

Commonwealth of Kentucky
Division for Air Quality
STATEMENT OF BASIS / SUMMARY

Conditional Major, Operating
Permit: F-26-014

Montebello Packaging Inc.
650 Industrial Drive
Lebanon, KY 40033

March 23, 2026
Qinyi Wang, Reviewer

SOURCE ID: 21-155-00028
AGENCY INTEREST: 2908
ACTIVITY: APE20250002

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SECTION 1 – SOURCE DESCRIPTION

SIC Code and description: 3499, Fabricated Metal Products

Single Source Det. Yes No If Yes, Affiliated Source AI:

Source-wide Limit Yes No If Yes, See Section 4, Table A

28 Source Category Yes No If Yes, Category:

County: Marion

Nonattainment Area N/A PM₁₀ PM_{2.5} CO NO_x SO₂ Ozone Lead

If yes, list Classification: N/A

PTE* greater than 100 tpy for any criteria air pollutant Yes No

If yes, for what pollutant(s)?

PM₁₀ PM_{2.5} CO NO_x SO₂ VOC

PTE* greater than 250 tpy for any criteria air pollutant Yes No

If yes, for what pollutant(s)?

PM₁₀ PM_{2.5} CO NO_x SO₂ VOC

PTE* greater than 10 tpy for any single hazardous air pollutant (HAP) Yes No

If yes, list which pollutant(s): Xylenes, Methyl Isobutyl Ketone

PTE* greater than 25 tpy for combined HAP Yes No

*PTE does not include self-imposed emission limitations.

Description of Facility:

Montebello Packaging Inc. makes flexible aluminum tubes and aerosol cans for automotive, agricultural, personal care and pharmaceutical product industries. Aluminum is extruded in the impact extrusion presses to form tubes and cans. Coatings are applied inside and outside. Inside coatings are spread by spray machines, outside coatings are applied by roll coaters. Coatings are solvent based.

SECTION 2 – CURRENT APPLICATION AND EMISSION SUMMARY FORM

Permit Number: F-26-014

Activity: APE20250002

Application Received: November 13, 2025

Application Complete Date(s): March 30, 2026

Permit Action: Initial Renewal Significant Rev Minor Rev Administrative

Construction/Modification Requested? Yes No

Previous 502(b)(10) or Off-Permit Changes incorporated with this permit action Yes No

Description of Action:

Montebello Packaging Inc. submitted a renewal permit application for their manufacturing facility located in Lebanon, Kentucky. No changes to existing permit limits or requirements are being requested. The renewal permit application includes the following updates:

- Update of paint and adhesive materials used in Coating Lines EP01-EP05 and EP08-EP09. Coating line (EP03) processes 3/4-inch tubes instead of the 1/2-inch tubes currently specified.
- Coating line (EP04) processes 1 3/8-inch tubes instead of the 1/2-inch tubes currently specified.
- Coating line (EP05) processes 1 1/2-inch tubes instead of the 1/2-inch tubes currently specified. Emissions from this line are routed to RTO#2.
- Removing Coating Line 6 (EP06) for coating tubes.
- Request to replace aerosol cans with 1 1/2-inch tubes processed on Line 8.
- Removing Insignificant Activity 01, Dip Tank.
- The application also requested to rename the KYEIS designation for Coating Lines 7 and 8 and the natural gas combustion units which are not feasible as KYEIS designations cannot be reused to another emissions unit.

F-26-014 Emission Summary		
Pollutant	2025 Actual (tpy)	PTE F-26-014 (tpy)
CO	0.88	25.68
NO _x	1.04	30.57
PT	0.30	8.53
PM ₁₀	0.30	8.53
PM _{2.5}	0.12	5.12
SO ₂	0.006	0.18
VOC	6.14	640**
Lead	N/A	0.00015
Greenhouse Gases (GHGs)		
Carbon Dioxide	1,251	36,618
Methane	0.02	0.70
Nitrous Oxide	0.03	0.07
CO ₂ Equivalent (CO ₂ e)	1,260	36,656
Hazardous Air Pollutants (HAPs)		
2-Butoxy Ethanol	0.12	0
Ethyl Benzene	N/A	2.83
Glycol Ethers	N/A	5
Hexane	N/A	0.55
Isophorone	0.38	2.13
Methyl Isobutyl Ketone	N/A	13.26*
o-Xylene	N/A	8.43
Toluene	0.25	6.9
Xylenes	6.14	10.26*
Combined HAPs:	0.77	45.14*

**Emissions limited by federally-enforceable emission limitations to ensure the source remains below major source thresholds.*

***Uncontrolled emissions VOC, controlled VOC is 54.14 TPY.*

SECTION 3 – EMISSIONS, LIMITATIONS AND BASIS

Emission Unit #01-05 and 07, 0809 - Coating Lines and Natural Gas Combustion				
Pollutant	Emission Limit or Standard	Regulatory Basis for Emission Limit or Standard	Emission Factor Used and Basis	Compliance Method
VOC	Source wide 90 tpy	401 KAR 52:030	Material Balance & SDS	RTO #1 & 2, Testing
Single HAP	Source wide 9 tpy	To preclude 401 KAR 52:020	Material Balance & SDS	RTO #1 & 2, Testing
Combined HAPs	Source-wide 22.5 tpy	To preclude 401 KAR 52:020	Material Balance & SDS	RTO #1 & 2, Testing
PM	2.34 lbs/hr	401 KAR 59:010, Section 3(2)	Material Balance & SDS with 50% T.E. for inner coating	Filters and Dust Collectors, 95% C.E., Manufacturer's guarantee
	Opacity 20%	401 KAR 59:010, Section 3(1)	N/A	Weekly Visual Observation

Initial Construction Date: *See Below*

Process Description:

Emission Point 01 (EP 01) Coating Line 1 (A1, A3, and A5)

Description:

Line for Coating 7/8" Tubes, consists of Spray Booth A1 for Inner Coating, Roll Coaters A3 and A5 for application of Outer Coating and Decorative Graphics
 Construction Date: June 30, 1998

Emission Point 02 (EP 02) Coating Line 2 (B1, B3, and B5)

Description:

Line for Coating 1 1/8" Tubes, consists of Spray Booth B1 for Inner Coating, Roll Coaters B3 and B5 for application of Outer Coating and Decorative Graphics
 Construction Date: June 30, 1998

Emission Point 03 (EP03) Coating Line 3 (C1, C3, and C5)

Description:

Line for Coating 3/4" Tubes, consists of Spray Booth C1 for Inner Coating, Roll Coaters C3 and C5 for application of Outer Coating and Decorative Graphics
 Construction Date: March 27, 2001

Emission Point 04 (EP04) Coating Line 4 (D1, D3, and D5)

Description:

Line for Coating 1 3/8" Tubes, consists of Spray Booth D1 for Inner Coating, Roll Coaters D3 and D5 for application of Outer Coating and Decorative Graphics
 Construction Date: August 2003

Emission Unit #01-05 and 07, 0809 - Coating Lines and Natural Gas Combustion

Emission Point 05 (EP 05) Coating Line 5 (E1, E3, and E5)

Description:

Line for Coating 1 1/2" Tubes, consists of Spray Booth E1 for Inner Coating, Roll Coaters E3 and E5 for application of Outer Coating and Decorative Graphics
Construction Date: February 2004 (Modified January 2024)

Emission Point 07 (EP 07): Source Wide NG usage (71.2 MMBtu/hr)

Emission Point 08 and Emission Point 09 (EP0809) Coating Line 7 (G1, G2, G3, G4, G5, G6, and G7) and Coating Line 8 (H1, H3, and H5)

Description for Coating Line 7 (G1, G2, G3, G4, G5, G6, and G7):

Line for Coating Aerosol Cans, consists of Spray Booth G2 for Inner Coating, Roll Coaters G4 and G6 for application of Outer Coatings, Off-set Printer G5 for Decorative Graphics, Curing Ovens G3 and G7, and Washing Machine G1.
Construction Date: October 2011 (Modified December 2024)

Description for Coating Line 8 (H1, H3, and H5):

Line for Coating 1 1/2" Tubes, consists of Spray Booth H1 for Inner Coating, Roll Coaters H3 and H5 for application of Outer Coating and Decorative Graphics.
Construction Date: September 2015 (Modified February 2025)

Emission Point 01 thru 05

- Control Equipment Anguil Regenerating Thermal Oxidizer (RTO #1)
 - Rated capacity 3.0 MMBtu/hr
 - Fuel usage Natural Gas
 - Construction Date: 1998
 - Destruction Efficiency 91% tested on May 22, 2024
 - Capture Efficiency 98.1% tested on May 25, 2005
- Control Equipment Panel Filters
 - Estimated Control Efficiency 95% for PM/PM₁₀/PM_{2.5}

The source shall conduct a performance test on the thermal oxidizer, RTO #1 within five years of the most recent performance test, during which a minimum operating temperature of the thermal oxidizer will be determined.

Emission Point 08 & 09

- Control Equipment Anguil - Model 150, Regenerating Thermal Oxidizer (RTO #2)
 - Rated capacity 4.0 MMBtu/hr
 - Fuel usage Natural Gas
 - Construction Date: May 2012
 - Destruction Efficiency 98.11% tested on July 25, 2025
 - Capture Efficiency 100% tested on September 11, 2014
- Control Equipment Dust Hog Type-SFC 8-2, Dust Collector equipped with Cartridge Filters (DH #1)
 - Estimated Control Efficiency 95% for PM/PM₁₀/PM_{2.5}

Emission Unit #01-05 and 07, 0809 - Coating Lines and Natural Gas Combustion

The source shall conduct a performance test on the thermal oxidizer, RTO #2 within five years of the most recent performance test, during which a minimum operating temperature of the thermal oxidizer will be determined.

Applicable Regulations:

401 KAR 59:010, *New Process Operations*, applicable to each affected facility associated with a process operation commenced on or after July 2, 1975.

State-Origin Requirements:

401 KAR 63:020; *Potentially hazardous matter or toxic substances*, applicable to each affected facility which emits or may emit potentially hazardous matter or toxic substances.

Precluded Regulations:

401 KAR 59:225, *Miscellaneous metal parts coating*, does not apply because the permittee has taken limits on emissions to avoid triggering major source thresholds, and the source is located in an attainment county for ozone.

Comments:

Coating Lines 1, 2, 3, 4, 5 and 8 Coating Lines for metal tubes

Consists of (EP 01, 02, 03,04 and 05) collapsible metal tube manufacturing lines with RTO#1 control.

Coating Lines 8 and 9 (EP0809) are routed to and controlled by RTO#2.

Emission Point 07, Source-wide NG usage

Usage was 71.2 MMBtu/hr.

Emission Point 0809: Coating Line 7 for aerosol cans and Coating Line 8 for tubes

For coating line 7, the process begins with forming and shaping aluminum aerosol cans from rolled aluminum in an impact extrusion press. The formed cans move to a trimming and brushing machine then to a natural gas-fired washing machine for final preparation prior to coating. The first coating is applied internal to the can by a lacquer spray machine then cured in a natural gas-fired oven. The second coating is applied external to the can as the basecoat with a roll coating machine. After the basecoat application, decorative designs are applied in the third coating using an off-set printing machine. The final coating is applied external to the can by an over varnish roll coating machine then cured in a second natural gas-fired curing oven.

1. Spray machines G2: Internal lacquer spray

The spray machines are equipped with electrostatic-airless spray guns. Total PM emissions are calculated based on a transfer efficiency of 50 percent.

G2 (EP 08): VOC and HAP emissions are controlled by RTO #2;

PM emissions are controlled by dust collector (DH#1) and then vented to the RTO #2 for additional control / destruction.

2. Roll Coaters G4: External basecoat

Transfer efficiencies for roll coaters are estimated to be 95 percent.

G4 (EP 08): VOC and HAP emissions are controlled by RTO #2;

3. Off-set printing machines G5: Graphic printing

Emission Unit #01-05 and 07, 0809 - Coating Lines and Natural Gas Combustion

G5 (EP 08): VOC and HAP emissions are controlled by RTO #2;

4. Roll Coaters G6: External over varnish

Transfer efficiencies for roll coaters are estimated to be 95 percent.

G4 (EP 08): VOC and HAP emissions are controlled by RTO #2;

For coating line 8, the line consists of Spray Booth H1 for the application of the inner coating and Roll Coaters H3 and H5 for the application of the outer coating and decorative graphics.

VOC emissions controlled/uncontrolled

Controlled VOC emissions are under 100 tpy, however, uncontrolled VOC emissions are in excess of 100 tpy which make this a major source. The source has accepted limitations to preclude major source status.

SECTION 3 – EMISSIONS, LIMITATIONS AND BASIS (CONTINUED)

Testing Requirements/Results

Emission Unit(s)	Control Device	Parameter	Regulatory Basis	Frequency	Test Method	Permit Limit	Test Result	Thruput and Operating Parameter(s) Established During Test	Activity Graybar	Date of last Compliance Testing
01-05	RTO #1	VOC Capture	401 KAR 52:030	Initial and every 5 years	Method 204	N/A	98.1%	Flowrate: 2683 CFM	CMN20050002	5/25/2005
01-05	RTO #1	VOC DRE	401 KAR 52:030	every 5 years	Method 25A	N/A	98.6%	Combustion Temperature 1482 °F	CMN20050002	5/25/2005
01-05	RTO #1	VOC DRE	401 KAR 52:030	every 5 years	Method 25A	N/A	91.5%	Combustion Temperature 1514 °F	CMN20100001	6/9/2010
01-05	RTO #1	VOC DRE	401 KAR 52:030	every 5 years	Method 25A	N/A	97.59%	Combustion Temperature 1483 °F	CMN20140001	9/11/2014
01-05	RTO #1	VOC DRE	401 KAR 52:030	every 5 years	Method 25A	N/A	88.94%	Process Rate 25913 pieces/hr	CMN20200001	4/21/2020
01-05	RTO #1	VOC DRE	401 KAR 52:030	every 5 years	Method 25A	N/A	91%	Combustion Temperature 1500 °F	CMN20240001	5/22/2024
08-09	RTO #2	VOC Capture	401 KAR 52:030	Initial	Method 204, PTE	N/A	100%	Air flow > 200 ft/min	CMN20140001	9/11/2014
08-09	RTO #2	VOC DRE	401 KAR 52:030	Initial and every 5 years	Method 25A	N/A	97.87%	Combustion Temperature 1400 °F	CMN20140001	9/11/2014

08-09	RTO #2	VOC DRE	401 KAR 52:030	every 5 years	Method 25A	N/A	96.15%	Process Rate 25913 pieces/hr	CMN20200001	4/21/2020
08-09	RTO #2	VOC DRE	401 KAR 52:030	every 5 years	Method 25A	N/A	98.11%	Combustion Temperature 1572 °F	CMN20250001	7/15/2025

Footnotes:

SECTION 4 – SOURCE INFORMATION AND REQUIREMENTS

Table A - Group Requirements:

Emission and Operating Limit	Regulation	Emission Unit
90 tpy of VOC emissions	401 KAR 52:030, <i>Federally-enforceable permits for nonmajor sources</i>	Source-wide
9.0 tpy of individual HAP emissions	To preclude major source status for HAP	Source-wide
22.5 tpy of combined HAP emissions	To preclude major source status for HAP	Source-wide

Table B - Summary of Applicable Regulations:

Applicable Regulations	Emission Unit
401 KAR 59:010, <i>New Process Operations.</i>	EP 01-05, 0809
401 KAR 63:020, <i>Potentially hazardous matter or toxic substances.</i>	EP 01-05, 07, 0809

Table C - Summary of Precluded Regulations:

Precluded Regulations	Emission Unit
401 KAR 59:225, <i>Miscellaneous metal parts coating</i> , does not apply because the permittee has taken limits on emissions to avoid triggering major source thresholds, and the source is located in an attainment county for ozone.	

Table D - Summary of Non Applicable Regulations:

N/A

Air Toxic Analysis

401 KAR 63:020, *Potentially Hazardous Matter or Toxic Substances*

The Division for Air Quality (Division) has performed modeling using SCREEN View on March 25, 2026 of potentially hazardous matter or toxic substances (Cumene, Ethyl Benzene, Formaldehyde, Glycol Ethers, Hexane, Isophorone, Methyl Ethyl Ketone, Methyl Isobutyl Ketone, Naphthalene, o-Cresol, o-Xylene, Phenol, Toluene, Xylenes) that may be emitted by the facility based upon the process rates, material formulations, stack heights and other pertinent information provided by the applicant. Based upon this information, the Division has determined that the conditions outlined in this permit will assure compliance with the requirements of 401 KAR 63:020.

Single Source Determination

N/A

SECTION 5 – PERMITTING HISTORY

Permit	Permit Type	Activity #	Complete Date	Issuance Date	Summary of Action	PSD/Syn Minor
F-05-017	Renewal	APE20050001	4/16/2005	1/23/2006	Renewal Permit	N/A
F-05-017 R1	Minor Revision	APE20070001	12/20/2007	1/14/2008	Construction of EP06	N/A
F-10-041	Renewal	APE20100001	8/28/2010	2/14/2011	Renewal Permit	N/A
F-10-041 R1	Minor Revision	APE20110001	9/22/2011	10/31/2011	Addition of five production coating lines EP08-12	N/A
F-15-033	Renewal	APE20150001	8/3/2015	12/1/2015	Renewal Permit	N/A
F-21-001	Renewal	APE20200001	1/5/2021	3/14/2021	Renewal Permit	N/A

SECTION 6 – PERMIT APPLICATION HISTORY
None

APPENDIX A – ABBREVIATIONS AND ACRONYMS

AAQS	– Ambient Air Quality Standards
BACT	– Best Available Control Technology
Btu	– British thermal unit
CAM	– Compliance Assurance Monitoring
CO	– Carbon Monoxide
Division	– Kentucky Division for Air Quality
ESP	– Electrostatic Precipitator
GHG	– Greenhouse Gas
HAP	– Hazardous Air Pollutant
HF	– Hydrogen Fluoride (Gaseous)
MSDS	– Material Safety Data Sheets
mmHg	– Millimeter of mercury column height
NAAQS	– National Ambient Air Quality Standards
NESHAP	– National Emissions Standards for Hazardous Air Pollutants
NO _x	– Nitrogen Oxides
NSR	– New Source Review
PM	– Particulate Matter
PM ₁₀	– Particulate Matter equal to or smaller than 10 micrometers
PM _{2.5}	– Particulate Matter equal to or smaller than 2.5 micrometers
PSD	– Prevention of Significant Deterioration
PTE	– Potential to Emit
SO ₂	– Sulfur Dioxide
TF	– Total Fluoride (Particulate & Gaseous)
VOC	– Volatile Organic Compounds