



Director of Compliance and Enforcement  
Bay Area Air Quality Management District  
375 Beale Street, Suite 600  
San Francisco, CA 94105

Ardagh Metal Packaging N.A.  
2433 Crocker Circle  
Fairfield, CA 94533

Attention: Title V Reports

TV Tracking #: 675

T: (707) 437-6645

[ardaghgroup.com](http://ardaghgroup.com)

January 17, 2022

1.  RECEIVED IN  
ENFORCEMENT: 01/31/2023

SUBJECT: Ardagh Metal Packaging, Fairfield - Plant # A1665  
Semi-Annual, Monitoring Verification Report [Second half - 2022](#)

Dear Sir or Madam:

Per the requirements of our Major Facility Review Air Operating Permit, enclosed please find the completed Title V Semi-Annual Monitoring Verification Report for our above referenced facility located in Fairfield, California. Reporting period [7/01/2022 through 12/31/2022](#).

I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in these documents are true, accurate and complete.

If you have any questions or require additional information, please contact me or my plant representative:

[David.Trujillo@ArdaghGroup.com](mailto:David.Trujillo@ArdaghGroup.com) (707) 437-7401

[Eric.Berkheimer@ArdaghGroup.com](mailto:Eric.Berkheimer@ArdaghGroup.com) (707) 249-4909

Regards,

David Trujillo  
Plant Manager

**Table VII-A  
Applicable Limits and Compliance Monitoring Requirements  
S-1 : Roller Coater, Line 1 & Line 3**

Type of Limit	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance
VOC	BAAQMD 8-11-302 (alternative to 8-11-301.3)	Y		Abatement Device efficiency $\geq 90\%$	BAAQMD 8-11-504	C	Temperature of thermal oxidizer unit	YES
VOC	NSPS Subpart WW, 60.492 (a)	Y		Exterior Base Coat: 0.29 kilogram of VOC per liter (2.42 lb./gal) of coating solids	NSPS Subpart WW, 60.493 (b)	P/M	Coating records, Initial performance test, Monthly operating parameters	YES
VOC	Condition #391, part 1	Y		34.6885 tons/yr, facility wide limit	Condition #391, part 12	P/M	Monthly calculation of VOC emissions from Coating Lines 1 and 3	YES
HAP	Condition #391, part 1	Y		<10 tons/yr., single HAP and <25 tons/yr., any combination of HAPs	Condition #391, part 12	P/M	Monthly calculation of HAP emissions from Coating Lines 1 and 3	YES

**Table VII-B**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S-2: Coater Oven, Line 1 & Line 3**

Type of Limit	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance
VOC	BAAQMD 8-11-302 (alternative to 8-11-301.3)	Y		Abatement Device efficiency $\geq 90\%$	BAAQMD 8-11-504	C	Temperature of thermal oxidizer unit	YES
VOC	NSPS Subpart WW, 60.492 (a)	Y		Exterior Base Coat: 0.29 kilogram of VOC per liter (2.42 lb/gal) of coating solids	NSPS Subpart WW, 60.493 (b)	P/M	Coating records, Initial performance test, Monthly operating parameters	YES
	Condition #391, part 1	Y		34.6885 tons/yr, facility wide limit	Condition #391, part 12	P/M	Monthly calculation of VOC emissions from Coating Lines 1 and 3	YES
	Condition #391, part 5	Y		Abatement Device efficiency $\geq 95\%$	Condition #391, part 7	C	Temperature of thermal oxidizer unit	YES
	Condition #391, part 6	Y		Minimum thermal oxidizer Temperature of 1600 degrees F	Condition #391, part 7	C	Temperature of thermal oxidizer unit	YES
HAP	Condition #391, part 1	Y		<10 tons/yr., single HAP and <25 tons/yr., any combination of HAPs	Condition #391, part 12	P/M	Monthly calculation of HAP emissions from Coating Lines 1 and 3	YES
Periods of Inoperation for Parametric Monitors	BAAQMD 1-523.2	Y		15 consecutive days/incident and 30 calendar days/12-month period	BAAQMD 1-523.4	P/D	Operating Records for All Parametric Monitors	YES

**Table VII-C**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S-3, S-9: Printers, Line 1 & Line 2**

Type of Limit	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance
VOC	BAAQMD 8-11-302 (alternative to 8-11-301.3, 301.10)	Y		Abatement Device efficiency $\geq 90\%$	BAAQMD 8-11-504	C	Temperature of thermal oxidizer unit	YES
VOC	NSPS Subpart WW, 60.492 (b)	Y		Overvarnish: 0.46 kilogram of VOC per liter (3.84 lb/gal) of coating solids	NSPS Subpart WW, 60.493 (b)	P/M	Coating records, Initial performance test, Monthly operating parameters	YES
	Condition #391, part 1	Y		34.6885 tons/yr, facility wide limit	Condition #391, part 12	P/M	Monthly calculation of VOC emissions from Coating Lines 1 and 2	YES
HAP	Condition #391, part 1	Y		<10 tons/yr., single HAP and <25 tons/yr., any combination of HAPs	Condition #391, part 12	P/M	Monthly calculation of HAP emissions from Coating Lines 1 and 2	YES
Periods of Inoperation for Parametric Monitors	BAAQMD 1-523.2	Y		15 consecutive days/incident and 30 calendar days/12-month period	BAAQMD 1-523.4	P/D	Operating Records for All Parametric Monitors	YES

**Applicable Limits and Compliance Monitoring Requirements  
S-31: Printer, Line 3**

Type of Limit	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance
VOC	BAAQMD 8-11-302 (alternative to 8-11-301.3, 301.10)	Y		Abatement Device efficiency $\geq 90\%$	BAAQMD 8-11-504	C	Temperature of thermal oxidizer unit	YES
VOC	NSPS Subpart WW, 60.492 (b)	Y		Overvarnish: 0.46 kilogram of VOC per liter (3.84 lb/gal) of coating solids	NSPS Subpart WW, 60.493 (b)	P/M	Coating records, Initial performance test, Monthly operating parameters	YES
	Condition #391, part 1	Y		34.6885 tons/yr, facility wide limit	Condition #391, part 12	P/M	Monthly calculation of VOC emissions from Coating Lines 1 and 2	YES
HAP	Condition #391, part 1	Y		<10 tons/yr, single HAP and <25 tons/yr, any combination of HAPs	Condition #391, part 12	P/M	Monthly calculation of HAP emissions from Coating Lines 1 and 2	YES
Periods of Inoperation for Parametric Monitors	BAAQMD 1-523.2	Y		15 consecutive days/incident and 30 calendar days/12-month period	BAAQMD 1-523.4	P/D	Operating Records for All Parametric Monitors	YES

**Table VII-D**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S-4, S-10: Printer Ovens Line 1 & Line 2**

Type of Limit	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance
VOC	BAAQMD 8-11-302 (alternative to 8-11-301.3, 301.10)	Y		Abatement Device efficiency $\geq 90\%$	BAAQMD 8-11-504	C	Temperature of thermal oxidizer unit	YES
	NSPS Subpart WW, 60.492 (b)	Y		Overvarnish / Clear Basecoat: 0.46 kilogram of VOC per liter (3.84 lb/gal) of coating solids	NSPS Subpart WW, 60.493 (b)	P/M	Coating records, Initial performance test, Monthly operating parameters	YES
	Condition #391, part 1	Y		34.6885 tons/yr, facility wide limit	Condition #391, part 12	P/M	Monthly calculation of VOC emissions from Coating Lines 1 and 2	YES
VOC	Condition #391, part 5	Y		Abatement Device efficiency $\geq 95\%$	Condition #391, part 7	C	Temperature of thermal oxidizer unit	YES
	Condition #391, part 6	Y		Minimum thermal oxidizer Temperature of 1600 degrees F	Condition #391, part 7	C	Temperature of thermal oxidizer unit	YES
HAP	Condition #391, part 1	Y		<10 tons/yr., single HAP and <25 tons/yr., any combination of HAPs	Condition #391, part 12	P/M	Monthly calculation of HAP emissions from Coating Lines 1 and 2	YES
Periods of Inoperation for Parametric Monitors	BAAQMD 1-523.2	Y		15 consecutive days/incident and 30 calendar days/12-month period	BAAQMD 1-523.4	P/D	Operating Records for All Parametric Monitors	YES

**Applicable Limits and Compliance Monitoring Requirements  
S-32: Printer Oven Line 3**

Type of Limit	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance
VOC	BAAQMD 8-11-302 (alternative to 8-11-301.3, 301.10)	Y		Abatement Device efficiency $\geq 90\%$	BAAQMD 8-11-504	C	Temperature of thermal oxidizer unit	YES
	NSPS Subpart WW, 60.492 (b)	Y		Overvarnish / Clear Basecoat: 0.46 kilogram of VOC per liter (3.84 lb/gal) of coating solids	NSPS Subpart WW, 60.493 (b)	P/M	Coating records, Initial performance test, Monthly operating parameters	YES
	Condition #391, part 1	Y		34.6885 tons/yr, facility wide limit	Condition #391, part 12	P/M	Monthly calculation of VOC emissions from Coating Lines 1 and 2	YES
VOC	Condition 26955, part 8	Y		Abatement Device efficiency $\geq 90\%$	Condition #26955, part 8	C	Temperature of thermal oxidizer unit	YES
	Condition #26955 part 13 and Condition #391, part 6	Y		Minimum thermal oxidizer Temperature of 1600 degrees F	Condition #26955, part 13 and Condition #391, part 6	C	Temperature of thermal oxidizer unit	YES
HAP	Condition #391, part 1	Y		<10 tons/yr., single HAP and <25 tons/yr., any combination of HAPs	Condition #391, part 12	P/M	Monthly calculation of HAP emissions from Coating Lines 1 and 2	YES
Periods of Inoperation for Parametric Monitors	BAAQMD 1-523.2	Y		15 consecutive days/incident and 30 calendar days/12-month period	BAAQMD 1-523.4	P/D	Operating Records for All Parametric Monitors	YES

**Table VII-E  
Applicable Limits and Compliance Monitoring Requirements  
S-5, S-11: Inside Spray Machines, Line 1 & Line 2**

Type of Limit	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance
VOC	BAAQMD 8-11-302 (alternative to 8-11-301.4)	Y		Abatement Device efficiency $\geq 90\%$	BAAQMD 8-11-504	C	Temperature of thermal oxidizer unit	YES
	NSPS Subpart WW, 60.492(c)	Y		Inside Spray: 0.89 kilogram of VOC per liter (7.43 lb./gal) of coating solids	NSPS Subpart WW, 60.493 (b)	P/M	Coating records, Initial performance test, Monthly operating parameters	YES
VOC	Condition #391, part 1	Y		34.6885 tons/yr, facility wide limit	Condition #391, part 12	P/M	Monthly calculation of VOC emissions from Coating Lines 1 and 2	YES
VOC	Condition #391, part 4	Y		Minimum Vacuum Pressure, 0.2 inches of water column (gauge)	Condition #391, part 4	P/D	Ventilation System negative pressure monitoring	YES
	Condition #391, part 5	Y		Abatement Device efficiency $\geq 95\%$	Condition #391, part 4	P/D	Ventilation System negative pressure monitoring	YES
	Condition #391, part 5	Y		Abatement Device efficiency $\geq 95\%$	Condition #391, part 7	C	Temperature of thermal oxidizer unit	YES
	Condition #391, part 6	Y		Minimum thermal oxidizer Temperature of 1,600 degrees F	Condition #391, part 7	C	Temperature of thermal oxidizer unit	YES



**Table VII-E  
 Applicable Limits and Compliance Monitoring Requirements  
 S-5, S-11: Inside Spray Machines, Line 1 & Line 2**

Type of Limit	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance
HAP	Condition #391, part 1	Y		<10 tons/yr., single HAP and <25 tons/yr., any combination of HAPs	Condition #391, part 12	P/M	Monthly calculation of HAP emissions from Coating Lines 1 and 2	YES
Opacity	BAAQMD Regulation 6-1-301	N		>Ringelmann No. 1 for no more than 3 minutes in any hour	Condition #16547, part 2, 3	P/Q	Baghouse Inspection	YES
	BAAQMD Regulation 6-1-310	N		0.15 gr/dscf	Condition #16547, part 2,3	P/Q	Baghouse Inspection	YES
Opacity	SIP Regulation 6-301	Y		>Ringelmann No. 1 for no more than 3 minutes in any hour	Condition #16547, part 2, 3	P/Q	Baghouse Inspection	YES
	SIP Regulation 6-310	Y		0.15 gr/dscf	Condition #16547, part 2, 3	P/Q	Baghouse Inspection	YES
Periods of Inoperation for Parametric Monitors	BAAQMD 1-523.2	Y		15 consecutive days/incident and 30 calendar days/12-month period	BAAQMD 1-523.4	P/D	Operating Records for All Parametric Monitors	YES

**Applicable Limits and Compliance Monitoring Requirements  
 S-33: Inside Spray Machines, Line 3**

Type of Limit	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance
VOC	BAAQMD 8-11-302 (alternative to 8-11-301.4)	Y		Abatement Device efficiency $\geq 90\%$	BAAQMD 8-11-504	C	Temperature of thermal oxidizer unit	YES
	NSPS Subpart WW, 60.492(c)	Y		Inside Spray: 0.89 kilogram of VOC per liter (7.43 lb./gal) of coating solids	NSPS Subpart WW, 60.493 (b)	P/M	Coating records, Initial performance test. Monthly operating parameters	YES
VOC	Condition #391, part 1	Y		34.6885 tons/yr, facility wide limit	Condition #391, part 12	P/M	Monthly calculation of VOC emissions from Coating Lines 1 and 2	YES
PM	Condition #26955, part 4 20	Y		Pressure drop across the baghouse no lower than 2" of water and no greater than 12" of water	Condition # 26955, part 4 20. a	P/W	Ventilation System negative pressure monitoring	YES
VOC	Condition #26955, part 9	Y		Overall Abatement Device efficiency $\geq 90\%$	Condition #26955, part 4 9	P/D	Temperature of thermal oxidizer unit	YES
	Condition #26955, part 13	Y		Minimum thermal oxidizer Temperature of 1,600 degrees F	Condition #26955, part 13	C	Temperature of thermal oxidizer unit	YES
HAP	Condition #391, part 1	Y		<10 tons/yr., single HAP and <25 tons/yr., any combination of HAPs	Condition #391, part 12	P/M	Monthly calculation of HAP emissions from Coating Lines 1 and 2	YES
Opacity	BAAQMD Regulation 6-1-301	N		>Ringelmann No. 1 for no more than 3 minutes in any hour	Condition #16547, part 2, 3	P/Q	Baghouse Inspection	YES

**Applicable Limits and Compliance Monitoring Requirements  
S-33: Inside Spray Machines, Line 3**

Type of Limit	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance
	BAAQMD Regulation 6-1-310	N		0.15 gr/dscf	Condition #16547, part 2,3	P/Q	Baghouse Inspection	YES
Opacity	SIP Regulation 6-301	Y		>Ringelmann No. 1 for no more than 3 minutes in any hour	Condition #16547, part 2, 3	P/Q	Baghouse Inspection	YES
	SIP Regulation 6-310	Y		0.15 gr/dscf	Condition #16547, part 2, 3	P/Q	Baghouse Inspection	YES
Periods of Inoperation for Parametric Monitors	BAAQMD 1-523.2	Y		15 consecutive days/incident and 30 calendar days/12-month period	BAAQMD 1-523.4	P/D	Operating Records for All Parametric Monitors	YES

**Table VII-F**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S-6, S-12: Bake Ovens, Line 1 & Line 2**

Type of Limit	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance
VOC	BAAQMD 8-11-302 (alternative to 8-11-301.4)	Y		Abatement Device efficiency $\geq 90\%$	BAAQMD 8-11-504	C	Temperature of thermal oxidizer unit	YES
	NSPS Subpart WW, 60.492 (c)	Y		Inside Spray Coat: 0.89 kilogram of VOC per liter (7.43 lb/gal) of coating solids	NSPS Subpart WW, 60.493 (b)	P/M	Coating records, Initial performance test, Monthly operating parameters	YES
	Condition #391, part 1	Y		34.6885 tons/yr, facility wide limit	Condition #391, part 12	P/M	Monthly calculation of VOC emissions from Coating Lines 1 and 2	YES
VOC	Condition #391, part 5	Y		Abatement Device efficiency $\geq 95\%$	Condition #391, part 7	C	Temperature of thermal oxidizer unit	YES
VOC	Condition #391, part 6	Y		Minimum thermal oxidizer Temperature of 1600 degrees F	Condition #391, part 7	C	Temperature of thermal oxidizer unit	YES
HAP	Condition #391, part 1	Y		<10 tons/yr., single HAP and <25 tons/yr., any combination of HAPs	Condition #391, part 12	P/M	Monthly calculation of HAP emissions from Coating Lines 1 and 2	YES
Periods of Inoperation for Parametric Monitors	BAAQMD 1-523.2	Y		15 consecutive days/incident and 30 calendar days/12-month period	BAAQMD 1-523.4	P/D	Operating Records for All Parametric Monitors	YES

**Applicable Limits and Compliance Monitoring Requirements  
S-34: Bake Ovens, Line 3**

Type of Limit	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance
VOC	BAAQMD 8-11-302 (alternative to 8-11-301.4)	Y		Abatement Device efficiency $\geq 90\%$	BAAQMD 8-11-504	C	Temperature of thermal oxidizer unit	YES
	NSPS Subpart WW, 60.492 (c)	Y		Inside Spray Coat: 0.89 kilogram of VOC per liter (7.43 lb/gal) of coating solids	NSPS Subpart WW, 60.493 (b)	P/M	Coating records, Initial performance test, Monthly operating parameters	YES
	Condition #391, part 1	Y		34.6885 tons/yr, facility wide limit	Condition #391, part 12	P/M	Monthly calculation of VOC emissions from Coating Lines 1 and 2	YES
VOC	Condition #26955, part 9	Y		Abatement Device efficiency $\geq 90\%$	Condition #26955, part 9	C	Temperature of thermal oxidizer unit	YES
VOC	Condition #26955, part 13	Y		Minimum thermal oxidizer Temperature of 1600 degrees F	Condition #26955, part 14	C	Temperature of thermal oxidizer unit	YES
HAP	Condition #391, part 1	Y		<10 tons/yr., single HAP and <25 tons/yr., any combination of HAPs	Condition #391, part 12	P/M	Monthly calculation of HAP emissions from Coating Lines 1 and 2	YES
Periods of Inoperation for Parametric Monitors	BAAQMD 1-523.2	Y		15 consecutive days/incident and 30 calendar days/12-month period	BAAQMD 1-523.4	P/D	Operating Records for All Parametric Monitors	YES

**Table VII-G  
Applicable Limits and Compliance Monitoring Requirements  
S-16: Scrap Collection System**

Type of Limit	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance
Opacity	BAAQMD Regulation 6-1-301	N		≥Ringelmann No. 1 for no more than 3 minutes in any hour		N		YES
	BAAQMD Regulation 6-1-310	N		0.15 gr/dscf		N		YES
Opacity	SIP Regulation 6-301	Y		≥Ringelmann No. 1 for no more than 3 minutes in any hour		N		YES
	SIP Regulation 6-310	Y		0.15 gr/dscf		N		YES
FP	BAAQMD Regulation 6-1-311	N		2.7 lb./hr. (throughput = 1,000 lb./hr.)		N		YES
FP	SIP Regulation 6-311	Y		2.7 lb./hr. (throughput = 1,000 lb./hr.)		N		YES

**Table VII-H  
Applicable Limits and Compliance Monitoring Requirements  
S-17: Lime Silo**

Type of Limit	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance
Opacity	BAAQMD Regulation 6-1-301	N		≥Ringelmann No. 1 for no more than 3 minutes in any hour	Condition #16548, part 2, 3	P/A	Visible Emissions Checks, Records for S-17	YES
	BAAQMD Regulation 6-1-310	N		0.15 gr/dscf		N		YES
Opacity	SIP Regulation 6-301	Y		≥Ringelmann No. 1 for no more than 3 minutes in any hour	Condition #16548, part 2, 3	P/A	Visible Emissions Checks, Records for S-17	YES
	SIP Regulation 6-310	Y		0.15 gr/dscf		N		YES
FP	BAAQMD Regulation 6-1-311	N		16.6 lb./hr. (throughput = 16,000 lb./hr.)		N		YES
FP	SIP Regulation 6-311	Y		16.6 lb./hr. (throughput = 16,000 lb./hr.)		N		YES

**Table VII – I**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S-21: Emergency Diesel Fire Pump Engine**

**NOTE:** Source 21, Fire pump not in operation during this reporting period. Down for failed diesel engine replacement. Just recently received AP permit from BAAQMD.

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance
Fuel Sulfur Content	BAAQMD 9-1-304	Y		Sulfur content of liquid fuel ≤ 0.5% by weight	None	N	N/A	N/A
Fuel Sulfur Content	40 CFR Part 60 Subpart IIII 60.4207(a); 40 CFR Part 80 Subpart I 80.510(a) (1)	Y		Sulfur content of diesel fuel ≤ 500 ppm, maximum	None	N	N/A	N/A
Fuel Sulfur Content	40 CFR Part 60 Subpart IIII 60.4207(a); 40 CFR Part 80 Subpart I 80.510(b) (1)	Y		Sulfur content of diesel fuel ≤ 15 ppm, maximum	None	N	N/A	N/A
Hours of Operation	BAAQMD 9-8-330.3	N		<50 hours per calendar year for reliability testing	BAAQMD 9-8-530	C	Totalizing meter for hours of operation	N/A
					BAAQMD 9-8-520.1 & 9-1-530	M	Records	N/A
Hours of Operation	CCR, Title 17, Section 93115.6(b)(3)(A)(2)(b)	N		<= 50 hours/year for reliability-related activities	CCR, Title 17, Section 93115.10(e) (1)	C	Totalizing meter for hours of operation	N/A
					CCR, Title 17, Section 93115.10(g)	M	Records	N/A
Hours of Operation	40 CFR Part 60 Subpart IIII 60.4211(e)	Y		<= 100 hours/year for reliability-related activities	40 CFR Part 60 Subpart IIII 60.4209(a)	C	Totalizing meter for hours of operation	N/A
Hours of Operation	Condition 24495, Part 1	Y		<= 50 hours/year for reliability-related activities	Condition 24495, Part 3	C	Totalizing meter for hours of operation	N/A
					Condition 24495, Part 4	M	Records	N/A



**Table VII – I**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S-21: Emergency Diesel Fire Pump Engine**

**NOTE:** Source 21, Fire pump not in operation during this reporting period. Down for failed diesel engine replacement. Just recently received AP permit from BAAQMD.

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance
NMHC-NOx					None		N/A	N/A
CO					None		N/A	N/A
PM					None		N/A	N/A
Opacity	BAAQMD 6-1-303.1	N		Ringelmann No. 2 for no more than 3 minutes in any hour or equivalent opacity	None	N	N/A	N/A
Opacity	SIP Regulation 6-303.1	Y		Ringelmann No. 2 for no more than 3 minutes in any hour or equivalent opacity	None	N	N/A	N/A
FP	BAAQMD 6-1-310			0.15 gr/dscf Particulate Weight Limitation		N	N/A	N/A
FP	SIP Regulation 6-310	Y		0.15 gr/dscf Particulate Weight Limitation		N	N/A	N/A
SO <sub>2</sub>	BAAQMD 9-1-301	N		GLC1 of 0.5 ppm for 3 min or 0.25 ppm for 60 min or 0.05 ppm for 24 hours	None	N	N/A	N/A
SO <sub>2</sub>	BAAQMD 9-1-304	Y		0.5% sulfur in fuel by weight	None	N	N/A	N/A
SO <sub>2</sub>		N		Sulfur content of fuel less than 0.05% by weight	None	N	N/A	N/A

Director of Compliance and Enforcement  
 Bay Area Air Quality Management District  
 375 Beale Street, Suite 600  
 San Francisco, CA 94105

Ardagh Metal Packaging N.A.  
 2433 Crocker Circle  
 Fairfield, CA 94533

Attention: Title V Reports

January 17, 2022

T: (707) 437-6645

[ardaghgroup.com](http://ardaghgroup.com)

SUBJECT: Ardagh Metal Packaging N.A. – Plant # A1665  
 Semi-Annual, Emission Compliance Demonstration  
 7/01/2022 through 12/31/2022

TV Tracking #: 675

1.  RECEIVED IN ENFORCEMENT: 01/31/2023

Dear Sir or Madam,

Attached please find a copy of the Semi-Annual Emission Compliance Demonstration report for our two-piece can manufacture facility located in Fairfield, CA. We are required to demonstrate facility-wide compliance of less than 34.96 tons/year.

Please note that we are using all coating materials that conform to both the State and Federal regulation requirements. Our facility-wide monthly VOC emissions are as follows:

Month	Emissions (TPY)
July-	1.517
August-	1.709
September-	1.401
October-	1.271
November-	1.370
December-	1.056
<b>6 Month Total</b>	<b>8.324</b>

Attached are the calculation sheets for the six-month period for your review.

I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in these documents are true, accurate and complete.

If you have any questions or require additional information, please contact me or my plant representative:

[David.Trujillo@ArdaghGroup.com](mailto:David.Trujillo@ArdaghGroup.com) (707) 437-7401

[Eric.Berkheimer@ARDaghGroup.com](mailto:Eric.Berkheimer@ARDaghGroup.com) (707) 249-4909

Regards,



David Trujillo  
 Plant Manager



SURFACE AREA FOR 12 OZ. REGULAR CANS: 18 TO 12 OZ. RATIO:		36.48	NO. IN.	TOTAL FACILITY COATING LINES:	
SURFACE AREA FOR 16 OZ. REGULAR CANS: 18 TO 12 OZ. RATIO:		51.96	NO. IN.		
		1.28			
LINE 1 & 2 PRODUCTION (12 OZ.)		123,174,988	CANS	Inkjet Spray:	
LINE 3 PRODUCTION (16 OZ.)		50,266,437	CANS	PPG 2122SD SPAN / IS	
EQUIVALENT 12 OZ. PRODUCTION ON LINE 3:		76,294,944	CANS	PPG 2122SD SPAN / IS	
TOTAL EQUIVALENT 12 OZ. PRODUCTION:		199,471,932	CANS	VALSPAN 2003AP / IS	
% PRODUCTION ON LINE 1 & 2:		61.86%	%	VALSPAN VITROLAM SPAN - GEN 2 / IS	
% PRODUCTION ON LINE 3:		38.14%	%		

REPORTING MONTH: 01/2022

VOC EMISSIONS												
LINE 1 & 2 12 OZ. REGULAR CANS												
MATERIAL	GALLONS OF COATING MATERIAL	POUNDS OF SOLVENT	WEIGHT % SOLID		WEIGHT % SOLVENT	WEIGHT % WATER	GALLONS PRODUCED	GALLONS COATING APPLIED	GALLONS SOLIDS APPLIED	EMISSION FACTOR	VOC EMISSIONS (lbm)	
			g1	g2								g
PRODUCTION LINE 1 & 2												
Inkjet Spray:												
PPG 2122SD SPAN / IS	3.3	8.50	19.8	19.8	11.8	86.2	6.1	0	0.00	3.77%	0.00	
PPG 2122SD SPAN / IS	3.3	8.40	21.1	17.8	14.4	86.5	6.0	14,178	209.97	3.77%	0.22	
VALSPAN 2003AP / IS	3.3	8.40	21.1	17.8	14.4	86.5	6.0	963	197.80	3.77%	0.02	
VALSPAN VITROLAM SPAN - GEN 2 / IS	3.3	8.40	21.1	17.8	14.4	86.5	6.0	14,528	243.97	3.77%	0.22	
Varnish:												
PPG 37998B / V	2.1	8.30	47.8	41.4	13.2	26.3	2.9	279	93.22	3.77%	0.01	
PPG 380282 / V	2.1	8.00	36.5	35.1	8.2	53.1	2.9	3,785	333.54	3.77%	0.12	
PPG 803082 - TACTILE / OV	2.1	8.00	41.8	36.9	11.8	49.7	2.9	113.90	3.77%	0.01		
PPG80315A - MATTE / OV	2.1	8.00	36.5	35.1	8.2	53.1	2.9	0	0.00	3.77%	0.00	
PPG803181 CLEAR SATIN / OV	2.1	8.18	36.9	32.8	10.4	49.7	2.9	363	96.61	3.77%	0.01	
PPG803111 MATTE / OV	2.1	8.18	36.9	32.8	10.4	49.7	2.9	0	0.00	3.77%	0.00	
MELAC S.P.A. / OV	1.00	8.84	42.2	37.8	12.4	46.4	2.4	0	0.00	3.77%	0.00	
Basecoat:												
PPG 379918	1.8	11.90	55.0	36.3	8.8	36.4	2.4	604	248.18	3.77%	0.01	
PPG 379918	1.8	11.90	55.0	36.3	8.8	36.4	2.4	18,884	3.77%	0.04		
PRINTER CLEANER (Acetone - VOC Exempt)												
PARTS CLEANER (Safety Chem 100)												
TOTAL VOC EMISSIONS												

GALLONS USED	B VOC/Gal	GALLONS WASTE MATERIAL	VOC (lb)	VOC (lb)
18	0.99	0	0	0

PRINTER CLEANER: ACETONE - VOC EXEMPT

GALLONS USED	B VOC/Gal	GALLONS WASTE MATERIAL	VOC RECLAIMED (lb)	VOC EMISSIONS (lb)
0	0.0	0	0	0

VOC EMISSIONS												
LINE 1 & 2 12 OZ. REGULAR CANS												
MATERIAL	GALLONS OF COATING (EMF/METH)	POUNDS OF SOLVENT (EMF/METH)	COATING DENSITY (LBS/GAL)	EMISSION FACTOR	WEIGHT PERCENT SOLID	DOSE EMISSION POUNDS/MONTH (111-96.4)	WEIGHT PERCENT SOLVENT	DOSE EMISSION POUNDS/MONTH (111-96.4)	WEIGHT PERCENT WATER	DOSE EMISSION POUNDS/MONTH (111-96.4)	WEIGHT PERCENT CELLULOSE EMISSIONS (111-96.4)	ETHYL BENZENE EMISSIONS POUNDS/MONTH (116-61.4)
INKJET SPRAY												
PPG 2122SD SPAN / IS	0	0.00	3.77%	0.00	0	0.00	0	0.00	0	0.00	0	0.00
PPG 2122SD SPAN / IS	14,178	8.40	3.77%	0.00	0	0.00	0	0.00	0	0.00	0	0.00
VALSPAN 2003AP / IS	963	8.40	3.77%	0.00	0	0.00	0	0.00	0	0.00	0	0.00
VALSPAN VITROLAM SPAN - GEN 2 / IS	14,528	8.40	3.77%	0.00	0	0.00	0	0.00	0	0.00	0	0.00
VARNISH												
PPG 37998B / V	279	8.30	3.77%	0.00	0	0.00	0	0.00	0	0.00	0	0.00
PPG 380282 / V	3,785	8.00	3.77%	0.00	0	0.00	0	0.00	0	0.00	0	0.00
PPG 803082 - TACTILE / OV	113.90	8.00	3.77%	0.00	0	0.00	0	0.00	0	0.00	0	0.00
PPG80315A - MATTE / OV	0	8.00	3.77%	0.00	0	0.00	0	0.00	0	0.00	0	0.00
PPG803181 CLEAR SATIN / OV	363	8.18	3.77%	0.00	0	0.00	0	0.00	0	0.00	0	0.00
PPG803111 MATTE / OV	0	8.18	3.77%	0.00	0	0.00	0	0.00	0	0.00	0	0.00
MELAC S.P.A. / OV	0	8.84	3.77%	0.00	0	0.00	0	0.00	0	0.00	0	0.00
BOTTOM VARNISH												
PPG 379918	604	11.90	3.77%	0.00	0	0.00	0	0.00	0	0.00	0	0.00
PPG 379918	18,884	11.90	3.77%	0.00	0	0.00	0	0.00	0	0.00	0	0.00
BASE COAT												
PPG 379918	1	11.90	3.77%	0.00	0	0.00	0	0.00	0	0.00	0	0.00
PPG 379918	1	11.90	3.77%	0.00	0	0.00	0	0.00	0	0.00	0	0.00
FACILITY TOTAL EMISSIONS POUNDS												
						8.77	0.00	0.00	0.00	0.00	0.00	0.00
TOTAL FACILITY HAP						8.868	0.000	0.000	0.000	0.000	0.000	0.000
WHOLE FACILITY HAP						LESS THAN 10 TONS						
TOTAL FACILITY HAP						LESS THAN 10 TONS						

BASED ON THE COMPLIANCE SOURCE TESTING PERFORMED ON OCTOBER 8, 2019 BY MONITOR AIR QUALITY SERVICES - RETO A1

CAPTURE EFFICIENCY:	97.3%
DESTRUCTION EFFICIENCY:	96.3%
TOTAL CONTROL EFFICIENCY:	3.77%
EMISSION FACTOR:	

VOC EMISSIONS												
LINE 3 16 OZ. REGULAR CANS												
MATERIAL	GALLONS OF COATING MATERIAL	POUNDS OF SOLVENT	WEIGHT % SOLID		WEIGHT % SOLVENT	WEIGHT % WATER	GALLONS PRODUCED	GALLONS COATING APPLIED	GALLONS SOLIDS APPLIED	EMISSION FACTOR	VOC EMISSIONS (lbm)	
			g1	g2								g
PRODUCTION LINE 3												
EQUIVALENT 12 OZ. PRODUCTION ON LINE 3:												
PPG 2122SD SPAN / IS	0	0.00	0.00%	0.00	0	0.00	0	0.00	0	0.00%	0.00	
PPG 2122SD SPAN / IS	0	0.00	0.00%	0.00	0	0.00	0	0.00	0	0.00%	0.00	
VALSPAN 2003AP / IS	181	8.40	0.00%	0.00	0	0.00	0	0.00	0	0.00%	0.00	
VALSPAN VITROLAM SPAN - GEN 2 / IS	181	8.40	0.00%	0.00	0	0.00	0	0.00	0	0.00%	0.00	
Varnish:												
PPG 37998B / V	5.71	8.30	0.00%	0.00	0	0.00	0	0.00	0	0.00%	0.00	
PPG 380282 / V	198	8.00	0.00%	0.00	0	0.00	0	0.00	0	0.00%	0.00	
PPG 803082 - TACTILE / OV	0	8.00	0.00%	0.00	0	0.00	0	0.00	0	0.00%	0.00	
PPG80315A - MATTE / OV	0	8.00	0.00%	0.00	0	0.00	0	0.00	0	0.00%	0.00	
PPG803181 CLEAR SATIN / OV	187	8.18	0.00%	0.00	0	0.00	0	0.00	0	0.00%	0.00	
PPG803111 MATTE / OV	0	8.18	0.00%	0.00	0	0.00	0	0.00	0	0.00%	0.00	
MELAC S.P.A. / OV	0	8.84	0.00%	0.00	0	0.00	0	0.00	0	0.00%	0.00	
Basecoat:												
PPG 379918	1.8	11.90	0.00%	0.00	0	0.00	2.4	393	153.84	0.00%	0.01	
PPG 379918	1.8	11.90	0.00%	0.00	0	0.00	2.4	6,995	0.00%	0.04		
PRINTER CLEANER (Acetone - VOC Exempt)												
PARTS CLEANER (Safety Chem 100)												
TOTAL VOC EMISSIONS												

GALLONS USED	B VOC/Gal	GALLONS WASTE MATERIAL	VOC (lb)	VOC (lb)
181	0.00	0	0	0

PRINTER CLEANER: ACETONE - VOC EXEMPT

GALLONS USED	B VOC/Gal	GALLONS WASTE MATERIAL	VOC RECLAIMED (lb)	VOC EMISSIONS (lb)
0	0.0	0	0	0

VOC EMISSIONS												
LINE 3 16 OZ. REGULAR CANS												
MATERIAL	GALLONS OF COATING (EMF/METH)	POUNDS OF SOLVENT (EMF/METH)	COATING DENSITY (LBS/GAL)	EMISSION FACTOR	WEIGHT PERCENT SOLID	DOSE EMISSION POUNDS/MONTH (111-96.4)	WEIGHT PERCENT SOLVENT	DOSE EMISSION POUNDS/MONTH (111-96.4)	WEIGHT PERCENT WATER	DOSE EMISSION POUNDS/MONTH (111-96.4)	WEIGHT PERCENT CELLULOSE EMISSIONS (111-96.4)	ETHYL BENZENE EMISSIONS POUNDS/MONTH (116-61.4)
INKJET SPRAY												
PPG 2122SD SPAN / IS	0	0.00	0.00%	0.00	0	0.00	0	0.00	0	0.00	0	0.00
PPG 2122SD SPAN / IS	0	0.00	0.00%	0.00	0	0.00	0	0.00	0	0.00	0	0.00
VALSPAN 2003AP / IS	181	8.40	0.00%	0.00	0	0.00	0	0.00	0	0.00	0	0.00
VALSPAN VITROLAM SPAN - GEN 2 / IS	181	8.40	0.00%	0.00	0	0.00	0	0.00	0	0.00	0	0.00
VARNISH												
PPG 37998B / V	5.71	8.30	0.00%	0.00	0	0.00	0	0.00	0	0.00	0	0.00
PPG 380282 / V	198	8.00	0.00%	0.00	0	0.00	0	0.00	0	0.00	0	0.00
PPG 803082 - TACTILE / OV	0	8.00	0.00%	0.00	0	0.00	0	0.00	0	0.00	0	0.00
PPG80315A - MATTE / OV	0	8.00	0.00%	0.00	0	0.00	0	0.00	0	0.00	0	0.00
PPG803181 CLEAR SATIN / OV	187	8.18	0.00%	0.00	0	0.00	0	0.00	0	0.00	0	0.00
PPG803111 MATTE / OV	0	8.18	0.00%	0.00	0	0.00	0	0.00	0	0.00	0	0.00
MELAC S.P.A. / OV	0	8.84	0.00%	0.00	0	0.00	0	0.00	0	0.00	0	0.00
BOTTOM VARNISH												
PPG 379918	1	11.90	0.00%	0.00	0	0.00	0	0.00	0	0.00	0	0.00
PPG 379918	1	11.90	0.00%	0.00	0	0.00	0	0.00	0	0.00	0	0.00
FACILITY TOTAL EMISSIONS POUNDS												
						8.77	0.00	0.00	0.00	0.00	0.00	0.00
TOTAL FACILITY HAP						8.868	0.000	0.000	0.000	0.000	0.000	0.000
WHOLE FACILITY HAP						LESS THAN 10 TONS						
TOTAL FACILITY HAP						LESS THAN 10 TONS						

BASED ON THE COMPLIANCE SOURCE TESTING PERFORMED ON OCTOBER 10, 2019 BY MONITOR AIR QUALITY SERVICES - RETO A11

CAPTURE EFFICIENCY:	94.7%
DESTRUCTION EFFICIENCY:	96.7%
TOTAL CONTROL EFFICIENCY:	83.0%
EMISSION FACTOR:	0.000

SURFACE AREA FOR 12 OZ. REGULAR CANS: FAIRFACE AREA FOR 16 OZ. REGULAR CANS: 16 TO 12 OZ. RATIO:	39.49 51.66 1.309	RD IN RD IN	TOTAL FACILITY COATING UNITS:																																																																				
LINE 1 & 2 PRODUCTION (12 OZ.): LINE 3 PRODUCTION (16 OZ.): EQUIVALENT 12 OZ. PRODUCTION ON LINE 3: TOTAL EQUIVALENT 12 OZ. PRODUCTION: % PRODUCTION ON LINE 1 & 2: % PRODUCTION ON LINE 3:	168,266,091 CANS 74,374,949 CANS 74,674,173 CANS 176,345,294 CANS 46.37% 53.63%		<table border="1"> <tr> <th colspan="2">GALLONS</th> <th colspan="2">POUNDS</th> </tr> <tr> <td>Basecoat:</td> <td></td> <td>21,500</td> <td></td> </tr> <tr> <td>PPG 212820 SPAN / S</td> <td></td> <td>290</td> <td></td> </tr> <tr> <td>PPG 212820 SPAN / S</td> <td></td> <td>14,822</td> <td></td> </tr> <tr> <td>VULCAN 2020AP / S</td> <td></td> <td></td> <td></td> </tr> <tr> <td>VULCAN 2020AP / S - GEN 2 / S</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Primer:</td> <td></td> <td>296</td> <td></td> </tr> <tr> <td>PPG 310000 / V</td> <td></td> <td>19,440</td> <td></td> </tr> <tr> <td>PPG 310000 / V</td> <td></td> <td>2,429</td> <td></td> </tr> <tr> <td>PPG 803062 - FACTILE / OV</td> <td></td> <td></td> <td></td> </tr> <tr> <td>PPG020155 - MATTE / OV</td> <td></td> <td>750</td> <td></td> </tr> <tr> <td>PPG020151 CLEAR BATH / OV</td> <td></td> <td></td> <td></td> </tr> <tr> <td>PPG020151 MATTE / OV</td> <td></td> <td>0</td> <td></td> </tr> <tr> <td>METLAC S.P.A. / OV</td> <td></td> <td>0</td> <td></td> </tr> <tr> <td>Basecoat:</td> <td></td> <td>356</td> <td></td> </tr> <tr> <td>PPG 310018</td> <td></td> <td></td> <td></td> </tr> <tr> <td>(Bk.1)</td> <td></td> <td>16,007</td> <td></td> </tr> </table>	GALLONS		POUNDS		Basecoat:		21,500		PPG 212820 SPAN / S		290		PPG 212820 SPAN / S		14,822		VULCAN 2020AP / S				VULCAN 2020AP / S - GEN 2 / S				Primer:		296		PPG 310000 / V		19,440		PPG 310000 / V		2,429		PPG 803062 - FACTILE / OV				PPG020155 - MATTE / OV		750		PPG020151 CLEAR BATH / OV				PPG020151 MATTE / OV		0		METLAC S.P.A. / OV		0		Basecoat:		356		PPG 310018				(Bk.1)		16,007	
GALLONS		POUNDS																																																																					
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(Bk.1)		16,007																																																																					

MATERIAL	B VOC/gal COATING WASTE WATER	COATING DENSITY (lb/gal)	WEIGHT % SOLID	VOLUME % SOLID	WEIGHT % SOLVENT	WEIGHT % WATER	B VOC/gal SOLD	CANS PRODUCED	GALLON COATING APPLIED	GALLON SOLIDS APPLIED	EMISSION FACTOR	VOC EMISSIONS (lbs)
LINES 1 & 2 12 OZ. REGULAR CANS												
PRODUCTION - LINES 1 & 2												
Normal Production:												
Basecoat:							21.5	168,266,091				
PPG 212820 SPAN / S	3.3	8.80	19.6	19.6	11.8	68.2	6.1		0	0.00	3.77%	0.00
PPG 212820 SPAN / S	3.3	8.80	21.1	17.1	14.9	64.4	6.9		18,879	228.23	3.77%	0.36
VULCAN 2020AP / S	3.3	8.43	21.1	17.6	14.4	65.5	6.6		585	20.48	3.77%	0.06
VULCAN 2020AP / S - GEN 2 / S	3.3	8.43	21.1	18.0	13.9	65.8	6.6		8,865	119.12	3.77%	0.16
Primer:							296					
PPG 310000 / V	2.1	8.10	47.8	41.4	13.2	26.3	2.9		171	70.96	3.77%	0.06
PPG 310000 / V	2.1	8.00	38.5	33.1	8.2	53.8	2.2		4,398	207.04	3.77%	0.06
PPG 803062 - FACTILE / OV	2.1	8.02	41.5	36.9	11.8	49.7	2.9		1,467	526.04	3.77%	0.03
PPG020155 - MATTE / OV	2.1	8.00	39.5	36.2	8.9	52.4	2.9		0	0.00	3.77%	0.00
PPG020151 CLEAR BATH / OV	2.1	8.15	38.8	37.0	10.4	49.7	2.9		494	16.34	3.77%	0.01
PPG020151 MATTE / OV	2.1	8.15	39.5	37.2	10.4	49.2	2.9		0	0.00	3.77%	0.00
METLAC S.P.A. / OV	1.00	8.84	42.2	37.0	12.4	41.4	2.4		0	0.00	3.77%	0.00
Basecoat:							356					
PPG 310018	1.8	11.00	55.0	39.3	8.6	36.4	2.4		211	83.04	3.77%	0.02
(Bk.1)							20		18,255	3.77%	0.04	0.04
PRINTER CLEANER:									36		0.00	0.00
(Acetone - VOC Exempt)												
PARTS CLEANER:									0		0.00	0.00
(Safety Sheen 350)												
TOTAL VOC EMISSIONS												

GALLONS USED	B VOC/gal	GALLONS WASTE MATERIAL	VOC (lb)	VOC EMISSIONS (lb)
a	b	c	d	e
18	6.6	0	0	0

\*\* PARTS CLEANER:

GALLONS USED	B VOC/gal	GALLONS WASTE MATERIAL	VOC RECLAIMED (lb)	VOC EMISSIONS (lb)
a	b	c	d	e
0	0	0	0	0

MATERIAL	GALLONS OF COATING (LBS/100GAL)	POUNDS OF INK & SOLVENT (LBS/100GAL)	COATING DENSITY (lb/gal)	EMISSION FACTOR	WEIGHT PERCENT SOLVENT	DOSE EMISSION POUNDS/MONTH	WEIGHT PERCENT DOSE	DOSE EMISSION POUNDS/MONTH	WEIGHT PERCENT DOSE	DOSE EMISSION POUNDS/MONTH	WEIGHT PERCENT DOSE	DOSE EMISSION POUNDS/MONTH	WEIGHT PERCENT DOSE	DOSE EMISSION POUNDS/MONTH	WEIGHT PERCENT DOSE	ETHYL BENZENE EMISSIONS POUNDS/MONTH	WEIGHT PERCENT ETHYL BENZENE	XYLENE EMISSIONS POUNDS/MONTH	WEIGHT PERCENT XYLENE	FREE FORMALDEHYDE (PbCHO) EMISSION POUNDS/MONTH	WEIGHT PERCENT FORMALDEHYDE	METHANOL POUNDS/MONTH	WEIGHT PERCENT METHANOL	PHENOL POUNDS/MONTH	WEIGHT PERCENT PHENOL		
LINES 1 & 2 12 OZ. REGULAR CANS																											
1 US TONS = 2000 LBS																											
97.16% KEG COGMENTS VOC EMISSIONS BY KEG COGMENTS																											
126.1 TONS																											
594.89																											
TOTAL FACILITY HAPS																											
8.81 TONS																											
SINGLE FACILITY HAP																											
LESS THAN 10 TONS																											
TOTAL FACILITY HAPS																											
LESS THAN 10 TONS																											

BASED ON THE COMPLIANCE SOURCE TESTING PERFORMED ON OCTOBER 8 & 11, 2019 BY MONITROSE AIR QUALITY SERVICES - RTO 9A

CAPTURE EFFICIENCY:	97.5%
DESTRUCTION EFFICIENCY:	99.9%
TOTAL CONTROL EFFICIENCY:	96.7%
EMISSION FACTOR:	3.77%

MATERIAL	B VOC/gal COATING WASTE WATER	COATING DENSITY (lb/gal)	WEIGHT % SOLID	VOLUME % SOLID	WEIGHT % SOLVENT	WEIGHT % WATER	B VOC/gal SOLD	CANS PRODUCED	GALLON COATING APPLIED	GALLON SOLIDS APPLIED	EMISSION FACTOR	VOC EMISSIONS (lbs)
LINE 3 16 OZ. REGULAR CANS												
PRODUCTION - LINE 3												
EQUIVALENT 12 OZ. PRODUCTION ON LINE 3:												
74,674,173												
Normal Production:												
Basecoat:							74.67					
PPG 212820 SPAN / S	3.3	8.80	19.6	19.6	11.8	68.2	6.1		0	0.00	6.57%	0.00
PPG 212820 SPAN / S	3.3	8.80	21.1	17.1	14.9	64.4	6.9		185	180.14	6.57%	0.34
VULCAN 2020AP / S	3.3	8.43	21.1	17.6	14.4	65.5	6.6		185	21.80	6.57%	0.06
VULCAN 2020AP / S - GEN 2 / S	3.3	8.43	21.1	18.0	13.9	65.8	6.6		5,967	104.19	6.57%	0.21
Primer:							296					
PPG 310000 / V	2.1	8.10	47.8	41.4	13.2	26.3	2.9		113	46.80	6.57%	0.02
PPG 310000 / V	2.1	8.00	38.5	33.1	8.2	53.8	2.2		4,461	170.89	6.57%	0.10
PPG 803062 - FACTILE / OV	2.1	8.02	41.5	36.9	11.8	49.7	2.9		893	363.22	6.57%	0.03
PPG020155 - MATTE / OV	2.1	8.00	39.5	36.2	8.9	52.4	2.9		0	0.00	6.57%	0.00
PPG020151 CLEAR BATH / OV	2.1	8.15	38.8	37.0	10.4	49.7	2.9		395	98.36	6.57%	0.01
PPG020151 MATTE / OV	2.1	8.15	39.5	37.2	10.4	49.2	2.9		0	0.00	6.57%	0.00
METLAC S.P.A. / OV	1.00	8.84	42.2	37.0	12.4	41.4	2.4		0	0.00	6.57%	0.00
Basecoat:							74.67					
PPG 310018	1.8	11.00	55.0	39.3	8.6	36.4	2.4		139	51.51	6.57%	0.02
(Bk.1)							20		6,732	6.57%	0.04	0.04
PRINTER CLEANER:									20		0.00	0.00
(Acetone - VOC Exempt)												
PARTS CLEANER:									0		0.00	0.00
(Safety Sheen 350)												
TOTAL VOC EMISSIONS												

GALLONS USED	B VOC/gal	GALLONS WASTE MATERIAL	VOC (lb)	VOC EMISSIONS (lb)
a	b	c	d	e
18	6.6	0	0	0

\*\* PARTS CLEANER:

GALLONS USED	B VOC/gal	GALLONS WASTE MATERIAL	VOC RECLAIMED (lb)	VOC EMISSIONS (lb)
a	b	c	d	e
0	0	0	0	0

MATERIAL	GALLONS OF COATING (LBS/100GAL)	POUNDS OF INK & SOLVENT (LBS/100GAL)	COATING DENSITY (lb/gal)	EMISSION FACTOR	WEIGHT PERCENT SOLVENT	DOSE EMISSION POUNDS/MONTH	WEIGHT PERCENT DOSE	DOSE EMISSION POUNDS/MONTH	WEIGHT PERCENT DOSE	DOSE EMISSION POUNDS/MONTH	WEIGHT PERCENT DOSE	DOSE EMISSION POUNDS/MONTH	WEIGHT PERCENT DOSE	DOSE EMISSION POUNDS/MONTH	WEIGHT PERCENT DOSE	ETHYL BENZENE EMISSIONS POUNDS/MONTH	WEIGHT PERCENT ETHYL BENZENE	XYLENE EMISSIONS POUNDS/MONTH	WEIGHT PERCENT XYLENE	FREE FORMALDEHYDE (PbCHO) EMISSION POUNDS/MONTH	WEIGHT PERCENT FORMALDEHYDE	METHANOL POUNDS/MONTH	WEIGHT PERCENT METHANOL	PHENOL POUNDS/MONTH	WEIGHT PERCENT PHENOL		
LINE 3 16 OZ. REGULAR CANS																											
1 US TONS = 2000 LBS																											
97.16% KEG COGMENTS VOC EMISSIONS BY KEG COGMENTS																											
126.1 TONS																											
594.89																											
TOTAL FACILITY HAPS																											
8.81 TONS																											
SINGLE FACILITY HAP																											
LESS THAN 10 TONS																											
TOTAL FACILITY HAPS																											
LESS THAN 10 TONS																											

BASED ON THE COMPLIANCE SOURCE TESTING PERFORMED ON OCTOBER 10, 2019 BY MONITROSE AIR QUALITY SERVICES - RTO 9A

CAPTURE EFFICIENCY:	94.7%
DESTRUCTION EFFICIENCY:	99.7%
TOTAL CONTROL EFFICIENCY:	93.9%
EMISSION FACTOR:	6.57%

SURFACE AREA FOR 12 OZ. REGULAR CANS: SURFACE AREA FOR 16 OZ. REGULAR CANS: 16 TO 12 OZ. RATIO:	36.49 41.06 1.126	KG. IN. KG. IN. KG. IN.	TOTAL FACILITY COATING LIQUIDS:	GALLONS	POUNDS
LINE 1 & 2 PRODUCTION (12 OZ.)	102,124.718	CANS	Inside Spray:	122,124.718	
LINE 3 PRODUCTION (16 OZ.)	17,025.081	CANS	PPG 2012B20 SPAN / IS	0	0.00
EQUIVALENT 12 OZ. PRODUCTION ON LINE 3:	17,796.269	CANS	PPG 2012B20 SPAN / IS	11,889	219.03
TOTAL EQUIVALENT 12 OZ. PRODUCTION:	119,920.987	CANS	VULCAN 2002M3 / IS	478	94.36
% PRODUCTION ON LINE 1 & 2:	89.73%	%	VULCAN V2002M3 SPAN - GEN 2 / IS	2,600	124.14
% PRODUCTION ON LINE 3:	10.27%	%	OVER VARNISH:	289	52.77
			PPG 3708001 / EV	11,366	0.00
			PPG 3708002 / EV	1,067	0.00
			PPG 8030821 / TACTILE / OV	2,099	229.30
			PPG 8030821 / TACTILE / OV	3,584	354.86
			PPG802181 CLEAR WATER / OV	282	86.20
			PPG802181 / MATTE / OV	0	0.00
			METALAC S.P.A. / OV	0	0.00
			BASECOAT:	530	0.00
			PPG 370018 /		
			INK (In.)	20	0.00
			PRINTER CLEANER* (Acetone - VOC Exempt)	34	0.00
			PARTS CLEANER* (Safin - VOC Exempt)	0	0.00
			TOTAL VOC EMISSIONS	126.76	502.89

MATERIAL	B VOC/gal COATING MINUS WATER	COATING DENSITY (lb/gal)	WEIGHT % SOLID	VOLUME % SOLID	WEIGHT % SOLVENT	WEIGHT % WATER	B VOC/gal SOLID	CANS PRODUCED	GALLON COATING APPLIED	GALLON SOLIDS APPLIED	EMISSION FACTOR	VOC EMISSIONS (Tons)
	A	B	S1	S2	C	D	E	F	G	H=92189kg	I	J=16x2999kg
<b>PRODUCTION - LINE 1 &amp; 2</b>												
Inside Spray:												
PPG 2012B20 SPAN / IS	3.3	8.50	19.5	16.5	11.9	88.2	0.1	0	0.00	0.00	3.778	0.00
PPG 2012B20 SPAN / IS	3.3	8.40	21.0	17.7	14.0	84.4	0.0	11,889	219.03	3.778	0.27	
VULCAN 2002M3 / IS	3.3	8.43	21.1	17.8	14.4	84.1	0.1	478	94.36	3.778	0.01	
VULCAN V2002M3 SPAN - GEN 2 / IS	3.3	8.40	21.1	18.0	13.0	85.9	0.1	2,600	124.14	3.778	0.13	
OVER VARNISH:												
PPG 3708001 / EV	2.1	8.10	47.5	41.4	13.2	36.3	2.9	11,366	0.00	3.778	0.00	
PPG 3708002 / EV	1.7	8.00	38.0	33.1	8.2	33.8	2.2	1,067	0.00	3.778	0.00	
PPG 8030821 / TACTILE / OV	2.1	8.02	41.5	36.9	11.8	40.7	2.9	2,099	229.30	3.778	0.02	
PPG802181 / MATTE / OV	2.1	8.20	38.0	32.1	10.4	32.4	2.9	0	0.00	3.778	0.00	
PPG802181 CLEAR WATER / OV	2.1	8.15	38.0	32.0	10.4	40.7	2.9	282	86.20	3.778	0.00	
PPG802181 / MATTE / OV	2.1	8.10	38.0	32.2	10.3	39.2	2.9	0	0.00	3.778	0.00	
METALAC S.P.A. / OV	1.00	8.84	42.2	37.0	12.4	41.4	2.4	0	0.00	3.778	0.00	
BASECOAT:												
PPG 370018 /	1.8	11.00	55.0	39.3	8.8	36.4	2.4	530	128.10	3.778	0.01	
INK (In.)					20			20	11,271	3.778	0.04	
PRINTER CLEANER* (Acetone - VOC Exempt)									34		0.00	
PARTS CLEANER* (Safin - VOC Exempt)									0		0.00	
TOTAL VOC EMISSIONS									126.76		502.89	

GALLONS	B VOC/gal	GALLONS	VOC	VOC
A	B	C	D=AB	E=AB*H
126.76	5.50	0	0	0

\*\* PARTS CLEANER:

GALLONS USED	B VOC/gal	GALLONS	VOC RECLAIMED	VOC EMISSIONS
A	B	C=AB	D	E=AB-H
0	6.5	0	0	0

MATERIAL	GALLONS OF COATING (LBS/MONTH)	POUNDS OF INK & SOLVENT (LBS/MONTH)	COATING DENSITY (LBS/GAL)	EMISSION FACTOR	WEIGHT PERCENT	DOSE EMISSION POUNDS/MONTH (111-86-4)	WEIGHT PERCENT	DOSE EMISSION POUNDS/MONTH (113-96-4)	WEIGHT PERCENT	DOSE EMISSION POUNDS/MONTH (113-96-4)	WEIGHT PERCENT	ETHYL BENZENE EMISSIONS POUNDS/MONTH (108-14-4)	WEIGHT PERCENT	ETHYL BENZENE EMISSIONS POUNDS/MONTH (108-14-4)	WEIGHT PERCENT	XYLENE EMISSIONS POUNDS/MONTH (106-16-5)	WEIGHT PERCENT	XYLENE EMISSIONS POUNDS/MONTH (106-16-5)	WEIGHT PERCENT	FORMALDEHYDE (DOH) EMISSION POUNDS/MONTH (50-00-0)	WEIGHT PERCENT	FORMALDEHYDE (DOH) EMISSION POUNDS/MONTH (50-00-0)	WEIGHT PERCENT	METHANOL POUNDS/MONTH (65-09-5)	WEIGHT PERCENT	METHANOL POUNDS/MONTH (65-09-5)	WEIGHT PERCENT	PHENOL POUNDS/MONTH (94-09-2)
<b>INSIDE SPRAY</b>																												
PPG 2012B20 SPAN / IS	0	0.00	3.778	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	0.00	0.00	0.10	0.0000	
PPG 2012B20 SPAN / IS	11,889	4.46	3.778	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	0.00	0.10	3.766	0.0000	
VULCAN 2002M3 / IS	478	4.40	3.778	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	0.00	0.00	0.00	0.0000	
VULCAN V2002M3 SPAN - GEN 2 / IS	2,600	4.40	3.778	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	0.00	0.00	0.00	0.0000	
<b>OVER VARNISH</b>																												
PPG 3708001 / EV	11,366	8.80	3.778	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	0.00	0.00	0.00	0.0000	
PPG 3708002 / EV	1,067	8.80	3.778	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	0.00	0.00	0.00	0.0000	
PPG 8030821 / TACTILE / OV	2,099	8.90	3.778	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	0.00	0.00	0.00	0.0000	
PPG802181 / MATTE / OV	0	8.10	3.778	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	0.00	0.00	0.00	0.0000	
PPG802181 CLEAR WATER / OV	282	8.10	3.778	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	0.00	0.00	0.00	0.0000	
PPG802181 / MATTE / OV	0	8.10	3.778	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	0.00	0.00	0.00	0.0000	
METALAC S.P.A. / OV	0	8.84	3.778	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	0.00	0.00	0.00	0.0000	
<b>BASECOAT</b>																												
PPG 370018 /	530	9.10	3.778	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	0.00	0.00	0.00	0.0000	
INK (In.)	20	11,271	3.778	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	0.00	0.00	0.00	0.0000	
PRINTER CLEANER* (Acetone - VOC Exempt)																												0.0000
PARTS CLEANER* (Safin - VOC Exempt)																												0.0000
FACILITY TOTAL EMISSIONS POUNDS						4.76		0.41		0.81		0.11		0.14		0.71		0.00		0.00		0.00		0.00		0.00	0.0000	
FACILITY TOTAL EMISSIONS TONS						0.002		0.007		0.005		0.001		0.001		0.001		0.000		0.000		0.000		0.000		0.000	0.000	

BASED ON THE COMPLIANCE SOURCE TESTING PERFORMED ON OCTOBER 8 & 11, 2019 BY MONTROSE AIR QUALITY SERVICES - BTO A11

CAPTURE EFFICIENCY:	87.0%
DESTRUCTION EFFICIENCY:	96.0%
TOTAL CONTROL EFFICIENCY:	86.2%
EMISSION FACTOR:	3.778

MATERIAL	B VOC/gal COATING MINUS WATER	COATING DENSITY (lb/gal)	WEIGHT % SOLID	VOLUME % SOLID	WEIGHT % SOLVENT	WEIGHT % WATER	B VOC/gal SOLID	CANS PRODUCED	GALLON COATING APPLIED	GALLON SOLIDS APPLIED	EMISSION FACTOR	VOC EMISSIONS (Tons)
	A	B	S1	S2	C	D	E	F	G	H=92189kg	I	J=16x2999kg
<b>PRODUCTION - LINE 3</b>												
EQUIVALENT 12 OZ. PRODUCTION ON LINE 3: 17,796.269												
Inside Spray:												
PPG 2012B20 SPAN / IS	3.3	8.50	19.5	16.5	11.9	88.2	0.1	0	0.00	0.00	0.00	0.00
PPG 2012B20 SPAN / IS	3.3	8.40	21.0	17.7	14.0	84.4	0.0	7,379	1300.00	0.00	0.29	
VULCAN 2002M3 / IS	3.3	8.43	21.1	17.8	14.4	84.1	0.1	299	62.26	0.00	0.01	
VULCAN V2002M3 SPAN - GEN 2 / IS	3.3	8.43	21.1	18.0	13.0	85.9	0.1	4,628	872.74	0.00	0.17	
OVER VARNISH:												
PPG 3708001 / EV	2.1	8.10	47.5	41.4	13.2	36.3	2.9	124	51.37	0.00	0.00	
PPG 3708002 / EV	1.7	8.00	38.0	33.1	8.2	33.8	2.2	632	140.72	0.00	0.02	
PPG 8030821 / TACTILE / OV	2.1	8.02	41.5	36.9	11.8	40.7	2.9	891	229.42	0.00	0.02	
PPG802181 / MATTE / OV	2.1	8.20	38.0	32.0	10.4	40.7	2.9	0	0.00	0.00	0.00	
PPG802181 CLEAR WATER / OV	2.1	8.10	38.0	32.0	10.4	40.7	2.9	182	62.80	0.00	0.01	
PPG802181 / MATTE / OV	2.1	8.15	38.0	32.2	10.3	40.7	2.9	0	0.00	0.00	0.00	
METALAC S.P.A. / OV	1.00	8.84	42.2	37.0	12.4	41.4	2.4	0	0.00	0.00	0.00	
BASECOAT:												
PPG 370018 /	1.8	11.00	55.0	39.3	8.8	36.4	2.4	199	78.20	0.00	0.01	
INK (In.)					20			20	5,994	0.00	0.06	
PRINTER CLEANER* (Acetone - VOC Exempt)									21		0.00	
PARTS CLEANER* (Safin - VOC Exempt)									0		0.00	
TOTAL VOC EMISSIONS									0.96		3.21	
VOC EMISSIONS									0.96		3.21	

GALLONS	B VOC/gal	GALLONS	VOC	VOC
A	B	C	D=AB	E=AB*H
0	6.5	0	0	0

\*\* PARTS CLEANER:

GALLONS USED	B VOC/gal	GALLONS	VOC RECLAIMED	VOC EMISSIONS
A	B	C=AB	D	E=AB-H
0	6.5	0	0	0

MATERIAL	GALLONS OF COATING (LBS/MONTH)	POUNDS OF INK & SOLVENT (LBS/MONTH)	COATING DENSITY (LBS/GAL)	EMISSION FACTOR	WEIGHT PERCENT	DOSE EMISSION POUNDS/MONTH (111-86-4)	WEIGHT PERCENT	DOSE EMISSION POUNDS
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