



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604**

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Ardagh Metal Beverage USA Inc.

FROM: Valeria Apolinario, Environmental Engineer
AECAB (MN/OH)

THRU: Brian Dickens, Section Supervisor
AECAB (MN/OH)

TO: File

BASIC INFORMATION

Facility Name: Ardagh Metal Beverage USA Inc.

Facility Location: 10444 Waterville Street, Whitehouse, OH 43571

Date of Inspection: May 10, 2022

EPA Inspector(s):

1. Valeria Apolinario, Environmental Engineer
2. Karyn DeFranco, Environmental Scientist

Other Attendees:

1. Phillip Haack, Plant Engineering Manager
2. Daniel Rogers, Plant Manager
3. Jim Antia, Senior Environmental Engineer

Contact Email Address: phillip.haack@ardaghgroup.com

Purpose of Inspection: Determine compliance with the facility's Title V permit, with a focus on HAP and VOC emission limits, and New Source Performance Standards for the Beverage Can Surface Coating Industry (NSPS WW)

Facility Type: Metal Can Manufacturing

Regulations Central to Inspection: The facility is subject to NSPS WW and holds a Title V permit. The facility's Title V permit obligates the operation of a regenerative thermal oxidizer

(RTO) to control emissions from the beverage can lines along with monitoring requirements from NSPS WW. This includes equipping the RTO with a continuous temperature monitor and recording device. The facility is required to report when the incinerator is more than 50 °F below its setpoint.

Arrival Time: 1:27 pm

Departure Time: 3:40 pm

Inspection Type:

- ☒ Unannounced Inspection
- ☐ Announced Inspection

OPENING CONFERENCE

- ☒ Presented Credentials
- ☒ Stated authority and purpose of inspection
- ☒ Provided Small Business Resource Information Sheet
- ☒ Provided CBI warning to facility

The following information was obtained verbally from Phillip Haack and Daniel Rogers unless otherwise noted.

Company Ownership: The facility was previously owned by Rexam Can Beverage Company but was purchased by Ardagh Metal Beverage USA Inc. in 2016.

Process Description:

Ardagh Metal Beverage USA Inc. (Ardagh) currently operates three beverage can production lines, one 10- and 12-fluid ounce line (K012) and two 24-fluid ounce lines (K010 and K011). The process is similar for each line and only differs in the size of the final product. First, aluminum coil is unwound and sent into a ‘cupper’, which produces open-top cylindrical bases. There is one cupper for K012 and another for K010 and K011. These are then conveyed into ‘body makers’, which stamp the bases into slimmer cylindrical shapes. Oil mist, from lubricant used in the body making process, is collected and sent to waste collection. The newly formed cans are then trimmed, washed with a cleaner (consisting of water and a low quantity of hydrofluoric and sulfuric acid), dried, and sent into the decorator process. The exterior surface of the can is decorated with a print that is rolled onto the cans continuously. An overvarnish is automatically applied atop of the print and subsequently cured and dried in ovens. The inside of the cans is sprayed with an interior coating to protect the aluminum against acidity. This interior coating is cured in the internal baking oven (IBO). The cans are then conveyed to a necker, which forms the top of the can. Ardagh does not create the top pieces of the cans, nor does the facility attach these pieces. Once the necks are formed, the cans are inspected and then packaged.

The RTO controls emissions from the IBOs associated with all 3 lines and the decorator ovens associated with K012 and K010.

The facility has synthetic minor limits for HAPs and emission limits for VOCs. Internal calculations for emissions of HAPs and VOCs were requested.

Staff Interview:

- Operations at Ardagh run for 24 hours a day, 7 days a week. There are approximately 128 employees at the facility.
- A bypass duct is utilized to route emissions to the atmosphere when the RTO is undergoing annual maintenance.
- The latest stack test for the RTO was conducted on April 6, 2022.
- The RTO setpoint is 1605 °F, as a 3-hour average determined by a performance test conducted in 2017. A more recent stack test was conducted in April 2022. Both reports were requested.
- K009, a 24-fluid ounce line listed in the facility's Title V permit, has not run in several years.
- The RTO has an instantaneous low temperature alarm at 1590 °F and a low instantaneous temperature critical alarm at 1580 °F.
- Every 24 hours, an email is sent to the plant engineering manager with the 3-hour average temperatures of the RTO. Records of these temperatures were requested.

TOUR INFORMATION

EPA Tour of the Facility: Yes

Data Collected and Observations:

EPA toured the facility to observe all beverage production and coating lines. Emission units K009, K010, and K011 were not operating at the time of the inspection, however, K012 was in operation. At the time of the inspection, the instantaneous RTO temperature was 1603 °F.

Photos and/or Videos: were not taken during the inspection.

Field Measurements: were not taken during this inspection.

CLOSING CONFERENCE

☒ Provided U.S. EPA point of contact to the facility

Requested documents:

- Stack test report from 2017 for the RTO
- Stack test report from 2022 for the RTO, when completed
- Internal VOC calculations from the past 12 months
- TRI calculations from the past year (2021)
- SDS sheets for the acids, cleaner, interior coatings, exterior paints, and coolant
- Deviation reports from the past year
- 3-hour temperature averages for the RTO from the past year
- Flow diagram for projected-affected EUs at Whitehouse; this diagram showed which emission units were tied to the RTO and pathways for emissions of VOC/HAP.

DIGITAL SIGNATURES

Report Author: Apolinario, Valeria  Digitally signed by Apolinario, Valeria
Date: 2022.07.07 14:50:35 -05'00'

Section Supervisor: NATALIE SCHULZ  Digitally signed by NATALIE SCHULZ
Date: 2022.07.07 16:03:40 -05'00' for Brian Dickens