

**TITLE V FEDERAL OPERATING PERMIT
AND
SMAQMD RULE 201 PERMIT TO OPERATE**

TITLE V PERMIT NO:
TV2010-15-01

ISSUED TO:
Silgan Can Company
6200 Franklin Boulevard, Suite 100
Sacramento, CA 95824

FACILITY LOCATION:
Silgan Can Company
6200 Franklin Boulevard, Suite 100
Sacramento, CA

DATE PERMIT ISSUED:
August 29, 2011

DATE PERMIT EXPIRES:
August 29, 2016

PERMIT REVISION HISTORY:
TV2005-15-01 August 29, 2011 2nd Renewal

RESPONSIBLE OFFICIAL:
James Moses
Plant Manager
(916) 399-2585

CONTACT PERSON:
James Moses
Plant Manager
(916) 399-2585

NATURE OF BUSINESS:
Manufacturing Steel Cans

**STANDARD INDUSTRIAL
CLASSIFICATION (SIC):**
3411

Larry Greene
Air Pollution Control Officer

By: _____
Lauren Dickerson
Air Quality Engineer

TABLE OF CONTENTS

| | |
|---|----|
| PERMIT SUMMARY | 3 |
| FACILITY DESCRIPTION | 5 |
| FEDERALLY ENFORCEABLE GENERAL REQUIREMENTS | |
| Title V Permit Modifications and Renewal | 7 |
| Permit Compliance | 8 |
| Reports and Recordkeeping | 9 |
| Ringelmann Chart | 11 |
| Particulate Matter | 11 |
| Sulfur Compounds | 12 |
| Architectural Coating and Solvent Cleaning | 12 |
| Compliance | 13 |
| Equipment Breakdowns | 13 |
| Payment of Fees | 13 |
| Accidental Releases | 14 |
| Title VI Requirements (Ozone Depleting Substances) | 14 |
| Permit Shield | 15 |
| LOCAL (NON-FEDERALLY ENFORCEABLE) GENERAL REQUIREMENTS | |
| Applicability | 16 |
| Local Permit Renewal | 16 |
| General | 16 |
| Equipment Operation | 17 |
| Equipment Breakdowns | 17 |
| Architectural Coatings | 19 |
| EQUIPMENT-SPECIFIC REQUIREMENTS | |
| Drawn and Ironed Can Manufacturing Line (SMAQMD Rule 201 Permit No. 22883) | |
| Washcoat Oven (SMAQMD Rule 201 Permit No. 13712) | |
| Inside Bake Oven (SMAQMD Rule 201 Permit No. 13713) | |
| Thermal Oxidizer (SMAQMD Rule 201 Permit No. 22884) | |
| A. Equipment Description | 20 |
| B. Applicable Federally Enforceable Requirements - Equipment Specific | 21 |
| INSIGNIFICANT EMISSION UNITS | 30 |
| ACRONYMS, ABBREVIATIONS AND UNITS OF MEASURE | 33 |

PERMIT SUMMARY

This permit shall serve as a conditional Permit to Operate pursuant to SMAQMD Rule 201 (General Permit Requirements) and SMAQMD Rule 207 (Title V - Federal Operating Permit Program). Requirements identified in the permit as non-federally enforceable are not enforceable by U.S. EPA. However, they are enforceable by the Sacramento Metropolitan Air Quality Management District (SMAQMD)

Your application for this air quality Permit to Operate was evaluated for compliance with SMAQMD, State, and Federal air quality rules and regulations. The following listed rules are those that were found to be applicable at the time of permit review, based on the information submitted with the Title V permit application.

| Citation | Description | Rule Adoption Date | Federally Enforceable ? |
|-----------------|---|--------------------|-------------------------------|
| SMAQMD Rule 101 | General Provisions and Definitions | 09-03-1998 | Yes |
| SMAQMD Rule 102 | Circumvention | 11-29-1983 | Yes |
| SMAQMD Rule 108 | Minor Violation | 10-01-1998 | No |
| SMAQMD Rule 201 | General Permit Requirements (SIP approved) | 11-20-1984 | Yes |
| SMAQMD Rule 201 | General Permit Requirements (not SIP approved) | 04-26-2001 | No |
| SMAQMD Rule 202 | New Source Review (SIP approved) | 11-20-1984 | Yes |
| SMAQMD Rule 202 | New Source Review (not SIP approved) | 02-24-2005 | No |
| SMAQMD Rule 207 | Title V - Federal Operating Permit Program (not SIP approved but rule is applicable as part of U.S. EPA approval of the SMAQMD Title V program) | 04-26-2001 | Yes |
| SMAQMD Rule 301 | Permit Fees - Stationary Source (not SIP approved but Title V fees in rule applicable as part of U.S. EPA approval of the SMAQMD Title V program) | 10-27-2005 | Yes (Title V provisions only) |
| SMAQMD Rule 307 | Clean Air Act Fees | 09-26-2002 | Yes |
| SMAQMD Rule 401 | Ringelmann Chart | 04-19-1983 | Yes |
| SMAQMD Rule 402 | Nuisance | 08-03-1977 | No |
| SMAQMD Rule 403 | Fugitive Dust | 11-29-1983 | Yes |
| SMAQMD Rule 404 | Particulate Matter | 11-20-1984 | Yes |
| SMAQMD Rule 406 | Specific Contaminants | 11-29-1983 | Yes |
| SMAQMD Rule 407 | Open Burning | 11-29-1983 | Yes |
| SMAQMD Rule 414 | Natural Gas Fired Water Heaters | 08-01-1996 | Yes |
| SMAQMD Rule 420 | Sulfur Content of Fuels | 11-29-1983 | Yes |
| SMAQMD Rule 442 | Architectural Coatings (SIP approved) | 09-05-1996 | Yes |
| SMAQMD Rule 442 | Architectural Coatings (not SIP approved) | 05-24-2001 | No |

PERMIT SUMMARY (continued)

| Citation | Description | Rule Adoption Date | Federally Enforceable ? |
|-----------------|--|---------------------------|--------------------------------|
| SMAQMD Rule 451 | Surface Coating of Miscellaneous Metal Parts and Products (SIP approved) | 11-29-1983 | Yes |
| SMAQMD Rule 451 | Surface Coating of Miscellaneous Metal Parts and Products (not SIP approved) | 10-02-1997 | No |
| SMAQMD Rule 452 | Can Coating | 09-05-1996 | Yes |
| SMAQMD Rule 460 | Adhesives and Sealants (not SIP approved) | 11-30-2000 | No |
| SMAQMD Rule 466 | Solvent Cleaning (not SIP approved) | 05-23-2002 | No |
| SMAQMD Rule 601 | Procedure Before the Hearing Board (not SIP approved) | 02-05-1998 | No |
| SMAQMD Rule 602 | Breakdown Conditions: Emergency Variance (not SIP approved) | 11-29-1983 | No |

Future changes in prohibitory rules may establish more stringent requirements that may, at the SMAQMD level, supersede the conditions listed here. For Title V purposes however, the federally enforceable requirements are those found in the Title V permit. Federally enforceable provisions of the Title V permit do not change until the Title V permit is revised.

FACILITY DESCRIPTION

Permit Background

| <u>Permit Action</u> | <u>Date Issued</u> | <u>Federal Title V Operating Permit No.</u> |
|-------------------------------|--------------------|---|
| Initial Title V permit issued | 08-29-2001 | TV99-15-01 |
| 1st Administrative Amendment | 11-25-2002 | TV99-15-01A |
| 1st Minor Modification | 07-26-2005 | TV99-15-02 |
| 1st Permit Renewal | 08-29-2006 | TV2005-15-01 |
| 1st Administrative Amendment | 06-07-2010 | TV2005-15-01A |

Current Permitting Action

This permit action is the second renewal of the Title V Federal Operating Permit, TV2005-15-01, issued 08-29-2006 with a five year term and an expiration date of 08-29-2011.

This permit renewal will be assigned the permit number TV2010-15-01.

Facility Description

Silgan Can Company manufactures steel cans for the food canning industry. They purchased their Sacramento facility from Campbell Soup Company in June 1998. They are located on the same site as the Campbell Soup Supply Company, LLC and supply cans to the Campbell Soup Supply Company, LLC.

Silgan Can Company produces both two-piece and three-piece cans. The air pollutant emissions from three-piece can manufacturing have changed significantly from what they were when Campbell Soup was conducting the operation. The three-piece can manufacturing process no longer produces air pollutant emissions and is considered exempt equipment for this permit evaluation.

The two-piece can manufacturing process and related processes are described below.

Drawn and Ironed (D and I) Can Production:

The process of manufacturing Drawn and Ironed cans begins with the receipt of steel coil stock. The coil is unwound, fed through the lubricator, and finally the cupping press. The formed cups are fed to the bodymakers where, through a punch and ring assembly, the can body is formed by the draw and ironing technique with an integral bottom. Lubrication oils are applied to facilitate the mechanical action and act as a coolant. No significant emissions result from this first phase of the D and I can production.

Following this operation, the cans enter the trimmer where excess metal around the can rim is removed to give a uniform height to the can body. After trimming, the unfinished can is transported to the washer where the lubricator oils are removed. The can body is then treated by a flow coating application of a water borne enamel. After the flow coat application of the enamel, the enameled can body enters the wash coat oven.

FACILITY DESCRIPTION (continued)

After the oven, the can body goes to the flanger where the rim of the can body is flanged. The can then goes to the beader where concentric rings are impressed on the side wall of the can. From here the can body passes to the tester to approve the integrity of the container.

The next step of the process is to apply a water borne inside spray enamel to the inside can body. This coating is similar in composition to the washcoat enamel. This coating is applied in an enclosed machine, where overspray and solvent flash-off is captured and ducted to a thermal oxidizer. There are eight (8) spray machines at the Sacramento Facility. The cans are then conveyed in a covered conveyor to the inside bake oven.

Both ovens, the spray machine manifold, and the covered conveyor are vented to a 16,000 scfm thermal oxidizer which typically operates at 1500°F with a retention time of 1 second.

Drawn and Ironed Can Production Line

| Process Description | Source Description | Emission Type | Emission Point |
|------------------------------------|--------------------------------|---------------|------------------------|
| Drawn and Ironed Can Manufacturing | Outside Washcoat | Point | Coater Vent |
| | Washcoat Oven | Point | Thermal Oxidizer Stack |
| | Washcoat Process Fugitives | Fugitive | Building |
| | Inside Spray Machines | Point | Thermal Oxidizer Stack |
| | Inside Spray Process Fugitives | Fugitive | Building |
| | Covered Conveyor | Point | Thermal Oxidizer Stack |
| | Inside Bake Oven | Point | Thermal Oxidizer Stack |

Maintenance and Support Activities:

These activities are performed for the purpose of maintenance, repair and upkeep of the facility equipment and grounds. Examples of these types of activities include welding, degreasing, use of lubricants, forklift activity, architectural coating, grounds maintenance, vehicle traffic, work performed by contractors, etc. The facility exclusively uses solvents for cleanup and degreasing that do not contain reactive organic compounds (ROC) or halogenated compounds.

FEDERALLY ENFORCEABLE GENERAL REQUIREMENTS

TITLE V PERMIT MODIFICATIONS AND RENEWAL

1. The owner or operator of a stationary source shall submit to the SMAQMD Air Pollution Control Officer a complete Title V permit application for renewal no later than 12 months prior to the expiration date of the Title V permit.
[Basis: SMAQMD Rule 207 Section 301.4]
2. The owner or operator of a stationary source shall submit to the SMAQMD Air Pollution Control Officer a complete Title V permit application for Minor Title V permit modification. The application shall be submitted after receiving any required preconstruction permit from the SMAQMD and before commencing operation associated with the Minor Title V permit modification.
[Basis: SMAQMD Rule 207 Section 301.6]
3. The owner or operator of a stationary source shall submit to the SMAQMD Air Pollution Control Officer a complete Title V permit application for Significant Title V permit modification. The application shall not be submitted prior to receiving any required preconstruction permit from the SMAQMD but no later than 12 months after commencing an operation associated with the Significant Title V permit modification. Where an existing federally enforceable Title V permit condition would prohibit such change in operation or the stationary source is not required to obtain a preconstruction permit, the owner or operator must obtain a Title V permit modification before commencing operation.
[Basis: SMAQMD Rule 207 Section 301.7]
4. The applicant shall submit to the SMAQMD Air Pollution Control Officer timely updates to the Title V application as new applicable requirements become applicable to the source.
[Basis: SMAQMD Rule 207 Section 302.1]
5. The applicant shall submit to the SMAQMD Air Pollution Control Officer any additional information necessary to correct any incorrect information in the Title V permit application upon becoming aware of such incorrect submittal or if the applicant is notified by the SMAQMD Air Pollution Control Officer of such incorrect submittal.
[Basis: SMAQMD Rule 207 Section 302.2]
6. The applicant shall submit to the SMAQMD Air Pollution Control Officer any additional information relating to the Title V application within 30 days if such information is requested in writing by the SMAQMD Air Pollution Control Officer.
[Basis: SMAQMD Rule 207 Section 302.3]
7. Title V permit expiration terminates the stationary source's right to operate unless a timely and complete Title V permit application for renewal has been submitted and the stationary source complies with SMAQMD Rule 207 Sections 303.1(a), (b), (c), and (d), in which case the existing Title V permit will remain in effect until the Title V permit renewal has been issued or denied.
[Basis: SMAQMD Rule 207 Section 303.2]

FEDERALLY ENFORCEABLE GENERAL REQUIREMENTS

8. Any Title V application form, report, or compliance certification submitted pursuant to a federally enforceable requirement in this permit shall contain certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

[Basis: SMAQMD Rule 207 Section 304]

9. This Title V permit shall have a 5-year fixed term from the date of issuance. The Title V permit shall have a new 5-year fixed term from the date of final action on reopening if the responsible official chooses to submit to the SMAQMD a complete Title V application for renewal upon reopening of the Title V permit pursuant to Sections 411 or 412 of Rule 207, and the Title V permit is renewed according to the administrative procedures listed in Sections 401 through 408 of Rule 207.

[Basis: SMAQMD Rule 207 Section 306]

PERMIT COMPLIANCE

10. The permittee must comply with all conditions of the Title V permit.

[Basis: SMAQMD Rule 207 Section 305.1(k)(1)]

11. 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 Title V permit.

[Basis: SMAQMD Rule 207 Section 305.1(k)(2)]

12. This Title V permit may be modified, revoked, reopened, and reissued, or terminated for cause.

[Basis: SMAQMD Rule 207 Section 305.1(k)(3)]

13. The permittee shall furnish to the SMAQMD Air Pollution Control Officer, within a reasonable time, any information that the SMAQMD Air Pollution Control Officer may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit pursuant to SMAQMD Rule 207 Section 411, or to determine compliance with this Title V permit.

Upon request, the permittee shall also furnish to the SMAQMD Air Pollution Control Officer copies of records required to be kept by conditions of this permit or, for information claimed to be confidential, the permittee may furnish such records directly to the EPA along with a claim of confidentiality.

[Basis: SMAQMD Rule 207 Section 305.1(k)(4)]

14. Noncompliance with any federally enforceable requirement in this Title V permit is grounds for Title V permit termination, revocation and reissuance, modification, enforcement action, or denial of the Title V permit renewal application. Any violation of the Title V permit shall also be a violation of Rule 207.

[Basis: SMAQMD Rule 207 Section 305.1(k)(5)]

15. A pending Title V permit action (e.g. a proposed permit revision) or notification of anticipated noncompliance does not stay any permit condition.

[Basis: SMAQMD Rule 207 Section 305.1(k)(6)]

FEDERALLY ENFORCEABLE GENERAL REQUIREMENTS

16. This Title V permit does not convey any property rights of any sort, or any exclusive privilege.
[Basis: SMAQMD Rule 207 Section 305.1(k)(7)]
17. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the SMAQMD Air Pollution Control Officer or an authorized representative to perform all of the following:
- A. Enter upon the stationary source's premises where this source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
 - B. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this Title V permit;
 - C. Inspect at reasonable times, the stationary source, equipment (including monitoring and air pollution control equipment), practices and operations regulated or required under this Title V permit, and;
 - D. As authorized by the Federal Clean Air Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the Title V permit conditions or applicable federal requirements.
- [Basis: SMAQMD Rule 207 Section 413.1]**

REPORTS AND RECORDKEEPING

18. Monitoring Reports

- A. The permittee shall submit to the SMAQMD Air Pollution Control Officer at least once every six months, unless required more frequently by an applicable requirement, reports of all required monitoring.
- B. The reporting periods for this permit shall be for the six month periods January 1 through June 30 and July 1 through December 31. The reports shall be submitted by July 30 and January 30 of each year respectively.
- C. All instances of deviations from Title V permit conditions must be clearly identified in such reports. All required reports must be certified by the responsible official and shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

[Basis: SMAQMD Rule 207, Section 501.1]

FEDERALLY ENFORCEABLE GENERAL REQUIREMENTS

19. Compliance Reports

- A. The permittee shall submit to the SMAQMD Air Pollution Control Officer and U.S. EPA (Air-3, U.S. EPA, Region IX) on an annual basis, unless required more frequently by additional applicable federal requirements such as Section 114(a)(3) and 504(b) (42 U.S.C. Sections 7414(a)(3) and 7661c(b)) of the Federal Clean Air Act, a certification of compliance by the responsible official with all terms and conditions contained in the Title V permit, including emission limitations, standards and work practices.
- B. The reporting period for this permit shall be January 1 through December 31. The report shall be submitted by January 30 of each year.
- C. All required reports must be certified by the responsible official and shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.
- D. The compliance certification shall include the following:
 - i. The identification of each term or condition of the Title V permit that is the basis of the certification.
 - ii. The method(s) used for determining the compliance status of the source, currently and over the reporting period, and whether such method(s) provides continuous or intermittent data.
 - iii. The status of compliance with the terms and conditions of the Title V permit for the period covered by the certification, based on the method designated in Section D(ii) of this condition. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion occurred. An excursion shall mean a departure from an indicator range established for monitoring under this part, consistent with any averaging period specified for averaging the results of the monitoring.
 - iv. Such other facts as the SMAQMD Air Pollution Control Officer may require to determine the compliance status of the source.
 - v. In accordance with SMAQMD Rule 207 Section 305, a method for monitoring the compliance of the stationary source with its emissions limitations, standards and work practices.

[Basis: SMAQMD Rule 207 Section 413.4, 40 CFR 64, and 40 CFR 70.6(c)(5)(iii)]

- 20. The permittee shall report within 24 hours of detection any deviation from a federally enforceable Title V permit condition not attributable to an emergency. In order to fulfill the reporting requirement of this condition, the permittee shall notify the SMAQMD Air Pollution Control Officer by telephone followed by a written statement describing the nature of the deviation from the federally enforceable permit condition.

[Basis: SMAQMD Rule 207 Section 501.3]

FEDERALLY ENFORCEABLE GENERAL REQUIREMENTS

21. All monitoring data and support information required by a federally enforceable applicable requirement must be kept by the stationary source for a period of 5 years from the date of the monitoring sample, measurement, report or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the federally enforceable applicable requirement in the Title V permit.

[Basis: SMAQMD Rule 207 Section 502.3]

RINGELMANN CHART

22. Except as otherwise provided in SMAQMD Rule 401 Section 100, a person shall not discharge into the atmosphere from any single source of emission whatsoever any air contaminant, other than uncombined water vapor, for a period or periods aggregating more than three minutes in any one hour which is:

- A. As dark or darker in shade as that designated No. 1 on the Ringelmann Chart, as published by the United States Bureau of Mines, or
- B. Of such opacity as to obscure a human observer's view, or a certified calibrated in-stack opacity monitoring system to a degree equal to or greater than No. 1 on the Ringelmann Chart.

[Basis: SMAQMD Rule 401 Section 301]

PARTICULATE MATTER

23. A person shall take every reasonable precaution not to cause or allow the emissions of fugitive dust from being airborne beyond the property line from which the emission originates, from any construction, handling or storage activity, or any wrecking, excavation, grading, clearing of land or solid waste disposal operation. Reasonable precautions shall include, but are not limited to:

- A. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the construction of roadways or the clearing of land.
- B. Application of asphalt, oil, water, or suitable chemicals on dirt roads, materials stockpiles and other surfaces which can give rise to airborne dusts;
- C. Other means approved by the SMAQMD Air Pollution Control Officer.

[Basis: SMAQMD Rule 403 Section 301]

24. Except as otherwise provided in Condition 25, a person shall not discharge into the atmosphere from any source particulate matter in excess of 0.23 grams per dry standard cubic meter (0.1 grains per dry standard cubic foot).

[Basis: SMAQMD Rule 404 Section 301]

FEDERALLY ENFORCEABLE GENERAL REQUIREMENTS

25. A person shall not discharge into the atmosphere particulate matter from the burning of any kind of material containing carbon in a free or combined state, from any single source of emission whatsoever, combustion contaminants in any state or combination thereof exceeding in concentration at the point of discharge: 0.23 grams per dry standard cubic meter (0.1 grains per dry standard cubic foot) of gas calculated to 12% carbon dioxide (CO₂) at standard conditions.
[Basis: SMAQMD Rule 406 Section 302]

SULFUR COMPOUNDS

26. A person shall not discharge into the atmosphere from any single source of emission whatsoever sulfur compounds in any state or combination thereof exceeding in concentration at the point of discharge: sulfur compounds, calculated as sulfur dioxide (SO₂): 0.2% by volume.
[Basis: SMAQMD Rule 406 Section 301]
27. Except as otherwise provided in Section 110 of Rule 420, a person shall not burn any gaseous fuel containing sulfur compounds in excess of 1.14 grams per cubic meter (50 grains per 100 cubic feet) of gaseous fuel, calculated as hydrogen sulfide at standard conditions, or any liquid fuel or solid fuel having a sulfur content in excess of 0.5% by weight.
[Basis: SMAQMD Rule 420 Section 301]

ARCHITECTURAL COATING AND SOLVENT CLEANING

28. Any coating applied to stationary structures and their appurtenances, to mobile homes, to pavements, or to curbs, shall meet the requirements of SMAQMD Rule 442.
[Basis: SMAQMD Rule 442 (09-05-1996 version)]
29. All VOC-containing materials used for architectural coating, including clean-up, shall be stored in closed containers when not in use. In use includes, but is not limited to: being accessed, filled, emptied, maintained or repaired.
[Basis: SMAQMD Rule 442 Section 304 (09-05-1996 version)]
30. The permittee shall comply with the requirements of SMAQMD Rule 466 Solvent Cleaning when using volatile organic compounds for the cleanup of architectural coating application equipment or for other applications of solvent cleaning at the facility.
[Basis: SMAQMD Rule 466 (10-28-2010 version, submitted to EPA pending approval)]
31. The permittee shall keep a record of all architectural coatings purchased that are not clearly labeled as complying with the VOC content limits contained in SMAQMD Rule 442. Compliance in these cases can be determined by maintaining records of the manufacturer's certifications or by Material Safety Data Sheets (MSDS) that demonstrate compliance with the VOC limits of SMAQMD Rule 442.
[Basis: SMAQMD Rule 442 (09-05-1996 version)]

FEDERALLY ENFORCEABLE GENERAL REQUIREMENTS

COMPLIANCE

32. Compliance with the conditions of the Title V permit shall be deemed compliance with all applicable requirements identified in the Title V permit.

[Basis: SMAQMD Rule 207 Section 307]

EQUIPMENT BREAKDOWNS

33. An emergency constitutes an affirmative defense to an action brought for noncompliance with technology based emission limitations if the following conditions are met:

A. The affirmative defense of an emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

- I. An emergency occurred and that the permittee can identify the cause(s) of the emergency;
- II. The permitted facility was at the time being properly operated;
- III. During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the Title V permit;
- IV. The permittee submitted notice of the emergency to the SMAQMD Air Pollution Control Officer within two working days of the time when emissions limitations were exceeded due to the emergency. The notice must contain a description of the emergency, and corrective actions taken.

B. In any enforcement proceedings, the permittee seeking to establish the occurrence of an emergency has the burden of proof.

[Basis: SMAQMD Rule 207 Section 414]

34. The permittee must notify the SMAQMD Air Pollution Control Officer of any occurrence which constitutes an emergency as defined in SMAQMD Rule 207 Section 212 as soon as reasonably possible, but no later than one hour after its detection. If the emergency occurs when the SMAQMD Air Pollution Control Officer cannot be contacted, their report of the emergency shall be made at the commencement of the next regular working day. The notification shall identify the time, specific location, equipment involved and to the extent known the cause(s) of the occurrence.

[Basis: SMAQMD Rule 207 Section 501.2]

PAYMENT OF FEES

35. The fee for (1) the issuance of an initial Title V operating permit, (2) the renewal and/or inspection of a Title V operating permit, (3) the modification of a Title V operating permit or (4) an administrative Title V permit amendment shall be based on the actual hours spent by the SMAQMD staff in evaluating the application and processing the operating permit. The fee shall be assessed in accordance with the hourly rate established in SMAQMD Rule 301 Section 308.12.

[Basis: SMAQMD Rule 207 Section 305.7 and Rule 301 Section 313]

FEDERALLY ENFORCEABLE GENERAL REQUIREMENTS

36. After the provisions for granting permits as set forth in SMAQMD Rule 207 have been complied with, the permittee will be notified by mail of the fee due and payable and the date the fee is due. If the fee is not paid by the specified due date, the fee shall be increased by one half the amount and the applicant/permittee shall be notified by mail of the increased fee. If the increased fee is not paid within 30 days after notice, the application/permit will be canceled/revoked and the applicant/permittee will be notified by mail.

[Basis: SMAQMD Rule 207 Section 305.7]

ACCIDENTAL RELEASES

37. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall register and submit to the U.S. EPA the required data related to the risk management plan (RMP) for reducing the probability of accidental releases of any regulated substances listed pursuant to Section 112(r)(3) of the CAA as amended in 40 CFR 68.130. The list of substances, threshold quantities and accident prevention regulations promulgated under 40 CFR Part 68 do not limit in any way the general duty provisions under Section 112(r)(1).

[Basis: 40 CFR Part 68]

38. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall comply with the requirements of 40 CFR Part 68 no later than the latest of the following dates as provided in 40 CFR Part 68.10(a):

A. June 21, 1999,

B. Three years after the date on which a regulated substance is first listed under 40 CFR Part 68.130, or

C. The date on which a regulated substance is first present above a threshold quantity in a process.

[Basis: 40 CFR Part 68]

39. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall submit any additional relevant information requested by any regulatory agency necessary to ensure compliance with the requirements of 40 CFR Part 68.

[Basis: 40 CFR Part 68]

40. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall annually certify compliance with all applicable requirements of Section 112(r) as part of the annual compliance certification as required by SMAQMD Rule 207 Section 413.4.

[Basis: 40 CFR Part 68]

TITLE VI REQUIREMENTS (OZONE DEPLETING SUBSTANCES)

41. Persons opening appliances containing CFCs for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR Part 82.156.

[Basis: 40 CFR Part 82 Subpart F]

FEDERALLY ENFORCEABLE GENERAL REQUIREMENTS

42. Equipment used during the maintenance, service, repair, or disposal of appliances containing CFCs must comply with the standards for recycling and recovery equipment pursuant to 40 CFR Part 82.158.

[Basis: 40 CFR Part 82 Subpart F]

43. Persons performing maintenance, service, repair or disposal of appliances containing CFCs must be certified by an approved technician certification program pursuant to 40 CFR Part 82.161.

[Basis: 40 CFR Part 82 Subpart F]

PERMIT SHIELD

44. Tooling changes necessary to produce cans with different diameters and heights shall not be considered an equipment modification pursuant to SMAQMD Rule 202 Section 222 and shall not trigger New Source Review.

[Basis: SMAQMD Rule 202 Section 222 and SMAQMD Rule 207 Section 307]

LOCAL (NON-FEDERALLY ENFORCEABLE) GENERAL REQUIREMENTS

APPLICABILITY:

1. The requirements outlined in this section pertain to the SMAQMD Rule 201 Permit to Operate and are not part of the Title V permit.

LOCAL PERMIT RENEWAL:

2. Permits to Operate issued to Silgan Can Company, pursuant to Rule 201 (non-Title V Permits to Operate), shall be renewed annually on February 24 and upon payment of the permit renewal fee established pursuant to SMAQMD Rule 301.
3. The SMAQMD Air Pollution Control Officer shall review every SMAQMD Rule 201 Permit to Operate upon annual renewal, pursuant to California Health and Safety Code Section 42301(c), to determine that permit conditions are adequate to ensure compliance with, and the enforceability of, SMAQMD rules and regulations applicable to the article, machine, equipment or contrivance for which the permit was issued. Applicable SMAQMD rules and regulations shall include those which were in effect at the time the permit was issued or modified, or which have subsequently been adopted and made retroactively applicable to an existing article, machine, equipment or contrivance, by the SMAQMD Board of Directors. The SMAQMD Air Pollution Control Officer shall revise the conditions, if such conditions are not consistent, in accordance with all applicable rules and regulations.

GENERAL

4. The SMAQMD Air Pollution Control Officer and/or authorized representatives, upon the presentation of credentials shall be permitted:
 - A. To enter upon the premises where the source is located or in which any records are required to be kept under the terms and conditions of this permit to operate, and
 - B. At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this Permit to Operate, and
 - C. To inspect any equipment, operation, or method required in this Permit to Operate, and
 - D. To sample emissions from the source or require samples to be taken.
5. Legible copies of all SMAQMD Rule 201 permits shall be maintained on the premises with the equipment.

LOCAL (NON-FEDERALLY ENFORCEABLE) GENERAL REQUIREMENTS

EQUIPMENT OPERATION:

6. The equipment shall be properly maintained.
7. This permit does not authorize the emission of air contaminants in excess of those allowed by Division 26, Part 4, Chapter 3, of the Health and Safety Codes of the State of California or the Rules and Regulations of the SMAQMD.

EQUIPMENT BREAKDOWNS:

8. The permittee shall notify the SMAQMD Air Pollution Control Officer of any occurrence which constitutes a breakdown as defined in SMAQMD Rule 602 Section 201 as soon as reasonably possible, but no later than one hour after its detection. If the breakdown occurs when the SMAQMD Air Pollution Control Officer cannot be contacted, the report of breakdown shall be made at the commencement of the next regular working day. The notification shall identify the time, specific location, equipment involved, and to the extent known the cause(s) of the occurrence.
9. Upon notification of the breakdown condition, the SMAQMD Air Pollution Control Officer shall investigate the breakdown condition in accordance with uniform written procedures and guidelines relating to logging of initial reports on appropriate forms, investigation, and enforcement follow-up. If the occurrence does not constitute a breakdown condition, the SMAQMD Air Pollution Control Officer may take appropriate enforcement action.
10. An occurrence which constitutes a breakdown condition, and which persists only until the end of the production run or 24 hours, whichever is sooner (except for continuous air pollution monitoring equipment, for which the period shall be 96 hours) shall constitute a violation of any applicable emission limitation or restriction prescribed by SMAQMD Rules and Regulations; however, the SMAQMD Air Pollution Control Officer may elect to take no enforcement action if the owner or operator demonstrates to his satisfaction that a breakdown condition exists and the following requirements are met:
 - A. The notification required in SMAQMD Rule 602 Section 301.1 is made; and
 - B. Immediate appropriate corrective measures are undertaken and compliance is achieved, or the process is shutdown for corrective measures before commencement of the next production run or within 24 hours, whichever is sooner (except for continuous air pollution monitoring equipment for which the period shall be 96 hours). If the owner or operator elects to shut down rather than come into immediate compliance, (s)he must nonetheless take whatever steps are possible to minimize the impact of the breakdown within the 24 hour period; and
 - C. The breakdown does not interfere with the attainment and maintenance of any national ambient air quality standard.

LOCAL (NON-FEDERALLY ENFORCEABLE) GENERAL REQUIREMENTS

11. An occurrence which constitutes a breakdown condition shall not persist longer than the end of the production run or 24 hours, whichever is sooner (except for continuous air pollution monitoring equipment, for which the period shall be 96 hours), unless an emergency variance has been obtained.
12. If the breakdown condition will either require more than 24 hours to correct or persists longer than the end of the production run (except for continuous air pollution monitoring equipment, for which the period shall be 96 hours) the owner or operator may, in lieu of shutdown, request the SMAQMD Air Pollution Control Officer to commence the emergency variance procedure set forth in SMAQMD Rule 602 Section 304.
13. No emergency variance shall be granted unless the chairperson of the SMAQMD Hearing Board or other designated member(s) of the SMAQMD Hearing Board finds that:
 - A. The occurrence constitutes a breakdown condition;
 - B. Continued operation is not likely to create an immediate threat or hazard to public health or safety; and
 - C. The requirements for a variance set forth in California Health & Safety Code Sections 42352 and 42353 have been met;
 - D. The continued operation in a breakdown condition will not interfere with the attainment or maintenance of the national ambient air quality standards.
14. At any time after an emergency variance has been granted, the SMAQMD Air Pollution Control Officer may request for good cause that the chairperson or designated member(s) reconsider and revoke, modify or further condition the variance. The procedures set forth in SMAQMD Rule 602 Section 304.1 shall govern any further proceedings conducted under this condition.
15. An emergency variance shall remain in effect only for as long as necessary to repair or remedy the breakdown condition, but in no event after a properly noticed hearing to consider an interim or 90 day variance has been held, or 15 days from the date of the subject occurrence, whichever is sooner.
16. Within one week after a breakdown condition has been corrected, the owner or operator shall submit a written report to the SMAQMD Air Pollution Control Officer on forms supplied by the SMAQMD Air Pollution Control Officer describing the causes of the breakdown, corrective measures taken, estimated emissions during the breakdown and a statement that the condition has been corrected, together with the date of correction and proof of compliance. The SMAQMD Air Pollution Control Officer may, at the request of the owner or operator for good cause, extend up to 30 days the deadline for submittal of the report described in this condition.

LOCAL (NON-FEDERALLY ENFORCEABLE) GENERAL REQUIREMENTS

17. The burden of proof shall be on the owner or operator of the source to provide sufficient information to demonstrate that a breakdown did occur. If the owner or operator fails to provide sufficient information, the SMAQMD Air Pollution Control Officer shall undertake appropriate enforcement action.
18. Any failure to comply, or comply in a timely manner, with the reporting requirements established in SMAQMD Rule 602 Sections 301.1 and 401 shall constitute a separate violation of SMAQMD Rule 602.
19. It shall constitute a separate violation of SMAQMD Rule 602 for any person to file with the SMAQMD Air Pollution Control Officer a report which falsely, or without probable cause, claims that an occurrence is a breakdown condition.

ARCHITECTURAL COATINGS

20. Unless applied by an aerosol can or contained within a volume of one liter or less any person who supplies, sells, offers for sale or manufactures any architectural coating for use within the District, as well as any person who applies or solicits the application of any architectural coating within the District shall meet the requirements of SMAQMD Rule 442.
[Basis: SMAQMD Rule 442 (05-24-2001 version)]

EQUIPMENT SPECIFIC REQUIREMENTS:

- 1. DRAWN AND IRONED CAN MANUFACTURING LINE**
- 2. WASHCOAT OVEN**
- 3. INSIDE BAKE OVEN**
- 4. THERMAL OXIDIZER**

A. EQUIPMENT DESCRIPTION: The information specified under this section is enforceable by the SMAQMD, U.S. EPA and the public.

The requirements specified under the following sections apply to the following equipment:

Drawn and Ironed Can Manufacturing Line

P/O No.: 22883

Consisting of:

1. Various bodymaking equipment
2. Washcoat application equipment
3. inside spray coating equipment (vented to thermal oxidizer)

Washcoat Oven (vented to thermal oxidizer)

P/O No.: 13712

Manufacturer: Cincinnati machinery

Model: WCS-C46S

Heat Input: 6.4MMBTU/hour

Fuel: Natural gas

Inside Bake Oven (vented to thermal oxidizer)

P/O No. 13713

Manufacturer: Somerset Ross

Model: Not known

Heat Input: 14 MMBTU/hour

Fuel: Natural gas

Thermal Oxidizer

P/O No. 22884

Manufacturer: Somerset Ross

Model: RI-3-15000-95

Heat Input: (1) 4 MMBTU/hour and (2) 0.4 MMBTU/hour

Fuel: Natural gas

EQUIPMENT SPECIFIC REQUIREMENTS:

- 1. DRAWN AND IRONED CAN MANUFACTURING LINE**
- 2. WASHCOAT OVEN**
- 3. INSIDE BAKE OVEN**
- 4. THERMAL OXIDIZER**

B. EQUIPMENT SPECIFIC FEDERALLY ENFORCEABLE REQUIREMENTS: The requirements specified under this subsection are enforceable by the SMAQMD, U.S. EPA and the public.

EMISSION LIMITS:

1. Emissions from the Drawn and Ironed can manufacturing process shall not exceed the following limits:

[Basis: SMAQMD Rules 201 and 202]

| Equipment | Pollutant | Maximum Allowable Emissions | | | | |
|--|-----------|-----------------------------|----------------------|-------------|-------------|-------------|
| | | Daily lb/day | Quarterly lb/quarter | | | |
| | | | 1st Quarter | 2nd Quarter | 3rd Quarter | 4th Quarter |
| D and I Manufacturing Line: (A) Fugitives Non-fugitives (B) | ROC | 158.0 | 10,320 | 8,303 | 8,832 | 10,438 |
| | ROC | 71.2 | 4,644 | 3,736 | 3,974 | 4,698 |
| Washcoat Oven (C) (Natural gas combustion only) | PM10 | 0.8 | 70 | 56 | 60 | 70 |
| | SOx | 0.04 | 4 | 3 | 3 | 4 |
| | NOx | 7.0 | 609 | 490 | 525 | 616 |
| | CO | 1.5 | 131 | 105 | 113 | 132 |
| | ROC | 0.5 | 44 | 36 | 38 | 45 |
| Inside Bake Oven (C) (Natural gas combustion only) | PM10 | 2.5 | 218 | 175 | 188 | 220 |
| | SOx | 0.1 | 9 | 7 | 8 | 9 |
| | NOx | 26.0 | 2,262 | 1,820 | 1,950 | 2,288 |
| | CO | 6.5 | 566 | 455 | 488 | 572 |
| | ROC | 0.5 | 44 | 35 | 38 | 44 |
| Thermal Oxidizer (D) (Natural gas combustion and coating process) | PM10 (E) | 4.7 | 414 | 358 | 377 | 419 |
| | SOx (E) | 0.2 | 19 | 16 | 17 | 19 |
| | NOx (F) | 102.0 | 8,491 | 6,832 | 7,120 | 8,589 |
| | CO (F) | 50.0 | 4,116 | 3,311 | 3,547 | 4,162 |
| | ROC (F) | 72.5 | 4,736 | 3,810 | 4,054 | 4,791 |

EQUIPMENT SPECIFIC REQUIREMENTS:

- 1. DRAWN AND IRONED CAN MANUFACTURING LINE**
- 2. WASHCOAT OVEN**
- 3. INSIDE BAKE OVEN**
- 4. THERMAL OXIDIZER**

A. Emissions based on calculation method outlined below:

The ROC emissions from **each** coating process shall be based on the following:

$$\text{Fugitive ROC} = \text{Gallons of Coating Sprayed} \times \text{Coating VOC content} \times \% \text{ Fugitives}$$

$$\text{Non-Fugitive ROC} = \text{Gallons of Coating Sprayed} \times \text{Coating VOC content} \times \% \text{ Non-Fugitives} \times 0.05$$

Where,

- Gallons of Coating Sprayed = gallons/day or gallons/quarter
- Coating VOC Content = lb VOC/gallon coating
- % Fugitives = 10%
- % Non-Fugitives = 90%
- 0.05 = control efficiency factor based on 95% control

- B. Non-fugitive emissions are included in the emissions from the thermal oxidizer.
- C. Emissions based on maximum allowable natural gas throughput (see Condition No. 4) and the emission factors listed below. All combustion emissions are assumed to be vented through the thermal oxidizer.

| Equipment | Emission Factors for Natural Gas Combustion lb/MMcf | | | | |
|----------------------|--|---------|---------|----------|---------|
| | ROC | NOx | SOx | PM10 | CO |
| Washcoat oven (a) | 7.3 | 100 | 0.6 | 12 | 21 |
| Inside bake oven (a) | 2.8 | 140 | 0.6 | 13.7 | 35 |
| Thermal oxidizer | 2.8 (b) | 598 (c) | 0.6 (b) | 11.9 (b) | 364 (c) |

- (A) Emission factors from U.S. EPA AP-42, table 1.4.1-3 (10/93)
 (B) Emission factors from U.S. EPA AP-42, table 1.4.1-3 (10/96)
 (C) Emission factors correspond to a 25 ppmv NOx and a 25 ppmv CO concentration at the maximum thermal oxidizer exhaust flow rate of 16,000 dscfm.

EQUIPMENT SPECIFIC REQUIREMENTS:

- 1. DRAWN AND IRONED CAN MANUFACTURING LINE**
- 2. WASHCOAT OVEN**
- 3. INSIDE BAKE OVEN**
- 4. THERMAL OXIDIZER**

- D. Emissions from the thermal oxidizer include emissions from the washcoat oven, inside bake oven, and non-fugitive ROC emissions from the Drawn and Ironed can manufacturing line with a 95% destruction efficiency.
Daily emission limits are based on maximum allowable natural gas throughput for the washcoat oven and inside bake oven (see Condition No. 4) and operating the thermal oxidizer at maximum capacity (4.8 MMBTU/hr), 24 hours/day and the emission factors listed above.
- E. Quarterly PM10 and SOx emission limits are based on maximum allowable natural gas throughput for the washcoat oven and inside bake oven (see Condition No. 4) and operating the thermal oxidizer at maximum capacity (4.8 MMBTU/hr), 24 hours/day, total number of days/quarter and the emission factors listed above.
- F. Quarterly NOx, CO and ROC emission limits are based on maximum allowable natural gas throughput for the washcoat oven, inside bake oven (see Condition No. 4), and operating the thermal oxidizer at maximum capacity (4.8 MMBTU/hr) 24 hours/day, and the emission factors listed above, plus the non-fugitive ROC emissions from the Drawn and Ironed can manufacturing line with a 95% destruction efficiency.
2. The VOC content of coatings used in the wash coat process shall not exceed 250 grams/liter of coating (excluding water and exempt solvents) and 2.8 lb/gal of solids.
[Basis: SMAQMD Rule 202 and 452]
3. The VOC content of coatings used in the inside spray process shall not exceed 420 grams/liter of coating (excluding water and exempt solvents) and 6.9 lb/gal of solids.
[Basis: SMAQMD Rule 202 and 452]

EQUIPMENT SPECIFIC REQUIREMENTS:

- 1. DRAWN AND IRONED CAN MANUFACTURING LINE**
- 2. WASHCOAT OVEN**
- 3. INSIDE BAKE OVEN**
- 4. THERMAL OXIDIZER**

EQUIPMENT DESIGN, OPERATION AND MONITORING REQUIREMENTS:

4. The Drawn and Ironed can manufacturing facility shall not exceed the following natural gas usage limits:
[Basis: SMAQMD Rules 201 and 202]

| Equipment | Maximum Allowable Natural Gas Usage | | | | |
|------------------|--|-------------|-------------|-------------|------------|
| | Daily: cubic feet of natural gas/day | | | | |
| | Quarterly: cubic feet of natural gas/quarter | | | | |
| Daily | Quarterly | | | | |
| | 1st Quarter | 2nd Quarter | 3rd Quarter | 4th Quarter | |
| Washcoat oven | 70,000 | 6,090,000 | 4,900,000 | 5,250,000 | 6,160,000 |
| Inside bake oven | 186,000 | 16,182,000 | 13,020,000 | 13,950,000 | 16,368,000 |

5. Only washcoat process coatings receiving written approval from the SMAQMD Air Pollution Control Officer shall be applied to the external surface of cans (see Attachment A).
[Basis: SMAQMD Rules 201 and 202]
6. Only inside spray process coatings receiving written approval from the SMAQMD Air Pollution Control Officer shall be applied to the internal surface of cans (see Attachment A).
[Basis: SMAQMD Rules 201 and 202]
7. The use of additional washcoat and inside spray coatings may be approved by the SMAQMD Air Pollution Control Officer. A request for the use of additional coatings shall be submitted to the SMAQMD Air Pollution Control Officer in writing with the appropriate coating VOC information at least 30 days prior to anticipated use.
[Basis: SMAQMD Rules 201 and 202]
8. The washcoat oven, inside bake oven and thermal oxidizer shall only use natural gas fuel.
[Basis: SMAQMD Rules 201 and 202]
9. The washcoat oven (P/O 13712), inside bake oven (P/O 13713) and thermal oxidizer (P/O 22884) shall **each** be equipped with a non-resetting natural gas fuel meter to ensure compliance with Condition No. 1 and Condition No. 4.
[Basis: SMAQMD Rules 201 and 202]

EQUIPMENT SPECIFIC REQUIREMENTS:

- 1. DRAWN AND IRONED CAN MANUFACTURING LINE**
- 2. WASHCOAT OVEN**
- 3. INSIDE BAKE OVEN**
- 4. THERMAL OXIDIZER**

10. The ROC capture efficiency at the washcoat oven (P/O 13712), inside spray process (P/O 22883) and inside bake oven (P/O 13713) shall be at least 90% (verified in the initial source test conducted on June 8-9, 1995 and August 24, 1995).
[Basis: SMAQMD Rules 201 and 202]
11. The washcoat oven (P/O 13712), inside spray process (P/O 22883) and inside bake oven (P/O 13713) shall be vented through the thermal oxidizer (P/O 22884) except during periods of safety purging/shutdown.
[Basis: SMAQMD Rules 201 and 202]
12. ROC emissions from the washcoat oven (P/O 13712), inside spray process (P/O 22883) and inside bake oven (P/O 13713) that are vented through the thermal oxidizer (P/O 22884) shall be destroyed by at least 95.0% by weight.
[Basis: SMAQMD Rules 201 and 202]
13. The Drawn and Ironed can manufacturing line (including the washcoat and inside bake ovens) shall not operate unless the thermal oxidizer is fully operational and at a minimum operating temperature of 1,485°F.
[Basis: SMAQMD Rules 201 and 202, and 40 CFR 64]
14. The thermal oxidizer shall be equipped with a temperature gauge to verify compliance with Condition No. 13.
[Basis: SMAQMD Rules 201 and 202, and 40 CFR 64]
15. The thermal oxidizer temperature gauge shall be easily accessible, in good operating condition and calibrated at all times.
[Basis: SMAQMD Rules 201 and 202, and 40 CFR 64]
16. An excursion is deemed to occur when the thermal oxidizer temperature drops below 1485°F and the Drawn and Ironed can manufacturing line continues to operate. 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.
[Basis: SMAQMD Rules 201 and 202, and 40 CFR 64]
17. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR 64.7.
[Basis: 40 CFR 64]
18. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR 64.8.
[Basis: 40 CFR 64]

EQUIPMENT SPECIFIC REQUIREMENTS:

- 1. DRAWN AND IRONED CAN MANUFACTURING LINE**
- 2. WASHCOAT OVEN**
- 3. INSIDE BAKE OVEN**
- 4. THERMAL OXIDIZER**

19. The permittee shall comply with the record keeping and reporting requirements of 40 CFR 64.9.
[Basis: 40 CFR 64]

20. No VOC containing material shall be used for cleaning of the Drawn and Ironed can manufacturing line or any of its parts unless cleaned in a degreaser approved by the SMAQMD Air Pollution Control Officer.
[Basis: SMAQMD Rule 202]

RECORDKEEPING AND REPORTING REQUIREMENTS:

21. The following record shall be continuously maintained on site for the most recent five year period and shall be made available to the SMAQMD Air Pollution Control Officer upon request. Quarterly records shall be made available for inspection within 30 days of the end of the previous quarter.
[Basis: SMAQMD Rules 201 and 202]

| Frequency | Information to be recorded |
|------------|--|
| Continuous | A. Thermal oxidizer operating temperature (degrees Fahrenheit) B. Records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan, any activities undertaken to implement a quality improvement plan, and other supporting information. [Basis: 40 CFR 64.9] |
| Daily | C. Types, quantities (gallons/day), and VOC content (grams/liter) of coatings used in the wash coat process and inside spray process. D. ROC emissions associated with the Drawn and Ironed can manufacturing line (fugitive and non-fugitive). (lb/day) E. Natural gas consumption of the washcoat oven and inside bake oven (cubic feet/day for each unit) F. No daily natural gas consumption records are required for the thermal oxidizer since emissions are based on operating at maximum capacity, 24 hours/day and the factors in Condition No. 1. |
| Quarterly | G. Types, quantities (gallons/quarter), and VOC content (grams/liter) of coatings used in the wash coat process and the inside spray process. H. ROC emissions associated with the Drawn and Ironed can manufacturing line (fugitive and non-fugitive). (lb/quarter) I. Natural gas consumption of the washcoat oven, inside bake oven, and thermal oxidizer. (cubic feet/quarter for each unit) |

EQUIPMENT SPECIFIC REQUIREMENTS:

- 1. DRAWN AND IRONED CAN MANUFACTURING LINE**
- 2. WASHCOAT OVEN**
- 3. INSIDE BAKE OVEN**
- 4. THERMAL OXIDIZER**

22. The following written reports shall be submitted to the SMAQMD Air Pollution Control Officer.
[Basis: SMAQMD Rules 201 and 202]

| Frequency | Reports to be submitted |
|---|---|
| Quarterly by: January 31 April 30 July 31 October 31 | A. Types and amounts of coatings used. (gallons/quarter) B. Natural gas usage for the washcoat oven, inside bake oven and thermal oxidizer: 1. cubic feet/day for each unit 2. cubic feet/quarter for each unit C. ROC emissions associated with the Drawn and Ironed can manufacturing line (fugitive and non-fugitive): 1. lb/day 2. lb/quarter D. Total ROC emissions from non-fugitive controlled emissions from the Drawn and Ironed can manufacturing line combined with the ROC emissions from natural gas combustion in the washcoat oven, inside spray oven and thermal oxidizer based on the emission factors outlined in Condition No. 1. 1. lb/day 2. lb/quarter E. Total combined NOx and CO emissions from natural gas combustion in the washcoat oven, inside spray oven and thermal oxidizer based on the emission factors outlined in Condition No. 1: 1. lb/day 2. lb/quarter |
| Annually by January 31 | F. Summary of annual HAP emissions to include: 1. Weight percent of each individual HAP in each coating used. 2. Emissions of each individual HAP. (tons/year) 3. Emissions of all HAPs combined. (tons/year) G. Operation and Maintenance Plan as described in Section 401 of Rule 452 Can Coating |

- EQUIPMENT SPECIFIC REQUIREMENTS:**
- 1. DRAWN AND IRONED CAN MANUFACTURING LINE**
 - 2. WASHCOAT OVEN**
 - 3. INSIDE BAKE OVEN**
 - 4. THERMAL OXIDIZER**
-

EMISSION TESTING REQUIREMENTS

23. An emission test for ROC destruction efficiency of the thermal oxidizer (P/O 22883) shall be conducted each calendar year.

[Basis: SMAQMD Rules 201 and 202]

- A. Submit a source test plan to the SMAQMD Air Pollution Control Officer for approval at least 30 days before the source test is to be performed.
- B. Notify the SMAQMD Air Pollution Control Officer at least 7 days prior to the source test date.
- C. Submit the source test report to the SMAQMD Air Pollution Control Officer within 60 days from the completion of the source test.

24. Capture efficiency, when the SMAQMD Air Pollution Control Officer requires such a test, shall be determined by Bay Area Air Quality Management District, Manual of Procedures, Source Test Procedures ST-7, November 1, 1989 or EPA "Guidelines for Developing Capture Efficiency Protocols".

[Basis: SMAQMD Rules 201 and 202]

- EQUIPMENT SPECIFIC REQUIREMENTS:**
1. **DRAWN AND IRONED CAN MANUFACTURING LINE**
 2. **WASHCOAT OVEN**
 3. **INSIDE BAKE OVEN**
 4. **THERMAL OXIDIZER**

ATTACHMENT A

List Of Approved Coatings For The Drawn and Ironed Can Manufacturing Line as of August 29, 2011

The coatings listed below have been approved for **continuous** use in the Drawn and Ironed can manufacturing line. This list does not include coatings approved for trial use. Trial coatings shall be approved on a case-by-case basis.

| Approved Exterior Washcoat Coatings | | |
|--|--|-------------------------|
| Product Name | Maximum Allowable VOC Content | |
| | lb VOC/gallon of coating (less water and exempt solvents) | lb VOC/gallon of solids |
| 1. Dexter 440 Series | 2.09 | 2.8 |
| 2. PPG 1026810 | 2.09 | 2.8 |
| 3. Valspar 27Q30AA | 2.09 | 2.8 |

| Approved Interior Spray Coatings | | |
|---|--|-------------------------|
| Product Name | Maximum Allowable VOC Content | |
| | lb VOC/gallon of coating (less water and exempt solvents) | lb VOC/gallon of solids |
| 1. Valspar 500 Series | 3.5 | 6.9 |
| 2. Valspar No. 10Q25AB | 3.5 | 6.9 |
| 3. Technical Coatings No. 12432A | 3.5 | 6.9 |
| 4. ICI Coatings No. 642W Series | 3.5 | 6.9 |
| 5. PPG 4553304 | 3.5 | 6.9 |

INSIGNIFICANT EMISSIONS UNITS

The following systems are considered insignificant emissions units and are not subject to equipment-specific requirements. However, these units are required to comply with all applicable general requirements:

| Equipment Description | Basis for Determination of Insignificant Emissions Unit is made based on SMAQMD "List and Criteria", Part B, Section 5 modified April 2001. |
|----------------------------------|---|
| 1. Uncoiler | <i>No Specific Source Category applies to these processes.</i> [Part B, Section 5, II] <i>Meets General Criteria for Insignificant Activities.</i> Emits < 0.5 tons per year of a federal hazardous air pollutant (HAP) and no more than 2 tons per year of a regulated pollutant that is not a HAP. [Part B, Section 5, I] |
| 2. Lubricator | |
| 3. Cupper | |
| 4. Bodymakers | |
| 5. Trimmers | |
| 6. Washer | |
| 7. Flanger | |
| 8. Beader | |
| 9. Light Tester | <i>Meets Metal Products Specific Source Category Criteria.</i> Equipment is used exclusively for the inspection of metal products. [Part B, Section 5, II, S] |
| 10. Slitter | <i>No Specific Source Category applies to these processes.</i> [Part B, Section 5, II] |
| 11. Flanger | |
| 12. Beader | <i>Meets General Criteria for Insignificant Activities.</i> Emits < 0.5 tons per year of a federal hazardous air pollutant (HAP) and no more than 2 tons per year of a regulated pollutant that is not a HAP. [Part B, Section 5, I] |
| 13. Seamer | |
| 14. Bodymaker No. 1 | |
| 15. Bodymaker No. 2 | |
| 16. Air Tester | <i>Meets Metal Products Specific Source Category Criteria.</i> Equipment is used exclusively for the inspection of metal products. [Part B, Section 5, II, S] |
| 17. Forklifts | <i>No Specific Source Category applies to these processes.</i> [Part B, Section 5, II] |
| 18. Vacuum Pumps | |
| 19. Hot Water Heaters (electric) | <i>Meets General Criteria for Insignificant Activities.</i> Emits < 0.5 tons per year of a federal hazardous air pollutant (HAP) and no more than 2 tons per year of a regulated pollutant that is not a HAP. [Part B, Section 5, I] |
| 20. Air Conditioning System | |
| 21. Building Ventilation | |
| 22. Ventilation Heat Tunnels | |
| 23. Laboratory Equipment | |

INSIGNIFICANT EMISSIONS UNITS

| Equipment Description | Basis for Determination of Insignificant Emissions Unit is made based on SMAQMD "List and Criteria", Part B, Section 5 modified April 2001. |
|-----------------------------------|--|
| 24. Air Flow Cleaners | <p><i>No Specific Source Category applies to these processes.</i> [Part B, Section 5, II]</p> |
| 25. Lubrication Stations | |
| 26. Battery Usage/Charging | <p><i>Meets General Criteria for Insignificant Activities.</i> Emits < 0.5 tons per year of a federal hazardous air pollutant (HAP) and no more than 2 tons per year of a regulated pollutant that is not a HAP. [Part B, Section 5, I]</p> |
| 27. Maintenance Welding Hoods | <p><i>Meets Brazing, Soldering, Welding, and Cutting Torches Specific Source Category Criteria.</i> Welding equipment is used for maintenance, as part of the manufacturing process, which is included on the U.S. EPA List of Trivial Activities and the total HAP potential to emit is less than 0.5 tons per year. [Part B, Section 5, II, Q]</p> |
| 28. D and I Washcoat Tank | <p><i>Meets Storage Containers, Reservoirs, and Tanks – General Organic and VOC-containing Material Specific Source Category Criteria.</i> Vapor pressure < 0.1 psi as determined by ASTM test method D-2879-86. [Part B, Section 5, II, H, 1, b]</p> |
| 29. D and I Enamel Tank | <p><i>No Specific Source Category applies to this process.</i> [Part B, Section 5, II]</p> <p><i>Meets General Criteria for Insignificant Activities.</i> Emits < 0.5 tons per year of a federal hazardous air pollutant (HAP) and no more than 2 tons per year of a regulated pollutant that is not a HAP. [Part B, Section 5, I]</p> |
| 30. D and I Inside Enamel Tank | <p><i>Meets Storage Containers, Reservoirs, and Tanks – General Organic and VOC-containing Material Specific Source Category Criteria.</i> Capacity < 6,077 gallons and vapor pressure < 1.5 psi as determined by ASTM test method D-2879-86. [Part B, Section 5, II, H, 3]</p> |
| 31. Cooling Tower, HVAC | <p><i>Meets Cooling Tower Specific Source Category Criteria.</i> Has a circulation rate of less than 10,000 gallons per minute, and is not used to cool process water, water from barometric jets, or water from barometric condensers. [Part B, Section 5, II, C]</p> |
| 32. Cooling Tower, Air Compressor | |

INSIGNIFICANT EMISSIONS UNITS

| Equipment Description | Basis for Determination of Insignificant Emissions Unit is made based on SMAQMD “List and Criteria”, Part B, Section 5 modified April 2001. |
|--------------------------------------|--|
| 33. Degreasers, Exempt Solvent | <i>No Specific Source Category applies to this process.</i> [Part B, Section 5, II] |
| 34. Can Coding (6) Videojet Printers | |
| 35. Can Coding (8) Dotjet Printers | <i>Meets General Criteria for Insignificant Activities.</i> Emits < 0.5 tons per year of a federal hazardous air pollutant (HAP) and no more than 2 tons per year of a regulated pollutant that is not a HAP. [Part B, Section 5, I] |
| 36. Side Seam Powder Coating | |

ACRONYMS, ABBREVIATIONS AND UNITS OF MEASURE

Acronyms, abbreviations and units of measure used in this permit are defined as follows:

ASTM

American Society for Testing and Materials

BACT

Best Available Control Technology.

CAA

The federal Clean Air Act.

CARB

California Air Resources Board.

CFC

Chloro-fluoro-carbons. A class of compounds responsible for destroying ozone in the upper atmosphere.

CFR

The Code of Federal Regulations. 40 CFR contains the implementing regulations for federal environmental statutes such as the Clean Air Act. Parts 50-99 of 40 CFR contain the requirements for air pollution programs.

CO

Carbon monoxide.

CO₂

Carbon dioxide.

ERC

Emission reduction credit.

Federally Enforceable

All limitations and conditions which are enforceable by the Administrator of the U.S. EPA including those requirements developed pursuant to 40 CFR Part 51, Subpart I (NSR), Part 52.21 (PSD), Part 60 (NSPS), Part 61 (NESHAPs), Part 63 (HAP) and Part 72 (Permits Regulation, Acid Rain) including limitations and conditions contained in operating permits issued under a U.S. EPA approved program that has been incorporated into the California SIP.

NESHAP

National Emission Standards for Hazardous Air Pollutants (see 40 CFR Parts 61 and 63).

NO_x

Nitrogen oxides.

ACRONYMS, ABBREVIATIONS AND UNITS OF MEASURE

NSPS

New Source Performance Standards. U.S. EPA standards for emissions from new stationary sources. Mandated by Title I, Section 111 of the federal Clean Air Act and implemented by 40 CFR Part 60 and SMAQMD Regulation 8.

NSR

New Source Review. A federal program for pre-construction review and permitting of new and modified sources of pollutants for which criteria have been established in accordance with Section 108 of the Federal Clean Air Act. Mandated by Title I of the federal Clean Air Act and implemented by 40 CFR Parts 51 and 52 and SMAQMD Rule 202. (Note: There are additional NSR requirements mandated by the California Clean Air Act.)

O₂

Oxygen.

Offset Requirement

A New Source Review requirement to provide federally enforceable emission offsets for the emissions from a new or modified source. Applies to emissions of ROC, NO_x, SO₂ and PM₁₀.

PM

Particulate matter.

PM₁₀

Particulate matter with aerodynamic equivalent diameter of less than or equal to 10 microns.

PSD

Prevention of Significant Deterioration. A federal program for permitting new and modified sources of those air pollutants for which the SMAQMD is classified "attainment" of the National Air Ambient Quality Standards. Mandated by Title I of the federal Clean Air Act and implemented by 40 CFR Part 52.

ROC

Reactive organic compounds.

SIP

State Implementation Plan. CARB and SMAQMD programs and regulations approved by U.S. EPA and developed in order to attain the National Air Ambient Quality Standards. Mandated by Title I of the federal Clean Air Act.

SMAQMD

Sacramento Metropolitan Air Quality Management District.

SO₂

Sulfur dioxide.

ACRONYMS, ABBREVIATIONS AND UNITS OF MEASURE

Title V

Title V of the federal Clean Air Act. Title V requires the SMAQMD to operate a federally enforceable operating permit program for major stationary sources and other specified sources.

TSP

Total suspended particulate.

U.S. EPA

The federal Environmental Protection Agency.

VOC

Volatile Organic Compounds.

UNITS OF MEASURE:

| | | |
|----------------|---|----------------------------------|
| BTU | = | British Thermal Unit |
| cfm | = | cubic feet per minute |
| cm | = | centimeter |
| g | = | grams |
| gal | = | gallon |
| gpm | = | gallons per minute |
| hp | = | horsepower |
| hr | = | hour |
| lb | = | pound |
| in | = | inch |
| kg | = | kilogram |
| max | = | maximum |
| m ² | = | square meter |
| min | = | minute |
| mm | = | millimeter |
| MM | = | million |
| ppmv | = | parts per million by volume |
| ppmw | = | parts per million by weight |
| psia | = | pounds per square inch, absolute |
| psig | = | pounds per square inch, gauge |
| quarter | = | calendar quarter |
| RVP | = | Reid vapor pressure |
| scfm | = | standard cubic feet per minute |
| yr | = | year |