

ATTACHMENT C

SMAQMD Rule 201 Permits To Operate



AIR QUALITY
MANAGEMENT DISTRICT

PERMIT TO OPERATE

ISSUED TO: SILGAN CAN COMPANY

EQUIPMENT LOCATION: 6200 FRANKLIN BLVD., SACRAMENTO, CA 95824

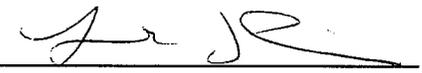
PERMIT NO.	EQUIPMENT DESCRIPTION
22883	DRAWN AND IRONED CAN MANUFACTURING LINE CONSISTING OF: 1. VARIOUS BODY MAKING EQUIPMENT 2. WASHCOAT APPLICATION EQUIPMENT 3. INSIDE SPRAY COATING EQUIPMENT VENTED TO THERMAL OXIDIZER (P/O 22884)
13712	WASHCOAT OVEN, CINCINNATI MACHINERY, WCS-C46S, 6.4 MMBTU/HR, VENTED TO THERMAL OXIDIZER (P/O 22884)
13713	INSIDE BAKE OVEN, ROSS/SOMERSET, 14 MMBTU/HR, VENTED TO THERMAL OXIDIZER (P/O 22884)
22884	THERMAL OXIDIZER, MAKE: SOMMERSET ROSS, MODEL: RI-3-15000-95, EQUIPPED WITH ONE 4.0 MMBTU/HR BURNER AND TWO 0.4 MMBTU/HR BURNERS; ALSO EQUIPPED WITH A PULSE JET CARTRIDGE DUST COLLECTOR, MAKE: MICRO AIR, MODEL: RP-42, 7.5 HP FAN

DATE ISSUED: 06-30-2011

LARRY GREENE

AIR POLLUTION CONTROL OFFICER

DATE EXPIRES: 02-24-2012 (UNLESS RENEWED)

BY: 

**SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT**

SUBJECT TO THE FOLLOWING CONDITIONS:

GENERAL

1. THE EQUIPMENT SHALL BE PROPERLY MAINTAINED AND OPERATED IN ACCORDANCE WITH THE MANUFACTURER'S RECOMMENDATIONS AT ALL TIMES.
2. THE 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.
3. THIS PERMIT DOES NOT AUTHORIZE THE EMISSION OF AIR CONTAMINANTS IN EXCESS OF THOSE ALLOWED BY DIVISION 26, PART 4, CHAPTER 3, OF THE CALIFORNIA HEALTH AND SAFETY CODE OR THE RULES AND REGULATIONS OF THE AIR QUALITY MANAGEMENT DISTRICT.
4. THE EQUIPMENT SHALL NOT DISCHARGE SUCH QUANTITIES OF AIR CONTAMINANTS OR OTHER MATERIALS WHICH CAUSE INJURY, DETRIMENT, NUISANCE OR ANNOYANCE TO ANY CONSIDERABLE NUMBER OF PERSONS OR TO THE PUBLIC, OR WHICH ENDANGER THE COMFORT, REPOSE, HEALTH, OR SAFETY OF ANY SUCH PERSONS OR THE PUBLIC, OR WHICH CAUSE, OR HAVE A NATURAL TENDENCY TO CAUSE, INJURY OR DAMAGE TO BUSINESS OR PROPERTY.
5. A LEGIBLE COPY OF THIS PERMIT SHALL BE MAINTAINED ON THE PREMISES WITH THE EQUIPMENT.

EMISSIONS LIMITATIONS

6. THE EQUIPMENT SHALL NOT DISCHARGE INTO THE ATMOSPHERE ANY VISIBLE AIR CONTAMINANTS OTHER THAN UNCOMBINED WATER VAPOR, FOR A PERIOD OR PERIODS AGGREGATING MORE THAN THREE MINUTES IN ANY ONE HOUR, WHICH IS AS DARK OR DARKER THAN RINGELMANN 1 OR EQUIVALENT TO OR GREATER THAN 20% OPACITY.

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7. EMISSIONS FROM THE D AND I CAN MANUFACTURING PROCESS SHALL NOT EXCEED THE FOLLOWING LIMITS:

EQUIPMENT	POLLUTANT	MAXIMUM ALLOWABLE EMISSIONS (LB)				
		DAILY	1ST QTR	2ND QTR	3RD QTR	4TH QTR
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

(A) EMISSIONS BASED ON THE CALCULATION METHOD OUTLINED BELOW.

(B) NON-FUGITIVE EMISSIONS ARE INCLUDED IN THE EMISSIONS FROM THE THERMAL OXIDIZER.

(C) EMISSIONS BASED ON MAXIMUM ALLOWABLE NATURAL GAS THROUGHPUT (SEE CONDITION #9) AND THE EMISSION FACTORS LISTED BELOW. ALL COMBUSTION EMISSIONS ARE ASSUMED TO BE VENTED THROUGH THE THERMAL OXIDIZER.

(D) EMISSIONS FROM THE THERMAL OXIDIZER INCLUDE EMISSIONS FROM THE WASHCOAT OVEN, INSIDE BAKE OVEN, AND NON-FUGITIVE ROC EMISSIONS FROM THE D AND I CAN MANUFACTURING LINE WITH A 95% CONTROL EFFICIENCY.

DAILY EMISSION LIMITS ARE BASED ON MAXIMUM ALLOWABLE NATURAL GAS THROUGHPUT FOR THE WASHCOAT OVEN AND INSIDE BAKE OVEN (SEE CONDITION NO. 10) AND OPERATING THE THERMAL OXIDIZER AT MAXIMUM CAPACITY (4.8 MM BTU/HR), 24 HOURS/DAY, AND THE EMISSION FACTORS LISTED BELOW.

(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. 10) AND OPERATING THE THERMAL OXIDIZER AT MAXIMUM CAPACITY (4.8 MM BTU/HR), 24 HOURS/DAY, TOTAL NUMBER OF DAY/QUARTER, AND THE EMISSION FACTORS LISTED BELOW.

(F) QUARTERLY NOx, CO, AND ROC EMISSION LIMITS ARE BASED ON NATURAL GAS THROUGHPUT FOR THE WASHCOAT OVEN, INSIDE BAKE OVEN, AND THERMAL OXIDIZER, THE EMISSION FACTORS LISTED BELOW, AND THE NON-FUGITIVE ROC EMISSIONS FROM THE D AND I CAN MANUFACTURING LINE WITH A 95% CONTROL EFFICIENCY.

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THE ROC EMISSION FROM EACH COATING PROCESS SHALL BE BASED ON THE FOLLOWING:

$$\text{FUGITIVE ROC} = \text{GALLONS OF COATING SPRAYED} \times \text{COATING VOC CONTENT} \times \% \text{ FUGITIVES}$$

$$\text{CONTROLLED ROC} = \text{GALLONS OF COATING SPRAYED} \times \text{COATING VOC CONTENT} \times \% \text{ NON-FUGITIVES} \times 0.05$$

WHERE,

- GALLONS OF COATING SPRAYED = GALLONS/DAY OR GALLONS/QUARTER
- COATING VOC CONTENT = LBS VOC/GALLON COATING
- % FUGITIVES = 10%
- % NON-FUGITIVES = 90%
- 0.05 = CONTROL EFFICIENCY FACTOR BASED ON 95% CONTROL

EMISSIONS FROM NATURAL GAS COMBUSTION SHALL BE BASED ON THE FOLLOWING:

EQUIPMENT DESCRIPTION	EMISSION FACTORS FOR NATURAL GAS COMBUSTION (LB/MM CF)				
	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 AP-42, TABLE 1.4.1-3 (10/93)

(B) EMISSION FACTORS FROM AP-42, TABLE 1.4.1-3 (10/96)

(C) EMISSION FACTORS CORRESPOND TO A 25 PPMV NO_x AND 25 PPMV CO CONCENTRATIONS AT THE MAXIMUM OXIDIZER EXHAUST FLOW RATE OF 16,000 DSCFM.

EQUIPMENT OPERATION

8. THE VOC CONTENT OF COATINGS USED IN THE WASH COAT PROCESS SHALL NOT EXCEED 250 GRAMS/LITER OF COATING (EXCLUDING WATER AND EXEMPT SOLVENTS) OR 2.8 LB/GAL OF SOLIDS.
9. THE VOC CONTENT OF COATINGS USED IN THE INSIDE SPRAY PROCESS SHALL NOT EXCEED 420 GRAMS/LITER OF COATING (EXCLUDING WATER AND EXEMPT SOLVENTS) OR 6.9 LB/GAL OF SOLIDS.
10. THE D AND I CAN MANUFACTURING PROCESS SHALL NOT EXCEED THE FOLLOWING THROUGHPUT LIMITS:

EQUIPMENT	MAXIMUM ALLOWABLE THROUGHPUT (1,000 CF OF NAT. GAS)				
	DAILY	1ST QTR	2ND QTR	3RD QTR	4TH QTR
WASHCOAT OVEN	70	6,090	4,900	5,250	6,160
INSIDE BAKE OVEN	186	16,182	13,020	13,950	16,368

11. ONLY COATINGS PREVIOUSLY APPROVED BY THE APCO FOR THE WASH COAT PROCESS SHALL BE APPLIED TO THE EXTERNAL SURFACE OF THE CAN (SEE ATTACHMENT A).

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12. ONLY COATINGS PREVIOUSLY APPROVED BY THE APCO FOR THE INSIDE SPRAY PROCESS SHALL BE APPLIED TO THE INTERNAL SURFACE OF THE CAN (SEE ATTACHMENT A).
13. THE USE OF ADDITIONAL WASHCOAT AND INSIDE SPRAY COATINGS MAY BE APPROVED BY THE APCO. A REQUEST FOR USE OF ADDITIONAL COATINGS SHALL BE SUBMITTED IN WRITING ALONG WITH THE APPROPRIATE COATING VOC INFORMATION AT LEAST 30 DAYS PRIOR TO ANTICIPATED USE.
14. THE WASHCOAT OVEN, INSIDE BAKE OVEN, AND THERMAL OXIDIZER SHALL BE FIRED ON NATURAL GAS ONLY.
15. THE OVENS (P/Os 13712 AND 13713) AND THERMAL OXIDIZER (P/O 22884) SHALL EACH BE EQUIPPED WITH NON-RESETTING NATURAL GAS METERS TO ENSURE COMPLIANCE WITH CONDITION NOS. 7 AND 10.
16. A. ROC CAPTURE EFFICIENCY AT THE WASHCOAT OVEN (P/O NO. 13712), INSIDE SPRAY PROCESS (P/O NO. 22883) AND INSIDE BAKE OVEN (P/O NO. 13713) SHALL BE AT LEAST 90% (VERIFIED IN THE INITIAL SOURCE TEST CONDUCTED ON 6/8-9/95 AND 8/24/95).

B. CAPTURE EFFICIENCY, WHEN THE APCO REQUIRES 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".
17. THE WASHCOAT OVEN (P/O NO. 13712), INSIDE SPRAY PROCESS (P/O NO. 22883) AND INSIDE BAKE OVEN (P/O NO. 13713) SHALL BE VENTED THROUGH THE THERMAL OXIDIZER (P/O NO. 22884), EXCEPT DURING PERIODS OF SAFETY PURGING/ SHUTDOWN.
18. ROC EMISSIONS FROM THE WASHCOAT OVEN (P/O 13712), INSIDE SPRAY PROCESS (P/O 22883) AND INSIDE BAKE OVEN (P/O 13713) VENTED THROUGH THE THERMAL OXIDIZER (P/O 22884) SHALL BE CONTROLLED BY AT LEAST 95.0% BY WEIGHT.
19. THE D AND I 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 1,485⁰F.
20. THE THERMAL OXIDIZER SHALL BE EQUIPPED WITH A TEMPERATURE GAUGE TO VERIFY COMPLIANCE WITH CONDITION NO. 19.
21. THE TEMPERATURE GAUGE SHALL BE EASILY ACCESSIBLE, IN GOOD OPERATING CONDITION AND CALIBRATED AT ALL TIMES.
22. NO VOC-CONTAINING MATERIAL SHALL BE USED FOR CLEANING OF THE D AND I LINE OR ANY OF ITS PARTS UNLESS CLEANED IN A DEGREASER APPROVED BY THE DISTRICT.
23. THE DUST COLLECTOR SHALL BE EQUIPPED WITH A PRESSURE DIFFERENTIAL GAUGE TO INDICATE THE PRESSURE DROP ACROSS THE FILTERS AND SHALL BE OPERATED WITHIN THE MANUFACTURER'S RECOMMENDED PRESSURE DIFFERENTIAL RANGE.
24. THE DUST COLLECTOR SHALL BE IN OPERATION AT ALL TIMES DURING THE OPERATION OF THE THERMAL OXIDIZER.
25. THE DUST COLLECTOR CLEANING FREQUENCY AND DURATION SHALL FOLLOW THE MANUFACTURER'S RECOMMENDATION.
26. THE MATERIALS COLLECTED FROM THE DUST COLLECTOR SHALL BE DISCHARGED INTO A COVERED CONTAINER AND ANY TRANSFER OF THIS MATERIAL SHALL BE PERFORMED IN A MANNER PREVENTING ANY FUGITIVE EMISSION.

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RECORDKEEPING

27. 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.

FREQUENCY	INFORMATION TO BE RECORDED
CONTINUOUS	THERMAL OXIDIZER OPERATING TEMPERATURE (DEGREES FAHRENHEIT)
DAILY	A. TYPES, QUANTITIES (GALLONS/DAY) AND VOC CONTENT (LBS/GALLON) OF COATINGS USED IN THE WASH COAT PROCESS AND INSIDE SPRAY PROCESS. B. NATURAL GAS CONSUMPTION OF THE WASHCOAT OVEN AND INSIDE BAKE OVEN (CUBIC FEET/DAY FOR EACH UNIT) C. 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. 7.
QUARTERLY	D. TYPES, QUANTITIES (GALLONS/QUARTER) AND VOC CONTENT (LBS/GALLON) OF COATINGS USED IN THE WASH COAT PROCESS AND THE INSIDE SPRAY PROCESS. E. NATURAL GAS CONSUMPTION OF THE WASHCOAT OVEN, INSIDE BAKE OVEN, AND THERMAL OXIDIZER (CUBIC FEET/QUARTER FOR EACH UNIT)

REPORTING

28. THE FOLLOWING REPORTS SHALL BE SUBMITTED TO THE SMAQMD AIR POLLUTION CONTROL OFFICER. QUARTERLY REPORTS SHALL BE SUBMITTED WITHIN 30 DAYS OF THE END OF THE PREVIOUS QUARTER.

FREQUENCY	REPORTS TO BE SUBMITTED
QUARTERLY	A. TYPES AND AMOUNTS OF COATINGS USED (GALLONS/QUARTER) B. NATURAL GAS USAGE FOR THE WASHCOAT OVEN, INSIDE BAKE OVEN AND THERMAL OXIDIZER (CUBIC FEET/QUARTER FOR EACH UNIT) C. ROC EMISSIONS ASSOCIATED WITH THE D AND I CAN MANUFACTURING LINE (FUGITIVE AND NON-FUGITIVE) (LBS/QUARTER) D. TOTAL ROC EMISSIONS FROM NON-FUGITIVE CONTROLLED EMISSIONS FROM THE D AND I 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. 7 (LBS/QUARTER). E. TOTAL COMBINED NO _x 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. 7 (LB/QUARTER).

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SOURCE TESTING

29. AN EMISSION TEST FOR ROC CONTROL EFFICIENCY OF THE THERMAL OXIDIZER (P/O NO. 22884) SHALL BE CONDUCTED EACH CALENDAR YEAR. THE TEST SHALL CONFORM TO THE FOLLOWING TIME SCHEDULE:
- A. A SOURCE TEST PLAN SHALL BE SUBMITTED FOR SMAQMD APPROVAL AT LEAST 30 DAYS PRIOR TO THE PROPOSED TEST DATE.
 - B. THE SMAQMD SHALL BE GIVEN AT LEAST SEVEN DAYS NOTICE OF THE ACTUAL TIME AND DATE OF EACH TEST SO THAT A SMAQMD REPRESENTATIVE MAY OBSERVE THE TEST.
 - C. THE RESULTS OF EACH TEST ALONG WITH THE ACTUAL OPERATING PARAMETERS DURING THE TEST SHALL BE SUBMITTED TO THE SMAQMD NO LATER THAN 60 DAYS FOLLOWING EACH TEST.

YOUR APPLICATION FOR THIS AIR QUALITY PERMIT TO OPERATE WAS EVALUATED FOR COMPLIANCE WITH SMAQMD, STATE AND FEDERAL AIR QUALITY RULES. THE FOLLOWING LISTED RULES ARE THOSE THAT ARE MOST APPLICABLE TO THE OPERATION OF YOUR EQUIPMENT. OTHER RULES MAY ALSO BE APPLICABLE.

<u>SMAQMD RULE NO.</u>	<u>RULE TITLE</u>
201	GENERAL PERMIT REQUIREMENTS
202	NEW SOURCE REVIEW
301	PERMIT FEES
401	RINGELMANN CHART
406	SPECIFIC CONTAMINANTS
420	SULFUR CONTENT OF FUELS
452	CAN COATING

IN ADDITION, THE CONDITIONS ON THIS PERMIT TO OPERATE MAY REFLECT SOME, BUT NOT ALL, REQUIREMENTS OF THESE RULES. THERE MAY BE OTHER CONDITIONS THAT ARE APPLICABLE TO THE OPERATION OF YOUR EQUIPMENT. FUTURE CHANGES IN PROHIBITORY RULES MAY ESTABLISH MORE STRINGENT REQUIREMENTS WHICH MAY SUPERSEDE THE CONDITIONS LISTED HERE.

FOR FURTHER INFORMATION PLEASE CONSULT YOUR SMAQMD RULEBOOK OR CONTACT THE SMAQMD FOR ASSISTANCE.

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AIR QUALITY MANAGEMENT DISTRICT

ATTACHMENT A

LIST OF APPROVED COATINGS
FOR THE D AND I CAN MANUFACTURING LINE
[P/O NO. 22884]

THE COATINGS LISTED BELOW HAVE BEEN APPROVED FOR **CONTINUOUS** USE IN THE D AND I CAN MANUFACTURING PROCESS.

THIS LIST DOES NOT INCLUDE COATINGS APPROVED FOR TRIAL USE. TRIAL COATINGS SHALL BE APPROVED ON A CASE-BY-CASE BASIS.

APPROVED COATINGS		
PRODUCT TYPE AND NAME	MAXIMUM ALLOWABLE VOC CONTENT	
	LB VOC/GAL OF COATING (LESS WATER AND EXEMPT SOLVENTS)	LB VOC/GAL OF SOLIDS
EXTERIOR WASHCOAT COATINGS		
1. DEXTER 440 SERIES	2.09	2.8
2. PPG 1026810	2.09	2.8
3. VALSPAR 27Q30AA	2.09	2.8
INTERIOR SPRAY COATINGS		
4. VALSPAR 500 SERIES	3.5	6.9
5. VALSPAR NO. 10Q25AB	3.5	6.9
6. TECHNICAL COATINGS NO. 12432A	3.5	6.9
7. ICI COATINGS NO. 642W SERIES	3.5	6.9
8. PPG 4553304	3.5	6.9