



MAR 22 2011

Gerardo C. Rios, Chief
Permits Office (AIR-3)
U.S. EPA - Region IX
75 Hawthorne St
San Francisco, CA 94105

**Re: Notice of Final Action - Minor Title V Permit Modification
District Facility # N-2174
Project # N-1091432**

Dear Mr. Rios:

The Air Pollution Control Officer has modified the Title V permit for Silgan Containers MFR Corp by incorporating Authority to Construct N-2174-24-6. This project is for the modification of a tank to increase the true vapor pressure limit and to install a carbon adsorption emission control device.

Enclosed is the modified Title V permit. The application and proposal were sent to US EPA Region IX on December 21, 2010. No comments were received following the District's preliminary decision on this project.

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

Sincerely,

David Warner
Director of Permit Services

DW:JH/st

Enclosures

Seyed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-8475

Central Region (Main Office)
1990 E. Gettysburg Avenue
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Bakersfield, CA 93308-9725
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MAR 22 2011

Bob Bennett
Silgan Containers MFR Corp
3250 Patterson Road
Riverbank, CA 95367

**Re: Notice of Final Action - Minor Title V Permit Modification
District Facility # N-2174
Project # N-1091432**

Dear Mr. Bennett:

The Air Pollution Control Officer has modified the Title V permit for Silgan Containers MFR Corp by incorporating Authority to Construct N-2174-24-6. This project is for the modification of a tank to increase the true vapor pressure limit and to install a carbon adsorption emission control device.

Enclosed is the modified Title V permit. The application and proposal were sent to US EPA Region IX on December 21, 2010. No comments were received following the District's preliminary decision on this project.

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

Sincerely,

David Warner
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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-2174-24-7

EXPIRATION DATE: 09/30/2007

EQUIPMENT DESCRIPTION:

ONE 5,000 GALLON FIXED ROOF STORAGE TANK (TANK HW) FOR WASTE COATINGS AND SOLVENTS WITH ALL TANK VAPORS CONTROLLED BY TWO 200 LB US FILTER MODEL VSC200 CARBON ABSORPTION FILTERS IN SERIES

PERMIT UNIT REQUIREMENTS

1. The storage tank shall be equipped with a pressure-vacuum (PV) relief valve shall be set to within 10% of the maximum allowable working pressure of the tank, permanently labeled with the operating pressure settings, properly maintained in good operating order in accordance with the manufacturer's instructions, and shall remain in gas-tight condition except when the operating pressure exceeds the valve's set pressure. [District NSR Rule and Rule 4623, 5.2] Federally Enforceable Through Title V Permit
2. Only waste coatings and solvents shall be stored in this tank. [District NSR Rule] Federally Enforceable Through Title V Permit
3. The VOC control efficiency of the carbon absorption system shall be 90% or greater. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The maximum throughput shall not exceed 5,000 gallons in any one day and 60,000 gallons in any one calendar year. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Controlled emissions from the tank, served by the carbon absorption system, shall not exceed 7.7 lb-VOC/day or 200 lb-VOC/year. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The true vapor pressure (TVP) of the organic liquid stored in the tank shall be less than 11 psia at the actual storage temperature of the tank contents. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The operator shall determine the true vapor pressure of the organic liquid stored in the tank at least once per year in accordance with methods described in 40 CFR 60.113 and section 6.2 of District Rule 4623 (amended 5/19/05). Determinations shall be made annually during the summer and whenever there is a change in the source or type of the hazardous waste liquid entering the tank. [District Rules 2201 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
8. The TVP testing shall be conducted at actual storage temperature of the organic liquid in the tank. [District Rule 2201] Federally Enforceable Through Title V Permit
9. For organic liquids, the true vapor pressure (TVP) shall be measured using Reid vapor pressure ASTM Method D323, and converting the RVP to TVP at the tank's maximum organic liquid storage temperature. The conversion of RVP to TVP shall be done in accordance of the oil and gas section of "California Air Resources Boards (ARB) Technical Guidance Document to the Criteria and Guidelines Regulations for AB 2588", dated August 1989. Alternate methods of determining the true vapor pressure may be utilized if prior approval is obtained from the District and EPA. [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 keep and shall submit records of TVP testing conducted in accordance with the requirements of District Rule 4623 Section 6.2 to the APCO within 45 days after the date of testing. The records shall include the tank identification number, Permit to Operate number, TVP of the stored organic liquid, test methods used, ambient temperature at the time the test was conducted, and a copy of the test results. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The operator shall perform monthly monitoring of all components associated with the waste solvent tank system using a photo ionization detector (or equivalent). The monitoring shall be conducted in accordance with EPA Method 21 and shall include the sampling point between the primary and back-up carbon canisters. The primary canister shall be replaced when measurable levels of VOC emissions are detected at the sampling point between the primary and back-up carbon canisters. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The carbon canisters removed from the system shall be sealed vapor tight. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Records shall be maintained of all maintenance activities for the carbon canister system. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The operator shall keep a record of the daily amount of material loaded into the tank and the cumulative annual amount of material loaded into the tank. [District NSR Rule] Federally Enforceable Through Title V Permit
15. 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 Rule 1070] Federally Enforceable Through Title V Permit

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