



JAN 15 2015

Mr. Farrell Smith
Greif Industrial Packaging & Services LLC
P O Box 2146
Merced, CA 95344

**Re: Notice of Minor Title V Permit Modification
District Facility # N-1330
Project # N-1142833**

Dear Mr. Smith:

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 ATCs N-1330-2-3, 3-2, 4-2, 5-2, 6-3, 7-7 and 15-3 into the Title V operating permit. The ATCs were issued to install permanent total enclosures (PTEs) around the spray paint booths, install a new 4.6 MMBtu/hr natural gas-fired regenerative thermal oxidizer (RTO), and establish a facility-wide VOC emissions limit of 19,999 pounds per year. Upon implementation of these ATCs, the facility will no longer be a major source.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued ATCs N-1330-2-3, 3-2, 4-2, 5-2, 6-3, 7-7 and 15-3, 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.

If you have any questions, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900.

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

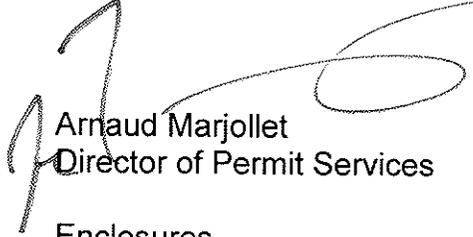
Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
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Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: 661-392-5500 FAX: 661-392-5585

Mr. Farrell Smith
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Thank you for your cooperation in this matter.

Sincerely,



Arnaud Marjollet
Director of Permit Services

Enclosures

cc: Gerardo C. Rios, EPA (w/enclosure) via email

TITLE V APPLICATION REVIEW

Minor Modification
Project #: N-1142833

Engineer: Jonah Aiyabei
Date: January 7, 2015

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

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

Responsible Official: Farrell Smith
Title: Plant Manager

I. PROPOSAL

Greif Industrial Packaging & Services LLC is proposing a Title V minor permit modification to incorporate the recently issued ATC Numbers N-1330-2-3, 3-2, 4-2, 5-2, 6-3, 7-7 and 15-3 into the Title V operating permit. The ATCs were issued to install permanent total enclosures (PTEs) around the spray paint booths, install a new 4.6 MMBtu/hr natural gas-fired regenerative thermal oxidizer (RTO), and establish a facility-wide VOC emissions limit of 19,999 pounds per year. Upon implementation of these ATCs, the facility will no longer be a major source.

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

The facility is located at 2400 Cooper Ave, Merced.

III. EQUIPMENT DESCRIPTION

N-1330-2-4: CAN AND COIL COATING OPERATION #1: HEAD AND BOTTOM PART INTERIOR COATING BOOTH IN A PERMAMENT TOTAL ENCLOSURE

(PTE); AND A 4.9 MMBTU/HR (DE-RATED) DIRECT-FIRED NATURAL GAS WICKET PAINT CURING OVEN. THE BOOTH ENCLOSURE AND THE CURING OVEN ARE VENTED TO A 4.6 MMBTU/HR NATURAL GAS-FIRED REGENERATIVE THERMAL OXIDIZER (RTO) SHARED AMONG PERMITS N-1330-2, '-3, '-4, '-5, '-6 AND '-7

N-1330-3-3: CAN AND COIL COATING OPERATION #2 : BINKS EXTERIOR BODY BOOTH IN A PERMAMENT TOTAL ENCLOSURE (PTE); AND A 3.9 MMBTU/HR DIRECT-FIRED NATURAL GAS BLUE SURF PAINT CURING OVEN SHARED BY PERMITS N-1330-3 AND '-6. THE BOOTH ENCLOSURE AND THE CURING OVEN ARE VENTED TO A COMMON 4.6 MMBTU/HR NATURAL GAS-FIRED REGENERATIVE THERMAL OXIDIZER (RTO) SHARED AMONG PERMITS N-1330-2, '-3, '-4, '-5, '-6 AND '-7

N-1330-4-3: CAN AND COIL COATING OPERATION #3: CENTRIFUGAL COATER (#2) AND RHEEM DESIGN BOOTH IN A PERMAMENT TOTAL ENCLOSURE (PTE); AND A 4.9 MMBTU/HR (DE-RATED) SHELL PAINT CURING OVEN SHARED BY PERMITS N-1330-4 AND 5. THE BOOTH ENCLOSURE AND THE CURING OVEN ARE VENTED TO A 4.6 MMBTU/HR NATURAL GAS-FIRED REGENERATIVE THERMAL OXIDIZER (RTO) SHARED AMONG PERMITS N-1330-2, '-3, '-4, '-5, '-6 AND '-7

N-1330-5-3: CAN AND COIL COATING OPERATION #4: CENTRIFUGAL COATER (#1) IN A PERMAMENT TOTAL ENCLOSURE (PTE); AND A 4.9 MMBTU/HR (DE-RATED) SHELL PAINT CURING OVEN SHARED BY PERMITS N-1330-4 AND 5. THE BOOTH ENCLOSURE AND THE CURING OVEN ARE VENTED TO A 4.6 MMBTU/HR NATURAL GAS-FIRED REGENERATIVE THERMAL OXIDIZER (RTO) SHARED AMONG PERMITS N-1330-2, '-3, '-4, '-5, '-6 AND '-7

N-1330-6-4: CAN AND COIL COATING OPERATION #5: EXTERIOR HEAD PARTS COATING BOOTH IN A PERMAMENT TOTAL ENCLOSURE (PTE); AND A 3.9 MMBTU/HR DIRECT-FIRED NATURAL GAS BLUE SURF OVEN SHARED BY PERMITS N-1330-3 AND '-6. THE BOOTH ENCLOSURE AND THE CURING OVEN ARE VENTED TO A COMMON 4.6 MMBTU/HR NATURAL GAS-FIRED REGENERATIVE THERMAL OXIDIZER (RTO) SHARED AMONG PERMITS N-1330-2, '-3, '-4, '-5, '-6 AND '-7

N-1330-7-8: CAN AND COIL COATING OPERATION #6: HEAD AND BOTTOM PART SHEET ROLL COATER SYSTEM CONSISTING OF A WAGNER ROLL COAT MACHINE IN A PERMAMENT TOTAL ENCLOSURE (PTE) AND A 12 MMBTU/HR WAGNER PAINT CURING OVEN WITH MAXON NP BURNER SYSTEM. THE ENCLOSURE AND THE CURING OVEN ARE VENTED TO A 4.6 MMBTU/HR NATURAL GAS-FIRED REGENERATIVE THERMAL OXIDIZER (RTO) SHARED AMONG PERMITS N-1330-2, '-3, '-4, '-5, '-6 AND '-7

N-1330-15-4: 8.4 MMBTU/HR HURST MODEL S4-200-150 BOILER WITH AN INDUSTRIAL COMBUSTION LOW NOX BURNER AND INDUCED FLUE GAS RECIRCULATION

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

Greif has proposed the following modifications to the existing Can and Coil Coating operations:

1. Install permanent total enclosures (PTEs) around the spray paint booths under permits N-1330-2, '-3, '-4, '-5 and '-6;
2. Install a new 4.6 MMBtu/hr natural gas-fired regenerative thermal oxidizer (RTO) that will serve PTEs (item 1) and paint curing ovens including Wagner oven, Wicket oven, Shell oven, and Blue Surf ovens covered under permits N-1330-7, '-8, '-9 and '-10. Note that VOC capture and Wagner oven under N-1330-7 are vented to a 2.6 MMBtu/hr direct flame incinerator; Wicket oven and Shell oven under N-1330-8 and '-9 respectively, each vented to its own 5 MMBtu/hr (each) direct flame incinerator; and the Blue Surf oven does not have a fume incinerator even though its permit N-1330-10-0 requires the use of a fume incinerator.
3. Establish facility-wide VOC emission limits of 19,999 pounds per year. This will require opening of permit N-1330-15 for the boiler in addition to permits N-1330-2 to '-7.
4. Associate each curing oven with its respective coating operation, and delete Permits to Operate (PTOs) N-1330-8, '-9 and '-10. These PTOs will be deleted during the final action stage of this minor modification project.
5. Replace the quarterly VOC limits that were established in 1992 under project N920292 in permits N-1330-2, '-6 and '-7 with an appropriate annual limits.

Review of the application review under project N920292 indicates that the quarterly VOC limits were established to offset increase in VOC emissions due to paint use in the Roll Coat system under permit N-1330-7. The

applicant states that the increase in throughput for the sheet roller was permitted to meet the increasing demand for tin-plated Sterilpac steel drum used in the food storage industry. Since 1992, alternative packaging including Greif's ISO open head steel drum have reduced the need for Sterilpac drums which has resulted in a sharp decline in the Roll Coat operation. Due to this operational change, VOC emissions for which these limitations were intended to offset have decreased significantly; in addition, another characteristic of the food storage industry market was seasonal variability due to growing season cycles. Since 1992, Greif's clients have become more diversified which has removed the seasonal variation in the production. Furthermore, the facility is proposing to establish a facility-wide VOC limit of 19,999 lb/year, which is below the VOC offset threshold of 20,000 lb/year. Therefore, these quarterly emission limits are no longer necessary and will be removed from permits N-1330-2, '6 and 7.

The current permits also contain quarterly NO_x emission limits that are solely established to stay consistent with the quarterly VOC emission limits. There is no underlying basis (such as BACT or Offset) for the NO_x emission limits on a quarterly basis. Therefore, if necessary, these limits will also be stated in annual terms to stay consistent with the proposed VOC limits.

The permit conditions will be modified as explained under each permit unit below:

N-1330-2-4 and 6-4:

Permit conditions 1 and 2 on the current Permit to Operate were replaced by permit conditions 5 and 6 on the proposed Permit to Operate. These conditions require that exhaust fans shall be switched on prior to the start of paint spraying operations, and that all filters shall be properly maintained and shall be in place during spraying operations.

Permit condition 3 on the current Permit to Operate was replaced by permit conditions 3 and 4 on the proposed Permit to Operate. These conditions specify the particulate matter concentration and the visible emissions limits.

Permit conditions 4 and 5 on the current Permit to Operate were replaced by permit condition 7 on the proposed Permit to Operate. This condition specifies the daily and annual VOC limit. The existing quarterly VOC emission limits have been replaced with an annual limit. In addition, the new condition also specifies a daily and an annual PM₁₀ emissions limit.

Permit condition 6 on the current Permit to Operate was replaced by permit condition 29 on the proposed Permit to Operate. This condition specifies the VOC content limits of coatings used.

Permit conditions 7 and 10 on the current Permit to Operate were replaced by permit condition 28 on the proposed Permit to Operate. This condition specifies the VOC content limits of solvents used.

Permit conditions 8 and 9 on the current Permit to Operate were deleted. These conditions refer to requirements that are no longer in the current version of the rule.

Permit condition 11 on the current Permit to Operate was replaced by permit condition 31 on the proposed Permit to Operate. This condition requires the storage or disposal of solvents, solvent-laden cleaning materials, coatings, adhesives, catalysts, thinners, etc. in closed non-absorbent and non-leaking containers.

Permit condition 12 on the current Permit to Operate was replaced by permit condition 34 on the proposed Permit to Operate. This condition specifies the allowable coating application methods.

Permit condition 13 on the current Permit to Operate was replaced by permit condition 36 on the proposed Permit to Operate. This condition requires that a current list of coatings in use shall be maintained.

Permit condition 14 on the current Permit to Operate was replaced by permit condition 38 on the proposed Permit to Operate. This condition requires that a current list of solvents in use shall be maintained.

Permit condition 15 on the current Permit to Operate was replaced by permit condition 37 on the proposed Permit to Operate. This condition specifies recordkeeping requirements of coatings in use.

Permit condition 16 on the current Permit to Operate was replaced by permit condition 39 on the proposed Permit to Operate. This condition specifies recordkeeping requirements for solvents in use.

Permit condition 17 on the current Permit to Operate was replaced by permit condition 44 on the proposed Permit to Operate. This condition specifies the records retention and availability requirements.

Permit condition 1 was added to the proposed Permit to Operate to specify the facility-wide VOC emissions limit.

Permit condition 2 was added to the proposed Permit to Operate to specify the general nuisance prohibition.

Permit condition 8 was added to the proposed Permit to Operate to specify the VOC emissions calculation method.

Permit condition 9 was added to the proposed Permit to Operate to specify the PM10 emissions calculation method.

Permit condition 10 was added to the proposed Permit to Operate to specify requirements for derating of the curing oven.

Permit condition 11 was added to the proposed Permit to Operate to specify emission limits for natural gas combustion in the curing oven.

Permit condition 12 was added to the proposed Permit to Operate to specify the combined daily VOC emissions limit for permit units N-1330-2, -3, -4, -5, -6, and -7.

Permit condition 13 was added to the proposed Permit to Operate to specify emission limits for natural gas combustion in the RTO.

Permit condition 14 was added to the proposed Permit to Operate to specify the capture and control efficiency of the VOC emissions control system.

Permit condition 15 was added to the proposed Permit to Operate to specify the pressure differential range for the booth exhaust filters and the PTE.

Permit condition 16 was added to the proposed Permit to Operate to specify requirements for continuous pressure differential measurement.

Permit conditions 17 through 19 were added to the proposed Permit to Operate to specify RTO operation requirements, including minimum chamber temperature and continuous chamber temperature measurement.

Permit conditions 20, 21 and 23 through 27 were added to the proposed Permit to Operate to specify general source testing requirements, including the applicable source testing methods.

Permit condition 22 was added to the proposed Permit to Operate to specify the source testing frequency for the RTO's control efficiency.

Permit condition 30 was added to the proposed Permit to Operate to specify conditions under which coatings and solvents with VOC limits exceeding those specified in the rule may be used.

Permit conditions 32 and 33 were added to the proposed Permit to Operate to specify that coatings shall be applied with properly operating equipment, and

such equipment shall be operated according the procedures specified by the manufacturer.

Permit condition 35 was added to the proposed Permit to Operate to specify the compliance demonstration requirement for HVLP spray guns manufactured prior to January 1, 1996.

Permit conditions 40 and 41 were added to the proposed Permit to Operate to specify recordkeeping and violation reporting requirements for the PTE and RTO operating parameters.

Permit conditions 42 and 43 were added to the proposed Permit to Operate to specify Operation and Maintenance (O/M) Plan requirements.

N-1330-3-3:

Permit condition 1 on the current Permit to Operate was replaced by permit condition 28 on the proposed Permit to Operate. This condition specifies the VOC content limits of coatings used.

Permit conditions 2 and 5 on the current Permit to Operate were replaced by permit condition 27 on the proposed Permit to Operate. This condition specifies the VOC content limits of solvents used.

Permit conditions 3 and 4 on the current Permit to Operate were deleted. These conditions refer to requirements that are no longer in the current version of the rule.

Permit condition 6 on the current Permit to Operate was replaced by permit condition 30 on the proposed Permit to Operate. This condition requires the storage or disposal of solvents, solvent-laden cleaning materials, coatings, adhesives, catalysts, thinners, etc. in closed non-absorbent and non-leaking containers.

Permit condition 7 on the current Permit to Operate was replaced by permit condition 33 on the proposed Permit to Operate. This condition specifies the allowable coating application methods.

Permit condition 8 on the current Permit to Operate was replaced by permit condition 35 on the proposed Permit to Operate. This condition requires that a current list of coatings in use shall be maintained.

Permit condition 9 on the current Permit to Operate was replaced by permit condition 37 on the proposed Permit to Operate. This condition requires that a current list of solvents in use shall be maintained.

Permit condition 10 on the current Permit to Operate was replaced by permit condition 36 on the proposed Permit to Operate. This condition specifies recordkeeping requirements of coatings in use.

Permit condition 11 on the current Permit to Operate was replaced by permit condition 38 on the proposed Permit to Operate. This condition specifies recordkeeping requirements for solvents in use.

Permit condition 12 on the current Permit to Operate was replaced by permit condition 43 on the proposed Permit to Operate. This condition specifies the records retention and availability requirements.

Permit condition 1 was added to the proposed Permit to Operate to specify the facility-wide VOC emissions limit.

Permit condition 2 was added to the proposed Permit to Operate to specify the general nuisance prohibition.

Permit condition 3 was added to the proposed Permit to Operate to specify the particulate matter concentration limit.

Permit condition 4 was added to the proposed Permit to Operate to specify the visible emissions limit.

Permit condition 5 was added to the proposed Permit to Operate to specify that exhaust fans shall be switched on prior to the start of paint spraying operations.

Permit condition 6 was added to the proposed Permit to Operate to specify that filters shall be properly maintained and shall be in place during paint spraying operations.

Permit condition 8 was added to the proposed Permit to Operate to specify the VOC emissions calculation method.

Permit condition 9 was added to the proposed Permit to Operate to specify the PM10 emissions calculation method.

Permit condition 10 was added to the proposed Permit to Operate to specify emission limits for natural gas combustion in the curing oven.

Permit condition 11 was added to the proposed Permit to Operate to specify the combined daily VOC emissions limit for permit units N-1330-2, -3, -4, -5, -6, and -7.

Permit condition 12 was added to the proposed Permit to Operate to specify emission limits for natural gas combustion in the RTO.

Permit condition 13 was added to the proposed Permit to Operate to specify the capture and control efficiency of the VOC emissions control system.

Permit condition 14 was added to the proposed Permit to Operate to specify the pressure differential range for the booth exhaust filters and the PTE.

Permit condition 15 was added to the proposed Permit to Operate to specify requirements for continuous pressure differential measurement.

Permit conditions 16 through 18 were added to the proposed Permit to Operate to specify RTO operation requirements, including minimum chamber temperature and continuous chamber temperature measurement.

Permit conditions 19, 20 and 22 through 26 were added to the proposed Permit to Operate to specify general source testing requirements, including the applicable source testing methods.

Permit condition 21 was added to the proposed Permit to Operate to specify the source testing frequency for the RTO's control efficiency.

Permit condition 29 was added to the proposed Permit to Operate to specify conditions under which coatings and solvents with VOC limits exceeding those specified in the rule may be used.

Permit conditions 31 and 32 were added to the proposed Permit to Operate to specify that coatings shall be applied with properly operating equipment, and such equipment shall be operated according to the procedures specified by the manufacturer.

Permit condition 34 was added to the proposed Permit to Operate to specify the compliance demonstration requirement for HVLP spray guns manufactured prior to January 1, 1996.

Permit conditions 39 and 40 were added to the proposed Permit to Operate to specify recordkeeping and violation reporting requirements for the PTE and RTO operating parameters.

Permit conditions 41 and 42 were added to the proposed Permit to Operate to specify Operation and Maintenance (O/M) Plan requirements.

N-1330-4-3 and 5-3:

Permit condition 1 on the current Permit to Operate was replaced by permit condition 29 on the proposed Permit to Operate. This condition specifies the VOC content limits of coatings used.

Permit conditions 2 and 5 on the current Permit to Operate were replaced by permit condition 28 on the proposed Permit to Operate. This condition specifies the VOC content limits of solvents used.

Permit conditions 3 and 4 on the current Permit to Operate were deleted. These conditions refer to requirements that are no longer in the current version of the rule.

Permit condition 6 on the current Permit to Operate was replaced by permit condition 31 on the proposed Permit to Operate. This condition requires the storage or disposal of solvents, solvent-laden cleaning materials, coatings, adhesives, catalysts, thinners, etc. in closed non-absorbent and non-leaking containers.

Permit condition 7 on the current Permit to Operate was replaced by permit condition 34 on the proposed Permit to Operate. This condition specifies the allowable coating application methods.

Permit condition 8 on the current Permit to Operate was replaced by permit condition 36 on the proposed Permit to Operate. This condition requires that a current list of coatings in use shall be maintained.

Permit condition 9 on the current Permit to Operate was replaced by permit condition 38 on the proposed Permit to Operate. This condition requires that a current list of solvents in use shall be maintained.

Permit condition 10 on the current Permit to Operate was replaced by permit condition 37 on the proposed Permit to Operate. This condition specifies recordkeeping requirements of coatings in use.

Permit condition 11 on the current Permit to Operate was replaced by permit condition 39 on the proposed Permit to Operate. This condition specifies recordkeeping requirements for solvents in use.

Permit condition 12 on the current Permit to Operate was replaced by permit condition 44 on the proposed Permit to Operate. This condition specifies the records retention and availability requirements.

Permit condition 1 was added to the proposed Permit to Operate to specify the facility-wide VOC emissions limit.

Permit condition 2 was added to the proposed Permit to Operate to specify the general nuisance prohibition.

Permit condition 3 was added to the proposed Permit to Operate to specify the particulate matter concentration limit.

Permit condition 4 was added to the proposed Permit to Operate to specify the visible emissions limit.

Permit condition 5 was added to the proposed Permit to Operate to specify that exhaust fans shall be switched on prior to the start of paint spraying operations.

Permit condition 6 was added to the proposed Permit to Operate to specify that filters shall be properly maintained and shall be in place during paint spraying operations.

Permit condition 8 was added to the proposed Permit to Operate to specify the VOC emissions calculation method.

Permit condition 9 was added to the proposed Permit to Operate to specify the PM10 emissions calculation method.

Permit condition 10 was added to the proposed Permit to Operate to specify requirements for derating of the curing oven.

Permit condition 11 was added to the proposed Permit to Operate to specify emission limits for natural gas combustion in the curing oven.

Permit condition 12 was added to the proposed Permit to Operate to specify the combined daily VOC emissions limit for permit units N-1330-2, -3, -4, -5, -6, and -7.

Permit condition 13 was added to the proposed Permit to Operate to specify emission limits for natural gas combustion in the RTO.

Permit condition 14 was added to the proposed Permit to Operate to specify the capture and control efficiency of the VOC emissions control system.

Permit condition 15 was added to the proposed Permit to Operate to specify the pressure differential range for the booth exhaust filters and the PTE.

Permit condition 16 was added to the proposed Permit to Operate to specify requirements for continuous pressure differential measurement.

Permit conditions 17 through 19 were added to the proposed Permit to Operate to specify RTO operation requirements, including minimum chamber temperature and continuous chamber temperature measurement.

Permit conditions 20, 21 and 23 through 27 were added to the proposed Permit to Operate to specify general source testing requirements, including the applicable source testing methods.

Permit condition 22 was added to the proposed Permit to Operate to specify the source testing frequency for the RTO's control efficiency.

Permit condition 30 was added to the proposed Permit to Operate to specify conditions under which coatings and solvents with VOC limits exceeding those specified in the rule may be used.

Permit conditions 32 and 33 were added to the proposed Permit to Operate to specify that coatings shall be applied with properly operating equipment, and such equipment shall be operated according the procedures specified by the manufacturer.

Permit condition 35 was added to the proposed Permit to Operate to specify the compliance demonstration requirement for HVLP spray guns manufactured prior to January 1, 1996.

Permit conditions 40 and 41 were added to the proposed Permit to Operate to specify recordkeeping and violation reporting requirements for the PTE and RTO operating parameters.

Permit conditions 42 and 43 were added to the proposed Permit to Operate to specify Operation and Maintenance (O/M) Plan requirements.

N-1330-7-7:

Permit conditions 1 through 5 on the current Permit to Operate were deleted. These conditions specify various requirements for the afterburner, which has been removed.

Permit condition 6 on the current Permit to Operate was replaced by permit condition 3 on the proposed Permit to Operate. This condition specifies the PM10 emissions concentration limit.

Permit conditions 7, 11 and 13 on the current Permit to Operate were replaced by condition 6 on the proposed Permit to Operate. These conditions specify the PM10 and VOC emission limits.

Permit conditions 8 through 10 and 12 on the current Permit to Operate were replaced by condition 9, 10 and 12 on the proposed Permit to Operate. These conditions specify the NOx, CO, and SOx emission limits from fuel combustion.

Permit condition 14 on the current Permit to Operate was replaced by permit condition 13 on the proposed Permit to Operate. This condition specifies the destruction efficiency for the VOC control device.

Permit conditions 15 and 18 on the current Permit to Operate was replaced by permit condition 38 on the proposed Permit to Operate. This condition specifies the VOC content limits of solvents used.

Permit conditions 16 and 17 on the current Permit to Operate were deleted. These conditions refer to requirements that are no longer in the current version of the rule.

Permit condition 19 on the current Permit to Operate was replaced by permit condition 40 on the proposed Permit to Operate. This condition requires the storage or disposal of solvents, solvent-laden cleaning materials, coatings, adhesives, catalysts, thinners, etc. in closed non-absorbent and non-leaking containers.

Permit condition 20 on the current Permit to Operate was replaced by permit condition 43 on the proposed Permit to Operate. This condition specifies the allowable coating application methods.

Permit condition 21 on the current Permit to Operate was replaced by permit condition 45 on the proposed Permit to Operate. This condition requires that a current list of coatings in use shall be maintained.

Permit condition 22 on the current Permit to Operate was replaced by permit condition 47 on the proposed Permit to Operate. This condition requires that a current list of solvents in use shall be maintained.

Permit conditions 23, 24, 26, and 27 on the current Permit to Operate were deleted. These conditions specify various requirements for the afterburner, which has been removed.

Permit condition 25 on the current Permit to Operate was replaced by permit conditions 51 and 52 on the proposed Permit to Operate. These conditions specify Operation and Maintenance (O/M) Plan requirements.

Permit condition 28 on the current Permit to Operate was replaced by permit condition 21 on the proposed Permit to Operate. This condition requires that source testing shall be conducted using the methods and procedures approved by the District.

Permit condition 29 on the current Permit to Operate was replaced by permit condition 33 on the proposed Permit to Operate. This condition requires that the results of each source test shall be submitted to the District within 60 days after the source test.

Permit condition 30 on the current Permit to Operate was replaced by permit condition 26 on the proposed Permit to Operate. This condition specifies the test method for determination of the capture efficiency for the VOC emissions control system.

Permit condition 31 on the current Permit to Operate was replaced by permit condition 27 on the proposed Permit to Operate. This condition specifies the test method for determination of the control efficiency for the VOC emissions control system.

Permit conditions 32 through 34 on the current Permit to Operate were deleted. These conditions specify various requirements for the afterburner, which has been removed.

Permit condition 35 on the current Permit to Operate was replaced by permit condition 46 on the proposed Permit to Operate. This condition specifies recordkeeping requirements of coatings in use.

Permit condition 36 on the current Permit to Operate was replaced by permit condition 48 on the proposed Permit to Operate. This condition specifies recordkeeping requirements for solvents in use.

Permit conditions 37 on the current Permit to Operate was deleted. This condition specifies recordkeeping requirements for the afterburner chamber temperature. Since the afterburner has been removed, this condition is no longer applicable.

Permit condition 38 on the current Permit to Operate was replaced by permit condition 56 on the proposed Permit to Operate. This condition specifies the records retention and availability requirements.

Permit conditions 39 through 41 on the current Permit to Operate were deleted. These are Compliance Assurance Monitoring (40 CFR Part 64) requirements which will no longer be applicable because the facility's potential to emit has been reduced below the major source threshold.

Permit condition 1 was added to the proposed Permit to Operate to specify the facility-wide VOC emissions limit.

Permit condition 2 was added to the proposed Permit to Operate to specify the general nuisance prohibition.

Permit condition 4 was added to the proposed Permit to Operate to specify the visible emissions limit.

Permit condition 5 was added to the proposed Permit to Operate to specify that exhaust fans shall be switched on prior to the start of paint spraying operations.

Permit condition 7 was added to the proposed Permit to Operate to specify the VOC emissions calculation method.

Permit condition 8 was added to the proposed Permit to Operate to specify the PM10 emissions calculation method.

Permit condition 11 was added to the proposed Permit to Operate to specify the combined daily VOC emissions limit for permit units N-1330-2, -3, -4, -5, -6, and -7.

Permit condition 14 was added to the proposed Permit to Operate to specify the pressure differential range for the roll coat system.

Permit condition 15 was added to the proposed Permit to Operate to specify requirements for continuous pressure differential measurement.

Permit conditions 16 through 19 were added to the proposed Permit to Operate to specify RTO operation requirements, including minimum chamber temperature, emissions reduction efficiency, and continuous chamber temperature measurement.

Permit condition 20 was added to the proposed Permit to Operate to specify that sampling facilities for source testing shall be provided in accordance with District Rule 1081.

Permit condition 22 was added to the proposed Permit to Operate to specify the source testing frequency for the RTO's control efficiency.

Permit condition 23 was added to the proposed Permit to Operate to specify the source testing frequency for NO_x and CO emissions from the curing oven.

Permit condition 24 was added to the proposed Permit to Operate to specify that all emissions shall be made with the unit operating at either conditions

representative of normal operations or conditions specified in the Permit to Operate.

Permit condition 25 was added to the proposed Permit to Operate to specify the averaging requirements for source test results.

Permit conditions 28 through 32 were added to the proposed Permit to Operate to specify source testing methods.

Permit conditions 34 through 36 and 53 were added to the proposed Permit to Operate to specify alternate monitoring requirements for NOx and CO emissions.

Permit conditions 34 through 36 and 53 were added to the proposed Permit to Operate to specify alternate monitoring requirements for NOx and CO emissions.

Permit condition 37 was added to the proposed Permit to Operate to specify the VOC content limits of coatings used.

Permit condition 39 was added to the proposed Permit to Operate to specify conditions under which coatings and solvents with VOC limits exceeding those specified in the rule may be used.

Permit conditions 41 and 42 were added to the proposed Permit to Operate to specify that coatings shall be applied with properly operating equipment, and such equipment shall be operated according to the procedures specified by the manufacturer.

Permit condition 44 was added to the proposed Permit to Operate to specify the compliance demonstration requirement for HVLP spray guns manufactured prior to January 1, 1996.

Permit conditions 49 and 50 were added to the proposed Permit to Operate to specify recordkeeping and violation reporting requirements for the PTE and RTO operating parameters.

Permit condition 54 was added to the proposed Permit to Operate to specify recordkeeping requirements for fuel used in the oven.

Permit condition 55 was added to the proposed Permit to Operate to specify the units in which source test results are to be reported.

N-1330-15-3:

Permit condition 1 on the current Permit to Operate was replaced by permit condition 2 on the proposed Permit to Operate. This condition requires that all

equipment shall be maintained in good operating condition and in a manner to minimize emission of air contaminants.

Permit condition 2 on the current Permit to Operate was replaced by condition 5 on the proposed Permit to Operate. This condition specifies the particulate matter emissions concentration limit.

Permit condition 3 on the current Permit to Operate was replaced by permit condition 6 on the proposed Permit to Operate. This condition requires that the unit shall be fired on only on PUC-regulated natural gas.

Permit condition 4 on the current Permit to Operate was replaced by permit condition 7 on the proposed Permit to Operate. This condition requires that the unit shall be equipped with a fuel meter.

Permit condition 5 on the current Permit to Operate was replaced by permit condition 8 on the proposed Permit to Operate. This condition specifies the maximum annual heat input limit.

Permit condition 6 on the current Permit to Operate was replaced by permit condition 9 on the proposed Permit to Operate. This condition requires the payment of annual emission fees pursuant to the requirements of District Rule 4320.

Permit condition 7 on the current Permit to Operate was replaced by permit condition 10 on the proposed Permit to Operate. This condition specifies the emission rates.

Permit conditions 8 through 12 on the current Permit to Operate were replaced by permit conditions 23 through 27 on the proposed Permit to Operate. These conditions specify the periodic monitoring requirements for the flue gas recirculation valve setting.

Permit conditions 13 and 14 on the current Permit to Operate were replaced by permit conditions 13 and 14 on the proposed Permit to Operate. These conditions specify tune-up requirements.

Permit condition 15 on the current Permit to Operate was replaced by permit condition 20 on the proposed Permit to Operate. This condition requires that all emissions measurements shall be made with the unit operating at conditions representative of normal operations or conditions specified in the Permit to Operate.

Permit condition 16 on the current Permit to Operate was replaced by permit condition 12 on the proposed Permit to Operate. This condition specifies the source testing frequency for NOx and CO emissions.

Permit condition 17 on the current Permit to Operate was replaced by permit condition 19 on the proposed Permit to Operate. This condition requires that the source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance.

Permit condition 18 on the current Permit to Operate was replaced by permit condition 11 on the proposed Permit to Operate. This condition requires that source testing shall be conducted using the methods and procedures approved by the District, the District must be notified at least 30 days prior to the source test, and a source test plan must be submitted for approval at least 15 days prior to the test.

Permit conditions 19 through 21 on the current Permit to Operate were replaced by permit conditions 15 through 17 on the proposed Permit to Operate. These conditions specify the test method for NOx, CO and stack oxygen.

Permit condition 20 on the current Permit to Operate was replaced by permit condition 10 on the proposed Permit to Operate. This condition specifies the emission rates.

Permit condition 22 on the current Permit to Operate was replaced by permit condition 21 on the proposed Permit to Operate. This condition specifies the averaging requirements for source test results.

Permit condition 23 on the current Permit to Operate was replaced by permit condition 22 on the proposed Permit to Operate. This condition requires that source test results shall be submitted to the District within 60 days after the test.

Permit condition 24 on the current Permit to Operate was replaced by permit condition 28 on the proposed Permit to Operate. This condition requires that the fuel sulfur content shall be determined annually, or demonstrated via equivalent means.

Permit condition 25 on the current Permit to Operate was replaced by permit condition 29 on the proposed Permit to Operate. This condition requires that monthly and annual heat input records shall be maintained.

Permit condition 26 on the current Permit to Operate was replaced by permit condition 30 on the proposed Permit to Operate. This condition specifies the records retention period.

Permit condition 27 on the current Permit to Operate was deleted. This condition was redundant as its requirements (maintain records of annual heat input; retain records for 5 years) were already stated in conditions 25 and 26.

Permit condition 28 on the current Permit to Operate was deleted. This condition was redundant as its requirement (determine fuel sulfur content) was already stated in condition 24.

Permit condition 1 was added to the proposed Permit to Operate to specify the facility-wide VOC emissions limit.

Permit condition 3 was added to the proposed Permit to Operate to specify the general nuisance prohibition.

Permit condition 4 was added to the proposed Permit to Operate to specify the visible emissions limit.

Permit conditions 17 and 18 were added to the proposed Permit to Operate to specify source testing methods.

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.s N-1330-2-4, -3-3, -4-3, -5-3, -6-4, -7-8, and -15-4
- B. Authorities to Construct No.s N-1330-2-3, -3-2, -4-2, -5-2, -6-3, -7-7, and -15-3
- C. Emissions Increases
- D. Application
- E. Previous Title V Operating Permit No.s N-1330-2-2, -3-1, -4-1, -5-1, -6-2, -7-5, and -15-2

ATTACHMENT A

Proposed Modified Title V Operating Permit

No.s N-1330-2-4, -3-3, -4-3, -5-3, -6-4, -7-8, and -15-4

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1330-2-4

EXPIRATION DATE: 09/30/2017

EQUIPMENT DESCRIPTION:

CAN AND COIL COATING OPERATION #1: HEAD AND BOTTOM PART INTERIOR COATING BOOTH IN A PERMANENT TOTAL ENCLOSURE (PTE); AND A 4.9 MMBTU/HR (DE-RATED) DIRECT-FIRED NATURAL GAS WICKET PAINT CURING OVEN. THE BOOTH ENCLOSURE AND THE CURING OVEN ARE VENTED TO A 4.6 MMBTU/HR NATURAL GAS-FIRED REGENERATIVE THERMAL OXIDIZER (RTO) SHARED AMONG PERMITS N-1330-2, '-3, '-4, '-5, '-6 AND '-7

PERMIT UNIT REQUIREMENTS

1. VOC emissions from the entire stationary source shall not exceed 19,999 pounds in any 12 consecutive month rolling period. The permittee shall maintain monthly records of VOC emissions to demonstrate compliance with this condition. [District Rule 2201] Federally Enforceable Through Title V Permit
2. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
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. Exhaust fans shall be switched on prior to the start of paint spraying operations. [District Rule 2201] Federally Enforceable Through Title V Permit
6. All filters shall be properly maintained and must be in place during the painting operation. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Emissions from the coating operation (paint and solvent use) shall not exceed any of following limits: 26.4 lb-VOC/day and 3,682 lb-VOC/year; and 5.0 lb-PM10/day and 699 lb-PM10/year. [District Rule 2201] Federally Enforceable Through Title V Permit
8. VOC emissions shall be estimated as follows: $VOC (lb/day, lb/yr) = (Volume\ of\ coatings\ used\ (gal/day, gal/yr) \times material\ VOC\ content\ (lb-VOC/gal) + solvent\ use\ inside\ enclosure(s)\ vented\ to\ VOC\ control\ system\ (gal/day, gal/yr) \times VOC\ content\ (lb/gal)) \times (1 - overall\ capture\ and\ control\ efficiency\ (%)) + solvent\ use\ outside\ enclosure(s)\ not\ vented\ to\ VOC\ control\ system\ (gal/day, gal/yr) \times VOC\ content\ (lb/gal)$. [District Rule 2201] Federally Enforceable Through Title V Permit
9. PM10 emissions shall be estimated as follows: $PM10 (lb/day, lb/yr) = Volume\ of\ coating\ used\ (gal/day, gal/yr) \times solids\ content\ (by\ weight) \times coating\ density\ (lb/gallon) \times F \times (1 - TE) \times (1 - CE)$, where F is the fraction (%) of the solids 10 micron or less, if not available, F can be set equal to 1; TE is the coating transfer efficiency of the application equipment, for HVLV/electrostatic use 80%, and for brush, dip, or roll coating application equipment use 100%, and CE is the booth filter control efficiency for PM10. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

10. The operator shall hire a third party contractor to de-rate the curing oven using a fuel restricting orifice (or equivalent permanent devices) such that the rated heat input shall not exceed 4.9 MMBtu/hr. The permittee shall keep all records including but not limited to scope of work, date of work performed, bill of materials purchased/replaced, new heat input rate, name of the personnel performing the work and company affiliation. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit
11. Emissions from natural gas combustion in the curing oven shall not exceed any of the following limits: 0.1 lb-NO_x/MMBtu, 0.00285 lb-SO_x/MMBtu, 0.0076 lb-PM₁₀/MMBtu, 0.084 lb-CO/MMBtu, and 0.0055 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The combined VOC emissions from permit units N-1330-2, '-3, '-4, '-5, '-6 and '-7 including natural gas combustion in the RTO shall not exceed 216.7 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Emissions from natural gas combustion in the RTO shall not exceed any of the following limits: 0.036 lb-NO_x/MMBtu, 0.00285 lb-SO_x/MMBtu, 0.0076 lb-PM₁₀/MMBtu, 0.295 lb-CO/MMBtu, and 0.0055 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The VOC emission control system shall have an overall capture and control efficiency of at least 90 percent by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
15. The maximum differential pressure across the spray booth exhaust filters shall be 4 inches of water column and the minimum pressure differential across the PTE shall be 0 inches of water column. [District Rule 2201] Federally Enforceable Through Title V Permit
16. The differential pressure across the spray booth exhaust filter and the PTE shall be continuously measured using permanently installed device(s) to demonstrate on-going compliance with the overall capture and control efficiency. The measured differential readings shall be compared with the values established in this permit to detect and correct any problems with filter media, exhaust fans, enclosures or other similar apparatus in the system. [District Rule 2201] Federally Enforceable Through Title V Permit
17. The RTO shall be in operation, at or above the minimum operating chamber temperature when any coating process operates. [District Rule 2201] Federally Enforceable Through Title V Permit
18. The RTO chambers shall be permanently equipped with temperature measurement devices such as thermocouples. The combustion temperature shall be continuously monitored and recorded whenever any coating process operates. [District Rule 2201] Federally Enforceable Through Title V Permit
19. The minimum temperature in the RTO combustion chamber shall be 1,400 °F. [District Rule 2201] Federally Enforceable Through Title V Permit
20. Sampling facilities for source testing shall be provided in accordance with the provisions of Rule 1081 (Source Sampling). [District Rule 1081] Federally Enforceable Through Title V Permit
21. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
22. Source testing to determine RTO control efficiency for VOC shall be conducted at least once every 12 months. [District Rule 2201] Federally Enforceable Through Title V Permit
23. All emissions measurements shall be made with the units operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-lighting of the unit resulting from an unscheduled or unavoidable shut off of the fuel flow or electrical power to the unit. [District Rule 2201] Federally Enforceable Through Title V Permit
24. For source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

25. VOC capture efficiency shall be determined according to EPA's "Guidelines for Determining Capture Efficiency," January 9, 1995 and 40 CFR 51, Appendix M, Methods 204-204F, as applicable, or any other method approved by EPA, ARB and the District. [District Rules 2201 and 4604] Federally Enforceable Through Title V Permit
26. The RTO control efficiency shall be determined using EPA Methods 2, 2A, or 2D for measuring flow rates and EPA Methods 25, 25A, or 25B for measuring total gaseous organic concentrations at the inlet and outlet of the control device. EPA Method 18 or ARB Method 422 shall be used to determine the emissions of exempt compounds. Should the permittee decide to use a different test methodology, the methodology must first be approved by the District. [District Rules 2201 and 4604] Federally Enforceable Through Title V Permit
27. The results of each source test shall be submitted to the District within 60 days after the test. [District Rule 1081] Federally Enforceable Through Title V Permit
28. VOC content of solvents used shall not exceed 25 g/l (0.21 lb/gal) for product cleaning during manufacturing process or surface preparation for coating application, or repair and maintenance cleaning, or cleaning of coating application equipment, unless such cleaning operations are carried out within the control that meet the requirements of section 5.2 of Rule 4604 (9/20/07). [District Rule 4604] Federally Enforceable Through Title V Permit
29. VOC content of coatings as applied, excluding water and exempt compounds, used for drums and lids coating operations, shall not exceed any of the following limits, unless such coating operations are carried out within the control system that meet the requirements of section 5.2 of Rule 4604 (9/20/07) provided in the condition below: sheet base coating (interior or exterior) 225g/l (1.875 lb/gallon) using any application method, interior body spray: 420 g/l (3.5 lb/gallon) for new and 510 g/l (4.25 lb/gallon) for reconditioned using spray application method, exterior body spray: 340 g/l (2.83 lb/gallon) for new and 420 g/l (3.5 lb/gallon) for reconditioned using spray application method, overvarnish (interior or exterior) 225 g/l (1.875 lb/gallon) using any application method, interior end coating: 420 g/l (3.5 lb/gallon) for new and 510 g/l (4.25 lb/gallon) for reconditioned using spray or roll coat application method, exterior end coating: 340 g/l (2.83 lb/gallon) for new and 420 g/l (3.5 lb/gallon) for reconditioned using spray or roll coat application method, side seam coating 660 g/l (5.5 lb/gallon) using spray application method, and end seal compound 60 g/l (0.5 lb/gallon) using any application method. [District Rule 4604] Federally Enforceable Through Title V Permit
30. The use of coatings and solvents with VOC content in excess of the applicable limits (mentioned in the above condition) shall be allowed, provided that each of the following are met: 1.) The VOC emission control system shall have an overall capture and control efficiency of at least 90% on weight basis during emission producing activities, 2.) The VOC emission control system reduce VOC emissions, at all times, to a level that is not greater than the emission level which would have been achieved through the use of materials compliant with the applicable requirements of Section 5.1 and Section 5.4 of Rule 4604 (9/20/07) during emission producing activities, 3.) The operator shall monitor key system operating parameters of VOC emission control system (i.e. differential pressures established for booth and PTE to ensure proper capture, and established minimum RTO chamber temperature), 4.) The operator shall implement an Operation and Maintenance (O/M) Plan pursuant to Section 6.5 of Rule 4604 (9/20/07) with 10 days of approval of the plan, 5.) The operator shall perform source test at least once every 12 months to determine control efficiency of the control system (RTO system) using non-compliant coating and under the conditions specified in the Permit to Operate. [District Rule 4604] Federally Enforceable Through Title V Permit
31. All fresh or spent solvents, waste solvent cleaning materials such as cloth, paper etc., coatings, adhesives, catalysts, thinners and solvents shall be stored in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4604] Federally Enforceable Through Title V Permit
32. Coatings shall be applied with properly operating coating equipment. [District Rule 4604] Federally Enforceable Through Title V Permit
33. The coating application equipment shall be operated according to operating procedures specified by the equipment manufacturer. [District Rule 4604] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

34. Only electrostatic application, flow coater, roll coater, dip coater, hand application methods, HVLP spray, or any other application method that demonstrates to the District and EPA, a coating transfer efficiency of at least 65% as measured using a test method per section 6.7.4 of Rule 4604 (9/20/07) shall be used under this permit. In lieu of complying with this requirement, the operator may control emissions from application equipment with the VOC emission control system that meet the requirements of section 5.2 of Rule 4604 (9/20/07). [District Rule 4604] Federally Enforceable Through Title V Permit
35. For HVLP spray guns manufactured prior to January 1, 1996, the end user shall demonstrate that the gun meets HVLP spray equipment standards. Satisfactory proof will be either in the form of a manufacturer's published technical material or by a demonstration using a certified air pressure tip gauge, measuring the air atomizing pressure dynamically at the center of the air cap and at the air horns. [District Rule 4604] Federally Enforceable Through Title V Permit
36. The operator shall maintain and have available on site, a current list of coatings in use which provides all of the coating data necessary to evaluate compliance including the following information, as applicable: 1.) Specific manufacturer's name of coatings, catalysts and thinners used, 2.) Mix ratio of components used, and 3.) VOC content of each coating, as applied in g/l or lb/gal. [District Rule 4604] Federally Enforceable Through Title V Permit
37. The operator shall maintain daily records of the following items: 1.) Specific coating used and mix ratio of components added to the coating material prior to application, 2.) Volume of coatings applied (gallons), 3.) Specific solvents, catalysts and thinners used, and 4) Volume of each solvent, catalyst and thinner (gallons). [District Rule 4604] Federally Enforceable Through Title V Permit
38. The operator shall maintain and have available on site, a current list of cleaning solvents in use that provides all of the data necessary to evaluate compliance including the following information, as applicable: 1.) The name of the cleaning solvent and its manufacturer's name, and 2.) VOC content of the solvent expressed in g/l or lb/gal, as applied. [District Rule 4604] Federally Enforceable Through Title V Permit
39. The operator shall maintain daily records of the following items: 1.) Name of cleaning solvents used, 2.) When the solvent is a mixture of different materials that are blended by the operator, the mix ratio of the batch shall be recorded and the VOC content of the batch shall be calculated and recorded in order to determine compliance with the specified limits of VOC content. Records from before November 15, 2003 must still be retained on-site for five years from date of record, 3.) Volume of each cleaning solvent used (gallons), and 4.) The type of cleaning activity for each solvent that is being used in accordance with the applicable cleaning category specified in Section 5.4, Table 5 of Rule 4604 (9/20/07). [District Rule 4604] Federally Enforceable Through Title V Permit
40. The permittee shall keep daily records of key operating parameters, that is, differential pressures of the booth and PTE and RTO combustion chamber temperature. [District Rules 2201 and 4604] Federally Enforceable Through Title V Permit
41. The records showing violation of key operating parameters, that is, differential pressures for the booth and PTE and RTO combustion chamber temperature shall be reported to the District within 96 hours following the occurrence. Such records include an explanation of the cause of the violation and corrective action taken. [District Rule 2201 and 4604] Federally Enforceable Through Title V Permit
42. The O/M Plan shall be updated prior to any planned change in operation of the VOC emission control system. The operator may request a change to the O/M Plan at any time. If the O/M Plan undergoes significant changes to one or more O/M Plan elements, an operator must notify the District no later than 7 days after the change, and must submit an updated O/M Plan to the District for approval no later than 14 days after the change. [District Rule 4604] Federally Enforceable Through Title V Permit
43. An O/M Plan is not required for an inactive VOC emission control system until 180 days before start-up. A period of shorter than 180 days may be allowed if it can be shown that the equipment will be started up sooner than expected. [District Rule 4604] Federally Enforceable Through Title V Permit
44. The operator shall retain all records for a minimum of five years, make the records available on site during normal business hours to the APCO, ARB, or EPA, and submit the records to the APCO, ARB, or EPA upon request. [District Rules 2201 and 4604] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1330-3-3

EXPIRATION DATE: 09/30/2017

EQUIPMENT DESCRIPTION:

CAN AND COIL COATING OPERATION #2 : BINKS EXTERIOR BODY BOOTH IN A PERMANENT TOTAL ENCLOSURE (PTE); AND A 3.9 MMBTU/HR DIRECT-FIRED NATURAL GAS BLUE SURF PAINT CURING OVEN SHARED BY PERMITS N-1330-3 AND '-6. THE BOOTH ENCLOSURE AND THE CURING OVEN ARE VENTED TO A COMMON 4.6 MMBTU/HR NATURAL GAS-FIRED REGENERATIVE THERMAL OXIDIZER (RTO) SHARED AMONG PERMITS N-1330-2, '-3, '-4, '-5, '-6 AND '-7

PERMIT UNIT REQUIREMENTS

1. VOC emissions from the entire stationary source shall not exceed 19,999 pounds in any 12 consecutive month rolling period. The permittee shall maintain monthly records of VOC emissions to demonstrate compliance with this condition. [District Rule 2201] Federally Enforceable Through Title V Permit
2. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
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. Exhaust fans shall be switched on prior to the start of paint spraying operations. [District Rule 2201] Federally Enforceable Through Title V Permit
6. All filters shall be properly maintained and must be in place during the painting operation. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Emissions from the coating operation (paint and solvent use) shall not exceed any of following limits: 63.1 lb-VOC/day and 11.1 lb-PM10/day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. VOC emissions shall be estimated as follows: $VOC (lb/day, lb/yr) = (Volume\ of\ coatings\ used\ (gal/day, gal/yr) \times material\ VOC\ content\ (lb-VOC/gal) + solvent\ use\ inside\ enclosure(s)\ vented\ to\ VOC\ control\ system\ (gal/day, gal/yr) \times VOC\ content\ (lb/gal)) \times (1 - overall\ capture\ and\ control\ efficiency\ (\%)) + solvent\ use\ outside\ enclosure(s)\ not\ vented\ to\ VOC\ control\ system\ (gal/day, gal/yr) \times VOC\ content\ (lb/gal)$. [District Rule 2201] Federally Enforceable Through Title V Permit
9. PM10 emissions shall be estimated as follows: $PM10 (lb/day, lb/yr) = Volume\ of\ coating\ used\ (gal/day, gal/yr) \times solids\ content\ (by\ weight) \times coating\ density\ (lb/gallon) \times F \times (1 - TE) \times (1 - CE)$, where F is the fraction (%) of the solids 10 micron or less, if not available, F can be set equal to 1; TE is the coating transfer efficiency of the application equipment, for HVLP/electrostatic use 80%, and for brush, dip, or roll coating application equipment use 100%, and CE is the booth filter control efficiency for PM10. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Emissions from natural gas combustion in the curing oven shall not exceed any of the following limits: 0.1 lb-NOx/MMBtu, 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 0.084 lb-CO/MMBtu, and 0.0055 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

11. The combined VOC emissions from permit units N-1330-2, '-3, '-4, '-5, '-6 and '-7 including natural gas combustion in the RTO shall not exceed 216.7 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Emissions from natural gas combustion in the RTO shall not exceed any of the following limits: 0.036 lb-NO_x/MMBtu, 0.00285 lb-SO_x/MMBtu, 0.0076 lb-PM₁₀/MMBtu, 0.295 lb-CO/MMBtu, and 0.0055 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The VOC emission control system shall have an overall capture and control efficiency of at least 90 percent by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The maximum differential pressure across the spray booth exhaust filters shall be 4 inches of water column and the minimum pressure differential across the PTE shall be 0 inches of water column. [District Rule 2201] Federally Enforceable Through Title V Permit
15. The differential pressure across the spray booth exhaust filter and the PTE shall be continuously measured using permanently installed device(s) to demonstrate on-going compliance with the overall capture and control efficiency. The measured differential readings shall be compared with the values established in this permit to detect and correct any problems with filter media, exhaust fans, enclosures or other similar apparatus in the system. [District Rule 2201] Federally Enforceable Through Title V Permit
16. The RTO shall be in operation, at or above the minimum operating chamber temperature being established during the initial source test, when any coating process operates. [District Rule 2201] Federally Enforceable Through Title V Permit
17. The RTO chambers shall be permanently equipped with temperature measurement devices such as thermocouples. The combustion temperature shall be continuously monitored and recorded whenever any coating process operates. [District Rule 2201] Federally Enforceable Through Title V Permit
18. The minimum temperature in the RTO combustion chamber shall be 1,400 °F. [District Rule 2201] Federally Enforceable Through Title V Permit
19. Sampling facilities for source testing shall be provided in accordance with the provisions of Rule 1081 (Source Sampling). [District Rule 1081] Federally Enforceable Through Title V Permit
20. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
21. Source testing to determine RTO control efficiency for VOC shall be conducted at least once every 12 months. [District Rule 2201] Federally Enforceable Through Title V Permit
22. All emissions measurements shall be made with the units operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-lighting of the unit resulting from an unscheduled or unavoidable shut off of the fuel flow or electrical power to the unit. [District Rule 2201] Federally Enforceable Through Title V Permit
23. For source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rule 2201] Federally Enforceable Through Title V Permit
24. VOC capture efficiency shall be determined according to EPA's "Guidelines for Determining Capture Efficiency," January 9, 1995 and 40 CFR 51, Appendix M, Methods 204-204F, as applicable, or any other method approved by EPA, ARB and the District. [District Rules 2201 and 4604] Federally Enforceable Through Title V Permit
25. The RTO control efficiency shall be determined using EPA Methods 2, 2A, or 2D for measuring flow rates and EPA Methods 25, 25A, or 25B for measuring total gaseous organic concentrations at the inlet and outlet of the control device. EPA Method 18 or ARB Method 422 shall be used to determine the emissions of exempt compounds. Should the permittee decide to use a different test methodology, the methodology must first be approved by the District. [District Rules 2201 and 4604] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

26. The results of each source test shall be submitted to the District within 60 days after the test. [District Rule 1081] Federally Enforceable Through Title V Permit
27. VOC content of solvents used shall not exceed 25 g/l (0.21 lb/gal) for product cleaning during manufacturing process or surface preparation for coating application, or repair and maintenance cleaning, or cleaning of coating application equipment, unless such cleaning operations are carried out within the control that meet the requirements of section 5.2 of Rule 4604 (9/20/07). [District Rule 4604] Federally Enforceable Through Title V Permit
28. VOC content of coatings as applied, excluding water and exempt compounds, used for drums and lids coating operations, shall not exceed any of the following limits, unless such coating operations are carried out within the control system that meet the requirements of section 5.2 of Rule 4604 (9/20/07) provided in the condition below: sheet base coating (interior or exterior) 225g/l (1.875 lb/gallon) using any application method, interior body spray: 420 g/l (3.5 lb/gallon) for new and 510 g/l (4.25 lb/gallon) for reconditioned using spray application method, exterior body spray: 340 g/l (2.83 lb/gallon) for new and 420 g/l (3.5 lb/gallon) for reconditioned using spray application method, overvarnish (interior or exterior) 225 g/l (1.875 lb/gallon) using any application method, interior end coating: 420 g/l (3.5 lb/gallon) for new and 510 g/l (4.25 lb/gallon) for reconditioned using spray or roll coat application method, exterior end coating: 340 g/l (2.83 lb/gallon) for new and 420 g/l (3.5 lb/gallon) for reconditioned using spray or roll coat application method, side seam coating 660 g/l (5.5 lb/gallon) using spray application method, and end seal compound 60 g/l (0.5 lb/gallon) using any application method. [District Rule 4604] Federally Enforceable Through Title V Permit
29. The use of coatings and solvents with VOC content in excess of the applicable limits (mentioned in the above condition) shall be allowed, provided that each of the following are met: 1.) The VOC emission control system shall have an overall capture and control efficiency of at least 90% on weight basis during emission producing activities, 2.) The VOC emission control system reduce VOC emissions, at all times, to a level that is not greater than the emission level which would have been achieved through the use of materials compliant with the applicable requirements of Section 5.1 and Section 5.4 of Rule 4604 (9/20/07) during emission producing activities, 3.) The operator shall monitor key system operating parameters of VOC emission control system (i.e. differential pressures established for booth and PTE to ensure proper capture, and established minimum RTO chamber temperature), 4.) The operator shall implement an Operation and Maintenance (O/M) Plan pursuant to Section 6.5 of Rule 4604 (9/20/07) with 10 days of approval of the plan, 5.) The operator shall perform source test at least once every 12 months to determine control efficiency of the control system (RTO system) using non-compliant coating and under the conditions specified in the Permit to Operate. [District Rule 4604] Federally Enforceable Through Title V Permit
30. All fresh or spent solvents, waste solvent cleaning materials such as cloth, paper etc., coatings, adhesives, catalysts, thinners and solvents shall be stored in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4604] Federally Enforceable Through Title V Permit
31. Coatings shall be applied with properly operating coating equipment. [District Rule 4604] Federally Enforceable Through Title V Permit
32. The coating application equipment shall be operated according to operating procedures specified by the equipment manufacturer. [District Rule 4604] Federally Enforceable Through Title V Permit
33. Only electrostatic application, flow coater, roll coater, dip coater, hand application methods, HVLP spray, or any other application method that demonstrates to the District and EPA, a coating transfer efficiency of at least 65% as measured using a test method per section 6.7.4 of Rule 4604 (9/20/07) shall be used under this permit. In lieu of complying with this requirement, the operator may control emissions from application equipment with the VOC emission control system that meet the requirements of section 5.2 of Rule 4604 (9/20/07). [District Rule 4604] Federally Enforceable Through Title V Permit
34. For HVLP spray guns manufactured prior to January 1, 1996, the end user shall demonstrate that the gun meets HVLP spray equipment standards. Satisfactory proof will be either in the form of a manufacturer's published technical material or by a demonstration using a certified air pressure tip gauge, measuring the air atomizing pressure dynamically at the center of the air cap and at the air horns. [District Rule 4604] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

35. The operator shall maintain and have available on site, a current list of coatings in use which provides all of the coating data necessary to evaluate compliance including the following information, as applicable: 1.) Specific manufacturer's name of coatings, catalysts and thinners used, 2.) Mix ratio of components used, and 3.) VOC content of each coating, as applied in g/l or lb/gal. [District Rule 4604] Federally Enforceable Through Title V Permit
36. The operator shall maintain daily records of the following items: 1.) Specific coating used and mix ratio of components added to the coating material prior to application, 2.) Volume of coatings applied (gallons), 3.) Specific solvents, catalysts and thinners used, and 4) Volume of each solvent, catalyst and thinner (gallons). [District Rule 4604] Federally Enforceable Through Title V Permit
37. The operator shall maintain and have available on site, a current list of cleaning solvents in use that provides all of the data necessary to evaluate compliance including the following information, as applicable: 1.) The name of the cleaning solvent and its manufacturer's name, and 2.) VOC content of the solvent expressed in g/l or lb/gal, as applied. [District Rule 4604] Federally Enforceable Through Title V Permit
38. The operator shall maintain daily records of the following items: 1.) Name of cleaning solvents used, 2.) When the solvent is a mixture of different materials that are blended by the operator, the mix ratio of the batch shall be recorded and the VOC content of the batch shall be calculated and recorded in order to determine compliance with the specified limits of VOC content. Records from before November 15, 2003 must still be retained on-site for five years from date of record, 3.) Volume of each cleaning solvent used (gallons), and 4.) The type of cleaning activity for each solvent that is being used in accordance with the applicable cleaning category specified in Section 5.4, Table 5 of Rule 4604 (9/20/07). [District Rule 4604] Federally Enforceable Through Title V Permit
39. The permittee shall keep daily records of key operating parameters, that is, differential pressures of the booth and PTE and RTO combustion chamber temperature. [District Rules 2201 and 4604] Federally Enforceable Through Title V Permit
40. The records showing violation of key operating parameters, that is, differential pressures for the booth and PTE and RTO combustion chamber temperature shall be reported to the District within 96 hours following the occurrence. Such records include an explanation of the cause of the violation and corrective action taken. [District Rule 2201 and 4604] Federally Enforceable Through Title V Permit
41. The O/M Plan shall be updated prior to any planned change in operation of the VOC emission control system. The operator may request a change to the O/M Plan at any time. If the O/M Plan undergoes significant changes to one or more O/M Plan elements, an operator must notify the District no later than 7 days after the change, and must submit an updated O/M Plan to the District for approval no later than 14 days after the change. [District Rule 4604] Federally Enforceable Through Title V Permit
42. An O/M Plan is not required for an inactive VOC emission control system until 180 days before start-up. A period of shorter than 180 days may be allowed if it can be shown that the equipment will be started up sooner than expected. [District Rule 4604] Federally Enforceable Through Title V Permit
43. The operator shall retain all records for a minimum of five years, make the records available on site during normal business hours to the APCO, ARB, or EPA, and submit the records to the APCO, ARB, or EPA upon request. [District Rules 2201 and 4604] Federally Enforceable Through Title V Permit

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

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1330-4-3

EXPIRATION DATE: 09/30/2017

EQUIPMENT DESCRIPTION:

CAN AND COIL COATING OPERATION #3: CENTRIFUGAL COATER (#2) AND RHEEM DESIGN BOOTH IN A PERMANENT TOTAL ENCLOSURE (PTE); AND A 4.9 MMBTU/HR (DE-RATED) SHELL PAINT CURING OVEN SHARED BY PERMITS N-1330-4 AND 5. THE BOOTH ENCLOSURE AND THE CURING OVEN ARE VENTED TO A 4.6 MMBTU/HR NATURAL GAS-FIRED REGENERATIVE THERMAL OXIDIZER (RTO) SHARED AMONG PERMITS N-1330-2, '-3, '-4, '-5, '-6 AND '-7

PERMIT UNIT REQUIREMENTS

1. VOC emissions from the entire stationary source shall not exceed 19,999 pounds in any 12 consecutive month rolling period. The permittee shall maintain monthly records of VOC emissions to demonstrate compliance with this condition. [District Rule 2201] Federally Enforceable Through Title V Permit
2. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
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. Exhaust fans shall be switched on prior to the start of paint spraying operations. [District Rule 2201] Federally Enforceable Through Title V Permit
6. All filters shall be properly maintained and must be in place during the painting operation. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Emissions from the coating operation (paint and solvent use) shall not exceed any of following limits: 18.7 lb-VOC/day and 1.6 lb-PM10/day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. VOC emissions shall be estimated as follows: $VOC (lb/day, lb/yr) = (Volume\ of\ coatings\ used\ (gal/day, gal/yr) \times material\ VOC\ content\ (lb-VOC/gal) + solvent\ use\ inside\ enclosure(s)\ vented\ to\ VOC\ control\ system\ (gal/day, gal/yr) \times VOC\ content\ (lb/gal)) \times (1 - overall\ capture\ and\ control\ efficiency\ (%)) + solvent\ use\ outside\ enclosure(s)\ not\ vented\ to\ VOC\ control\ system\ (gal/day, gal/yr) \times VOC\ content\ (lb/gal)$. [District Rule 2201] Federally Enforceable Through Title V Permit
9. PM10 emissions shall be estimated as follows: $PM10 (lb/day, lb/yr) = Volume\ of\ coating\ used\ (gal/day, gal/yr) \times solids\ content\ (by\ weight) \times coating\ density\ (lb/gallon) \times F \times (1 - TE) \times (1 - CE)$, where F is the fraction (%) of the solids 10 micron or less, if not available, F can be set equal to 1; TE is the coating transfer efficiency of the application equipment, for HVLP/electrostatic use 80%, and for brush, dip, or roll coating application equipment use 100%, and CE is the booth filter control efficiency for PM10. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The operator shall hire a third party contractor to de-rate the curing oven using a fuel restricting orifice (or equivalent permanent devices) such that the rated heat input shall not exceed 4.9 MMBtu/hr. The permittee shall keep all records including but not limited to scope of work, date of work performed, bill of materials purchased/replaced, new heat input rate, name of the personnel performing the work and company affiliation. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

11. Emissions from natural gas combustion in the curing oven shall not exceed any of the following limits: 0.1 lb-NO_x/MMBtu, 0.00285 lb-SO_x/MMBtu, 0.0076 lb-PM₁₀/MMBtu, 0.084 lb-CO/MMBtu, and 0.0055 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The combined VOC emissions from permit units N-1330-2, '-3, '-4, '-5, '-6 and '-7 including natural gas combustion in the RTO shall not exceed 216.7 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Emissions from natural gas combustion in the RTO shall not exceed any of the following limits: 0.036 lb-NO_x/MMBtu, 0.00285 lb-SO_x/MMBtu, 0.0076 lb-PM₁₀/MMBtu, 0.295 lb-CO/MMBtu, and 0.0055 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The VOC emission control system shall have an overall capture and control efficiency of at least 90 percent by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
15. The maximum differential pressure across the spray booth exhaust filters shall be 4 inches of water column and the minimum pressure differential across the PTE shall be 0 inches of water column. [District Rule 2201] Federally Enforceable Through Title V Permit
16. The differential pressure across the spray booth exhaust filter and the PTE shall be continuously measured using permanently installed device(s) to demonstrate on-going compliance with the overall capture and control efficiency. The measured differential readings shall be compared with the values established in this permit to detect and correct any problems with filter media, exhaust fans, enclosures or other similar apparatus in the system. [District Rule 2201] Federally Enforceable Through Title V Permit
17. The RTO shall be in operation, at or above the minimum operating chamber temperature being established during the initial source test, when any coating process operates. [District Rule 2201] Federally Enforceable Through Title V Permit
18. The RTO chambers shall be permanently equipped with temperature measurement devices such as thermocouples. The combustion temperature shall be continuously monitored and recorded whenever any coating process operates. [District Rule 2201] Federally Enforceable Through Title V Permit
19. The minimum temperature in the RTO combustion chamber shall be 1,400 °F. [District Rule 2201] Federally Enforceable Through Title V Permit
20. Sampling facilities for source testing shall be provided in accordance with the provisions of Rule 1081 (Source Sampling). [District Rule 1081] Federally Enforceable Through Title V Permit
21. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
22. Source testing to determine RTO control efficiency for VOC shall be conducted at least once every 12 months. [District Rule 2201] Federally Enforceable Through Title V Permit
23. All emissions measurements shall be made with the units operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-lighting of the unit resulting from an unscheduled or unavoidable shut off of the fuel flow or electrical power to the unit. [District Rule 2201] Federally Enforceable Through Title V Permit
24. For source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rule 2201] Federally Enforceable Through Title V Permit
25. VOC capture efficiency shall be determined according to EPA's "Guidelines for Determining Capture Efficiency," January 9, 1995 and 40 CFR 51, Appendix M, Methods 204-204F, as applicable, or any other method approved by EPA, ARB and the District. [District Rules 2201 and 4604] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

26. The RTO control efficiency shall be determined using EPA Methods 2, 2A, or 2D for measuring flow rates and EPA Methods 25, 25A, or 25B for measuring total gaseous organic concentrations at the inlet and outlet of the control device. EPA Method 18 or ARB Method 422 shall be used to determine the emissions of exempt compounds. Should the permittee decide to use a different test methodology, the methodology must first be approved by the District. [District Rules 2201 and 4604] Federally Enforceable Through Title V Permit
27. The results of each source test shall be submitted to the District within 60 days after the test. [District Rule 1081] Federally Enforceable Through Title V Permit
28. VOC content of solvents used shall not exceed 25 g/l (0.21 lb/gal) for product cleaning during manufacturing process or surface preparation for coating application, or repair and maintenance cleaning, or cleaning of coating application equipment, unless such cleaning operations are carried out within the control that meet the requirements of section 5.2 of Rule 4604 (9/20/07). [District Rule 4604] Federally Enforceable Through Title V Permit
29. VOC content of coatings as applied, excluding water and exempt compounds, used for drums and lids coating operations, shall not exceed any of the following limits, unless such coating operations are carried out within the control system that meet the requirements of section 5.2 of Rule 4604 (9/20/07) provided in the condition below: sheet base coating (interior or exterior) 225g/l (1.875 lb/gallon) using any application method, interior body spray: 420 g/l (3.5 lb/gallon) for new and 510 g/l (4.25 lb/gallon) for reconditioned using spray application method, exterior body spray: 340 g/l (2.83 lb/gallon) for new and 420 g/l (3.5 lb/gallon) for reconditioned using spray application method, overvarnish (interior or exterior) 225 g/l (1.875 lb/gallon) using any application method, interior end coating: 420 g/l (3.5 lb/gallon) for new and 510 g/l (4.25 lb/gallon) for reconditioned using spray or roll coat application method, exterior end coating: 340 g/l (2.83 lb/gallon) for new and 420 g/l (3.5 lb/gallon) for reconditioned using spray or roll coat application method, side seam coating 660 g/l (5.5 lb/gallon) using spray application method, and end seal compound 60 g/l (0.5 lb/gallon) using any application method. [District Rule 4604] Federally Enforceable Through Title V Permit
30. The use of coatings and solvents with VOC content in excess of the applicable limits (mentioned in the above condition) shall be allowed, provided that each of the following are met: 1.) The VOC emission control system shall have an overall capture and control efficiency of at least 90% on weight basis during emission producing activities, 2.) The VOC emission control system reduce VOC emissions, at all times, to a level that is not greater than the emission level which would have been achieved through the use of materials compliant with the applicable requirements of Section 5.1 and Section 5.4 of Rule 4604 (9/20/07) during emission producing activities, 3.) The operator shall monitor key system operating parameters of VOC emission control system (i.e. differential pressures established for booth and PTE to ensure proper capture, and established minimum RTO chamber temperature), 4.) The operator shall implement an Operation and Maintenance (O/M) Plan pursuant to Section 6.5 of Rule 4604 (9/20/07) with 10 days of approval of the plan, 5.) The operator shall perform source test at least once every 12 months to determine control efficiency of the control system (RTO system) using non-compliant coating and under the conditions specified in the Permit to Operate. [District Rule 4604] Federally Enforceable Through Title V Permit
31. All fresh or spent solvents, waste solvent cleaning materials such as cloth, paper etc., coatings, adhesives, catalysts, thinners and solvents shall be stored in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4604] Federally Enforceable Through Title V Permit
32. Coatings shall be applied with properly operating coating equipment. [District Rule 4604] Federally Enforceable Through Title V Permit
33. The coating application equipment shall be operated according to operating procedures specified by the equipment manufacturer. [District Rule 4604] Federally Enforceable Through Title V Permit
34. Only electrostatic application, flow coater, roll coater, dip coater, hand application methods, HVLP spray, or any other application method that demonstrates to the District and EPA, a coating transfer efficiency of at least 65% as measured using a test method per section 6.7.4 of Rule 4604 (9/20/07) shall be used under this permit. In lieu of complying with this requirement, the operator may control emissions from application equipment with the VOC emission control system that meet the requirements of section 5.2 of Rule 4604 (9/20/07). [District Rule 4604] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

35. For HVLP spray guns manufactured prior to January 1, 1996, the end user shall demonstrate that the gun meets HVLP spray equipment standards. Satisfactory proof will be either in the form of a manufacturer's published technical material or by a demonstration using a certified air pressure tip gauge, measuring the air atomizing pressure dynamically at the center of the air cap and at the air horns. [District Rule 4604] Federally Enforceable Through Title V Permit
36. The operator shall maintain and have available on site, a current list of coatings in use which provides all of the coating data necessary to evaluate compliance including the following information, as applicable: 1.) Specific manufacturer's name of coatings, catalysts and thinners used, 2.) Mix ratio of components used, and 3.) VOC content of each coating, as applied in g/l or lb/gal. [District Rule 4604] Federally Enforceable Through Title V Permit
37. The operator shall maintain daily records of the following items: 1.) Specific coating used and mix ratio of components added to the coating material prior to application, 2.) Volume of coatings applied (gallons), 3.) Specific solvents, catalysts and thinners used, and 4) Volume of each solvent, catalyst and thinner (gallons). [District Rule 4604] Federally Enforceable Through Title V Permit
38. The operator shall maintain and have available on site, a current list of cleaning solvents in use that provides all of the data necessary to evaluate compliance including the following information, as applicable: 1.) The name of the cleaning solvent and its manufacturer's name, and 2.) VOC content of the solvent expressed in g/l or lb/gal, as applied. [District Rule 4604] Federally Enforceable Through Title V Permit
39. The operator shall maintain daily records of the following items: 1.) Name of cleaning solvents used, 2.) When the solvent is a mixture of different materials that are blended by the operator, the mix ratio of the batch shall be recorded and the VOC content of the batch shall be calculated and recorded in order to determine compliance with the specified limits of VOC content. Records from before November 15, 2003 must still be retained on-site for five years from date of record, 3.) Volume of each cleaning solvent used (gallons), and 4.) The type of cleaning activity for each solvent that is being used in accordance with the applicable cleaning category specified in Section 5.4, Table 5 of Rule 4604 (9/20/07). [District Rule 4604] Federally Enforceable Through Title V Permit
40. The permittee shall keep daily records of key operating parameters, that is, differential pressures of the booth and PTE and RTO combustion chamber temperature. [District Rules 2201 and 4604] Federally Enforceable Through Title V Permit
41. The records showing violation of key operating parameters, that is, differential pressures for the booth and PTE and RTO combustion chamber temperature shall be reported to the District within 96 hours following the occurrence. Such records include an explanation of the cause of the violation and corrective action taken. [District Rule 2201 and 4604] Federally Enforceable Through Title V Permit
42. The O/M Plan shall be updated prior to any planned change in operation of the VOC emission control system. The operator may request a change to the O/M Plan at any time. If the O/M Plan undergoes significant changes to one or more O/M Plan elements, an operator must notify the District no later than 7 days after the change, and must submit an updated O/M Plan to the District for approval no later than 14 days after the change. [District Rule 4604] Federally Enforceable Through Title V Permit
43. An O/M Plan is not required for an inactive VOC emission control system until 180 days before start-up. A period of shorter than 180 days may be allowed if it can be shown that the equipment will be started up sooner than expected. [District Rule 4604] Federally Enforceable Through Title V Permit
44. The operator shall retain all records for a minimum of five years, make the records available on site during normal business hours to the APCO, ARB, or EPA, and submit the records to the APCO, ARB, or EPA upon request. [District Rules 2201 and 4604] Federally Enforceable Through Title V Permit

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

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1330-5-3

EXPIRATION DATE: 09/30/2017

EQUIPMENT DESCRIPTION:

CAN AND COIL COATING OPERATION #4: CENTRIFUGAL COATER (#1) IN A PERMANENT TOTAL ENCLOSURE (PTE); AND A 4.9 MMBTU/HR (DE-RATED) SHELL PAINT CURING OVEN SHARED BY PERMITS N-1330-4 AND 5. THE BOOTH ENCLOSURE AND THE CURING OVEN ARE VENTED TO A 4.6 MMBTU/HR NATURAL GAS-FIRED REGENERATIVE THERMAL OXIDIZER (RTO) SHARED AMONG PERMITS N-1330-2, '-3, '-4, '-5, '-6 AND '-7

PERMIT UNIT REQUIREMENTS

1. VOC emissions from the entire stationary source shall not exceed 19,999 pounds in any 12 consecutive month rolling period. The permittee shall maintain monthly records of VOC emissions to demonstrate compliance with this condition. [District Rule 2201] Federally Enforceable Through Title V Permit
2. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
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. Exhaust fans shall be switched on prior to the start of paint spraying operations. [District Rule 2201] Federally Enforceable Through Title V Permit
6. All filters shall be properly maintained and must be in place during the painting operation. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Emissions from the coating operation (paint and solvent use) shall not exceed any of following limits: 18.7 lb-VOC/day and 1.6 lb-PM10/day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. VOC emissions shall be estimated as follows: $VOC (lb/day, lb/yr) = (Volume\ of\ coatings\ used\ (gal/day, gal/yr) \times material\ VOC\ content\ (lb-VOC/gal) + solvent\ use\ inside\ enclosure(s)\ vented\ to\ VOC\ control\ system\ (gal/day, gal/yr) \times VOC\ content\ (lb/gal)) \times (1 - overall\ capture\ and\ control\ efficiency\ (\%)) + solvent\ use\ outside\ enclosure(s)\ not\ vented\ to\ VOC\ control\ system\ (gal/day, gal/yr) \times VOC\ content\ (lb/gal)$. [District Rule 2201] Federally Enforceable Through Title V Permit
9. PM10 emissions shall be estimated as follows: $PM10 (lb/day, lb/yr) = Volume\ of\ coating\ used\ (gal/day, gal/yr) \times solids\ content\ (by\ weight) \times coating\ density\ (lb/gallon) \times F \times (1 - TE) \times (1 - CE)$, where F is the fraction (%) of the solids 10 micron or less, if not available, F can be set equal to 1; TE is the coating transfer efficiency of the application equipment, for HVLPE/electrostatic use 80%, and for brush, dip, or roll coating application equipment use 100%, and CE is the booth filter control efficiency for PM10. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The operator shall hire a third party contractor to de-rate the curing oven using a fuel restricting orifice (or equivalent permanent devices) such that the rated heat input shall not exceed 4.9 MMBtu/hr. The permittee shall keep all records including but not limited to scope of work, date of work performed, bill of materials purchased/replaced, new heat input rate, name of the personnel performing the work and company affiliation. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

11. Emissions from natural gas combustion in the curing oven shall not exceed any of the following limits: 0.1 lb-NO_x/MMBtu, 0.00285 lb-SO_x/MMBtu, 0.0076 lb-PM₁₀/MMBtu, 0.084 lb-CO/MMBtu, and 0.0055 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The combined VOC emissions from permit units N-1330-2, '-3, '-4, '-5, '-6 and '-7 including natural gas combustion in the RTO shall not exceed 216.7 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Emissions from natural gas combustion in the RTO shall not exceed any of the following limits: 0.036 lb-NO_x/MMBtu, 0.00285 lb-SO_x/MMBtu, 0.0076 lb-PM₁₀/MMBtu, 0.295 lb-CO/MMBtu, and 0.0055 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The VOC emission control system shall have an overall capture and control efficiency of at least 90 percent by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
15. The maximum differential pressure across the spray booth exhaust filters shall be 4 inches of water column and the minimum pressure differential across the PTE shall be 0 inches of water column. [District Rule 2201] Federally Enforceable Through Title V Permit
16. The differential pressure across the spray booth exhaust filter and the PTE shall be continuously measured using permanently installed device(s) to demonstrate on-going compliance with the overall capture and control efficiency. The measured differential readings shall be compared with the values established in this permit to detect and correct any problems with filter media, exhaust fans, enclosures or other similar apparatus in the system. [District Rule 2201] Federally Enforceable Through Title V Permit
17. The RTO shall be in operation, at or above the minimum operating chamber temperature being established during the initial source test, when any coating process operates. [District Rule 2201] Federally Enforceable Through Title V Permit
18. The RTO chambers shall be permanently equipped with temperature measurement devices such as thermocouples. The combustion temperature shall be continuously monitored and recorded whenever any coating process operates. [District Rule 2201] Federally Enforceable Through Title V Permit
19. The minimum temperature in the RTO combustion chamber shall be 1,400 °F. [District Rule 2201] Federally Enforceable Through Title V Permit
20. Sampling facilities for source testing shall be provided in accordance with the provisions of Rule 1081 (Source Sampling). [District Rule 1081] Federally Enforceable Through Title V Permit
21. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
22. Source testing to determine RTO control efficiency for VOC shall be conducted at least once every 12 months. [District Rule 2201] Federally Enforceable Through Title V Permit
23. All emissions measurements shall be made with the units operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-lighting of the unit resulting from an unscheduled or unavoidable shut off of the fuel flow or electrical power to the unit. [District Rule 2201] Federally Enforceable Through Title V Permit
24. For source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rule 2201] Federally Enforceable Through Title V Permit
25. VOC capture efficiency shall be determined according to EPA's "Guidelines for Determining Capture Efficiency," January 9, 1995 and 40 CFR 51, Appendix M, Methods 204-204F, as applicable, or any other method approved by EPA, ARB and the District. [District Rules 2201 and 4604] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

26. The RTO control efficiency shall be determined using EPA Methods 2, 2A, or 2D for measuring flow rates and EPA Methods 25, 25A, or 25B for measuring total gaseous organic concentrations at the inlet and outlet of the control device. EPA Method 18 or ARB Method 422 shall be used to determine the emissions of exempt compounds. Should the permittee decide to use a different test methodology, the methodology must first be approved by the District. [District Rules 2201 and 4604] Federally Enforceable Through Title V Permit
27. The results of each source test shall be submitted to the District within 60 days after the test. [District Rule 1081] Federally Enforceable Through Title V Permit
28. VOC content of solvents used shall not exceed 25 g/l (0.21 lb/gal) for product cleaning during manufacturing process or surface preparation for coating application, or repair and maintenance cleaning, or cleaning of coating application equipment, unless such cleaning operations are carried out within the control that meet the requirements of section 5.2 of Rule 4604 (9/20/07). [District Rule 4604] Federally Enforceable Through Title V Permit
29. VOC content of coatings as applied, excluding water and exempt compounds, used for drums and lids coating operations, shall not exceed any of the following limits, unless such coating operations are carried out within the control system that meet the requirements of section 5.2 of Rule 4604 (9/20/07) provided in the condition below: sheet base coating (interior or exterior) 225g/l (1.875 lb/gallon) using any application method, interior body spray: 420 g/l (3.5 lb/gallon) for new and 510 g/l (4.25 lb/gallon) for reconditioned using spray application method, exterior body spray: 340 g/l (2.83 lb/gallon) for new and 420 g/l (3.5 lb/gallon) for reconditioned using spray application method, overvarnish (interior or exterior) 225 g/l (1.875 lb/gallon) using any application method, interior end coating: 420 g/l (3.5 lb/gallon) for new and 510 g/l (4.25 lb/gallon) for reconditioned using spray or roll coat application method, exterior end coating: 340 g/l (2.83 lb/gallon) for new and 420 g/l (3.5 lb/gallon) for reconditioned using spray or roll coat application method, side seam coating 660 g/l (5.5 lb/gallon) using spray application method, and end seal compound 60 g/l (0.5 lb/gallon) using any application method. [District Rule 4604] Federally Enforceable Through Title V Permit
30. The use of coatings and solvents with VOC content in excess of the applicable limits (mentioned in the above condition) shall be allowed, provided that each of the following are met: 1.) The VOC emission control system shall have an overall capture and control efficiency of at least 90% on weight basis during emission producing activities, 2.) The VOC emission control system reduce VOC emissions, at all times, to a level that is not greater than the emission level which would have been achieved through the use of materials compliant with the applicable requirements of Section 5.1 and Section 5.4 of Rule 4604 (9/20/07) during emission producing activities, 3.) The operator shall monitor key system operating parameters of VOC emission control system (i.e. differential pressures established for booth and PTE to ensure proper capture, and established minimum RTO chamber temperature), 4.) The operator shall implement an Operation and Maintenance (O/M) Plan pursuant to Section 6.5 of Rule 4604 (9/20/07) with 10 days of approval of the plan, 5.) The operator shall perform source test at least once every 12 months to determine control efficiency of the control system (RTO system) using non-compliant coating and under the conditions specified in the Permit to Operate. [District Rule 4604] Federally Enforceable Through Title V Permit
31. All fresh or spent solvents, waste solvent cleaning materials such as cloth, paper etc., coatings, adhesives, catalysts, thinners and solvents shall be stored in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4604] Federally Enforceable Through Title V Permit
32. Coatings shall be applied with properly operating coating equipment. [District Rule 4604] Federally Enforceable Through Title V Permit
33. The coating application equipment shall be operated according to operating procedures specified by the equipment manufacturer. [District Rule 4604] Federally Enforceable Through Title V Permit
34. Only electrostatic application, flow coater, roll coater, dip coater, hand application methods, HVLP spray, or any other application method that demonstrates to the District and EPA, a coating transfer efficiency of at least 65% as measured using a test method per section 6.7.4 of Rule 4604 (9/20/07) shall be used under this permit. In lieu of complying with this requirement, the operator may control emissions from application equipment with the VOC emission control system that meet the requirements of section 5.2 of Rule 4604 (9/20/07). [District Rule 4604] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

35. For HVLP spray guns manufactured prior to January 1, 1996, the end user shall demonstrate that the gun meets HVLP spray equipment standards. Satisfactory proof will be either in the form of a manufacturer's published technical material or by a demonstration using a certified air pressure tip gauge, measuring the air atomizing pressure dynamically at the center of the air cap and at the air horns. [District Rule 4604] Federally Enforceable Through Title V Permit
36. The operator shall maintain and have available on site, a current list of coatings in use which provides all of the coating data necessary to evaluate compliance including the following information, as applicable: 1.) Specific manufacturer's name of coatings, catalysts and thinners used, 2.) Mix ratio of components used, and 3.) VOC content of each coating, as applied in g/l or lb/gal. [District Rule 4604] Federally Enforceable Through Title V Permit
37. The operator shall maintain daily records of the following items: 1.) Specific coating used and mix ratio of components added to the coating material prior to application, 2.) Volume of coatings applied (gallons), 3.) Specific solvents, catalysts and thinners used, and 4) Volume of each solvent, catalyst and thinner (gallons). [District Rule 4604] Federally Enforceable Through Title V Permit
38. The operator shall maintain and have available on site, a current list of cleaning solvents in use that provides all of the data necessary to evaluate compliance including the following information, as applicable: 1.) The name of the cleaning solvent and its manufacturer's name, and 2.) VOC content of the solvent expressed in g/l or lb/gal, as applied. [District Rule 4604] Federally Enforceable Through Title V Permit
39. The operator shall maintain daily records of the following items: 1.) Name of cleaning solvents used, 2.) When the solvent is a mixture of different materials that are blended by the operator, the mix ratio of the batch shall be recorded and the VOC content of the batch shall be calculated and recorded in order to determine compliance with the specified limits of VOC content. Records from before November 15, 2003 must still be retained on-site for five years from date of record, 3.) Volume of each cleaning solvent used (gallons), and 4.) The type of cleaning activity for each solvent that is being used in accordance with the applicable cleaning category specified in Section 5.4, Table 5 of Rule 4604 (9/20/07). [District Rule 4604] Federally Enforceable Through Title V Permit
40. The permittee shall keep daily records of key operating parameters, that is, differential pressures of the booth and PTE and RTO combustion chamber temperature. [District Rules 2201 and 4604] Federally Enforceable Through Title V Permit
41. The records showing violation of key operating parameters, that is, differential pressures for the booth and PTE and RTO combustion chamber temperature shall be reported to the District within 96 hours following the occurrence. Such records include an explanation of the cause of the violation and corrective action taken. [District Rule 2201 and 4604] Federally Enforceable Through Title V Permit
42. The O/M Plan shall be updated prior to any planned change in operation of the VOC emission control system. The operator may request a change to the O/M Plan at any time. If the O/M Plan undergoes significant changes to one or more O/M Plan elements, an operator must notify the District no later than 7 days after the change, and must submit an updated O/M Plan to the District for approval no later than 14 days after the change. [District Rule 4604] Federally Enforceable Through Title V Permit
43. An O/M Plan is not required for an inactive VOC emission control system until 180 days before start-up. A period of shorter than 180 days may be allowed if it can be shown that the equipment will be started up sooner than expected. [District Rule 4604] Federally Enforceable Through Title V Permit
44. The operator shall retain all records for a minimum of five years, make the records available on site during normal business hours to the APCO, ARB, or EPA, and submit the records to the APCO, ARB, or EPA upon request. [District Rules 2201 and 4604] Federally Enforceable Through Title V Permit

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

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1330-6-4

EXPIRATION DATE: 09/30/2017

EQUIPMENT DESCRIPTION:

CAN AND COIL COATING OPERATION #5: EXTERIOR HEAD PARTS COATING BOOTH IN A PERMANENT TOTAL ENCLOSURE (PTE); AND A 3.9 MMBTU/HR DIRECT-FIRED NATURAL GAS BLUE SURF OVEN SHARED BY PERMITS N-1330-3 AND '-6. THE BOOTH ENCLOSURE AND THE CURING OVEN ARE VENTED TO A COMMON 4.6 MMBTU/HR NATURAL GAS-FIRED REGENERATIVE THERMAL OXIDIZER (RTO) SHARED AMONG PERMITS N-1330-2, '-3, '-4, '-5, '-6 AND '-7

PERMIT UNIT REQUIREMENTS

1. VOC emissions from the entire stationary source shall not exceed 19,999 pounds in any 12 consecutive month rolling period. The permittee shall maintain monthly records of VOC emissions to demonstrate compliance with this condition. [District Rule 2201] Federally Enforceable Through Title V Permit
2. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
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. Exhaust fans shall be switched on prior to the start of paint spraying operations. [District Rule 2201] Federally Enforceable Through Title V Permit
6. All filters shall be properly maintained and must be in place during the painting operation. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Emissions from the coating operation (paint and solvent use) shall not exceed any of following limits: 12.9 lb-VOC/day and 1,407 lb-VOC/year; and 0.2 lb-PM10/day and 20 lb-PM10/year. [District Rule 2201] Federally Enforceable Through Title V Permit
8. VOC emissions shall be estimated as follows: $VOC (lb/day, lb/yr) = (Volume\ of\ coatings\ used\ (gal/day, gal/yr) \times material\ VOC\ content\ (lb-VOC/gal) + solvent\ use\ inside\ enclosure(s)\ vented\ to\ VOC\ control\ system\ (gal/day, gal/yr) \times VOC\ content\ (lb/gal)) \times (1 - overall\ capture\ and\ control\ efficiency\ (%)) + solvent\ use\ outside\ enclosure(s)\ not\ vented\ to\ VOC\ control\ system\ (gal/day, gal/yr) \times VOC\ content\ (lb/gal)$. [District Rule 2201] Federally Enforceable Through Title V Permit
9. PM10 emissions shall be estimated as follows: $PM10 (lb/day, lb/yr) = Volume\ of\ coating\ used\ (gal/day, gal/yr) \times solids\ content\ (by\ weight) \times coating\ density\ (lb/gallon) \times F \times (1 - TE) \times (1 - CE)$, where F is the fraction (%) of the solids 10 micron or less, if not available, F can be set equal to 1; TE is the coating transfer efficiency of the application equipment, for HVLP/electrostatic use 80%, and for brush, dip, or roll coating application equipment use 100%, and CE is the booth filter control efficiency for PM10. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

10. The operator shall hire a third party contractor to de-rate the curing oven using a fuel restricting orifice (or equivalent permanent devices) such that the rated heat input shall not exceed 4.9 MMBtu/hr. The permittee shall keep all records including but not limited to scope of work, date of work performed, bill of materials purchased/replaced, new heat input rate, name of the personnel performing the work and company affiliation. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit
11. Emissions from natural gas combustion in the curing oven shall not exceed any of the following limits: 0.1 lb-NO_x/MMBtu, 0.00285 lb-SO_x/MMBtu, 0.0076 lb-PM₁₀/MMBtu, 0.084 lb-CO/MMBtu, and 0.0055 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The combined VOC emissions from permit units N-1330-2, '-3, '-4, '-5, '-6 and '-7 including natural gas combustion in the RTO shall not exceed 216.7 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Emissions from natural gas combustion in the RTO shall not exceed any of the following limits: 0.036 lb-NO_x/MMBtu, 0.00285 lb-SO_x/MMBtu, 0.0076 lb-PM₁₀/MMBtu, 0.295 lb-CO/MMBtu, and 0.0055 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The VOC emission control system shall have an overall capture and control efficiency of at least 90 percent by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
15. The maximum differential pressure across the spray booth exhaust filters shall be 4 inches of water column and the minimum pressure differential across the PTE shall be 0 inches of water column. [District Rule 2201] Federally Enforceable Through Title V Permit
16. The differential pressure across the spray booth exhaust filter and the PTE shall be continuously measured using permanently installed device(s) to demonstrate on-going compliance with the overall capture and control efficiency. The measured differential readings shall be compared with the values established in this permit to detect and correct any problems with filter media, exhaust fans, enclosures or other similar apparatus in the system. [District Rule 2201] Federally Enforceable Through Title V Permit
17. The RTO shall be in operation, at or above the minimum operating chamber temperature being established during the initial source test, when any coating process operates. [District Rule 2201] Federally Enforceable Through Title V Permit
18. The RTO chambers shall be permanently equipped with temperature measurement devices such as thermocouples. The combustion temperature shall be continuously monitored and recorded whenever any coating process operates. [District Rule 2201] Federally Enforceable Through Title V Permit
19. The minimum temperature in the RTO combustion chamber shall be 1,400 °F. [District Rule 2201] Federally Enforceable Through Title V Permit
20. Sampling facilities for source testing shall be provided in accordance with the provisions of Rule 1081 (Source Sampling). [District Rule 1081] Federally Enforceable Through Title V Permit
21. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
22. Source testing to determine RTO control efficiency for VOC shall be conducted at least once every 12 months. [District Rule 2201] Federally Enforceable Through Title V Permit
23. All emissions measurements shall be made with the units operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-lighting of the unit resulting from an unscheduled or unavoidable shut off of the fuel flow or electrical power to the unit. [District Rule 2201] Federally Enforceable Through Title V Permit
24. For source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

25. VOC capture efficiency shall be determined according to EPA's "Guidelines for Determining Capture Efficiency," January 9, 1995 and 40 CFR 51, Appendix M, Methods 204-204F, as applicable, or any other method approved by EPA, ARB and the District. [District Rules 2201 and 4604] Federally Enforceable Through Title V Permit
26. The RTO control efficiency shall be determined using EPA Methods 2, 2A, or 2D for measuring flow rates and EPA Methods 25, 25A, or 25B for measuring total gaseous organic concentrations at the inlet and outlet of the control device. EPA Method 18 or ARB Method 422 shall be used to determine the emissions of exempt compounds. Should the permittee decide to use a different test methodology, the methodology must first be approved by the District. [District Rules 2201 and 4604] Federally Enforceable Through Title V Permit
27. The results of each source test shall be submitted to the District within 60 days after the test. [District Rule 1081] Federally Enforceable Through Title V Permit
28. VOC content of solvents used shall not exceed 25 g/l (0.21 lb/gal) for product cleaning during manufacturing process or surface preparation for coating application, or repair and maintenance cleaning, or cleaning of coating application equipment, unless such cleaning operations are carried out within the control that meet the requirements of section 5.2 of Rule 4604 (9/20/07). [District Rule 4604] Federally Enforceable Through Title V Permit
29. VOC content of coatings as applied, excluding water and exempt compounds, used for drums and lids coating operations, shall not exceed any of the following limits, unless such coating operations are carried out within the control system that meet the requirements of section 5.2 of Rule 4604 (9/20/07) provided in the condition below: sheet base coating (interior or exterior) 225g/l (1.875 lb/gallon) using any application method, interior body spray: 420 g/l (3.5 lb/gallon) for new and 510 g/l (4.25 lb/gallon) for reconditioned using spray application method, exterior body spray: 340 g/l (2.83 lb/gallon) for new and 420 g/l (3.5 lb/gallon) for reconditioned using spray application method, overvarnish (interior or exterior) 225 g/l (1.875 lb/gallon) using any application method, interior end coating: 420 g/l (3.5 lb/gallon) for new and 510 g/l (4.25 lb/gallon) for reconditioned using spray or roll coat application method, exterior end coating: 340 g/l (2.83 lb/gallon) for new and 420 g/l (3.5 lb/gallon) for reconditioned using spray or roll coat application method, side seam coating 660 g/l (5.5 lb/gallon) using spray application method, and end seal compound 60 g/l (0.5 lb/gallon) using any application method. [District Rule 4604] Federally Enforceable Through Title V Permit
30. The use of coatings and solvents with VOC content in excess of the applicable limits (mentioned in the above condition) shall be allowed, provided that each of the following are met: 1.) The VOC emission control system shall have an overall capture and control efficiency of at least 90% on weight basis during emission producing activities, 2.) The VOC emission control system reduce VOC emissions, at all times, to a level that is not greater than the emission level which would have been achieved through the use of materials compliant with the applicable requirements of Section 5.1 and Section 5.4 of Rule 4604 (9/20/07) during emission producing activities, 3.) The operator shall monitor key system operating parameters of VOC emission control system (i.e. differential pressures established for booth and PTE to ensure proper capture, and established minimum RTO chamber temperature), 4.) The operator shall implement an Operation and Maintenance (O/M) Plan pursuant to Section 6.5 of Rule 4604 (9/20/07) with 10 days of approval of the plan, 5.) The operator shall perform source test at least once every 12 months to determine control efficiency of the control system (RTO system) using non-compliant coating and under the conditions specified in the Permit to Operate. [District Rule 4604] Federally Enforceable Through Title V Permit
31. All fresh or spent solvents, waste solvent cleaning materials such as cloth, paper etc., coatings, adhesives, catalysts, thinners and solvents shall be stored in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4604] Federally Enforceable Through Title V Permit
32. Coatings shall be applied with properly operating coating equipment. [District Rule 4604] Federally Enforceable Through Title V Permit
33. The coating application equipment shall be operated according to operating procedures specified by the equipment manufacturer. [District Rule 4604] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

34. Only electrostatic application, flow coater, roll coater, dip coater, hand application methods, HVLP spray, or any other application method that demonstrates to the District and EPA, a coating transfer efficiency of at least 65% as measured using a test method per section 6.7.4 of Rule 4604 (9/20/07) shall be used under this permit. In lieu of complying with this requirement, the operator may control emissions from application equipment with the VOC emission control system that meet the requirements of section 5.2 of Rule 4604 (9/20/07). [District Rule 4604] Federally Enforceable Through Title V Permit
35. For HVLP spray guns manufactured prior to January 1, 1996, the end user shall demonstrate that the gun meets HVLP spray equipment standards. Satisfactory proof will be either in the form of a manufacturer's published technical material or by a demonstration using a certified air pressure tip gauge, measuring the air atomizing pressure dynamically at the center of the air cap and at the air horns. [District Rule 4604] Federally Enforceable Through Title V Permit
36. The operator shall maintain and have available on site, a current list of coatings in use which provides all of the coating data necessary to evaluate compliance including the following information, as applicable: 1.) Specific manufacturer's name of coatings, catalysts and thinners used, 2.) Mix ratio of components used, and 3.) VOC content of each coating, as applied in g/l or lb/gal. [District Rule 4604] Federally Enforceable Through Title V Permit
37. The operator shall maintain daily records of the following items: 1.) Specific coating used and mix ratio of components added to the coating material prior to application, 2.) Volume of coatings applied (gallons), 3.) Specific solvents, catalysts and thinners used, and 4) Volume of each solvent, catalyst and thinner (gallons). [District Rule 4604] Federally Enforceable Through Title V Permit
38. The operator shall maintain and have available on site, a current list of cleaning solvents in use that provides all of the data necessary to evaluate compliance including the following information, as applicable: 1.) The name of the cleaning solvent and its manufacturer's name, and 2.) VOC content of the solvent expressed in g/l or lb/gal, as applied. [District Rule 4604] Federally Enforceable Through Title V Permit
39. The operator shall maintain daily records of the following items: 1.) Name of cleaning solvents used, 2.) When the solvent is a mixture of different materials that are blended by the operator, the mix ratio of the batch shall be recorded and the VOC content of the batch shall be calculated and recorded in order to determine compliance with the specified limits of VOC content. Records from before November 15, 2003 must still be retained on-site for five years from date of record, 3.) Volume of each cleaning solvent used (gallons), and 4.) The type of cleaning activity for each solvent that is being used in accordance with the applicable cleaning category specified in Section 5.4, Table 5 of Rule 4604 (9/20/07). [District Rule 4604] Federally Enforceable Through Title V Permit
40. The permittee shall keep daily records of key operating parameters, that is, differential pressures of the booth and PTE and RTO combustion chamber temperature. [District Rules 2201 and 4604] Federally Enforceable Through Title V Permit
41. The records showing violation of key operating parameters, that is, differential pressures for the booth and PTE and RTO combustion chamber temperature shall be reported to the District within 96 hours following the occurrence. Such records include an explanation of the cause of the violation and corrective action taken. [District Rule 2201 and 4604] Federally Enforceable Through Title V Permit
42. The O/M Plan shall be updated prior to any planned change in operation of the VOC emission control system. The operator may request a change to the O/M Plan at any time. If the O/M Plan undergoes significant changes to one or more O/M Plan elements, an operator must notify the District no later than 7 days after the change, and must submit an updated O/M Plan to the District for approval no later than 14 days after the change. [District Rule 4604] Federally Enforceable Through Title V Permit
43. An O/M Plan is not required for an inactive VOC emission control system until 180 days before start-up. A period of shorter than 180 days may be allowed if it can be shown that the equipment will be started up sooner than expected. [District Rule 4604] Federally Enforceable Through Title V Permit
44. The operator shall retain all records for a minimum of five years, make the records available on site during normal business hours to the APCO, ARB, or EPA, and submit the records to the APCO, ARB, or EPA upon request. [District Rules 2201 and 4604] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1330-7-8

EXPIRATION DATE: 09/30/2017

EQUIPMENT DESCRIPTION:

CAN AND COIL COATING OPERATION #6: HEAD AND BOTTOM PART SHEET ROLL COATER SYSTEM CONSISTING OF A WAGNER ROLL COAT MACHINE IN A PERMANENT TOTAL ENCLOSURE (PTE) AND A 12 MMBTU/HR WAGNER PAINT CURING OVEN WITH MAXON NP BURNER SYSTEM. THE ENCLOSURE AND THE CURING OVEN ARE VENTED TO A 4.6 MMBTU/HR NATURAL GAS-FIRED REGENERATIVE THERMAL OXIDIZER (RTO) SHARED AMONG PERMITS N-1330-2, '-3, '-4, '-5, '-6 AND '-7

PERMIT UNIT REQUIREMENTS

1. VOC emissions from the entire stationary source shall not exceed 19,999 pounds in any 12 consecutive month rolling period. The permittee shall maintain monthly records of VOC emissions to demonstrate compliance with this condition. [District Rule 2201] Federally Enforceable Through Title V Permit
2. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
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. Exhaust fans shall be switched on prior to the start of paint spraying operations. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Emissions from the coating operation (paint and solvent use) shall not exceed any of following limits: 74.6 lb-VOC/day and 13,526 lb-VOC/year; and 9.2 lb-PM10/day and 3,358 lb-PM10/year. [District Rule 2201] Federally Enforceable Through Title V Permit
7. VOC emissions shall be estimated as follows: $\text{VOC (lb/day, lb/yr)} = (\text{Volume of coatings used (gal/day, gal/yr)} \times \text{material VOC content (lb-VOC/gal)} + \text{solvent use inside enclosure(s) vented to VOC control system (gal/day, gal/yr)} \times \text{VOC content (lb/gal)}) \times (1 - \text{overall capture and control efficiency (\%)}) + \text{solvent use outside enclosure(s) not vented to VOC control system (gal/day, gal/yr)} \times \text{VOC content (lb/gal)}$. [District Rule 2201] Federally Enforceable Through Title V Permit
8. PM10 emissions shall be estimated as follows: $\text{PM10 (lb/day, lb/yr)} = \text{Volume of coating used (gal/day, gal/yr)} \times \text{solids content (by weight)} \times \text{coating density (lb/gallon)} \times F \times (1 - \text{TE}) \times (1 - \text{CE})$, where F is the fraction (%) of the solids 10 micron or less, if not available, F can be set equal to 1; TE is the coating transfer efficiency of the application equipment, for HVLP/electrostatic use 80%, and for brush, dip, or roll coating application equipment use 100%, and CE is the booth filter control efficiency for PM10. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Emissions from the curing oven shall not exceed any of the following limits: 4.3 ppmvd NOx @ 19% O2 (or 4.3 ppmvd if oven stack O2 exceeds 19% vol.) and 42 ppmvd CO @ 19% O2 (or 42 ppmvd if oven stack O2 exceeds 19% vol.). These emissions include emissions from combustion process as well as process emissions. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

10. Emissions from the natural gas combustion in the curing oven shall not exceed any of the following limits 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, and 0.0055 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The combined VOC emissions from permit units N-1330-2, '-3, '-4, '-5, '-6 and '-7 including natural gas combustion in the RTO shall not exceed 216.7 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Emissions from natural gas combustion in the RTO shall not exceed any of the following limits: 0.036 lb-NOx/MMBtu, 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 0.295 lb-CO/MMBtu, and 0.0055 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The VOC emission control system shall have an overall capture and control efficiency of at least 90 percent by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The pressure differential range across the roll coat system shall be a maximum of 4 inches and minimum of 0 inches water column. [District Rule 2201] Federally Enforceable Through Title V Permit
15. The differential pressure across the PTE shall be continuously measured using permanently installed device(s) to demonstrate on-going compliance with the capture efficiency. The measured differential readings shall be compared with the values established in this permit to detect and correct any problems with filter media, exhaust fans, enclosures or other similar apparatus in the system. [District Rule 2201] Federally Enforceable Through Title V Permit
16. The RTO shall be in operation, at or above the minimum operating chamber temperature being established during the initial source test, when any coating process operates. [District Rule 2201] Federally Enforceable Through Title V Permit
17. The RTO shall reduce at least 95% of the captured VOC emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
18. The RTO chambers shall be permanently equipped with temperature measurement devices such as thermocouples. The combustion temperature shall be continuously monitored and recorded whenever any coating process operates. [District Rule 2201] Federally Enforceable Through Title V Permit
19. The minimum temperature in the RTO combustion chamber shall be 1,400 °F. [District Rule 2201] Federally Enforceable Through Title V Permit
20. Sampling facilities for source testing shall be provided in accordance with the provisions of Rule 1081 (Source Sampling). [District Rule 1081] Federally Enforceable Through Title V Permit
21. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
22. Source testing to determine RTO control efficiency for VOC shall be conducted at least once every 12 months. [District Rule 2201] Federally Enforceable Through Title V Permit
23. Source testing to measure NOx and CO emissions from the curing oven shall be conducted at least once every 24 months; or at least once every 36 months if the curing oven operates less than 50 days per calendar year. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit
24. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4309. [District Rule 4309] Federally Enforceable Through Title V Permit
25. For source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

26. The capture efficiency shall be determined according to EPA's "Guidelines for Determining Capture Efficiency," January 9, 1995 and 40 CFR 51, Appendix M, Methods 204-204F, as applicable, or any other method approved by EPA, ARB and the District. [District Rules 2201 and 4604] Federally Enforceable Through Title V Permit
27. The RTO control efficiency shall be determined using EPA Methods 2, 2A, or 2D for measuring flow rates and EPA Methods 25, 25A, or 25B for measuring total gaseous organic concentrations at the inlet and outlet of the control device. EPA Method 18 or ARB Method 422 shall be used to determine the emissions of exempt compounds. Should the permittee decide to use a different test methodology, the methodology must first be approved by the District. [District Rules 2201 and 4604] Federally Enforceable Through Title V Permit
28. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis. [District Rule 4309] Federally Enforceable Through Title V Permit
29. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rule 4309] Federally Enforceable Through Title V Permit
30. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4309] Federally Enforceable Through Title V Permit
31. Stack gas velocities shall be determined using EPA Method 2. [District Rule 4309] Federally Enforceable Through Title V Permit
32. Stack gas moisture content shall be determined using EPA Method 4. [District Rule 4309] Federally Enforceable Through Title V Permit
33. The results of each source test shall be submitted to the District within 60 days after the test. [District Rule 1081] Federally Enforceable Through Title V Permit
34. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rule 4309] Federally Enforceable Through Title V Permit
35. If either the NOx or CO concentrations corrected to 19% O2 (or no correction if measured above 19% O2), as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rule 4309] Federally Enforceable Through Title V Permit
36. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4309] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

37. VOC content of coatings as applied, excluding water and exempt compounds, used for drums and lids coating operations, shall not exceed any of the following limits, unless such coating operations are carried out within the control system that meet the requirements of section 5.2 of Rule 4604 (9/20/07) provided in the condition below: sheet base coating (interior or exterior) 225g/l (1.875 lb/gallon) using any application method, interior body spray: 420 g/l (3.5 lb/gallon) for new and 510 g/l (4.25 lb/gallon) for reconditioned using spray application method, exterior body spray: 340 g/l (2.83 lb/gallon) for new and 420 g/l (3.5 lb/gallon) for reconditioned using spray application method, overvarnish (interior or exterior) 225 g/l (1.875 lb/gallon) using any application method, interior end coating: 420 g/l (3.5 lb/gallon) for new and 510 g/l (4.25 lb/gallon) for reconditioned using spray or roll coat application method, exterior end coating: 340 g/l (2.83 lb/gallon) for new and 420 g/l (3.5 lb/gallon) for reconditioned using spray or roll coat application method, side seam coating 660 g/l (5.5 lb/gallon) using spray application method, and end seal compound 60 g/l (0.5 lb/gallon) using any application method. [District Rule 4604] Federally Enforceable Through Title V Permit
38. VOC content of solvents used shall not exceed 25 g/l (0.21 lb/gal) for product cleaning during manufacturing process or surface preparation for coating application, or repair and maintenance cleaning, or cleaning of coating application equipment, unless such cleaning operations are carried out within the control that meet the requirements of section 5.2 of Rule 4604 (9/20/07). [District Rule 4604] Federally Enforceable Through Title V Permit
39. The use of coatings and solvents with VOC content in excess of the applicable limits (mentioned in the above conditions) shall be allowed, provided that each of the following are met: 1.) The VOC emission control system shall have an overall capture and control efficiency of at least 90% on weight basis during emission producing activities, 2.) The VOC emission control system reduce VOC emissions, at all times, to a level that is not greater than the emission level which would have been achieved through the use of materials compliant with the applicable requirements of Section 5.1 and Section 5.4 of Rule 4604 (9/20/07) during emission producing activities, 3.) The operator shall monitor key system operating parameters of VOC emission control system ((i.e. differential pressure established for the enclosure to ensure proper capture, and established minimum RTO chamber temperature), 4.) The operator shall implement an Operation and Maintenance (O/M) Plan pursuant to Section 6.5 of Rule 4604 (9/20/07) with 10 days of approval of the plan, 5.) The operator shall perform source test at least once every 12 months to determine control efficiency of the control system (RTO system) using non-compliant coating and under the conditions specified in the Permit to Operate. [District Rule 4604] Federally Enforceable Through Title V Permit
40. All fresh or spent solvents, waste solvent cleaning materials such as cloth, paper etc., coatings, adhesives, catalysts, thinners and solvents shall be stored in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4604] Federally Enforceable Through Title V Permit
41. Coatings shall be applied with properly operating coating equipment. [District Rule 4604] Federally Enforceable Through Title V Permit
42. The coating application equipment shall be operated according to operating procedures specified by the equipment manufacturer. [District Rule 4604] Federally Enforceable Through Title V Permit
43. Only electrostatic application, flow coater, roll coater, dip coater, hand application methods, HVLP spray, or any other application method that demonstrates to the District and EPA, a coating transfer efficiency of at least 65% as measured using a test method per section 6.7.4 of Rule 4604 (9/20/07) shall be used under this permit. In lieu of complying with this requirement, the operator may control emissions from application equipment with the VOC emission control system that meet the requirements of section 5.2 of Rule 4604 (9/20/07). [District Rule 4604] Federally Enforceable Through Title V Permit
44. For HVLP spray guns manufactured prior to January 1, 1996, the end user shall demonstrate that the gun meets HVLP spray equipment standards. Satisfactory proof will be either in the form of a manufacturer's published technical material or by a demonstration using a certified air pressure tip gauge, measuring the air atomizing pressure dynamically at the center of the air cap and at the air horns. [District Rule 4604] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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45. The operator shall maintain and have available on site, a current list of coatings in use which provides all of the coating data necessary to evaluate compliance including the following information, as applicable: 1.) Specific manufacturer's name of coatings, catalysts and thinners used, 2.) Mix ratio of components used, and 3.) VOC content of each coating, as applied in g/l or lb/gal. [District Rule 4604] Federally Enforceable Through Title V Permit
46. The operator shall maintain daily records of the following items: 1.) Specific coating used and mix ratio of components added to the coating material prior to application, 2.) Volume of coatings applied (gallons), 3.) Specific solvents, catalysts and thinners used, and 4) Volume of each solvent, catalyst and thinner (gallons). [District Rule 4604] Federally Enforceable Through Title V Permit
47. The operator shall maintain and have available on site, a current list of cleaning solvents in use that provides all of the data necessary to evaluate compliance including the following information, as applicable: 1.) The name of the cleaning solvent and its manufacturer's name, and 2.) VOC content of the solvent expressed in g/l or lb/gal, as applied. [District Rule 4604] Federally Enforceable Through Title V Permit
48. The operator shall maintain daily records of the following items: 1.) Name of cleaning solvents used, 2.) When the solvent is a mixture of different materials that are blended by the operator, the mix ratio of the batch shall be recorded and the VOC content of the batch shall be calculated and recorded in order to determine compliance with the specified limits of VOC content. Records from before November 15, 2003 must still be retained on-site for five years from date of record, 3.) Volume of each cleaning solvent used (gallons), and 4.) The type of cleaning activity for each solvent that is being used in accordance with the applicable cleaning category specified in Section 5.4, Table 5 of Rule 4604 (9/20/07). [District Rule 4604] Federally Enforceable Through Title V Permit
49. The permittee shall keep daily records of key operating parameters, that is, differential pressures of the PTE and RTO combustion chamber temperature. [District Rules 2201 and 4604] Federally Enforceable Through Title V Permit
50. The records showing violation of key operating parameters, that is, differential pressures for the booth and PTE and RTO combustion chamber temperature shall be reported to the District within 96 hours following the occurrence. Such records include an explanation of the cause of the violation and corrective action taken. [District Rule 2201 and 4604] Federally Enforceable Through Title V Permit
51. The O/M Plan shall be updated prior to any planned change in operation of the VOC emission control system. The operator may request a change to the O/M Plan at any time. If the O/M Plan undergoes significant changes to one or more O/M Plan elements, an operator must notify the District no later than 7 days after the change, and must submit an updated O/M Plan to the District for approval no later than 14 days after the change. [District Rule 4604] Federally Enforceable Through Title V Permit
52. An O/M Plan is not required for an inactive VOC emission control system until 180 days before start-up. A period of shorter than 180 days may be allowed if it can be shown that the equipment will be started up sooner than expected. [District Rule 4604] Federally Enforceable Through Title V Permit
53. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 19% O₂ (or no correction if measured above 19% O₂), (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rule 4309] Federally Enforceable Through Title V Permit
54. The permittee shall maintain daily records of hours of operations, type and quantity of fuel used in the oven. [District Rule 4309] Federally Enforceable Through Title V Permit
55. All test results for NO_x and CO shall be reported in ppmv @ 19% O₂ (or no correction if measured above 19% O₂), corrected to dry stack conditions. [District Rule 4309] Federally Enforceable Through Title V Permit
56. The operator shall retain all records for a minimum of five years, make the records available on site during normal business hours to the APCO, ARB, or EPA, and submit the records to the APCO, ARB, or EPA upon request. [District Rules 2201 and 4604] Federally Enforceable Through Title V Permit

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

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1330-15-4

EXPIRATION DATE: 09/30/2017

EQUIPMENT DESCRIPTION:

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

PERMIT UNIT REQUIREMENTS

1. VOC emissions from the entire stationary source shall not exceed 19,999 pounds in any 12 consecutive month rolling period. The permittee shall maintain monthly records of VOC emissions to demonstrate compliance with this condition. [District Rule 2201] Federally Enforceable Through Title V Permit
2. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] 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. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
6. The unit shall only be fired on PUC-quality natural gas. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
7. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of natural gas combusted in the unit shall be installed, utilized and maintained. [District Rules 2201, 4305, and 4306] Federally Enforceable Through Title V Permit
8. Heat input to this unit shall not exceed 30 billion Btu per calendar year. [District Rules 2201, 4305 and 4306] Federally Enforceable Through Title V Permit
9. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NOx emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NOx emission limit listed in Rule 4320. [District Rule 4320] Federally Enforceable Through Title V Permit
10. Emissions rates from the natural gas-fired unit shall not exceed any of the following limits: 30 ppmv NOx @ 3% O2 or 0.036 lb-NOx/MMBtu, 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 100 ppmv CO @ 3% O2 or 0.073 lb-CO/MMBtu, or 10 ppmv @ 3% O2 0.0042 lb-VOC/MMBtu. [District Rules 2201, 4305, and 4306] Federally Enforceable Through Title V Permit
11. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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12. Source testing to measure NO_x and CO emissions from this unit while fired on natural gas shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
13. During the 36-month source testing interval, the owner/operator shall have unit tuned at least twice each calendar year, from four to eight months apart, in which it operates, by a technician that is qualified, to the satisfaction of the APCO, in accordance with the procedure described in Rule 4304 (Equipment Tuning Procedure for Boilers, Steam Generators, and Process Heaters). [District Rules 4306 and 4320] Federally Enforceable Through Title V Permit
14. If the unit does not operate throughout a continuous six-month period within a calendar year, only one tune-up is required for that calendar year. No tune-up is required for any unit that is not operated during that calendar year; this unit may be test fired to verify availability of the unit for its intended use, but once the test firing is completed the unit shall be shutdown. [District Rules 4306 and 4320] Federally Enforceable Through Title V Permit
15. NO_x emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
16. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
17. Stack gas oxygen (O₂) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
18. Fuel sulfur content shall be determined using EPA Method 11 or Method 15. [District Rule 4320] Federally Enforceable Through Title V Permit
19. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
20. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4320. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
21. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
22. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
23. The flue gas recirculation valve(s) setting shall be monitored at least on a weekly basis. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last week. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
24. The acceptable settings for the flue gas recirculation valve(s) shall be established by source testing this unit or other representative units per Rule 4305 and as approved by the District. The normal range/level shall be that for which compliance with applicable NO_x and CO emissions rates have been demonstrated through source testing at a similar firing rate. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
25. Normal range or level for the flue gas recirculation valve(s) settings shall be re-established during each source test required by this permit. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

26. If the flue gas recirculation valve(s) setting is less than the normal range/level, the permittee shall return the flue gas recirculation valve(s) setting to the normal range/level as soon as possible, but no longer than 1 hour of operation after detection. If the flue gas recirculation valve(s) setting is not returned to the normal range/level within 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour, and conduct a source test within 60 days of the first exceedance, to demonstrate compliance with the applicable emission limits at the new flue gas recirculation valve(s) setting. A District-approved portable analyzer may be used in lieu of a source test to demonstrate compliance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
27. The permittee shall maintain records of the date and time of flue gas recirculation valve(s) settings, the observed setting, and the firing rate at the time of the flue gas recirculation valve(s) setting measurements. The records must also include a description of any corrective action taken to maintain the flue gas recirculation valve(s) setting within the acceptable range. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
28. Permittee shall determine sulfur content of combusted gas annually or shall demonstrate that the combusted gas is provided from a PUC or FERC regulated source. [District Rules 1081 and 4320] Federally Enforceable Through Title V Permit
29. Records of monthly and annual heat input of the unit shall be maintained. [District Rules 2201, 4305, and 4306] Federally Enforceable Through Title V Permit
30. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

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

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ATTACHMENT B

Authorities to Construct

No.s N-1330-2-3, -3-2, -4-2, -5-2, -6-3, -7-7, and -15-3



COPY

AUTHORITY TO CONSTRUCT

PERMIT NO: N-1330-2-3

ISSUANCE DATE: 12/03/2012

LEGAL OWNER OR OPERATOR: GREIF INDUSTRIAL PACKAGING & SERVS LLC
MAILING ADDRESS: P O BOX 2146
MERCED, CA 95344

LOCATION: 2400 COOPER AVE
MERCED, CA 95344

EQUIPMENT DESCRIPTION:

MODIFICATION OF CAN AND COIL COATING OPERATION CONSISTING OF A HEAD AND BOTTOM PART INTERIOR COATING BOOTH: INSTALL A REGENERATIVE THERMAL OXIDIZER (RTO) THAT WILL SERVE PERMIT UNITS N-1330-2, '-3, '-4, '-5, '-6, AND '-7; INSTALL PERMANENT TOTAL ENCLOSURES AROUND SPRAY PAINT BOOTH N-1330-2, '-3, '-4, '-5 AND '-6; ESTABLISH FACILITY-WIDE VOC LIMIT OF 19,999 POUNDS PER YEAR. THE POST-PROJECT EQUIPMENT DESCRIPTION WILL BE: CAN AND COIL COATING OPERATION #1: HEAD AND BOTTOM PART INTERIOR COATING BOOTH IN A PERMANENT TOTAL ENCLOSURE (PTE); AND A 4.9 MMBTU/HR (DE-RATED) DIRECT-FIRED NATURAL GAS WICKET PAINT CURING OVEN. THE BOOTH ENCLOSURE AND THE CURING OVEN ARE VENTED TO A 4.6 MMBTU/HR NATURAL GAS-FIRED REGENERATIVE THERMAL OXIDIZER (RTO) SHARED AMONG PERMITS N-1330-2, '-3, '-4, '-5, '-6 AND '-7

CONDITIONS

1. Upon implementation of Authorities to Construct N-1330-2-3, '-3-2, '-4-2, '-5-2, '-6-3, '-7-6 and '-15-3, the facility will no longer be a Major Source for NOx, VOC, and Greenhouse Gas (GHG) emissions, and the facility may submit a Title V Minor Modification permit application to remove the Title V status. [District Rule 2520]
2. Upon implementation of Authorities to Construct N-1330-2-3, '-3-2, '-4-2, '-5-2, '-6-3, '-7-6 and '-15-3, Permits to Operate N-1330-8, '-9 and '-10 shall be cancelled. [District Rule 2201]
3. VOC emissions from the entire stationary source shall not exceed 19,999 pounds in any 12 consecutive month rolling period. The permittee shall maintain monthly records of VOC emissions to demonstrate compliance with this condition. [District Rule 2201]
4. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
5. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]

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 Saadedin, Executive Director, APCO

DAVID WARNER, Director of Permit Services

N-1330-2-3 Dec 3 2012 10:01AM - 04:02:00 Joint Inspection NOT Required

6. 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]
7. Exhaust fans shall be switched on prior to the start of paint spraying operations. [District Rule 2201]
8. All filters shall be properly maintained and must be in place during the painting operation. [District Rule 2201]
9. Emissions from the coating operation (paint and solvent use) shall not exceed any of following limits: 26.4 lb-VOC/day and 3,682 lb-VOC/year; and 5.0 lb-PM10/day and 699 lb-PM10/year. [District Rule 2201]
10. VOC emissions shall be estimated as follows: $\text{VOC (lb/day, lb/yr)} = (\text{Volume of coatings used (gal/day, gal/yr)} \times \text{material VOC content (lb-VOC/gal)} + \text{solvent use inside enclosure(s) vented to VOC control system (gal/day, gal/yr)} \times \text{VOC content (lb/gal)}) \times (1 - \text{overall capture and control efficiency (\%)}) + \text{solvent use outside enclosure(s) not vented to VOC control system (gal/day, gal/yr)} \times \text{VOC content (lb/gal)}$. [District Rule 2201]
11. PM10 emissions shall be estimated as follows: $\text{PM10 (lb/day, lb/yr)} = \text{Volume of coating used (gal/day, gal/yr)} \times \text{solids content (by weight)} \times \text{coating density (lb/gallon)} \times F \times (1 - \text{TE}) \times (1 - \text{CE})$, where F is the fraction (%) of the solids 10 micron or less, if not available, F can be set equal to 1; TE is the coating transfer efficiency of the application equipment, for HVL P/electrostatic use 80%, and for brush, dip, or roll coating application equipment use 100%, and CE is the booth filter control efficiency for PM10. [District Rule 2201]
12. The operator shall hire a third party contractor to de-rate the curing oven using a fuel restricting orifice (or equivalent permanent devices) such that the rated heat input shall not exceed 4.9 MMBtu/hr. The permittee shall keep all records including but not limited to scope of work, date of work performed, bill of materials purchased/replaced, new heat input rate, name of the personnel performing the work and company affiliation. [District Rules 2201 and 4309]
13. Emissions from natural gas combustion in the curing oven shall not exceed any of the following limits: 0.1 lb-NOx/MMBtu, 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 0.084 lb-CO/MMBtu, and 0.0055 lb-VOC/MMBtu. [District Rule 2201]
14. The combined VOC emissions from permit units N-1330-2, '-3, '-4, '-5, '-6 and '-7 including natural gas combustion in the RTO shall not exceed 216.7 pounds in any one day. [District Rule 2201]
15. Emissions from natural gas combustion in the RTO shall not exceed any of the following limits: 0.036 lb-NOx/MMBtu, 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 0.295 lb-CO/MMBtu, and 0.0055 lb-VOC/MMBtu. [District Rule 2201]
16. The VOC emission control system shall have an overall capture and control efficiency of at least 90 percent by weight. [District Rule 2201]
17. The permittee shall establish a maximum differential pressure across the spray booth exhaust filters and a minimum pressure differential across the PTE while demonstrating compliance with the overall capture and control efficiency. These differential pressures shall be included in the Permit to Operate. [District Rule 2201]
18. The permittee shall install permanent device(s) to continuously measure the differential pressure across the spray booth exhaust filter and the PTE under this permit to demonstrate on-going compliance with the overall capture and control efficiency. The measured differential readings shall be compared with the values established in this permit to detect and correct any problems with filter media, exhaust fans, enclosures or other similar apparatus in the system. [District Rule 2201]
19. The RTO shall be in operation, at or above the minimum operating chamber temperature being established during the initial source test, when any coating process operates. [District Rule 2201]
20. The RTO chambers shall be permanently equipped with temperature measurement devices such as thermocouples. The combustion temperature shall be continuously monitored and recorded whenever any coating process operates. [District Rule 2201]
21. The minimum temperature in the RTO combustion chamber (°F) shall be established during the initial source test while achieving the required overall capture and control efficiency. This temperature measurement shall be listed in the Permit to Operate. [District Rule 2201]
22. Sampling facilities for source testing shall be provided in accordance with the provisions of Rule 1081 (Source Sampling). [District Rule 1081]

CONDITIONS CONTINUE ON NEXT PAGE

23. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081]
24. Source testing to determine VOC capture efficiency of the enclosure set-up (booth and PTE) under this permit shall be conducted within 60 days of startup under this permit. [District Rule 2201]
25. Source testing to determine RTO control efficiency for VOC shall be conducted within 60 days of startup under this permit and at least once every 12 months thereafter. [District Rule 2201]
26. All emissions measurements shall be made with the units operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-lighting of the unit resulting from an unscheduled or unavoidable shut off of the fuel flow or electrical power to the unit. [District Rule 2201]
27. For source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rule 2201]
28. VOC capture efficiency shall be determined according to EPA's "Guidelines for Determining Capture Efficiency," January 9, 1995 and 40 CFR 51, Appendix M, Methods 204-204F, as applicable, or any other method approved by EPA, ARB and the District. [District Rules 2201 and 4604]
29. The RTO control efficiency shall be determined using EPA Methods 2, 2A, or 2D for measuring flow rates and EPA Methods 25, 25A, or 25B for measuring total gaseous organic concentrations at the inlet and outlet of the control device. EPA Method 18 or ARB Method 422 shall be used to determine the emissions of exempt compounds. Should the permittee decide to use a different test methodology, the methodology must first be approved by the District. [District Rules 2201 and 4604]
30. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081]
31. VOC content of solvents used shall not exceed 25 g/l (0.21 lb/gal) for product cleaning during manufacturing process or surface preparation for coating application, or repair and maintenance cleaning, or cleaning of coating application equipment, unless such cleaning operations are carried out within the control that meet the requirements of section 5.2 of Rule 4604 (9/20/07). [District Rule 4604]
32. VOC content of coatings as applied, excluding water and exempt compounds, used for drums and lids coating operations, shall not exceed any of the following limits, unless such coating operations are carried out within the control system that meet the requirements of section 5.2 of Rule 4604 (9/20/07) provided in the condition below: sheet base coating (interior or exterior) 225g/l (1.875 lb/gallon) using any application method, interior body spray: 420 g/l (3.5 lb/gallon) for new and 510 g/l (4.25 lb/gallon) for reconditioned using spray application method, exterior body spray: 340 g/l (2.83 lb/gallon) for new and 420 g/l (3.5 lb/gallon) for reconditioned using spray application method, overvarnish (interior or exterior) 225 g/l (1.875 lb/gallon) using any application method, interior end coating: 420 g/l (3.5 lb/gallon) for new and 510 g/l (4.25 lb/gallon) for reconditioned using spray or roll coat application method, exterior end coating: 340 g/l (2.83 lb/gallon) for new and 420 g/l (3.5 lb/gallon) for reconditioned using spray or roll coat application method, side seam coating 660 g/l (5.5 lb/gallon) using spray application method, and end seal compound 60 g/l (0.5 lb/gallon) using any application method. [District Rule 4604]

33. The use of coatings and solvents with VOC content in excess of the applicable limits (mentioned in the above condition) shall be allowed, provided that each of the following are met: 1.) The VOC emission control system shall have an overall capture and control efficiency of at least 90% on weight basis during emission producing activities, 2.) The VOC emission control system reduce VOC emissions, at all times, to a level that is not greater than the emission level which would have been achieved through the use of materials compliant with the applicable requirements of Section 5.1 and Section 5.4 of Rule 4604 (9/20/07) during emission producing activities, 3.) The operator shall monitor key system operating parameters of VOC emission control system (i.e. differential pressures established for booth and PTE to ensure proper capture, and established minimum RTO chamber temperature), 4.) The operator shall implement an Operation and Maintenance (O/M) Plan pursuant to Section 6.5 of Rule 4604 (9/20/07) with 10 days of approval of the plan, 5.) The operator shall perform source test at least once every 12 months to determine control efficiency of the control system (RTO system) using non-compliant coating and under the conditions specified in the Permit to Operate. [District Rule 4604]
34. All fresh or spent solvents, waste solvent cleaning materials such as cloth, paper etc., coatings, adhesives, catalysts, thinners and solvents shall be stored in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4604]
35. Coatings shall be applied with properly operating coating equipment. [District Rule 4604]
36. The coating application equipment is operated according to operating procedures specified by the equipment manufacturer. [District Rule 4604]
37. Only electrostatic application, flow coater, roll coater, dip coater, hand application methods, HVLP spray, or any other application method that demonstrates to the District and EPA, a coating transfer efficiency of at least 65% as measured using a test method per section 6.7.4 of Rule 4604 (9/20/07) shall be used under this permit. In lieu of complying with this requirement, the operator may control emissions from application equipment with the VOC emission control system that meet the requirements of section 5.2 of Rule 4604 (9/20/07). [District Rule 4604]
38. For HVLP spray guns manufactured prior to January 1, 1996, the end user shall demonstrate that the gun meets HVLP spray equipment standards. Satisfactory proof will be either in the form of a manufacturer's published technical material or by a demonstration using a certified air pressure tip gauge, measuring the air atomizing pressure dynamically at the center of the air cap and at the air horns. [District Rule 4604]
39. The operator shall maintain and have available on site, a current list of coatings in use which provides all of the coating data necessary to evaluate compliance including the following information, as applicable: 1.) Specific manufacturer's name of coatings, catalysts and thinners used, 2.) Mix ratio of components used, and 3.) VOC content of each coating, as applied in g/l or lb/gal. [District Rule 4604]
40. The operator shall maintain daily records of the following items: 1.) Specific coating used and mix ratio of components added to the coating material prior to application, 2.) Volume of coatings applied (gallons), 3.) Specific solvents, catalysts and thinners used, and 4) Volume of each solvent, catalyst and thinner (gallons). [District Rule 4604]
41. The operator shall maintain and have available on site, a current list of cleaning solvents in use that provides all of the data necessary to evaluate compliance including the following information, as applicable: 1.) The name of the cleaning solvent and its manufacturer's name, and 2.) VOC content of the solvent expressed in g/l or lb/gal, as applied. [District Rule 4604]
42. The operator shall maintain daily records of the following items: 1.) Name of cleaning solvents used, 2.) When the solvent is a mixture of different materials that are blended by the operator, the mix ratio of the batch shall be recorded and the VOC content of the batch shall be calculated and recorded in order to determine compliance with the specified limits of VOC content. Records from before November 15, 2003 must still be retained on-site for five years from date of record, 3.) Volume of each cleaning solvent used (gallons), and 4.) The type of cleaning activity for each solvent that is being used in accordance with the applicable cleaning category specified in Section 5.4, Table 5 of Rule 4604 (9/20/07). [District Rule 4604]
43. The permittee shall keep daily records of key operating parameters, that is, differential pressures of the booth and PTE and RTO combustion chamber temperature. [District Rules 2201 and 4604]

CONDITIONS CONTINUE ON NEXT PAGE

44. The records showing violation of key operating parameters, that is, differential pressures for the booth and PTE and RTO combustion chamber temperature shall be reported to the District within 96 hours following the occurrence. Such records include an explanation of the cause of the violation and corrective action taken. [District Rule 2201 and 4604]
45. The permittee shall develop and submit Operation and Maintenance (O/M) Plan for the VOC emission control system prior to the implementation of this permit. This O/M plan shall be developed consistent with section 6.5.3 of Rule 4604 (9/20/07). [District Rule 4604]
46. The O/M Plan shall not be implemented prior to approval in writing by the District. [District Rule 4604]
47. The O/M Plan shall be updated prior to any planned change in operation of the VOC emission control system. The operator may request a change to the O/M Plan at any time. If the O/M Plan undergoes significant changes to one or more O/M Plan elements, an operator must notify the District no later than 7 days after the change, and must submit an updated O/M Plan to the District for approval no later than 14 days after the change. [District Rule 4604]
48. An O/M Plan is not required for an inactive VOC emission control system until 180 days before start-up. A period of shorter than 180 days may be allowed if it can be shown that the equipment will be started up sooner than expected. [District Rule 4604]
49. The operator shall retain all records for a minimum of five years, make the records available on site during normal business hours to the APCO, ARB, or EPA, and submit the records to the APCO, ARB, or EPA upon request. [District Rules 2201 and 4604]



COPY

AUTHORITY TO CONSTRUCT

PERMIT NO: N-1330-3-2

ISSUANCE DATE: 12/03/2012

LEGAL OWNER OR OPERATOR: GREIF INDUSTRIAL PACKAGING & SERVS LLC
MAILING ADDRESS: P O BOX 2146
MERCED, CA 95344

LOCATION: 2400 COOPER AVE
MERCED, CA 95344

EQUIPMENT DESCRIPTION:

MODIFICATION OF CAN AND COIL COATING OPERATION CONSISTING OF A BINKS EXTERIOR BODY BOOTH; INSTALL A REGENERATIVE THERMAL OXIDIZER (RTO) THAT WILL SERVE PERMIT UNITS N-1330-2, '-3, '-4, '-5, '-6, AND '-7; INSTALL PERMANENT TOTAL ENCLOSURES AROUND SPRAY PAINT BOOTH N-1330-2, '-3, '-4, '-5 AND '-6; ESTABLISH FACILITY-WIDE VOC LIMIT OF 19,999 POUNDS PER YEAR. THE POST-PROJECT EQUIPMENT DESCRIPTION WILL BE: CAN AND COIL COATING OPERATION #2 : BINKS EXTERIOR BODY BOOTH IN A PERMANENT TOTAL ENCLOSURE (PTE); AND A 3.9 MMBTU/HR DIRECT-FIRED NATURAL GAS BLUE SURF PAINT CURING OVEN SHARED BY PERMITS N-1330-3 AND '-6. THE BOOTH ENCLOSURE AND THE CURING OVEN ARE VENTED TO A COMMON 4.6 MMBTU/HR NATURAL GAS-FIRED REGENERATIVE THERMAL OXIDIZER (RTO) SHARED AMONG PERMITS N-1330-2, '-3, '-4, '-5, '-6 AND '-7

CONDITIONS

1. Upon implementation of Authorities to Construct N-1330-2-3, '-3-2, '-4-2, '-5-2, '-6-3, '-7-6 and '-15-3, the facility will no longer be a Major Source for NOx, VOC, and Greenhouse Gas (GHG) emissions, and the facility may submit a Title V Minor Modification permit application to remove the Title V status. [District Rule 2520]
2. Upon implementation of Authorities to Construct N-1330-2-3, '-3-2, '-4-2, '-5-2, '-6-3, '-7-6 and '-15-3, Permits to Operate N-1330-8, '-9 and '-10 shall be cancelled. [District Rule 2201]
3. VOC emissions from the entire stationary source shall not exceed 19,999 pounds in any 12 consecutive month rolling period. The permittee shall maintain monthly records of VOC emissions to demonstrate compliance with this condition. [District Rule 2201]
4. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
5. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]

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 Sadreddin, Executive Director / APCO

DAVID WARNER, Director of Permit Services
N-1330-3-2 Dec 3 2012 10:02 AM - KAHLOLU Joint Inspection NOT Required

6. 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]
7. Exhaust fans shall be switched on prior to the start of paint spraying operations. [District Rule 2201]
8. All filters shall be properly maintained and must be in place during the painting operation. [District Rule 2201]
9. Emissions from the coating operation (paint and solvent use) shall not exceed any of following limits: 63.1 lb-VOC/day and 11.1 lb-PM10/day. [District Rule 2201]
10. VOC emissions shall be estimated as follows: $\text{VOC (lb/day, lb/yr)} = (\text{Volume of coatings used (gal/day, gal/yr)} \times \text{material VOC content (lb-VOC/gal)} + \text{solvent use inside enclosure(s) vented to VOC control system (gal/day, gal/yr)} \times \text{VOC content (lb/gal)}) \times (1 - \text{overall capture and control efficiency (\%)}) + \text{solvent use outside enclosure(s) not vented to VOC control system (gal/day, gal/yr)} \times \text{VOC content (lb/gal)}$. [District Rule 2201]
11. PM10 emissions shall be estimated as follows: $\text{PM10 (lb/day, lb/yr)} = \text{Volume of coating used (gal/day, gal/yr)} \times \text{solids content (by weight)} \times \text{coating density (lb/gallon)} \times F \times (1 - \text{TE}) \times (1 - \text{CE})$, where F is the fraction (%) of the solids 10 micron or less, if not available, F can be set equal to 1; TE is the coating transfer efficiency of the application equipment, for HVLP/electrostatic use 80%, and for brush, dip, or roll coating application equipment use 100%, and CE is the booth filter control efficiency for PM10. [District Rule 2201]
12. Emissions from natural gas combustion in the curing oven shall not exceed any of the following limits: 0.1 lb-NOx/MMBtu, 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 0.084 lb-CO/MMBtu, and 0.0055 lb-VOC/MMBtu. [District Rule 2201]
13. The combined VOC emissions from permit units N-1330-2, '-3, '-4, '-5, '-6 and '-7 including natural gas combustion in the RTO shall not exceed 216.7 pounds in any one day. [District Rule 2201]
14. Emissions from natural gas combustion in the RTO shall not exceed any of the following limits: 0.036 lb-NOx/MMBtu, 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 0.295 lb-CO/MMBtu, and 0.0055 lb-VOC/MMBtu. [District Rule 2201]
15. The VOC emission control system shall have an overall capture and control efficiency of at least 90 percent by weight. [District Rule 2201]
16. The permittee shall establish a maximum differential pressure across the spray booth exhaust filters and a minimum pressure differential across the PTE while demonstrating compliance with the overall capture and control efficiency. These differential pressures shall be included in the Permit to Operate. [District Rule 2201]
17. The permittee shall install permanent device(s) to continuously measure the differential pressure across the spray booth exhaust filter and the PTE under this permit to demonstrate on-going compliance with the overall capture and control efficiency. The measured differential readings shall be compared with the values established in this permit to detect and correct any problems with filter media, exhaust fans, enclosures or other similar apparatus in the system. [District Rule 2201]
18. The RTO shall be in operation, at or above the minimum operating chamber temperature being established during the initial source test, when any coating process operates. [District Rule 2201]
19. The RTO chambers shall be permanently equipped with temperature measurement devices such as thermocouples. The combustion temperature shall be continuously monitored and recorded whenever any coating process operates. [District Rule 2201]
20. The minimum temperature in the RTO combustion chamber (°F) shall be established during the initial source test while achieving the required overall capture and control efficiency. This temperature measurement shall be listed in the Permit to Operate. [District Rule 2201]
21. Sampling facilities for source testing shall be provided in accordance with the provisions of Rule 1081 (Source Sampling). [District Rule 1081]
22. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081]

CONDITIONS CONTINUE ON NEXT PAGE

23. Source testing to determine VOC capture efficiency of the enclosure set-up (booth and PTE) under this permit shall be conducted within 60 days of startup under this permit. [District Rule 2201]
24. Source testing to determine RTO control efficiency for VOC shall be conducted within 60 days of startup under this permit and at least once every 12 months thereafter. [District Rule 2201]
25. All emissions measurements shall be made with the units operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-lighting of the unit resulting from an unscheduled or unavoidable shut off of the fuel flow or electrical power to the unit. [District Rule 2201]
26. For source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rule 2201]
27. VOC capture efficiency shall be determined according to EPA's "Guidelines for Determining Capture Efficiency," January 9, 1995 and 40 CFR 51, Appendix M, Methods 204-204F, as applicable, or any other method approved by EPA, ARB and the District. [District Rules 2201 and 4604]
28. The RTO control efficiency shall be determined using EPA Methods 2, 2A, or 2D for measuring flow rates and EPA Methods 25, 25A, or 25B for measuring total gaseous organic concentrations at the inlet and outlet of the control device. EPA Method 18 or ARB Method 422 shall be used to determine the emissions of exempt compounds. Should the permittee decide to use a different test methodology, the methodology must first be approved by the District. [District Rules 2201 and 4604]
29. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081]
30. VOC content of solvents used shall not exceed 25 g/l (0.21 lb/gal) for product cleaning during manufacturing process or surface preparation for coating application, or repair and maintenance cleaning, or cleaning of coating application equipment, unless such cleaning operations are carried out within the control that meet the requirements of section 5.2 of Rule 4604 (9/20/07). [District Rule 4604]
31. VOC content of coatings as applied, excluding water and exempt compounds, used for drums and lids coating operations, shall not exceed any of the following limits, unless such coating operations are carried out within the control system that meet the requirements of section 5.2 of Rule 4604 (9/20/07) provided in the condition below: sheet base coating (interior or exterior) 225 g/l (1.875 lb/gallon) using any application method, interior body spray: 420 g/l (3.5 lb/gallon) for new and 510 g/l (4.25 lb/gallon) for reconditioned using spray application method, exterior body spray: 340 g/l (2.83 lb/gallon) for new and 420 g/l (3.5 lb/gallon) for reconditioned using spray application method, overvarnish (interior or exterior) 225 g/l (1.875 lb/gallon) using any application method, interior end coating: 420 g/l (3.5 lb/gallon) for new and 510 g/l (4.25 lb/gallon) for reconditioned using spray or roll coat application method, exterior end coating: 340 g/l (2.83 lb/gallon) for new and 420 g/l (3.5 lb/gallon) for reconditioned using spray or roll coat application method, side seam coating 660 g/l (5.5 lb/gallon) using spray application method, and end seal compound 60 g/l (0.5 lb/gallon) using any application method. [District Rule 4604]
32. The use of coatings and solvents with VOC content in excess of the applicable limits (mentioned in the above condition) shall be allowed, provided that each of the following are met: 1.) The VOC emission control system shall have an overall capture and control efficiency of at least 90% on weight basis during emission producing activities, 2.) The VOC emission control system reduce VOC emissions, at all times, to a level that is not greater than the emission level which would have been achieved through the use of materials compliant with the applicable requirements of Section 5.1 and Section 5.4 of Rule 4604 (9/20/07) during emission producing activities, 3.) The operator shall monitor key system operating parameters of VOC emission control system (i.e. differential pressures established for booth and PTE to ensure proper capture, and established minimum RTO chamber temperature), 4.) The operator shall implement an Operation and Maintenance (O/M) Plan pursuant to Section 6.5 of Rule 4604 (9/20/07) with 10 days of approval of the plan, 5.) The operator shall perform source test at least once every 12 months to determine control efficiency of the control system (RTO system) using non-compliant coating and under the conditions specified in the Permit to Operate. [District Rule 4604]

CONDITIONS CONTINUE ON NEXT PAGE

33. All fresh or spent solvents, waste solvent cleaning materials such as cloth, paper etc., coatings, adhesives, catalysts, thinners and solvents shall be stored in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4604]
34. Coatings shall be applied with properly operating coating equipment. [District Rule 4604]
35. The coating application equipment is operated according to operating procedures specified by the equipment manufacturer. [District Rule 4604]
36. Only electrostatic application, flow coater, roll coater, dip coater, hand application methods, HVLP spray, or any other application method that demonstrates to the District and EPA, a coating transfer efficiency of at least 65% as measured using a test method per section 6.7.4 of Rule 4604 (9/20/07) shall be used under this permit. In lieu of complying with this requirement, the operator may control emissions from application equipment with the VOC emission control system that meet the requirements of section 5.2 of Rule 4604 (9/20/07). [District Rule 4604]
37. For HVLP spray guns manufactured prior to January 1, 1996, the end user shall demonstrate that the gun meets HVLP spray equipment standards. Satisfactory proof will be either in the form of a manufacturer's published technical material or by a demonstration using a certified air pressure tip gauge, measuring the air atomizing pressure dynamically at the center of the air cap and at the air horns. [District Rule 4604]
38. The operator shall maintain and have available on site, a current list of coatings in use which provides all of the coating data necessary to evaluate compliance including the following information, as applicable: 1.) Specific manufacturer's name of coatings, catalysts and thinners used, 2.) Mix ratio of components used, and 3.) VOC content of each coating, as applied in g/l or lb/gal. [District Rule 4604]
39. The operator shall maintain daily records of the following items: 1.) Specific coating used and mix ratio of components added to the coating material prior to application, 2.) Volume of coatings applied (gallons), 3.) Specific solvents, catalysts and thinners used, and 4) Volume of each solvent, catalyst and thinner (gallons). [District Rule 4604]
40. The operator shall maintain and have available on site, a current list of cleaning solvents in use that provides all of the data necessary to evaluate compliance including the following information, as applicable: 1.) The name of the cleaning solvent and its manufacturer's name, and 2.) VOC content of the solvent expressed in g/l or lb/gal, as applied. [District Rule 4604]
41. The operator shall maintain daily records of the following items: 1.) Name of cleaning solvents used, 2.) When the solvent is a mixture of different materials that are blended by the operator, the mix ratio of the batch shall be recorded and the VOC content of the batch shall be calculated and recorded in order to determine compliance with the specified limits of VOC content. Records from before November 15, 2003 must still be retained on-site for five years from date of record, 3.) Volume of each cleaning solvent used (gallons), and 4.) The type of cleaning activity for each solvent that is being used in accordance with the applicable cleaning category specified in Section 5.4, Table 5 of Rule 4604 (9/20/07). [District Rule 4604]
42. The permittee shall keep daily records of key operating parameters, that is, differential pressures of the booth and PTE and RTO combustion chamber temperature. [District Rules 2201 and 4604]
43. The records showing violation of key operating parameters, that is, differential pressures for the booth and PTE and RTO combustion chamber temperature shall be reported to the District within 96 hours following the occurrence. Such records include an explanation of the cause of the violation and corrective action taken. [District Rule 2201 and 4604]
44. The permittee shall develop and submit Operation and Maintenance (O/M) Plan for the VOC emission control system prior to the implementation of this permit. This O/M plan shall be developed consistent with section 6.5.3 of Rule 4604 (9/20/07). [District Rule 4604]
45. The O/M Plan shall not be implemented prior to approval in writing by the District. [District Rule 4604]
46. The O/M Plan shall be updated prior to any planned change in operation of the VOC emission control system. The operator may request a change to the O/M Plan at any time. If the O/M Plan undergoes significant changes to one or more O/M Plan elements, an operator must notify the District no later than 7 days after the change, and must submit an updated O/M Plan to the District for approval no later than 14 days after the change. [District Rule 4604]

47. An O/M Plan is not required for an inactive VOC emission control system until 180 days before start-up. A period of shorter than 180 days may be allowed if it can be shown that the equipment will be started up sooner than expected. [District Rule 4604]
48. The operator shall retain all records for a minimum of five years, make the records available on site during normal business hours to the APCO, ARB, or EPA, and submit the records to the APCO, ARB, or EPA upon request. [District Rules 2201 and 4604]



COPY

AUTHORITY TO CONSTRUCT

PERMIT NO: N-1330-4-2

ISSUANCE DATE: 12/03/2012

LEGAL OWNER OR OPERATOR: GREIF INDUSTRIAL PACKAGING & SERVS LLC
MAILING ADDRESS: P O BOX 2146
MERCED, CA 95344

LOCATION: 2400 COOPER AVE
MERCED, CA 95344

EQUIPMENT DESCRIPTION:

MODIFICATION OF CAN AND COIL COATING OPERATION CONSISTING OF CENTRIFUGAL COATER (#2) AND RHEEM DESIGN BOOTH; INSTALL A REGENERATIVE THERMAL OXIDIZER (RTO) THAT WILL SERVE PERMIT UNITS N-1330-2, '-3, '-4, '-5, '-6, AND '-7; INSTALL PERMANENT TOTAL ENCLOSURES AROUND SPRAY PAINT BOOTH N-1330-2, '-3, '-4, '-5 AND '-6; ESTABLISH FACILITY-WIDE VOC LIMIT OF 19,999 POUNDS PER YEAR. THE POST-PROJECT EQUIPMENT DESCRIPTION WILL BE: CAN AND COIL COATING OPERATION #3: CENTRIFUGAL COATER (#2) AND RHEEM DESIGN BOOTH IN A PERMANENT TOTAL ENCLOSURE (PTE); AND A 4.9 MMBTU/HR (DE-RATED) SHELL PAINT CURING OVEN SHARED BY PERMITS N-1330-4 AND 5. THE BOOTH ENCLOSURE AND THE CURING OVEN ARE VENTED TO A 4.6 MMBTU/HR NATURAL GAS-FIRED REGENERATIVE THERMAL OXIDIZER (RTO) SHARED AMONG PERMITS N-1330-2, '-3, '-4, '-5, '-6 AND '-7

CONDITIONS

1. Upon implementation of Authorities to Construct N-1330-2-3, '-3-2, '-4-2, '-5-2, '-6-3, '-7-6 and '-15-3, the facility will no longer be a Major Source for NOx, VOC, and Greenhouse Gas (GHG) emissions, and the facility may submit a Title V Minor Modification permit application to remove the Title V status. [District Rule 2520]
2. Upon implementation of Authorities to Construct N-1330-2-3, '-3-2, '-4-2, '-5-2, '-6-3, '-7-6 and '-15-3, Permits to Operate N-1330-8, '-9 and '-10 shall be cancelled. [District Rule 2201]
3. VOC emissions from the entire stationary source shall not exceed 19,999 pounds in any 12 consecutive month rolling period. The permittee shall maintain monthly records of VOC emissions to demonstrate compliance with this condition. [District Rule 2201]
4. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
5. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]

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-1330-4-2 Dec 3 2012 10:00 AM - KAH/LONJ Joint Inspection NOT Required

6. 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]
7. Exhaust fans shall be switched on prior to the start of paint spraying operations. [District Rule 2201]
8. All filters shall be properly maintained and must be in place during the painting operation. [District Rule 2201]
9. Emissions from the coating operation (paint and solvent use) shall not exceed any of following limits: 18.7 lb-VOC/day and 1.6 lb-PM10/day. [District Rule 2201]
10. VOC emissions shall be estimated as follows: $\text{VOC (lb/day, lb/yr)} = (\text{Volume of coatings used (gal/day, gal/yr)} \times \text{material VOC content (lb-VOC/gal)} + \text{solvent use inside enclosure(s) vented to VOC control system (gal/day, gal/yr)} \times \text{VOC content (lb/gal)}) \times (1 - \text{overall capture and control efficiency (\%)}) + \text{solvent use outside enclosure(s) not vented to VOC control system (gal/day, gal/yr)} \times \text{VOC content (lb/gal)}$. [District Rule 2201]
11. PM10 emissions shall be estimated as follows: $\text{PM10 (lb/day, lb/yr)} = \text{Volume of coating used (gal/day, gal/yr)} \times \text{solids content (by weight)} \times \text{coating density (lb/gallon)} \times F \times (1 - \text{TE}) \times (1 - \text{CE})$, where F is the fraction (%) of the solids 10 micron or less, if not available, F can be set equal to 1; TE is the coating transfer efficiency of the application equipment, for HVLP/electrostatic use 80%, and for brush, dip, or roll coating application equipment use 100%, and CE is the booth filter control efficiency for PM10. [District Rule 2201]
12. The operator shall hire a third party contractor to de-rate the curing oven using a fuel restricting orifice (or equivalent permanent devices) such that the rated heat input shall not exceed 4.9 MMBtu/hr. The permittee shall keep all records including but not limited to scope of work, date of work performed, bill of materials purchased/replaced, new heat input rate, name of the personnel performing the work and company affiliation. [District Rules 2201 and 4309]
13. Emissions from natural gas combustion in the curing oven shall not exceed any of the following limits: 0.1 lb-NOx/MMBtu, 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 0.084 lb-CO/MMBtu, and 0.0055 lb-VOC/MMBtu. [District Rule 2201]
14. The combined VOC emissions from permit units N-1330-2, '-3, '-4, '-5, '-6 and '-7 including natural gas combustion in the RTO shall not exceed 216.7 pounds in any one day. [District Rule 2201]
15. Emissions from natural gas combustion in the RTO shall not exceed any of the following limits: 0.036 lb-NOx/MMBtu, 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 0.295 lb-CO/MMBtu, and 0.0055 lb-VOC/MMBtu. [District Rule 2201]
16. The VOC emission control system shall have an overall capture and control efficiency of at least 90 percent by weight. [District Rule 2201]
17. The permittee shall establish a maximum differential pressure across the spray booth exhaust filters and a minimum pressure differential across the PTE while demonstrating compliance with the overall capture and control efficiency. These differential pressures shall be included in the Permit to Operate. [District Rule 2201]
18. The permittee shall install permanent device(s) to continuously measure the differential pressure across the spray booth exhaust filter and the PTE under this permit to demonstrate on-going compliance with the overall capture and control efficiency. The measured differential readings shall be compared with the values established in this permit to detect and correct any problems with filter media, exhaust fans, enclosures or other similar apparatus in the system. [District Rule 2201]
19. The RTO shall be in operation, at or above the minimum operating chamber temperature being established during the initial source test, when any coating process operates. [District Rule 2201]
20. The RTO chambers shall be permanently equipped with temperature measurement devices such as thermocouples. The combustion temperature shall be continuously monitored and recorded whenever any coating process operates. [District Rule 2201]
21. The minimum temperature in the RTO combustion chamber (°F) shall be established during the initial source test while achieving the required overall capture and control efficiency. This temperature measurement shall be listed in the Permit to Operate. [District Rule 2201]
22. Sampling facilities for source testing shall be provided in accordance with the provisions of Rule 1081 (Source Sampling). [District Rule 1081]

CONDITIONS CONTINUE ON NEXT PAGE

23. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081]
24. Source testing to determine VOC capture efficiency of the enclosure set-up (booth and PTE) under this permit shall be conducted within 60 days of startup under this permit. [District Rule 2201]
25. Source testing to determine RTO control efficiency for VOC shall be conducted within 60 days of startup under this permit and at least once every 12 months thereafter. [District Rule 2201]
26. All emissions measurements shall be made with the units operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-lighting of the unit resulting from an unscheduled or unavoidable shut off of the fuel flow or electrical power to the unit. [District Rule 2201]
27. For source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rule 2201]
28. VOC capture efficiency shall be determined according to EPA's "Guidelines for Determining Capture Efficiency," January 9, 1995 and 40 CFR 51, Appendix M, Methods 204-204F, as applicable, or any other method approved by EPA, ARB and the District. [District Rules 2201 and 4604]
29. The RTO control efficiency shall be determined using EPA Methods 2, 2A, or 2D for measuring flow rates and EPA Methods 25, 25A, or 25B for measuring total gaseous organic concentrations at the inlet and outlet of the control device. EPA Method 18 or ARB Method 422 shall be used to determine the emissions of exempt compounds. Should the permittee decide to use a different test methodology, the methodology must first be approved by the District. [District Rules 2201 and 4604]
30. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081]
31. VOC content of solvents used shall not exceed 25 g/l (0.21 lb/gal) for product cleaning during manufacturing process or surface preparation for coating application, or repair and maintenance cleaning, or cleaning of coating application equipment, unless such cleaning operations are carried out within the control that meet the requirements of section 5.2 of Rule 4604 (9/20/07). [District Rule 4604]
32. VOC content of coatings as applied, excluding water and exempt compounds, used for drums and lids coating operations, shall not exceed any of the following limits, unless such coating operations are carried out within the control system that meet the requirements of section 5.2 of Rule 4604 (9/20/07) provided in the condition below: sheet base coating (interior or exterior) 225g/l (1.875 lb/gallon) using any application method, interior body spray: 420 g/l (3.5 lb/gallon) for new and 510 g/l (4.25 lb/gallon) for reconditioned using spray application method, exterior body spray: 340 g/l (2.83 lb/gallon) for new and 420 g/l (3.5 lb/gallon) for reconditioned using spray application method, overvarnish (interior or exterior) 225 g/l (1.875 lb/gallon) using any application method, interior end coating: 420 g/l (3.5 lb/gallon) for new and 510 g/l (4.25 lb/gallon) for reconditioned using spray or roll coat application method, exterior end coating: 340 g/l (2.83 lb/gallon) for new and 420 g/l (3.5 lb/gallon) for reconditioned using spray or roll coat application method, side seam coating 660 g/l (5.5 lb/gallon) using spray application method, and end seal compound 60 g/l (0.5 lb/gallon) using any application method. [District Rule 4604]

33. The use of coatings and solvents with VOC content in excess of the applicable limits (mentioned in the above condition) shall be allowed, provided that each of the following are met: 1.) The VOC emission control system shall have an overall capture and control efficiency of at least 90% on weight basis during emission producing activities, 2.) The VOC emission control system reduce VOC emissions, at all times, to a level that is not greater than the emission level which would have been achieved through the use of materials compliant with the applicable requirements of Section 5.1 and Section 5.4 of Rule 4604 (9/20/07) during emission producing activities, 3.) The operator shall monitor key system operating parameters of VOC emission control system (i.e. differential pressures established for booth and PTE to ensure proper capture, and established minimum RTO chamber temperature), 4.) The operator shall implement an Operation and Maintenance (O/M) Plan pursuant to Section 6.5 of Rule 4604 (9/20/07) with 10 days of approval of the plan, 5.) The operator shall perform source test at least once every 12 months to determine control efficiency of the control system (RTO system) using non-compliant coating and under the conditions specified in the Permit to Operate. [District Rule 4604]
34. All fresh or spent solvents, waste solvent cleaning materials such as cloth, paper etc., coatings, adhesives, catalysts, thinners and solvents shall be stored in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4604]
35. Coatings shall be applied with properly operating coating equipment. [District Rule 4604]
36. The coating application equipment is operated according to operating procedures specified by the equipment manufacturer. [District Rule 4604]
37. Only electrostatic application, flow coater, roll coater, dip coater, hand application methods, HVLP spray, or any other application method that demonstrates to the District and EPA, a coating transfer efficiency of at least 65% as measured using a test method per section 6.7.4 of Rule 4604 (9/20/07) shall be used under this permit. In lieu of complying with this requirement, the operator may control emissions from application equipment with the VOC emission control system that meet the requirements of section 5.2 of Rule 4604 (9/20/07). [District Rule 4604]
38. For HVLP spray guns manufactured prior to January 1, 1996, the end user shall demonstrate that the gun meets HVLP spray equipment standards. Satisfactory proof will be either in the form of a manufacturer's published technical material or by a demonstration using a certified air pressure tip gauge, measuring the air atomizing pressure dynamically at the center of the air cap and at the air horns. [District Rule 4604]
39. The operator shall maintain and have available on site, a current list of coatings in use which provides all of the coating data necessary to evaluate compliance including the following information, as applicable: 1.) Specific manufacturer's name of coatings, catalysts and thinners used, 2.) Mix ratio of components used, and 3.) VOC content of each coating, as applied in g/l or lb/gal. [District Rule 4604]
40. The operator shall maintain daily records of the following items: 1.) Specific coating used and mix ratio of components added to the coating material prior to application, 2.) Volume of coatings applied (gallons), 3.) Specific solvents, catalysts and thinners used, and 4) Volume of each solvent, catalyst and thinner (gallons). [District Rule 4604]
41. The operator shall maintain and have available on site, a current list of cleaning solvents in use that provides all of the data necessary to evaluate compliance including the following information, as applicable: 1.) The name of the cleaning solvent and its manufacturer's name, and 2.) VOC content of the solvent expressed in g/l or lb/gal, as applied. [District Rule 4604]
42. The operator shall maintain daily records of the following items: 1.) Name of cleaning solvents used, 2.) When the solvent is a mixture of different materials that are blended by the operator, the mix ratio of the batch shall be recorded and the VOC content of the batch shall be calculated and recorded in order to determine compliance with the specified limits of VOC content. Records from before November 15, 2003 must still be retained on-site for five years from date of record, 3.) Volume of each cleaning solvent used (gallons), and 4.) The type of cleaning activity for each solvent that is being used in accordance with the applicable cleaning category specified in Section 5.4, Table 5 of Rule 4604 (9/20/07). [District Rule 4604]
43. The permittee shall keep daily records of key operating parameters, that is, differential pressures of the booth and PTE and RTO combustion chamber temperature. [District Rules 2201 and 4604]

CONDITIONS CONTINUE ON NEXT PAGE

44. The records showing violation of key operating parameters, that is, differential pressures for the booth and PTE and RTO combustion chamber temperature shall be reported to the District within 96 hours following the occurrence. Such records include an explanation of the cause of the violation and corrective action taken. [District Rule 2201 and 4604]
45. The permittee shall develop and submit Operation and Maintenance (O/M) Plan for the VOC emission control system prior to the implementation of this permit. This O/M plan shall be developed consistent with section 6.5.3 of Rule 4604 (9/20/07). [District Rule 4604]
46. The O/M Plan shall not be implemented prior to approval in writing by the District. [District Rule 4604]
47. The O/M Plan shall be updated prior to any planned change in operation of the VOC emission control system. The operator may request a change to the O/M Plan at any time. If the O/M Plan undergoes significant changes to one or more O/M Plan elements, an operator must notify the District no later than 7 days after the change, and must submit an updated O/M Plan to the District for approval no later than 14 days after the change. [District Rule 4604]
48. An O/M Plan is not required for an inactive VOC emission control system until 180 days before start-up. A period of shorter than 180 days may be allowed if it can be shown that the equipment will be started up sooner than expected. [District Rule 4604]
49. The operator shall retain all records for a minimum of five years, make the records available on site during normal business hours to the APCO, ARB, or EPA, and submit the records to the APCO, ARB, or EPA upon request. [District Rules 2201 and 4604]



COPY

AUTHORITY TO CONSTRUCT

PERMIT NO: N-1330-5-2

ISSUANCE DATE: 12/03/2012

LEGAL OWNER OR OPERATOR: GREIF INDUSTRIAL PACKAGING & SERVS LLC
MAILING ADDRESS: P O BOX 2146
MERCED, CA 95344

LOCATION: 2400 COOPER AVE
MERCED, CA 95344

EQUIPMENT DESCRIPTION:

MODIFICATION OF CAN AND COIL COATING OPERATION CONSISTING OF CENTRIFUGAL COATER (#1): INSTALL A REGENERATIVE THERMAL OXIDIZER (RTO) THAT WILL SERVE PERMIT UNITS N-1330-2, '-3, '-4, '-5, '-6, AND '-7; INSTALL PERMANENT TOTAL ENCLOSURES AROUND SPRAY PAINT BOOTH N-1330-2, '-3, '-4, '-5 AND '-6; ESTABLISH FACILITY-WIDE VOC LIMIT OF 19,999 POUNDS PER YEAR. THE POST-PROJECT EQUIPMENT DESCRIPTION WILL BE: CAN AND COIL COATING OPERATION #4: CENTRIFUGAL COATER (#1) IN A PERMANENT TOTAL ENCLOSURE (PTE); AND A 4.9 MMBTU/HR (DE-RATED) SHELL PAINT CURING OVEN SHARED BY PERMITS N-1330-4 AND 5. THE BOOTH ENCLOSURE AND THE CURING OVEN ARE VENTED TO A 4.6 MMBTU/HR NATURAL GAS-FIRED REGENERATIVE THERMAL OXIDIZER (RTO) SHARED AMONG PERMITS N-1330-2, '-3, '-4, '-5, '-6 AND '-7

CONDITIONS

1. Upon implementation of Authorities to Construct N-1330-2-3, '-3-2, '-4-2, '-5-2, '-6-3, '-7-6 and '-15-3, the facility will no longer be a Major Source for NOx, VOC, and Greenhouse Gas (GHG) emissions, and the facility may submit a Title V Minor Modification permit application to remove the Title V status. [District Rule 2520]
2. Upon implementation of Authorities to Construct N-1330-2-3, '-3-2, '-4-2, '-5-2, '-6-3, '-7-6 and '-15-3, Permits to Operate N-1330-8, '-9 and '-10 shall be cancelled. [District Rule 2201]
3. VOC emissions from the entire stationary source shall not exceed 19,999 pounds in any 12 consecutive month rolling period. The permittee shall maintain monthly records of VOC emissions to demonstrate compliance with this condition. [District Rule 2201]
4. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
5. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
6. 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]

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 Sadreddin, Executive Director / APCO

DAVID WARNER, Director of Permit Services
N-1330-5-2 Dec 3 2012 10:02AM - KAHLO Joint Inspection NOT Required

7. Exhaust fans shall be switched on prior to the start of paint spraying operations. [District Rule 2201]
8. All filters shall be properly maintained and must be in place during the painting operation. [District Rule 2201]
9. Emissions from the coating operation (paint and solvent use) shall not exceed any of following limits: 18.7 lb-VOC/day and 1.6 lb-PM10/day. [District Rule 2201]
10. VOC emissions shall be estimated as follows: $\text{VOC (lb/day, lb/yr)} = (\text{Volume of coatings used (gal/day, gal/yr)} \times \text{material VOC content (lb-VOC/gal)} + \text{solvent use inside enclosure(s) vented to VOC control system (gal/day, gal/yr)} \times \text{VOC content (lb/gal)}) \times (1 - \text{overall capture and control efficiency (\%)}) + \text{solvent use outside enclosure(s) not vented to VOC control system (gal/day, gal/yr)} \times \text{VOC content (lb/gal)}$. [District Rule 2201]
11. PM10 emissions shall be estimated as follows: $\text{PM10 (lb/day, lb/yr)} = \text{Volume of coating used (gal/day, gal/yr)} \times \text{solids content (by weight)} \times \text{coating density (lb/gallon)} \times F \times (1 - \text{TE}) \times (1 - \text{CE})$, where F is the fraction (%) of the solids 10 micron or less, if not available, F can be set equal to 1; TE is the coating transfer efficiency of the application equipment, for HVLP/electrostatic use 80%, and for brush, dip, or roll coating application equipment use 100%, and CE is the booth filter control efficiency for PM10. [District Rule 2201]
12. The operator shall hire a third party contractor to de-rate the curing oven using a fuel restricting orifice (or equivalent permanent devices) such that the rated heat input shall not exceed 4.9 MMBtu/hr. The permittee shall keep all records including but not limited to scope of work, date of work performed, bill of materials purchased/replaced, new heat input rate, name of the personnel performing the work and company affiliation. [District Rules 2201 and 4309]
13. Emissions from natural gas combustion in the curing oven shall not exceed any of the following limits: 0.1 lb-NOx/MMBtu, 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 0.084 lb-CO/MMBtu, and 0.0055 lb-VOC/MMBtu. [District Rule 2201]
14. The combined VOC emissions from permit units N-1330-2, '-3, '-4, '-5, '-6 and '-7 including natural gas combustion in the RTO shall not exceed 216.7 pounds in any one day. [District Rule 2201]
15. Emissions from natural gas combustion in the RTO shall not exceed any of the following limits: 0.036 lb-NOx/MMBtu, 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 0.295 lb-CO/MMBtu, and 0.0055 lb-VOC/MMBtu. [District Rule 2201]
16. The VOC emission control system shall have an overall capture and control efficiency of at least 90 percent by weight. [District Rule 2201]
17. The permittee shall establish a maximum differential pressure across the spray booth exhaust filters and a minimum pressure differential across the PTE while demonstrating compliance with the overall capture and control efficiency. These differential pressures shall be included in the Permit to Operate. [District Rule 2201]
18. The permittee shall install permanent device(s) to continuously measure the differential pressure across the spray booth exhaust filter and the PTE under this permit to demonstrate on-going compliance with the overall capture and control efficiency. The measured differential readings shall be compared with the values established in this permit to detect and correct any problems with filter media, exhaust fans, enclosures or other similar apparatus in the system. [District Rule 2201]
19. The RTO shall be in operation, at or above the minimum operating chamber temperature being established during the initial source test, when any coating process operates. [District Rule 2201]
20. The RTO chambers shall be permanently equipped with temperature measurement devices such as thermocouples. The combustion temperature shall be continuously monitored and recorded whenever any coating process operates. [District Rule 2201]
21. The minimum temperature in the RTO combustion chamber (°F) shall be established during the initial source test while achieving the required overall capture and control efficiency. This temperature measurement shall be listed in the Permit to Operate. [District Rule 2201]
22. Sampling facilities for source testing shall be provided in accordance with the provisions of Rule 1081 (Source Sampling). [District Rule 1081]

CONDITIONS CONTINUE ON NEXT PAGE

23. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081]
24. Source testing to determine VOC capture efficiency of the enclosure set-up (booth and PTE) under this permit shall be conducted within 60 days of startup under this permit. [District Rule 2201]
25. Source testing to determine RTO control efficiency for VOC shall be conducted within 60 days of startup under this permit and at least once every 12 months thereafter. [District Rule 2201]
26. All emissions measurements shall be made with the units operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-lighting of the unit resulting from an unscheduled or unavoidable shut off of the fuel flow or electrical power to the unit. [District Rule 2201]
27. For source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rule 2201]
28. VOC capture efficiency shall be determined according to EPA's "Guidelines for Determining Capture Efficiency," January 9, 1995 and 40 CFR 51, Appendix M, Methods 204-204F, as applicable, or any other method approved by EPA, ARB and the District. [District Rules 2201 and 4604]
29. The RTO control efficiency shall be determined using EPA Methods 2, 2A, or 2D for measuring flow rates and EPA Methods 25, 25A, or 25B for measuring total gaseous organic concentrations at the inlet and outlet of the control device. EPA Method 18 or ARB Method 422 shall be used to determine the emissions of exempt compounds. Should the permittee decide to use a different test methodology, the methodology must first be approved by the District. [District Rules 2201 and 4604]
30. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081]
31. VOC content of solvents used shall not exceed 25 g/l (0.21 lb/gal) for product cleaning during manufacturing process or surface preparation for coating application, or repair and maintenance cleaning, or cleaning of coating application equipment, unless such cleaning operations are carried out within the control that meet the requirements of section 5.2 of Rule 4604 (9/20/07). [District Rule 4604]
32. VOC content of coatings as applied, excluding water and exempt compounds, used for drums and lids coating operations, shall not exceed any of the following limits, unless such coating operations are carried out within the control system that meet the requirements of section 5.2 of Rule 4604 (9/20/07) provided in the condition below: sheet base coating (interior or exterior) 225 g/l (1.875 lb/gallon) using any application method, interior body spray: 420 g/l (3.5 lb/gallon) for new and 510 g/l (4.25 lb/gallon) for reconditioned using spray application method, exterior body spray: 340 g/l (2.83 lb/gallon) for new and 420 g/l (3.5 lb/gallon) for reconditioned using spray application method, overvarnish (interior or exterior) 225 g/l (1.875 lb/gallon) using any application method, interior end coating: 420 g/l (3.5 lb/gallon) for new and 510 g/l (4.25 lb/gallon) for reconditioned using spray or roll coat application method, exterior end coating: 340 g/l (2.83 lb/gallon) for new and 420 g/l (3.5 lb/gallon) for reconditioned using spray or roll coat application method, side seam coating 660 g/l (5.5 lb/gallon) using spray application method, and end seal compound 60 g/l (0.5 lb/gallon) using any application method. [District Rule 4604]

CONDITIONS CONTINUE ON NEXT PAGE

33. The use of coatings and solvents with VOC content in excess of the applicable limits (mentioned in the above condition) shall be allowed, provided that each of the following are met: 1.) The VOC emission control system shall have an overall capture and control efficiency of at least 90% on weight basis during emission producing activities, 2.) The VOC emission control system reduce VOC emissions, at all times, to a level that is not greater than the emission level which would have been achieved through the use of materials compliant with the applicable requirements of Section 5.1 and Section 5.4 of Rule 4604 (9/20/07) during emission producing activities, 3.) The operator shall monitor key system operating parameters of VOC emission control system (i.e. differential pressures established for booth and PTE to ensure proper capture, and established minimum RTO chamber temperature), 4.) The operator shall implement an Operation and Maintenance (O/M) Plan pursuant to Section 6.5 of Rule 4604 (9/20/07) with 10 days of approval of the plan, 5.) The operator shall perform source test at least once every 12 months to determine control efficiency of the control system (RTO system) using non-compliant coating and under the conditions specified in the Permit to Operate. [District Rule 4604]
34. All fresh or spent solvents, waste solvent cleaning materials such as cloth, paper etc., coatings, adhesives, catalysts, thinners and solvents shall be stored in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4604]
35. Coatings shall be applied with properly operating coating equipment. [District Rule 4604]
36. The coating application equipment is operated according to operating procedures specified by the equipment manufacturer. [District Rule 4604]
37. Only electrostatic application, flow coater, roll coater, dip coater, hand application methods, HVLP spray, or any other application method that demonstrates to the District and EPA, a coating transfer efficiency of at least 65% as measured using a test method per section 6.7.4 of Rule 4604 (9/20/07) shall be used under this permit. In lieu of complying with this requirement, the operator may control emissions from application equipment with the VOC emission control system that meet the requirements of section 5.2 of Rule 4604 (9/20/07). [District Rule 4604]
38. For HVLP spray guns manufactured prior to January 1, 1996, the end user shall demonstrate that the gun meets HVLP spray equipment standards. Satisfactory proof will be either in the form of a manufacturer's published technical material or by a demonstration using a certified air pressure tip gauge, measuring the air atomizing pressure dynamically at the center of the air cap and at the air horns. [District Rule 4604]
39. The operator shall maintain and have available on site, a current list of coatings in use which provides all of the coating data necessary to evaluate compliance including the following information, as applicable: 1.) Specific manufacturer's name of coatings, catalysts and thinners used, 2.) Mix ratio of components used, and 3.) VOC content of each coating, as applied in g/l or lb/gal. [District Rule 4604]
40. The operator shall maintain daily records of the following items: 1.) Specific coating used and mix ratio of components added to the coating material prior to application, 2.) Volume of coatings applied (gallons), 3.) Specific solvents, catalysts and thinners used, and 4) Volume of each solvent, catalyst and thinner (gallons). [District Rule 4604]
41. The operator shall maintain and have available on site, a current list of cleaning solvents in use that provides all of the data necessary to evaluate compliance including the following information, as applicable: 1.) The name of the cleaning solvent and its manufacturer's name, and 2.) VOC content of the solvent expressed in g/l or lb/gal, as applied. [District Rule 4604]
42. The operator shall maintain daily records of the following items: 1.) Name of cleaning solvents used, 2.) When the solvent is a mixture of different materials that are blended by the operator, the mix ratio of the batch shall be recorded and the VOC content of the batch shall be calculated and recorded in order to determine compliance with the specified limits of VOC content. Records from before November 15, 2003 must still be retained on-site for five years from date of record, 3.) Volume of each cleaning solvent used (gallons), and 4.) The type of cleaning activity for each solvent that is being used in accordance with the applicable cleaning category specified in Section 5.4, Table 5 of Rule 4604 (9/20/07). [District Rule 4604]
43. The permittee shall keep daily records of key operating parameters, that is, differential pressures of the booth and PTE and RTO combustion chamber temperature. [District Rules 2201 and 4604]

CONDITIONS CONTINUE ON NEXT PAGE

44. The records showing violation of key operating parameters, that is, differential pressures for the booth and PTE and RTO combustion chamber temperature shall be reported to the District within 96 hours following the occurrence. Such records include an explanation of the cause of the violation and corrective action taken. [District Rule 2201 and 4604]
45. The permittee shall develop and submit Operation and Maintenance (O/M) Plan for the VOC emission control system prior to the implementation of this permit. This O/M plan shall be developed consistent with section 6.5.3 of Rule 4604 (9/20/07). [District Rule 4604]
46. The O/M Plan shall not be implemented prior to approval in writing by the District. [District Rule 4604]
47. The O/M Plan shall be updated prior to any planned change in operation of the VOC emission control system. The operator may request a change to the O/M Plan at any time. If the O/M Plan undergoes significant changes to one or more O/M Plan elements, an operator must notify the District no later than 7 days after the change, and must submit an updated O/M Plan to the District for approval no later than 14 days after the change. [District Rule 4604]
48. An O/M Plan is not required for an inactive VOC emission control system until 180 days before start-up. A period of shorter than 180 days may be allowed if it can be shown that the equipment will be started up sooner than expected. [District Rule 4604]
49. The operator shall retain all records for a minimum of five years, make the records available on site during normal business hours to the APCO, ARB, or EPA, and submit the records to the APCO, ARB, or EPA upon request. [District Rules 2201 and 4604]



COPY

AUTHORITY TO CONSTRUCT

PERMIT NO: N-1330-6-3

ISSUANCE DATE: 12/03/2012

LEGAL OWNER OR OPERATOR: GREIF INDUSTRIAL PACKAGING & SERVS LLC
MAILING ADDRESS: P O BOX 2146
MERCED, CA 95344

LOCATION: 2400 COOPER AVE
MERCED, CA 95344

EQUIPMENT DESCRIPTION:

MODIFICATION OF CAN AND COIL COATING OPERATION CONSISTING OF AN EXTERIOR HEAD PARTS COATING BOOTH; INSTALL A REGENERATIVE THERMAL OXIDIZER (RTO) THAT WILL SERVE PERMIT UNITS N-1330-2, '-3, '-4, '-5, '-6, AND '-7; INSTALL PERMANENT TOTAL ENCLOSURES AROUND SPRAY PAINT BOOTH N-1330-2, '-3, '-4, '-5 AND '-6; ESTABLISH FACILITY-WIDE VOC LIMIT OF 19,999 POUNDS PER YEAR, REPLACE QUARTERLY LIMITS WITH ANNUAL LIMITS. THE POST-PROJECT EQUIPMENT DESCRIPTION WILL BE: CAN AND COIL COATING OPERATION #5: EXTERIOR HEAD PARTS COATING BOOTH IN A PERMANENT TOTAL ENCLOSURE (PTE); AND A 3.9 MMBTU/HR DIRECT-FIRED NATURAL GAS BLUE SURF OVEN SHARED BY PERMITS N-1330-3 AND '-6. THE BOOTH ENCLOSURE AND THE CURING OVEN ARE VENTED TO A COMMON 4.6 MMBTU/HR NATURAL GAS-FIRED REGENERATIVE THERMAL OXIDIZER (RTO) SHARED AMONG PERMITS N-1330-2, '-3, '-4, '-5, '-6 AND '-7

CONDITIONS

1. Upon implementation of Authorities to Construct N-1330-2-3, '-3-2, '-4-2, '-5-2, '-6-3, '-7-6 and '-15-3, the facility will no longer be a Major Source for NOx, VOC, and Greenhouse Gas (GHG) emissions, and the facility may submit a Title V Minor Modification permit application to remove the Title V status. [District Rule 2520]
2. Upon implementation of Authorities to Construct N-1330-2-3, '-3-2, '-4-2, '-5-2, '-6-3, '-7-6 and '-15-3, Permits to Operate N-1330-8, '-9 and '-10 shall be cancelled. [District Rule 2201]
3. VOC emissions from the entire stationary source shall not exceed 19,999 pounds in any 12 consecutive month rolling period. The permittee shall maintain monthly records of VOC emissions to demonstrate compliance with this condition. [District Rule 2201]
4. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
5. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]

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 Sadreddin, Executive Director / APCD

DAVID WARNER, Director of Permit Services

N-1330-6-3 Dec 3, 2012 10:02AM - KAH/LONJ - No Inspection NOT Required

6. 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]
7. Exhaust fans shall be switched on prior to the start of paint spraying operations. [District Rule 2201]
8. All filters shall be properly maintained and must be in place during the painting operation. [District Rule 2201]
9. Emissions from the coating operation (paint and solvent use) shall not exceed any of following limits: 12.9 lb-VOC/day and 1,407 lb-VOC/year; and 0.2 lb-PM10/day and 20 lb-PM10/year. [District Rule 2201]
10. VOC emissions shall be estimated as follows: $\text{VOC (lb/day, lb/yr)} = (\text{Volume of coatings used (gal/day, gal/yr)} \times \text{material VOC content (lb-VOC/gal)} + \text{solvent use inside enclosure(s) vented to VOC control system (gal/day, gal/yr)} \times \text{VOC content (lb/gal)}) \times (1 - \text{overall capture and control efficiency (\%)}) + \text{solvent use outside enclosure(s) not vented to VOC control system (gal/day, gal/yr)} \times \text{VOC content (lb/gal)}$. [District Rule 2201]
11. PM10 emissions shall be estimated as follows: $\text{PM10 (lb/day, lb/yr)} = \text{Volume of coating used (gal/day, gal/yr)} \times \text{solids content (by weight)} \times \text{coating density (lb/gallon)} \times F \times (1 - \text{TE}) \times (1 - \text{CE})$, where F is the fraction (%) of the solids 10 micron or less, if not available, F can be set equal to 1; TE is the coating transfer efficiency of the application equipment, for HVLP/electrostatic use 80%, and for brush, dip, or roll coating application equipment use 100%, and CE is the booth filter control efficiency for PM10. [District Rule 2201]
12. The operator shall hire a third party contractor to de-rate the curing oven using a fuel restricting orifice (or equivalent permanent devices) such that the rated heat input shall not exceed 4.9 MMBtu/hr. The permittee shall keep all records including but not limited to scope of work, date of work performed, bill of materials purchased/replaced, new heat input rate, name of the personnel performing the work and company affiliation. [District Rules 2201 and 4309]
13. Emissions from natural gas combustion in the curing oven shall not exceed any of the following limits: 0.1 lb-NOx/MMBtu, 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 0.084 lb-CO/MMBtu, and 0.0055 lb-VOC/MMBtu. [District Rule 2201]
14. The combined VOC emissions from permit units N-1330-2, '-3, '-4, '-5, '-6 and '-7 including natural gas combustion in the RTO shall not exceed 216.7 pounds in any one day. [District Rule 2201]
15. Emissions from natural gas combustion in the RTO shall not exceed any of the following limits: 0.036 lb-NOx/MMBtu, 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 0.295 lb-CO/MMBtu, and 0.0055 lb-VOC/MMBtu. [District Rule 2201]
16. The VOC emission control system shall have an overall capture and control efficiency of at least 90 percent by weight. [District Rule 2201]
17. The permittee shall establish a maximum differential pressure across the spray booth exhaust filters and a minimum pressure differential across the PTE while demonstrating compliance with the overall capture and control efficiency. These differential pressures shall be included in the Permit to Operate. [District Rule 2201]
18. The permittee shall install permanent device(s) to continuously measure the differential pressure across the spray booth exhaust filter and the PTE under this permit to demonstrate on-going compliance with the overall capture and control efficiency. The measured differential readings shall be compared with the values established in this permit to detect and correct any problems with filter media, exhaust fans, enclosures or other similar apparatus in the system. [District Rule 2201]
19. The RTO shall be in operation, at or above the minimum operating chamber temperature being established during the initial source test, when any coating process operates. [District Rule 2201]
20. The RTO chambers shall be permanently equipped with temperature measurement devices such as thermocouples. The combustion temperature shall be continuously monitored and recorded whenever any coating process operates. [District Rule 2201]
21. The minimum temperature in the RTO combustion chamber (°F) shall be established during the initial source test while achieving the required overall capture and control efficiency. This temperature measurement shall be listed in the Permit to Operate. [District Rule 2201]
22. Sampling facilities for source testing shall be provided in accordance with the provisions of Rule 1081 (Source Sampling). [District Rule 1081]

CONDITIONS CONTINUE ON NEXT PAGE

23. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081]
24. Source testing to determine VOC capture efficiency of the enclosure set-up (booth and PTE) under this permit shall be conducted within 60 days of startup under this permit. [District Rule 2201]
25. Source testing to determine RTO control efficiency for VOC shall be conducted within 60 days of startup under this permit and at least once every 12 months thereafter. [District Rule 2201]
26. All emissions measurements shall be made with the units operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-lighting of the unit resulting from an unscheduled or unavoidable shut off of the fuel flow or electrical power to the unit. [District Rule 2201]
27. For source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rule 2201]
28. VOC capture efficiency shall be determined according to EPA's "Guidelines for Determining Capture Efficiency," January 9, 1995 and 40 CFR 51, Appendix M, Methods 204-204F, as applicable, or any other method approved by EPA, ARB and the District. [District Rules 2201 and 4604]
29. The RTO control efficiency shall be determined using EPA Methods 2, 2A, or 2D for measuring flow rates and EPA Methods 25, 25A, or 25B for measuring total gaseous organic concentrations at the inlet and outlet of the control device. EPA Method 18 or ARB Method 422 shall be used to determine the emissions of exempt compounds. Should the permittee decide to use a different test methodology, the methodology must first be approved by the District. [District Rules 2201 and 4604]
30. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081]
31. VOC content of solvents used shall not exceed 25 g/l (0.21 lb/gal) for product cleaning during manufacturing process or surface preparation for coating application, or repair and maintenance cleaning, or cleaning of coating application equipment, unless such cleaning operations are carried out within the control that meet the requirements of section 5.2 of Rule 4604 (9/20/07). [District Rule 4604]
32. VOC content of coatings as applied, excluding water and exempt compounds, used for drums and lids coating operations, shall not exceed any of the following limits, unless such coating operations are carried out within the control system that meet the requirements of section 5.2 of Rule 4604 (9/20/07) provided in the condition below: sheet base coating (interior or exterior) 225 g/l (1.875 lb/gallon) using any application method, interior body spray: 420 g/l (3.5 lb/gallon) for new and 510 g/l (4.25 lb/gallon) for reconditioned using spray application method, exterior body spray: 340 g/l (2.83 lb/gallon) for new and 420 g/l (3.5 lb/gallon) for reconditioned using spray application method, overvarnish (interior or exterior) 225 g/l (1.875 lb/gallon) using any application method, interior end coating: 420 g/l (3.5 lb/gallon) for new and 510 g/l (4.25 lb/gallon) for reconditioned using spray or roll coat application method, exterior end coating: 340 g/l (2.83 lb/gallon) for new and 420 g/l (3.5 lb/gallon) for reconditioned using spray or roll coat application method, side seam coating 660 g/l (5.5 lb/gallon) using spray application method, and end seal compound 60 g/l (0.5 lb/gallon) using any application method. [District Rule 4604]

CONDITIONS CONTINUE ON NEXT PAGE

33. The use of coatings and solvents with VOC content in excess of the applicable limits (mentioned in the above condition) shall be allowed, provided that each of the following are met: 1.) The VOC emission control system shall have an overall capture and control efficiency of at least 90% on weight basis during emission producing activities, 2.) The VOC emission control system reduce VOC emissions, at all times, to a level that is not greater than the emission level which would have been achieved through the use of materials compliant with the applicable requirements of Section 5.1 and Section 5.4 of Rule 4604 (9/20/07) during emission producing activities, 3.) The operator shall monitor key system operating parameters of VOC emission control system (i.e. differential pressures established for booth and PTE to ensure proper capture, and established minimum RTO chamber temperature), 4.) The operator shall implement an Operation and Maintenance (O/M) Plan pursuant to Section 6.5 of Rule 4604 (9/20/07) with 10 days of approval of the plan, 5.) The operator shall perform source test at least once every 12 months to determine control efficiency of the control system (RTO system) using non-compliant coating and under the conditions specified in the Permit to Operate. [District Rule 4604]
34. All fresh or spent solvents, waste solvent cleaning materials such as cloth, paper etc., coatings, adhesives, catalysts, thinners and solvents shall be stored in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4604]
35. Coatings shall be applied with properly operating coating equipment. [District Rule 4604]
36. The coating application equipment is operated according to operating procedures specified by the equipment manufacturer. [District Rule 4604]
37. Only electrostatic application, flow coater, roll coater, dip coater, hand application methods, HVLP spray, or any other application method that demonstrates to the District and EPA, a coating transfer efficiency of at least 65% as measured using a test method per section 6.7.4 of Rule 4604 (9/20/07) shall be used under this permit. In lieu of complying with this requirement, the operator may control emissions from application equipment with the VOC emission control system that meet the requirements of section 5.2 of Rule 4604 (9/20/07). [District Rule 4604]
38. For HVLP spray guns manufactured prior to January 1, 1996, the end user shall demonstrate that the gun meets HVLP spray equipment standards. Satisfactory proof will be either in the form of a manufacturer's published technical material or by a demonstration using a certified air pressure tip gauge, measuring the air atomizing pressure dynamically at the center of the air cap and at the air horns. [District Rule 4604]
39. The operator shall maintain and have available on site, a current list of coatings in use which provides all of the coating data necessary to evaluate compliance including the following information, as applicable: 1.) Specific manufacturer's name of coatings, catalysts and thinners used, 2.) Mix ratio of components used, and 3.) VOC content of each coating, as applied in g/l or lb/gal. [District Rule 4604]
40. The operator shall maintain daily records of the following items: 1.) Specific coating used and mix ratio of components added to the coating material prior to application, 2.) Volume of coatings applied (gallons), 3.) Specific solvents, catalysts and thinners used, and 4) Volume of each solvent, catalyst and thinner (gallons). [District Rule 4604]
41. The operator shall maintain and have available on site, a current list of cleaning solvents in use that provides all of the data necessary to evaluate compliance including the following information, as applicable: 1.) The name of the cleaning solvent and its manufacturer's name, and 2.) VOC content of the solvent expressed in g/l or lb/gal, as applied. [District Rule 4604]
42. The operator shall maintain daily records of the following items: 1.) Name of cleaning solvents used, 2.) When the solvent is a mixture of different materials that are blended by the operator, the mix ratio of the batch shall be recorded and the VOC content of the batch shall be calculated and recorded in order to determine compliance with the specified limits of VOC content. Records from before November 15, 2003 must still be retained on-site for five years from date of record, 3.) Volume of each cleaning solvent used (gallons), and 4.) The type of cleaning activity for each solvent that is being used in accordance with the applicable cleaning category specified in Section 5.4, Table 5 of Rule 4604 (9/20/07). [District Rule 4604]
43. The permittee shall keep daily records of key operating parameters, that is, differential pressures of the booth and PTE and RTO combustion chamber temperature. [District Rules 2201 and 4604]

CONDITIONS CONTINUE ON NEXT PAGE

44. The records showing violation of key operating parameters, that is, differential pressures for the booth and PTE and RTO combustion chamber temperature shall be reported to the District within 96 hours following the occurrence. Such records include an explanation of the cause of the violation and corrective action taken. [District Rule 2201 and 4604]
45. The permittee shall develop and submit Operation and Maintenance (O/M) Plan for the VOC emission control system prior to the implementation of this permit. This O/M plan shall be developed consistent with section 6.5.3 of Rule 4604 (9/20/07). [District Rule 4604]
46. The O/M Plan shall not be implemented prior to approval in writing by the District. [District Rule 4604]
47. The O/M Plan shall be updated prior to any planned change in operation of the VOC emission control system. The operator may request a change to the O/M Plan at any time. If the O/M Plan undergoes significant changes to one or more O/M Plan elements, an operator must notify the District no later than 7 days after the change, and must submit an updated O/M Plan to the District for approval no later than 14 days after the change. [District Rule 4604]
48. An O/M Plan is not required for an inactive VOC emission control system until 180 days before start-up. A period of shorter than 180 days may be allowed if it can be shown that the equipment will be started up sooner than expected. [District Rule 4604]
49. The operator shall retain all records for a minimum of five years, make the records available on site during normal business hours to the APCO, ARB, or EPA, and submit the records to the APCO, ARB, or EPA upon request. [District Rules 2201 and 4604]



COPY

AUTHORITY TO CONSTRUCT

PERMIT NO: N-1330-7-7

ISSUANCE DATE: 09/11/2013

LEGAL OWNER OR OPERATOR: GREIF INDUSTRIAL PACKAGING & SERVS LLC

MAILING ADDRESS: P O BOX 2146
MERCED, CA 95344

LOCATION: 2400 COOPER AVE
MERCED, CA 95344

EQUIPMENT DESCRIPTION:

MODIFICATION OF SHEET ROLL COATER SYSTEM CONSISTING OF A WAGNER ROLL COAT MACHINE WITH A VOC CAPTURE ENCLOSURE AND A 12.5 MMBTU/HR WAGNER PAINT CURING OVEN WITH A 2.6 MMBTU/HR JO ROSS ENGINEERING DIRECT FLAME AFTERBURNER: REMOVE THE AFTERBURNER AND INSTALL A COMMON REGENERATIVE THERMAL OXIDIZER (RTO) THAT WILL SERVE PERMIT UNITS N-1330-2, '-3, '-4, '-5, '-6, AND '-7; ESTABLISH FACILITY-WIDE VOC LIMIT OF 19,999 POUNDS PER YEAR; REPLACE QUARTERLY LIMITS WITH ANNUAL LIMITS, AND REPLACE BURNER SYSTEM OF THE PAINT CURING OVEN WITH A 12.0 MMBTU/HR (0.4 MMBTU/HR/FT X 30 FT) MAXON NP LOW-NOX BURNER SYSTEM

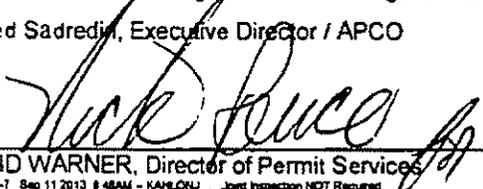
CONDITIONS

1. This Authority to Construct (ATC) permit cancels and replaces the ATC N-1330-7-6. [District Rule 2201]
2. 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]
3. Upon implementation of Authorities to Construct N-1330-2-3, '-3-2, '-4-2, '-5-2, '-6-3, '-7-7 and '-15-3, the facility will no longer be a Major Source for NOx, VOC, and Greenhouse Gas (GHG) emissions, and the facility may submit a Title V Minor Modification permit application to remove the Title V status. [District Rule 2520]
4. Upon implementation of Authorities to Construct N-1330-2-3, '-3-2, '-4-2, '-5-2, '-6-3, '-7-7 and '-15-3, Permits to Operate N-1330-8, '-9 and '-10 shall be cancelled. [District Rule 2201]
5. VOC emissions from the entire stationary source shall not exceed 19,999 pounds in any 12 consecutive month rolling period. The permittee shall maintain monthly records of VOC emissions to demonstrate compliance with this condition. [District Rule 2201]
6. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

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-1330-7-7 Sep 11 2013 8:48AM - KANLONU Joint Inspection NOT Required

7. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
8. 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]
9. Exhaust fans shall be switched on prior to the start of paint spraying operations. [District Rule 2201]
10. Emissions from the coating operation (paint and solvent use) shall not exceed any of following limits: 74.6 lb-VOC/day and 13,526 lb-VOC/year; and 9.2 lb-PM10/day and 3,358 lb-PM10/year. [District Rule 2201]
11. VOC emissions shall be estimated as follows: $\text{VOC (lb/day, lb/yr)} = (\text{Volume of coatings used (gal/day, gal/yr)} \times \text{material VOC content (lb-VOC/gal)} + \text{solvent use inside enclosure(s) vented to VOC control system (gal/day, gal/yr)} \times \text{VOC content (lb/gal)}) \times (1 - \text{overall capture and control efficiency (\%)}) + \text{solvent use outside enclosure(s) not vented to VOC control system (gal/day, gal/yr)} \times \text{VOC content (lb/gal)}$. [District Rule 2201]
12. PM10 emissions shall be estimated as follows: $\text{PM10 (lb/day, lb/yr)} = \text{Volume of coating used (gal/day, gal/yr)} \times \text{solids content (by weight)} \times \text{coating density (lb/gallon)} \times F \times (1 - \text{TE}) \times (1 - \text{CE})$, where F is the fraction (%) of the solids 10 micron or less, if not available, F can be set equal to 1; TE is the coating transfer efficiency of the application equipment, for HVLP/electrostatic use 80%, and for brush, dip, or roll coating application equipment use 100%, and CE is the booth filter control efficiency for PM10. [District Rule 2201]
13. Emissions from the curing oven shall not exceed any of the following limits: 4.3 ppmvd NOx @ 19% O2 (or 4.3 ppmvd if oven stack O2 exceeds 19% vol.) and 42 ppmvd CO @ 19% O2 (or 42 ppmvd if oven stack O2 exceeds 19% vol.). These emissions include emissions from combustion process as well as process emissions. [District Rules 2201 and 4309]
14. Emissions from the natural gas combustion in the curing oven shall not exceed any of the following limits 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, and 0.0055 lb-VOC/MMBtu. [District Rule 2201]
15. The combined VOC emissions from permit units N-1330-2, '-3, '-4, '-5, '-6 and '-7 including natural gas combustion in the RTO shall not exceed 216.7 pounds in any one day. [District Rule 2201]
16. Emissions from natural gas combustion in the RTO shall not exceed any of the following limits: 0.036 lb-NOx/MMBtu, 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 0.295 lb-CO/MMBtu, and 0.0055 lb-VOC/MMBtu. [District Rule 2201]
17. The VOC emission control system shall have an overall capture and control efficiency of at least 90 percent by weight. [District Rule 2201]
18. The permittee shall establish a minimum pressure differential across the roll coat system while demonstrating compliance with the overall capture and control efficiency. The differential pressure shall be included in the Permit to Operate. [District Rule 2201]
19. The permittee shall install permanent device(s) to continuously measure the differential pressure across the PTE under this permit to demonstrate on-going compliance with the capture efficiency. The measured differential readings shall be compared with the values established in this permit to detect and correct any problems with filter media, exhaust fans, enclosures or other similar apparatus in the system. [District Rule 2201]
20. The RTO shall be in operation, at or above the minimum operating chamber temperature being established during the initial source test, when any coating process operates. [District Rule 2201]
21. The RTO shall reduce at least 95% of the captured VOC emissions. [District Rule 2201]
22. The RTO chambers shall be permanently equipped with temperature measurement devices such as thermocouples. The combustion temperature shall be continuously monitored and recorded whenever any coating process operates. [District Rule 2201]
23. The minimum temperature in the RTO combustion chamber (°F) shall be established during the initial source test while achieving the required overall capture and control efficiency. This temperature measurement shall be listed in the Permit to Operate. [District Rule 2201]
24. Sampling facilities for source testing shall be provided in accordance with the provisions of Rule 1081 (Source Sampling). [District Rule 1081]

CONDITIONS CONTINUE ON NEXT PAGE

25. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081]
26. Source testing to determine VOC capture efficiency of the enclosure under this permit shall be conducted within 60 days of startup under this permit. Source testing conducted under ATC N-1330-7-6 may be substituted to fulfill the requirements of this condition instead of performing another test. [District Rule 2201]
27. Source testing to determine RTO control efficiency for VOC shall be conducted within 60 days of startup under this permit and at least once every 12 months thereafter. Source testing conducted under ATC N-1330-7-6 may be substituted to fulfill the requirements of initial test. [District Rule 2201]
28. Source testing to measure NO_x and CO emissions from the curing oven shall be conducted within 60 days of startup under this permit. The source testing shall be conducted at least once every 24 months after the initial test, except, if the curing oven operates less than 50 days per calendar year, the oven shall be tested at least once every 36 months. Source testing conducted under ATC N-1330-7-6 may be substituted to fulfill the requirements of initial test. [District Rules 2201 and 4309]
29. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4309. [District Rule 4309]
30. For source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 2201 and 4309]
31. The capture efficiency shall be determined according to EPA's "Guidelines for Determining Capture Efficiency," January 9, 1995 and 40 CFR 51, Appendix M, Methods 204-204F, as applicable, or any other method approved by EPA, ARB and the District. [District Rules 2201 and 4604]
32. The RTO control efficiency shall be determined using EPA Methods 2, 2A, or 2D for measuring flow rates and EPA Methods 25, 25A, or 25B for measuring total gaseous organic concentrations at the inlet and outlet of the control device. EPA Method 18 or ARB Method 422 shall be used to determine the emissions of exempt compounds. Should the permittee decide to use a different test methodology, the methodology must first be approved by the District. [District Rules 2201 and 4604]
33. NO_x emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis. [District Rule 4309]
34. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rule 4309]
35. Stack gas oxygen (O₂) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4309]
36. Stack gas velocities shall be determined using EPA Method 2. [District Rule 4309]
37. Stack gas moisture content shall be determined using EPA Method 4. [District Rule 4309]
38. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081]
39. The permittee shall monitor and record the stack concentration of NO_x, CO, and O₂ at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rule 4309]

CONDITIONS CONTINUE ON NEXT PAGE

40. If either the NO_x or CO concentrations corrected to 19% O₂ (or no correction if measured above 19% O₂), as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rule 4309]
41. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4309]
42. VOC content of coatings as applied, excluding water and exempt compounds, used for drums and lids coating operations, shall not exceed any of the following limits, unless such coating operations are carried out within the control system that meet the requirements of section 5.2 of Rule 4604 (9/20/07) provided in the condition below: sheet base coating (interior or exterior) 225g/l (1.875 lb/gallon) using any application method, interior body spray: 420 g/l (3.5 lb/gallon) for new and 510 g/l (4.25 lb/gallon) for reconditioned using spray application method, exterior body spray: 340 g/l (2.83 lb/gallon) for new and 420 g/l (3.5 lb/gallon) for reconditioned using spray application method, overvarnish (interior or exterior) 225 g/l (1.875 lb/gallon) using any application method, interior end coating: 420 g/l (3.5 lb/gallon) for new and 510 g/l (4.25 lb/gallon) for reconditioned using spray or roll coat application method, exterior end coating: 340 g/l (2.83 lb/gallon) for new and 420 g/l (3.5 lb/gallon) for reconditioned using spray or roll coat application method, side seam coating 660 g/l (5.5 lb/gallon) using spray application method, and end seal compound 60 g/l (0.5 lb/gallon) using any application method. [District Rule 4604]
43. VOC content of solvents used shall not exceed 25 g/l (0.21 lb/gal) for product cleaning during manufacturing process or surface preparation for coating application, or repair and maintenance cleaning, or cleaning of coating application equipment, unless such cleaning operations are carried out within the control that meet the requirements of section 5.2 of Rule 4604 (9/20/07). [District Rule 4604]
44. The use of coatings and solvents with VOC content in excess of the applicable limits (mentioned in the above conditions) shall be allowed, provided that each of the following are met: 1.) The VOC emission control system shall have an overall capture and control efficiency of at least 90% on weight basis during emission producing activities, 2.) The VOC emission control system reduce VOC emissions, at all times, to a level that is not greater than the emission level which would have been achieved through the use of materials compliant with the applicable requirements of Section 5.1 and Section 5.4 of Rule 4604 (9/20/07) during emission producing activities, 3.) The operator shall monitor key system operating parameters of VOC emission control system ((i.e. differential pressure established for the enclosure to ensure proper capture, and established minimum RTO chamber temperature), 4.) The operator shall implement an Operation and Maintenance (O/M) Plan pursuant to Section 6.5 of Rule 4604 (9/20/07) with 10 days of approval of the plan, 5.) The operator shall perform source test at least once every 12 months to determine control efficiency of the control system (RTO system) using non-compliant coating and under the conditions specified in the Permit to Operate. [District Rule 4604]
45. All fresh or spent solvents, waste solvent cleaning materials such as cloth, paper etc., coatings, adhesives, catalysts, thinners and solvents shall be stored in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4604]
46. Coatings shall be applied with properly operating coating equipment. [District Rule 4604]
47. The coating application equipment is operated according to operating procedures specified by the equipment manufacturer. [District Rule 4604]

CONDITIONS CONTINUE ON NEXT PAGE

48. Only electrostatic application, flow coater, roll coater, dip coater, hand application methods, HVLP spray, or any other application method that demonstrates to the District and EPA, a coating transfer efficiency of at least 65% as measured using a test method per section 6.7.4 of Rule 4604 (9/20/07) shall be used under this permit. In lieu of complying with this requirement, the operator may control emissions from application equipment with the VOC emission control system that meet the requirements of section 5.2 of Rule 4604 (9/20/07). [District Rule 4604]
49. For HVLP spray guns manufactured prior to January 1, 1996, the end user shall demonstrate that the gun meets HVLP spray equipment standards. Satisfactory proof will be either in the form of a manufacturer's published technical material or by a demonstration using a certified air pressure tip gauge, measuring the air atomizing pressure dynamically at the center of the air cap and at the air horns. [District Rule 4604]
50. The operator shall maintain and have available on site, a current list of coatings in use which provides all of the coating data necessary to evaluate compliance including the following information, as applicable: 1.) Specific manufacturer's name of coatings, catalysts and thinners used, 2.) Mix ratio of components used, and 3.) VOC content of each coating, as applied in g/l or lb/gal. [District Rule 4604]
51. The operator shall maintain daily records of the following items: 1.) Specific coating used and mix ratio of components added to the coating material prior to application, 2.) Volume of coatings applied (gallons), 3.) Specific solvents, catalysts and thinners used, and 4) Volume of each solvent, catalyst and thinner (gallons). [District Rule 4604]
52. The operator shall maintain and have available on site, a current list of cleaning solvents in use that provides all of the data necessary to evaluate compliance including the following information, as applicable: 1.) The name of the cleaning solvent and its manufacturer's name, and 2.) VOC content of the solvent expressed in g/l or lb/gal, as applied. [District Rule 4604]
53. The operator shall maintain daily records of the following items: 1.) Name of cleaning solvents used, 2.) When the solvent is a mixture of different materials that are blended by the operator, the mix ratio of the batch shall be recorded and the VOC content of the batch shall be calculated and recorded in order to determine compliance with the specified limits of VOC content. Records from before November 15, 2003 must still be retained on-site for five years from date of record, 3.) Volume of each cleaning solvent used (gallons), and 4.) The type of cleaning activity for each solvent that is being used in accordance with the applicable cleaning category specified in Section 5.4, Table 5 of Rule 4604 (9/20/07). [District Rule 4604]
54. The permittee shall keep daily records of key operating parameters, that is, differential pressures of the PTE and RTO combustion chamber temperature. [District Rules 2201 and 4604]
55. The records showing violation of key operating parameters, that is, differential pressures for the booth and PTE and RTO combustion chamber temperature shall be reported to the District within 96 hours following the occurrence. Such records include an explanation of the cause of the violation and corrective action taken. [District Rule 2201 and 4604]
56. The permittee shall develop and submit Operation and Maintenance (O/M) Plan for the VOC emission control system prior to the implementation of this permit. This O/M plan shall be developed consistent with section 6.5.3 of Rule 4604 (9/20/07). [District Rule 4604]
57. The O/M Plan shall not be implemented prior to approval in writing by the District. [District Rule 4604]
58. The O/M Plan shall be updated prior to any planned change in operation of the VOC emission control system. The operator may request a change to the O/M Plan at any time. If the O/M Plan undergoes significant changes to one or more O/M Plan elements, an operator must notify the District no later than 7 days after the change, and must submit an updated O/M Plan to the District for approval no later than 14 days after the change. [District Rule 4604]
59. An O/M Plan is not required for an inactive VOC emission control system until 180 days before start-up. A period of shorter than 180 days may be allowed if it can be shown that the equipment will be started up sooner than expected. [District Rule 4604]
60. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 19% O₂ (or no correction if measured above 19% O₂), (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rule 4309]

CONDITIONS CONTINUE ON NEXT PAGE

61. The permittee shall maintain daily records of hours of operations, type and quantity of fuel used in the oven. [District Rule 4309]
62. All test results for NO_x and CO shall be reported in ppmv @ 19% O₂ (or no correction if measured above 19% O₂), corrected to dry stack conditions. [District Rule 4309]
63. The operator shall retain all records for a minimum of five years, make the records available on site during normal business hours to the APCO, ARB, or EPA, and submit the records to the APCO, ARB, or EPA upon request. [District Rules 2201 and 4604]



San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT



HEALTHY AIR LIVING™
COPY

AUTHORITY TO CONSTRUCT

PERMIT NO: N-1330-15-3

ISSUANCE DATE: 12/03/2012

LEGAL OWNER OR OPERATOR: GREIF INDUSTRIAL PACKAGING & SERVS LLC
MAILING ADDRESS: P O BOX 2146
 MERCED, CA 95344

LOCATION: 2400 COOPER AVE
 MERCED, CA 95344

EQUIPMENT DESCRIPTION:

MODIFICATION OF 8.4 MMBTU/HR HURST MODEL S4-200-150 BOILER WITH AN INDUSTRIAL COMBUSTION LOW NOX BURNER AND INDUCED FLUE GAS RECIRCULATION: ESTABLISH FACILITY-WIDE VOC LIMIT OF 19,999 POUNDS PER YEAR

CONDITIONS

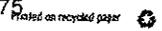
1. Upon implementation of Authorities to Construct N-1330-2-3, '-3-2, '-4-2, '-5-2, '-6-3, '-7-6 and '-15-3, the facility will no longer be a Major Source for NOx, VOC, and Greenhouse Gas (GHG) emissions, and the facility may submit a Title V Minor Modification permit application to remove the Title V status. [District Rule 2520]
2. Upon implementation of Authorities to Construct N-1330-2-3, '-3-2, '-4-2, '-5-2, '-6-3, '-7-6 and '-15-3, Permits to Operate N-1330-8, '-9 and '-10 shall be cancelled. [District Rule 2201]
3. VOC emissions from the entire stationary source shall not exceed 19,999 pounds in any 12 consecutive month rolling period. The permittee shall maintain monthly records of VOC emissions to demonstrate compliance with this condition. [District Rule 2201]
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 2201]
5. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
6. 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]
7. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
8. The unit shall only be fired on PUC-quality natural gas. [District Rules 2201 and 4320]

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-1330-15-3, Dec 3 2012 10:28AM - KAHLONU Joint Inspection NOT Required



9. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of natural gas combusted in the unit shall be installed, utilized and maintained. [District Rules 2201, 4305, and 4306]
10. Heat input to this unit shall not exceed 30 billion Btu per calendar year. [District Rules 2201, 4305 and 4306]
11. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NO_x emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NO_x emission limit listed in Rule 4320. [District Rule 4320]
12. Emissions rates from the natural gas-fired unit shall not exceed any of the following limits: 30 ppmv NO_x @ 3% O₂ or 0.036 lb-NO_x/MMBtu, 0.00285 lb-SO_x/MMBtu, 0.0076 lb-PM₁₀/MMBtu, 100 ppmv CO @ 3% O₂ or 0.073 lb-CO/MMBtu, or 10 ppmv @ 3% O₂ 0.0042 lb-VOC/MMBtu. [District Rules 2201, 4305, and 4306]
13. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081]
14. Source testing to measure NO_x and CO emissions from this unit while fired on natural gas shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306 and 4320]
15. During the 36-month source testing interval, the owner/operator shall have unit tuned at least twice each calendar year, from four to eight months apart, in which it operates, by a technician that is qualified, to the satisfaction of the APCO, in accordance with the procedure described in Rule 4304 (Equipment Tuning Procedure for Boilers, Steam Generators, and Process Heaters). [District Rules 4306 and 4320]
16. If the unit does not operate throughout a continuous six-month period within a calendar year, only one tune-up is required for that calendar year. No tune-up is required for any unit that is not operated during that calendar year; this unit may be test fired to verify availability of the unit for its intended use, but once the test firing is completed the unit shall be shutdown. [District Rules 4306 and 4320]
17. NO_x emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306 and 4320]
18. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306 and 4320]
19. Stack gas oxygen (O₂) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306 and 4320]
20. Fuel sulfur content shall be determined using EPA Method 11 or Method 15. [District Rule 4320]
21. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306 and 4320]
22. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 4306 and 4320]
23. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306 and 4320]
24. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081]

25. The flue gas recirculation valve(s) setting shall be monitored at least on a weekly basis. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last week. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rules 4305, 4306 and 4320]
26. The acceptable settings for the flue gas recirculation valve(s) shall be established by source testing this unit or other representative units per Rule 4305 and as approved by the District. The normal range/level shall be that for which compliance with applicable NOx and CO emissions rates have been demonstrated through source testing at a similar firing rate. [District Rules 4305, 4306 and 4320]
27. Normal range or level for the flue gas recirculation valve(s) settings shall be re-established during each source test required by this permit. [District Rules 4305, 4306 and 4320]
28. If the flue gas recirculation valve(s) setting is less than the normal range/level, the permittee shall return the flue gas recirculation valve(s) setting to the normal range/level as soon as possible, but no longer than 1 hour of operation after detection. If the flue gas recirculation valve(s) setting is not returned to the normal range/level within 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour, and conduct a source test within 60 days of the first exceedance, to demonstrate compliance with the applicable emission limits at the new flue gas recirculation valve(s) setting. A District-approved portable analyzer may be used in lieu of a source test to demonstrate compliance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306 and 4320]
29. The permittee shall maintain records of the date and time of flue gas recirculation valve(s) settings, the observed setting, and the firing rate at the time of the flue gas recirculation valve(s) setting measurements. The records must also include a description of any corrective action taken to maintain the flue gas recirculation valve(s) setting within the acceptable range. [District Rules 4305, 4306 and 4320]
30. Permittee shall determine sulfur content of combusted gas annually or shall demonstrate that the combusted gas is provided from a PUC or FERC regulated source. [District Rules 1081 and 4320]
31. Records of monthly and annual heat input of the unit shall be maintained. [District Rules 2201, 4305, and 4306]
32. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320]

ATTACHMENT C

Emissions Increases

	SSIPE (lb/yr)				
	NOx	VOC	CO	SOx	PM10
N-1330-2-3	0	0	8,139	0	0
N-1330-3-2	0	0	0	0	0
N-1330-4-2	0	0	0	0	0
N-1330-5-2	0	0	0	0	0
N-1330-6-3	0	0	0	0	0
N-1330-7-7	0	0	0	0	0
N-1330-15-3	0	0	0	0	0
TOTAL	0	0	8,139	0	0

ATTACHMENT D

Application



San Joaquin Valley Air Pollution Control District

www.valleyair.org

RECEIVED
HEALTHY AIR LIVING
JUL 30 2014

Permit Application For:

Permits Services
SJVAPCD

ADMINISTRATIVE AMENDMENT MINOR MODIFICATION SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: Greif Industrial Packaging & Services LLC	
2. MAILING ADDRESS: STREET/P.O. BOX: PO BOX 2146 CITY: Merced STATE: CA 9-DIGIT ZIP CODE: 95344	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: 2400 Cooper Avenue CITY: Merced ¼ SECTION TOWNSHIP RANGE	INSTALLATION DATE:
4. GENERAL NATURE OF BUSINESS: Metal Container Coating Operation	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) This application is to implement ATCs N-1330-2-3, '-3-2, '-4-2, '-5-2, '-6-3, '-7-6 and '-15-3, and remove the Title V status of the facility.	
6. TYPE OR PRINT NAME OF APPLICANT: Farrell Smith	TITLE OF APPLICANT: Plant Manager
7. SIGNATURE OF APPLICANT: <i>Farrell Smith</i> DATE: 7/22/14	PHONE: (209) 383-4396 FAX: (209) 383-5204 EMAIL: farrell.smith@greif.com

For APCD Use Only:

DATE STAMP	FILING FEE RECEIVED: \$ _____ CHECK#: _____
	DATE PAID: _____
	PROJECT NO: N-1142833 FACILITY ID: N-1330

Central Regional Office • 1990 E. Gettysburg Avenue • Fresno, CA 93726-0244 • (559) 230-5900 • FAX (559) 230-6061

**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: Greif Industrial Packaging & Services LLC	FACILITY ID: N- 1330
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:	
3. Agent to the Owner: Farrell Smith	

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 foregoing is correct and true:

Farrell Smith
Signature of Responsible Official

2/29/14
Date

Farrell Smith
Name of Responsible Official (please print)

Plant Manager
Title of Responsible Official (please print)

ATTACHMENT E

Previous Title V Operating Permit

No.s N-1330-2-2, -3-1, -4-1, -5-1, -6-2, -7-5, and -15-2

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1330-2-2

EXPIRATION DATE: 09/30/2017

EQUIPMENT DESCRIPTION:

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

PERMIT UNIT REQUIREMENTS

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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

Facility Name: GREIF INDUSTRIAL PACKAGING & SERVS LLC

Location: 2400 COOPER AVE, MERCED, CA 95344

N-1330-2-2 : Oct 27 2014 9:40AM -- AIYABEUJ

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

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

Facility Name: GREIF INDUSTRIAL PACKAGING & SERVS LLC

Location: 2400 COOPER AVE, MERCED, CA 95344

N-1330-2-2: Oct 27 2014 9:40AM - AIYABEIJ

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1330-3-1

EXPIRATION DATE: 09/30/2017

EQUIPMENT DESCRIPTION:

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

PERMIT UNIT REQUIREMENTS

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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

Facility Name: GREIF INDUSTRIAL PACKAGING & SERVS LLC

Location: 2400 COOPER AVE, MERCED, CA 95344

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

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1330-4-1

EXPIRATION DATE: 09/30/2017

EQUIPMENT DESCRIPTION:

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

PERMIT UNIT REQUIREMENTS

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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

Facility Name: GREIF INDUSTRIAL PACKAGING & SERVS LLC

Location: 2400 COOPER AVE, MERCED, CA 95344

N-1330-4-1 : Oct 27 2014 9:40AM -- AIYABEUJ

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

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

Facility Name: GREIF INDUSTRIAL PACKAGING & SERVS LLC

Location: 2400 COOPER AVE, MERCED, CA 95344

N-1330-4-1 : Oct 27 2014 9:40AM -- AIYABEU

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1330-5-1

EXPIRATION DATE: 09/30/2017

EQUIPMENT DESCRIPTION:

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

PERMIT UNIT REQUIREMENTS

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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

Facility Name: GREIF INDUSTRIAL PACKAGING & SERVS LLC

Location: 2400 COOPER AVE, MERCED, CA 95344

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

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1330-6-2

EXPIRATION DATE: 09/30/2017

EQUIPMENT DESCRIPTION:

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

PERMIT UNIT REQUIREMENTS

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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

Facility Name: GREIF INDUSTRIAL PACKAGING & SERVS LLC

Location: 2400 COOPER AVE, MERCED, CA 95344

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

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1330-7-5

EXPIRATION DATE: 09/30/2017

EQUIPMENT DESCRIPTION:

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

PERMIT UNIT REQUIREMENTS

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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

Facility Name: GREIF INDUSTRIAL PACKAGING & SERVS LLC

Location: 2400 COOPER AVE, MERCED, CA 95344

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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1330-15-2

EXPIRATION DATE: 09/30/2017

EQUIPMENT DESCRIPTION:

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

PERMIT UNIT REQUIREMENTS

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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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Facility Name: GREIF INDUSTRIAL PACKAGING & SERVS LLC

Location: 2400 COOPER AVE, MERCED, CA 95344

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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

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Facility Name: GREIF INDUSTRIAL PACKAGING & SERVS LLC

Location: 2400 COOPER AVE, MERCED, CA 95344

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