

March 29, 2004

Ms. Deborah Jordan, Director
Air Management Division
United States Environmental Protection Agency
75 Hawthorne Street
San Francisco, CA 94105

Dear Ms. Jordan:

The District is proposing to reopen the following Major Facility Review permit:

Facility #	Facility Name	Address, City	Type of Operation
A0273	Pechiney Plastic Packaging, Inc.	6590 Central Avenue Newark, CA 94560	Flexible Packaging

ALAMEDA COUNTY

Roberta Cooper
Scott Haggerty
(Chairperson)
Nate Miley
Shelia Young

CONTRA COSTA COUNTY

Mark DeSaulnier
Mark Ross
Gayle Uilkema
(Secretary)

MARIN COUNTY

Harold C. Brown, Jr.

NAPA COUNTY

Brad Wagenknecht

SAN FRANCISCO COUNTY

Willie Brown, Jr.
Chris Daly
Jake McGoldrick

SAN MATEO COUNTY

Jerry Hill
Marland Townsend
(Vice-Chairperson)

SANTA CLARA COUNTY

Liz Kniss
Julia Miller
Dena Mossar
(Vacant)

SOLANO COUNTY

John F. Silva

SONOMA COUNTY

Tim Smith
Pamela Torliatt

Jack P. Broadbent
**EXECUTIVE
OFFICER/APCO**

The purpose of the reopening is to: 1) To clarify the protocol to be followed for the annual testing of catalytic oxidizers, 2) to delete maximum capacity limits that were recently added but that are not an appropriate measurement of maximum capacity, 3) to clarify daily recordkeeping requirements, 4) to delete references to the EPA MACT standard in Condition #20229, because the condition is a synthetic minor condition, and 5) various non-substantive clarifications and corrections.

The permit was originally issued on November 6, 2001. A significant revision to the permit was issued on May 6, 2003. On June 5, 2003, the facility appealed to the revision to the District Hearing Board. The appeal was assigned Docket No. 3430. Settlement negotiations followed and as an outcome of those negotiations, the District has decided that certain changes and clarifications to the permit are appropriate. Today's proposal would implement these changes.

The District is not sending a separate notice of reopening to the facility pursuant to BAAQMD Regulation 2-6-415 because the District presumes that the facility's engagement in negotiations regarding the appeal and the resulting agreement to amend the permit constitute notice of reopening.

The District is inviting public comment on the proposed changes to the permit. The District is also submitting the permit to EPA for a 45-day review period. After considering all comments to the proposed permit, the District plans to issue the revised permit. The notice inviting written public comment will be published in the Inter-City Express. The final date for comments is May 10, 2004.

Enclosed for your information is a copy of the proposed permit and the letter to the facility. The letter to the facility will serve as the Statement of Basis for the reopening. If you have any questions regarding this project, please call Steve Hill, at (415) 749-4673, fax (415) 749-5130.

Sincerely,

Jack P. Broadbent
Executive Officer/Air Pollution Control Officer

SAH:BFC:myl
Enclosures

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