



MAR 25 2013

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-1123586**

Dear Mr. Rios:

The Air Pollution Control Officer has modified the Title V permit for Silgan Containers MFG Corp by incorporating Authority to Construct N-2174-8-12. This project is for the modification of a 3-piece can sheet coater to modify the unit by adding a permanent total enclosure.

Enclosed is the modified Title V permit. The application and proposal were sent to US EPA Region IX on February 25, 2013. 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. Rupj Gill, Permit Services Manager, at (209) 557-6400.

Sincerely,

David Warner
Director of Permit Services

DW:JH

Enclosures

Seyed Sadredin
Executive Director/Air Pollution Control Officer

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

Central Region (Main Office)
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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-2174-8-13

EXPIRATION DATE: 09/30/2015

EQUIPMENT DESCRIPTION:

SHEET COATING LINE (COATING LINE #4) WITH A PERMANENT TOTAL ENCLOSURE (PTE) AND AN AFTERBURNER EXHAUST GAS HEATED CURING TUNNEL, ALL SERVED BY A 9 MMBTU/HR NATURAL GAS FIRED SMITH ENGINEERING AFTERBURNER. THE COATING SYSTEM UTILIZED MAY BE EITHER A WAGNER TWO ROLLER AND A WAGNER SOLVENT FLOOD SYSTEM OR AN ANILOX SINGLE-ROLLER AND A HANESWOOD SOLVENTLESS SCRAPER SYSTEM

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 gr/dscf in concentration at the point of discharge. [District Rule 4201] Federally Enforceable Through Title V Permit
2. This unit shall not be used for metal coil surface coating. [District Rule 2520, 9.1 and 40 CFR Part 60 Subpart TT] Federally Enforceable Through Title V Permit
3. This unit shall not be used in soft drink or beer (including malt liquor) can manufacturing operations. This prohibition does not apply to coating of containers in which fruit or vegetable juices are packaged. [District Rule 2520, 9.1 and 40 CFR Part 60 Subpart WW] Federally Enforceable Through Title V Permit
4. Sulfur compound emissions shall not exceed 0.2% by volume calculated as SO₂ averaged over 15 minutes. [District Rule 4801 and Stanislaus County Rule 407] Federally Enforceable Through Title V Permit
5. The afterburner shall be preheated to at least 1,400 degree F prior to start-up of the sheet coating line. [District Rule 4604, 5.2.2 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
6. 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 1,400 degree F. [District Rule 4604, 5.2.6 & 6.4, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
7. An excursion is deemed to occur when the afterburner temperature drops below the minimum operating temperature of 1,400 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, 6.4.2 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
8. VOC emissions from this operation shall be controlled by a VOC emission 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, Sections 5.1 and 5.4 (9/20/07). [District Rule 4604, 5.2.2 & 5.2.3] Federally Enforceable Through Title V Permit
9. VOC emissions due to the application of sheet coatings and clean-up solvents shall not exceed 892.7 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The annual VOC emissions shall not exceed 40,500 pounds based on a 12 month rolling total. [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. Emissions due to the natural gas fired afterburner shall not exceed any of the following: 0.00285 lb-SO_x/MMBtu, 0.1 lb-NO_x/MMBtu, 0.084 lb-CO/MMBtu, 0.0055 lb-VOC/MMBtu, and 0.0076 lb-PM₁₀/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
12. 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, 5.4.1]
13. 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, 5.4.4 & 5.4.7] Federally Enforceable Through Title V Permit
14. 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 section 5.4.4.2 of Rule 4604 (9/20/07). [District Rule 4604, 5.4.5] Federally Enforceable Through Title V Permit
15. 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, 5.4.6] Federally Enforceable Through Title V Permit
16. 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, 5.5] Federally Enforceable Through Title V Permit
17. 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 Section 6.7.4 of Rule 4604 (9/20/07). All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4604, 5.6.2 & 6.7.4] Federally Enforceable Through Title V Permit
18. 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, 6.2.1] Federally Enforceable Through Title V Permit
19. 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, 6.3.1] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
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20. 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 Section 6.5 of Rule 4604 (9/20/07). [District Rule 4604, 5.2.7 & 6.5] Federally Enforceable Through Title V Permit
21. The operator shall source test the afterburner to determine the control efficiency of the afterburner at least once every twelve (12) months. [District Rules 1081 and 4604, 5.2.8.3.1]
22. Source testing for VOC control efficiency of the 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, 5.2.8.3.2] Federally Enforceable Through Title V Permit
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 Rules 1081 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
24. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rules 1081 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
25. 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 Rules 1081 and 4604, 6.7.2.1] Federally Enforceable Through Title V Permit
26. 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 Rules 1081 and 4604, 6.7.2.2] Federally Enforceable Through Title V Permit
27. 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, 6.7.2.3] Federally Enforceable Through Title V Permit
28. 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, Section 3.0 (9/20/07). 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 Rules 2520, 9.3.2 and 4604, 6.7.1] Federally Enforceable Through Title V Permit
29. 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, Section 3.0 (9/20/07). 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 Rules 2520, 9.3.2 and 4604, 6.7.1] Federally Enforceable Through Title V Permit
30. 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, 6.2.2. and 6.2.3] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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31. 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, 6.3.2 and 6.3.3] Federally Enforceable Through Title V Permit
32. Permittee shall maintain daily records of key system operating parameters which will demonstrate continuous operation and compliance of the emission control system during periods of emission-producing activities. [District Rule 4604, 6.4.1] Federally Enforceable Through Title V Permit
33. Permittee shall keep a record of the rolling 12-month VOC emissions from this operation. This record shall be updated on at least a monthly basis. [District Rule 1070]
34. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR Part 64.7. [40 CFR Part 64.7] Federally Enforceable Through Title V Permit
35. 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 64.8] Federally Enforceable Through Title V Permit
36. The permittee shall comply with the record keeping and reporting requirements of 40 CFR Part 64.9. [40 CFR Part 64.9] Federally Enforceable Through Title V Permit
37. 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, 9.4.2, and 4604, 6.2.5, 6.3.5, & 6.4.3] Federally Enforceable Through Title V Permit
38. Compliance with permit conditions in the Title V permit shall be deemed compliance with the requirements of SJVAPCD Rules 4201 (as amended December 17, 1992) for curing oven emissions only and 4604 (as amended September 20, 2007). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
39. The requirements of SJVAPCD Rule 4661 (as amended September 20, 2007) , does not apply to this permit unit because it is subject to District Rule 4604 (as amended September 20, 2007). A permit shield is granted from these requirements. [District Rules 2520, 13.2] Federally Enforceable Through Title V Permit
40. The requirements of 40 CFR Part 60 Subparts TT and WW do not apply to this permit unit because this unit does not coat beverage cans or metal coils. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

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