OhioEPA

State of Ohio Environmental Protection Agency

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January 19, 2007

Mr. Jeff Blaies
Anheuser-Busch Packaging Group
EHS Manager
St Louis, MO 63127-1218

RE: May 31, 2006 facility visit and August 22, 2006 facility inspection; **Notice of Violation**

Dear Mr. Blaies:

Thank you for the courtesy extended to Ohio EPA, Central District Office, during the above referenced inspection and facility visit. The purpose of the inspection was to evaluate compliance with applicable state and federal air regulations. Below is a summary of the inspection findings and items to be addressed.

Emissions Unit K007 (Can Line #1) - Record keeping requirements

A review of on-site records established that Metal Container Corporation (MCC) was not maintaining daily records documenting time periods when the filter was not in service in accordance with the requirements of their Title V Permit issued September 29, 2000.

Specifically, Section A.III.3 of the permit states the following:

"The permittee shall maintain daily records that document any time periods when the filter was not in service during operation of this emissions unit."

Failure to keep the required records is a violation of ORC 3704.05(c) and the Title V operating permit. As per your e-mail dated August 30, 2006, it is CDO's understanding that MCC has corrected this deficiency by adding an item to the Daily Maintenance Report to denote if the filter was used during basecoat operations on emission unit K007. CDO appreciates the timely response to correct the deficiency and now requests that MCC submit, within 30 days of receipt of this letter, the daily records for the months of September, October, and November 2006 for emission unit K007, including information specified in Section A.III.3 of the Title V permit .

Modification of Emission Units

During a site visit with you on December 14th, 2005, my staff discussed with you the possibility of emission units K007-K010 being modified since the time of the last permitted modification pursuant to Air Permit to Install (PTI) number 01-1399. In response to our initial discussions, you submitted a letter dated December 21, 2005 and explained your position regarding this important issue. Subsequently, my staff conducted a detailed review of our files and spoke with key DAPC/CO personnel. On May 31, 2006 my staff met with you to further our discussions concerning the potential modification to lines 1 through 4, also known as emission units K007-K010.

As you have previously pointed out, the definition of modification 3745-31-02(PPP) defines a modification as "any physical change in or change in the method of operation of any air contaminant source that results in an increase in allowable emissions." Based upon the above described discussions and my staff's review of information available in our files, CDO has concluded that one or more physical changes have occurred in each line 1 through 4. These changes include, but are not limited to, the addition of six color capability to all four lines, the removal/replacement of basecoaters, the addition of decorators and certain other changes related to the cappers/bodymakers. Moreover, my staff has discovered that the potential to emit (PTE) for each line, based upon the maximum hourly emission rate, experienced increases above those levels which existed after the last permitted modification.

For example, after the modification which occurred pursuant to PTI 01-1399, issued February 4, 1987, each of the aforementioned emissions units, based upon their respective maximum hourly emission rates, had a PTE as described in the table below.

Emission unit	Maximum hourly emission rate (lbs/hr)	PTE (TPY)
K007	17.39	76.17
K008	16.63	72.84
K009	17.19	75.29
K010	18.68	81.82

Based upon the coating usage information in our files, my staff has determined that at some point on or about 1991, the PTE for emissions units K007-K010 increased to the levels described in the table below.

Emission unit	Maximum hourly emission rate (lbs/hr)	PTE (TPY)
K007	21.79	95.44
K008	21.79	95.44
K009	21.79	95.44
K010	28.71	125.75

The increase in PTE for each emissions units K007-K010 represents a modification, as defined above, to each emissions unit.

OAC rule 3745-31-02 states "Except as provided in rule 3745-31-03 of the Administrative Code, no person shall cause, permit, or allow the installation of a new source of air pollutants or a new disposal system as defined in division (G) of section 6111.01 of the Revised Code, or cause, permit, or allow the modification of an air contaminant source or a disposal system, or establish or modify a solid waste disposal facility or an infectious waste treatment facility, without first obtaining a permit to install from the director." As a result, CDO has concluded that Metal Container Corporation has modified emission units K007-K010 in violation of the aforementioned rule. In order to address this deficiency, CDO is now requesting that MCC submit a complete Air Permit to Install application for each affected emissions unit. CDO is further requesting that MCC include a comprehensive Best Available Control study which evaluates the feasibility and cost effectiveness of add on controls for capturing and controlling the organic compound emissions from emissions units one through four. Please refer to Ohio EPA Engineering Guide 46 for more information regarding the requested BAT study.

CDO is now requesting that MCC submit the above requested information within 60 days of receipt of this letter. It is important that all compliance deficiencies be resolved as expeditiously as possible. Please note that Ohio EPA has the authority to seek civil penalties as provided in section 3704.06 of the ORC. This letter or information submitted pursuant to this letter does not constitute a waiver of Ohio EPA's authority to seek civil penalties or other relief as provided in the ORC. The decision on whether or not to seek such penalties will be made by Ohio EPA at a later date.

If you have any questions, please contact Todd Scarborough of my staff at (614) 728-3813.

Sincerely,

Michael Riggleman

Mike Riggleman
Supervisor, Permits and Compliance
Division of Air Pollution Control
Central District Office

Enclosures

c. Isaac A. Robinson, III, Ohio EPA, DAPC/CDO
Luke Mountjoy, Ohio EPA, DAPC/CDO
Todd Scarborough, Ohio EPA, DAPC/CDO
Matt Phillips, Metal Container Corporation
CDO/DAPC File

MR/TS/slj Metal Container Corp 2006 Inspection

Evaluator(s): Luke Mountjoy and Todd Scarborough

PCE Date(s): 8/22/06 Arrival Time: 10am Departure time: 1pm Announced? Y Yes __ No

_____ Arrival Time: _____ Departure time: _____ Announced? __ Yes __ No

_____ Arrival Time: _____ Departure time: _____ Announced? __ Yes __ No

FCE Date: _____

OHIO EPA - CDO: Facility Evaluation Form

Facility Information:

Facility Name: Metal Container Corp. Facility ID: 0125040914

Facility Address: 350 McCormick Boulevard Facility County: Franklin

Facility City: Columbus Phone Number: _____

Facility Zip code: 43213-1586

Facility Contact(s): Mathew Phillips Title(s): Env Health & Safety Manager

Other representative(s): Jeff Blaise Title(s): Env Health & Safety Manager III

Facility Classification:

Facility Type: (circle all that apply) MegaTV **TitleV** SMPTI FESOP Non-HP

Applicable Programs: (circle) PSD NESHAP **NSPS** MACT

Pollutant(s) regulated at facility: (Circle all that apply)

PE	fluorides (excluding hydrogen fluoride)
OC/VOC	sulfuric acid mist
SO2	hydrogen sulfide
CO	total reduced sulfur
NOx	NMOCs
Pb	mercury
HAP(s)	beryllium
	Vinyl chloride

Facility Evaluation:

Fee reports submitted? X Yes __ No (Due April 15 of preceding year for HP facilities)

TV Compliance Cert (if applicable): Submitted? X Yes __ No

Compliant? __ Cont X Int Comply __ No __ Pending

Has there been enforcement against company in past 10 years? __ Yes X No

If yes, what units?

Did facility comply with facility-wide operational, record keeping & reporting requirements? X Yes __ No __ N/A

Memo: _____

FCE Summary on back...

Full Compliance Evaluation (FCE) Summary

(To be completed when FCE is finished)

Based on PCE and FCE evaluation findings, does it appear that the facility is in compliance with applicable requirements?

___ Yes

X No If no, were non-compliant issues discussed with the permittee?

X Yes

___ No (list issues not discussed)

Memo: See Inspection Letter.

Inspector(s) Signature: _____ Date: _____

Points to Remember:

- A full compliance evaluation (FCE) has been completed when all non-insignificant units have been fully evaluated at Title V facilities or all non-registration units have been fully evaluated at non-Title V facilities.

- A follow-up letter is required for all FCEs and for all PCEs during which serious violations were discovered. The follow-up letter should identify all non-compliance situations and cite all applicable rules and regulations which have been violated. The follow-up letter(s) should be attached to this evaluation form.

- Each permit that is needed to fully evaluate an emissions unit is considered part of the evaluation form and should be returned to the appropriate file folder when the evaluation is complete. It may be helpful to attach a copy of the permit(s) to this evaluation form.

- When entering data into CETA, be aware that **Bold** section titles directly correspond to rows on CETA's Compliance Monitoring page. If there are any questions when entering the data, feel free to contact appropriate supervisor.

- The review of "maintenance records" on the Emission Unit Evaluation Form is optional unless specified in a permit. It may be beneficial and should be documented if reviewed. An example of "significant maintenance" would be changing of bags in a baghouse.

- VE observations need to be taken for any unit that is subject to a VE limitation per OAC rule 3745-17-07, 3745-31(BAT) or NSPS. The minimum amount of time to take a VE reading is 13 minutes. When no VE reading was taken during a PCE, indicate the reason why VEs were not conducted at the time of inspection and estimate when VEs will be taken in the future to confirm compliance with the applicable requirement. The VE form(s) should be attached to this evaluation form.

  Possible reasons not to take a VE during a site visit are:

  1 weather prohibited readings a the time of the inspection (follow up readings are necessary)
  2 lack of daylight prohibited readings during time of inspection (follow up readings are necessary)
  3 not enough time (follow up readings are necessary)
  4 inspector not certified to read Method 9 (follow up readings are necessary)
  5 unit not operating (follow up readings are necessary)
  6 EU located in area of facility where building or other obstructions prohibit proper positioning for Method 9
  7 inherently clean emissions unit
  8 facility personnel conducted the Method 9 observations
  9 facility hired outside consultants to observe Method 9 readings
  10 no VEs observed during past inspections
  11 safety issues prohibit reading of Method 9
  12 emissions unit is a spray booth equipped with properly maintained filters
  13 unit has a continuous opacity monitoring (COMS) system
  14 review of facility daily record checks or parametric monitoring of the EU and APCE indicates compliance
  15 moisture in the plume
  16 stack(s) vents inside the building
  17 other, please specify above

Evaluator: Luke Mountjoy & Todd Scarborough
PCE Date(s): 8/22/06
Entered into CETA? X Yes

Premise #: 0125040914
Facility Name: Franklin

OHIO EPA - CDO: Emission Unit Evaluation Form

Emission Unit ID #: K007 Description: Can Line No.1

Emission Unit Permit(s):

Proper Permits Issued:

Installation Date: 3/77 PTI # 01-1399 Issue Date: 02/04/87

Type of permit(s)* (circle or check all that apply): X Title V ___ SM ___ PSD ___ FESOP ___ PTO

List regulated pollutant(s): VOC, PM

Memo:

* If installation or operating permit has not issued final, then explain status in the Memo.

Emission Unit Report(s):

CEM/COM: Were all CEM/COM reports submitted? ___ Yes ___ No ___ Unkn X N/A

Did the CEM/COM reports indicate non-compliance with permit limit(s)? ___ Yes ___ No ___ Unkn X N/A

Memo:

Deviation Reports: Were all deviation reports submitted? X Yes ___ No ___ Unk ___ N/A

Did reports indicate non-compliance with permit limitations? ___ Yes X No ___ Unkn

Memo

EU Specific Reports: Were all reports submitted? X Yes ___ No ___ Unkn ___ N/A

Did reports indicate non-compliance with permit limitations? ___ Yes X No ___ Unkn

Memo:

Other Reports: Were all reports submitted? ___ Yes ___ No ___ Unk X N/A

Did reports indicate non-compliance with permit limitations? ___ Yes ___ No X Unkn

Memo:

Emission Unit Evaluation Findings:

VE observed:

Were VE observations taken in accordance with Method 9 or Method 22?

___ Yes (Data attached) ___ No ___ Unkn X N/A

If no, why not? (See Facility Inspection Form for reasons and further explanation)

Memo:

Review of operational logs & usage records:

Were operational logs and/or usage records maintained in accordance with applicable permit(s)?

___ Yes X No ___ Not reviewed ___ Unkn ___ N/A

Memo: Facility did not maintain daily records for when the filter was not in use. Section A.III.3 of permit.

Observed actual operating parameters:

Was unit operating at time of inspection? X Yes ___ No ___ Unkn

If no, when did it last operate? ___

Operating parameters observed at time of inspection: standard

Was emission unit operating in compliance with permit T&Cs? X Yes ___ No ___ Unkn ___ N/A

Has equipment been changed, altered, or replaced since last permit app? X Yes ___ No ___ Unkn

If yes, explain: **modification of line, increase potential to emit. See Inspection Letter.**

Have any operating parameters or raw materials been changed/altered since last permit app ? X Yes ___ No ___ Unkn

If yes, explain: **modification of line, increase potential to emit.**

Memo: See Inspection Form.

Control equipment parameters assessed:

Description of air pollution control equipment (APCE): **filter**

Was APCE operating at time of inspection? ___ Yes ___ No ___ Unkn X N/A

Operating parameters observed at time of inspection: ___

Was APCE operating in compliance with permit T&Cs? ___ Yes ___ No ___ Unkn X N/A

Were maintenance records for APCE reviewed during inspection? * ___ Yes X No ___ Unkn

If yes, when was most recent significant maintenance? ___

*See Points to Remember on Facility Evaluation Form for further explanation.

Does the level and frequency of maintenance appear adequate? X Yes ___ No ___ Unkn

Has a Compliance Assurance Monitoring (CAM) plan been submitted for this APCE?

___ Yes ___ No X Unkn ___ N/A

If yes, is the permittee following the CAM plan? ___ Yes ___ No ___ Unkn

Memo: ___

Did any permit (PTI, TV, PTO) require performance testing for this unit? ___ Yes X No ___ Unkn

If yes, what pollutant(s)? ___

If yes, was testing performed in accordance with the applicable permit? ___ Yes ___ No ___ Unkn

Memo: N/A

Was CEM data reviewed during the inspection? ___ Yes ___ No ___ Unkn

If yes, which pollutant(s)? **N/A**

If yes, was unit in compliance with applicable requirements? ___ Yes ___ No ___ Unkn X N/A

Memo: ___

Evaluator: Luke Mountjoy & Todd Scarborough
PCE Date(s): 8/22/06
Entered into CETA? _Y_ Yes

Premise #: 0125040914
Facility Name: Metal Container Corp

OHIO EPA - CDO: Emission Unit Evaluation Form

Emission Unit ID #: K008 Description: Can Line No.2

Emission Unit Permit(s):

Proper Permits Issued:

Installation Date: 3/77 PTI # 01-1399 Issue Date: 02/04/87

Type of permit(s)* (circle or check all that apply): _X_ Title V ___ SM ___ PSD ___ FESOP ___ PTO

List regulated pollutant(s): VOC, PM

Memo:

* If installation or operating permit has not issued final, then explain status in the Memo.

Emission Unit Report(s):

CEM/COM: Were all CEM/COM reports submitted? ___ Yes ___ No ___ Unkn _X_ N/A

Did the CEM/COM reports indicate non-compliance with permit limit(s)? ___ Yes ___ No ___ Unkn _X_ N/A

Memo:

Deviation Reports: Were all deviation reports submitted? _X_ Yes ___ No ___ Unk ___ N/A

Did reports indicate non-compliance with permit limitations? ___ Yes _X_ No ___ Unkn

Memo

EU Specific Reports: Were all reports submitted? _X_ Yes ___ No ___ Unkn ___ N/A

Did reports indicate non-compliance with permit limitations? ___ Yes _X_ No ___ Unkn

Memo:

Other Reports: Were all reports submitted? ___ Yes ___ No ___ Unk _X_ N/A

Did reports indicate non-compliance with permit limitations? ___ Yes ___ No _X_ Unkn

Memo:

Emission Unit Evaluation Findings:

VE observed:

Were VE observations taken in accordance with Method 9 or Method 22?

___ Yes (Data attached) ___ No ___ Unkn _X_ N/A

If no, why not? (See Facility Inspection Form for reasons and further explanation)

Memo:

Review of operational logs & usage records:

Were operational logs and/or usage records maintained in accordance with applicable permit(s)?

___ Yes _X_ No ___ Not reviewed ___ Unkn ___ N/A

Memo: Permit requires Monthly Reporting per emission unit, but they have coating logs for entire facility. Records

indicate compliance.

Observed actual operating parameters:

Was unit operating at time of inspection? X Yes ___ No ___ Unkn

If no, when did it last operate? ___

Operating parameters observed at time of inspection: standard

Was emission unit operating in compliance with permit T&Cs? X Yes ___ No ___ Unkn ___ N/A

Has equipment been changed, altered, or replaced since last permit app? X Yes ___ No ___ Unkn

If yes, explain: **modification of line, increase potential to emit. See Inspection Letter.**

Have any operating parameters or raw materials been changed/altered since last permit app ? X Yes ___ No ___ Unkn

If yes, explain: **modification of line, increase potential to emit.**

Memo: **See Inspection Letter**

Control equipment parameters assessed:

Description of air pollution control equipment (APCE): **filter**

Was APCE operating at time of inspection? X Yes ___ No ___ Unkn X N/A

Operating parameters observed at time of inspection: ___

Was APCE operating in compliance with permit T&Cs? X Yes ___ No ___ Unkn X N/A

Were maintenance records for APCE reviewed during inspection? * ___ Yes X No ___ Unkn

If yes, when was most recent significant maintenance? ___

*See Points to Remember on Facility Evaluation Form for further explanation.

Does the level and frequency of maintenance appear adequate? X Yes ___ No ___ Unkn

Has a Compliance Assurance Monitoring (CAM) plan been submitted for this APCE?

___ Yes ___ No X Unkn ___ N/A

If yes, is the permittee following the CAM plan? ___ Yes ___ No ___ Unkn

Memo: Unit does not operate without filter.

Did any permit (PTI, TV, PTO) require performance testing for this unit? ___ Yes X No ___ Unkn

If yes, what pollutant(s)? ___

If yes, was testing performed in accordance with the applicable permit? ___ Yes ___ No ___ Unkn

Memo: N/A

Was CEM data reviewed during the inspection? ___ Yes ___ No ___ Unkn

If yes, which pollutant(s)? **N/A**

If yes, was unit in compliance with applicable requirements? ___ Yes ___ No ___ Unkn X N/A

Memo: ___

Evaluator: Luke Mountjoy & Todd Scarborough
PCE Date(s): 8/22/06
Entered into CETA? X Yes

Premise #: 0125040914
Facility Name: Metal Container Corp

OHIO EPA - CDO: Emission Unit Evaluation Form

Emission Unit ID #: K009 Description: Can Line No.3

Emission Unit Permit(s):

Proper Permits Issued:

Installation Date: 3/77 PTI # 01-1399 Issue Date: 02/04/87

Type of permit(s)* (circle or check all that apply): X Title V ___ SM ___ PSD ___ FESOP ___ PTO

List regulated pollutant(s): VOC, PM

Memo:

* If installation or operating permit has not issued final, then explain status in the Memo.

Emission Unit Report(s):

CEM/COM: Were all CEM/COM reports submitted? ___ Yes ___ No ___ Unkn X N/A

Did the CEM/COM reports indicate non-compliance with permit limit(s)? ___ Yes ___ No ___ Unkn X N/A

Memo:

Deviation Reports: Were all deviation reports submitted? X Yes ___ No ___ Unk ___ N/A

Did reports indicate non-compliance with permit limitations? ___ Yes X No ___ Unkn

Memo

EU Specific Reports: Were all reports submitted? X Yes ___ No ___ Unkn ___ N/A

Did reports indicate non-compliance with permit limitations? ___ Yes X No ___ Unkn

Memo:

Other Reports: Were all reports submitted? ___ Yes ___ No ___ Unk X N/A

Did reports indicate non-compliance with permit limitations? ___ Yes ___ No X Unkn

Memo:

Emission Unit Evaluation Findings:

VE observed:

Were VE observations taken in accordance with Method 9 or Method 22?

___ Yes (Data attached) ___ No ___ Unkn X N/A

If no, why not? (See Facility Inspection Form for reasons and further explanation)

Memo: Prior logs show no VE's, process is not conducive to creating VE.

Review of operational logs & usage records:

Were operational logs and/or usage records maintained in accordance with applicable permit(s)?

___ Yes X No ___ Not reviewed ___ Unkn ___ N/A

Memo: Permit requires Monthly Reporting per emission unit, but they have coating logs for entire facility. Records

indicate compliance.

Observed actual operating parameters:

Was unit operating at time of inspection? X Yes ___ No ___ Unkn

If no, when did it last operate? ___

Operating parameters observed at time of inspection: standard

Was emission unit operating in compliance with permit T&Cs? X Yes ___ No ___ Unkn ___ N/A

Has equipment been changed, altered, or replaced since last permit app? X Yes ___ No ___ Unkn

If yes, explain: **modification of line, increase potential to emit. See Inspection Letter.**

Have any operating parameters or raw materials been changed/altered since last permit app ? X Yes ___ No ___ Unkn

If yes, explain: **modification of line, increase potential to emit.**

Memo: See inspection Letter.

Control equipment parameters assessed:

Description of air pollution control equipment (APCE): **filter**

Was APCE operating at time of inspection? X Yes ___ No ___ Unkn X N/A

Operating parameters observed at time of inspection: ___

Was APCE operating in compliance with permit T&Cs? X Yes ___ No ___ Unkn ___ N/A

Were maintenance records for APCE reviewed during inspection? * ___ Yes X No ___ Unkn

If yes, when was most recent significant maintenance? ___

*See Points to Remember on Facility Evaluation Form for further explanation.

Does the level and frequency of maintenance appear adequate? X Yes ___ No ___ Unkn

Has a Compliance Assurance Monitoring (CAM) plan been submitted for this APCE?

___ Yes ___ No X Unkn ___ N/A

If yes, is the permittee following the CAM plan? ___ Yes ___ No ___ Unkn

Memo: Unit does not operate without filter.

Did any permit (PTI, TV, PTO) require performance testing for this unit? ___ Yes X No ___ Unkn

If yes, what pollutant(s)? ___

If yes, was testing performed in accordance with the applicable permit? ___ Yes ___ No ___ Unkn

Memo: N/A

Was CEM data reviewed during the inspection? ___ Yes ___ No ___ Unkn

If yes, which pollutant(s)? **N/A**

If yes, was unit in compliance with applicable requirements? ___ Yes ___ No ___ Unkn X N/A

Memo: ___

Evaluator: Luke Mountjoy & Todd Scarborough
PCE Date(s): 8/22/06
Entered into CETA? X Yes

Premise #: 0125040914
Facility Name: Metal Container Corp

OHIO EPA - CDO: Emission Unit Evaluation Form

Emission Unit ID #: K010 Description: Can Line No.4

Emission Unit Permit(s):

Proper Permits Issued:

Installation Date: 3/77 PTI # 01-1399 Issue Date: 02/04/87

Type of permit(s)* (circle or check all that apply): X Title V ___ SM ___ PSD ___ FESOP ___ PTO

List regulated pollutant(s): VOC, PM

Memo:

* If installation or operating permit has not issued final, then explain status in the Memo.

Emission Unit Report(s):

CEM/COM: Were all CEM/COM reports submitted? ___ Yes ___ No ___ Unkn X N/A

Did the CEM/COM reports indicate non-compliance with permit limit(s)? ___ Yes ___ No ___ Unkn X N/A

Memo:

Deviation Reports: Were all deviation reports submitted? X Yes ___ No ___ Unk ___ N/A

Did reports indicate non-compliance with permit limitations? ___ Yes X No ___ Unkn

Memo

EU Specific Reports: Were all reports submitted? X Yes ___ No ___ Unkn ___ N/A

Did reports indicate non-compliance with permit limitations? ___ Yes X No ___ Unkn

Memo:

Other Reports: Were all reports submitted? ___ Yes ___ No ___ Unk X N/A

Did reports indicate non-compliance with permit limitations? ___ Yes ___ No X Unkn

Memo:

Emission Unit Evaluation Findings:

VE observed:

Were VE observations taken in accordance with Method 9 or Method 22?

___ Yes (Data attached) ___ No ___ Unkn X N/A

If no, why not? (See Facility Inspection Form for reasons and further explanation)

Memo: Prior logs show no VE's, process is not conducive to creating VE.

Review of operational logs & usage records:

Were operational logs and/or usage records maintained in accordance with applicable permit(s)?

___ Yes ___ No ___ Not reviewed ___ Unkn X N/A

Memo: Permit requires monthly monitoring, but facility depicts data in Annual format.

Observed actual operating parameters:

Was unit operating at time of inspection? X Yes ___ No ___ Unkn

If no, when did it last operate? ___

Operating parameters observed at time of inspection: standard

Was emission unit operating in compliance with permit T&Cs? X Yes ___ No ___ Unkn ___ N/A

Has equipment been changed, altered, or replaced since last permit app? X Yes ___ No ___ Unkn

If yes, explain: **modification of line, increase potential to emit. See Inspection Letter.**

Have any operating parameters or raw materials been changed/altered since last permit app ? ___ Yes X No ___ Unkn

If yes, explain: **modification of line, increase potential to emit.**

Memo: **See Inspection Letter.**

Control equipment parameters assessed:

Description of air pollution control equipment (APCE): **filter**

Was APCE operating at time of inspection? X Yes ___ No ___ Unkn ___ N/A

Operating parameters observed at time of inspection: ___

Was APCE operating in compliance with permit T&Cs? X Yes ___ No ___ Unkn ___ N/A

Were maintenance records for APCE reviewed during inspection? * ___ Yes X No ___ Unkn

If yes, when was most recent significant maintenance? ___

*See Points to Remember on Facility Evaluation Form for further explanation.

Does the level and frequency of maintenance appear adequate? X Yes ___ No ___ Unkn

Has a Compliance Assurance Monitoring (CAM) plan been submitted for this APCE?

___ Yes ___ No X Unkn ___ N/A

If yes, is the permittee following the CAM plan? ___ Yes ___ No ___ Unkn

Memo: ___

Did any permit (PTI, TV, PTO) require performance testing for this unit? ___ Yes X No ___ Unkn

If yes, what pollutant(s)? ___

If yes, was testing performed in accordance with the applicable permit? ___ Yes ___ No ___ Unkn

Memo: N/A

Was CEM data reviewed during the inspection? ___ Yes ___ No ___ Unkn

If yes, which pollutant(s)? **N/A**

If yes, was unit in compliance with applicable requirements? ___ Yes ___ No ___ Unkn X N/A

Memo: ___

Evaluator: Luke Mountjoy & Todd Scarborough
PCE Date(s): 8/22/06
Entered into CETA? X Yes

Premise #: 0125040914
Facility Name: Metal Container Corp

OHIO EPA - CDO: Emission Unit Evaluation Form

Emission Unit ID #: K011 Description: Two inside re-spray machines & one oven (4.0 mmBtu/hr).

Emission Unit Permit(s):

Proper Permits Issued:

Installation Date: 3/77 PTI # 01-1399 Issue Date: 02/04/87

Type of permit(s)* (circle or check all that apply): X Title V ___ SM ___ PSD ___ FESOP ___ PTO

List regulated pollutant(s): VOC, PM

Memo:

* If installation or operating permit has not issued final, then explain status in the Memo.

Emission Unit Report(s):

CEM/COM: Were all CEM/COM reports submitted? ___ Yes ___ No ___ Unkn X N/A

Did the CEM/COM reports indicate non-compliance with permit limit(s)? ___ Yes ___ No ___ Unkn X N/A

Memo:

Deviation Reports: Were all deviation reports submitted? ___ Yes ___ No ___ Unk X N/A

Did reports indicate non-compliance with permit limitations? ___ Yes X No ___ Unkn

Memo

EU Specific Reports: Were all reports submitted? ___ Yes X No ___ Unkn ___ N/A

Did reports indicate non-compliance with permit limitations? ___ Yes X No ___ Unkn

Memo: Unit has not been in operation since previous inspection 3/20/03.

Other Reports: Were all reports submitted? ___ Yes ___ No ___ Unk X N/A

Did reports indicate non-compliance with permit limitations? ___ Yes ___ No X Unkn

Memo:

Emission Unit Evaluation Findings:

VE observed:

Were VE observations taken in accordance with Method 9 or Method 22?

___ Yes (Data attached) ___ No ___ Unkn X N/A

If no, why not? (See Facility Inspection Form for reasons and further explanation)

Memo: Review of operation and facility checks indicate unit has been shutdown. No VE's created for the unit.

Review of operational logs & usage records:

Were operational logs and/or usage records maintained in accordance with applicable permit(s)?

___ Yes X No ___ Not reviewed ___ Unkn ___ N/A

Memo: Permit requires Monthly Reporting. Unit has not operated since at least April of 2002.

No records of operation can be found for unit. If operation does re-start, record keeping will apply.

Observed actual operating parameters:

Was unit operating at time of inspection? X Yes ___ No ___ Unkn

If no, when did it last operate? ___

Operating parameters observed at time of inspection: standard

Was emission unit operating in compliance with permit T&Cs? X Yes ___ No ___ Unkn ___ N/A

Has equipment been changed, altered, or replaced since last permit app? X Yes ___ No ___ Unkn

If yes, explain: **modification of line, increase potential to emit. See Inspection Letter.**

Have any operating parameters or raw materials been changed/altered since last permit app ? ___ Yes X No ___ Unkn

If yes, explain: **modification of line, increase potential to emit.**

Memo: **See Inspection Letter.**

Control equipment parameters assessed:

Description of air pollution control equipment (APCE): **filter**

Was APCE operating at time of inspection? X Yes ___ No ___ Unkn X N/A

Operating parameters observed at time of inspection: ___

Was APCE operating in compliance with permit T&Cs? X Yes ___ No ___ Unkn ___ N/A

Were maintenance records for APCE reviewed during inspection? * ___ Yes X No ___ Unkn

If yes, when was most recent significant maintenance? ___

*See Points to Remember on Facility Evaluation Form for further explanation.

Does the level and frequency of maintenance appear adequate? X Yes ___ No ___ Unkn

Has a Compliance Assurance Monitoring (CAM) plan been submitted for this APCE?

___ Yes ___ No X Unkn ___ N/A

If yes, is the permittee following the CAM plan? ___ Yes ___ No ___ Unkn

Memo: Unit does not operate without filter.

Did any permit (PTI, TV, PTO) require performance testing for this unit? ___ Yes X No ___ Unkn

If yes, what pollutant(s)? ___

If yes, was testing performed in accordance with the applicable permit? ___ Yes ___ No ___ Unkn

Memo: N/A

Was CEM data reviewed during the inspection? ___ Yes ___ No ___ Unkn

If yes, which pollutant(s)? **N/A**

If yes, was unit in compliance with applicable requirements? ___ Yes ___ No ___ Unkn X N/A

Memo: ___