



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT

JUL 11 2011

Gerardo C. Rios, Chief
Permits Office (AIR-3)
U.S. EPA - Region IX
75 Hawthorne St
San Francisco, CA 94105

**Re: Notice of Preliminary Decision - Federally Mandated Operating Permit
District Facility # N-3243
Project # N-1110310**

Dear Mr. Rios:

Enclosed for your review and comment is the District's analysis of Silgan's application for the Federally Mandated Operating Permit for its can coating operation located at Modesto, California.

The notice of preliminary decision for this project will be published approximately three days from the date of this letter. Please submit your written comments on this project within the 45-day comment period which begins on the date of publication of the public notice.

Thank you for your cooperation in this matter. If you have any questions regarding this matter, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Sincerely,

David Warner
Director of Permit Services

cc: Dennis Roberts, Permit Services Engineer

Attachments

Seyed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061
www.valleyair.org

Southern Region
2700 M Street, Suite 275
Bakersfield, CA 93301-2373
Tel: (661) 326-6900 FAX: (661) 326-6985



San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

JUL 11 2011

Mike Tollstrup, Chief
Project Assessment Branch
Air Resources Board
P O Box 2815
Sacramento, CA 95812-2815

**Re: Notice of Preliminary Decision - Federally Mandated Operating Permit
District Facility # N-3243
Project # N-1110310**

Dear Mr. Tollstrup:

Enclosed for your review and comment is the District's analysis of Silgan's application for the Federally Mandated Operating Permit for its can coating operation located at Modesto, California.

The notice of preliminary decision for this project will be published approximately three days from the date of this letter. Please submit your written comments on this project within the 30-day comment period which begins on the date of publication of the public notice.

Thank you for your cooperation in this matter. If you have any questions regarding this matter, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Sincerely,

David Warner
Director of Permit Services

cc: Dennis Roberts, Permit Services Engineer

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San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT

JUL 11 2011

Rich Williams
Silgan Containers Mfg. Corp.
4210 Yosemite Blvd.
Modesto, CA 95354

**Re: Notice of Preliminary Decision - Federally Mandated Operating Permit
District Facility # N-3243
Project # N-1110310**

Dear Mr. Williams:

Enclosed for your review and comment is the District's analysis of Silgan's application for the Federally Mandated Operating Permit for its can coating operation located at Modesto, California.

The notice of preliminary decision for this project will be published approximately three days from the date of this letter. Please submit your written comments on this project within the 30-day comment period which begins on the date of publication of the public notice.

Thank you for your cooperation in this matter. If you have any questions regarding this matter, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Sincerely,

David Warner
Director of Permit Services

cc: Dennis Roberts, Permit Services Engineer

Attachments

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Modesto Bee

**NOTICE OF PRELIMINARY DECISION
FOR THE PROPOSED ISSUANCE OF
FEDERALLY MANDATED OPERATING PERMITS**

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Air Pollution Control District solicits public comment on the proposed issuance of the Federally Mandated Operating permits to Silgan Containers Mfg. Corp. for its can coating operation located at Modesto, California.

The District's analysis of the legal and factual basis for this proposed action, project #N-1110310, is available for public inspection at http://www.valleyair.org/notices/public_notices_idx.htm and the District office at the address below. There are no emission changes associated with this proposed action. This will be the public's only opportunity to comment on the specific conditions of the proposed Federally Mandated Operating initial permits. If requested by the public, the District will hold a public hearing regarding issuance of this initial permit. For additional information, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900. Written comments on the proposed initial permit must be submitted within 30 days of the publication date of this notice to DAVID WARNER, DIRECTOR OF PERMIT SERVICES, SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT, 1990 E. GETTYSBURG AVE, FRESNO, CALIFORNIA 93726-0244.

SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT

Silgan Containers Mfg. Corp.

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TITLE V APPLICATION REVIEW

Project #: N-1110310
Deemed Complete: February 22, 2011

Engineer: Dennis Roberts
Date: June 27, 2011

Facility Number: N-3243
Facility Name: Silgan Containers Mfg. Corp.
Mailing Address: 4210 Yosemite Blvd.
Modesto, CA 95354

Contact Name: Rich Williams
Phone: (209) 521-6469

Responsible Official: Rich Williams
Title: Plant Manager

I. PROPOSAL

Silgan Containers Mfg. Corp. is proposing that an initial Title V permit be issued for its existing can manufacturing facility in Modesto, CA. The purpose of this evaluation is to identify all applicable requirements, determine if the facility will comply with those applicable requirements, and to provide the legal and factual basis for proposed permit conditions.

II. FACILITY LOCATION

Silgan Containers Mfg. Corp. is located at 4210 Yosemite Blvd, Modesto, in Stanislaus County, CA.

III. EQUIPMENT LISTING

A detailed facility printout listing all permitted equipment at the facility is shown in Attachment A.

A summary of the exempt equipment categories which describe the insignificant activities or equipment at the facility not requiring a permit is shown in Attachment B. This equipment is not exempt from facility-wide requirements.

IV. GENERAL PERMIT TEMPLATE USAGE

The applicant is requesting to use the following model general permit templates:

A. SJV-UM-0-3, Facility-wide Umbrella General Permit Template

The applicant has requested to utilize template #SJV-UM-03, Facility-wide Umbrella General Permit Template for permit N-3243-0-1. Based on the information submitted on the Template Qualification Form, the applicant qualifies for the use of this template.

V. SCOPE OF EPA AND PUBLIC REVIEW

Certain segments of the proposed Operating Permit are based on model general permit templates that have been previously subject to EPA and public review. The terms and conditions from the model general permit templates are included in the proposed permit and are not subject to further EPA and public review.

For permit applications utilizing model general permit templates, public and agency comments on the District's proposed actions are limited to the applicant's eligibility for model general permit template, applicable requirements not covered by the model general permit template, and the applicable procedural requirements for issuance of Title V Operating Permits.

The following permit conditions, including their underlying applicable requirements, originate from model general permit templates and are not subject to further EPA or public review.

Conditions 1 through 40 of the requirements for permit unit N-3243-0-1.

VI. APPLICABLE REQUIREMENTS ADDRESSED BY GENERAL PERMIT TEMPLATES

District Rule 1100, Equipment Breakdown (amended December 17, 1992) (Non-SIP replacement for Kern County Rule 111)

District Rule 1160, Emission Statements (adopted November 18, 1992)

District Rule 2010, Permits Required (amended December 17, 1992)

District Rule 2020, Exemptions (amended December 20, 2007)

District Rule 2031, Transfer of Permits (amended December 17, 1992)

District Rule 2040, Applications (amended December 17, 1992)

District Rule 2070, Standards for Granting Applications (amended December 17, 1992)

- District Rule 2080, Conditional Approval (amended December 17, 1992)
- District Rule 2520, Sections 5.2, 9.1.1, 9.4, 9.5, 9.7, 9.8, 9.9, 9.13.1, 9.13.2, 9.16 and 10.0, Federally Mandated Operating Permits (amended June 21, 2001)
- District Rule 4101, Visible Emissions (amended February 17, 2005)
- District Rule 4601, Architectural Coatings (amended December 17, 2009)
- District Rule 8011, General Requirements (amended August 19, 2004)
- District Rule 8021, Construction, Demolition, Excavation and Other Earthmoving Activities (amended August 19, 2004)
- District Rule 8031, Bulk Materials (amended August 19, 2004)
- District Rule 8041, Carryout and Trackout (amended August 19, 2004)
- District Rule 8051, Open Areas (amended August 19, 2004)
- District Rule 8061, Paved and Unpaved Roads (amended August 19, 2004)
- District Rule 8071, Unpaved Vehicle/Equipment Traffic Areas (amended September 16, 2004)
- 40 CFR Part 82, Subpart B and F, Stratospheric Ozone
- 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos

VII. APPLICABLE REQUIREMENTS NOT ADDRESSED BY GENERAL PERMIT TEMPLATES

- District Rule 2201, New and Modified Stationary Source Review Rule (amended April 21, 2011)
- District Rule 4201, Particulate Matter Concentration (amended December 17, 1992)
- District Rule 4202, Particulate Matter - Emission Rate (amended December 17, 1992)
- District Rule 4604, Can And Coil Coating Operations (amended September 20, 2007)
- 40 CFR Part 64 – Compliance Assurance Monitoring (CAM)

VIII. REQUIREMENTS NOT FEDERALLY ENFORCEABLE

For each Title V source, the District issues a single permit that contains the Federally Enforceable requirements, as well as the District-only requirements. The District-only requirements are not a part of the Title V Operating Permits. The terms and conditions that are part of the facility's Title V permit are designated as Federally Enforceable through Title V Permit.

This facility is subject to the following rules that are not currently federally enforceable:

District Rule 4102, Nuisance (amended December 17, 1992)

For this facility, condition 41 of the requirements for permit unit N-3243-0-1 is based on the rule listed above and is not Federally Enforceable through Title V.

IX. COMPLIANCE

A. Requirements Addressed by Model General Permit Templates

1. Facility Wide Requirements

The applicant is proposing to use a general permit template to address federally applicable facility-wide requirements. Section IV of template SJV-UM-0-3 includes a demonstration of compliance for all applicable requirements. Template conditions have been added to the facility wide requirements as condition numbers 1 through 40 to assure compliance with these requirements.

B. Requirements Not Addressed by Model General Permit Templates

1. New and Modified Stationary Source Review Rule (District NSR Rule)

The permit units are subject to the District NSR Rule upon application for Authority to Construct (ATC). In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting Permit to Operate (PTO) were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- b. N-3243-1-4: CAN SIDE SEAM STRIPE COATING LINE #1 WITH A SOUDRONIC WELD BODYMAKER, MODEL FBB 5501R/5501S, AND A PERMIT-EXEMPT CURING OVEN
- b. N-3243-2-3: CAN SIDE SEAM STRIPE COATING LINE #2 WITH A SOUDRONIC WELD BODYMAKER, MODEL FEB5501, AND A PERMIT-EXEMPT CURING OVEN
 - Conditions 3-7 from the current PTOs have been included as conditions 2-6 of the requirements for the proposed permits.

2. District Rule 2520, Federally Mandated Operating Permits

There are no federally applicable Greenhouse Gas (GHG) requirements for this source. It should be noted that the Mandatory Greenhouse Gas Reporting rule (40CFR Part 98) is not included in the definition of an applicable requirement

within Title V (per 40CFR 71.2). Therefore, there will be no further discussion of GHG in this evaluation.

3. District Rule 4201, Particulate Matter Concentration

The purpose of this rule is to protect the ambient air quality by establishing a particulate matter emission standard. Section 3.1 requires emissions to be at or below 0.1 grains of particulate matter per dry standard cubic foot of exhaust gas.

Both permit units at this facility are can side-seam coating lines which potentially emit PM as a result of the coating operations. The District has evaluated potential PM emissions from these units based on a source test which was performed by Best Environmental, Inc. on an inside side-seam coating line equipped with one applicator and with a three-stage dry filter system (similar to the units at this facility) and located at Silgan's facility at Riverbank, CA. EPA Methods 1-4 (moisture, velocity and volumetric flow rate), EPA Method 17 (filterable particulates), and EPA Method 202 (condensable particulates) were used. The test results (see Attachment D) indicated total particulate concentration of 0.007 gr/dscf when the line operated at full capacity. The units at this facility coat both the inside and outside stripe; however, it has been determined that the inside stripe requires more coating than the outside stripe while the test results at Riverbank were based on only an inside stripe. Therefore the following conservative estimate for the PM concentration will be made: $0.007 \text{ gr/dscf-applicator} \times 2 \text{ applicators} = 0.014 \text{ gr/dscf} < 0.1 \text{ gr/dscf}$.

- a. N-3243-1-4: CAN SIDE SEAM STRIPE COATING LINE #1 WITH A SOUDRONIC WELD BODYMAKER, MODEL FBB 5501R/5501S, AND A PERMIT-EXEMPT CURING OVEN
- b. N-3243-2-3: CAN SIDE SEAM STRIPE COATING LINE #2 WITH A SOUDRONIC WELD BODYMAKER, MODEL FEB5501, AND A PERMIT-EXEMPT CURING OVEN
 - Condition 1 of the requirements for these permit units assures compliance with this rule.

4. District Rule 4604 - Can And Coil Coating Operations

The purpose of this rule is to limit the emissions of volatile organic compounds (VOCs) from can and coil coating operations, and from organic solvent cleaning, storage and disposal associated with can coating and coil coating operations.

Section 5.1 (Tables 1 and 2) of the rule establishes limits on the VOC content of the coatings used in can coating operations.

Section 5.4.1 (Table 5) limits the VOC content to 25 grams per liter (0.21 lb/gal) for all solvents used for product cleaning or surface preparation or for repair and maintenance cleaning.

Section 5.4.2 limits the VOC content to 25 grams per liter (0.21 lb/gal) of solvents used for cleaning of all coating application equipment not used for sheet coating of three-piece cans unless the cleaning is performed in an APCO-approved emission control system.

Section 5.4.3.2 and Section 5.4.1 (Table 5) jointly limit solvents used for cleaning of equipment used for sheet coating of three-piece cans to 550 grams VOC per liter (4.6 lb/gal) until 9/30/2011 and to 250 grams VOC per liter (2.3 lb/gal) on and after 10/1/2011 if the cleaning methods of sections 5.4.4 through 5.4.7 are utilized. If the methods of sections 5.4.4 through 5.4.7 are not followed, the VOC content of the solvent is limited to 25 grams per liter.

Section 5.5 establishes requirements for storage and disposal of solvents and waste solvent cleaning materials.

Sections 6.2 and 6.3 establish record keeping requirements for coatings and solvents and require that records be maintained for five years.

- a. N-3243-1-4: CAN SIDE SEAM STRIPE COATING LINE #1 WITH A SOUDRONIC WELD BODYMAKER, MODEL FBB 5501R/5501S, AND A PERMIT-EXEMPT CURING OVEN
- b. N-3243-2-3: CAN SIDE SEAM STRIPE COATING LINE #2 WITH A SOUDRONIC WELD BODYMAKER, MODEL FEB5501, AND A PERMIT-EXEMPT CURING OVEN
 - Conditions 7 through 17 of the requirements for these permit units assure compliance with this rule.

5. 40 CFR Part 64, CAM

40 CFR Part 64 requires Compliance Assurance Monitoring (CAM) for units that meet the following three criteria:

- 1) the unit must have an emission limit for the pollutant;
- 2) the unit must have add-on controls for the pollutant; these are devices such as flue gas recirculation (FGR), baghouses, and catalytic oxidizers; and
- 3) the unit must have a pre-control potential to emit of greater than the major source thresholds.

- a. N-3243-1-4: CAN SIDE SEAM STRIPE COATING LINE #1 WITH A SOUDRONIC WELD BODYMAKER, MODEL FBB 5501R/5501S, AND A PERMIT-EXEMPT CURING OVEN
- b. N-3243-2-3: CAN SIDE SEAM STRIPE COATING LINE #2 WITH A SOUDRONIC WELD BODYMAKER, MODEL FEB5501, AND A PERMIT-EXEMPT CURING OVEN

These permit units only have emission limits for VOC; however, there are no add-on controls for VOC. Therefore, CAM is not required.

X. PERMIT SHIELD

A permit shield legally protects a facility from enforcement of the shielded regulations when a source is in compliance with the terms and conditions of the Title V permit. Compliance with the terms and conditions of the Operating Permit is considered compliance with all applicable requirements upon which those conditions are based, including those that have been subsumed.

A. Requirements Addressed by Model General Permit Templates

By using the model general permit template listed in Section IV of this evaluation, the applicant has requested that a permit shield be issued for requirements addressed in the template. The basis for each permit shield is discussed in the Permit Shield section of each template.

XI. PERMIT CONDITIONS

See *{draft}* operating permit beginning on the following page.

San Joaquin Valley Air Pollution Control District

FACILITY: N-3243-0-1

EXPIRATION DATE: 06/30/2012

FACILITY-WIDE REQUIREMENTS

1. {4362} The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
2. {4363} The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
3. {4364} The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0] Federally Enforceable Through Title V Permit
4. {4365} Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (12/20/07). [District Rule 2010, 3.0 and 4.0; and 2020] Federally Enforceable Through Title V Permit
5. {4366} The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 7.0; 2080; and 2520, 9.9.1 and 9.13.1] Federally Enforceable Through Title V Permit
6. {4367} A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District. [District Rule 2031] Federally Enforceable Through Title V Permit
7. {4368} Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District. [District Rule 2040] Federally Enforceable Through Title V Permit
8. {4369} The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate. Any amendments to these Facility-wide Requirements that affect specific Permit Units may constitute modification of those Permit Units.

Facility Name: SILGAN CONTAINERS MFR. CORP.
Location: 4000 YOSEMITE BLVD, MODESTO, CA 95357-7798
N-3243-0-1; Jun 29 2011 2:16PM - ROBERTSD

9. {4370} The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
10. {4371} The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.5.1] Federally Enforceable Through Title V Permit
11. {4372} Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520 (6/21/01). [District Rules 2520, 9.5.2 and 1100, 7.0] Federally Enforceable Through Title V Permit
12. {4373} If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.7] Federally Enforceable Through Title V Permit
13. {4374} It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520, 9.8.2] Federally Enforceable Through Title V Permit
14. {4375} The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.8.3] Federally Enforceable Through Title V Permit
15. {4376} The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.8.4] Federally Enforceable Through Title V Permit
16. {4377} The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520, 9.8.5] Federally Enforceable Through Title V Permit
17. {4378} The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.9] Federally Enforceable Through Title V Permit
18. {4379} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520, 9.13.2.1] Federally Enforceable Through Title V Permit
19. {4380} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.13.2.2] Federally Enforceable Through Title V Permit
20. {4381} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520, 9.13.2.3] Federally Enforceable Through Title V Permit
21. {4382} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520, 9.13.2.4] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

22. {4383} No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (02/17/05). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101, and County Rules 401 (in all eight counties in the San Joaquin Valley)] Federally Enforceable Through Title V Permit
23. {4384} No person shall manufacture, blend, repackage, supply, sell, solicit or apply any architectural coating with a VOC content in excess of the corresponding limit specified in Table of Standards 1 effective until 12/30/10 or Table of Standards 2 effective on and after 1/1/11 of District Rule 4601 (12/17/09) for use or sale within the District. [District Rule 4601, 5.1] Federally Enforceable Through Title V Permit
24. {4385} All VOC-containing materials subject to Rule 4601 (12/17/09) shall be stored in closed containers when not in use. [District Rule 4601, 5.4] Federally Enforceable Through Title V Permit
25. {4386} The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.3 (12/17/09). [District Rule 4601, 6.1 and 6.3] Federally Enforceable Through Title V Permit
26. {4387} With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.13.1 and 10.0] Federally Enforceable Through Title V Permit
27. {4388} If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR Part 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit
28. {4389} If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR Part 82, Subpart B. [40 CFR Part 82, Subpart B] Federally Enforceable Through Title V Permit
29. {4390} Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8021 and 8011] Federally Enforceable Through Title V Permit
30. {4391} Outdoor handling, storage and transport of any bulk material which emits dust shall comply with the requirements of District Rule 8031, unless specifically exempted under Section 4.0 of Rule 8031 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8031 and 8011] Federally Enforceable Through Title V Permit
31. {4392} An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8041 and 8011] Federally Enforceable Through Title V Permit
32. {4393} Whenever open areas are disturbed, or vehicles are used in open areas, the facility shall comply with the requirements of Section 5.0 of District Rule 8051, unless specifically exempted under Section 4.0 of Rule 8051 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8051 and 8011] Federally Enforceable Through Title V Permit
33. {4394} Any paved road or unpaved road shall comply with the requirements of District Rule 8061 unless specifically exempted under Section 4.0 of Rule 8061 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8061 and Rule 8011] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

34. {4395} Any unpaved vehicle/equipment area that anticipates more than 50 Average annual daily Trips (AADT) shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 150 vehicle trips per day (VDT) shall comply with the requirements of Section 5.1.2 of District Rule 8071. On each day that 25 or more VDT with 3 or more axles will occur on an unpaved vehicle/equipment traffic area, the owner/operator shall comply with the requirements of Section 5.1.3 of District Rule 8071. On each day when a special event will result in 1,000 or more vehicles that will travel/park on an unpaved area, the owner/operator shall comply with the requirements of Section 5.1.4 of District Rule 8071. All sources shall comply with the requirements of Section 5.0 of District Rule 8071 unless specifically exempted under Section 4.0 of Rule 8071 (9/16/2004) or Rule 8011 (8/19/2004). [District Rule 8071 and Rule 8011] Federally Enforceable Through Title V Permit
35. {4396} Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation). [40 CFR 61 Subpart M] Federally Enforceable Through Title V Permit
36. {4397} The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit
37. {4398} The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V Permit
38. {4399} When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit
39. {4400} Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following outdated SIP requirements: Rule 401 (Madera, Fresno, Kern, Kings, San Joaquin, Stanislaus, Tulare and Merced), Rule 110 (Fresno, Stanislaus, San Joaquin), Rule 109 (Merced), Rule 113 (Madera), Rule 111 (Kern, Tulare, Kings), and Rule 202 (Fresno, Kern, Tulare, Kings, Madera, Stanislaus, Merced, San Joaquin). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
40. {4401} Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2040 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (2/17/05); 4601 (12/17/09); 8021 (8/19/2004); 8031 (8/19/2004); 8041 (8/19/2004); 8051 (8/19/2004); 8061 (8/19/2004); and 8071 (9/16/2004). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
41. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
42. On {Month, Day, Year}, the initial Title V permit was issued. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report are based upon this initial permit issuance date, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days after the end of the reporting period. [District Rule 2520] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-3243-1-4

EXPIRATION DATE: 06/30/2012

EQUIPMENT DESCRIPTION:

CAN SIDE SEAM STRIPE COATING LINE #1 WITH A SOUDRONIC WELD BODYMAKER, MODEL FBB 5501R/5501S, AND A PERMIT-EXEMPT CURING OVEN

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. The facility-wide VOC emissions shall be less than 50,000 pounds per year. A year, for this condition, is any 12-month period based on a monthly rolling average. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Records of the cumulative facility-wide VOC emissions shall be maintained and updated monthly to demonstrate compliance with the 12 month period. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
4. The particulate filter used to control PM10 emissions from the overspray of the side seam stripe coating shall be properly maintained at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The exhaust stack which vents the emissions from the side seam stripe coating operation shall be covered by a weather hat. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The combined VOC emissions from line #1 (N-3243-1) and line #2 (N-3243-2) shall not exceed 199.0 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
7. VOC content of any coatings as applied, excluding water and exempt compounds, used for two-piece can coating operations shall not exceed any of the following limits: interior sheet basecoat and interior overvarnish: 225 g/l; exterior sheet basecoat and exterior overvarnish: 250 g/l; body spray and end coating (interior or exterior); 420 g/l, repair coating: 750 g/l; and end sealing compound: 20 g/l. [District Rule 4604, 5.1] Federally Enforceable Through Title V Permit
8. VOC content of any coatings as applied, excluding water and exempt compounds, used for three-piece can coating operations shall not exceed any of the following limits: sheet basecoat, overvarnish and end coating (interior or exterior) : 225 g/l; interior body spray: 360 g/l; exterior body spray; 420 g/l, side seam coating: 660 g/l; repair coating: 750 g/l; and end sealing compound: 20 g/l. [District Rule 4604, 5.1] Federally Enforceable Through Title V Permit
9. Solvents used for product cleaning, surface preparation or repair and maintenance cleaning shall have a VOC content not exceeding 25 g/l. [District Rule 4604, 5.4.1] Federally Enforceable Through Title V Permit
10. Solvents used for cleaning of any coating application equipment not used for sheet coating of three-piece cans shall have a VOC content not exceeding 25 g/l. [District Rule 4604, 5.4.2.2] Federally Enforceable Through Title V Permit
11. Until September 30, 2011, solvents used for cleaning coating application equipment used for sheet coating of three-piece cans shall not exceed 550 g/l. Effective on and after October 1, 2011, solvents used for cleaning coating application equipment used for sheet coating of three-piece cans shall not exceed 250 g/l. [District Rule 4604, 5.4.1] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

12. Cleaning of coating application equipment used for sheet coating of three-piece cans using solvents with a VOC content greater than 25 g/l shall be performed by one or more of the following methods: wipe cleaning; application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force; non-atomized solvent flow method in which the cleaning solvent is collected in a container or a collection system which is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container; or solvent flushing method in which the cleaning solvent is discharged into a container that is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container. The discharged solvent from the equipment must be collected into containers without atomizing into the open air. The solvent may be flushed through the system by air or hydraulic pressure, or by pumping. [District Rule 4604, 5.4.3.2] Federally Enforceable Through Title V Permit
13. All fresh or spent coatings, adhesives, catalysts, thinners and solvents shall be stored in closed containers. Solvent laden cloth or paper shall be stored and disposed in closed non-absorbent containers. [District Rule 4604, 5.5] Federally Enforceable Through Title V Permit
14. Permittee shall maintain daily records of the following: quantity and type of coatings and solvents used, mix ratios (by volume) of components added to each coating, volume of coatings applied, VOC content of each coating as applied, and VOC content of each solvent. [District Rule 4604, 6.0] Federally Enforceable Through Title V Permit
15. A list of the specific coatings, catalysts, and reducers used; the VOC content of each coating, as applied; the mix ratio of components used; and the VOC content of all cleanup and surface preparation solvents shall be maintained on the premises at all times. [District Rule 4604, 6.0] Federally Enforceable Through Title V Permit
16. Permittee shall keep the following records for solvent cleaning activities: manufacturers product data sheet or MSDS of solvents used, VOC content of solvents in g/l or lb/gal, and the type of cleaning activity for which each solvent is used. [District Rule 4604, 6.0] Federally Enforceable Through Title V Permit
17. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rule 4604, 6.0] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-3243-2-3

EXPIRATION DATE: 06/30/2012

EQUIPMENT DESCRIPTION:

CAN SIDE SEAM STRIPE COATING LINE #2 WITH A SOUDRONIC WELD BODYMAKER, MODEL FEB5501, AND A PERMIT-EXEMPT CURING OVEN

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. The facility-wide VOC emissions shall be less than 50,000 pounds per year. A year, for this condition, is any 12-month period based on a monthly rolling average. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Records of the cumulative facility-wide VOC emissions shall be maintained and updated monthly to demonstrate compliance with the 12 month period. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
4. The particulate filter used to control PM10 emissions from the overspray of the side seam stripe coating shall be properly maintained at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The exhaust stack which vents the emissions from the side seam stripe coating operation shall be covered by a weather hat. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The combined VOC emissions from line #1 (N-3243-1) and line #2 (N-3243-2) shall not exceed 199.0 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
7. VOC content of any coatings as applied, excluding water and exempt compounds, used for two-piece can coating operations shall not exceed any of the following limits: interior sheet basecoat and interior overvarnish: 225 g/l; exterior sheet basecoat and exterior overvarnish: 250 g/l; body spray and end coating (interior or exterior); 420 g/l, repair coating: 750 g/l; and end sealing compound: 20 g/l. [District Rule 4604, 5.1] Federally Enforceable Through Title V Permit
8. VOC content of any coatings as applied, excluding water and exempt compounds, used for three-piece can coating operations shall not exceed any of the following limits: sheet basecoat, overvarnish and end coating (interior or exterior) : 225 g/l; interior body spray: 360 g/l; exterior body spray; 420 g/l, side seam coating: 660 g/l; repair coating: 750 g/l; and end sealing compound: 20 g/l. [District Rule 4604, 5.1] Federally Enforceable Through Title V Permit
9. Solvents used for product cleaning, surface preparation or repair and maintenance cleaning shall have a VOC content not exceeding 25 g/l. [District Rule 4604, 5.4.1] Federally Enforceable Through Title V Permit
10. Solvents used for cleaning of any coating application equipment not used for sheet coating of three-piece cans shall have a VOC content not exceeding 25 g/l. [District Rule 4604, 5.4.2.2] Federally Enforceable Through Title V Permit
11. Until September 30, 2011, solvents used for cleaning coating application equipment used for sheet coating of three-piece cans shall not exceed 550 g/l. Effective on and after October 1, 2011, solvents used for cleaning coating application equipment used for sheet coating of three-piece cans shall not exceed 250 g/l. [District Rule 4604, 5.4.1] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

12. Cleaning of coating application equipment used for sheet coating of three-piece cans using solvents with a VOC content greater than 25 g/l shall be performed by one or more of the following methods: wipe cleaning; application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force; non-atomized solvent flow method in which the cleaning solvent is collected in a container or a collection system which is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container; or solvent flushing method in which the cleaning solvent is discharged into a container that is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container. The discharged solvent from the equipment must be collected into containers without atomizing into the open air. The solvent may be flushed through the system by air or hydraulic pressure, or by pumping. [District Rule 4604, 5.4.3.2] Federally Enforceable Through Title V Permit
13. All fresh or spent coatings, adhesives, catalysts, thinners and solvents shall be stored in closed containers. Solvent laden cloth or paper shall be stored and disposed in closed non-absorbent containers. [District Rule 4604, 5.5] Federally Enforceable Through Title V Permit
14. Permittee shall maintain daily records of the following: quantity and type of coatings and solvents used, mix ratios (by volume) of components added to each coating, volume of coatings applied, VOC content of each coating as applied, and VOC content of each solvent. [District Rule 4604, 6.0] Federally Enforceable Through Title V Permit
15. A list of the specific coatings, catalysts, and reducers used; the VOC content of each coating, as applied; the mix ratio of components used; and the VOC content of all cleanup and surface preparation solvents shall be maintained on the premises at all times. [District Rule 4604, 6.0] Federally Enforceable Through Title V Permit
16. Permittee shall keep the following records for solvent cleaning activities: manufacturers product data sheet or MSDS of solvents used, VOC content of solvents in g/l or lb/gal, and the type of cleaning activity for which each solvent is used. [District Rule 4604, 6.0] Federally Enforceable Through Title V Permit
17. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rule 4604, 6.0] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

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Attachment A

Detailed Facility Printout

Detailed Facility Report

For Facility=3243

Sorted by Facility Name and Permit Number

SILGAN CONTAINERS MFR. CORP. 4000 YOSEMITE BLVD MODESTO, CA 95367-7798	FAC # STATUS: TELEPHONE:	N 3243 A 2095216469	TYPE: TOXIC ID:	TitleV 51175	EXPIRE ON: AREA: INSP. DATE:	06/30/2012 10 / 06/11
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PERMIT NUMBER	FEE DESCRIPTION	FEE RULE	QTY	FEE AMOUNT	FEE TOTAL	PERMIT STATUS	EQUIPMENT DESCRIPTION
N-3243-1-3	112 hp	3020-01 D	1	314.00	314.00	A	CAN SIDE SEAM STRIPE COATING LINE #1 WITH A SOUDRONIC WELD BODYMAKER, MODEL FBB 5501R/5501S, AND A PERMIT-EXEMPT CURING OVEN
N-3243-2-2	112 hp	3020-01 D	1	314.00	314.00	A	CAN SIDE SEAM STRIPE COATING LINE #2 WITH A SOUDRONIC WELD BODYMAKER, MODEL FEB5501, AND A PERMIT-EXEMPT CURING OVEN

Number of Facilities Reported: 1

Attachment B

Exempt Equipment

Silgan Containers Mfg. Corp., Modesto Riverside

**San Joaquin Valley
Unified Air Pollution Control District
Title V Application - INSIGNIFICANT ACTIVITIES**

COMPANY NAME: SILGAN CONTAINERS MFG. CORP.			FACILITY ID: N-3243		
Check the box next to the exemption category from Rule 2020 which describes any insignificant activity or equipment at your facility not requiring a permit.					
Exemption Category	Rule 2020 Citation	√	Exemption Category	Rule 2020 Citation	√
Structure or incinerator assoc. with a structure designed as a dwelling for 4 families or less	4.1		Containers used to store refined lubricating oils	6.6.8	x
Locomotives, airplanes, and watercraft used to transport passengers or freight	4.4		Unvented pressure vessels used exclusively to store liquified gases or assoc with exempt equipment	6.6.9 or 6.13	x
Natural gas or LPG-fired boilers or other indirect heat transfer units of 5 MMBtu/hr or less	6.1.1		Portable tanks used exclusively to store produced fluids for ≤ six months	6.6.10	
Piston-type i.c engine with maximum continuous rating of 50 braking horsepower (bhp) or less	6.1.2		Mobile transport tanks on delivery vehicles of VOCs	6.6.11	
Gas turbine engines with maximum heat input rating of 3 MMBtu/hr or less	6.1.3		Loading racks used for the transfer of less than 4,000 gal/day of unheated organic material with initial boiling point ≥ 302 F or of fuel oil with specific gravity ≥0.8251	6.7.1.1	
Space heating equipment other than boilers	6.1.4	x	Loading racks used for the transfer of asphalt, crude or residual oil stored in exempt tanks, or crude oil with specific gravity ≥ 0.8762	6.7.1.2	
Cooling towers with a circulation rate less than 10,000 gal/min, and that are not used for cooling of process water, or water from barometric jets or condensers++	6.2	x	Equipment used exclusively for the transfer of refined lubricating oil	6.7.2	
Use of less than 2 gal/day of graphic arts materials	6.3		Equipment used to apply architectural coatings	6.8.1	
Equipment at retail establishments used to prepare food for human consumption	6.4.1		Unheated, non-conveyorized cleaning equipment with < 10 ft ² open area; using solvents with initial boiling point ≥ 248 F; and < 25 gal/yr. evaporative losses	6.9	
Ovens at bakeries with total daily production less than 1,000 pounds and exempt by sec. 6.1.1	6.4.3		Brazing, soldering, or welding equipment	6.10	x
Equipment used exclusively for extruding or compression molding of rubber or plastics, where no plastisizer or blowing agent is used	6.5		Equipment used to compress natural gas	6.11	
Containers used to store clean produced water	6.6.1		Fugitive emissions sources assoc. with exempt equipment	6.12	x
Containers ≤100 bbl used to store oil with specific gravity ≥ 0.8762	6.6.2		Pits and Ponds as defined in Rule 1020	6.15	
Containers ≤ 100 bbl installed prior to 6/1/89 used to store oil with specific gravity ≥ 0.8762	6.6.3		On-site roadmix manufacturing and the application of roadmix as a road base material	6.17	
Containers with a capacity ≤ 250 gallons used to store organic material where the actual storage temperature <150 F	6.6.4	x	Emissions less than 2 lb/day from units not included above	6.19	x
Containers used to store unheated organic material with an initial boiling point ≥ 302 F	6.6.5		Venting PUC quality natural gas from for sole purpose of pipeline and compressor repair and or maintenance	7.2	
Containers used to store fuel oils or non-air-blown asphalt with specific gravity ≥0.9042	6.6.6		Non-structural repairs & maintenance to permitted equipment	7.3	
Containers used to store petroleum distillates used as motor fuel with specific gravity ≥ 0.8251	6.6.7		Detonation of explosives ≤ 100 lb/day and 1,000 lb/year	7.4	

Attachment C

Current SJVUAPCD Permits

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-3243-1-3

EXPIRATION DATE: 06/30/2012

EQUIPMENT DESCRIPTION:

CAN SIDE SEAM STRIPE COATING LINE #1 WITH A SOUDRONIC WELD BODYMAKER, MODEL FBB 5501R/5501S, AND A PERMIT-EXEMPT CURING OVEN

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
3. The facility-wide VOC emissions shall be less than 50,000 pounds per year. A year, for this condition, is any 12-month period based on a monthly rolling average. [District Rule 2201]
4. Records of the cumulative facility-wide VOC emissions shall be maintained and updated monthly to demonstrate compliance with the 12 month period. [District Rule 1070]
5. The particulate filter used to control PM10 emissions from the overspray of the side seam stripe coating shall be properly maintained at all times. [District Rule 2201]
6. The exhaust stack which vents the emissions from the side seam stripe coating operation shall be covered by a weather hat. [District Rule 2201]
7. The combined VOC emissions from line #1 (N-3243-1) and line #2 (N-3243-2) shall not exceed 199.0 pounds in any one day. [District Rule 2201]
8. VOC content of any coatings as applied, excluding water and exempt compounds, used for can coating lines shall not exceed any of the following limits: sheet basecoat (exterior and interior) and overvarnish: 225 g/l; two-piece can exterior basecoat and overvarnish: 250 g/l; interior and exterior body spray, interior or exterior end spray or rollcoat: 510 g/l; three-piece can side seam spray: 660 g/l; and end sealing compound: 440 g/l. [District Rule 4604]
9. All fresh or spent coatings, adhesives, catalysts, thinners and solvents shall be stored in closed containers. Solvent laden cloth or paper shall be stored and disposed in closed non-absorbent containers. [District Rule 4604]
10. Cleaning activities that use solvents with a VOC content greater than 50 g/l (0.42 lb/gallon) shall be performed by one or more of the following methods: wipe cleaning; application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force; non-atomized solvent flow method in which the cleaning solvent is collected in a container or a collection system which is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container; or solvent flushing method in which the cleaning solvent is discharged into a container that is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container. The discharged solvent from the equipment must be collected into containers without atomizing into the open air. The solvent may be flushed through the system by air or hydraulic pressure, or by pumping. [District Rule 4604]
11. Permittee shall not use materials with a VOC content greater than 50 g/l (0.42 lb/gallon) for spray equipment clean-up unless an enclosed system or equipment proven to be equally effective is used for cleaning. [District Rule 4603]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

12. VOC content of solvents used shall not exceed any of the following limits: product cleaning during manufacturing process or surface preparation for coating application: 50 g/l (0.42 lb/gal), repair and maintenance cleaning: 50 g/l (0.42 lb/gal), and cleaning of coating application equipment: 550 g/l (4.6 lb/gal). [District Rule 4604]
13. Permittee shall maintain daily records of the following: quantity and type of coatings and solvents used, mix ratios (by volume) of components added to each coating, volume of coatings applied, VOC content of each coating as applied, and VOC content of each solvent. [District Rule 4604]
14. A list of the specific coatings, catalysts, and reducers used; the VOC content of each coating, as applied; the mix ratio of components used; and the VOC content of all cleanup and surface preparation solvents shall be maintained on the premises at all times. [District Rule 4604]
15. Permittee shall keep the following records for solvent cleaning activities: manufacturers product data sheet or MSDS of solvents used, VOC content of solvents in g/l or lb/gal, and the type of cleaning activity for which each solvent is used. [District Rule 4604]
16. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rule 4604]

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-3243-2-2

EXPIRATION DATE: 06/30/2012

EQUIPMENT DESCRIPTION:

CAN SIDE SEAM STRIPE COATING LINE #2 WITH A SOUDRONIC WELD BODYMAKER, MODEL FEB5501, AND A PERMIT-EXEMPT CURING OVEN

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
3. The facility-wide VOC emissions shall be less than 50,000 pounds per year. A year, for this condition, is any 12-month period based on a monthly rolling average. [District Rule 2201]
4. Records of the cumulative facility-wide VOC emissions shall be maintained and updated monthly to demonstrate compliance with the 12 month period. [District Rule 1070]
5. The particulate filter used to control PM10 emissions from the overspray of the side seam stripe coating shall be properly maintained at all times. [District Rule 2201]
6. The exhaust stack which vents the emissions from the side seam stripe coating operation shall be covered by a weather hat. [District Rule 2201]
7. The combined VOC emissions from line #1 (N-3243-1) and line #2 (N-3243-2) shall not exceed 199.0 pounds in any one day. [District Rule 2201]
8. VOC content of any coatings as applied, excluding water and exempt compounds, used for can coating lines shall not exceed any of the following limits: sheet basecoat (exterior and interior) and overvarnish: 225 g/l; two-piece can exterior basecoat and overvarnish: 250 g/l; interior and exterior body spray, interior or exterior end spray or rollcoat: 510 g/l; three-piece can side seam spray: 660 g/l; and end sealing compound: 440 g/l. [District Rule 4604]
9. All fresh or spent coatings, adhesives, catalysts, thinners and solvents shall be stored in closed containers. Solvent laden cloth or paper shall be stored and disposed in closed non-absorbent containers. [District Rule 4604]
10. Cleaning activities that use solvents with a VOC content greater than 50 g/l (0.42 lb/gallon) shall be performed by one or more of the following methods: wipe cleaning; application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force; non-atomized solvent flow method in which the cleaning solvent is collected in a container or a collection system which is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container; or solvent flushing method in which the cleaning solvent is discharged into a container that is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container. The discharged solvent from the equipment must be collected into containers without atomizing into the open air. The solvent may be flushed through the system by air or hydraulic pressure, or by pumping. [District Rule 4604]
11. Permittee shall not use materials with a VOC content greater than 50 g/l (0.42 lb/gallon) for spray equipment clean-up unless an enclosed system or equipment proven to be equally effective is used for cleaning. [District Rule 4603]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

12. VOC content of solvents used shall not exceed any of the following limits: product cleaning during manufacturing process or surface preparation for coating application: 50 g/l (0.42 lb/gal), repair and maintenance cleaning: 50 g/l (0.42 lb/gal), and cleaning of coating application equipment: 550 g/l (4.6 lb/gal). [District Rule 4604]
13. Permittee shall maintain daily records of the following: quantity and type of coatings and solvents used, mix ratios (by volume) of components added to each coating, volume of coatings applied, VOC content of each coating as applied, and VOC content of each solvent. [District Rule 4604]
14. A list of the specific coatings, catalysts, and reducers used; the VOC content of each coating, as applied; the mix ratio of components used; and the VOC content of all cleanup and surface preparation solvents shall be maintained on the premises at all times. [District Rule 4604]
15. Permittee shall keep the following records for solvent cleaning activities: manufacturers product data sheet or MSDS of solvents used, VOC content of solvents in g/l or lb/gal, and the type of cleaning activity for which each solvent is used. [District Rule 4604]
16. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rule 4604]

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Attachment D

Source Test Results

TABLE #1
TOTAL PARTICULATE RESULTS

Silgan - Riverbank
 Sealer

RUN #	1	2	3	AVERAGE
Test Date	7/27/99	7/27/99	7/27/99	
Test Time	1221-1321	1343-1443	1501-1601	
Production Rate, cans/hour	30,000	30,000	31,000	30,333
Sample Volume. (DSCF)	46.519	37.049	37.966	40.511
Isokinetic. (%)	98.2	98.0	98.4	98.2
Duct Temp., (°F)	102.0	102.0	104.3	102.8
Velocity. (ft/sec)	33.74	33.80	34.70	34.1
Flow Rate. (ACFM)	397	398	409	401
Flow Rate. (DSCFM)	368	369	377	371
H ₂ O. (volume %)	1.28	1.24	1.33	1.3
O ₂ (volume %)	20.95	20.95	20.95	20.95
CO ₂ (volume %)	0.04	0.04	0.04	0.04
F.H. Particulate Concentration (gr/DSCF)	0.0019	0.0020	0.0023	0.0021
F.H. Particulate Emission Rate (lbs/hr)	0.006	0.006	0.007	0.007
B.H. Particulate Concentration (gr/DSCF)	0.0004	0.0000	0.0002	0.0002
B.H. Particulate Emission Rate (lbs/hr)	0.001	0.000	0.001	0.001
Total Particulate Concentration (gr/DSCF)	0.0019	0.0020	0.0025	0.0022
Total Particulate Emissions (lbs/hr)	0.007	0.006	0.008	0.007

WHERE

- DSCF = Sample Volume in Dry Standard Cubic Feet
- DSCFM = Dry Standard Cubic Feet per Minute
- ACFM = Actual Cubic Feet per Minute
- H₂O. volume % = Stack gas percent water vapor
- gr/DSCF = Particulate concentration in grains per DSCF
- Vmstd = Sample Volume (DSCF)
- lbs/hr = pounds per hour
- F.H. = Front Half (filterable)
- B.H. = Back Half (organic + inorganic)

CALCULATIONS

gr/DSCF = mg/Vmstd x 0.01543
 Emission Rate, lbs/hr = 0.00857 * gr/DSCF * DSCFM