



SEP 27 2012

Ferrell Smith
Greif Industrial Packaging & Services LLC
P O Box 2146
Merced, CA 95344

**Re: Notice of Preliminary Decision - Federally Mandated Operating Permit
District Facility # N-1330
Project # N-1111167**

Dear Mr. Smith:

Enclosed for your review and comment is the District's analysis of Greif Industrial Packaging & Services LLC's application for the Federally Mandated Operating Permit for its drum container manufacturing operation 2400 Cooper Avenue in Merced, 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: Vanesa Gonzalez, 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

Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: 661-392-5500 FAX: 661-392-5585



SEP 27 2012

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-1330
Project # N-1111167**

Dear Mr. Rios:

Enclosed for your review and comment is the District's analysis of Greif Industrial Packaging & Services LLC's application for the Federally Mandated Operating Permit for its drum container manufacturing operation 2400 Cooper Avenue in Merced, 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: Vanesa Gonzalez, Permit Services Engineer

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SEP 27 2012

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-1330
Project # N-111167**

Dear Mr. Tollstrup:

Enclosed for your review and comment is the District's analysis of Greif Industrial Packaging & Services LLC's application for the Federally Mandated Operating Permit for its drum container manufacturing operation 2400 Cooper Avenue in Merced, 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: Vanesa Gonzalez, Permit Services Engineer

Attachments

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Merced Sun Star

**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 Greif Industrial Packaging & Services LLC for its drum container manufacturing operation 2400 Cooper Avenue in Merced, California.

The District's analysis of the legal and factual basis for this proposed action, project #N-1111167, 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

Greif Industrial Packaging & Service LLC

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TITLE V APPLICATION REVIEW

Project #: N-1111167
Deemed Complete: May 11, 2011

Engineer: Vanesa Gonzalez
Date: September 25, 2012

Facility Number: N-1330
Facility Name: Greif Industrial Packaging & Services LLC
Mailing Address: P O Box 2146
Merced, Ca 95344

Contact Name: Farrell Smith
Phone: (209) 383-4396

Responsible Official: Farrell Smith
Title: (209) 383-4396

I. PROPOSAL

Greif Industrial Packaging & Services LLC Is proposing that an initial Title V permit be issued for its existing drum manufacturing facility in Merced, 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

Greif Industrial Packaging & Services LLC Is located at 2400 Cooper Ave., in Merced, 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:

Template SJV-UM-0-3 Facility Wide Umbrella:

The applicant has requested to utilize template No. SJV-UM-0-3, Facility Wide Umbrella. Based on the information submitted in 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 2 through 42 of the proposed requirements for unit N-1330-0-1.

VI. APPLICABLE REQUIREMENTS ADDRESSED BY GENERAL PERMIT TEMPLATES

- District Rule 1100, Equipment Breakdown (amended December 17, 1992)
- District Rule 1160, Emission Statements (adopted November 18, 1992)
- District Rule 2010, Permits Required (amended December 17, 1992)
- District Rule 2020, Exemptions (amended August 18, 2011)¹
- District Rule 2031, Transfer of Permits (amended December 17, 1992)
- District Rule 2040, Applications (amended December 17, 1992)

¹ The amendments made to this rule on August 18, 2011 have no impact to this source; therefore template SJV-UM-0-3 is still valid for this project.

- District Rule 2070, Standards for Granting Applications (amended December 17, 1992)
- District Rule 2080, Conditional Approval (amended December 17, 1992)
- District Rule 2520, Federally Mandated Operating Permits (amended June 21, 2001)
- District Rule 4101, Visible Emissions (amended November 15, 2001)
- District Rule 4601, Architectural Coatings (amended December 17, 2009)
- District Rule 8011, General Requirements (amended August 19, 2004)
- District Rule 8021, Construction, Demolition, Excavation, Extraction, 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 61, Subpart M, National Emission Standard for Asbestos
- 40 CFR Part 82, Subpart F, Stratospheric Ozone

VII. APPLICABLE REQUIREMENTS NOT ADDRESSED BY GENERAL PERMIT TEMPLATES

- District Rule 1070, Inspections (amended December 17, 1992)
- District Rule 1081, Source Sampling (amended December 17, 1992)
- District Rule 2080, Conditional Approval (amended December 17, 1992)
- District Rule 2520, Federally Mandated Operating Permits (amended June 21, 2001)

- District Rule 4201, Particulate Matter Concentration (amended December 17, 1992)
- District Rule 4301, Fuel Burning Equipment (amended December 17, 1992)
- District Rule 4305 – Boilers, Steam Generators, and Process Heaters – Phase 2 (amended August 21, 2003)
- District Rule 4306, Boilers, Steam Generators, and Process Heaters – Phase 3 (amended October 16, 2008)
- District Rule 4320, Advanced Emission Reduction Options for Boilers, Steam Generators, and Process Heaters Greater Than 5.0 MMBtu/hr (amended October 16, 2008)
- District Rule 4604, Can and Coil Coating Operation (amended September 20, 2007)
- District Rule 4801, Sulfur Compounds (amended December 17, 1992)

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 1 of the requirements for permit unit N-1330-0-1 are based on the rules listed above and are 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 2 through 42 to assure compliance with these requirements.

B. Requirements Not Addressed by Model General Permit Templates

1. District Rule 1070 – Inspections

The purpose of this rule is to explain the District's authority in determining compliance with the requirements of these rules and regulations. This rule shall apply to any source operation which emits or may emit air contaminants.

a. N-1330-2-2: CAN AND COIL COATING OPERATION CONSISTING OF A HEAD AND BOTTOM PART INTERIOR COATING BOOTH

Condition 17 of the proposed permit requirements ensures compliance with this rule.

b. N-1330-3-1: CAN AND COIL COATING OPERATION CONSISTING OF A BINKS EXTERIOR BODY BOOTH

Condition 12 of the proposed permit requirements ensures compliance with this rule.

c. N-1330-4-1: CAN AND COIL COATING OPERATION CONSISTING OF CENTRIFUGAL COATER (#2) AND RHEEM DESIGN BOOTH

Condition 12 of the proposed permit requirements ensures compliance with this rule.

d. N-1330-5-1: CAN AND COIL COATING OPERATION CONSISTING OF CENTRIFUGAL COATER (#1)

Condition 12 of the proposed permit requirements ensures compliance with this rule.

e. N-1330-6-2: CAN AND COIL COATING OPERATION CONSISTING OF AN EXTERIOR HEAD PARTS COATING BOOTH

Condition 17 of the proposed permit requirements ensures compliance with this rule.

- f. N-1330-7-5: SHEET ROLL COATER SYSTEM CONSISTING OF A WAGNER ROLL COAT MACHINE WITH A VOC CAPTURE ENCLOSURE AND A 12.5 MMBTU/HR WAGNER PAINT CURING OVEN WITH A 2.6 MMBTU/HR JO ROSS ENGINEERING DIRECT FLAME AFTERBURNER

Condition 38 of the proposed permit requirements ensures compliance with this rule.

- g. N-1330-15-2: 8.4 MMBTU/HR HURST MODEL S4-200-150 BOILER WITH AN INDUSTRIAL COMBUSTION LOW NOX BURNER AND INDUCED FLUE GAS RECIRCULATION

Condition 26 of the proposed permit requirements ensures compliance with this rule.

2. District Rule 1081 – Source Sampling

The purpose of this rule is to ensure that any source operation which emits or may emit air contaminants provides adequate and safe facilities for use in sampling to determine compliance. This rule also specifies methods and procedures for source testing, sample collection, and compliance determination.

The provisions of this rule shall apply to any source operation which emits or may emit air contaminants.

- a. N-1330-7-5: SHEET ROLL COATER SYSTEM CONSISTING OF A WAGNER ROLL COAT MACHINE WITH A VOC CAPTURE ENCLOSURE AND A 12.5 MMBTU/HR WAGNER PAINT CURING OVEN WITH A 2.6 MMBTU/HR JO ROSS ENGINEERING DIRECT FLAME AFTERBURNER

Conditions 28 and 29 of the proposed permit requirements ensure compliance with this rule.

- b. N-1330-15-2: 8.4 MMBTU/HR HURST MODEL S4-200-150 BOILER WITH AN INDUSTRIAL COMBUSTION LOW NOX BURNER AND INDUCED FLUE GAS RECIRCULATION

Conditions 18 and 23 of the proposed permit requirements ensure compliance with this rule.

2. District Rule 2080 – Conditional Approval

The purpose of this rule is to grant authority to the APCO to issue or revise specific written conditions on an Authority to Construct or a Permit to Operate to assure compliance with air contaminant emission standards or limitations.

a. N-1330-8-1: 5 MMBTU/HR WICKET OVEN SERVED BY A FUME INCINERATOR

Conditions 1, 2, and 3 of the proposed permit requirements ensure compliance with this rule.

b. N-1330-9-1: 5.1 MMBTU/HR DEVILBISS PAINT BAKE OVEN SERVED BY A FUME INCINERATOR

Conditions 1, 2, and 3 of the proposed permit requirements ensure compliance with this rule.

c. N-1330-10-1: 3.9 MMBTU/HR BLU SURF PAINT BAKE OVEN SERVED BY A FUME INCINERATOR

Conditions 1, 2, and 3 of the proposed permit requirements ensure compliance with this rule.

d. N-1330-12-1: ELECTRO PLATING OPERATION SERVED BY A FUME SCRUBBER

Conditions 1 and 2 of the proposed permit requirements ensure compliance with this rule.

3. District Rule 2201 - New and Modified Stationary Source Review Rule

The permit units are subject to the District Rule 2201 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.

a. N-1330-2-2: CAN AND COIL COATING OPERATION CONSISTING OF A HEAD AND BOTTOM PART INTERIOR COATING BOOTH

- Condition 1 of the current PTO has been included as condition 1 of the proposed facility-wide requirements N-1330-0-1.
- Conditions 2 and 3 of the current PTO have been included as conditions 1 and 2 of the proposed permit unit requirements.

- Condition 4 of the current PTO has been expanded to state specific rule requirements and is included as conditions 6 through 17 of proposed permit requirements.
- Conditions 5 and 6 of the current PTO are incorporated into condition 11 of the proposed permit requirements.
- Condition 7 of the current PTO is included as condition 3 of the proposed permit requirements.
- Condition 8 of the current PTO has been expanded to state specific rule requirements and is included as condition 6 of the proposed permit requirements.
- Conditions 9 and 10 of the current PTO are included as conditions 4 and 5 of the proposed permit requirements.
- Condition 11 of the current PTO has been expanded to state specific rule requirements and included as conditions 13 through 16 of the proposed permit requirements.
- Condition 12 of the current PTO has been included as condition 17 of the proposed permit requirements.

b. N-1330-3-1: CAN AND COIL COATING OPERATION CONSISTING OF A BINKS EXTERIOR BODY BOOTH

- Condition 1 of the current PTO has been included as condition 1 of the proposed facility-wide requirements N-1330-0-1.
- Condition 2 of the current PTO has been included as condition 23 of the proposed facility-wide requirements N-1330-0-1.
- Condition 3 of the current PTO has been expanded to state specific rule requirements and is included as conditions 1 through 12 of proposed permit requirements.
- Condition 4 of the current PTO has been expanded to state specific rule requirements and is included as conditions 8 through 11 of the proposed permit requirements.
- Condition 5 of the current PTO has been included as condition 12 of the proposed permit requirements.

c. N-1330-4-1: CAN AND COIL COATING OPERATION CONSISTING OF CENTRIFUGAL COATER (#2) AND RHEEM DESIGN BOOTH

- Condition 1 of the current PTO has been included as condition 1 of the proposed facility-wide requirements N-1330-0-1.
- Condition 2 of the current PTO has been included as condition 23 of the proposed facility-wide requirements N-1330-0-1.
- Condition 3 of the current PTO has been expanded to state specific rule requirements and is included as conditions 1 through 12 of proposed permit requirements.

- Condition 4 of the current PTO has been expanded to state specific rule requirements and is included as conditions 8 through 11 of the proposed permit requirements.
 - Condition 5 of the current PTO has been included as condition 12 of the proposed permit requirements.
- d. N-1330-5-1: CAN AND COIL COATING OPERATION CONSISTING OF CENTRIFUGAL COATER (#1)
- Condition 1 of the current PTO has been included as condition 1 of the proposed facility-wide requirements N-1330-0-1.
 - Condition 2 of the current PTO has been included as condition 23 of the proposed facility-wide requirements N-1330-0-1.
 - Condition 3 of the current PTO has been expanded to state specific rule requirements and is included as conditions 1 through 12 of proposed permit requirements.
 - Condition 4 of the current PTO has been expanded to state specific rule requirements and is included as conditions 8 through 11 of the proposed permit requirements.
 - Condition 5 of the current PTO has been included as condition 12 of the proposed permit requirements.
- e. N-1330-6-2: CAN AND COIL COATING OPERATION CONSISTING OF AN EXTERIOR HEAD PARTS COATING BOOTH
- Condition 1 of the current PTO has been included as condition 1 of the proposed facility-wide requirements N-1330-0-1.
 - Conditions 2 and 3 of the current PTO have been included as conditions 1 and 2 of the proposed permit unit requirements.
 - Condition 4 of the current PTO has been expanded to state specific rule requirements and is included as conditions 6 through 17 of proposed permit requirements.
 - Conditions 5 and 6 of the current PTO are incorporated into condition 11 of the proposed permit requirements.
 - Condition 7 of the current PTO has been expanded to state specific rule requirements and is included as condition 6 of the proposed permit requirements.
 - Condition 8 of the current PTO is included as condition 3 of the proposed permit requirements.
 - Conditions 9 and 10 of the current PTO are included as conditions 4 and 5 of the proposed permit requirements.
 - Condition 11 of the current PTO has been expanded to state specific rule requirements and included as conditions 13 through 16 of the proposed permit requirements.
 - Condition 12 of the current PTO has been included as condition 17 of the proposed permit requirements.

f. N-1330-7-5: SHEET ROLL COATER SYSTEM CONSISTING OF A WAGNER ROLL COAT MACHINE WITH A VOC CAPTURE ENCLOSURE AND A 12.5 MMBTU/HR WAGNER PAINT CURING OVEN WITH A 2.6 MMBTU/HR JO ROSS ENGINEERING DIRECT FLAME AFTERBURNER

- Condition 1 of the current PTO has been included as condition 1 of the proposed facility-wide requirements N-1330-0-1.
- Conditions 2 through 4 of the current PTO have included as conditions 1 through 3 of the proposed permit requirements.
- Condition 5 of the current PTO has been expanded to state specific rule requirements and included as conditions 14 through 35 of the proposed permit requirements.
- Condition 6 of the current PTO has been incorporated into condition 19 of the proposed permit requirements.
- Conditions 7 and 8 of the current PTO are included as conditions 4 and 5 of the proposed permit requirements.
- Condition 9 of the current PTO has been incorporated into condition 14 of the proposed permit requirements.
- Condition 10 of the current PTO has been included as condition 23 of the proposed facility-wide requirements N-1330-0-1.
- Conditions 11 through 18 of the current PTO have been included as conditions 6 through 13 of the proposed permit requirements.
- Condition 19 of the current PTO has been incorporated into condition 26 of the proposed permit requirements.
- Conditions 20 and 21 of the current PTO have been included as conditions 28 and 29 of the proposed permit requirements.
- Condition 22 of the current PTO has been incorporated into conditions 30 and 31 of the proposed permit requirements.
- Condition 23 of the current PTO has been expanded to state specific rule requirements and included as conditions 36 through 39 of the proposed permit requirements.
- Condition 24 of the current PTO has been incorporated into condition 35 of the proposed permit requirements.
- Condition 25 of the current PTO has been incorporated into condition 38 of the proposed permit requirements.

g. N-1330-8-1: 5 MMBTU/HR WICKET OVEN SERVED BY A FUME INCINERATOR

- Condition 1 of the current PTO has been included as condition 1 of the proposed facility-wide requirements N-1330-0-1.

- Conditions 2 through 4 have been included as conditions 1 through 3 of the proposed permit requirements.
- Condition 5 of the current PTO has been included as condition 23 of the proposed facility-wide requirements N-1330-0-1.
- Condition 6 has been included as condition 4 of the proposed permit requirements.

h. N-1330-9-1: 5.1 MMBTU/HR DEVILBISS PAINT BAKE OVEN SERVED BY A FUME INCINERATOR

- Condition 1 of the current PTO has been included as condition 1 of the proposed facility-wide requirements N-1330-0-1.
- Conditions 2 through 4 have been included as conditions 1 through 3 of the proposed permit requirements.
- Condition 5 of the current PTO has been included as condition 23 of the proposed facility-wide requirements N-1330-0-1.
- Condition 6 has been included as condition 4 of the proposed permit requirements.

i. N-1330-10-1: 3.9 MMBTU/HR BLU SURF PAINT BAKE OVEN SERVED BY A FUME INCINERATOR

- Condition 1 of the current PTO has been included as condition 1 of the proposed facility-wide requirements N-1330-0-1.
- Conditions 2 through 4 have been included as conditions 1 through 3 of the proposed permit requirements.
- Condition 5 of the current PTO has been included as condition 23 of the proposed facility-wide requirements N-1330-0-1.
- Condition 6 has been included as condition 4 of the proposed permit requirements.

j. N-1330-12-1: ELECTRO PLATING OPERATION SERVED BY A FUME SCRUBBER

- Condition 1 of the current PTO has been included as condition 1 of the proposed facility-wide requirements N-1330-0-1.
- Conditions 2 and 3 have been included as conditions 1 and 2 of the proposed permit requirements.

k. N-1330-15-2: 8.4 MMBTU/HR HURST MODEL S4-200-150 BOILER WITH AN INDUSTRIAL COMBUSTION LOW NOX BURNER AND INDUCED FLUE GAS RECIRCULATION

- Condition 1 of the current PTO has been included as condition 1 of the proposed permit requirements.

- Condition 2 of the current PTO has been included as condition 1 of the proposed facility-wide requirements N-1330-0-1.
- Condition 3 of the current PTO has been included as condition 23 of the proposed facility-wide requirements N-1330-0-1.
- Conditions 4 through 28 of the current PTO have been included as conditions 2 through 26

5. 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.

6. 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. This rule shall apply to any source operation which emits or may emit dust, fumes, or total suspended particulate matter.

Per Section 3.0, a person shall not release or discharge into the atmosphere from any single source operation, dust, fumes, or total suspended particulate matter emissions in excess of 0.1 grain per cubic foot of gas at dry standard conditions, as determined by the test methods in section 4.0.

a. N-1330-2-2: CAN AND COIL COATING OPERATION CONSISTING OF A HEAD AND BOTTOM PART INTERIOR COATING BOOTH

Condition 3 of the proposed permit requirements ensures compliance with this rule.

e. N-1330-6-2: CAN AND COIL COATING OPERATION CONSISTING OF AN EXTERIOR HEAD PARTS COATING BOOTH

Condition 3 of the proposed permit requirements ensures compliance with this rule.

c. N-1330-8-1: 5 MMBTU/HR WICKET OVEN SERVED BY A FUME INCINERATOR

Condition 4 of the proposed permit requirements ensures compliance with this rule.

d. N-1330-9-1: 5.1 MMBTU/HR DEVILBISS PAINT BAKE OVEN SERVED BY A FUME INCINERATOR

Condition 4 of the proposed permit requirements ensures compliance with this rule.

e. N-1330-10-1: 3.9 MMBTU/HR BLU SURF PAINT BAKE OVEN SERVED BY A FUME INCINERATOR

Condition 4 of the proposed permit requirements ensures compliance with this rule.

f. N-1330-15-2: 8.4 MMBTU/HR HURST MODEL S4-200-150 BOILER WITH AN INDUSTRIAL COMBUSTION LOW NOX BURNER AND INDUCED FLUE GAS RECIRCULATION

Condition 2 of the proposed permit requirements ensures compliance with this rule.

7. District Rule 4301 – Fuel Burning Equipment

The purpose of this rule is to limit the emission of air contaminants from fuel burning equipment. This rule limits the concentration of combustion contaminants and specifies maximum emission rates for sulfur dioxide, nitrogen oxide and combustion contaminant emissions. The provisions of this rule shall apply to any fuel burning equipment except air pollution control equipment which is exempted according to Section 4.0.

Per 5.1, a person shall not discharge into the atmosphere combustion contaminants exceeding in concentration at the point of discharge, 0.1 grain per cubic foot of gas calculated to 12% of carbon dioxide at dry standard conditions.

Per 5.2, a person shall not build, erect, install or expand any non-mobile fuel burning equipment unit unless the discharge into the atmosphere of contaminants will not and does not exceed any one (1) or more of the following rates:

- 200 pounds per hour of sulfur compounds, calculated as sulfur dioxide (SO₂);
- 140 pounds per hour of nitrogen oxides, calculated as nitrogen dioxide (NO₂);
- Ten (10) pounds per hour of combustion contaminants as defined in Rule 1020 (Definitions) and derived from the fuel.

Per 5.3, nothing in this rule shall be construed as preventing the maintenance or preventing the alteration or modification of an existing fuel burning equipment unit which will reduce its mass rate of air contaminant emissions.

a. N-1330-7-5: SHEET ROLL COATER SYSTEM CONSISTING OF A WAGNER ROLL COAT MACHINE WITH A VOC CAPTURE ENCLOSURE AND A 12.5 MMBTU/HR WAGNER PAINT CURING OVEN

WITH A 2.6 MMBTU/HR JO ROSS ENGINEERING DIRECT FLAME
AFTERBURNER

Condition 6 of the proposed permit requirements ensures compliance with this section.

- b. N-1330-15-2: 8.4 MMBTU/HR HURST MODEL S4-200-150 BOILER
WITH AN INDUSTRIAL COMBUSTION LOW NOX BURNER AND
INDUCED FLUE GAS RECIRCULATION

Condition 7 of the proposed permit requirements ensures compliance with this section.

8. District Rule 4305 – Boilers, Steam Generators, and Process Heaters – Phase 2

The purpose of this rule is to limit emissions of oxides of nitrogen (NO_x) and carbon monoxide (CO) from any gaseous fuel or liquid fuel fired boilers, steam generators, and process heaters with a rated heat input greater than 5 million Btu per hour. The rule was amended in August 21, 2003.

The following permit requirements ensure compliance with this rule:

- a. N-1330-15-2: 8.4 MMBTU/HR HURST MODEL S4-200-150 BOILER
WITH AN INDUSTRIAL COMBUSTION LOW NOX BURNER AND
INDUCED FLUE GAS RECIRCULATION

Conditions 4, 5, 7-12, 15-17, 19-22, 25, and 26 of the proposed permit requirements ensure compliance with this section.

9. District Rule 4306 – Boilers, Steam Generators, and Process Heaters – Phase 3

This rule applies to any boiler, steam generator or process heater, with a rated heat input greater than 5 million Btu per hour.

Section 5.1 requires that NO_x and CO emissions shall not exceed the limits specified in Table 1. For steam generators limited to an annual heat input between 9 billion BTU and 30 billion BTU (Table 1 Category H), NO_x and CO emissions shall not exceed 30 ppmv and 400 ppmv, respectively.

- a. N-1330-15-2: 8.4 MMBTU/HR HURST MODEL S4-200-150 BOILER
WITH AN INDUSTRIAL COMBUSTION LOW NOX BURNER AND
INDUCED FLUE GAS RECIRCULATION

Conditions 5 and 7 of the proposed permit requirements ensure compliance with this section.

Section 5.2, applies to units limited to less than 9 billion Btu per calendar year heat input. Since this facility has no units limited to 9 billion Btu per calendar year this section does not apply and will not be discussed any further.

Section 5.3 contains start up and shut down provisions. This unit is not requesting for startup and shut down provisions. Therefore, this section will not be discussed any further.

Section 5.4 requires that operators of any unit subject to the applicable emission limits of the rule shall install and maintain an operational APCO approved Continuous Emissions Monitoring System (CEMS) for NO_x, CO, and oxygen, or implement an APCO-approved Alternate Monitoring System. The facility is monitoring periodic flue gas recirculation rate. In addition, the operator of any Category H unit listed in Section 5.1.1 Table 1 and any unit subject to Section 5.2.1 or 5.2.2 shall install and maintain an operational non-resettable, totalizing mass or volumetric flow meter in each fuel line to each unit. Volumetric flow measurements shall be periodically compensated for temperature and pressure. A master meter, which measures fuel to all units in a group of similar units, may satisfy these requirements if approved by the APCO in writing. The cumulative annual fuel usage may be verified from utility service meters, purchase or tank fill records, or other acceptable methods, as approved by the APCO.

a. N-1330-15-2: 8.4 MMBTU/HR HURST MODEL S4-200-150 BOILER WITH AN INDUSTRIAL COMBUSTION LOW NOX BURNER AND INDUCED FLUE GAS RECIRCULATION

Conditions 4 and 8 through 12 of the proposed permit requirements ensure compliance with this section.

Per Section 5.5 the facility must comply with monitoring determination as described below.

- The operator of any unit shall have the option of complying with either the applicable heat input (lb/MMBtu) emission limits or the concentration (ppmv) emission limits specified in Section 5.1. The emission limits selected to demonstrate compliance shall be specified in the source test proposal pursuant to Rule 1081 (Source Sampling).
- All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. Unless otherwise specified in the Permit to Operate no determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0.

- For emissions source testing performed pursuant to Section 6.3.1 for the purpose of determining compliance with an applicable standard or numerical limitation of this rule, the arithmetic average of three (3) 30-consecutive-minute test runs shall apply. If two (2) of three (3) runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit.
- a. N-1330-15-2: 8.4 MMBTU/HR HURST MODEL S4-200-150 BOILER WITH AN INDUSTRIAL COMBUSTION LOW NOX BURNER AND INDUCED FLUE GAS RECIRCULATION

Conditions 15, 17, and 22 of the proposed permit requirements ensure compliance with this section.

Section 6.1 requires that records shall be maintained for five calendar years and shall be made available to the APCO upon request.

Section 6.2 identifies the applicable test methods.

Section 6.3 requires each unit subject to the requirements in Sections 5.1 or 5.2.3 shall be source tested to determine compliance with the applicable emission limits at least once every 12 months, (no more than 30 days before or after the required annual source test date). Units that demonstrate compliance on two consecutive 12-month source tests may defer the following 12-month source test for up to 36 months (no more than 30 days before or after the required 36-month source test date). During the 36-month source testing interval, the operator shall tune the unit in accordance with the provisions of Section 5.2.1, and shall monitor, on a monthly basis, the unit's operational characteristics recommended by the manufacturer to ensure compliance with the applicable emission limits specified in Sections 5.1 or 5.2.3. Tune-ups required by Sections 5.2.1 and 6.3.1 do not need to be performed for units that operate and maintain an APCO approved CEMS or an APCO approved Alternate Monitoring System where the applicable emission limits are periodically monitored. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits specified in Sections 5.1 or 5.2.3, the source testing frequency shall revert to at least once every 12 months. Failure to comply with the requirements Section 6.3.1, or any source test results that exceed the applicable emission limits in Sections 5.1 or 5.2.3 shall constitute a violation of this rule.

The following permit requirements ensure compliance with this rule:

- a. N-1330-15-2: 8.4 MMBTU/HR HURST MODEL S4-200-150 BOILER WITH AN INDUSTRIAL COMBUSTION LOW NOX BURNER AND INDUCED FLUE GAS RECIRCULATION

Conditions 13, 14, 16, 19, 20, 21, 25, and 26 of the proposed permit requirements ensure compliance with this section.

10. District Rule 4320 – Advanced Emission Reduction Options for Boilers, Steam Generators, and Process Heaters Greater Than 5 MMBtu/hr

The purpose of this rule is to limit emissions of oxides of nitrogen (NO_x), carbon monoxide (CO), oxides of sulfur (SO₂), and particulate matter 10 microns or less (PM₁₀) from boilers, steam generators, and process heaters. This rule applies to any gaseous fuel or liquid fuel fired boiler, steam generator, or process heater with a total rated heat input greater than 5 million Btu per hour.

Per Section 5.1 An operator of a unit(s) subject to this rule shall comply with all applicable requirements of the rule and one of the following, on a unit-by-unit basis:

- Operate the unit to comply with the emission limits specified in Sections 5.2 and 5.4; or
- Pay an annual emissions fee to the District as specified in Section 5.3 and comply with the control requirements specified in Section 5.4; or
- Comply with the applicable Low-use Unit requirements of Section 5.5.

The facility will comply with Section 5.2, Annual Fee Calculations and Section 5.4, Particulate Matter Control Requirements.

- a. N-1330-15-2: 8.4 MMBTU/HR HURST MODEL S4-200-150 BOILER WITH AN INDUSTRIAL COMBUSTION LOW NOX BURNER AND INDUCED FLUE GAS RECIRCULATION

Conditions 3, 6, 24, 27, and 28 of the proposed permit requirements ensure compliance with this section.

11. 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. This rule applies to can and coil coating operations, and to organic solvent cleaning, storage and disposal associated with can and coil coating operations.

Section 5.1 requires that for any coating line, an operator shall not use or apply any coating with a VOC content in excess of the limits in Table 1, 2, 3,

and 4, expressed as grams of VOC per liter of coating, as applied, excluding water and exempt compounds. Tables 1 and 2 apply to can coating operations. Table 3 applies to drums, pails, and lids coating operations. Table 4 applies to coil coating operation. This facility manufactures drums. The coating operations at this facility are only subject to Table 3. Therefore only the VOC requirements in Table 3 will be discussed.

Table 3 – Drums, Pails and Lids Coating Operations

Coating Type	Application Method	VOC Content (g/l)
Sheet Base Coating (Interior or Exterior)	Any	225
Interior Body Spray	Spray	
New		510
Reconditioned		510
Exterior Body Spray	Spray	
New		510
Reconditioned		510
Overvarnished (Interior or Exterior)	Any	225
Interior End Coating	Spray or roll coat	
New		510
Reconstructed		510
Exterior End Coating	Spray or roll coat	
New		510
Reconstructed		510
Side Seam Coating	Spray	660
End Seam Coating	Any	440

a. N-1330-2-2: CAN AND COIL COATING OPERATION CONSISTING OF A HEAD AND BOTTOM PART INTERIOR COATING BOOTH

Condition 6 of the proposed permit requirements ensures compliance with this section.

b. N-1330-3-1: CAN AND COIL COATING OPERATION CONSISTING OF A BINKS EXTERIOR BODY BOOTH

Condition 3 of the proposed permit requirements ensures compliance with this section.

c. N-1330-4-1: CAN AND COIL COATING OPERATION CONSISTING OF CENTRIFUGAL COATER (#2) AND RHEEM DESIGN BOOTH

Condition 3 of the proposed permit requirements ensures compliance with this section.

d. N-1330-5-1: CAN AND COIL COATING OPERATION CONSISTING OF CENTRIFUGAL COATER (#1)

Condition 3 of the proposed permit requirements ensures compliance with this section.

e. N-1330-6-2: CAN AND COIL COATING OPERATION CONSISTING OF AN EXTERIOR HEAD PARTS COATING BOOTH

Condition 6 of the proposed permit requirements ensures compliance with this section.

Section 5.2 outlines the requirements for an approved VOC emission control system.

- The use of coatings with VOC contents in excess of the applicable limits specified in Table 1, Table 2, Table 3, or Table 4, or alternatives to applicable provisions of Sections 5.4 or 5.6, shall be allowed, provided emissions of VOC to the atmosphere are controlled by an APCO-approved VOC emission control system that complies with the requirements of Sections 5.2.2 through 5.2.9.
- The VOC emission control system shall have an overall capture and control efficiency of at least 90 percent by weight; and
- The VOC emission control system shall reduce VOC emissions, at all times, to a level that is not greater than the emission level which would have been achieved through the use of materials compliant with the applicable requirements of Section 5.1 and Section 5.4.
- The VOC emission control system shall comply with the requirements of Sections 5.2.2 and 5.2.3 during periods of emission-producing activities.
- The VOC emission control system used to comply with the provisions of this rule shall be under District permit.
- An operator using a VOC emission control system to comply with provisions of this rule shall monitor key system operating parameters.
- An operator using a VOC emission control system to comply with the provisions of this rule shall implement an Operation and Maintenance Plan pursuant to Section 6.5 within 10 days of APCO approval of the plan.
- Source Testing Requirements for VOC Emission Collection Devices and VOC Emission Control Devices listed in Section 5.2.8.
- Section 5.2.9 contains the details to calculate that the VOC emission control system shall reduce VOC emissions, at all times, to a level that is not greater than the emission level which would have been achieved through the use of materials compliant with the applicable requirements of Section 5.1 and Section 5.4..

e. N-1330-6-2: CAN AND COIL COATING OPERATION CONSISTING OF AN EXTERIOR HEAD PARTS COATING BOOTH

Conditions 1 through 3, 14, and 23 through 27 of the proposed permit requirements ensure compliance with this section.

Section 5.3 contains the prohibition of specification and sale.

Section 5.4 lists the organic solvent cleaning requirements. An operator shall not use organic solvents for cleaning operations that exceed the VOC content limits specified in Table 5, in accordance with the corresponding effective date.

Table 5 VOC Limits for Organic Solvents Used in Cleaning Operations Type of Solvent

Cleaning Operation	VOC Content Limit Grams of VOC/liter of material (lb/gal)
A. Product Cleaning During Manufacturing Process or Surface Preparation for Coating Application	25 (0.21)
B. Repair and Maintenance Cleaning	25 (0.21)
C. Cleaning of Coating Application Equipment	
1. All except sheet coater for three-piece can	25 (0.21)
2. Sheet coater for three-piece can	250 (2.3)

For the cleaning of coating application equipment outside the control of a VOC emission control equipment an operator shall perform all solvent cleaning operations with cleaning material having VOC content of 25 g/L or less, unless such cleaning operations are carried out within the control of an APCO-approved emission control system that meets the requirements of Section 5.2. Sections 5.4.4 through 5.4.7 shall not apply on and after September 21, 2008.

Cleaning activities that use solvents shall be performed by one or more of the following methods:

- Wipe cleaning; or
- Application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force; or
- 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.

Solvent shall not be atomized into the open air unless it is vented to a VOC emission control system that complies with Section 5.2. This provision shall not apply to the cleaning of nozzle tips of automated spray equipment systems, except for robotic systems, and cleaning with spray bottles or containers described in Section 5.4.4.2.

An operator shall not use VOC-containing materials to clean spray equipment used for the application of coatings, adhesives, or ink, unless an enclosed system or equipment that is proven to be equally effective at controlling emissions is used for cleaning. If an enclosed system is used, it must totally enclose spray guns, cups, nozzles, bowls, and other parts during washing, rinsing and draining procedures, and it must be used according to the manufacturer's recommendations and must be closed when not in use. To determine solvent losses, an operator shall use the test method in Section 6.7.3.

An operator cleaning coating application equipment corresponding to Table 5 - Category C (Cleaning of Coating Application Equipment) that is not spray application equipment may use an alternative cleaning method other than those specified in Section 5.4.4, if the alternative cleaning method is approved by the APCO and EPA.

In lieu of complying with the VOC content limits in Table 5 or the requirements of Sections 5.4.4 through 5.4.7, an operator may control emissions from cleaning operations with an APCO-approved VOC emission control system that meets the requirements of Section 5.2.

An operator shall store or dispose of fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc, coatings, adhesives, catalysts, and thinners in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty.

a. N-1330-2-2: CAN AND COIL COATING OPERATION CONSISTING OF A HEAD AND BOTTOM PART INTERIOR COATING BOOTH

Conditions 7 through 11 of the proposed permit requirements ensure compliance with these sections.

b. N-1330-3-1: CAN AND COIL COATING OPERATION CONSISTING OF A BINKS EXTERIOR BODY BOOTH

Conditions 2 through 6 of the proposed permit requirements ensure compliance with these sections.

c. N-1330-4-1: CAN AND COIL COATING OPERATION CONSISTING OF CENTRIFUGAL COATER (#2) AND RHEEM DESIGN BOOTH

Conditions 2 through 6 of the proposed permit requirements ensure compliance with these sections.

d. N-1330-5-1: CAN AND COIL COATING OPERATION CONSISTING OF CENTRIFUGAL COATER (#1)

Conditions 2 through 6 of the proposed permit requirements ensure compliance with these sections.

e. N-1330-6-2: CAN AND COIL COATING OPERATION CONSISTING OF AN EXTERIOR HEAD PARTS COATING BOOTH

Conditions 7 through 11 of the proposed permit requirements ensure compliance with these sections.

f. N-1330-7-5 SHEET ROLL COATER SYSTEM CONSISTING OF A WAGNER ROLL COAT MACHINE WITH A VOC CAPTURE ENCLOSURE AND A 12.5 MMBTU/HR WAGNER PAINT CURING OVEN WITH A 2.6 MMBTU/HR JO ROSS ENGINEERING DIRECT FLAME AFTERBURNER

Conditions 15 through 19 of the proposed permit requirements ensure compliance with these sections.

Section 5.6 outlines the requirements for application equipment. An operator shall not apply any coating unless:

- The coating is applied with properly operating coating application equipment, and
- The coating application equipment is operated according to operating procedures specified by the equipment manufacturer, and
- The coating application equipment complies with the requirements of Section 5.6.2.

An operator shall not apply any coating except by use of one or more of the following methods:

- Electrostatic Application
- Flow Coater
- Roll Coater
- Dip Coater

- Hand Application Methods
- HVLP Spray - For HVLP spray guns manufactured prior to January 1, 1996, the end user shall demonstrate that the gun meets HVLP spray equipment standards. Satisfactory proof will be either in the form of a manufacturer's published technical material or by a demonstration using a certified air pressure tip gauge, measuring the air atomizing pressure dynamically at the center of the air cap and at the air horns. In addition, an operator shall not sell or offer for sale for use within the District any HVLP spray gun without a permanent marking denoting the maximum inlet air pressure in psig at which the gun will operate. Limits are between 0.1 psig and 10.0 psig of air atomizing pressure.
- Any other application method that demonstrates, to the satisfaction of the APCO and EPA, a coating transfer efficiency of at least 65 percent ($\geq 65\%$) as measured using a test method pursuant to Section 6.7.4.

In lieu of complying with application methods listed above, an operator may control emissions from application equipment with an APCO-approved VOC emission control system that controls the emissions from the source operation pursuant to the requirements of Section 5.2.

a. N-1330-2-2: CAN AND COIL COATING OPERATION CONSISTING OF A HEAD AND BOTTOM PART INTERIOR COATING BOOTH

Condition 12 of the proposed permit requirements ensures compliance with this section.

b. N-1330-3-1: CAN AND COIL COATING OPERATION CONSISTING OF A BINKS EXTERIOR BODY BOOTH

Condition 7 of the proposed permit requirements ensures compliance with this section.

c. N-1330-4-1: CAN AND COIL COATING OPERATION CONSISTING OF CENTRIFUGAL COATER (#2) AND RHEEM DESIGN BOOTH

Condition 7 of the proposed permit requirements ensures compliance with this section.

d. N-1330-5-1: CAN AND COIL COATING OPERATION CONSISTING OF CENTRIFUGAL COATER (#1)

Condition 7 of the proposed permit requirements ensures compliance with this section.

e. N-1330-6-2: CAN AND COIL COATING OPERATION CONSISTING OF AN EXTERIOR HEAD PARTS COATING BOOTH

Condition 12 of the proposed permit requirements ensures compliance with this section.

- f. N-1330-7-5 SHEET ROLL COATER SYSTEM CONSISTING OF A WAGNER ROLL COAT MACHINE WITH A VOC CAPTURE ENCLOSURE AND A 12.5 MMBTU/HR WAGNER PAINT CURING OVEN WITH A 2.6 MMBTU/HR JO ROSS ENGINEERING DIRECT FLAME AFTERBURNER

Condition 20 of the proposed permit requirements ensures compliance with these sections.

Section 6.0 contains the administrative requirements for this rule. This section includes the requirements for record keeping of coating and solvent use, and the VOC emissions control system. This rule also contains the requirements for the VOC emission control system operation and maintenance plan. This section includes test methods.

- a. N-1330-2-2: CAN AND COIL COATING OPERATION CONSISTING OF A HEAD AND BOTTOM PART INTERIOR COATING BOOTH

Conditions 13 through 17 of the proposed permit requirements ensure compliance with this section.

- b. N-1330-3-1: CAN AND COIL COATING OPERATION CONSISTING OF A BINKS EXTERIOR BODY BOOTH

Conditions 8 through 12 of the proposed permit requirements ensure compliance with this section.

- c. N-1330-4-1: CAN AND COIL COATING OPERATION CONSISTING OF CENTRIFUGAL COATER (#2) AND RHEEM DESIGN BOOTH

Conditions 8 through 12 of the proposed permit requirements ensure compliance with this section.

- d. N-1330-5-1: CAN AND COIL COATING OPERATION CONSISTING OF CENTRIFUGAL COATER (#1)

Conditions 8 through 12 of the proposed permit requirements ensure compliance with this section.

- e. N-1330-6-2: CAN AND COIL COATING OPERATION CONSISTING OF AN EXTERIOR HEAD PARTS COATING BOOTH

Conditions 13 through 17 of the proposed permit requirements ensure compliance with this section.

- f. N-1330-7-5 SHEET ROLL COATER SYSTEM CONSISTING OF A WAGNER ROLL COAT MACHINE WITH A VOC CAPTURE ENCLOSURE AND A 12.5 MMBTU/HR WAGNER PAINT CURING OVEN WITH A 2.6 MMBTU/HR JO ROSS ENGINEERING DIRECT FLAME AFTERBURNER

Conditions 30 through 38 of the proposed permit requirements ensure compliance with these sections.

14. District Rule 4801 – Sulfur Compounds

The purpose of this rule is to limit the emissions of sulfur compounds. A maximum concentration and test method are specified. The provisions of this rule shall apply to any discharge to the atmosphere of sulfur compounds, which would exist as a liquid or a gas at standard conditions.

A person shall not discharge into the atmosphere sulfur compounds, which would exist as a liquid or gas at standard conditions, exceeding in concentration at the point of discharge: two-tenths (0.2) percent by volume calculated as sulfur dioxide (SO₂), on a dry basis averaged over 15 consecutive minutes. EPA Method 8 and ARB Method 1-100 (Continuous Emission Stack Sampling) shall be used to determine such emissions.

- a. N-1330-15-2: 8.4 MMBTU/HR HURST MODEL S4-200-150 BOILER WITH AN INDUSTRIAL COMBUSTION LOW NOX BURNER AND INDUCED FLUE GAS RECIRCULATION

Condition 3 of the proposed permit requirements ensures compliance with this rule.

15. 40 CFR Part 64 – Compliance Assurance Monitoring (CAM)

To be subject to CAM for a particular pollutant, an emissions unit must meet all of the following criteria:

- The unit must have an emission limit for the pollutant,
 - The unit must have add-on controls for the pollutant, and
 - The pre-control potential to emit for the unit must exceed major source thresholds.
- a. N-1330-2-2: CAN AND COIL COATING OPERATION CONSISTING OF A HEAD AND BOTTOM PART INTERIOR COATING BOOTH

This unit has emission limits for VOC. However, the unit is not equipped with an add-on control for VOC emission. Therefore this unit is not subject to CAM.

b. N-1330-3-1: CAN AND COIL COATING OPERATION CONSISTING OF A BINKS EXTERIOR BODY BOOTH

This unit does not contain emission limits for any pollutant. Therefore this unit is not subject to CAM.

c. N-1330-4-1: CAN AND COIL COATING OPERATION CONSISTING OF CENTRIFUGAL COATER (#2) AND RHEEM DESIGN BOOTH

This unit does not contain emission limits for any pollutant. Therefore this unit is not subject to CAM.

d. N-1330-5-1: CAN AND COIL COATING OPERATION CONSISTING OF CENTRIFUGAL COATER (#1)

This unit does not contain emission limits for any pollutant. Therefore this unit is not subject to CAM.

e. N-1330-6-2: CAN AND COIL COATING OPERATION CONSISTING OF AN EXTERIOR HEAD PARTS COATING BOOTH

This unit has emission limits for VOC. However, the unit is not equipped with an add-on control for VOC emission. Therefore this unit is not subject to CAM.

f. N-1330-7-5: SHEET ROLL COATER SYSTEM CONSISTING OF A WAGNER ROLL COAT MACHINE WITH A VOC CAPTURE ENCLOSURE AND A 12.5 MMBTU/HR WAGNER PAINT CURING OVEN WITH A 2.6 MMBTU/HR JO ROSS ENGINEERING DIRECT FLAME AFTERBURNER

This permit unit has emissions limits for NO_x, SO_x, PM₁₀, and CO but it does not have add-on controls for these criteria pollutants. Therefore, this permit unit is not subject to CAM for NO_x, SO_x, PM₁₀, and CO.

This permit may be subject to CAM for VOC, as there is a VOC emission limit, and has add-on controls in the form of a VOC capture enclosure vented to an after burner. As shown below, the pre-control potential to emit is greater than the major source threshold of 20,000 pounds VOC/year. Therefore, this permit unit is subject to CAM.

Calculations:

Per current permit unit requirements (See Attachment C) the annual VOC emission limit is 14,256 lb-VOC, and the afterburner has at least 95% control efficiency.

$$\begin{aligned}\text{Pre-Control PE} &= \text{Emissions Limit (lb/year)} \div (1 - \text{Control Efficiency}) \\ &= 14,256 \text{ lb-VOC/year} \div (1 - 0.95) \\ &= 285,120 \text{ lb-VOC/year}\end{aligned}$$

Since the post-control annual emissions do not exceed the Major Source threshold for VOC of 20,000 lb/year, a once-daily monitoring interval is sufficient to determine compliance with CAM. CAM is satisfied for this unit by monitoring the temperature in afterburner chamber. Conditions 1, 2, 3, 24, and 37 through 42 of the proposed permit unit requirements ensure compliance with CAM.

g. N-1330-8-1: 5 MMBTU/HR WICKET OVEN SERVED BY A FUME INCINERATOR

This unit does not contain emission limits for any pollutant. Therefore this unit is not subject to CAM.

h. N-1330-9-1: 5.1 MMBTU/HR DEVILBISS PAINT BAKE OVEN SERVED BY A FUME INCINERATOR

This unit does not contain emission limits for any pollutant. Therefore this unit is not subject to CAM.

i. N-1330-10-1: 3.9 MMBTU/HR BLU SURF PAINT BAKE OVEN SERVED BY A FUME INCINERATOR

This unit does not contain emission limits for any pollutant. Therefore this unit is not subject to CAM.

j. N-1330-12-1: ELECTRO PLATING OPERATION SERVED BY A FUME SCRUBBER

This unit does not contain emission limits for any pollutant. Therefore this unit is not subject to CAM.

k. N-1330-15-2: 8.4 MMBTU/HR HURST MODEL S4-200-150 BOILER WITH AN INDUSTRIAL COMBUSTION LOW NOX BURNER AND INDUCED FLUE GAS RECIRCULATION

This permit unit has emissions limits for SO_x, PM₁₀, CO, and VOC but it does not have add-on controls for these criteria pollutants. Therefore, this permit unit is not subject to CAM for SO_x, PM₁₀, CO, and VOC.

This permit may be subject to CAM for NO_x, as there is a NO_x limit, and has add-on controls in the form of FGR. However, as shown below, the pre-control potential to emit is not greater than the major source threshold of 20,000 pounds NO_x/year. Therefore, this permit unit is not subject to CAM

Calculations:

The control efficiency for FGR was determined using the following AP-42 emission factors from Table 1.4.1 (7/98) for small boilers < 100 MMBtu/hr.

	Emission Factor (lb/10 ⁶ scf)
Uncontrolled	100
Controlled – low NO _x burner	50
Controlled Low NO _x burner and Flue Gas Recirculation	32

The control efficiency of FGR is,

$$100 \times (50 \text{ lb}/10^6 \text{ scf} - 32 \text{ lb}/10^6 \text{ scf}) \div 50 \text{ lb}/10^6 \text{ scf} = 36\%$$

The emission factor for these units is limited by Rule 4306 to 30 ppmv @ 3% O₂ or 0.036 lb-MMBtu/hr. The maximum annual heat input is 30 billion BTU.

$$\begin{aligned} \text{Emission Factor}_{\text{Pre-Control}} &= \text{Controlled EF} / (1 - \text{Control Efficiency}) \\ &= (0.036 \text{ lb-NO}_x/\text{MMBtu}) / (1 - 0.36) \\ &= 0.056 \text{ lb-NO}_x/\text{MMBtu} \end{aligned}$$

$$\begin{aligned} \text{Pre-Control PE} &= \text{Annual Heat Input} \times \text{Emission Factor}_{\text{Pre-Control}} \\ &= 30,000 \text{ MMBtu/hr} \times 0.056 \text{ lb-NO}_x/\text{MMBtu} \\ &= 1,680 \text{ lb-NO}_x/\text{yr} \end{aligned}$$

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

B. Requirements not Addressed by Model General Permit Templates

The facility is not proposing to have any permit shields added to their permits that are not subject to model general permit template.

XI. PERMIT CONDITIONS

See draft operating permit beginning on the following page.

San Joaquin Valley Air Pollution Control District

FACILITY: N-1330-0-1

EXPIRATION DATE: 09/30/2014

FACILITY-WIDE REQUIREMENTS

1. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. {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
3. {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
4. {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
5. {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
6. {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
7. {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
8. {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
9. {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: GREIF INDUSTRIAL PACKAGING & SERVS LLC
Location: 2400 COOPER AVE, MERCED, CA 95344

N-1330-0-1: Sep 25 2012 10:16AM - GONZALEV

10. {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
11. {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
12. {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
13. {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
14. {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
15. {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
16. {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
17. {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
18. {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
19. {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
20. {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
21. {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
22. {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.

23. {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
24. {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
25. {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
26. {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
27. {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
28. {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
29. {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
30. {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
31. {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
32. {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
33. {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
34. {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.

35. {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
36. {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
37. {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
38. {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
39. {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
40. {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
41. {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
42. On xxx xx, xxxx , 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-1330-2-2

EXPIRATION DATE: 09/30/2014

EQUIPMENT DESCRIPTION:

CAN AND COIL COATING OPERATION CONSISTING OF A HEAD AND BOTTOM PART INTERIOR COATING BOOTH

PERMIT UNIT REQUIREMENTS

1. Exhaust fans shall be switched on prior to the start of paint spraying operations. [District Rule 2201] Federally Enforceable Through Title V Permit
2. All filters shall be properly maintained and must be in place during the painting operation. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The particulate matter emissions from the stack of the paint spray booth shall not exceed 0.1 gr/scf and there shall be no visible emissions. [District Rules 2201 and 4201] Federally Enforceable Through Title V Permit
4. The VOC emissions shall not exceed 26.4 pounds per day. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The VOC emissions shall not exceed 235 pounds in the first quarter, 1134 pounds in the second quarter, 1742 pounds in the third quarter and 571 pounds in the fourth quarter. [District Rule 2201] Federally Enforceable Through Title V Permit
6. VOC content of any coatings as applied, excluding water and exempt compounds used for drums, pails and lids shall not exceed any of the following limits: interior body spray and end coating of new products: 420 g/l; interior body spray and end coating of reconditioned products: 510 g/l; exterior body spray and end coating of new products: 340 g/l; exterior body spray and end coating of reconstructed products: 420 g/l; side seam coating: 660 g/l; and end seal compound: 60 g/l [District Rule 4604] Federally Enforceable Through Title V Permit
7. All solvent cleaning activities shall be performed using solvents with VOC contents not exceeding any of the following limits unless such cleaning operations are performed within the control of an APCO-approved emission control system that meets the requirements of District Rule 4604 (9/20/07): (a). Product cleaning during manufacturing process or surface preparation for coating application: 25 g/l (0.21 lb/gal); (b). Repair and maintenance cleaning: 25 g/l (0.21 lb/gal); (c). Cleaning of sheet coater for three-piece cans: 250 g/l (2.3 lb/gal). [District Rule 4604] Federally Enforceable Through Title V Permit
8. Cleaning activities that use solvents with a VOC content greater than 25 g/l (0.21 lb/gallon) shall be performed by one or more of the following methods: 1) Wipe cleaning; 2) Application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force; 3) 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 4) 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. An operator cleaning coating application equipment that is not spray application equipment may use an alternative cleaning method other than those listed above if the alternative cleaning method is approved by the District and Environmental Protection Agency (EPA). [District Rule 4604] 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.

9. Solvent shall not be atomized into the open air. This provision shall not apply to the cleaning of nozzle tips of automated spray equipment systems, except for robotic systems, and cleaning with spray bottles or containers described in District Rule 4604. [District Rule 4604] Federally Enforceable Through Title V Permit
10. Permittee shall not use materials with a VOC content greater than 25 g/l (0.21 lb/gal) to clean spray equipment used for the application of coatings unless an enclosed system or equipment proven to be equally effective in controlling emissions is used for cleaning. [District Rule 4604] Federally Enforceable Through Title V Permit
11. A person shall store or dispose of fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc; coatings; adhesives; catalysts; and thinners in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4604] Federally Enforceable Through Title V Permit
12. A person shall not apply any coating except by the use of one or more of the following methods: electrostatic, flow, roll, dip, hand application, HVLP spray, or any other coating method that demonstrates, to the satisfaction of the APCO and the EPA, a coating transfer efficiency of at least 65% as measured using a test method pursuant to District Rule 4604. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4604] Federally Enforceable Through Title V Permit
13. Operator shall maintain and have available during inspections, a current list of the coatings in use. The list shall include the coating data necessary to evaluate compliance including the following information as applicable: 1) Specific manufacturer's name of coatings, catalysts, and thinners used; 2) Mix ratio of components used; 3) VOC content of each coating, as applied in g/l or lb/gal; 4) VOC content of each catalyst and thinner in g/l or lb/gal. [District Rule 4604] Federally Enforceable Through Title V Permit
14. Operator shall maintain and have available during inspections, a current list of solvents in use that provides all data necessary to evaluate compliance including the following information as applicable: 1) The name of the cleaning solvent and its manufacturer's name; 2) VOC content of the solvent in g/l or lb/gal. [District Rule 4604] Federally Enforceable Through Title V Permit
15. Records shall be maintained on a daily basis and shall include the following coating information: 1) Specific coating used and the mix ratio of components added to the coating material prior to application; 2) Volume of coatings applied (gallons); 3) Specific solvents, catalysts, and thinners used; 4) Volume of each solvent, catalyst, and thinner (gallons) used. [District Rule 4604] Federally Enforceable Through Title V Permit
16. Records shall be maintained on a daily basis and shall include the following solvent information: 1) Name of cleaning solvent used; 2) When the solvent is a mixture of different materials that are blended by the operator, the mix ratio of the batch; 3) Volume of each cleaning solvent used (gallons); 4) The type of cleaning activity for each solvent. [District Rule 4604] Federally Enforceable Through Title V Permit
17. All records shall be maintained on site for a period of at least five years and shall be made available for District inspection upon request. [District Rules 1070, and 4604] 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-1330-3-1

EXPIRATION DATE: 09/30/2014

EQUIPMENT DESCRIPTION:

CAN AND COIL COATING OPERATION CONSISTING OF A BINKS EXTERIOR BODY BOOTH

PERMIT UNIT REQUIREMENTS

1. VOC content of any coatings as applied, excluding water and exempt compounds used for drums, pails and lids shall not exceed any of the following limits: interior body spray and end coating of new products: 420 g/l; interior body spray and end coating of reconditioned products: 510 g/l; exterior body spray and end coating of new products: 340 g/l; exterior body spray and end coating of reconstructed products: 420 g/l; side seam coating: 660 g/l; and end seal compound: 60 g/l [District Rule 4604] Federally Enforceable Through Title V Permit
2. All solvent cleaning activities shall be performed using solvents with VOC contents not exceeding any of the following limits unless such cleaning operations are performed within the control of an APCO-approved emission control system that meets the requirements of District Rule 4604 (9/20/07): (a). Product cleaning during manufacturing process or surface preparation for coating application: 25 g/l (0.21 lb/gal); (b). Repair and maintenance cleaning: 25 g/l (0.21 lb/gal); (c). Cleaning of sheet coater for three-piece cans: 250 g/l (2.3 lb/gal). [District Rule 4604] Federally Enforceable Through Title V Permit
3. Cleaning activities that use solvents with a VOC content greater than 25 g/l (0.21 lb/gallon) shall be performed by one or more of the following methods: 1) Wipe cleaning; 2) Application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force; 3) 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 4) 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. An operator cleaning coating application equipment that is not spray application equipment may use an alternative cleaning method other than those listed above if the alternative cleaning method is approved by the District and Environmental Protection Agency (EPA). [District Rule 4604] Federally Enforceable Through Title V Permit
4. Solvent shall not be atomized into the open air. This provision shall not apply to the cleaning of nozzle tips of automated spray equipment systems, except for robotic systems, and cleaning with spray bottles or containers described in District Rule 4604. [District Rule 4604] Federally Enforceable Through Title V Permit
5. Permittee shall not use materials with a VOC content greater than 25 g/l (0.21 lb/gal) to clean spray equipment used for the application of coatings unless an enclosed system or equipment proven to be equally effective in controlling emissions is used for cleaning. [District Rule 4604] Federally Enforceable Through Title V Permit
6. A person shall store or dispose of fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc; coatings; adhesives; catalysts; and thinners in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4604] 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.

7. A person shall not apply any coating except by the use of one or more of the following methods: electrostatic, flow, roll, dip, hand application, HVLP spray, or any other coating method that demonstrates, to the satisfaction of the APCO and the EPA, a coating transfer efficiency of at least 65% as measured using a test method pursuant to District Rule 4604. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4604] Federally Enforceable Through Title V Permit
8. Operator shall maintain and have available during inspections, a current list of the coatings in use. The list shall include the coating data necessary to evaluate compliance including the following information as applicable: 1) Specific manufacturer's name of coatings, catalysts, and thinners used; 2) Mix ratio of components used; 3) VOC content of each coating, as applied in g/l or lb/gal; 4) VOC content of each catalyst and thinner in g/l or lb/gal. [District Rule 4604] Federally Enforceable Through Title V Permit
9. Operator shall maintain and have available during inspections, a current list of solvents in use that provides all data necessary to evaluate compliance including the following information as applicable: 1) The name of the cleaning solvent and its manufacturer's name; 2) VOC content of the solvent in g/l or lb/gal. [District Rule 4604] Federally Enforceable Through Title V Permit
10. Records shall be maintained on a daily basis and shall include the following coating information: 1) Specific coating used and the mix ratio of components added to the coating material prior to application; 2) Volume of coatings applied (gallons); 3) Specific solvents, catalysts, and thinners used; 4) Volume of each solvent, catalyst, and thinner (gallons) used. [District Rule 4604] Federally Enforceable Through Title V Permit
11. Records shall be maintained on a daily basis and shall include the following solvent information: 1) Name of cleaning solvent used; 2) When the solvent is a mixture of different materials that are blended by the operator, the mix ratio of the batch; 3) Volume of each cleaning solvent used (gallons); 4) The type of cleaning activity for each solvent. [District Rule 4604] Federally Enforceable Through Title V Permit
12. All records shall be maintained on site for a period of at least five years and shall be made available for District inspection upon request. [District Rules 1070, and 4604] 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-1330-4-1

EXPIRATION DATE: 09/30/2014

EQUIPMENT DESCRIPTION:

CAN AND COIL COATING OPERATION CONSISTING OF CENTRIFUGAL COATER (#2) AND RHEEM DESIGN BOOTH

PERMIT UNIT REQUIREMENTS

1. VOC content of any coatings as applied, excluding water and exempt compounds used for drums, pails and lids shall not exceed any of the following limits: interior body spray and end coating of new products: 420 g/l; interior body spray and end coating of reconditioned products: 510 g/l; exterior body spray and end coating of new products: 340 g/l; exterior body spray and end coating of reconstructed products: 420 g/l; side seam coating: 660 g/l; and end seal compound: 60 g/l [District Rule 4604] Federally Enforceable Through Title V Permit
2. All solvent cleaning activities shall be performed using solvents with VOC contents not exceeding any of the following limits unless such cleaning operations are performed within the control of an APCO-approved emission control system that meets the requirements of District Rule 4604 (9/20/07): (a). Product cleaning during manufacturing process or surface preparation for coating application: 25 g/l (0.21 lb/gal); (b). Repair and maintenance cleaning: 25 g/l (0.21 lb/gal); (c). Cleaning of sheet coater for three-piece cans: 250 g/l (2.3 lb/gal). [District Rule 4604] Federally Enforceable Through Title V Permit
3. Cleaning activities that use solvents with a VOC content greater than 25 g/l (0.21 lb/gallon) shall be performed by one or more of the following methods: 1) Wipe cleaning; 2) Application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force; 3) 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 4) 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. An operator cleaning coating application equipment that is not spray application equipment may use an alternative cleaning method other than those listed above if the alternative cleaning method is approved by the District and Environmental Protection Agency (EPA). [District Rule 4604] Federally Enforceable Through Title V Permit
4. Solvent shall not be atomized into the open air. This provision shall not apply to the cleaning of nozzle tips of automated spray equipment systems, except for robotic systems, and cleaning with spray bottles or containers described in District Rule 4604. [District Rule 4604] Federally Enforceable Through Title V Permit
5. Permittee shall not use materials with a VOC content greater than 25 g/l (0.21 lb/gal) to clean spray equipment used for the application of coatings unless an enclosed system or equipment proven to be equally effective in controlling emissions is used for cleaning. [District Rule 4604] Federally Enforceable Through Title V Permit
6. A person shall store or dispose of fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc; coatings; adhesives; catalysts; and thinners in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4604] 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.

7. A person shall not apply any coating except by the use of one or more of the following methods: electrostatic, flow, roll, dip, hand application, HVLP spray, or any other coating method that demonstrates, to the satisfaction of the APCO and the EPA, a coating transfer efficiency of at least 65% as measured using a test method pursuant to District Rule 4604. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4604] Federally Enforceable Through Title V Permit
8. Operator shall maintain and have available during inspections, a current list of the coatings in use. The list shall include the coating data necessary to evaluate compliance including the following information as applicable: 1) Specific manufacturer's name of coatings, catalysts, and thinners used; 2) Mix ratio of components used; 3) VOC content of each coating, as applied in g/l or lb/gal; 4) VOC content of each catalyst and thinner in g/l or lb/gal. [District Rule 4604] Federally Enforceable Through Title V Permit
9. Operator shall maintain and have available during inspections, a current list of solvents in use that provides all data necessary to evaluate compliance including the following information as applicable: 1) The name of the cleaning solvent and its manufacturer's name; 2) VOC content of the solvent in g/l or lb/gal. [District Rule 4604] Federally Enforceable Through Title V Permit
10. Records shall be maintained on a daily basis and shall include the following coating information: 1) Specific coating used and the mix ratio of components added to the coating material prior to application; 2) Volume of coatings applied (gallons); 3) Specific solvents, catalysts, and thinners used; 4) Volume of each solvent, catalyst, and thinner (gallons) used. [District Rule 4604] Federally Enforceable Through Title V Permit
11. Records shall be maintained on a daily basis and shall include the following solvent information: 1) Name of cleaning solvent used; 2) When the solvent is a mixture of different materials that are blended by the operator, the mix ratio of the batch; 3) Volume of each cleaning solvent used (gallons); 4) The type of cleaning activity for each solvent. [District Rule 4604] Federally Enforceable Through Title V Permit
12. All records shall be maintained on site for a period of at least five years and shall be made available for District inspection upon request. [District Rules 1070, and 4604] 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-1330-5-1

EXPIRATION DATE: 09/30/2014

EQUIPMENT DESCRIPTION:

CAN AND COIL COATING OPERATION CONSISTING OF CENTRIFUGAL COATER (#1)

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PERMIT UNIT REQUIREMENTS

1. VOC content of any coatings as applied, excluding water and exempt compounds used for drums, pails and lids shall not exceed any of the following limits: interior body spray and end coating of new products: 420 g/l; interior body spray and end coating of reconditioned products: 510 g/l; exterior body spray and end coating of new products: 340 g/l; exterior body spray and end coating of reconstructed products: 420 g/l; side seam coating: 660 g/l; and end seal compound: 60 g/l [District Rule 4604] Federally Enforceable Through Title V Permit
2. All solvent cleaning activities shall be performed using solvents with VOC contents not exceeding any of the following limits unless such cleaning operations are performed within the control of an APCO-approved emission control system that meets the requirements of District Rule 4604 (9/20/07): (a). Product cleaning during manufacturing process or surface preparation for coating application: 25 g/l (0.21 lb/gal); (b). Repair and maintenance cleaning: 25 g/l (0.21 lb/gal); (c). Cleaning of sheet coater for three-piece cans: 250 g/l (2.3 lb/gal). [District Rule 4604] Federally Enforceable Through Title V Permit
3. Cleaning activities that use solvents with a VOC content greater than 25 g/l (0.21 lb/gallon) shall be performed by one or more of the following methods: 1) Wipe cleaning; 2) Application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force; 3) 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 4) 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. An operator cleaning coating application equipment that is not spray application equipment may use an alternative cleaning method other than those listed above if the alternative cleaning method is approved by the District and Environmental Protection Agency (EPA). [District Rule 4604] Federally Enforceable Through Title V Permit
4. Solvent shall not be atomized into the open air. This provision shall not apply to the cleaning of nozzle tips of automated spray equipment systems, except for robotic systems, and cleaning with spray bottles or containers described in District Rule 4604. [District Rule 4604] Federally Enforceable Through Title V Permit
5. Permittee shall not use materials with a VOC content greater than 25 g/l (0.21 lb/gal) to clean spray equipment used for the application of coatings unless an enclosed system or equipment proven to be equally effective in controlling emissions is used for cleaning. [District Rule 4604] Federally Enforceable Through Title V Permit
6. A person shall store or dispose of fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc; coatings; adhesives; catalysts; and thinners in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4604] 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.

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7. A person shall not apply any coating except by the use of one or more of the following methods: electrostatic, flow, roll, dip, hand application, HVLP spray, or any other coating method that demonstrates, to the satisfaction of the APCO and the EPA, a coating transfer efficiency of at least 65% as measured using a test method pursuant to District Rule 4604. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4604] Federally Enforceable Through Title V Permit
8. Operator shall maintain and have available during inspections, a current list of the coatings in use. The list shall include the coating data necessary to evaluate compliance including the following information as applicable: 1) Specific manufacturer's name of coatings, catalysts, and thinners used; 2) Mix ratio of components used; 3) VOC content of each coating, as applied in g/l or lb/gal; 4) VOC content of each catalyst and thinner in g/l or lb/gal. [District Rule 4604] Federally Enforceable Through Title V Permit
9. Operator shall maintain and have available during inspections, a current list of solvents in use that provides all data necessary to evaluate compliance including the following information as applicable: 1) The name of the cleaning solvent and its manufacturer's name; 2) VOC content of the solvent in g/l or lb/gal. [District Rule 4604] Federally Enforceable Through Title V Permit
10. Records shall be maintained on a daily basis and shall include the following coating information: 1) Specific coating used and the mix ratio of components added to the coating material prior to application; 2) Volume of coatings applied (gallons); 3) Specific solvents, catalysts, and thinners used; 4) Volume of each solvent, catalyst, and thinner (gallons) used. [District Rule 4604] Federally Enforceable Through Title V Permit
11. Records shall be maintained on a daily basis and shall include the following solvent information: 1) Name of cleaning solvent used; 2) When the solvent is a mixture of different materials that are blended by the operator, the mix ratio of the batch; 3) Volume of each cleaning solvent used (gallons); 4) The type of cleaning activity for each solvent. [District Rule 4604] Federally Enforceable Through Title V Permit
12. All records shall be maintained on site for a period of at least five years and shall be made available for District inspection upon request. [District Rules 1070, and 4604] 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-1330-6-2

EXPIRATION DATE: 09/30/2014

EQUIPMENT DESCRIPTION:

CAN AND COIL COATING OPERATION CONSISTING OF AN EXTERIOR HEAD PARTS COATING BOOTH

PERMIT UNIT REQUIREMENTS

1. All filters shall be properly maintained and must be in place during the painting operation. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Exhaust fans shall be switched on prior to the start of paint spraying operations. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The particulate matter emissions from the stack of the paint spray booth shall not exceed 0.1 gr/scf and there shall be no visible emissions. [District Rule 2201 and District Rule 4201] Federally Enforceable Through Title V Permit
4. The VOC emissions shall not exceed 12.9 pounds per day. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The VOC emissions shall not exceed 32 pounds in the first quarter, 478 pounds in the second quarter, 853 pounds in the third quarter and 44 pounds in the fourth quarter. [District Rule 2201] Federally Enforceable Through Title V Permit
6. VOC content of any coatings as applied, excluding water and exempt compounds used for drums, pails and lids shall not exceed any of the following limits: interior body spray and end coating of new products: 420 g/l; interior body spray and end coating of reconditioned products: 510 g/l; exterior body spray and end coating of new products: 340 g/l; exterior body spray and end coating of reconstructed products: 420 g/l; side seam coating: 660 g/l; and end seal compound: 60 g/l [District Rule 4604] Federally Enforceable Through Title V Permit
7. All solvent cleaning activities shall be performed using solvents with VOC contents not exceeding any of the following limits unless such cleaning operations are performed within the control of an APCO-approved emission control system that meets the requirements of District Rule 4604 (9/20/07): (a). Product cleaning during manufacturing process or surface preparation for coating application: 25 g/l (0.21 lb/gal); (b). Repair and maintenance cleaning: 25 g/l (0.21 lb/gal); (c). Cleaning of sheet coater for three-piece cans: 250 g/l (2.3 lb/gal). [District Rule 4604] Federally Enforceable Through Title V Permit
8. Cleaning activities that use solvents with a VOC content greater than 25 g/l (0.21 lb/gallon) shall be performed by one or more of the following methods: 1) Wipe cleaning; 2) Application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force; 3) 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 4) 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. An operator cleaning coating application equipment that is not spray application equipment may use an alternative cleaning method other than those listed above if the alternative cleaning method is approved by the District and Environmental Protection Agency (EPA). [District Rule 4604] 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.

9. Solvent shall not be atomized into the open air. This provision shall not apply to the cleaning of nozzle tips of automated spray equipment systems, except for robotic systems, and cleaning with spray bottles or containers described in District Rule 4604. [District Rule 4604] Federally Enforceable Through Title V Permit
10. Permittee shall not use materials with a VOC content greater than 25 g/l (0.21 lb/gal) to clean spray equipment used for the application of coatings unless an enclosed system or equipment proven to be equally effective in controlling emissions is used for cleaning. [District Rule 4604] Federally Enforceable Through Title V Permit
11. A person shall store or dispose of fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc; coatings; adhesives; catalysts; and thinners in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4604] Federally Enforceable Through Title V Permit
12. A person shall not apply any coating except by the use of one or more of the following methods: electrostatic, flow, roll, dip, hand application, HVLP spray, or any other coating method that demonstrates, to the satisfaction of the APCO and the EPA, a coating transfer efficiency of at least 65% as measured using a test method pursuant to District Rule 4604. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4604] Federally Enforceable Through Title V Permit
13. Operator shall maintain and have available during inspections, a current list of the coatings in use. The list shall include the coating data necessary to evaluate compliance including the following information as applicable: 1) Specific manufacturer's name of coatings, catalysts, and thinners used; 2) Mix ratio of components used; 3) VOC content of each coating, as applied in g/l or lb/gal; 4) VOC content of each catalyst and thinner in g/l or lb/gal. [District Rule 4604] Federally Enforceable Through Title V Permit
14. Operator shall maintain and have available during inspections, a current list of solvents in use that provides all data necessary to evaluate compliance including the following information as applicable: 1) The name of the cleaning solvent and its manufacturer's name; 2) VOC content of the solvent in g/l or lb/gal. [District Rule 4604] Federally Enforceable Through Title V Permit
15. Records shall be maintained on a daily basis and shall include the following coating information: 1) Specific coating used and the mix ratio of components added to the coating material prior to application; 2) Volume of coatings applied (gallons); 3) Specific solvents, catalysts, and thinners used; 4) Volume of each solvent, catalyst, and thinner (gallons) used. [District Rule 4604] Federally Enforceable Through Title V Permit
16. Records shall be maintained on a daily basis and shall include the following solvent information: 1) Name of cleaning solvent used; 2) When the solvent is a mixture of different materials that are blended by the operator, the mix ratio of the batch; 3) Volume of each cleaning solvent used (gallons); 4) The type of cleaning activity for each solvent. [District Rule 4604] Federally Enforceable Through Title V Permit
17. All records shall be maintained on site for a period of at least five years and shall be made available for District inspection upon request. [District Rules 1070, and 4604] 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-1330-7-5

EXPIRATION DATE: 09/30/2014

EQUIPMENT DESCRIPTION:

SHEET ROLL COATER SYSTEM CONSISTING OF A WAGNER ROLL COAT MACHINE WITH A VOC CAPTURE ENCLOSURE AND A 12.5 MMBTU/HR WAGNER PAINT CURING OVEN WITH A 2.6 MMBTU/HR JO ROSS ENGINEERING DIRECT FLAME AFTERBURNER

PERMIT UNIT REQUIREMENTS

1. A continuous recording device shall be installed on the afterburner chamber indicating the temperature at the end of the afterburner chamber. [District Rules 2201 and 4604; and 40 CFR Part 64] Federally Enforceable Through Title V Permit
2. The afterburner chamber shall be preheated to 1,250 degrees Fahrenheit prior to the introduction of VOC contaminated gases into the paint curing oven serving the roll coating system. [District Rules 2201 and 4604; and 40 CFR Part 64] Federally Enforceable Through Title V Permit
3. The afterburner chamber must be maintained at or above 1,250 degrees Fahrenheit during the entire operation of the roll coating system. [District Rules 2201 and 4604; and 40 CFR Part 64] Federally Enforceable Through Title V Permit
4. The paint curing oven and afterburner shall be fired exclusively on natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The destruction efficiency of the afterburner, for VOC emissions from the roll coating system, shall not be less than 95% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Particulate matter emissions from any combustion source shall not exceed 0.1 grains/dscf (calculated to 12% carbon dioxide). [District Rule 4301] Federally Enforceable Through Title V Permit
7. The PM10 emissions rate from the roll coating system shall not exceed 12.0 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The SOx emissions rate from the roll coating system shall not exceed 0.8 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The NOx emissions rate from the roll coating system shall not exceed 50.7 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The CO emissions rate from the roll coating system shall not exceed 520.0 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The VOC emissions rate from the roll coating system shall not exceed 76.6 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The total NOx emissions from the curing oven and afterburner of the roll coating system shall not exceed: 3,245 pounds in the 1st quarter, 3,296 pounds in the 2nd quarter, 3,346 pounds in the 3rd quarter, and 3,346 pounds in the 4th quarter. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The total VOC emissions from the roll coating system shall not exceed: 1,920 pounds in the 1st quarter, 4,387 pounds in the 2nd quarter, 5,056 pounds in the 3rd quarter, and 2,893 pounds in the 4th quarter. [District Rule 2201] 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.

14. VOC emissions from this operation shall be controlled by a VOC emission capture and control device with a minimum overall control efficiency of 90% (by weight) and the VOC emission control system shall reduce VOC emissions, at all times, to a level which would have been achieved through the use of materials compliant with the applicable requirements of Rule 4604. [District Rule 4604] Federally Enforceable Through Title V Permit
15. All solvent cleaning activities shall be performed using solvents with VOC contents not exceeding any of the following limits unless such cleaning operations are performed within the control of an APCO-approved emission control system that meets the requirements of District Rule 4604 (9/20/07): (a). Product cleaning during manufacturing process or surface preparation for coating application: 25 g/l (0.21 lb/gal); (b). Repair and maintenance cleaning: 25 g/l (0.21 lb/gal); (c). Cleaning of sheet coater for three-piece cans: 250 g/l (2.3 lb/gal). [District Rule 4604] Federally Enforceable Through Title V Permit
16. Cleaning activities that use solvents with a VOC content greater than 25 g/l (0.21 lb/gallon) shall be performed by one or more of the following methods: 1) Wipe cleaning; 2) Application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force; 3) 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 4) 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. An operator cleaning coating application equipment that is not spray application equipment may use an alternative cleaning method other than those listed above if the alternative cleaning method is approved by the District and Environmental Protection Agency (EPA). [District Rule 4604] Federally Enforceable Through Title V Permit
17. Solvent shall not be atomized into the open air. This provision shall not apply to the cleaning of nozzle tips of automated spray equipment systems, except for robotic systems, and cleaning with spray bottles or containers described in Rule 4604. [District Rule 4604] Federally Enforceable Through Title V Permit
18. Permittee shall not use materials with a VOC content greater than 25 g/l (0.21 lb/gal) to clean spray equipment used for the application of coatings unless an enclosed system or equipment proven to be equally effective in controlling emissions is used for cleaning. [District Rule 4604] Federally Enforceable Through Title V Permit
19. A person shall store or dispose of fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc; coatings; adhesives; catalysts; and thinners in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4604] Federally Enforceable Through Title V Permit
20. A person shall not apply any coating except by the use of one or more of the following methods: electrostatic, flow, roll, dip, hand application, HVLP spray, or any other coating method that demonstrates, to the satisfaction of the APCO and the EPA, a coating transfer efficiency of at least 65% as measured using a test method pursuant to Rule 4604. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4604] Federally Enforceable Through Title V Permit
21. Operator shall maintain and have available during inspections, a current list of the coatings in use. The list shall include the coating data necessary to evaluate compliance including the following information as applicable: 1) Specific manufacturer's name of coatings, catalysts, and thinners used; 2) Mix ratio of components used; 3) VOC content of each coating, as applied in g/l or lb/gal; 4) VOC content of each catalyst and thinner in g/l or lb/gal. [District Rule 4604] Federally Enforceable Through Title V Permit
22. Operator shall maintain and have available during inspections, a current list of solvents in use that provides all data necessary to evaluate compliance including the following information as applicable: 1) The name of the cleaning solvent and its manufacturer's name; 2) VOC content of the solvent in g/l or lb/gal. [District Rule 4604] Federally Enforceable Through Title V Permit
23. The afterburner shall be equipped with a continuous temperature monitoring and recording instrument and be equipped with a device that shuts down the operation if the temperature of the afterburner is not maintained at a minimum operating temperature of 1,250 degree F. [District Rule 4604] 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.

24. An excursion is deemed to occur when the afterburner temperature drops below the minimum operating temperature of 1,250 degree F. Upon detecting any excursion, the permittee shall investigate the excursion and take corrective action to minimize emissions and prevent recurrence of the excursion as expeditiously as practicable. Any record of an excursion shall be reported by sending a copy of such record to the APCO within 96 hours following the occurrence. Such report shall include an explanation of the cause of the excursion and the corrective action taken. [District Rule 4606 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
25. Permittee shall submit a VOC emission control system Operation and Maintenance (O/M) plan to the APCO, and shall submit a new or modified VOC emission control system O/M plan prior to implementation of an Authority to Construct for a new or modified VOC emission control system. The VOC emission control system O/M plan shall satisfy Rule 4604. [District Rule 4604] Federally Enforceable Through Title V Permit
26. The operator shall source test the VOC emission collection device and the connected afterburner to determine the capture efficiency of the collection device and control efficiency of the afterburner at least once every twelve (12) months. Source testing of the VOC emission collection device and the connected afterburner shall be performed within 24 hours of each source test. [District Rule 4604] Federally Enforceable Through Title V Permit
27. Source testing for VOC capture and control efficiency of the VOC emission collection device and connected afterburner shall be performed under conditions representative of normal operating conditions using non-compliant coating (if applicable) and under conditions specified in the Permit-To-Operate. [District Rule 4604] Federally Enforceable Through Title V Permit
28. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
29. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
30. The capture efficiency of the VOC emission control system's collection device shall be determined according to EPA's "Guidelines for Determining Capture Efficiency," January 9, 1995 and 40 CFR 51, Appendix M, Methods 204-204F, as applicable, or any other method approved by EPA, ARB, and the District. [District Rule 4604] Federally Enforceable Through Title V Permit
31. The control efficiency of the VOC emission control system's afterburner shall be determined using EPA Method 2, 2A, or 2D for measuring flow rates and EPA Methods 25, 25A, or 25B for measuring total gaseous organic concentrations at inlet and outlet of the afterburner. EPA Method 18 or ARB Method 422 shall be used to determine the emissions of exempt compounds. [District Rule 4604] Federally Enforceable Through Title V Permit
32. The overall VOC capture and control efficiency shall be determined utilizing the latest source test results and the following equation: $CE \text{ (Capture and Control)} = [CE \text{ (Capture)} \times CE \text{ (Control)}] / 100$. Where: CE (Capture and Control) is the overall capture and control efficiency (in percent); CE (Capture) is the capture efficiency of the collection device (in percent); CE (Control) is the control efficiency of the afterburner (in percent). [District Rule 4604] Federally Enforceable Through Title V Permit
33. When required, the VOC content of coating(s), as applied, and of solvents shall be determined by United States Environmental Protection Agency (EPA) Test Method 24 or 24A, or South Coast Air Quality Management District (SCAQMD) Method 304 (Determination of Volatile Organic Compounds in Various Materials) or by using the manufacturer's product formulation data and the formula for "Grams of VOC per liter of Material" as defined in District Rule 4604. If the coating/solvent manufacturers provide certification that the previously mentioned methods are used to determine the VOC content, copies of the coating/solvent product data sheets and the certifications may be maintained, used to calculate the VOC content of the coating, as applied, and shall be considered compliance with this condition. [District Rule 4604] 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.

34. When required, the content of exempt halogenated VOCs shall be determined by using the California Air Resources Board (ARB) Test Method 432 or SCAQMD Test Method 303 (Determination of Exempt Compounds) on an annual basis, or by using the manufacturer's product formulation data and the formula for "Grams of VOC per liter of Material" as defined in District Rule 4604. If the coating/solvent manufacturers provide certification that the previously mentioned methods are used to determine the VOC content, copies of the coating/solvent product data sheets and the certifications may be maintained, used to calculate the VOC content of the coating, as applied, and shall be considered compliance with this condition. [District Rule 4604] Federally Enforceable Through Title V Permit
35. Records shall be maintained on a daily basis and shall include the following coating information: 1) Specific coating used and the mix ratio of components added to the coating material prior to application; 2) Volume of coatings applied (gallons); 3) Specific solvents, catalysts, and thinners used; 4) Volume of each solvent, catalyst, and thinner (gallons) used. [District Rule 4604] Federally Enforceable Through Title V Permit
36. Records shall be maintained on a daily basis and shall include the following solvent information: 1) Name of cleaning solvent used; 2) When the solvent is a mixture of different materials that are blended by the operator, the mix ratio of the batch; 3) Volume of each cleaning solvent used (gallons); 4) The type of cleaning activity for each solvent. [District Rule 4604] Federally Enforceable Through Title V Permit
37. Permittee shall maintain daily records of the temperature in the afterburner chamber which will demonstrate continuous operation and compliance of the emission control system during periods of emission-producing activities. [District Rule 4604 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
38. All records shall be maintained on site for a period of at least five years and shall be made available for District inspection upon request. [District Rules 1070, 2520, 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
39. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR part 64.7. [40 CFR Part 64] Federally Enforceable Through Title V Permit
40. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR Part 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64.8. [40 CFR Part 64] Federally Enforceable Through Title V Permit
41. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR Part 64.9. [40 CFR Part 64] Federally Enforceable Through Title V Permit

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1330-8-1

EXPIRATION DATE: 09/30/2014

EQUIPMENT DESCRIPTION:
5 MMBTU/HR WICKET OVEN SERVED BY A FUME INCINERATOR

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PERMIT UNIT REQUIREMENTS

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2080] Federally Enforceable Through Title V Permit
2. The fume incinerator shall be preheated prior to operating the paint bake oven. [District Rule 2080] Federally Enforceable Through Title V Permit
3. The paint baking oven shall not be operated without the simultaneous operation of the fume incinerator. [District Rule 2080] Federally Enforceable Through Title V Permit
4. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] 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-1330-9-1

EXPIRATION DATE: 09/30/2014

EQUIPMENT DESCRIPTION:

5.1 MMBTU/HR DEVILBISS PAINT BAKE OVEN SERVED BY A FUME INCINERATOR

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PERMIT UNIT REQUIREMENTS

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2080] Federally Enforceable Through Title V Permit
2. The fume incinerator shall be preheated prior to operating the paint bake oven. [District Rule 2080] Federally Enforceable Through Title V Permit
3. The paint baking oven shall not be operated without the simultaneous operation of the fume incinerator. [District Rule 2080] Federally Enforceable Through Title V Permit
4. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit

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

DRAFT

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1330-10-1

EXPIRATION DATE: 09/30/2014

EQUIPMENT DESCRIPTION:

3.9 MMBTU/HR BLU SURF PAINT BAKE OVEN SERVED BY A FUME INCINERATOR

DRAFT

PERMIT UNIT REQUIREMENTS

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2080] Federally Enforceable Through Title V Permit
2. The fume incinerator shall be preheated prior to operating the paint bake oven. [District Rule 2080] Federally Enforceable Through Title V Permit
3. The paint baking oven shall not be operated without the simultaneous operation of the fume incinerator. [District Rule 2080] Federally Enforceable Through Title V Permit
4. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit

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

DRAFT

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1330-12-1

EXPIRATION DATE: 09/30/2014

EQUIPMENT DESCRIPTION:
ELECTRO PLATING OPERATION SERVED BY A FUME SCRUBBER

DRAFT

PERMIT UNIT REQUIREMENTS

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2080] Federally Enforceable Through Title V Permit
2. Electroplating tank shall not be used without the simultaneous operation of the fume scrubber. [District Rule 2080] Federally Enforceable Through Title V Permit

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

DRAFT

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1330-15-2

EXPIRATION DATE: 09/30/2014

EQUIPMENT DESCRIPTION:

8.4 MMBTU/HR HURST MODEL S4-200-150 BOILER WITH AN INDUSTRIAL COMBUSTION LOW NOX BURNER AND INDUCED FLUE GAS RECIRCULATION

PERMIT UNIT REQUIREMENTS

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
3. The unit shall only be fired on PUC-regulated natural gas. [District Rules 2201, 4320 and 4801] Federally Enforceable Through Title V Permit
4. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of natural gas combusted in the unit shall be installed, utilized and maintained. [District Rules 2201, 4305, and 4306] Federally Enforceable Through Title V Permit
5. Maximum annual heat input of the unit shall not exceed 30 billion Btu per calendar year. [District Rules 2201, 4305 and 4306] Federally Enforceable Through Title V Permit
6. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NOx emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NOx emission limit listed in Rule 4320. [District Rule 4320] Federally Enforceable Through Title V Permit
7. Emissions rates from the natural gas-fired unit shall not exceed any of the following limits: 30 ppmv NOx @ 3% O2 or 0.036 lb-NOx/MMBtu, 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 100 ppmv CO @ 3% O2 or 0.073 lb-CO/MMBtu, or 10 ppmv @ 3% O2 0.0042 lb-VOC/MMBtu. [District Rules 2201, 4301, 4305, and 4306] Federally Enforceable Through Title V Permit
8. The flue gas recirculation valve(s) setting shall be monitored at least on a weekly basis. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last week. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
9. The acceptable settings for the flue gas recirculation valve(s) shall be established by source testing this unit or other representative units per Rule 4305 and as approved by the District. The normal range/level shall be that for which compliance with applicable NOx and CO emissions rates have been demonstrated through source testing at a similar firing rate. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
10. Normal range or level for the flue gas recirculation valve(s) settings shall be re-established during each source test required by this permit. [District Rules 4305 and 4306] 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.

11. If the flue gas recirculation valve(s) setting is less than the normal range/level, the permittee shall return the flue gas recirculation valve(s) setting to the normal range/level as soon as possible, but no longer than 1 hour of operation after detection. If the flue gas recirculation valve(s) setting is not returned to the normal range/level within 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour, and conduct a source test within 60 days of the first exceedance, to demonstrate compliance with the applicable emission limits at the new flue gas recirculation valve(s) setting. A District-approved portable analyzer may be used in lieu of a source test to demonstrate compliance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
12. The permittee shall maintain records of the date and time of flue gas recirculation valve(s) settings, the observed setting, and the firing rate at the time of the flue gas recirculation valve(s) setting measurements. The records must also include a description of any corrective action taken to maintain the flue gas recirculation valve(s) setting within the acceptable range. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
13. During the 36-month source testing interval, the owner/operator shall have unit tuned at least twice each calendar year, from four to eight months apart, in which it operates, by a technician that is qualified, to the satisfaction of the APCO, in accordance with the procedure described in Rule 4304 (Equipment Tuning Procedure for Boilers, Steam Generators, and Process Heaters). [District Rule 4306] Federally Enforceable Through Title V Permit
14. If the unit does not operate throughout a continuous six-month period within a calendar year, only one tune-up is required for that calendar year. No tune-up is required for any unit that is not operated during that calendar year; this unit may be test fired to verify availability of the unit for its intended use, but once the test firing is completed the unit shall be shutdown. [District Rule 4306] Federally Enforceable Through Title V Permit
15. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
16. Source testing to measure natural gas-combustion NO_x and CO emissions from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
17. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
18. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
19. NO_x emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
20. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
21. Stack gas oxygen (O₂) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
22. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305 and 4306] 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.

23. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
24. On and after January 1, 2014, the permittee shall submit an analysis showing the fuel's sulfur content at least once every year. Valid purchase contracts, supplier certifications, tariff sheets, or transportation contracts may be used to satisfy this requirement, provided they establish the fuel parameters mentioned above. [District Rule 4320] Federally Enforceable Through Title V Permit
25. Records of monthly and annual heat input of the unit shall be maintained. [District Rules 2201, 4305, and 4306] Federally Enforceable Through Title V Permit
26. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, and 4306] Federally Enforceable Through Title V Permit
27. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 4320] Federally Enforceable Through Title V Permit
28. Permittee shall determine sulfur content of combusted gas annually or shall demonstrate that the combusted gas is provided from a PUC or FERC regulated source. [District Rules 1081 and 4320]

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

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Attachment A

Detail Facility Printout

Detailed Facility Report
For Facility=1330 and excluding Deleted Permits
Sorted by Facility Name and Permit Number

GREIF INDUSTRIAL PACKAGING & SERVS LLC 2400 COOPER AVE MERCED, CA 95344	FAC # STATUS: TELEPHONE:	N 1330 A 7406576520	TYPE: TOXIC ID:	TitleV 31	EXPIRE ON: AREA: INSP. DATE:	09/30/2014 71 06/13
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PERMIT NUMBER	FEE DESCRIPTION	FEE RULE	QTY	FEE AMOUNT	FEE TOTAL	PERMIT STATUS	EQUIPMENT DESCRIPTION
N-1330-2-1	10 HP	3020-01 A	1	87.00	87.00	A	CAN AND COIL COATING OPERATION CONSISTING OF A HEAD AND BOTTOM PART INTERIOR COATING BOOTH
N-1330-3-0	10 HP	3020-01 A	1	87.00	87.00	A	CAN AND COIL COATING OPERATION CONSISTING OF A BINKS EXTERIOR BODY BOOTH
N-1330-4-0	5 HP	3020-01 A	1	87.00	87.00	A	CAN AND COIL COATING OPERATION CONSISTING OF CENTRIFUGAL COATER (#2) AND RHEEM DESIGN BOOTH
N-1330-5-0	3.5 HP	3020-01 A	1	87.00	87.00	A	CAN AND COIL COATING OPERATION CONSISTING OF CENTRIFUGAL COATER (#1)
N-1330-6-1	10 HP	3020-01 A	1	87.00	87.00	A	CAN AND COIL COATING OPERATION CONSISTING OF AN EXTERIOR HEAD PARTS COATING BOOTH
N-1330-7-4	15,100 KBTU/HR	3020-02 H	1	1,030.00	1,030.00	A	SHEET ROLL COATER SYSTEM CONSISTING OF A WAGNER ROLL COAT MACHINE WITH A VOC CAPTURE ENCLOSURE AND A 12.5 MMBTU/HR WAGNER PAINT CURING OVEN WITH A 2.6 MMBTU/HR JO ROSS ENGINEERING DIRECT FLAME AFTERBURNER
N-1330-8-0	5,000 KBTU	3020-02 G	1	815.00	815.00	A	5 MMBTU/HR WICKET OVEN SERVED BY A FUME INCINERATOR
N-1330-9-0	5,100 KBTU	3020-02 G	1	815.00	815.00	A	5.1 MMBTU/HR DEVILBISS PAINT BAKE OVEN SERVED BY A FUME INCINERATOR
N-1330-10-0	3,900 KBTU	3020-02 F	1	607.00	607.00	A	3.9 MMBTU/HR BLU SURF PAINT BAKE OVEN SERVED BY A FUME INCINERATOR
N-1330-12-0	170 HP	3020-01 D	1	314.00	314.00	A	ELECTRO PLATING OPERATION SERVED BY A FUME SCRUBBER
N-1330-15-1	8,400 KBTU/hr boiler	3020-02 G	1	815.00	815.00	A	8.4 MMBTU/HR HURST MODEL S4-200-150 BOILER WITH AN INDUSTRIAL COMBUSTION LOW NOX BURNER AND INDUCED FLUE GAS RECIRCULATION

Number of Facilities Reported: 1

Attachment B

Insignificant Activities

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

COMPANY NAME: **GREIF PACKAGING LLC**

FACILITY ID: **N - 1330**

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	✓
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	✓
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	✓	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	✓	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	✓
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	✓
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	✓	Emissions less than 2 lb/day from units not included above	6.19	✓
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	

No insignificant activities (Check this box if no equipment in the above categories exist at your facility.)

Attachment C

SJVUAPCD Permits



San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT



HEALTHY AIR LIVING™

Permit to Operate

FACILITY: N-1330

EXPIRATION DATE: 09/30/2014

LEGAL OWNER OR OPERATOR:

GREIF INDUSTRIAL PACKAGING & SERVS LLC

MAILING ADDRESS:

P O BOX 2146
MERCED, CA 95344

FACILITY LOCATION:

2400 COOPER AVE
MERCED, CA 95344

FACILITY DESCRIPTION:

CAN COATING

The Facility's Permit to Operate may include Facility-wide Requirements as well as requirements that apply to specific permit units.

This Permit to Operate remains valid through the permit expiration date listed above, subject to payment of annual permit fees and compliance with permit conditions and all applicable local, state, and federal regulations. This permit is valid only at the location specified above, and becomes void upon any transfer of ownership or location. Any modification of the equipment or operation, as defined in District Rule 2201, will require prior District approval. This permit shall be posted as prescribed in District Rule 2010.

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Executive Director / APCO

David Warner

Director of Permit Services

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1330-2-1

EXPIRATION DATE: 09/30/2014

EQUIPMENT DESCRIPTION:

CAN AND COIL COATING OPERATION CONSISTING OF A HEAD AND BOTTOM PART INTERIOR COATING BOOTH

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. Exhaust fans shall be switched on prior to the start of paint spraying operations. [District Rule 2201]
3. All filters shall be properly maintained and must be in place during the painting operation. [District Rule 2201]
4. The coating operation shall comply with Rule 4604 (Can and Coil Coating Operations). [District Rule 4604]
5. Closed, non-absorbent containers shall be used for storage and disposal of all solvent-laden cloth or paper. [District Rule 4604]
6. All coatings and solvents shall be stored in closed containers. [District Rule 4604]
7. The particulate matter emissions from the stack of the paint spray booth shall not exceed 0.1 gr/scf and there shall be no visible emissions. [District Rule 2201 and District Rule 4201]
8. The VOC content (as applied), of all coatings shall comply with the limits of Rule 4604 (Can and Coil Coating Operations). [District Rule 4604]
9. The VOC emissions shall not exceed 26.4 pounds per day. [District Rule 2201]
10. The VOC emissions shall not exceed 235 pounds in the first quarter, 1134 pounds in the second quarter, 1742 pounds in the third quarter and 571 pounds in the fourth quarter. [District Rule 2201]
11. Records shall be kept in accordance with Rule 4604 (Can and Coil Coating Operations). [District Rule 4604]
12. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rule 1070]

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1330-3-0

EXPIRATION DATE: 09/30/2014

EQUIPMENT DESCRIPTION:

CAN AND COIL COATING OPERATION CONSISTING OF A BINKS EXTERIOR BODY BOOTH

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 coating operation shall comply with Rule 4604 (Can and Coil Coating Operations). [District Rule 4604]
4. Records shall be kept in accordance with Rule 4604 (Can and Coil Coating Operations). [District Rule 4604]
5. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rule 1070]

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1330-4-0

EXPIRATION DATE: 09/30/2014

EQUIPMENT DESCRIPTION:

CAN AND COIL COATING OPERATION CONSISTING OF CENTRIFUGAL COATER (#2) AND RHEEM DESIGN BOOTH

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 coating operation shall comply with Rule 4604 (Can and Coil Coating Operations). [District Rule 4604]
4. Records shall be kept in accordance with Rule 4604 (Can and Coil Coating Operations). [District Rule 4604]
5. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rule 1070]

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1330-5-0

EXPIRATION DATE: 09/30/2014

EQUIPMENT DESCRIPTION:

CAN AND COIL COATING OPERATION CONSISTING OF CENTRIFUGAL COATER (#1)

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 coating operation shall comply with Rule 4604 (Can and Coil Coating Operations). [District Rule 4604]
4. Records shall be kept in accordance with Rule 4604 (Can and Coil Coating Operations). [District Rule 4604]
5. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rule 1070]

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1330-6-1

EXPIRATION DATE: 09/30/2014

EQUIPMENT DESCRIPTION:

CAN AND COIL COATING OPERATION CONSISTING OF AN EXTERIOR HEAD PARTS COATING BOOTH

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. All filters shall be properly maintained and must be in place during the painting operation. [District Rule 2201]
3. Exhaust fans shall be switched on prior to the start of paint spraying operations. [District Rule 2201]
4. The coating operation shall comply with Rule 4604 (Can and Coil Coating Operations). [District Rule 4604]
5. Closed, non-absorbent containers shall be used for storage and disposal of all solvent-laden cloth or paper. [District Rule 4604]
6. All coatings and solvents shall be stored in closed containers. [District Rule 4604]
7. The VOC content (as applied), of all coatings shall comply with the limits of Rule 4604 (Can and Coil Coating Operations). [District Rule 4604]
8. The particulate matter emissions from the stack of the paint spray booth shall not exceed 0.1 gr/scf and there shall be no visible emissions. [District Rule 2201 and District Rule 4201]
9. The VOC emissions shall not exceed 12.9 pounds per day. [District Rule 2201]
10. The VOC emissions shall not exceed 32 pounds in the first quarter, 478 pounds in the second quarter, 853 pounds in the third quarter and 44 pounds in the fourth quarter. [District Rule 2201]
11. Records shall be kept in accordance with Rule 4604 (Can and Coil Coating Operations). [District Rule 4604]
12. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rule 1070]

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1330-7-4

EXPIRATION DATE: 09/30/2014

EQUIPMENT DESCRIPTION:

SHEET ROLL COATER SYSTEM CONSISTING OF A WAGNER ROLL COAT MACHINE WITH A VOC CAPTURE ENCLOSURE AND A 12.5 MMBTU/HR WAGNER PAINT CURING OVEN WITH A 2.6 MMBTU/HR JO ROSS ENGINEERING DIRECT FLAME AFTERBURNER

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. A continuous recording device shall be installed on the afterburner chamber indicating the temperature at the end of the afterburner chamber. [District Rule 2201]
3. The afterburner chamber shall be preheated to 1,250 degrees Fahrenheit prior to the introduction of VOC contaminated gases into the paint curing oven serving the roll coating system. [District Rule 2201]
4. The afterburner chamber must be maintained at or above 1,250 degrees Fahrenheit during the entire operation of the roll coating system. [District Rule 2201]
5. The coating operation shall comply with Rule 4604 (Can and Coil Coating Systems). [District Rule 4604]
6. All coatings and solvents shall be stored in closed containers. [District Rule 4604]
7. The paint curing oven and afterburner shall be fired exclusively on natural gas. [District Rule 2201]
8. The destruction efficiency of the afterburner, for VOC emissions from the roll coating system, shall not be less than 95% by weight. [District Rule 2201]
9. The overall control efficiency, for the capture and destruction of VOC emissions from the entire roll coating system, shall not be less than 90% by weight. [District Rule 2201]
10. 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]
11. Particulate matter emissions from any combustion source shall not exceed 0.1 grains/dscf (calculated to 12% carbon dioxide). [District Rule 4301]
12. The PM10 emissions rate from the roll coating system shall not exceed 12.0 pounds in any one day. [District Rule 2201]
13. The SOx emissions rate from the roll coating system shall not exceed 0.8 pounds in any one day. [District Rule 2201]
14. The NOx emissions rate from the roll coating system shall not exceed 50.7 pounds in any one day. [District Rule 2201]
15. The CO emissions rate from the roll coating system shall not exceed 520.0 pounds in any one day. [District Rule 2201]
16. The VOC emissions rate from the roll coating system shall not exceed 76.6 pounds in any one day. [District Rule 2201]
17. The total NOx emissions from the curing oven and afterburner of the roll coating system shall not exceed: 3,245 pounds in the 1st quarter, 3,296 pounds in the 2nd quarter, 3,346 pounds in the 3rd quarter, and 3,346 pounds in the 4th quarter. [District Rule 2201]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

18. The total VOC emissions from the roll coating system shall not exceed: 1,920 pounds in the 1st quarter, 4,387 pounds in the 2nd quarter, 5,056 pounds in the 3rd quarter, and 2,893 pounds in the 4th quarter. [District Rule 2201]
19. Source testing to demonstrate compliance with the destruction efficiency of the VOC control system (afterburner) and the daily VOC emission rate shall be conducted on an annual basis. [District Rule 2201]
20. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081]
21. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081]
22. Source testing to determine the destruction efficiency of the VOC control system (afterburner) and daily VOC emission rate shall be conducted using EPA or CARB Methods 1, 2, 3, or 4 for measuring flow rates and EPA Methods 25, 25A, or 25C for measuring VOC emissions and CARB Method 100 for measuring total gaseous organic concentrations at the inlet and outlet of the control device. [District Rule 2201 & 4604]
23. Records shall be kept in accordance with Rule 4604 (Can and Coil Coating Operations). [District Rule 4604]
24. Maintain a daily record of the volume of coatings and solvents applied, the VOC content of coatings as applied, and the total quantity of VOC emitted in pounds. [District Rule 1070]
25. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rule 1070]

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1330-8-0

EXPIRATION DATE: 09/30/2014

EQUIPMENT DESCRIPTION:
5 MMBTU/HR WICKET OVEN SERVED BY A FUME INCINERATOR

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2080]
3. The fume incinerator shall be preheated prior to operating the paint bake oven. [District Rule 2080]
4. The paint baking oven shall not be operated without the simultaneous operation of the fume incinerator. [District Rule 2080]
5. 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]
6. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1330-9-0

EXPIRATION DATE: 09/30/2014

EQUIPMENT DESCRIPTION:

5.1 MMBTU/HR DEVILBISS PAINT BAKE OVEN SERVED BY A FUME INCINERATOR

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2080]
3. The fume incinerator shall be preheated prior to operating the paint bake oven. [District Rule 2080]
4. The paint baking oven shall not be operated without the simultaneous operation of the fume incinerator. [District Rule 2080]
5. 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]
6. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1330-10-0

EXPIRATION DATE: 09/30/2014

EQUIPMENT DESCRIPTION:

3.9 MMBTU/HR BLU SURF PAINT BAKE OVEN SERVED BY A FUME INCINERATOR

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2080]
3. The fume incinerator shall be preheated prior to operating the paint bake oven. [District Rule 2080]
4. The paint baking oven shall not be operated without the simultaneous operation of the fume incinerator. [District Rule 2080]
5. 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]
6. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]

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

Facility Name: GREIF INDUSTRIAL PACKAGING & SERVS LLC

Location: 2400 COOPER AVE, MERCED, CA 95344

N-1330-10-0: Sep 20 2012 2:23PM - GONZALEV

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1330-12-0

EXPIRATION DATE: 09/30/2014

EQUIPMENT DESCRIPTION:
ELECTRO PLATING OPERATION SERVED BY A FUME SCRUBBER

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2080]
3. Electroplating tank shall not be used without the simultaneous operation of the fume scrubber. [District Rule 2080]

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1330-15-1

EXPIRATION DATE: 09/30/2014

EQUIPMENT DESCRIPTION:

8.4 MMBTU/HR HURST MODEL S4-200-150 BOILER WITH AN INDUSTRIAL COMBUSTION LOW NOX BURNER AND INDUCED FLUE GAS RECIRCULATION

PERMIT UNIT REQUIREMENTS

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201]
2. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. 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]
4. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
5. The unit shall only be fired on PUC-regulated natural gas. [District Rule 2201]
6. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of natural gas combusted in the unit shall be installed, utilized and maintained. [District Rules 2201, 4305, and 4306]
7. Maximum annual heat input of the unit shall not exceed 30 billion Btu per calendar year. [District Rules 2201, 4305 and 4306]
8. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NO_x emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NO_x emission limit listed in Rule 4320. [District Rule 4320]
9. Emissions rates from the natural gas-fired unit shall not exceed any of the following limits: 30 ppmv NO_x @ 3% O₂ or 0.036 lb-NO_x/MMBtu, 0.00285 lb-SO_x/MMBtu, 0.0076 lb-PM₁₀/MMBtu, 100 ppmv CO @ 3% O₂ or 0.073 lb-CO/MMBtu, or 10 ppmv @ 3% O₂ 0.0042 lb-VOC/MMBtu. [District Rules 2201, 4305, and 4306]
10. The flue gas recirculation valve(s) setting shall be monitored at least on a weekly basis. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last week. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rules 4305 and 4306]
11. The acceptable settings for the flue gas recirculation valve(s) shall be established by source testing this unit or other representative units per Rule 4305 and as approved by the District. The normal range/level shall be that for which compliance with applicable NO_x and CO emissions rates have been demonstrated through source testing at a similar firing rate. [District Rules 4305 and 4306]
12. Normal range or level for the flue gas recirculation valve(s) settings shall be re-established during each source test required by this permit. [District Rules 4305 and 4306]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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13. If the flue gas recirculation valve(s) setting is less than the normal range/level, the permittee shall return the flue gas recirculation valve(s) setting to the normal range/level as soon as possible, but no longer than 1 hour of operation after detection. If the flue gas recirculation valve(s) setting is not returned to the normal range/level within 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour, and conduct a source test within 60 days of the first exceedance, to demonstrate compliance with the applicable emission limits at the new flue gas recirculation valve(s) setting. A District-approved portable analyzer may be used in lieu of a source test to demonstrate compliance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305 and 4306]
14. The permittee shall maintain records of the date and time of flue gas recirculation valve(s) settings, the observed setting, and the firing rate at the time of the flue gas recirculation valve(s) setting measurements. The records must also include a description of any corrective action taken to maintain the flue gas recirculation valve(s) setting within the acceptable range. [District Rules 4305 and 4306]
15. During the 36-month source testing interval, the owner/operator shall have unit tuned at least twice each calendar year, from four to eight months apart, in which it operates, by a technician that is qualified, to the satisfaction of the APCO, in accordance with the procedure described in Rule 4304 (Equipment Tuning Procedure for Boilers, Steam Generators, and Process Heaters). [District Rule 4306]
16. If the unit does not operate throughout a continuous six-month period within a calendar year, only one tune-up is required for that calendar year. No tune-up is required for any unit that is not operated during that calendar year; this unit may be test fired to verify availability of the unit for its intended use, but once the test firing is completed the unit shall be shutdown. [District Rule 4306]
17. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305 and 4306]
18. Source testing to measure natural gas-combustion NO_x and CO emissions from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305 and 4306]
19. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305 and 4306]
20. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081]
21. NO_x emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305 and 4306]
22. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305 and 4306]
23. Stack gas oxygen (O₂) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305 and 4306]
24. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305 and 4306]
25. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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26. On and after January 1, 2014, the permittee shall submit an analysis showing the fuel's sulfur content at least once every year. Valid purchase contracts, supplier certifications, tariff sheets, or transportation contracts may be used to satisfy this requirement, provided they establish the fuel parameters mentioned above. [District Rule 4320]
27. Records of monthly and annual heat input of the unit shall be maintained. [District Rules 2201, 4305, and 4306]
28. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, and 4306]

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