission limit of Condition PW12 on at least a monthly basis by computing the actual VOC emissions from the facility over the previous month and previous 12 consecutive months. Actual emissions of VOCs shall be calculated as specified in Condition M9.

*[WAC 173-401-615(1)(b); ORCAA 8.11; WAC 173-400-105; 00MOD063 Condition 2]*

**M11. Monitoring Compliance with Annual HAP Emission Limit.** The Permittee shall monitor compliance with the facility-wide HAP emission limit of Condition PW13 on at least a monthly basis by computing the actual HAP emissions from the facility over the previous month and previous 12 months. Actual emissions of HAPs shall be calculated as specified in Condition M9.

*[WAC 173-401-615(1)(b); 05NOC420 Condition 3]*

**M12. Cure HAP Testing.** The permittee shall conduct source tests for Cure HAPs to determine compliance with facility-wide HAP limits in Condition PW13. Cure HAPs are those pollutants (e.g. formaldehyde) which are formed in the Pin Ovens and the Interior Bake Ovens (IBOs) during the can coating curing process. Testing shall be conducted as follows:

- a)** Prior to conducting the source test in (b), the permittee shall conduct preliminary sampling (e.g. grab samples) to identify any HAPs in the exhaust stream in addition to formaldehyde.
- b)** The permittee shall conduct a source test for Cure HAPs for each Printer Oven (EU8 and EU12) and each Interior Bake Oven (EU10 and EU14) no later than June 30, 2017.
- c)** Following the test required in (b), the permittee shall conduct a source test for Cure HAPs for each Printer Oven (EU8 and EU12) and each Interior Bake Oven (EU10 and EU14) at least once every 61 months.
- d)** All source testing shall be conducted in accordance with Condition M7, Condition R9, and Condition R10.

*[WAC 173-401-615(2)]*

### ***EU1 and EU3 Can Washing Solution Monitoring***

The following monitoring requirement applies only to the Can Washers (EU1 and EU3).

**M13. Monitoring Compliance with Can Washing Solution Limits.** The permittee shall monitor compliance with Condition PW14 on at least monthly basis by monitoring the actual amount of low concentration sulfuric acid (less than 60% sulfuric acid by weight), hydrofluoric acid, and high concentration sulfuric acid (greater than 60% sulfuric acid by weight) consumed in the can washer. The permittee shall compute the actual amount of can washing solution used over the previous month and previous 12-consecutive month period based on company records and a monthly inventory of the washing solutions. Prior to purchase or acceptance of any washing solutions, the permittee shall verify, based on safety data sheets or certificates of analysis, that the washing solutions purchased or accepted meet the concentration standards specified in Condition PW14.

*[WAC 173-401-615(1)(a); 95NOC641 Condition 2; 00NOC027 Condition 1; 08NOC622 Condition 3]*

#### ***EU4, EU7, EU9, EU11, EU13 Subpart WW Monitoring***

The following monitoring requirement applies only to the Rim Coater (EU4), Decorators (EU7 and EU11), and Lacquer Spray Machines (EU9 and EU13).

**M14. Subpart WW Monthly Performance Testing Requirements and Methods.** On a monthly basis, the Permittee shall conduct a performance test for each affected facility for monitoring compliance with the limits in Conditions AR4.1, AR7.1, and AR9.1. The owner or operator shall use the following procedures to conduct the performance test.

- a) The owner or operator shall determine the VOC-content of the coatings from formulation data supplied by the manufacturer of the coating or by an analysis of each coating, as received, using Method 24 as described in 40 CFR 60.496(a)(1) and (b). The owner or operator shall determine from company records the volume of coating and the mass of VOC-solvent added to coatings. ORCAA may require the owner or operator who uses formulation data supplied by the manufacturer of the coating to determine the VOC content of coatings using Method 24 or an equivalent or alternative method.
- b) For each affected facility, the owner or operator shall:
  - i) Calculate the volume-weighted average mass of VOC per volume of solids discharged per the methods described in 40 CFR 60.493(b)(1)(i)-(iii); or
  - ii) If each individual coating used by an affected facility has a VOC content equal to or less than the limit specified in Conditions AR4.1, AR7.1, and AR9.1, the affected facility is in compliance provided no VOC-solvents are added to the coating during distribution or application.

*[WAC 173-401-615(1)(a); §60.493(b)(1); 40 CFR 60.496(a)(1); 40 CFR 60.496(b)]*

#### ***EU6 Emergency Fire Pump Engine Monitoring***

The following monitoring requirement applies only to the Emergency Fire Pump Engine (EU6).

**M15. Sulfur Dioxide Emissions Monitoring.** The permittee shall determine the sulfur contents of diesel fuel used, as received, using ASTM D4294-98, or EPA Method 6010, except that no

determination is required for diesel fuel containing less than 2% sulfur by weight. The permittee may rely upon information from fuel suppliers as to sulfur content. For diesel fuel combusted by the engine, the permittee shall confirm prior to purchase that the sulfur content of the liquid fuel used is less than 2%. The use of any fuel with a sulfur content of greater than 2% requires a reference method source test during the use of that fuel.  
*[WAC 173-401-615(1)(b)]*

*[END OF SECTION]*

## VIII. RECORDKEEPING (RK)

The following recordkeeping requirements apply plant-wide.

**RK1. Retention and Availability of Records:** The permittee shall maintain all records required by this permit. All required records shall be retained for at least 5 years from the origination date and shall be available for inspection by ORCAA upon request.

*[WAC 173-401-615(2)(c); §63.6660]*

**RK2. Record of Changes.** The permittee shall maintain records describing changes made that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

*[WAC 173-401-615 (2)(b); WAC 173-401-724(5)]*

**RK3. Monitoring Records.** The permittee shall keep records of required monitoring and testing including, where applicable, the following:

- a) The date, location, and time of sampling or measurement;
- b) The date(s) analyses were performed;
- c) The company or entity that performed the analyses;
- d) The analytical techniques or methods used;
- e) The results of analyses; and
- f) The operating conditions existing at the time of sampling or measurement.

*[WAC 173-401-615(2)(a)]*

**RK4. Record of Permit Deviations.** The permittee shall maintain a contemporaneous record of all permit deviations.

*[WAC 173-401-615(3)(b)]*

**RK5. Availability of Emissions Records.** Emission records required by this permit shall be made available to ORCAA upon request.

*[Local Only: ORCAA 8.11(b)]*

**RK6. Emissions Records.** The permittee shall maintain records of information necessary to substantiate any reported emissions, consistent with the averaging times for the applicable standards.

*[WAC 173-400-105(1); ORCAA 8.11(a)]*

**RK7. Unlawful Reproduction or Alteration of Documents.** No person shall reproduce or alter, or cause to be reproduced or altered, any order, registration certificate or other paper issued by ORCAA if the purpose of such reproduction or alteration is to evade or violate any applicable requirement.

*[Local Only: ORCAA 7.3]*

**RK8. Display of Orders, Certificates and Other Notices.** Any order required by ORCAA Regulations shall be available on the premises designated on the order. In the event that ORCAA requires a notice to be displayed, it shall be posted.

*[Local Only: ORCAA 7.4]*

**RK9. Record of Complaints.** The permittee shall keep a record of air quality related complaints received, the assessment of the validity of each complaint, and what, if any, corrective action was taken in response to the complaint. Records shall include, if available or provided, the following information:

- a) Description of the complaint.
- b) Date and time the alleged impact was first noticed.
- c) Date and time the alleged impact was last noticed.
- d) Location where the alleged impact was experienced.
- e) Name and phone number of caller.
- f) The permittee's assessment of the complaint.
- g) Description of any corrective action taken.

*[WAC 173-401-615(2)(a)]*

**RK10. Record of Actions Taken to Maintain Air Pollution Control Equipment.** The permittee shall keep a record of major maintenance actions taken to maintain air pollution control equipment in good operating condition and repair. Records shall include:

- a) Date and time the action commenced;
- b) Description of the action;
- c) Description of outcome or findings;
- d) Date and time the action was completed;
- e) Name of person or company performing the maintenance; and,
- f) Duration of time the subject equipment was not operational.

*[WAC 173-401-615(2)(a)]*

**RK11. MACT Applicability Records.** For each relevant standard or other applicable requirement under 40 CFR Part 63, which the permittee determines inapplicable, the permittee shall keep record of the applicability determination on site for five years after the determination, or until the source changes its operations to become an affected source, whichever comes first. For the purposes of this condition, a relevant standard is defined as any standard for which:

- a) The source emits or has the potential to emit (without considering controls) one or more hazardous air pollutants regulated by the standard; and,
- b) The source belongs to the source category regulated by the standard.

The record of the applicability determination must be signed by the person making the determination and include an analysis (or other information) that demonstrates why the owner or operator believes the source is unaffected (e.g., because the source is an area source). The analysis (or other information) shall be sufficiently detailed to allow ORCAA to make a finding about the source's applicability status with regard to the relevant standard or other

requirement. If required, the analysis shall be performed in accordance with requirements established in the relevant subpart for this purpose, and the analysis should be performed in accordance with EPA guidance materials published to assist sources in making applicability determinations under section 112, if any.

*[40 CFR 63.1(b)(3); 40 CFR 63.10(b)(3)]*

**RK12. Records Required for Greenhouse Gas (GHG) Reporting.** If the permittee is required to prepare annual GHG reports to Ecology pursuant to Chapter 173-441 WAC, the permittee shall maintain records in accordance with WAC 173-441-050, retaining, at a minimum, the following:

- a) A list of all units, operations, processes, and activities for which GHG emissions were calculated.
- b) The data used to calculate the GHG emissions for each unit, operation, process, and activity, categorized by fuel or material type. These data include, but are not limited to, the following information:
  - i) The GHG emissions calculations and methods used, as required by WAC 173-441-120.
  - ii) Analytical results for the development of site-specific emissions factors.
  - iii) The results of all required analyses for high heat value, carbon content, and other required fuel or feedstock parameters.
  - iv) Any facility operating data/process information used for the GHG emission calculations.
- c) Copies of the annual GHG reports.
- d) Missing data computations. For each missing data event, also retain a record of the cause of the event and the corrective actions taken to restore malfunctioning monitoring equipment.
- e) The GHG Emissions Monitoring Plan required by condition M6.
- f) The results of all required certification and quality assurance tests of continuous monitoring systems, fuel flow meters, and other instrumentation used to provide data for the GHGs reported under this chapter.
- g) Maintenance records for all continuous monitoring systems, flow meters, and other instrumentation used to provide data for the GHGs reported under this chapter.

*[State only: WAC 173-441-050(6)]*

**RK13. Operation and Maintenance Plan Records.** The permittee shall maintain written copies of all Operation and Maintenance plans required under this permit. The plans must be maintained on site and be made available for inspection.

*[WAC 173-401-615(2); ORCAA 8.11; §63.6655(d)]*

**RK14. Material Composition Records.** The permittee shall maintain copies of up-to-date and representative Certificates of Analysis or Safety Data Sheets (SDS) for all VOC and HAP containing materials used.

*[WAC 173-401-615(2)(a); 05NOC420 Condition 2]*



**RK15. Material Use Records.** In addition to standard requirements for monitoring records, the permittee shall maintain the following records with respect to material usage:

- a) **SDS.** Certificates of Analysis or Safety Data Sheets (SDS) for all materials used at the facility containing VOC and/or HAPs (excluding janitorial and office supplies).
- b) **Emissions Logs.** On a monthly basis the following facility-wide emission totals shall be recorded:
  - i) Monthly total of VOC emissions from the previous month;
  - ii) Cumulative total of VOC emissions from the facility over the previous 12 consecutive month period;
  - iii) Monthly total of emissions of each individual HAP emitted from the facility;
  - iv) Cumulative total emissions of each individual HAP emitted from the facility over the previous 12 consecutive month period;
  - v) Monthly total of all HAP emissions combined from the previous month; and,
  - vi) Cumulative total of all HAP emissions combined from the facility over the previous 12 consecutive month period.
- c) **Material Use Logs.** On a monthly basis the following material use totals shall be recorded:
  - i) Actual amount of low concentration sulfuric acid (less than 60% sulfuric acid by weight), hydrofluoric acid, and high concentration sulfuric acid (greater than 60% sulfuric acid by weight) consumed in the can washer for the previous month;
  - ii) Actual amount of low concentration sulfuric acid (less than 60% sulfuric acid by weight), hydrofluoric acid, and high concentration sulfuric acid (greater than 60% sulfuric acid by weight) over the previous 12 consecutive month period.
- d) **Purchase Invoices.** Records for all materials purchased (including can washing solutions) during the previous 12-month period, which contain VOC and/or HAPs (excluding janitorial supplies). Purchase invoices shall reference a specific SDS or Certificate of Analysis, which characterizes the material purchased.
- e) **Subpart WW Performance Testing.** The results of all monthly performance testing required by Condition M14. Where only coatings which individually have a VOC content equal to or less than the limits specified under Conditions AR4.1, AR7.1, and AR9.1 are used, and no VOC is added to the coating during the application or distribution process, the record shall include a list of the coatings used for each affected facility and the VOC content of each coating calculated from data determined using Method 24 or supplied by the manufacturers of the coatings.

*[WAC 173-401-615(1)(b) & (2); 95NOC641 Condition 3; 00MOD063 Condition 2; 05NOC420, Condition 2 and 3; 08NOC622 Condition 4; §60.7(f)]*

**RK16. Records Required by 40 CFR Part 63, Subpart ZZZZ.** The following records shall be maintained in a form suitable and readily available for expeditious review for at least five years. For at least two years they shall be maintained on site:

- a) Records to document conformance with management practice standards including the dates of each oil and filter change, air filter inspection, and hose and belt inspection and replacement;

- b) Records of the occurrence and duration of each malfunction of the engine;
- c) Records of actions taken during periods of malfunction to minimize emissions;
- d) Records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The owner or operator must document how many hours are spent for emergency operation; including what classified the operation as emergency and how many hours are spent for non-emergency operation. If the engines are used for demand response operation, the owner or operator must keep records of the notification of the emergency situation, and the time the engine was operated as part of demand response;
- e) Records of the amount of the engine's time spent at idle during startup; and
- f) If utilizing the optional oil analysis program in Condition AR6.2, records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine.

*[WAC 173-401-615(b)(1); §63.4(a)(2); §63.10(b)(1); §63.6595; §63.6625(i); §63.6655(a)(2),(4)&(5); §63.6655(e)&(f); §63.6660]*

*[END OF SECTION]*

## IX. REPORTING (R)

The following reporting requirements apply plant-wide.

**R1. Certification of Reports.** All reports shall contain certification by a responsible official per Condition P19. For reports submitted more frequently than once every six months, the certification need only be submitted once every six months, covering all required reporting since the date of the last certification.

*[WAC 173-401-630(1)]*

**R2. Annual Compliance Certification.** The permittee shall annually submit to ORCAA and to the U.S. Environmental Protection Agency Administrator, in care of Region 10 of the U.S. Environmental Protection Agency (EPA), an Annual Compliance Certification which shall certify the status of compliance with respect to all permit conditions during the previous 12-month period. Annual Compliance Certifications shall certify the status of compliance continuously over the certification period, and the certification period shall not exceed 12 months from the end of the certification period covered in the previous certification. Annual Compliance Certifications shall be submitted to ORCAA and EPA Region 10 no later than September 30<sup>th</sup> each year and shall cover the continuous 12-month period ending the previous August 31<sup>st</sup>. The certifications shall be certified by a responsible official in accordance with Condition P19.

Annual Compliance Certifications shall include:

- a) Identification of each term or condition of the permit that is the basis of the certification.
- b) Certification of the status of compliance with each term or condition of the permit for the period covered by the certification and whether compliance was continuous or intermittent.
- c) Identification of the method(s) or other means used by the permittee for determining the compliance status, and whether such methods or other means provide continuous or intermittent data.
- d) If necessary, any other material information to comply with section 113(c)(2) of the FCAA, which prohibits knowingly making a false certification or omitting material information.

*[WAC 173-401-630(5)]*

**R3. Confidential Information.** Records or other information submitted to ORCAA, that are considered by the permittee to be proprietary and confidential, shall be only for the confidential use of ORCAA provided that:

- a) The information relates to processes or production unique to the permittee or are likely to affect adversely the competitive position of the permittee if released to the public or to a competitor; and,
- b) The permittee certifies the proprietary and/or confidential nature of the records or information at the time of submittal.

*[Local Only: ORCAA 1.6]*

**R4. Semi-annual Monitoring Reports (SAMRs).** The permittee shall submit to ORCAA a report summarizing the results of monitoring conducted for each six-month reporting period no later than March 30<sup>th</sup> and September 30<sup>th</sup> each year. Semi-annual monitoring reports submitted by March 30<sup>th</sup> shall cover, at a minimum, operations over the previous September through February. Semi-annual monitoring report submitted by September 30<sup>th</sup> shall cover, at a minimum, operations over the previous March through August. SAMRs shall include a summary of all monitoring conducted in accordance with Section VII of this permit, and shall include the following as applicable:

- a) A summary of results of required monitoring conducted over the reporting period; and
- b) Identification and characterization of all instances of deviations from permit requirements.

*[WAC 173-401-615(3)(a)]*

**R5. Reporting Deviations from Permit Conditions.** The permittee shall promptly report any deviations from permit conditions, including those attributable to upset conditions as defined in this permit. The following conditions shall apply:

- a) **Prompt Reporting.** For purposes of this permit, submitting a report “promptly” means the following:
  - i) **Potential Threat to Human Health or Safety:** If the deviation presents a potential threat to human health or safety, “promptly” means as soon as possible but no later than 12 hours after discovery of the deviation. This notification may be made by facsimile or e-mail; however, the permittee shall also submit a written notice within 10 days of the occurrence;
  - ii) **Other Deviations:** For other deviations, “promptly” means as soon as possible but no later than 30 days after the end of the month during which the deviation was discovered.
- b) **Deviation Report Content.** Permit deviation reports shall describe the probable cause of such deviations, corrective actions taken or planned, and preventive measures taken.
- c) **Reporting Unavoidable Excess Emissions.** The deviation report may include demonstration that excess emissions were unavoidable due to start-up, shutdown or upset conditions consistent with the requirements of Condition P18.
- d) **Reporting Deviations due to Emergencies.** The deviation report may include demonstration that excess emissions were due to an emergency, consistent with the requirements of Condition P16.

*[WAC 173-401-615(3)(b); WAC 173-400-107(3); WAC 173-401-645]*

**R6. Notification of Control Equipment Malfunction.** The permittee shall notify ORCAA of malfunctions of pollution control equipment identified in Table M8.1 when repairs cannot be completed within 24 hours. For purposes of this notification, the term “malfunction” shall mean that the control equipment is inoperable, or cannot maintain operation within the prescribed operating conditions specified in Table M8.1. The notification shall be made within two working days from the time the malfunction was discovered and shall include a description of the

malfunction and any corrective actions taken or planned. The notification shall be made by facsimile, e-mail, or in writing. However, if the notification is made by facsimile or e-mail, the permittee shall also submit a written notice within 10 days of the occurrence.

*[WAC 173-401-615(3)]*

**R7. Notification of Complaint Received.** The permittee shall notify ORCAA of any complaint received within 24 hours of the time when the complaint or allegation was received. The notification shall include a short description of the complaint, time it was received, actions taken, actions planned and preliminary assessment. The notification shall be made by facsimile, e-mail, or in writing. However, if the notification is made by facsimile or e-mail, the permittee shall also submit a written notice within 10 days of the occurrence.

*[WAC 173-401-615(2)]*

**R8. Annual Inventory Report.** No later than March 1st of each year, the permittee shall submit an inventory of the actual amount of pollutants emitted during the previous calendar year. The inventory shall be submitted to ORCAA on standard inventory reporting forms and shall be accompanied by associated calculations, data or other information used in calculating the reported emissions. A request for extension may be considered if a request from the Responsible Official is received by ORCAA prior to February 25th. The request must include a statement of the unexpected circumstances that occurred, how this affects your ability to submit the report on time, and the number of additional days needed.

*[WAC 173-400-105(1); ORCAA 8.11]*

**R9. Testing Notification and Test Rescheduling.**

- a) The permittee shall notify ORCAA in writing at least 30 days prior to any compliance test by submitting a test plan for ORCAA's review. The test plan shall describe the proposed source test methods, operational conditions proposed for the test, and provisions for monitoring source operation during the test.
- b) **Rescheduling:** If, after providing written notice of a performance test, there is a delay (due to operational problems, etc.) in conducting the scheduled performance test, the owner or operator of an affected facility shall notify ORCAA as soon as possible of the delay by providing at least seven days prior notice of the rescheduled date of the performance test, or by arranging a rescheduled test date with ORCAA by mutual agreement.
- c) This condition does not apply to the Subpart WW Performance Testing required by Condition M14.

*[WAC 173-401-630(1); WAC 173-400-105(4); 02NOC234 Condition 11; §60.493(a)]*

**R10. Source Test Reports.** Whenever source testing is required, the permittee shall submit test results to ORCAA within 45 days of test completion. The report shall include:

- a) A description of the source and sampling location;
- b) The time and date of the test;

- c) A summary of results, reported in units and for averaging periods consistent with the applicable emission standard;
- d) A description of the test methods and quality assurance procedures used;
- e) The amount of fuel burned and/or raw material processed by the source during the test;
- f) The operating parameters of the source and control equipment during the test; and,
- g) Field data and example calculations.

[WAC 173-401-630(1)]

**R11. State Greenhouse Gas (GHG) Reporting.** The permittee shall be subject to the requirement to report greenhouse gas (GHG) emissions to Ecology in accordance with Chapter 173-441 WAC if annual, facility wide emissions of carbon dioxide equivalents (CO<sub>2</sub>e) are 10,000 metric tons per year or more from all source categories listed in WAC 173-441-120. The following requirements shall apply:

- a) Once the facility emits 10,000 metric tons of GHGs or more per calendar year, the permittee shall report emissions of GHGs to Ecology annually thereafter unless the permittee is allowed to discontinue reporting as allowed by WAC 173-441-030(5) and the specified notice is submitted to Ecology.
- b) To calculate GHG emissions, the permittee shall include all GHGs listed in Table A-1 of WAC 173-441-040, including those emitted from the combustion of biomass, using equation A-1 from WAC 173-441-030(1)(b)(iii).
- c) Reports must meet the requirements of WAC 173-441-050, and include the annual emissions of the GHGs listed in WAC 173-441-040 from source categories listed in WAC 173-441-120.
- d) The annual GHG report shall be submitted electronically in accordance with the requirements of WAC 173-441-050 and 173-441-060 and in a format specified by Ecology.
- e) GHG emissions reports are due to Ecology:
  - i) No later than March 31 of each calendar year for GHG emissions in the previous calendar year for facilities required to report GHG emissions to the EPA under 40 C.F.R. Part 98;
  - ii) No later than October 31st of each calendar year for GHG emissions in the previous calendar year for facilities not required to report GHG emissions to the EPA under 40 C.F.R. Part 98.
- f) All requests, notifications, and communications to Ecology pursuant to GHG emissions reporting, other than submittal of the annual GHG report, shall be submitted to the following address:
  - Greenhouse Gas Report
  - Air Quality Program
  - Department of Ecology
  - P.O. Box 47600
  - Olympia, WA 98504-7600
- g) The permittee shall submit a revised annual GHG report within 45 days of discovering that an annual GHG report previously submitted contains one or more substantive

errors. A substantive error is an error that impacts the quantity of GHG emissions reported or otherwise prevents the reported data from being validated or verified. The revised report must correct all substantive errors.

- h) Ecology may notify the permittee in writing that an annual GHG report previously submitted contains one or more substantive errors. Such notification will identify each such error. The permittee shall, within 45 days of receipt of the notification, either resubmit the report that, for each identified substantive error, corrects the identified substantive error (in accordance with the applicable requirements of this permit) or provide information demonstrating that the previously submitted report does not contain the identified substantive error or that the identified error is not a substantive error.

*[State Only: Chapter 173-441 WAC]*

**R12. Quarterly Monitoring Report.** The permittee shall identify, record, and submit quarterly reports to ORCAA of each instance in which the volume weighted average of the total mass of VOC per volume of coating solids, after the control device, if capture devices and control systems are used, is greater than the limit specified under §60.492. The reports shall be submitted no later than 30 days after the end of each calendar quarter. If no such instances occur during a particular quarter, a report stating this shall be submitted to ORCAA with the semi-annual monitoring report required by Condition R4.

*[WAC 173-401-630(1); §60.495(b)]*

**R13. HAP Emissions Notification.** The permittee shall notify ORCAA, in writing, within 30 days after the end of each 12-month period if, during that period, emissions of any single HAP exceeded 8.5 tons, or emissions of all HAPs exceeded 22 tons. The report shall include emissions data for the time period for which these thresholds were exceeded.

*[WAC 173-401-630(1); 05NOC420 Condition 4]*

**R14. Subpart ZZZZ Management Practice Reporting.** If the management practices in Condition AR6.1 were delayed due to unacceptable risk under Federal, State, or local law, the permittee shall report the failure to perform the management practices on the required schedule and the Federal, State, or local law under which the risk was deemed unacceptable.

*[§ 63.6595; §63.6603 Table 2d]*

*[END OF SECTION]*

## **X. PERMIT SHIELD CONDITIONS (S)**

**S1. Permit Shield.** Compliance with a permit condition shall be deemed compliance with the applicable requirements upon which that condition is based, as of the date of permit issuance. The permit shield does not apply to any insignificant emissions units or activity designated under WAC 173-401-530.

*[WAC 173-401-640(1)]*

**S2. Inapplicable or Exempt Requirements.** The requirements shown in Table X.1, as of the date of permit issuance, have been determined not to apply to the corresponding emissions units indicated due to either inapplicability of the requirement or an exemption. Commencing the date of permit issuance, the AOP shield shall cover the requirements specified in Table X.1 with respect to the specific emissions units indicated unless applicability of the requirement is triggered by a future action or emissions increase.

*[WAC 173-401-640]*

**S3. Exclusions.** Nothing in this permit shall alter or affect the following:

- a) The provisions of Section 303 of the FCAA (emergency orders), including the authority of the Administrator under that section,
- b) The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance,
- c) The applicable requirements of the acid rain program, consistent with section 408(a) of the FCAA,
- d) The ability of EPA to obtain information from a source pursuant to section 114 of the FCAA, or
- e) The ability of the permitting authority to establish or revise requirements for the use of reasonably available control technology (RACT) as provided in chapter 252, Laws of 1993.

*[WAC 173-401-640]*

*[END OF SECTION]*



**Table X.1 Requirements Determined Inapplicable or Exempt**

**Unless Triggered by Action or Emission Increase**

Note: The requirements listed in the following table include only those requirements for which inapplicability must be based on a determination or comparison of the size, age, emissions or other characteristic of an emission unit with respect to applicability criteria and threshold contained in the requirement. All other requirements are considered obviously inapplicable to the facility, and are not included in the table below.

<b>Requirement</b>	<b>Emissions Unit</b>	<b>Exempt or Inapplicable</b>	<b>Brief Description of Requirement</b>	<b>Basis</b>
1972 NOC approving the fume incinerator Approved 8/24/72	NA	Obsolete	Approval of NOC for fume incinerator	Conditions in NOC approval are now inapplicable. Incinerators have been removed from the facility.
§60.493 of 40 CFR Part 60 Subpart WW	EU4 EU7 EU9 EU11 EU13	Inapplicable	Section §60.493(b)(2) specifies performance test methods and compliance provisions for affected facilities that use a capture system and control device which destroys VOC emissions to comply with the §60.492 VOC standards.	Section §60.493(b)(2) does not apply since the affected units do not use a control device to comply with the §60.492 VOC standards. Compliance with the standards is achieved using low VOC materials.
§60.493(b)(3) of 40 CFR Part 60 Subpart WW	EU4 EU7 EU9 EU11 EU13	Inapplicable	Section §60.493(b)(3) specifies a procedure for calculating emissions at affected facilities that use a capture system and control device which recovers VOC emissions to comply with the §60.492 VOC standards.	Section §60.493(b)(3) does not apply since the affected units do not use a control device to comply with the §60.492 VOC standards.
§60.494 of 40 CFR Part 60 Subpart WW	EU4 EU7 EU9 EU11 EU13	Inapplicable	Section §60.494 contains monitoring requirements for affected facilities that use a capture system and incinerator to comply with the §60.492 VOC standards.	Section §60.494 does not apply since the affected units do not use a control device to comply with the §60.492 VOC standards.

<b>Requirement</b>	<b>Emissions Unit</b>	<b>Exempt or Inapplicable</b>	<b>Brief Description of Requirement</b>	<b>Basis</b>
§60.495(c) of 40 CFR Part 60 Subpart WW	EU4 EU7 EU9 EU11 EU13	Inapplicable	Section §60.495(c) contains reporting and recordkeeping requirements for affected facilities which use a capture and control system to comply with the §60.492 VOC standards.	Section §60.495(c) does not apply since the affected units do not use a control device to comply with the §60.492 VOC standards.
§60.495(a)(3) of 40 CFR Part 60 Subpart WW	EU4 EU7 EU9 EU11 EU13	Inapplicable	Section §60.495(a)(3) contains requirements for affected facilities which use a capture and control system to comply with the §60.492 VOC standards.	Section §60.495(a)(3) does not apply since the affected units do not use a control device to comply with the §60.492 VOC standards.
§60.496(a)(2) of 40 CFR Part 60 Subpart WW	EU4 EU7 EU9 EU11 EU13	Inapplicable	Section §60.496(a)(2) specifies test methods and procedures for affected facilities which use a capture and control system.	Section §60.496(a)(2) does not apply since the affected units do not use a control device to comply with the §60.492 VOC standards.
§60.496(c) of 40 CFR Part 60 Subpart WW	EU4 EU7 EU9 EU11 EU13	Inapplicable	Section §60.496(c) specifies test sampling times for affected facilities which use a capture and control system.	Section §60.496(c) does not apply since the affected units do not use a control device to comply with the §60.492 VOC standards.
§60.7(a)(5) - (7) §60.7(b) – (f) of 40 CFR Part 60 Subpart A	EU4 EU7 EU9 EU11 EU13	Inapplicable	These sections contain general requirements for affected facilities which are required to install and operate continuous emissions monitoring systems.	As Crown is not required to install and operate a continuous emissions monitoring system pursuant to 40CFR Part 60, these sections are not applicable.

<b>Requirement</b>	<b>Emissions Unit</b>	<b>Exempt or Inapplicable</b>	<b>Brief Description of Requirement</b>	<b>Basis</b>
40 CFR Part 60 Subpart IIII: Standards of Performance for Stationary Compression Ignition Internal Combustion Engines	EU6	Inapplicable	The requirements of 40 CFR Part 60 Subpart IIII (Subpart IIII) apply to new, modified, or reconstructed stationary compression ignition internal combustion engines that commenced construction after July 11, 2005 where the fire pump engine is manufactured after July 1, 2006 (April 1, 2006 for non-fire pump engines) or any unit modified or reconstructed after July 11, 2005.	Crown has one stationary compression ignition internal combustion engine. The unit is a 149 hp diesel fire pump engine and was installed on January 1, 2006. Therefore, although the unit commenced construction after July 11, 2005, the unit was manufactured prior to July 1, 2006 and Subpart IIII does not apply.
40 CFR Part 63 Subpart DDDDD	IEU5 IEU6	Inapplicable	The NESHAP for Industrial Commercial and Institutional Boilers and Process Heaters was promulgated on March 21, 2011 and applies to all existing, new or reconstructed industrial, commercial, or institutional boilers and process heaters located at a major source of HAPs.	Crown is operating under a federally enforceable, voluntary limit on emission of hazardous air pollutants (HAPs). This limit establishes 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 DDDDD.
40 CFR Part 63 Subpart EEEE	Facility	Inapplicable	The NESHAP for Organic Liquid Distribution (Non-Gasoline) was promulgated on February 3, 2004 and applies to all new and existing organic liquid distribution (OLD) operations, which are carried out at storage terminals, refineries, crude oil pipeline stations, and various manufacturing facilities located at a major source of HAP.	Crown is operating under a federally enforceable, voluntary limit on emission of hazardous air pollutants (HAPs). This limit establishes 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 EEEE.

<b>Requirement</b>	<b>Emissions Unit</b>	<b>Exempt or Inapplicable</b>	<b>Brief Description of Requirement</b>	<b>Basis</b>
40 CFR Part 63 Subpart JJJJJ	IEU5 IEU6	Exempt	The NESHAP for Industrial, Commercial and Institutional Boilers at Area Sources applies to new and existing industrial, commercial, or institutional boilers that combust coal, biomass, or oil located at area sources of HAPs.	Crown is considered an area source under 40 CFR Part 63, and Crown owns and operates two existing natural gas boilers. Therefore, they are not subject to the requirements of Subpart JJJJJ as gas-fired boilers are exempt per §63.11195(e).
40 CFR Part 63 Subpart KKKK	Facility	Inapplicable	The NESHAP for Surface Coating of Metal Cans was promulgated on November 13, 2003 and applies to all metal can surface coating operations at major sources.	Crown is operating under a federally enforceable, voluntary limit on emission of hazardous air pollutants (HAPs). This limit establishes 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.
40 CFR Part 64	Facility	Inapplicable	Compliance Assurance Monitoring (CAM)– Requires submittal of compliance assurance monitoring plans.	CAM does not apply to the facility based on the exemption provided in section 64.2 of 40 CFR Part 64. Crown’s emission unit is only subject to annual emission caps, and these caps conform to the criteria in Section 70.4(b)(12) of 40 CFR Part 70. Therefore, CAM does not apply.
40 CFR Part 68	Facility	Inapplicable	Risk Management Programs	40 CFR Part 68 applies to any facility that has more than a threshold quantity of a regulated substance in a process, as determined under §68.115. Crown does not use or store any materials above the threshold quantities listed in 40 CFR Part 68.

<b>Requirement</b>	<b>Emissions Unit</b>	<b>Exempt or Inapplicable</b>	<b>Brief Description of Requirement</b>	<b>Basis</b>
40 CFR Part 98 Mandatory Greenhouse Gas (GHG) Reporting (Federal)	Facility	Inapplicable	Federal Mandatory Greenhouse Gas Reporting Rule established reporting requirements for effected sources.	These requirements are not pursuant to either the state or federal Clean Air Acts and, therefore, are not "Applicable Requirements" for purposes of Title V.
91NOC455 (12/23/91)	Former EU2	Obsolete	NOC Approval for end line number 3	Crown no longer manufactures can ends at its Olympia facility. Use of end line number 3 ended on February of 1998, and the equipment used to manufacture can ends was removed from the facility.
95NOC662	IEU6	Obsolete	NOC for Bryan Boiler	At the time of issuance, a NOC was required. However, since then ORCAA has determined that natural gas boilers less than 5 MMBtu/hr were insignificant and did not require NSR. ORCAA rescinded this NOC on April 1, 2016 at Crown's request.
97NOC040	EU7 EU8	Obsolete	NOC for addition of can coating swing line.	This order was superseded by 98NOC021 on June 18, 1998.
98-ERC-018 Order establishing emission reduction credits for discontinuing end line number 3.	Facility-Wide, Former EU2	Obsolete	Order issued for reduction in emissions of VOC caused by terminating operation of aluminum end manufacturing line #3.	Issuance of Approval Order 00MOD063 rescinded the Order of Approval and all its conditions issued on May 14, 1998 (98ERC018).
99NOC033	Facility	Obsolete	Order allowing Crown to retain a third can line a swing line.	The swing line was removed in 2001.

Requirement	Emissions Unit	Exempt or Inapplicable	Brief Description of Requirement	Basis
WAC 173-400-040(3)(b)	Facility	Inapplicable	Emission unit identified as a significant contributor to non-attainment must use reasonable and available control methods to control emission of contaminants for which the area is designated nonattainment.	No emission units at the facility have been identified as a significant contributor to nonattainment.
WAC 173-400-040(8)(b)	Facility	Inapplicable	Fugitive dust sources identified as significant contributors to PM10 nonattainment must apply RACT.	The facility is not located in a PM <sub>10</sub> nonattainment area.
WAC 173-400-100	Facility	Inapplicable	Registration required for listed sources, excluding sources subject to the operating permit program, after EPA grants interim or final approval to the state program	The facility is subject to the operating permit program.
WAC 173-435	Facility	Inapplicable	Emergency episode plan requirements	The facility has not been requested to prepare such a plan.
PSD-87-1 (11/4/87)	Facility-Wide	Obsolete	Prevention of Significant Deterioration (PSD) permit approving a plant expansion and addition of end line	A document titled <i>Number PSD 87-1 Rescission Approval of PSD Rescission</i> was signed on September 13, 2000 granting final approval by the Washington Department of Ecology to rescind PSD-87-1. This order to rescind vacated all conditions that originated from PSD-87-1.

[END OF SECTION]

### **Attachment 1: Insignificant Emission Units**

The Crown Cork and Seal Company (USA), Inc includes the emissions units and other pollutant emitting activities identified in Section III and the insignificant emissions units as defined in the table below. More complete technical descriptions of these units and activities are contained in the associated Crown Cork and Seal's Technical Support Document.

Process	IEU Name	Size/Capacity	Basis for IEU Designation
IEU1	Propane Gas Tank	500 gallons	WAC 173-401-533(2)(d)
IEU2	Space Heating (Eighteen natural gas-fired space heaters)	80,000 Btu/hr each	WAC 173-401-533(2)(r)
IEU3	Storage and Dispense of Acid Solution	Stored in 200-gallon, enclosed, plastic totes	WAC 173-401-533(2)(s)
<i>IEU4</i>	<i>[RECLASSIFIED AS EU]</i>		
IEU5	Cleaver Brooks Natural Gas Fired Boiler	4.0 MMBtu/hr	WAC 173-401-533(e)
IEU6	Bryan Natural Gas Fired Boiler	3.2 MMBtu/hr	WAC 173-401-533(e)
IEU7	10,000 gallon lacquer storage tank	10,000 gallons	WAC 173-401-533(2)(c)
IEU8	10,000 gallon over-varnish storage tank	10,000 gallons	WAC 173-401-533(2)(c)
IEU9	Waste Oil Tank	8,000 gallons	WAC 173-401-532(3)
<i>IEU10</i>	<i>[RECLASSIFIED AS EU]</i>		
IEU11	Lime Storage Silo	1963 ft <sup>3</sup>	WAC 173-401-532(105)