



OCT 19 2011

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

**Re: Notice of Minor Title V Permit Modification
District Facility # N-593
Project # N-1110341**

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-593-42-2 into the Title V operating permit. This applicant is proposing to increase the quantity of trona delivered to the trona receiving and storage operation to 120 tons/day.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued Authority to Construct N-593-42-2, emission increases, application, and previous Title V permit. 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. Rupl Gill at (209) 557-6400.

Sincerely,

David Warner
Director of Permit Services

DW:JH/st

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

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



OCT 19 2011

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-1110341

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 is proposing a Title V minor permit modification to incorporate the recently issued Authority to Construct N-593-42-2 into the Title V operating permit. This applicant is proposing to increase the quantity of trona delivered to the trona receiving and storage operation to 120 tons/day.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued Authority to Construct N-593-42-2, emission increases, application, and previous Title V permit. 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

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TITLE V APPLICATION REVIEW

Minor Modification
Project #: N-1110341

Engineer: James Harader
Date: March 21, 2011

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

I. PROPOSAL

Owens Brockway Glass Container is proposing a Title V minor permit modification to incorporate Authority to Construct N-593-42-2 into the existing Title V operating permit. The applicant proposed to increase the quantity of trona received by the trona storage operation to 120 tons/day. This proposal resulted in an increase in emissions less than 0.5 lb/day. Per District policy, an increase in emissions less than 0.5 lb/day is rounded to zero for NSR determinations.

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-593-42-3: TRONA/DRY REAGENT RECEIVING AND STORAGE OPERATION WITH A 2500 CUBIC FOOT STORAGE SILO SERVED BY A MET-PRO CORP FLEX-KLEEN VENT FILTER (OR EQUIVALENT)

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-593-42-3

The applicant is proposing to Incorporate Authority to Construct N-593-42-2 into the existing Title V permit. The unit is currently operating under Authority to Construct N-493-42-1, which the applicant has applied to convert via an administrative amendment. Therefore, the conditions of the new ATC (N-593-42-2) will be compared to the ATC that the unit is currently operating under.

Modified Conditions			
Previous TV ATC 42-1 Condition #	ATC 42-2 Condition #	New TV PTO Condition #	Proposed Changes to Conditions
10	11	7	The limit for the quantity of trona that can be delivered to the silo will be increased to 120 tons/day.
14	15	11	This condition has not been modified yet; however, the condition will be modified upon receiving the proper differential pressure gauge reading range from the District's Compliance staff.

Removed Conditions	
Previous ATC 42-1 Condition #	Proposed Changes to Conditions
No conditions will be removed from the TV permit.	

Added Conditions		
ATC 42-2 Condition #	New TV PTO Condition #	Proposed Changes to Conditions
No new Conditions have been added to the TV Permit.		

ATC Conditions that were not Added	
ATC 42-2 Condition #	Proposed Changes to Conditions
1	This condition requires the applicant to submit a minor modification application in accordance with the timeframe listed in District Rule 2520. This condition has been satisfied and will not be included on the new permit.
2	This condition requires Authority to Construct N-593-42-1 to be implemented prior to or concurrently to the new Authority to Construct. This condition will be satisfied prior to finalizing this project. Therefore, the condition will not be included on the new permit.
4 and 5	These requirements are already included on the facility-wide permit, N-593-0-3.

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 N-593-42-3
- B. Authority to Construct N-593-42-2
- C. Title V Compliance Certification Form
- D. Previous Authority to Construct N-593-42-1

ATTACHMENT A

Proposed Modified Title V Operating Permit
N-593-42-3

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-593-42-3

EXPIRATION DATE: 07/31/2012

EQUIPMENT DESCRIPTION:

TRONA/DRY REAGENT RECEIVING AND STORAGE OPERATION WITH A 2500 CUBIC FOOT STORAGE SILO SERVED BY A MET-PRO CORP FLEX-KLEEN VENT FILTER (OR EQUIVALENT)

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. Visible emissions from the exhaust of the bin vent filter shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
3. All ducting and control equipment shall be in good working order to prevent fugitive particulate emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
4. All filters shall be properly maintained and must be in place during the receiving of trona/dry reagent. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Replacement filters numbering at least 10% of the total number of filters in the largest bin vent filter using each type of filter shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The bin vent filter cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The quantity of Trona/dry reagent delivered to the silo shall not exceed 120 tons in any one day. [District Rule 2201]
8. PM10 emissions from the Trona/dry reagent receiving operation shall not exceed 0.00034 lb/ton. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Permittee shall keep a record of the daily quantity of Trona/dry reagent delivered to the silo, in tons. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The bin vent filter 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
11. The differential pressure gauge reading range for the bin vent filter shall be established per manufacturer's recommendation at time of start up inspection. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The differential operating pressure across the bin vent filter shall be monitored and recorded on each day that the baghouse operates. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Records of all maintenance of the bin vent filter, including all change outs of filter media, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
14. All records shall be retained 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 95376
N-593-42-3; Mar 21 2011 2:04PM - HARADERJ

ATTACHMENT B

Authorities to Construct
N-593-42-2



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

INSPECT PROGRAM PARTICIPANT: NO

EQUIPMENT DESCRIPTION:
 MODIFICATION OF TRONA/DRY REAGENT RECEIVING AND STORAGE OPERATION WITH A 2500 CUBIC FOOT STORAGE SILO SERVED BY A MET-PRO CORP FLEX-KLEEN VENT FILTER (OR EQUIVALENT) TO INCREASE THE QUANTITY OF TRONA DELIVERED TO THE SILO TO 120 TONS/DAY

CONDITIONS

1. {1829} 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. Authority to Construct N-593-42-1 shall be implemented prior to or concurrently with this Authority to Construct Permit. [District Rule 2201]
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
4. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4101]
5. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
6. Visible emissions from the exhaust of the bin vent filter shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
7. All ducting and control equipment shall be in good working order to prevent fugitive particulate emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
8. All filters shall be properly maintained and must be in place during the receiving of trona/dry reagent. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Replacement filters numbering at least 10% of the total number of filters in the largest bin vent filter using each type of filter shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The bin vent filter cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The quantity of Trona/dry reagent delivered to the silo shall not exceed 120 tons in any one day. [District Rule 2201]
12. PM10 emissions from the Trona/dry reagent receiving operation shall not exceed 0.00034 lb/ton. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Permittee shall keep a record of the daily quantity of Trona/dry reagent delivered to the silo, in tons. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The bin vent filter 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
15. The differential pressure gauge reading range for the bin vent filter shall be established per manufacturer's recommendation at time of start up inspection. [District Rule 2201] Federally Enforceable Through Title V Permit

16. The differential operating pressure across the bin vent filter shall be monitored and recorded on each day that the baghouse operates. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Records of all maintenance of the bin vent filter, including all change outs of filter media, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
18. All records shall be retained 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

INSPECTION
WORKSHEET

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)

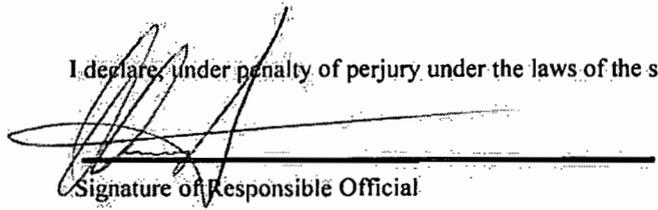
- SIGNIFICANT PERMIT MODIFICATION ADMINISTRATIVE
 MINOR PERMIT MODIFICATION AMENDMENT

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 Container Inc.	
3. Agent to the Owner:	

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

- 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).
- 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.
- Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
- 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

2/17/11

 Date

Daniel G. Armagost

 Name of Responsible Official (please print)

Plant Manager

 Title of Responsible Official (please print)

ATTACHMENT D

Previous Authority to Construct
N-593-42-1

INSPECTION
ISSUANCE DATE: 06/01/2010
WORKSHEET

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

INSPECT PROGRAM PARTICIPANT: NO

EQUIPMENT DESCRIPTION:
TRONA/DRY REAGENT RECEIVING AND STORAGE OPERATION WITH A 2500 CUBIC FOOT STORAGE SILO
SERVED BY A MET-PRO CORP FLEX-KLEEN VENT FILTER (OR EQUIVALENT)

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
5. Visible emissions from the exhaust of the bin vent filter shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
6. All ducting and control equipment shall be in good working order to prevent fugitive particulate emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
7. All filters shall be properly maintained and must be in place during the receiving of trona/dry reagent. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Replacement filters numbering at least 10% of the total number of filters in the largest bin vent filter using each type of filter shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The bin vent filter cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The quantity of trona/dry reagent received shall not exceed 4.97 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
11. PM10 emissions from the trona/dry reagent receiving operation shall not exceed 0.00034 lb/ton. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Permittee shall keep a record of the daily quantity of trona/dry reagent received, in tons. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The bin vent filter 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
14. The differential pressure gauge reading range for the bin vent filter shall be established per manufacturer's recommendation at time of start up inspection. [District Rule 2201] Federally Enforceable Through Title V Permit
15. The differential operating pressure across the bin vent filter shall be monitored and recorded on each day that the baghouse operates. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS FOR APPLICATION N-593-42-1

16. Records of all maintenance of the bin vent filter, including all change outs of filter media, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
17. All records shall be retained 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

**INSPECTION
WORKSHEET**