



# San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT

NOV 15 2010

Daniel Armagost  
Owens Brockway Glass Container Inc.  
14700 W. Schulte Rd  
Tracy, CA 95377-8628

**Re: Notice of Minor Title V Permit Modification  
District Facility # N-593  
Project # N-1103337**

Dear Mr. Armagost:

Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued Authority to Construct N-593-43-0 into the Title V operating permit. This project is for the installation of a new enclosed iron-chromite handling system served by a flex-kleen dust collector.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued Authority to Construct N-593-43-0, and the Title V compliance certification form. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Rupi Gill at (209) 557-6400.

Sincerely,

David Warner  
Director of Permit Services

DW:JH/dg

Enclosures

**Seyed Sadredin**  
Executive Director/Air Pollution Control Officer

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

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

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



# San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT

NOV 15 2010

Gerardo C. Rios, Chief  
Permits Office  
Air Division  
U.S. EPA - Region IX  
75 Hawthorne St  
San Francisco, CA 94105

Re: **Notice of Minor Title V Permit Modification**  
**District Facility # N-593**  
**Project # N-1103337**

Dear Mr. Rios:

Enclosed for you to review is an application for minor Title V permit modification for the facility identified above. Owens Brockway Glass Container Inc. is proposing a Title V minor permit modification to incorporate the recently issued Authority to Construct N-593-43-0 into the Title V operating permit. This project is for the installation of a new enclosed iron-chromite handling system served by a flex-kleen dust collector.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued Authority to Construct N-593-43-0, and the Title V compliance certification form. Please submit your written comments on this project within the 45-day comment period that begins on the date you receive this letter.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Rupi Gill at (209) 557-6400.

Sincerely,

David Warner  
Director of Permit Services

DW:JH/dg

Enclosures

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## **TITLE V APPLICATION REVIEW**

Minor Modification  
Project #: N-1103337

Engineer: James Harader  
Date: October 4, 2010

Facility Number: N-593  
Facility Name: Owens Brockway Glass Container  
Mailing Address: 14700 W. Schulte Rd  
Tracy, CA 95377-8628

Contact Name: Daniel G. Armagost  
Phone: (209) 836-8296

Responsible Official: Daniel Armagost  
Title: Plant Manager

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### **I. PROPOSAL**

Owens Brockway Glass Container is proposing a Title V minor permit modification to incorporate Authority to Construct N-593-43-0 into the existing Title V operating permit. This proposal resulted in an emissions increase of 0.00007 lb-PM<sub>10</sub>/day. Pursuant to the District's rounding policy, the District considers this to be an increase of 0.0 lb/day; however, a permit is required since this unit handles material that may contain chromium and since the unit is served by a dust collector.

The purpose of this evaluation is to identify all applicable requirements, determine if the facility will comply with the applicable requirements and to provide the legal and factual basis for the proposed revisions.

### **II. FACILITY LOCATION**

This facility is located at 14700 W. Schulte Rd in Tracy, CA.

### **III. EQUIPMENT DESCRIPTION**

**N-593-43-1:** FULLY ENCLOSED IRON CHROMITE MATERIAL HANDLING SYSTEM CONSISTING OF ONE 65 CU FT STORAGE BIN CONTROLLED BY A FLEX-KLEEN BAGHOUSE DUST COLLECTOR, ONE WEIGH SCREW FEEDER, ONE WEIGH HOPPER WITH LOAD CELLS, ONE COVERED METERING VIBRATORY FEEDER, AND AIR CONVEYANCE LINES

### **IV. SCOPE OF EPA AND PUBLIC REVIEW**

This change to a Title V permit is considered to be a minor modification and, as such, requires no public review.

### **V. APPLICABLE REQUIREMENTS**

District Rule 2520, Federally Mandated Operating Permits (Adopted June 21, 2001)

### **VI. DESCRIPTION OF PROPOSED MODIFICATIONS**

#### N-593-43-1

The applicant is proposing to incorporate Authority to Construct N-593-43-0 into their existing Title V permit. Authority to Construct, N-593-43-0, proposes to install a new iron chromite handling system to serve the existing glass melting furnace #22-C. Since this is new equipment, there is not an existing Permit to Operate for this unit.

Authority to Construct, N-593-43-0, Condition #1 requires the facility to submit an application to modify the Title V permit in the appropriate timeframe. This condition has been satisfied and will not be included on the new Permit to Operate.

No other changes are proposed during the conversion of this Authority to Construct into a Permit to Operate.

## **VII. COMPLIANCE**

In accordance with Rule 2520, 3.20, these modifications:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or Conditions;
3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
4. Do not seek to establish or change a permit term or Condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and Conditions include:
  - a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
  - b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; and
5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
6. Do not seek to consolidate overlapping applicable requirements.

In accordance with Rule 2520, the application meets the procedural requirements of section 11.4 by including;

1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
2. The source's suggested draft permit; and
3. Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used.

## **VIII. ATTACHMENTS**

- A. Proposed Modified Title V Operating Permit No. N-593-43-1
- B. Authority to Construct No. N-593-43-0
- C. Title V Compliance Certification Form

# ATTACHMENT A

Proposed Modified Title V Operating Permit No.  
N-593-43-1

# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-593-43-1

EXPIRATION DATE: 07/31/2012

## EQUIPMENT DESCRIPTION:

FULLY ENCLOSED IRON CHROMITE MATERIAL HANDLING SYSTEM CONSISTING OF ONE 65 CU FT STORAGE BIN CONTROLLED BY A FLEX-KLEEN BAGHOUSE DUST COLLECTOR, ONE WEIGH SCREW FEEDER, ONE WEIGH HOPPER WITH LOAD CELLS, ONE COVERED METERING VIBRATORY FEEDER, AND AIR CONVEYANCE LINES

## PERMIT UNIT REQUIREMENTS

1. Visible emissions shall not exceed 5% opacity for a period of periods aggregating more than three minutes in any one hour. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Material removed from the dust collector shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 4102]
3. 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 4102]
4. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
5. The dust collector shall be maintained and operated according to manufacturer's specifications. [District NSR Rule] Federally Enforceable Through Title V Permit
6. The cleaning frequency and duration for the dust collector shall be adjusted to optimize the control efficiency. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Replacement bags numbering at least 10% of the total number of bags in the dust collector shall be maintained on the premises. [District NSR Rule] Federally Enforceable Through Title V Permit
8. The dust collector shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District NSR Rule] Federally Enforceable Through Title V Permit
9. The differential pressure gauge reading range for the dust collector shall be established per manufacturer's recommendation at time of start up inspection. [District NSR Rule] Federally Enforceable Through Title V Permit
10. The PM10 emissions from the dust collector shall not exceed 0.02 gr/dscf. [District NSR Rule] Federally Enforceable Through Title V Permit
11. Differential operating pressure for the dust collector shall be monitored and recorded on each day that the dust collector operates. [District NSR Rule] Federally Enforceable Through Title V Permit
12. Records of all maintenance of the dust collector, including all change outs of filter media, shall be maintained. [District NSR Rule] Federally Enforceable Through Title V Permit
13. Records of inspections and repair for the dust collector shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 1070] Federally Enforceable Through Title V Permit
14. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

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

Facility Name: OWENS-BROCKWAY GLASS CONTAINER  
Location: 14700 W SCHULTE ROAD, TRACY, CA 95378  
N-593-43-1: Oct 11 2010 4:28PM - HARADERJ

# **ATTACHMENT B**

**Authority to Construct No.  
N-593-43-0**



**San Joaquin Valley**  
AIR POLLUTION CONTROL DISTRICT



**HEALTHY AIR LIVING™**

## AUTHORITY TO CONSTRUCT

PERMIT NO: N-593-43-0

ISSUANCE DATE: 08/12/2010

LEGAL OWNER OR OPERATOR: OWENS-BROCKWAY GLASS CONTAINER  
MAILING ADDRESS: 14700 W SCHULTE RD  
TRACY, CA 95376

LOCATION: 14700 W SCHULTE ROAD  
TRACY, CA 95376

**EQUIPMENT DESCRIPTION:**

FULLY ENCLOSED IRON CHROMITE MATERIAL HANDLING SYSTEM CONSISTING OF ONE 65 CU FT STORAGE BIN CONTROLLED BY A FLEX-KLEEN BAGHOUSE DUST COLLECTOR, ONE WEIGH SCREW FEEDER, ONE WEIGH HOPPER WITH LOAD CELLS, ONE COVERED METERING VIBRATORY FEEDER, AND AIR CONVEYANCE LINES

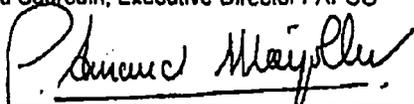
### CONDITIONS

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. Visible emissions shall not exceed 5% opacity for a period of periods aggregating more than three minutes in any one hour. [District NSR Rule]
3. Material removed from the dust collector shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 4102]
4. 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 4102]
5. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
6. The dust collector shall be maintained and operated according to manufacturer's specifications. [District NSR Rule]
7. The cleaning frequency and duration for the dust collector shall be adjusted to optimize the control efficiency. [District NSR Rule]
8. Replacement bags numbering at least 10% of the total number of bags in the dust collector shall be maintained on the premises. [District NSR Rule]

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

  
\_\_\_\_\_  
DAVID WARNER, Director of Permit Services

N-593-43-0 Aug 12 2010 8:22AM - TONG JUNE 11 2010 1:01 PM

9. The dust collector shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District NSR Rule]
10. The differential pressure gauge reading range for the dust collector shall be established per manufacturer's recommendation at time of start up inspection. [District NSR Rule]
11. The PM10 emissions from the dust collector shall not exceed 0.02 gr/dscf. [District NSR Rule]
12. Differential operating pressure for the dust collector shall be monitored and recorded on each day that the dust collector operates. [District NSR Rule]
13. Records of all maintenance of the dust collector, including all change outs of filter media, shall be maintained. [District NSR Rule]
14. Records of inspections and repair for the dust collector shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 1070]
15. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]

# **ATTACHMENT C**

**Title V Compliance Certification Form**

**San Joaquin Valley  
Unified Air Pollution Control District**

**TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM**

**I. TYPE OF PERMIT ACTION (Check appropriate box)**

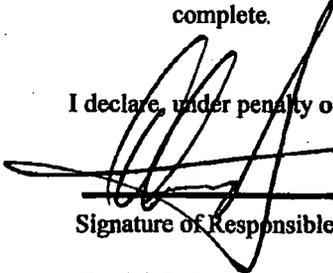
- SIGNIFICANT PERMIT MODIFICATION                       ADMINISTRATIVE  
 MINOR PERMIT MODIFICATION                                       AMENDMENT

COMPANY NAME: Owens-Brockway Glass Containers Inc.	FACILITY ID: N-593
1. Type of Organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name: Owens-Brockway Glass Containers Inc.	
3. Agent to the Owner:	

**II. COMPLIANCE CERTIFICATION (Read each statement carefully and initial all circles for confirmation):**

- DGA**  Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).
- DGA**  Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.
- DGA**  Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
- DGA**  Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:

  
 \_\_\_\_\_  
 Signature of Responsible Official

8/20/10  
 \_\_\_\_\_  
 Date

Daniel G. Armagost  
 \_\_\_\_\_

Name of Responsible Official (please print)

Plant Manager  
 \_\_\_\_\_

Title of Responsible Official (please print)