San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

FEB 22 2012

Bob Bennett
Silgan Containers
6180 Roselle Avenue
Riverbank, CA 95355

Re: Proposed Authority to Construct / Certificate of Conformity (Minor Mod)
District Facility # N-3243
Project # N1113794

Dear Mr. Bennett:

Enclosed for your review is the District's analysis of your application for Authority to Construct for the facility identified above. You have requested that a Certificate of Conformity with the procedural requirements of 40 CFR Part 70 be issued with this project. This project is to install a new sanitary steel can manufacturing line.

After addressing any EPA comments made during the 45-day comment period, the Authority to Construct will be issued to the facility with a Certificate of Conformity. Prior to operating with modifications authorized by the Authority to Construct, the facility must submit an application to modify the Title V permit as an administrative amendment, in accordance with District Rule 2520, Section 11.5.

If you have any questions, please contact Mr. Rupi Gill, Permit Services Manager, at (209) 557-6400.

Thank you for your cooperation in this matter.

Sincerely,

David Warner
Director of Permit Services

DW:JK/st

Enclosures

Seyed Sadredin
Executive Director/Air Pollution Control Officer

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

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

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

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AIR POLLUTION CONTROL DISTRICT

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FEB 22 2012

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

Re: **Proposed Authority to Construct / Certificate of Conformity (Minor Mod)**
District Facility # N-3243
Project # N1113794

Dear Mr. Rios:

Enclosed for your review is the District's engineering evaluation of an application for Authority to Construct for Silgan Containers, located at 4210 Yosemite Blvd, Modesto, California, which has been issued a Title V permit. Silgan Containers is requesting that a Certificate of Conformity, with the procedural requirements of 40 CFR Part 70, be issued with this project. This project is to install a new sanitary steel can manufacturing line.

Enclosed is the engineering evaluation of this application and proposed Authority to Construct # N-3243-3-0 with Certificate of Conformity. After demonstrating compliance with the Authority to Construct, the conditions will be incorporated into the facility's Title V permit through an administrative amendment.

Please submit your written comments on this project within the 45-day comment period that begins on the date you receive this letter. If you have any questions, please contact Mr. Rupi Gill, Permit Services Manager, at (209) 557-6400.

Thank you for your cooperation in this matter.

Sincerely,

David Warner
Director of Permit Services

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San Joaquin Valley Air Pollution Control District
Authority to Construct
Application Review

Facility Name:	Silgan Containers	Date:	February 6, 2012
Mailing Address:	6180 Roselle Avenue Riverbank, CA 95355	Engineer:	Jagmeet Kahlon
		Lead Engineer:	Nick Peirce
Contact Person:	Bob Bennett		
Telephone:	(209) 523-776 ext. 7234		
Fax:	(209) 523-6728		
Application #(s):	N-3243-3-0		
Project #:	N1113794		
Deemed Complete:	December 12, 2011		

I. PROPOSAL

Silgan Containers is requesting an Authority to Construct permit to install a new sanitary steel can manufacturing line, which will consist of a Soudronic Model FFB 1080 weld body maker, a Soudronic Model P-120 U side seam powder coating applicator, and a 0.455 MMBtu/hr Soudronic Model USC G direct-fired natural gas curing oven. The proposed can manufacturing line will be identical to the can manufacturing line permitted under permit C-2253-6 project C1063325 in 2006.

The proposed curing oven is a low emitting unit, and does not pose any significant health risks to the nearest receptor. Therefore, this oven is exempt from the District permit requirements (please refer to the discussion under Rule 2020 – Exemptions in section VIII of this document).

Silgan Containers is a Major Source for VOC emissions, and was issued a Title V permit on October 31, 2011. The proposed project is a Minor Modification to the Title V permit. The applicant has requested to issue the ATC with a Certificate of Conformity (COC), which is EPA's 45-day review of the project prior to the issuance of the final ATC.

II. APPLICABLE RULES

Rule 2020	Exemptions (8/18/11)
Rule 2201	New and Modified Stationary Source Review (4/21/11)
Rule 2520	Federally Mandated Operating Permits (6/21/01)
Rule 4001	New Source Performance Standards (4/14/99)
Rule 4002	National Emissions Standards for Hazardous Air Pollutants (5/20/04)

Rule 4101 Visible Emissions (02/17/05)
Rule 4102 Public Nuisance (12/17/92)
Rule 4201 Particulate Matter Concentration (12/17/92)
Rule 4202 Particulate matter Emission Rate (12/17/92)
Rule 4604 Can and Coil Coating Operations (9/20/07)
California Health & Safety Code 41700 (Public Nuisance)
California Health & Safety Code 42301.6 (School Notice)
Public Resources Code 21000-21177: California Environmental Quality Act (CEQA)
California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387: CEQA Guidelines

III. PROJECT LOCATION

The proposed units will be located at 4210 Yosemite Blvd., Modesto, California. This location is not within 1,000 feet of any K-12 school. Therefore, the school noticing requirements of California Health and Safety Code, Section 42301.6 do not apply.

IV. PROCESS DESCRIPTION

Flat, pre-coated can body blanks are fed into a body maker where they are rounded, the ends are butted, and welded to form a can body. The welding causes the pre-applied coating in the area to be damaged. After the can bodies leave the body maker, a side stripe applicator applies a powder coating over the welded side seam using an electrostatic applicator. The purpose of the side stripe is to repair the damaged coating in the area of the weld. The powder coating application takes place inside the can body and directly under a suction hood that collects any fugitive particulate matter from the powder coating process and exhausts it to a cartridge filter dust collector and powder recycling system.

After the side seam powder coating is applied, the powder coating is cured in a 0.455 MMBtu/hr direct-fired natural gas oven.

The facility can operate 24 hr/day, 7 day/week, and 365 day/yr.

V. EQUIPMENT LISTING

CAN SIDE STRIPE COATING LINE #3 WITH A SOUDRONIC FBB 1080 BODY MAKER, A SOUDRONIC P-120-U SIDE STRIPE APPLICATION UNIT, AND A PERMIT EXEMPT CURING OVEN

The total horsepower rating for the can manufacturing line including the welding equipment and exhaust fans is 203 hp.

VI. EMISSION CONTROL TECHNOLOGY EVALUATION

Particulate matter, less than 10 microns in aerodynamic diameter (PM_{10}), is the only pollutant of concern emitted from the equipment being permitted under this project. The powder coating operation will be vented to a dust collection and capture system. This system is expected to capture and control at least 99% of the PM_{10} emissions based on the evaluation of an identical unit under project C1063325.

VII. CALCULATIONS

A. Assumptions

- Only PM_{10} emissions will be emitted from the powder coating operation.
- The weld body maker is assumed to not generate any emissions. (Source: project C1063325 per project C1063325, where a similar system was permitted)
- The proposed powder coatings, Valspar and Vecodur VP99 do not contain any VOCs. (Source: project C1063325 where a similar system was permitted).
- Other assumptions will be stated as they are made during the evaluation.

B. Emission Factors (EF)

Side seam powder coating operation:
The proposed equipment and powder coatings are identical to the can manufacturing line permitted under C-2253-6-0, project C1063325. Thus, emission factor from PTO C-2253-6-0 would be appropriate to use for this project.

EF = 8.2×10^{-6} lb-PM_{10}/lb of powder coating applied

C. Potential to Emit

1. Pre-Project Potential to Emit

   PE1 = 0

2. Post-Project Potential to Emit

   Side seam powder coating operation:
   The applicant has proposed to apply a maximum of 425 pounds of powder in a given day. Thus,

PE2 = (8.2 x 10^{-6} lb-PM_{10}/lb of powder coating applied)(425 lb-powder/day)
= 0.0 lb/day

Assuming worst-case operating scenario of 365 days a year, the potential annual emissions would be:

PE2 = (8.2 x 10^{-6} lb-PM_{10}/lb of powder coating applied)(425 lb-powder/day)(365 days/yr)
= 1 lb/yr

3. Quarterly Emission Changes (QEC)

QECs are required for application emission profile in District's permit database. QECs are determined as follows: QEC (lb/qtr) = (PE2 – PE1) lb/yr ÷ 4 qtr/yr

Pollutant	Q1 (lb)	Q2 (lb)	Q3 (lb)	Q4 (lb)
PM_{10}	0	0	0	1

4. Adjusted Increase in Permitted Emissions (AIPE)

AIPE is used to determine if BACT is required for emission units that are being modified. The proposed equipment is new; therefore, AIPE calculations are not performed.

D. Facility Emissions

1. Pre-Project Stationary Source Potential to Emit (SSPE1)

Pursuant to Section 4.9 of District Rule 2201, SSPE1 is the Potential to Emit from all units with valid Authorities to Construct (ATC) or Permits to Operate (PTO) at the Stationary Source and the quantity of emission reduction credits (ERCs) which have been banked since September 19, 1991 for Actual Emissions Reductions (AERs) that have occurred at the source, and which have not been used on-site.

Permit #	PM_{10} (lb/yr)
N-3243-1-4	140*
N-3243-2-3	140*
ERC	0
SSPE1	280
Major Source Threshold	140,000
Major Source?	No

*PM_{10} emissions were determined using the information in the application review under project N-1030907.

2. Post-Project Stationary Source Potential to Emit (SSPE2)

Pursuant to Section 4.10 of District Rule 2201, the Post-Project Stationary Source Potential to Emit (SSPE2) is the Potential to Emit (PE) from all units with valid Authorities to Construct (ATC) or Permits to Operate (PTO) at the Stationary Source and the quantity of emission reduction credits (ERC) which have been banked since September 19, 1991 for Actual Emissions Reductions that have occurred at the source, and which have not been used on-site.

Permit Unit	PM_{10} (lb/yr)
N-3243-1-4	140
N-3243-2-3	140
N-3243-3-0	1
ERC	0
SSPE1	281
Offset Threshold Level	29,200
Offsets Triggered?	No
Major Source Threshold	140,000
Major Source?	No

3. Stationary Source Increase in Permitted Emissions (SSIPE)

It is District Practice to define SSIPE as the difference of SSPE2 and SSPE1. Negative SSIPE will be equated to zero.

Pollutant	SSPE2 (lb/yr)	SSPE1 (lb/yr)	SSIPE (lb/yr)
PM_{10}	281	280	1

4. SB 288 Major Modification

The purpose of Major Modification calculations is to determine the following:

A. If Best Available Control Technology (BACT) is triggered for a new or modified emission unit that results in a Major Modification (Rule 2201, §4.1.3); and

B. If a public notification is triggered (Rule 2201, §5.4.1).

Per section VII.D.2 of this document, this facility is not a Major Source for PM_{10}. Therefore, this project will not trigger an SB 288 Major Modification.

5. Federal Major Modification

The purpose of Federal Major Modification calculations is to determine the following:

A. If a Rule-compliance project qualifies for Rule 2201's Best Available Control Technology (BACT) and offset exemptions (Rule 2201, §4.2.3.5); and

B. If an Alternate Siting analysis must be performed (Rule 2201, §4.15.1);

C. If the applicant must provide certification that all California stationary sources owned, operated, or controlled by the applicant that are subject to emission limits are in compliance with those limits or are on a schedule for compliance with all applicable emission limits and standards; and

D. If a public notification is triggered (Rule 2201, §5.4.1).

Per section VII.D.2 of this document, this facility is not a Major Source for PM_{10}. Therefore, this project will not trigger a Federal Major Modification.

VIII. COMPLIANCE

Rule 2020 Exemptions

Since the uncontrolled emissions from the 0.455 MMBtu/hr natural gas-fired curing oven do not exceed 2.0 lb/day for any pollutant (see calculations below), it qualifies as a "low emitting unit" pursuant to section 3.8 of District Rule 2020. Furthermore, the risk management review analysis indicates that the can manufacturing operation (including the use of curing oven) does not pose any significant health risks to the nearest receptor. Therefore, the curing oven is exempt from permit requirements pursuant to section 6.19 and 6.19.2 of District Rule 2020.

Potential Emissions Calculations:
Assumptions:
No assumptions are made for the curing oven.

Emission Factors:

Pollutant	EF (lb/MMBtu)	Source
NO_x	0.10	AP-42 Table 1.4-1 (7/98)
SO_x	0.00285	District Policy 1720
PM_{10}	0.0076	AP-42 Table 1.4-2 (7/98)
CO	0.084	AP-42 Table 1.4-1 (7/98)
VOC	0.0055	AP-42 Table 1.4-2 (7/98)

Potential to Emit (PE):
PE = EF lb/MMBtu x 0.455 MMBtu/hr x 24 hr/day

Pollutant	EF (lb/MMBtu)	PE (lb/day)
NO_x	0.10	1.1
SO_x	0.00285	0.0
PM_{10}	0.0076	0.1
CO	0.084	0.9
VOC	0.0055	0.1

Rule 2201 New and Modified Stationary Source Review

1. Best Available Control Technology (BACT)

BACT requirements shall be triggered on a pollutant-by-pollutant basis and on an emissions unit-by-emissions unit basis. Unless exempted pursuant to Section 4.2, BACT shall be required for the following actions:

- Any new emissions unit or relocation from one Stationary Source to another of an existing emissions unit with a Potential to Emit (PE2) exceeding 2.0 pounds in any one day;
- Modifications to an existing emissions unit with a valid Permit to Operate resulting in an Adjusted Increase in Permitted Emissions (AIPE) exceeding 2.0 pounds in any one day;
- Any new or modified emissions unit, in a stationary source project, which results in a Major Modification, as defined in this rule.

The potential emissions from the proposed can manufacturing operation are not greater than 2.0 pounds per day for PM_{10}. Further, the project will not be a Major Modification (SB-288 or Federal). Therefore, BACT is not triggered for PM_{10}. Sections VII.C.2, VII.D.4, VII.D.5 are referenced to arrive at this conclusion.

2. Offsets

Per section VII.D.2 of this document, offsets are not triggered for PM_{10}.

3. Public Notification

District Rule 2201, section 5.4, requires a public notification for the affected pollutants from the following types of projects:

- New Major Sources

- SB 288 Major Modification
- Federal Major Modification
- New emission units with a PE>100 lb/day of any one pollutant
- Modifications with SSPE1 below an Offset threshold and SSPE2 above an Offset threshold on a pollutant-by-pollutant basis
- New stationary sources with SSPE2 exceeding Offset thresholds
- Any permitting action with a SSIPE exceeding 20,000 lb/yr for any one pollutant

This project is not in exceedance of the thresholds specified in any of the above items. Therefore, public notice is not required for this project.

4. Daily Emission Limits (DELs)

The daily emissions limitations (DELs) and other enforceable conditions are required by Section 3.17 to restrict a unit's maximum daily emissions. The following DELs will be placed on the permit:

- The quantity of powder coating applied shall not exceed 425 pounds in any one day. [District Rule 2201]

- The PM_{10} emissions from the inside seam stripe applicator shall not exceed 8.2E-06 pounds per pound of powder coating applied. [District Rule 2201]

5. Compliance Assurance

Source Testing
In accordance with the District Policy APR 1705 (10/09/97) -"Notwithstanding the provisions of Section II of this policy, except when mandated by an applicable requirement, annual source testing for PM_{10}, SO_x, VOC, NO_x, and CO emissions should not be required if the uncontrolled emissions from the unit is less than 30 pound per day for that pollutant".

The uncontrolled PM_{10} emissions from the proposed side seam powder coating operation are 0.3 pounds per day[1], which is less than 30 pounds per day threshold mentioned above. Therefore, initial and annual source testing is not considered for the proposed operation.

Monitoring
No monitoring is required.

[1] $PE_{uncontrolled}$ = (8.2E-06 lb-PM10/lb-powder applied)(425 lb-powder/day) + (1-0.99)
= 0.3 lb-PM_{10}/day

Recordkeeping
The permittee is required to keep records of the amount of powder coating material applied on a daily basis. These records are required to be kept for a period of at least 5 years.

Reporting
Reporting is not required.

Compliance is expected with this Rule.

Rule 2520 Federally Mandated Operating Permits

Silgan Containers possesses a Title V permit. The proposed project is considered a Minor Modification to the Title V permit. The following conditions will be included in the permit:

- This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule]

- Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4]

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

- A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs and

- The source's suggested draft permit (Appendix I of this document) and

- Certification by a responsible official that the proposed modification meets the criteria for use of major permit modification procedures and a request that such procedures be used (Appendix III of this document).

Section 5.3.4 of this rule requires the permittee shall file an application for administrative permit amendments prior to implementing the requested change except when allowed by the operational flexibility provisions of section 6.4 of this rule. Silgan Containers is expected to notify the District by filing TV Form-008 upon implementing the ATC. The District Compliance Division is expected to submit a change order to implement ATC into Permit to Operate.

Compliance is expected with this Rule.

Rule 4001 New Source Performance Standards

40 CFR Part 60 Subpart WW—Standards of Performance for the Beverage Can Surface Coating Industry
Section 60.491 (a)(1) defines "beverage can" as any two-piece steel or aluminum container in which soft drinks or beer, including malt liquor, are packaged. The definition does not include containers in which fruit or vegetable juices are packaged.

Silgan containers do not make beverage cans as defined in the above paragraph. Therefore, this subpart does not apply.

40 CFR Part 60 Subpart TT—Standards of Performance for Metal Coil Surface Coating
Section 60.461(a) defines "metal coil surface coating operation" as the application system used to apply an organic coating to the surface of any continuous metal strip with thickness of 0.15 millimeter (mm) (0.006 in.) or more that is packaged in a roll or coil.

The proposed equipment will be utilized to apply coating to individual can bodies. Since the coatings will not be applied to continuous metal strips that are packaged in a roll or coil, this subpart does not apply.

Rule 4002 National Emissions Standards for Hazardous Air Pollutants

40 CFR Part 63 Subpart KKKK—National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Cans
Per section 63.3481(b), this subpart applies to metal can surface coating facilities that utilize more than 1,500 gallon per year in the source category defined in paragraph (a) of this section and that is a major source, is located at a major source, or is part of a major source of emissions of hazardous air pollutants (HAP). A major source of HAP emissions is any stationary source or group of stationary sources located within a contiguous area and under common control that emits or has the potential to emit, considering controls, any single HAP at a rate of 10 tons or more per year or any combination of HAP at a rate of 25 tons or more per year.

The calculations in Appendix II of this document indicate that single HAP emissions are less than 10 tons per year, and the combined HAP emissions are less than 25 tons per year from this site. Thus, this facility is not a Major HAP source and this subpart does not apply.

Rule 4101 Visible Emissions

Section 5.0, indicates that 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 dark or darker than Ringlemann 1 or equivalent to 20% opacity. The following condition will be placed on the permit:

- 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]

Compliance is expected with this Rule.

Rule 4102 Nuisance

Section 4.0 prohibits discharge of air contaminants, which could cause injury, detriment, nuisance or annoyance to the public. The following condition will be placed on the permit:

- No air contaminant shall be released into the atmosphere, which causes a public nuisance. [District Rule 4102]

California Health & Safety Code 41700 - Health Risk Assessment

District Policy APR 1905 - Risk Management Policy for Permitting New and Modified Sources specifies that for an increase in emissions associated with a proposed new source or modification, the District perform an analysis to determine the possible impact to the nearest resident or worksite. The Risk Management Review (RMR) results are summarized in the following table:

Categories	New can manufacturing line (Unit 3-0)	Project Totals	Facility Totals
Prioritization Score	0.01*	0.01	0.01
Acute Hazard Index	NA	NA	NA
Chronic Hazard Index	NA	NA	NA
Maximum Individual Cancer Risk	NA	NA	NA
T-BACT Required?	No		
Special Permit Conditions?	No		

The prioritization score for this project is not above 1.0. In accordance with the District's Risk Management Policy, the project is approved without Toxic Best Available Control Technology (T-BACT).

Compliance is expected with this Rule.

Rule 4201 Particulate Matter Concentration

Section 3.0 prohibits discharge of dust, fumes, or total particulate matter into the atmosphere from any single source operation in excess of 0.1 grain per dry standard cubic foot.

The particulate matter concentration was estimated to be 0.0002 grains per dry standard cubic foot for an identical powder coating application equipment under project C1063325. Therefore, compliance is expected with this rule.

Rule 4202 Particulate Matter Emission Rate

Section 4.0 of this rule, a person shall not discharge into the atmosphere from any one source operation PM emissions in excess of the maximum allowable limit (E_{max}), in lb/hr, determined by the following equation:

$E_{max} = 3.59\ P^{0.62}$, for Process weight (P) less than or equal to 30 tons/hr

P = (425 lb/day)/(2,000 lb/ton x 24 hr/day)
= 0.0089 tons/hr

$E_{max} = 3.59 \times (0.0089)^{0.62}$
= 0.19 lb-PM/hr

$E_{Proposed}$ = (8.2×10^{-6} lb-PM_{10}/lb-powder x 425 lb-powder/day)/(1 lb-PM_{10}/lb-PM x 24 hr/day)
= 0.00 lb-PM/hr

Since the proposed PM emission rate (Eproposed) is less than the allowable maximum emission rate (Emax), compliance is expected with this rule.

Rule 4604 Can and Coil Coating Operations

This rule applies to can and coil coating operations, and to organic solvent cleaning, storage and disposal associated with can and coil coating operations.

Section 5.1, Table 2, requires side seam coating three piece can coating operations to comply with VOC content limit of 660 g/l, less water and exempt compounds.

Silgan Containers has proposed to use powder coatings that do not contain any VOC. Thus, compliance is expected with the required limit.

Section 5.4, Table 5, lists organic solvent cleaning requirements including VOC limits for product cleaning, repair and maintenance cleaning, and cleaning of coating application equipment.

Silgan Containers is not planning to use any VOC containing solvent to clean-up product or coating application equipment. Therefore, no further discussion is necessary.

Section 5.6 requires that coatings shall be applied with properly operating coating application equipment, the coating application equipment shall be operated per operating procedures specified by the equipment manufacturer, and the coatings shall be applied using one of the following methods which include electrostatic application, flow coater, roll coater, dip coater, hand application methods, HVLP spray, and any other application method that demonstrates, to the satisfaction of the APCO and EPA, a coating transfer efficiency of at least 65 percent (≥ 65%) as measured using a test method pursuant to Section 6.7.4.

The proposed equipment will be required to be installed, operated and maintained in accordance with manufacturer's recommendations. This equipment is designed to utilize electrostatic application method to apply the powder coatings. Therefore, compliance is expected with this section.

Section 6.0 lists administrative requirements including coating use records, solvent use records, VOC emission control system records and its maintenance plan, and various test methods.

Silgan containers is required to keep daily records of powder coatings applied and the MSDS of such coatings. These records are required to be kept for a period of at least five years. Thus, compliance is expected with this section.

California Environmental Quality Act (CEQA)

The California Environmental Quality Act (CEQA) requires each public agency to adopt objectives, criteria, and specific procedures consistent with CEQA Statutes and the CEQA Guidelines for administering its responsibilities under CEQA, including the orderly evaluation of projects and preparation of environmental documents. The San Joaquin Valley Unified Air Pollution Control District (District) adopted its *Environmental Review Guidelines* (ERG) in 2001. The basic purposes of CEQA are to:

- Inform governmental decision-makers and the public about the potential, significant environmental effects of proposed activities.
- Identify the ways that environmental damage can be avoided or significantly reduced.
- Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible.
- Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

The District performed an Engineering Evaluation (this document) for the proposed project and determined that none of the proposed emission units triggers Best Available Control Technology (BACT) requirements. Furthermore, the District conducted a Risk Management Review and concludes that potential

health impacts are less than significant from the proposed emission units. Therefore, this project does not require discretionary judgment or deliberation. Consequently, this permitting action constitutes a ministerial approval. Section 21080 of the Public Resources Code exempts CEQA for those projects over which a public agency exercises only ministerial approval; therefore, the District finds that this project to be exempt from the provisions of CEQA.

IX. RECOMMENDATION

Issue the Authority to Construct N-3243-3-0 upon addressing any comments from the EPA and the applicant.

X. BILLING INFORMATION

Permit#	Fee Schedule	Description	Previous Fee Schedule
N-3243-3-0	3020-01 E	203 hp, electric	None

APPENDICES
Appendix I: Draft Authority to Construct Permit
Appendix II: HAP Emission Calculations
Appendix III: TV Form 009

Appendix I
Draft Authority to Construct Permit

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT

PERMIT NO: N-3243-3-0

ISSUANCE DATE: DRAFT

LEGAL OWNER OR OPERATOR: SILGAN CONTAINERS MFR. CORP.
MAILING ADDRESS: 4210 YOSEMITE BLVD
MODESTO, CA 95357

LOCATION: 4000 YOSEMITE BLVD
MODESTO, CA 95357-7798

EQUIPMENT DESCRIPTION:
CAN SIDE STRIPE COATING LINE #3 WITH A SOUDRONIC FBB 1080 BODY MAKER, A SOUDRONIC P-120-U SIDE STRIPE APPLICATION UNIT AND A PERMIT EXEMPT CURING OVEN

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
5. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
6. The permittee shall install, operate, and maintain the inside seam stripe applicator system in accordance with the manufacturer's recommendations. [District Rules 2201 and 4604] Federally Enforceable Through Title V Permit
7. A spare set of filters of each type for the inside seam stripe applicator system shall be maintained on site. [District Rule 2201] Federally Enforceable Through Title V Permit

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

DRAFT

DAVID WARNER, Director of Permit Services
N-3243-3-0 : Feb 6 2012 8:36AM – KAHLONJ , Joint Inspection NOT Required

8. No VOC-containing powder coatings shall be used on this unit. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The quantity of powder coating applied shall not exceed 425 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The PM10 emissions from the inside seam stripe applicator shall not exceed 8.2E-06 pounds per pound of powder coating applied. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Daily records of the quantity of powder coating applied, in pounds, shall be maintained on site. [District Rules 2201 and 4604] Federally Enforceable Through Title V Permit
12. The permittee shall keep manufacturer's product data sheet or Material Safety Data Sheet of the powder coating used on site. [District Rules 2201 and 4604] Federally Enforceable Through Title V Permit
13. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070, 2201 and 4604] Federally Enforceable Through Title V Permit

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Appendix II
HAP Emission Calculations

HAP Emission Calculations

The facility utilizes two liquid strip materials (Valspar 9790014 and PPG 2238862) and is limited to 49,999 lb/yr of VOC emissions. The powder coating line utilize zero VOC materials, therefore, all of the VOC would be from the liquid coating lines.

To ensure the worst-case HAP emissions allowed by the Permits to Operate are estimated, the potential HAP emissions from each material will be determined assuming it causes the entire 49,999 lb VOC/yr to be emitted.

Since this determination is being conducted to determine whether or not the facility is subject to 40 CFR Part 63 Subpart KKKK, which is a Federal rule, only the Federal Clean Air Act Amendment (CAAA) pollutants will be included.

Valspar 9790014:

Annual VOC Limit:	49,999 lb
Valspar 9790014 VOC Content:	4.96 lb/gal
Material Density:	8.58 lb/gal

Maximum Usage = [(49,999 lb-VOC/yr)/(4.96 lb-VOC/gal)](8.58 lb/gal)
= 86,490 lb-material/yr

The following table shows the maximum material usage, the HAP contents (from the material safety data sheets in the project file) and the potential HAP emissions.

CAAA HAP*	HAP % by wt.	Annual Usage (lb)	PE (lb/yr)
2-(2-butoxyethoxy) ethanol	6.30	86,490	5,449
Xylene	5.40		4,670
Ethylbenzene	1.10		951
Methyl isobutyl ketone	1.00		865
Toluene	0.10		86
Formaldehyde	0.020		17
Total			12,038

*MSDS list the chemicals as CAAA HAP.

PPG 2238862:

Annual VOC Limit:	49,999 lb
Valspar 9790014 VOC Content:	4.66 lb/gal
Material Density:	8.55 lb/gal

Maximum Usage = [(49,999 lb-VOC/yr)/(4.66 lb-VOC/gal)](8.55 lb/gal)
= 91,736 lb-material/yr

The following table shows the maximum material usage, the HAP contents (from the material safety data sheet in the project file) and the potential HAP emissions.

CAAA HAP	HAP % by wt.	Annual Usage (lb)	PE (lb/yr)
Xylene	6.80	91,736	6,238
Ethylbenzene	1.60		1,468
Formaldehyde	0.30		275
Total			7,981

From the above tables, the potential to emit of no single HAP is 10 tons/yr or more and the combined potential to emit of all HAPs is not 25 tons/yr or more. Therefore, the facility is not a major HAP source.

Appendix III
TV Form 009

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SJVAPCD NORTHERN REGION

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
[X] MINOR PERMIT MODIFICATION
[ ] ADMINISTRATIVE AMENDMENT

COMPANY NAME: Silgan Containers Mfg. Corp.	FACILITY ID: N- 3243
1. Type of Organization: [X] Corporation [ ] Sole Ownership [ ] Government [ ] Partnership [ ] Utility	
2. Owner's Name: Silgan Containers Mfg. Corp.	
3. Agent to the Owner: Area Manager, Dave Rex	

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

(DR) 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).

(DR) 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.

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

(DR) Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

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

Signature of Responsible Official — Date: 11-9-2011

Dave Rex

Name of Responsible Official (please print)

Area Manager

Title of Responsible Official (please print)

Mailing Address: Central Regional Office * 1990 E. Gettysburg Avenue * Fresno, California 93726-0244 * (559) 230-5900 * FAX (559) 230-6061