



**AIR OPERATING PERMIT 15AOP1129
ADDENDUM 1
APPLICATION NUMBER 17REV1198**

Minor Modification TSD

On December 30, 2016 Olympic Region Clean Air Agency (ORCAA) received from Crown Cork & Seal (Crown) for a minor permit modification to incorporate changes to can washing solution limits previously approved through Notice of Construction (NOC) # 16MOD1178 into their current Air Operating Permit (AOP).

EPA and affected states notification was initiated as required on January 6, 2017 and the 45-day review period ended February 20, 2017 with no comments received from EPA. The 21-day public notice began with publication in the Permit Register on January 10, 2017 and the public comment period ended January 31, 2017 with no air quality-related comments were received from affected states or the public.

Modifications to the Technical Support Document

The Technical Support Document (TSD) is modified as follows:

7.0 NOTICES OF CONSTRUCTION

NOC# ~~95NOC641~~ (EU3 SUPERSEDED)

On June 20, 1995, under NOC# ~~95NOC641~~, Crown received approval to install a new can washer. The can washers clean and etch the cans prior to coating using hydrofluoric and sulfuric acid washes. The approval order issued for this NOC imposes limitations on the acid concentration of the wash solution used and the total amount of wash solutions used. The conditions of NOC# 641 were superseded by 16MOD1178.

08NOC622 (EU1, EU2 SUPERSEDED)

On October 8, 2008, NOC# 08NOC622 was approved and granted approval to Crown to replace one of the two can washers with a new unit. Although the can washer has a higher capacity than the one it replaced, the bodymakers limit the production capacity of the plant to 3960 cans/min (18 units at 220 cans/min). The conditions of NOC# 08NOC622 were superseded by 16MOD1178.

16MOD1178 (EU1, EU2, EU3)

Beginning in January 2016, Crown began to exceed their can washing material use limit for hydrofluoric acid solution due to a change in the solution formula. In June 2016, Crown requested approval to modify their can washing solution limits with respect to hydrogen fluoride. NOC# 16MOD1178 was issued on December 12, 2016 and superseded the Orders of Approval for NOC# 641 and NOC# 08NOC622.

Table 7.1 Summary of Air Regulatory History

NOC # (date)	NOC CONDITION	DESCRIPTION (for information only)	APPLICABILITY AOP CONDITION #
95-NOC-641 New can washer (6/20/95)	<u>NOC for new can washer (EU3). Superseded by 16MOD1178.</u> (All conditions superseded and removed from TSD.)		
08NOC622 (10/7/08)	<u>NOC for new can washer (EU1, EU2). Superseded by 16MOD1178.</u> (All conditions superseded and removed from TSD.)		
16MOD1178 (12/30/16)	1.	Stationary sources as described in Condition and in applications are approved for operation. Deviations from approved requires pre-approval from ORCAA.	Not an ongoing applicable requirement.
	2.	<p>Can Washing Solution Requirements: The owner or operator shall limit the consumption of sulfuric acid and hydrofluoric acid used to formulate the can washer solutions in the following ways:</p> <ul style="list-style-type: none"> 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; b. The low concentration sulfuric acid shall contain no more than 60 percent sulfuric acid by weight; c. The can washing solution, as purchased, shall contain no more than 5 percent by weight of hydrogen fluoride; and d. 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. 	Applicable Requirement Condition PW14

	3.	Monitoring: The owner or operator shall monitor, on at least a monthly basis, the actual amount of low concentration sulfuric acid (less than 60% sulfuric acid by weight) and high concentration sulfuric acid (greater than 60% sulfuric acid by weight) used in the can washer.	Applicable Requirement Condition M13
	4.	Recordkeeping: The owner or operator shall record the actual amount of low concentration sulfuric acid solution (less than 60% sulfuric acid by weight) and high concentration sulfuric acid solution (greater than 60% sulfuric acid by weight) used in the can washer. The record of the actual amount of low and high concentration sulfuric acid solution shall be maintained as 12-month rolling sums. The owner or operator shall keep records of the actual concentration of sulfuric acid and hydrogen fluoride in the can washing solutions, as purchased.	Applicable Requirement Condition RK15
	5.	Operation and Maintenance Plan: The owner or operator shall update the facility Operations and Maintenance (O&M) plan to include procedures specific to operation and maintenance of the Line 2 Can Washer and Dryer.	Applicable Requirement Condition AR2.1

TABLE 9.1 STATEMENT OF BASIS

CONDITION	REGULATORY BASIS
PW14. Can Washer Solution Requirements	Applicable Requirement Authority: WAC 173-401-605(1) Origin: 95NOC641 Condition 2 ; 00NOC027 Condition 1; <u>16MOD1178</u> 08NOC622 Condition 2
AR2.1 Can Washer O&M	Applicable Requirement Authority: WAC 173-401-605(1) Origin: <u>16MOD1178</u> 08NOC622 Condition 5

M13. Monitoring Compliance with Can Washing Solution Limits	Applicable Requirement Authority: WAC 173-401-615(1)(a) Origin: 95NOC641 Condition 2; 00NOC027 Condition 1; <u>16MOD1178</u> 08NOC622 Condition 3
RK15. Material Use Records	Recordkeeping Conditions Authority: WAC 173-401-615(1)(b)&(2) Origin: 95NOC641 Condition 3 ; 00MOD063 Condition 2; 05NOC420, Condition 2 and 3; <u>16MOD1178</u> 08NOC622 Condition 4; §60.7(f)

Modifications to the Air Operating Permit

Crown proposed modifications to Conditions PW14 and M13 of AOP# 15AOP1129 in order to incorporate the conditions from NOC# 16MOD1178. ORCAA also made changes to the basis only for Conditions AR2.1 and RK15. The AOP conditions are modified as stated below:

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 <u>16MOD1178</u> Condition 2	Can Washer Solution Requirements: The owner or operator shall limit the consumption of sulfuric acid and hydrofluoric acid used to formulate the can washer solution as follows: 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; b) The low concentration sulfuric acid shall contain no more than 60 percent sulfuric acid by weight; 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; d) <u>The can washing solution, as purchased, shall contain no more than 5 percent by weight of</u>	None	M13

		<p>hydrogen fluoride; 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</p> <p>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.</p>		
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REQ #	Applicable Requirement Citations	Applicable Requirement Description (for information purposes only)	Reference Method (if applicable)	Required Monitoring Provisions
AR2.1	<u>16MOD1178 Condition 5</u> 08NOC622 Condition 5	Can Washer O&M: 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)

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 16MOD1178 Condition 3~~]

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; 16MOD1178 ~~08NOC622~~ Condition 4; §60.7(f)]

Jennifer DeMay
February 27, 2017