

24. The PM10 emission concentration from the thermal oxidizer shall not exceed 0.0076 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
25. 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) 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 allowed 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, 6.7.1.1] Federally Enforceable Through Title V Permit
26. 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 allowed 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, 6.7.1.2] Federally Enforceable Through Title V Permit
27. The operator shall source test each collection device to determine the capture efficiency at least once five years. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
28. The capture efficiency of VOC emission collection devices 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 APCO. [District Rules 2520, 9.3.2 and 4604, 6.7.2.1] Federally Enforceable Through Title V Permit
29. The operator shall source test the thermal oxidizer at least once every twelve (12) months to demonstrate compliance with the VOC control efficiency requirements. [District Rule 2201] Federally Enforceable Through Title V Permit
30. The control efficiency of VOC emission control device(s) 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. [District Rule 4604, 6.7.2.2] Federally Enforceable Through Title V Permit
31. Source testing of the capture efficiency and control efficiency of VOC emission collection and control devices shall be performed under conditions representative of normal operating conditions and under conditions specified in the Permit-To-Operate. [District Rules 1081 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
32. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
33. 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
34. A list of the coatings, catalysts and reducers used, the mix ratio of the components used, the VOC content of each coating used (as applied) and of the VOC content of each solvent used for clean-up and surface preparation shall be kept. The list shall be made available to the District upon request. [District Rules 2520, 9.3.2 and 4604, 6.1, 6.2] 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. Daily records of the following shall be kept: (a) The specific coatings used and the mix ratio of the components added to the coatings prior to application; (b) The volume of each coating used in gallons; (c) The specific solvent used for clean-up and surface preparation; (d) The volume of each solvent used; (e) The VOC emissions due to coating and solvent usage from this permit unit; (f). The combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, N-2253-21 and N-2253-22; (g). The operating temperature of the thermal oxidizer. [District Rules 1070, 2520, 9.3.2 and 4604, 6.1, 6.2 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
36. Records of the date, the time period and the reason that the thermal oxidizer is out of service shall be kept. [District NSR Rule, Rules 2520, 9.3.2, 4604, 5.2.2, 6.3 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
37. Records of the combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, N-2253-21, and N-2253-22 shall be kept for any consecutive 12-month period. [District Rules 2201 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
38. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 4604, 6.2, 6.3, and 6.4] Federally Enforceable Through Title V Permit

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# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-2253-3-7

**EXPIRATION DATE:** 10/31/2015

**EQUIPMENT DESCRIPTION:**

SIDE SEAM STRIPE SPRAY OPERATION (LINE #3) SERVED BY ONE SOUDRONIC MODEL FBB BODYMAKER AND ONE 0.6 MMBTU/HR FLYNN AERO FLAME AF-9 CURING TUNNEL. THE FUME HOOD (OVER THE COATING APPLICATOR AND CONVEYOR) AND CURING TUNNEL IS VENTED TO THE SHARED THERMAL OXIDIZER

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] 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. The VOC contaminated air stream from the side seam stripe coater, conveyor between the coater and curing tunnel, and curing tunnel shall be vented to the thermal oxidizer at all times except when the thermal oxidizer is undergoing maintenance. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The collection system for fugitive VOC emissions from the side seam stripe coater, conveyor between the coater and curing tunnel, and curing tunnel shall have a minimum overall capture efficiency of 71%. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The thermal oxidizer shall be maintained at a minimum temperature of 1,490 Degrees F to provide at least 98.5% VOC control. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The thermal oxidizer shall be equipped with a continuous temperature monitoring and recording device. [District NSR Rule, Rules 2520, 9.3.2, 4604, 6.3 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
7. The overall VOC capture and control efficiency shall be calculated by multiplying the percent VOC capture efficiency of the collection system by the percent VOC control efficiency of the thermal oxidizer and divide by 100. [District NSR Rule and Rule 4604, 6.7.2.3] Federally Enforceable Through Title V Permit
8. Three-piece can side seam spray operations shall not use or apply any coating with a VOC content in excess of 660 grams of VOC per liter of coating, as applied, excluding water and exempt compounds. [District Rule 4604, 5.1] Federally Enforceable Through Title V Permit
9. 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): product cleaning during manufacturing process or surface preparation for coating application: 25 g/l (0.21 lb/gal), repair and maintenance cleaning: 25 g/l (0.21 lb/gal), cleaning of coating application equipment except sheet coater for three-piece cans: 25 g/l (0.21 lb/gal), cleaning of sheet coater for three-piece cans: 550 g/l (4.6 lb/gal) until 9/30/2011 and 250 g/l (2.3 lb/gal) on and after 10/1/2011. [District Rule 4604, 5.4] 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. For cleaning of coating application equipment used for sheet coating of three-piece cans, cleaning activities that are performed outside the control of an APCO-approved emission control system that meets the requirements of District Rule 4604 (9/20/07) using 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. [District Rule 4604, 5.4] Federally Enforceable Through Title V Permit
11. 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
12. Permittee shall not use VOC-containing materials 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
13. An operator 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
14. Only electrostatic, flow, roll, dip, hand application, HVLP, or other application methods with a coating transfer efficiency of at least 65% shall be used. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4604, 5.6.2]
15. Coating transfer efficiency shall be measured using a test method pursuant to Section 6.7.4 of Rule 4604 (9/20/07). [District Rule 4604, 5.6.2.7] Federally Enforceable Through Title V Permit
16. The VOC emissions due to coating and solvent usage (from this permit unit) shall not exceed 250 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
17. The PM10 emissions due to coating and solvent usage (from this permit unit) shall not exceed 0.4 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
18. The combined daily VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, and N-2253-21 shall not exceed 250 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
19. The combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, N-2253-21, and N-2253-22 shall not exceed 58,579 pounds during any consecutive 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
20. The NOx emission concentration from the thermal oxidizer shall not exceed 0.098 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
21. The CO emission concentration from the thermal oxidizer shall not exceed 0.082 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
22. The VOC emission concentration from the thermal oxidizer shall not exceed 0.005 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
23. The SOx emission concentration from the thermal oxidizer shall not exceed 0.00285 lb/MMBtu of natural gas consumption. [District NSR Rule and Rule 4801, 3.1]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

24. The PM10 emission concentration from the thermal oxidizer shall not exceed 0.0076 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
25. 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) 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 allowed 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, 6.7.1.1] Federally Enforceable Through Title V Permit
26. 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 allowed 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, 6.7.1.2] Federally Enforceable Through Title V Permit
27. The operator shall source test each collection device to determine the capture efficiency at least once five years. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
28. The capture efficiency of VOC emission collection devices 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 APCO. [District Rules 2520, 9.3.2 and 4604, 6.7.2.1] Federally Enforceable Through Title V Permit
29. The operator shall source test the thermal oxidizer at least once every twelve (12) months to demonstrate compliance with the VOC control efficiency requirements. [District Rule 2201] Federally Enforceable Through Title V Permit
30. The control efficiency of VOC emission control device(s) 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. [District Rule 4604, 6.7.2.2] Federally Enforceable Through Title V Permit
31. Source testing of the capture efficiency and control efficiency of VOC emission collection and control devices shall be performed under conditions representative of normal operating conditions and under conditions specified in the Permit-To-Operate. [District Rules 1081 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
32. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
33. 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
34. A list of the coatings, catalysts and reducers used, the mix ratio of the components used, the VOC content of each coating used (as applied) and of the VOC content of each solvent used for clean-up and surface preparation shall be kept. The list shall be made available to the District upon request. [District Rules 2520, 9.3.2 and 4604, 6.1, 6.2] 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. Daily records of the following shall be kept: (a) The specific coatings used and the mix ratio of the components added to the coatings prior to application; (b) The volume of each coating used in gallons; (c) The specific solvent used for clean-up and surface preparation; (d) The volume of each solvent used; (e) The VOC emissions due to coating and solvent usage from this permit unit; (f). The combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, N-2253-21 and N-2253-22; (g). The operating temperature of the thermal oxidizer. [District Rules 1070, 2520, 9.3.2 and 4604, 6.1, 6.2 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
36. Records of the date, the time period and the reason that the thermal oxidizer is out of service shall be kept. [District NSR Rule, Rules 2520, 9.3.2, 4604, 5.2.2, 6.3 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
37. Records of the combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, N-2253-21, and N-2253-22 shall be kept for any consecutive 12-month period. [District Rules 2201 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
38. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 4604, 6.2, 6.3, and 6.4] 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-2253-4-7

**EXPIRATION DATE:** 10/31/2015

**EQUIPMENT DESCRIPTION:**

SIDE SEAM STRIPE SPRAY OPERATION (LINE #4) SERVED BY ONE ABM 420 BODYMAKER AND ONE 0.6 MMBTU/HR FLYNN AERO FLAME AF-9 CURING TUNNEL. THE FUME HOOD (OVER THE COATING APPLICATOR AND CONVEYOR) AND CURING TUNNEL IS VENTED TO THE SHARED THERMAL OXIDIZER

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] 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. The VOC contaminated air stream from the side seam stripe coater, conveyor between the coater and curing tunnel, and curing tunnel shall be vented to the thermal oxidizer at all times except when the thermal oxidizer is undergoing maintenance. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The collection system for fugitive VOC emissions from the side seam stripe coater, conveyor between the coater and curing tunnel, and curing tunnel shall have a minimum overall capture efficiency of 71%. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The thermal oxidizer shall be maintained at a minimum temperature of 1,490 Degrees F to provide at least 98.5% VOC control. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The thermal oxidizer shall be equipped with a continuous temperature monitoring and recording device. [District NSR Rule, Rules 2520, 9.3.2, 4604, 6.3 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
7. The overall VOC capture and control efficiency shall be calculated by multiplying the percent VOC capture efficiency of the collection system by the percent VOC control efficiency of the thermal oxidizer and divide by 100. [District NSR Rule and Rule 4604, 6.7.2.3] Federally Enforceable Through Title V Permit
8. Three-piece can side seam spray operations shall not use or apply any coating with a VOC content in excess of 660 grams of VOC per liter of coating, as applied, excluding water and exempt compounds. [District Rule 4604, 5.1] Federally Enforceable Through Title V Permit
9. 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): product cleaning during manufacturing process or surface preparation for coating application: 25 g/l (0.21 lb/gal), repair and maintenance cleaning: 25 g/l (0.21 lb/gal), cleaning of coating application equipment except sheet coater for three-piece cans: 25 g/l (0.21 lb/gal), cleaning of sheet coater for three-piece cans: 550 g/l (4.6 lb/gal) until 9/30/2011 and 250 g/l (2.3 lb/gal) on and after 10/1/2011. [District Rule 4604, 5.4] 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. For cleaning of coating application equipment used for sheet coating of three-piece cans, cleaning activities that are performed outside the control of an APCO-approved emission control system that meets the requirements of District Rule 4604 (9/20/07) using 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. [District Rule 4604, 5.4] Federally Enforceable Through Title V Permit
11. 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
12. Permittee shall not use VOC-containing materials 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
13. An operator 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
14. Only electrostatic, flow, roll, dip, hand application, HVLP, or other application methods with a coating transfer efficiency of at least 65% shall be used. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4604, 5.6.2]
15. Coating transfer efficiency shall be measured using a test method pursuant to Section 6.7.4 of Rule 4604 (9/20/07). [District Rule 4604, 5.6.2.7] Federally Enforceable Through Title V Permit
16. The VOC emissions due to coating and solvent usage (from this permit unit) shall not exceed 250 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
17. The PM10 emissions due to coating and solvent usage (from this permit unit) shall not exceed 0.4 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
18. The combined daily VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, and N-2253-21 shall not exceed 250 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
19. The combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, N-2253-21, and N-2253-22 shall not exceed 58,579 pounds during any consecutive 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
20. The NOx emission concentration from the thermal oxidizer shall not exceed 0.098 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
21. The CO emission concentration from the thermal oxidizer shall not exceed 0.082 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
22. The VOC emission concentration from the thermal oxidizer shall not exceed 0.005 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
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24. The PM10 emission concentration from the thermal oxidizer shall not exceed 0.0076 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
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26. 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 allowed 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, 6.7.1.2] Federally Enforceable Through Title V Permit
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31. Source testing of the capture efficiency and control efficiency of VOC emission collection and control devices shall be performed under conditions representative of normal operating conditions and under conditions specified in the Permit-To-Operate. [District Rules 1081 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
32. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
33. 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
34. A list of the coatings, catalysts and reducers used, the mix ratio of the components used, the VOC content of each coating used (as applied) and of the VOC content of each solvent used for clean-up and surface preparation shall be kept. The list shall be made available to the District upon request. [District Rules 2520, 9.3.2 and 4604, 6.1, 6.2] 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. Daily records of the following shall be kept: (a) The specific coatings used and the mix ratio of the components added to the coatings prior to application; (b) The volume of each coating used in gallons; (c) The specific solvent used for clean-up and surface preparation; (d) The volume of each solvent used; (e) The VOC emissions due to coating and solvent usage from this permit unit; (f). The combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, N-2253-21 and N-2253-22; (g). The operating temperature of the thermal oxidizer. [District Rules 1070, 2520, 9.3.2 and 4604, 6.1, 6.2 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
36. Records of the date, the time period and the reason that the thermal oxidizer is out of service shall be kept. [District NSR Rule, Rules 2520, 9.3.2, 4604, 5.2.2, 6.3 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
37. Records of the combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, N-2253-21, and N-2253-22 shall be kept for any consecutive 12-month period. [District Rules 2201 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
38. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 4604, 6.2, 6.3, and 6.4] 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-2253-6-7

**EXPIRATION DATE:** 10/31/2015

**EQUIPMENT DESCRIPTION:**

SIDE SEAM STRIPE SPRAY OPERATION (LINE #6) SERVED BY ONE SBW 270 BODYMAKER AND ONE 0.6 MMBTU/HR FLYNN AERO FLAME AF-9 CURING TUNNEL. THE FUME HOOD (OVER THE COATING APPLICATOR AND CONVEYOR) AND CURING TUNNEL IS VENTED TO THE SHARED THERMAL OXIDIZER

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] 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. The VOC contaminated air stream from the side seam stripe coater, conveyor between the coater and curing tunnel, and curing tunnel shall be vented to the thermal oxidizer at all times except when the thermal oxidizer is undergoing maintenance. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The collection system for fugitive VOC emissions from the side seam stripe coater, conveyor between the coater and curing tunnel, and curing tunnel shall have a minimum overall capture efficiency of 71%. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The thermal oxidizer shall be maintained at a minimum temperature of 1,490 Degrees F to provide at least 98.5% VOC control. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The thermal oxidizer shall be equipped with a continuous temperature monitoring and recording device. [District NSR Rule, Rules 2520, 9.3.2, 4604, 6.3 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
7. The overall VOC capture and control efficiency shall be calculated by multiplying the percent VOC capture efficiency of the collection system by the percent VOC control efficiency of the thermal oxidizer and divide by 100. [District NSR Rule and Rule 4604, 6.7.2.3] Federally Enforceable Through Title V Permit
8. Three-piece can side seam spray operations shall not use or apply any coating with a VOC content in excess of 660 grams of VOC per liter of coating, as applied, excluding water and exempt compounds. [District Rule 4604, 5.1] Federally Enforceable Through Title V Permit
9. 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): product cleaning during manufacturing process or surface preparation for coating application: 25 g/l (0.21 lb/gal), repair and maintenance cleaning: 25 g/l (0.21 lb/gal), cleaning of coating application equipment except sheet coater for three-piece cans: 25 g/l (0.21 lb/gal), cleaning of sheet coater for three-piece cans: 550 g/l (4.6 lb/gal) until 9/30/2011 and 250 g/l (2.3 lb/gal) on and after 10/1/2011. [District Rule 4604, 5.4] 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. For cleaning of coating application equipment used for sheet coating of three-piece cans, cleaning activities that are performed outside the control of an APCO-approved emission control system that meets the requirements of District Rule 4604 (9/20/07) using 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. [District Rule 4604, 5.4] Federally Enforceable Through Title V Permit
11. 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
12. Permittee shall not use VOC-containing materials 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
13. An operator 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
14. Only electrostatic, flow, roll, dip, hand application, HVLP, or other application methods with a coating transfer efficiency of at least 65% shall be used. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4604, 5.6.2]
15. Coating transfer efficiency shall be measured using a test method pursuant to Section 6.7.4 of Rule 4604 (9/20/07). [District Rule 4604, 5.6.2.7] Federally Enforceable Through Title V Permit
16. The VOC emissions due to coating and solvent usage (from this permit unit) shall not exceed 250 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
17. The PM10 emissions due to coating and solvent usage (from this permit unit) shall not exceed 0.4 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
18. The combined daily VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, and N-2253-21 shall not exceed 250 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
19. The combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, N-2253-21, and N-2253-22 shall not exceed 58,579 pounds during any consecutive 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
20. The NOx emission concentration from the thermal oxidizer shall not exceed 0.098 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
21. The CO emission concentration from the thermal oxidizer shall not exceed 0.082 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
22. The VOC emission concentration from the thermal oxidizer shall not exceed 0.005 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
23. The SOx emission concentration from the thermal oxidizer shall not exceed 0.00285 lb/MMBtu of natural gas consumption. [District NSR Rule and Rule 4801, 3.1]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

24. The PM10 emission concentration from the thermal oxidizer shall not exceed 0.0076 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
25. 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) 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 allowed 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, 6.7.1.1] Federally Enforceable Through Title V Permit
26. 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 allowed 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, 6.7.1.2] Federally Enforceable Through Title V Permit
27. The operator shall source test each collection device to determine the capture efficiency at least once five years. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
28. The capture efficiency of VOC emission collection devices 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 APCO. [District Rules 2520, 9.3.2 and 4604, 6.7.2.1] Federally Enforceable Through Title V Permit
29. The operator shall source test the thermal oxidizer at least once every twelve (12) months to demonstrate compliance with the VOC control efficiency requirements. [District Rule 2201] Federally Enforceable Through Title V Permit
30. The control efficiency of VOC emission control device(s) 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. [District Rule 4604, 6.7.2.2] Federally Enforceable Through Title V Permit
31. Source testing of the capture efficiency and control efficiency of VOC emission collection and control devices shall be performed under conditions representative of normal operating conditions and under conditions specified in the Permit-To-Operate. [District Rules 1081 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
32. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
33. 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
34. A list of the coatings, catalysts and reducers used, the mix ratio of the components used, the VOC content of each coating used (as applied) and of the VOC content of each solvent used for clean-up and surface preparation shall be kept. The list shall be made available to the District upon request. [District Rules 2520, 9.3.2 and 4604, 6.1, 6.2] 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. Daily records of the following shall be kept: (a) The specific coatings used and the mix ratio of the components added to the coatings prior to application; (b) The volume of each coating used in gallons; (c) The specific solvent used for clean-up and surface preparation; (d) The volume of each solvent used; (e) The VOC emissions due to coating and solvent usage from this permit unit; (f). The combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, N-2253-21 and N-2253-22; (g). The operating temperature of the thermal oxidizer. [District Rules 1070, 2520, 9.3.2 and 4604, 6.1, 6.2 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
36. Records of the date, the time period and the reason that the thermal oxidizer is out of service shall be kept. [District NSR Rule, Rules 2520, 9.3.2, 4604, 5.2.2, 6.3 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
37. Records of the combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, N-2253-21, and N-2253-22 shall be kept for any consecutive 12-month period. [District Rules 2201 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
38. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 4604, 6.2, 6.3, and 6.4] 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-2253-7-7

**EXPIRATION DATE:** 10/31/2015

**EQUIPMENT DESCRIPTION:**

SIDE SEAM STRIPE SPRAY OPERATION (LINE #7) SERVED BY ONE SOUDRONIC MODEL FBB BODYMAKER AND ONE 0.4 MMBTU/HR SARDEE SLIX-3 CURING TUNNEL. THE FUME HOOD (OVER THE COATING APPLICATOR AND CONVEYOR) AND CURING TUNNEL IS VENTED TO THE SHARED THERMAL OXIDIZER

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] 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. The VOC contaminated air stream from the side seam stripe coater, conveyor between the coater and curing tunnel, and curing tunnel shall be vented to the thermal oxidizer at all times except when the thermal oxidizer is undergoing maintenance. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The collection system for fugitive VOC emissions from the side seam stripe coater, conveyor between the coater and curing tunnel, and curing tunnel shall have a minimum overall capture efficiency of 71%. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The thermal oxidizer shall be maintained at a minimum temperature of 1,490 Degrees F to provide at least 98.5% VOC control. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The thermal oxidizer shall be equipped with a continuous temperature monitoring and recording device. [District NSR Rule, Rules 2520, 9.3.2, 4604, 6.3 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
7. The overall VOC capture and control efficiency shall be calculated by multiplying the percent VOC capture efficiency of the collection system by the percent VOC control efficiency of the thermal oxidizer and divide by 100. [District NSR Rule and Rule 4604, 6.7.2.3] Federally Enforceable Through Title V Permit
8. Three-piece can side seam spray operations shall not use or apply any coating with a VOC content in excess of 660 grams of VOC per liter of coating, as applied, excluding water and exempt compounds. [District Rule 4604, 5.1] Federally Enforceable Through Title V Permit
9. 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): product cleaning during manufacturing process or surface preparation for coating application: 25 g/l (0.21 lb/gal), repair and maintenance cleaning: 25 g/l (0.21 lb/gal), cleaning of coating application equipment except sheet coater for three-piece cans: 25 g/l (0.21 lb/gal), cleaning of sheet coater for three-piece cans: 550 g/l (4.6 lb/gal) until 9/30/2011 and 250 g/l (2.3 lb/gal) on and after 10/1/2011. [District Rule 4604, 5.4] 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. For cleaning of coating application equipment used for sheet coating of three-piece cans, cleaning activities that are performed outside the control of an APCO-approved emission control system that meets the requirements of District Rule 4604 (9/20/07) using 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. [District Rule 4604, 5.4] Federally Enforceable Through Title V Permit
11. 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
12. Permittee shall not use VOC-containing materials 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
13. An operator 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
14. Only electrostatic, flow, roll, dip, hand application, HVLP, or other application methods with a coating transfer efficiency of at least 65% shall be used. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4604, 5.6.2]
15. Coating transfer efficiency shall be measured using a test method pursuant to Section 6.7.4 of Rule 4604 (9/20/07). [District Rule 4604, 5.6.2.7] Federally Enforceable Through Title V Permit
16. The VOC emissions due to coating and solvent usage (from this permit unit) shall not exceed 250 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
17. The PM10 emissions due to coating and solvent usage (from this permit unit) shall not exceed 0.4 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
18. The combined daily VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, and N-2253-21 shall not exceed 250 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
19. The combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, N-2253-21, and N-2253-22 shall not exceed 58,579 pounds during any consecutive 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
20. The NOx emission concentration from the thermal oxidizer shall not exceed 0.098 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
21. The CO emission concentration from the thermal oxidizer shall not exceed 0.082 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
22. The VOC emission concentration from the thermal oxidizer shall not exceed 0.005 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
23. The SOx emission concentration from the thermal oxidizer shall not exceed 0.00285 lb/MMBtu of natural gas consumption. [District NSR Rule and Rule 4801, 3.1]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

24. The PM10 emission concentration from the thermal oxidizer shall not exceed 0.0076 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
25. 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) 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 allowed 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, 6.7.1.1] Federally Enforceable Through Title V Permit
26. 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 allowed 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, 6.7.1.2] Federally Enforceable Through Title V Permit
27. The operator shall source test each collection device to determine the capture efficiency at least once five years. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
28. The capture efficiency of VOC emission collection devices 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 APCO. [District Rules 2520, 9.3.2 and 4604, 6.7.2.1] Federally Enforceable Through Title V Permit
29. The operator shall source test the thermal oxidizer at least once every twelve (12) months to demonstrate compliance with the VOC control efficiency requirements. [District Rule 2201] Federally Enforceable Through Title V Permit
30. The control efficiency of VOC emission control device(s) 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. [District Rule 4604, 6.7.2.2] Federally Enforceable Through Title V Permit
31. Source testing of the capture efficiency and control efficiency of VOC emission collection and control devices shall be performed under conditions representative of normal operating conditions and under conditions specified in the Permit-To-Operate. [District Rules 1081 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
32. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
33. 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
34. A list of the coatings, catalysts and reducers used, the mix ratio of the components used, the VOC content of each coating used (as applied) and of the VOC content of each solvent used for clean-up and surface preparation shall be kept. The list shall be made available to the District upon request. [District Rules 2520, 9.3.2 and 4604, 6.1, 6.2] 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. Daily records of the following shall be kept: (a) The specific coatings used and the mix ratio of the components added to the coatings prior to application; (b) The volume of each coating used in gallons; (c) The specific solvent used for clean-up and surface preparation; (d) The volume of each solvent used; (e) The VOC emissions due to coating and solvent usage from this permit unit; (f). The combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, N-2253-21 and N-2253-22; (g). The operating temperature of the thermal oxidizer. [District Rules 1070, 2520, 9.3.2 and 4604, 6.1, 6.2 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
36. Records of the date, the time period and the reason that the thermal oxidizer is out of service shall be kept. [District NSR Rule, Rules 2520, 9.3.2, 4604, 5.2.2, 6.3 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
37. Records of the combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, N-2253-21, and N-2253-22 shall be kept for any consecutive 12-month period. [District Rules 2201 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
38. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 4604, 6.2, 6.3, and 6.4] 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-2253-8-7

**EXPIRATION DATE:** 10/31/2015

**EQUIPMENT DESCRIPTION:**

SIDE SEAM STRIPE SPRAY OPERATION (LINE #8) SERVED BY ONE SOUDRONIC MODEL FBB BODYMAKER AND ONE 0.4 MMBTU/HR SARDEE SLIX-3 CURING TUNNEL. THE FUME HOOD (OVER THE COATING APPLICATOR AND CONVEYOR) AND CURING TUNNEL IS VENTED TO THE SHARED THERMAL OXIDIZER

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] 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. The VOC contaminated air stream from the side seam stripe coater, conveyor between the coater and curing tunnel, and curing tunnel shall be vented to the thermal oxidizer at all times except when the thermal oxidizer is undergoing maintenance. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The collection system for fugitive VOC emissions from the side seam stripe coater, conveyor between the coater and curing tunnel, and curing tunnel shall have a minimum overall capture efficiency of 71%. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The thermal oxidizer shall be maintained at a minimum temperature of 1,490 Degrees F to provide at least 98.5% VOC control. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The thermal oxidizer shall be equipped with a continuous temperature monitoring and recording device. [District NSR Rule, Rules 2520, 9.3.2, 4604, 6.3 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
7. The overall VOC capture and control efficiency shall be calculated by multiplying the percent VOC capture efficiency of the collection system by the percent VOC control efficiency of the thermal oxidizer and divide by 100. [District NSR Rule and Rule 4604, 6.7.2.3] Federally Enforceable Through Title V Permit
8. Three-piece can side seam spray operations shall not use or apply any coating with a VOC content in excess of 660 grams of VOC per liter of coating, as applied, excluding water and exempt compounds. [District Rule 4604, 5.1] Federally Enforceable Through Title V Permit
9. 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): product cleaning during manufacturing process or surface preparation for coating application: 25 g/l (0.21 lb/gal), repair and maintenance cleaning: 25 g/l (0.21 lb/gal), cleaning of coating application equipment except sheet coater for three-piece cans: 25 g/l (0.21 lb/gal), cleaning of sheet coater for three-piece cans: 550 g/l (4.6 lb/gal) until 9/30/2011 and 250 g/l (2.3 lb/gal) on and after 10/1/2011. [District Rule 4604, 5.4] 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. For cleaning of coating application equipment used for sheet coating of three-piece cans, cleaning activities that are performed outside the control of an APCO-approved emission control system that meets the requirements of District Rule 4604 (9/20/07) using 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. [District Rule 4604, 5.4] Federally Enforceable Through Title V Permit
11. 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
12. Permittee shall not use VOC-containing materials 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
13. An operator 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
14. Only electrostatic, flow, roll, dip, hand application, HVLP, or other application methods with a coating transfer efficiency of at least 65% shall be used. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4604, 5.6.2]
15. Coating transfer efficiency shall be measured using a test method pursuant to Section 6.7.4 of Rule 4604 (9/20/07). [District Rule 4604, 5.6.2.7] Federally Enforceable Through Title V Permit
16. The VOC emissions due to coating and solvent usage (from this permit unit) shall not exceed 250 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
17. The PM10 emissions due to coating and solvent usage (from this permit unit) shall not exceed 0.4 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
18. The combined daily VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, and N-2253-21 shall not exceed 250 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
19. The combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, N-2253-21, and N-2253-22 shall not exceed 58,579 pounds during any consecutive 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
20. The NOx emission concentration from the thermal oxidizer shall not exceed 0.098 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
21. The CO emission concentration from the thermal oxidizer shall not exceed 0.082 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
22. The VOC emission concentration from the thermal oxidizer shall not exceed 0.005 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
23. The SOx emission concentration from the thermal oxidizer shall not exceed 0.00285 lb/MMBtu of natural gas consumption. [District NSR Rule and Rule 4801, 3.1]

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

24. The PM10 emission concentration from the thermal oxidizer shall not exceed 0.0076 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
25. 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) 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 allowed 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, 6.7.1.1] Federally Enforceable Through Title V Permit
26. 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 allowed 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, 6.7.1.2] Federally Enforceable Through Title V Permit
27. The operator shall source test each collection device to determine the capture efficiency at least once five years. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
28. The capture efficiency of VOC emission collection devices 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 APCO. [District Rules 2520, 9.3.2 and 4604, 6.7.2.1] Federally Enforceable Through Title V Permit
29. The operator shall source test the thermal oxidizer at least once every twelve (12) months to demonstrate compliance with the VOC control efficiency requirements. [District Rule 2201] Federally Enforceable Through Title V Permit
30. The control efficiency of VOC emission control device(s) 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. [District Rule 4604, 6.7.2.2] Federally Enforceable Through Title V Permit
31. Source testing of the capture efficiency and control efficiency of VOC emission collection and control devices shall be performed under conditions representative of normal operating conditions and under conditions specified in the Permit-To-Operate. [District Rules 1081 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
32. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
33. 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
34. A list of the coatings, catalysts and reducers used, the mix ratio of the components used, the VOC content of each coating used (as applied) and of the VOC content of each solvent used for clean-up and surface preparation shall be kept. The list shall be made available to the District upon request. [District Rules 2520, 9.3.2 and 4604, 6.1, 6.2] 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. Daily records of the following shall be kept: (a) The specific coatings used and the mix ratio of the components added to the coatings prior to application; (b) The volume of each coating used in gallons; (c) The specific solvent used for clean-up and surface preparation; (d) The volume of each solvent used; (e) The VOC emissions due to coating and solvent usage from this permit unit; (f). The combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, N-2253-21 and N-2253-22; (g). The operating temperature of the thermal oxidizer. [District Rules 1070, 2520, 9.3.2 and 4604, 6.1, 6.2 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
36. Records of the date, the time period and the reason that the thermal oxidizer is out of service shall be kept. [District NSR Rule, Rules 2520, 9.3.2, 4604, 5.2.2, 6.3 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
37. Records of the combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, N-2253-21, and N-2253-22 shall be kept for any consecutive 12-month period. [District Rules 2201 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
38. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 4604, 6.2, 6.3, and 6.4] 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-2253-9-7

EXPIRATION DATE: 10/31/2015

## EQUIPMENT DESCRIPTION:

SIDE SEAM STRIPE SPRAY OPERATION (LINE #9) SERVED BY ONE SOUDRONIC MODEL FBB BODYMAKER AND ONE 0.4 MMBTU/HR SARDEE SLIX-3 CURING TUNNEL. THE FUME HOOD (OVER THE COATING APPLICATOR AND CONVEYOR) AND CURING TUNNEL IS VENTED TO THE SHARED THERMAL OXIDIZER

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] 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. The VOC contaminated air stream from the side seam stripe coater, conveyor between the coater and curing tunnel, and curing tunnel shall be vented to the thermal oxidizer at all times except when the thermal oxidizer is undergoing maintenance. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The collection system for fugitive VOC emissions from the side seam stripe coater, conveyor between the coater and curing tunnel, and curing tunnel shall have a minimum overall capture efficiency of 71%. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The thermal oxidizer shall be maintained at a minimum temperature of 1,490 Degrees F to provide at least 98.5% VOC control. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The thermal oxidizer shall be equipped with a continuous temperature monitoring and recording device. [District NSR Rule, Rules 2520, 9.3.2, 4604, 6.3 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
7. The overall VOC capture and control efficiency shall be calculated by multiplying the percent VOC capture efficiency of the collection system by the percent VOC control efficiency of the thermal oxidizer and divide by 100. [District NSR Rule and Rule 4604, 6.7.2.3] Federally Enforceable Through Title V Permit
8. Three-piece can side seam spray operations shall not use or apply any coating with a VOC content in excess of 660 grams of VOC per liter of coating, as applied, excluding water and exempt compounds. [District Rule 4604, 5.1] Federally Enforceable Through Title V Permit
9. 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): product cleaning during manufacturing process or surface preparation for coating application: 25 g/l (0.21 lb/gal), repair and maintenance cleaning: 25 g/l (0.21 lb/gal), cleaning of coating application equipment except sheet coater for three-piece cans: 25 g/l (0.21 lb/gal), cleaning of sheet coater for three-piece cans: 550 g/l (4.6 lb/gal) until 9/30/2011 and 250 g/l (2.3 lb/gal) on and after 10/1/2011. [District Rule 4604, 5.4] 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. For cleaning of coating application equipment used for sheet coating of three-piece cans, cleaning activities that are performed outside the control of an APCO-approved emission control system that meets the requirements of District Rule 4604 (9/20/07) using 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. [District Rule 4604, 5.4] Federally Enforceable Through Title V Permit
11. 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
12. Permittee shall not use VOC-containing materials 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
13. An operator 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
14. Only electrostatic, flow, roll, dip, hand application, HVLP, or other application methods with a coating transfer efficiency of at least 65% shall be used. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4604, 5.6.2]
15. Coating transfer efficiency shall be measured using a test method pursuant to Section 6.7.4 of Rule 4604 (9/20/07). [District Rule 4604, 5.6.2.7] Federally Enforceable Through Title V Permit
16. The VOC emissions due to coating and solvent usage (from this permit unit) shall not exceed 250 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
17. The PM10 emissions due to coating and solvent usage (from this permit unit) shall not exceed 0.4 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
18. The combined daily VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, and N-2253-21 shall not exceed 250 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
19. The combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, N-2253-21, and N-2253-22 shall not exceed 58,579 pounds during any consecutive 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
20. The NOx emission concentration from the thermal oxidizer shall not exceed 0.098 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
21. The CO emission concentration from the thermal oxidizer shall not exceed 0.082 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
22. The VOC emission concentration from the thermal oxidizer shall not exceed 0.005 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
23. The SOx emission concentration from the thermal oxidizer shall not exceed 0.00285 lb/MMBtu of natural gas consumption. [District NSR Rule and Rule 4801, 3.1]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

24. The PM10 emission concentration from the thermal oxidizer shall not exceed 0.0076 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
25. 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) 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 allowed 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, 6.7.1.1] Federally Enforceable Through Title V Permit
26. 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 allowed 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, 6.7.1.2] Federally Enforceable Through Title V Permit
27. The operator shall source test each collection device to determine the capture efficiency at least once five years. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
28. The capture efficiency of VOC emission collection devices 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 APCO. [District Rules 2520, 9.3.2 and 4604, 6.7.2.1] Federally Enforceable Through Title V Permit
29. The operator shall source test the thermal oxidizer at least once every twelve (12) months to demonstrate compliance with the VOC control efficiency requirements. [District Rule 2201] Federally Enforceable Through Title V Permit
30. The control efficiency of VOC emission control device(s) 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. [District Rule 4604, 6.7.2.2] Federally Enforceable Through Title V Permit
31. Source testing of the capture efficiency and control efficiency of VOC emission collection and control devices shall be performed under conditions representative of normal operating conditions and under conditions specified in the Permit-To-Operate. [District Rules 1081 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
32. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
33. 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
34. A list of the coatings, catalysts and reducers used, the mix ratio of the components used, the VOC content of each coating used (as applied) and of the VOC content of each solvent used for clean-up and surface preparation shall be kept. The list shall be made available to the District upon request. [District Rules 2520, 9.3.2 and 4604, 6.1, 6.2] 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. Daily records of the following shall be kept: (a) The specific coatings used and the mix ratio of the components added to the coatings prior to application; (b) The volume of each coating used in gallons; (c) The specific solvent used for clean-up and surface preparation; (d) The volume of each solvent used; (e) The VOC emissions due to coating and solvent usage from this permit unit; (f). The combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, N-2253-21 and N-2253-22; (g). The operating temperature of the thermal oxidizer. [District Rules 1070, 2520, 9.3.2 and 4604, 6.1, 6.2 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
36. Records of the date, the time period and the reason that the thermal oxidizer is out of service shall be kept. [District NSR Rule, Rules 2520, 9.3.2, 4604, 5.2.2, 6.3 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
37. Records of the combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, N-2253-21, and N-2253-22 shall be kept for any consecutive 12-month period. [District Rules 2201 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
38. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 4604, 6.2, 6.3, and 6.4] 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-2253-15-8

**EXPIRATION DATE:** 10/31/2015

**EQUIPMENT DESCRIPTION:**

SHEET COATING OPERATION #2 CONSISTING OF A WAGNER MODEL 15X44-A SHEET COATER AND A SHARED 8.6 MMBTU/HR YOUNG BROS. KELGRAF OVEN WITH MAXON CYCLOMAX LOW NOX BURNERS. THE COATING APPLICATION EQUIPMENT AND THE OVEN ARE ALL VENTED TO THE SHARED THERMAL OXIDIZER

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] 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 NSR Rule] Federally Enforceable Through Title V Permit
3. The VOC contaminated air stream from the coating application operation and the curing oven shall be vented to the thermal oxidizer prior to discharge into the atmosphere at all times. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The thermal oxidizer shall be maintained at a minimum temperature of 1,490 Degrees F to provide at least 98.5% VOC capture and control. [District NSR Rule, Rules 2520, 9.3.2, 4604, 5.2.2, 6.4 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
5. The thermal oxidizer shall be equipped with an operational continuous temperature monitoring and recording device. [District NSR Rule, Rules 2520, 9.3.2, 4604, 6.4 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
6. All solvent cleaning activities shall be performed using solvents with VOC contents not exceeding 25 g/l (0.21 lb/gal) 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). [District Rule 4604, 5.4] Federally Enforceable Through Title V Permit
7. 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
8. Permittee shall not use VOC-containing materials 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
9. An operator 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
10. The VOC emissions due to coating and solvent use shall not exceed 36.7 pounds during any one day. [District NSR Rule and 40 CFR Part 64] 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 the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18, shall not exceed 10,366 pounds during the first calendar quarter, 9,941 pounds during the second calendar quarter, 10,187 pounds during the third calendar quarter and 10,027 pounds during the fourth calendar quarter. The first and fourth calendar quarter VOC emissions may be increased by the amount of second and third calendar quarter VOC's not emitted. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The combined VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18, shall not exceed 40,521 pounds during any consecutive 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The NO<sub>x</sub> emission concentration from the curing oven shall not exceed 0.024 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
14. The CO emission concentration from the curing oven shall not exceed 0.15 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
15. The VOC emission concentration from the curing oven, due to the the burning of natural gas, shall not exceed 0.005 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
16. The SO<sub>x</sub> emission concentration from the curing oven shall not exceed 0.00285 lb/MMBtu of natural gas consumption. [District NSR Rule and Rule 4801, 3.1]
17. The PM<sub>10</sub> emission concentration from the curing oven shall not exceed 0.0076 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
18. The NO<sub>x</sub> emission concentration from the thermal oxidizer shall not exceed 0.098 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
19. The CO emission concentration from the thermal oxidizer shall not exceed 0.082 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
20. The VOC emission concentration from the thermal oxidizer shall not exceed 0.005 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
21. The SO<sub>x</sub> emission concentration from the thermal oxidizer shall not exceed 0.00285 lb/MMBtu of natural gas consumption. [District NSR Rule and Rule 4801, 3.1]
22. The PM<sub>10</sub> emission concentration from the thermal oxidizer shall not exceed 0.0076 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
23. 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) 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 allowed 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, 6.7.1.1] Federally Enforceable Through Title V Permit
24. 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 allowed 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, 6.7.1.2] 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. The operator shall source test the thermal oxidizer at least once every twelve (12) months to demonstrate compliance with the VOC control efficiency requirements. [District Rules 1081, 2520, 9.3.2, 4604, 5.2.8.3 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
26. The control efficiency of VOC emission control device(s) 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. [District Rule 4604, 6.7.2.2] Federally Enforceable Through Title V Permit
27. Source testing of the capture efficiency and control efficiency of VOC emission collection and control devices shall be performed under conditions representative of normal operating conditions using non-compliant coating and under conditions specified in the Permit-To-Operate. [District Rule 4604, 5.2.8.2 and 5.2.8.3] 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 Rules 1081 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
29. 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
30. A list of the coatings, catalysts and reducers used, the mix ratio of the components used, the VOC content of each coating used (as applied) and of the VOC content of each solvent used for clean-up and surface preparation shall be kept. The list shall be made available to the District upon request. [District Rules 2520, 9.3.2 and 4604, 6.1, 6.2] Federally Enforceable Through Title V Permit
31. Daily records of the following shall be kept: (a) The specific coatings used and the mix ratio of the components added to the coatings prior to application; (b) The volume of each coating used in gallons; (c) The specific solvent used for clean-up and surface preparation; (d) The volume of each solvent used; (e) The VOC emissions due to coating and solvent usage from this permit unit; (f). The operating temperature of the thermal oxidizer. [District Rules 1070, 2520, 9.3.2 and 4604, 6.1, 6.2 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
32. Records of the combined quarterly VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18 (including the VOC's due to combustion), shall be kept. The records shall be updated at least weekly. [District Rules 1070 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
33. Records of the combined VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18 (including the VOC's due to combustion), shall be kept for consecutive 12-month period. [District NSR Rule] Federally Enforceable Through Title V Permit
34. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 4604, 6.2, 6.3, and 6.4] 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-2253-16-8

**EXPIRATION DATE:** 10/31/2015

**EQUIPMENT DESCRIPTION:**

SHEET COATING OPERATION #3 CONSISTING OF A WAGNER MODEL 15X44-A SHEET COATER AND A SHARED 8.6 MMBTU/HR YOUNG BROS. KELGRAF OVEN WITH MAXON CYCLOMAX LOW NOX BURNERS. THE COATING APPLICATION EQUIPMENT AND THE OVEN ARE ALL VENTED TO THE SHARED THERMAL OXIDIZER

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] 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 NSR Rule] Federally Enforceable Through Title V Permit
3. The VOC contaminated air stream from the coating application operation and the curing oven shall be vented to the thermal oxidizer prior to discharge into the atmosphere at all times. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The thermal oxidizer shall be maintained at a minimum temperature of 1,490 Degrees F to provide at least 98.5% VOC capture and control. [District NSR Rule, Rules 2520, 9.3.2, 4604, 5.2.2, 6.4 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
5. The thermal oxidizer shall be equipped with an operational continuous temperature monitoring and recording device. [District NSR Rule, Rules 2520, 9.3.2, 4604, 6.4 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
6. All solvent cleaning activities shall be performed using solvents with VOC contents not exceeding 25 g/l (0.21 lb/gal) 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). [District Rule 4604, 5.4] Federally Enforceable Through Title V Permit
7. 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
8. Permittee shall not use VOC-containing materials 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
9. An operator 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
10. The VOC emissions due to coating and solvent use shall not exceed 36.7 pounds during any one day. [District NSR Rule and 40 CFR Part 64] 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 the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18, shall not exceed 10,366 pounds during the first calendar quarter, 9,941 pounds during the second calendar quarter, 10,187 pounds during the third calendar quarter and 10,027 pounds during the fourth calendar quarter. The first and fourth calendar quarter VOC emissions may be increased by the amount of second and third calendar quarter VOC's not emitted. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The combined VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18, shall not exceed 40,521 pounds during any consecutive 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The NOx emission concentration from the curing oven shall not exceed 0.024 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
14. The CO emission concentration from the curing oven shall not exceed 0.15 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
15. The VOC emission concentration from the curing oven, due to the the burning of natural gas, shall not exceed 0.005 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
16. The SOx emission concentration from the curing oven shall not exceed 0.00285 lb/MMBtu of natural gas consumption. [District NSR Rule and Rule 4801, 3.1]
17. The PM10 emission concentration from the curing oven shall not exceed 0.0076 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
18. The NOx emission concentration from the thermal oxidizer shall not exceed 0.098 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
19. The CO emission concentration from the thermal oxidizer shall not exceed 0.082 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
20. The VOC emission concentration from the thermal oxidizer shall not exceed 0.005 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
21. The SOx emission concentration from the thermal oxidizer shall not exceed 0.00285 lb/MMBtu of natural gas consumption. [District NSR Rule and Rule 4801, 3.1]
22. The PM10 emission concentration from the thermal oxidizer shall not exceed 0.0076 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
23. 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) 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 allowed 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, 6.7.1.1] Federally Enforceable Through Title V Permit
24. 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 allowed 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, 6.7.1.2] 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. The operator shall source test the thermal oxidizer at least once every twelve (12) months to demonstrate compliance with the VOC control efficiency requirements. [District Rules 1081, 2520, 9.3.2, 4604, 5.2.8.3 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
26. The control efficiency of VOC emission control device(s) 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. [District Rule 4604, 6.7.2.2] Federally Enforceable Through Title V Permit
27. Source testing of the capture efficiency and control efficiency of VOC emission collection and control devices shall be performed under conditions representative of normal operating conditions using non-compliant coating and under conditions specified in the Permit-To-Operate. [District Rule 4604, 5.2.8.2 and 5.2.8.3] 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 Rules 1081 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
29. 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
30. A list of the coatings, catalysts and reducers used, the mix ratio of the components used, the VOC content of each coating used (as applied) and of the VOC content of each solvent used for clean-up and surface preparation shall be kept. The list shall be made available to the District upon request. [District Rules 2520, 9.3.2 and 4604, 6.1, 6.2] Federally Enforceable Through Title V Permit
31. Daily records of the following shall be kept: (a) The specific coatings used and the mix ratio of the components added to the coatings prior to application; (b) The volume of each coating used in gallons; (c) The specific solvent used for clean-up and surface preparation; (d) The volume of each solvent used; (e) The VOC emissions due to coating and solvent usage from this permit unit; (f). The operating temperature of the thermal oxidizer. [District Rules 1070, 2520, 9.3.2 and 4604, 6.1, 6.2 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
32. Records of the combined quarterly VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18 (including the VOC's due to combustion), shall be kept. The records shall be updated at least weekly. [District Rules 1070 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
33. Records of the combined VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18 (including the VOC's due to combustion), shall be kept for consecutive 12-month period. [District NSR Rule] Federally Enforceable Through Title V Permit
34. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 4604, 6.2, 6.3, and 6.4] 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-2253-17-8

**EXPIRATION DATE:** 10/31/2015

**EQUIPMENT DESCRIPTION:**

SHEET COATING OPERATION #4 CONSISTING OF A WAGNER MODEL 15X44-A SHEET COATER AND A SHARED 8.6 MMBTU/HR YOUNG BROS. KELGRAF OVEN WITH MAXON CYCLOMAX LOW NOX BURNERS. THE COATING APPLICATION EQUIPMENT AND THE OVEN ARE ALL VENTED TO THE SHARED THERMAL OXIDIZER

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] 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 NSR Rule] Federally Enforceable Through Title V Permit
3. The VOC contaminated air stream from the coating application operation and the curing oven shall be vented to the thermal oxidizer prior to discharge into the atmosphere at all times. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The thermal oxidizer shall be maintained at a minimum temperature of 1,490 Degrees F to provide at least 98.5% VOC capture and control. [District NSR Rule, Rules 2520, 9.3.2, 4604, 5.2.2, 6.4 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
5. The thermal oxidizer shall be equipped with an operational continuous temperature monitoring and recording device. [District NSR Rule, Rules 2520, 9.3.2, 4604, 6.4 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
6. All solvent cleaning activities shall be performed using solvents with VOC contents not exceeding 25 g/l (0.21 lb/gal) 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). [District Rule 4604, 5.4] Federally Enforceable Through Title V Permit
7. 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
8. Permittee shall not use VOC-containing materials 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
9. An operator 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
10. The VOC emissions due to coating and solvent use shall not exceed 36.7 pounds during any one day. [District NSR Rule and 40 CFR Part 64] 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 the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18, shall not exceed 10,366 pounds during the first calendar quarter, 9,941 pounds during the second calendar quarter, 10,187 pounds during the third calendar quarter and 10,027 pounds during the fourth calendar quarter. The first and fourth calendar quarter VOC emissions may be increased by the amount of second and third calendar quarter VOC's not emitted. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The combined VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18, shall not exceed 40,521 pounds during any consecutive 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The NO<sub>x</sub> emission concentration from the curing oven shall not exceed 0.024 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
14. The CO emission concentration from the curing oven shall not exceed 0.15 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
15. The VOC emission concentration from the curing oven, due to the the burning of natural gas, shall not exceed 0.005 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
16. The SO<sub>x</sub> emission concentration from the curing oven shall not exceed 0.00285 lb/MMBtu of natural gas consumption. [District NSR Rule and Rule 4801, 3.1]
17. The PM<sub>10</sub> emission concentration from the curing oven shall not exceed 0.0076 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
18. The NO<sub>x</sub> emission concentration from the thermal oxidizer shall not exceed 0.098 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
19. The CO emission concentration from the thermal oxidizer shall not exceed 0.082 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
20. The VOC emission concentration from the thermal oxidizer shall not exceed 0.005 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
21. The SO<sub>x</sub> emission concentration from the thermal oxidizer shall not exceed 0.00285 lb/MMBtu of natural gas consumption. [District NSR Rule and Rule 4801, 3.1]
22. The PM<sub>10</sub> emission concentration from the thermal oxidizer shall not exceed 0.0076 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
23. 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) 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 allowed 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, 6.7.1.1] Federally Enforceable Through Title V Permit
24. 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 allowed 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, 6.7.1.2] 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. The operator shall source test the thermal oxidizer at least once every twelve (12) months to demonstrate compliance with the VOC control efficiency requirements. [District Rules 1081, 2520, 9.3.2, 4604, 5.2.8.3 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
26. The control efficiency of VOC emission control device(s) 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. [District Rule 4604, 6.7.2.2] Federally Enforceable Through Title V Permit
27. Source testing of the capture efficiency and control efficiency of VOC emission collection and control devices shall be performed under conditions representative of normal operating conditions using non-compliant coating and under conditions specified in the Permit-To-Operate. [District Rule 4604, 5.2.8.2 and 5.2.8.3] 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 Rules 1081 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
29. 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
30. A list of the coatings, catalysts and reducers used, the mix ratio of the components used, the VOC content of each coating used (as applied) and of the VOC content of each solvent used for clean-up and surface preparation shall be kept. The list shall be made available to the District upon request. [District Rules 2520, 9.3.2 and 4604, 6.1, 6.2] Federally Enforceable Through Title V Permit
31. Daily records of the following shall be kept: (a) The specific coatings used and the mix ratio of the components added to the coatings prior to application; (b) The volume of each coating used in gallons; (c) The specific solvent used for clean-up and surface preparation; (d) The volume of each solvent used; (e) The VOC emissions due to coating and solvent usage from this permit unit; (f). The operating temperature of the thermal oxidizer. [District Rules 1070, 2520, 9.3.2 and 4604, 6.1, 6.2 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
32. Records of the combined quarterly VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18 (including the VOC's due to combustion), shall be kept. The records shall be updated at least weekly. [District Rules 1070 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
33. Records of the combined VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18 (including the VOC's due to combustion), shall be kept for consecutive 12-month period. [District NSR Rule] Federally Enforceable Through Title V Permit
34. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 4604, 6.2, 6.3, and 6.4] 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-2253-18-8

**EXPIRATION DATE:** 10/31/2015

**EQUIPMENT DESCRIPTION:**

UV TYPE SHEET COATING OPERATION #1 CONSISTING OF A CRABTREE MODEL 13X45-F1 SHEET COATER. THE SHARED OVEN FROM PERMIT UNITS N-2253-15, N-2253-16, AND N-2253-17 MAY SERVE THE PRODUCTS MANUFACTURED FROM THIS PERMIT UNIT

## PERMIT UNIT REQUIREMENTS

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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 NSR Rule] Federally Enforceable Through Title V Permit
2. All solvent cleaning activities shall be performed using solvents with VOC contents not exceeding 25 g/l (0.21 lb/gal) 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). [District Rule 4604, 5.4] Federally Enforceable Through Title V Permit
3. 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
4. Permittee shall not use VOC-containing materials 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
5. An operator 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
6. The VOC emissions due to coating and solvent use shall not exceed 0.2 pounds during any one day. [District NSR Rule] Federally Enforceable Through Title V Permit
7. The combined VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18, shall not exceed 10,366 pounds during the first calendar quarter, 9,941 pounds during the second calendar quarter, 10,187 pounds during the third calendar quarter, and 10,027 pounds during the fourth calendar quarter. The first and fourth calendar quarter VOC emissions may be increased by the amount of second and third calendar quarter VOC's not emitted. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The combined VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18, shall not exceed 40,521 pounds for any consecutive 12-month period. [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.

9. 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) 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 allowed 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, 6.7.1.1] Federally Enforceable Through Title V Permit
10. 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 allowed 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, 6.7.1.2] Federally Enforceable Through Title V Permit
11. A list of the coatings, catalysts and reducers used, the mix ratio of the components used, the VOC content of each coating used (as applied) and of the VOC content of each solvent used for clean-up and surface preparation shall be kept. The list shall be made available to the District upon request. [District Rules 2520, 9.3.2 and 4604, 6.1, 6.2]] Federally Enforceable Through Title V Permit
12. Daily records of the following shall be kept: (a) The specific coatings used and the mix ratio of the components added to the coatings prior to application; (b) The volume of each coating used in gallons; (c) The specific solvent used for clean-up and surface preparation; (d) The volume of each solvent used; (e) The VOC emissions due to coating and solvent usage from this permit unit. [District Rules 1070, 2520, 9.3.2 and 4604, 6.1, 6.2] Federally Enforceable Through Title V Permit
13. Records of the combined quarterly VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18 (including the VOC's due to combustion), shall be kept. The records shall be updated at least weekly. [District Rules 1070 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
14. Records of the combined annual VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18 (including the VOC's due to combustion), shall be kept. The records shall be updated at least weekly. [District NSR Rule] Federally Enforceable Through Title V Permit
15. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 4604, 6.2 and 6.3] 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-2253-19-4

**EXPIRATION DATE:** 10/31/2015

**EQUIPMENT DESCRIPTION:**

COATING STORAGE TANK #1 CONSISTING OF ONE 8,000 GALLON ABOVEGROUND VERTICAL FIXED ROOF STORAGE TANK

## PERMIT UNIT REQUIREMENTS

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1. The maximum amount of coatings received into the storage tank shall not exceed 8,000 gallons in any one day and 416,000 gallons in any one calendar year. [District NSR Rule] Federally Enforceable Through Title V Permit
2. The VOC emission rate from the receiving and storage of the coatings shall not exceed 0.6 lb VOC/day and 27 lb VOC/year. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Organic liquids that are received, stored, or held in this tank shall have a true vapor pressure (TVP) less than 0.5 psia under all storage conditions. [District Rule 4623, 4.4] Federally Enforceable Through Title V Permit
4. Permittee shall conduct true vapor pressure (TVP) testing of the organic liquid stored in this tank at least once every 24 months during the summer (July - September), and/or whenever there is a change in the source or type of organic liquid stored in this tank. In lieu of testing each tank, the permittee may conduct TVP testing of a representative tank provided the requirements of District Rule 4623 (amended 5/19/05), Section 6.2 are satisfied. TVP testing shall not be required for tanks that exclusively store organic liquids listed in Appendix A of District Rule 4623, provided the storage temperature indicated in Appendix A is not exceeded at any time. [District Rule 4623, 6.2.2] Federally Enforceable Through Title V Permit
5. The TVP testing shall be conducted at actual storage temperature of the organic liquid in the tank. [District Rule 4623, 6.2.2] Federally Enforceable Through Title V Permit
6. The TVP of any organic liquid, except for crude oil, shall be determined by measuring the Reid Vapor Pressure (RVP) using ASTM D 323 (Test Method for Vapor Pressure for Petroleum Products), 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 with the procedures in Appendix B. Appendix B is an excerpt from the oil and gas section of "ARB Technical Guidance Document to the Criteria and Guidelines Regulation for AB 2588", dated August 1989. [District Rule 4623, 6.4.3] Federally Enforceable Through Title V Permit
7. Permittee shall submit the records of TVP and API gravity testing to the APCO within 45 days after the date of testing. The records shall include the tank identification number, Permit to Operate number, type of stored organic liquid, TVP and API gravity of the organic liquid, test methods used, and a copy of the test results. [District Rule 4623, 6.3.6] Federally Enforceable Through Title V Permit
8. The operator shall maintain records that indicate the true vapor pressure (TVP) of the coatings stored, the daily quantity of coatings received into the tank, and the cumulative annual quantity of coatings received into the storage tank. [District NSR Rule, District Rules 2520, 9.3.2 and 4623, 6.3] Federally Enforceable Through Title V Permit
9. The operator shall keep an accurate record of each organic liquid stored in each tank, including its storage temperature, TVP, and API gravity. [District Rules 2520, 9.3.2 and 4623, 6.3.1] Federally Enforceable Through Title V Permit
10. All records shall be retained for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rules 1070, 2520, 9.4.2 and 4623, 6.3] 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-2253-20-4

**EXPIRATION DATE:** 10/31/2015

**EQUIPMENT DESCRIPTION:**

COATING STORAGE TANK #2 CONSISTING OF ONE 8,000 GALLON ABOVEGROUND VERTICAL FIXED ROOF STORAGE TANK

## PERMIT UNIT REQUIREMENTS

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1. The maximum amount of coatings received into the storage tank shall not exceed 8,000 gallons in any one day and 416,000 gallons in any one calendar year. [District NSR Rule] Federally Enforceable Through Title V Permit
2. The VOC emission rate from the receiving and storage of the coatings shall not exceed 0.6 lb VOC/day and 27 lb VOC/year. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Organic liquids that are received, stored, or held in this tank shall have a true vapor pressure (TVP) less than 0.5 psia under all storage conditions. [District Rule 4623, 4.4] Federally Enforceable Through Title V Permit
4. Permittee shall conduct true vapor pressure (TVP) testing of the organic liquid stored in this tank at least once every 24 months during summer (July - September), and/or whenever there is a change in the source or type of organic liquid stored in this tank. In lieu of testing each tank, the permittee may conduct TVP testing of a representative tank provided the requirements of District Rule 4623 (amended 5/19/05), Section 6.2 are satisfied. TVP testing shall not be required for tanks that exclusively store organic liquids listed in Appendix A of District Rule 4623, provided the storage temperature indicated in Appendix A is not exceeded at any time. [District Rule 4623, 6.2.2] Federally Enforceable Through Title V Permit
5. The TVP testing shall be conducted at actual storage temperature of the organic liquid in the tank. [District Rule 4623, 6.2.2] Federally Enforceable Through Title V Permit
6. The TVP of any organic liquid, except for crude oil, shall be determined by measuring the Reid Vapor Pressure (RVP) using ASTM D 323 (Test Method for Vapor Pressure for Petroleum Products), 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 with the procedures in Appendix B. Appendix B is an excerpt from the oil and gas section of "ARB Technical Guidance Document to the Criteria and Guidelines Regulation for AB 2588", dated August 1989. [District Rule 4623, 6.4.3] Federally Enforceable Through Title V Permit
7. Permittee shall submit the records of TVP and API gravity testing to the APCO within 45 days after the date of testing. The records shall include the tank identification number, Permit to Operate number, type of stored organic liquid, TVP and API gravity of the organic liquid, test methods used, and a copy of the test results. [District Rule 4623, 6.3.6] Federally Enforceable Through Title V Permit
8. The operator shall maintain records that indicate the true vapor pressure (TVP) of the coatings stored, the daily quantity of coatings received into the tank, and the cumulative annual quantity of coatings received into the storage tank. [District NSR Rule, District Rules 2520, 9.3.2 and 4623, 6.3] Federally Enforceable Through Title V Permit
9. The operator shall keep an accurate record of each organic liquid stored in each tank, including its storage temperature, TVP, and API gravity. [District Rules 2520, 9.3.2 and 4623, 6.3.1] Federally Enforceable Through Title V Permit
10. All records shall be retained for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rules 1070, 2520, 9.4.2 and 4623, 6.3] 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-2253-21-3

**EXPIRATION DATE:** 10/31/2015

**EQUIPMENT DESCRIPTION:**

SIDE SEAM STRIPE SPRAY OPERATION (LINE #10) SERVED BY ONE SOUDRONIC MODEL AFB 1075 BODYMAKER AND ONE 0.6 MMBTU/HR SOUDRONIC MODEL LSC-12 CURING TUNNEL. THE FUME HOOD (OVER THE COATING APPLICATOR AND CONVEYOR) AND CURING TUNNEL ARE SERVED BY THE SHARED THERMAL OXIDIZER

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] 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. The VOC contaminated air stream from the side seam stripe coater, conveyor between the coater and curing tunnel, and curing tunnel shall be vented to the thermal oxidizer at all times except when the thermal oxidizer is undergoing maintenance. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The collection system for fugitive VOC emissions from the side seam stripe coater, conveyor between the coater and curing tunnel, and curing tunnel shall have a minimum overall capture efficiency of 71%. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The thermal oxidizer shall be maintained at a minimum temperature of 1,490 Degrees F to provide at least 98.5% VOC control. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The thermal oxidizer shall be equipped with a continuous temperature monitoring and recording device. [District NSR Rule, Rules 2520, 9.3.2, 4604, 6.3 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
7. The overall VOC capture and control efficiency shall be calculated by multiplying the percent VOC capture efficiency of the collection system by the percent VOC control efficiency of the thermal oxidizer and divide by 100. [District NSR Rule and Rule 4604, 6.7.2.3] Federally Enforceable Through Title V Permit
8. Three-piece can side seam spray operations shall not use or apply any coating with a VOC content in excess of 660 grams of VOC per liter of coating, as applied, excluding water and exempt compounds. [District Rule 4604, 5.1] Federally Enforceable Through Title V Permit
9. 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): product cleaning during manufacturing process or surface preparation for coating application: 25 g/l (0.21 lb/gal), repair and maintenance cleaning: 25 g/l (0.21 lb/gal), cleaning of coating application equipment except sheet coater for three-piece cans: 25 g/l (0.21 lb/gal), cleaning of sheet coater for three-piece cans: 550 g/l (4.6 lb/gal) until 9/30/2011 and 250 g/l (2.3 lb/gal) on and after 10/1/2011. [District Rule 4604, 5.4] 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. For cleaning of coating application equipment used for sheet coating of three-piece cans, cleaning activities that are performed outside the control of an APCO-approved emission control system that meets the requirements of District Rule 4604 (9/20/07) using 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. [District Rule 4604, 5.4] Federally Enforceable Through Title V Permit
11. 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
12. Permittee shall not use VOC-containing materials 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
13. An operator 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
14. Only electrostatic, flow, roll, dip, hand application, HVLP, or other application methods with a coating transfer efficiency of at least 65% shall be used. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4604, 5.6.2]
15. Coating transfer efficiency shall be measured using a test method pursuant to Section 6.7.4 of Rule 4604 (9/20/07). [District Rule 4604, 5.6.2.7] Federally Enforceable Through Title V Permit
16. The VOC emissions due to coating and solvent usage (from this permit unit) shall not exceed 250 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
17. The PM10 emissions due to coating and solvent usage (from this permit unit) shall not exceed 0.4 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
18. The combined daily VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, and N-2253-21, shall not exceed 250 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
19. The combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, and N-2253-21, shall not exceed 58,579 pounds during any consecutive 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
20. The NOx emission concentration from the thermal oxidizer shall not exceed 0.098 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
21. The CO emission concentration from the thermal oxidizer shall not exceed 0.082 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
22. The VOC emission concentration from the thermal oxidizer shall not exceed 0.005 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
23. The SOx emission concentration from the thermal oxidizer shall not exceed 0.00285 lb/MMBtu of natural gas consumption. [District NSR Rule and Rule 4801, 3.1]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

24. The PM10 emission concentration from the thermal oxidizer shall not exceed 0.0076 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
25. 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) 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 allowed 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, 6.7.1.1] Federally Enforceable Through Title V Permit
26. 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 allowed 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, 6.7.1.2] Federally Enforceable Through Title V Permit
27. The operator shall source test each collection device to determine the capture efficiency at least once five years. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
28. The capture efficiency of VOC emission collection devices 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 APCO. [District Rules 2520, 9.3.2 and 4604, 6.7.2.1] Federally Enforceable Through Title V Permit
29. The operator shall source test the thermal oxidizer at least once every twelve (12) months to demonstrate compliance with the VOC control efficiency requirements. [District Rule 2201] Federally Enforceable Through Title V Permit
30. The control efficiency of VOC emission control device(s) 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. [District Rule 4604, 6.7.2.2] Federally Enforceable Through Title V Permit
31. Source testing of the capture efficiency and control efficiency of VOC emission collection and control devices shall be performed under conditions representative of normal operating conditions and under conditions specified in the Permit-To-Operate. [District Rules 1081 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
32. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
33. 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
34. A list of the coatings, catalysts and reducers used, the mix ratio of the components used, the VOC content of each coating used (as applied) and of the VOC content of each solvent used for clean-up and surface preparation shall be kept. The list shall be made available to the District upon request. [District Rules 2520, 9.3.2 and 4604, 6.1, 6.2] 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. Daily records of the following shall be kept: (a) The specific coatings used and the mix ratio of the components added to the coatings prior to application; (b) The volume of each coating used in gallons; (c) The specific solvent used for clean-up and surface preparation; (d) The volume of each solvent used; (e) The VOC emissions due to coating and solvent usage from this permit unit; (f). The combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, N-2253-21 and N-2253-22; (g). The operating temperature of the thermal oxidizer. [District Rules 1070, 2520, 9.3.2 and 4604, 6.1, 6.2 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
36. Records of the date, the time period and the reason that the thermal oxidizer is out of service shall be kept. [District NSR Rule, Rules 2520, 9.3.2, 4604, 5.2.2, 6.3 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
37. Records of the combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, N-2253-21 and N-2253-22 shall be kept for any consecutive 12-month period. [District Rules 2201 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
38. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 4604, 6.2, 6.3, and 6.4] 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-2253-22-1

**EXPIRATION DATE:** 10/31/2015

**EQUIPMENT DESCRIPTION:**

SIDE SEAM STRIPE SPRAY OPERATION (LINE #5) SERVED BY ONE SOUDRONIC MODEL AFB-860 BODYMAKER AND ONE 0.4 MMBTU/HR SOUDRONIC MODEL USC-15 CURING TUNNEL. A FUME HOOD OVER THE COATING APPLICATOR, CONVEYOR, AND CURING TUNNEL ARE VENTED TO THE SHARED 8.0 MMBTU/HR SMITH THERMAL OXIDIZER

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] 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. The VOC contaminated air stream from the side seam stripe coater, conveyor between the coater and curing tunnel, and curing tunnel shall be vented to the thermal oxidizer at all time except when the thermal oxidizer is undergoing maintenance. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The collection system for fugitive VOC emissions from the side seam stripe coater, conveyor between the coater and curing tunnel, and curing tunnel shall have a minimum overall capture efficiency of 71%. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The thermal oxidizer shall be maintained at a minimum temperature of 1,490 Degrees F to provide at least 98.5% VOC control. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The thermal oxidizer shall be equipped with a continuous temperature monitoring and recording device. [District Rules 2520, 9.3.2, 4604, 6.3 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
7. The overall VOC capture and control efficiency shall be calculated by multiplying the percent VOC capture efficiency of the collection system by the percent VOC control efficiency of the thermal oxidizer and divide by 100. [District Rule 4604, 6.7.2.3] Federally Enforceable Through Title V Permit
8. Three-piece can side seam spray operations shall not use or apply any coating with a VOC content in excess of 660 grams of VOC per liter of coating, as applied, excluding water and exempt compounds. [District Rule 4604, 5.1] Federally Enforceable Through Title V Permit
9. 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): product cleaning during manufacturing process or surface preparation for coating application: 25 g/l (0.21 lb/gal), repair and maintenance cleaning: 25 g/l (0.21 lb/gal), cleaning of coating application equipment except sheet coater for three-piece cans: 25 g/l (0.21 lb/gal), cleaning of sheet coater for three-piece cans: 550 g/l (4.6 lb/gal) until 9/30/2011 and 250 g/l (2.3 lb/gal) on and after 10/1/2011. [District Rule 4604, 5.4] 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. For cleaning of coating application equipment used for sheet coating of three-piece cans, cleaning activities that are performed outside the control of an APCO-approved emission control system that meets the requirements of District Rule 4604 (9/20/07) using 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. [District Rule 4604, 5.4] Federally Enforceable Through Title V Permit
11. 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
12. Permittee shall not use VOC-containing materials 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
13. An operator 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
14. Only electrostatic, flow, roll, dip, hand application, HVLV, or other application methods with a coating transfer efficiency of at least 65% shall be used. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4604, 5.6.2]
15. Coating transfer efficiency shall be measured using a test method pursuant to Section 6.7.4 of Rule 4604 (9/20/07). [District Rule 4604, 5.6.2.7] Federally Enforceable Through Title V Permit
16. The VOC emissions due to coating and solvent usage (from this permit unit) shall be less than 100 pounds per any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
17. The PM10 emissions due to coating and solvent usage (from this permit unit) shall be less than 0.2 pounds per any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
18. The combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, N-2253-21, and N-2253-22 shall not exceed 58,579 pounds during any consecutive 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
19. The NOx emission concentration from the thermal oxidizer shall not exceed 0.098 lb/MMBtu of natural gas consumption. [District Rule 2201] Federally Enforceable Through Title V Permit
20. The SOx emission concentration from the thermal oxidizer shall not exceed 0.00285 lb/MMBtu of natural gas consumption. [District Rule 2201] Federally Enforceable Through Title V Permit
21. The PM10 emission concentration from the thermal oxidizer shall not exceed 0.0076 lb/MMBtu of natural gas consumption. [District Rule 2201] Federally Enforceable Through Title V Permit
22. The CO emission concentration from the thermal oxidizer shall not exceed 0.084 lb/MMBtu of natural gas consumption. [District Rule 2201] Federally Enforceable Through Title V Permit
23. The VOC emission concentration from the thermal oxidizer shall not exceed 0.005 lb/MMBtu of natural gas consumption. [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.

24. 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) 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 allowed 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, 6.7.1.1] Federally Enforceable Through Title V Permit
25. 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 allowed 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, 6.7.1.2] Federally Enforceable Through Title V Permit
26. The operator shall source test each collection device to determine the capture efficiency at least once five years. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
27. The capture efficiency of VOC emission collection devices 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 APCO. [District Rules 2520, 9.3.2 and 4604, 6.7.2.1] Federally Enforceable Through Title V Permit
28. The operator shall source test the thermal oxidizer at least once every twelve (12) months to demonstrate compliance with the VOC control efficiency requirements. [District Rule 2201] Federally Enforceable Through Title V Permit
29. The control efficiency of VOC emission control device(s) 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. [District Rule 4604, 6.7.2.2] Federally Enforceable Through Title V Permit
30. Source testing of the capture efficiency and control efficiency of VOC emission collection and control devices shall be performed under conditions representative of normal operating conditions and under conditions specified in the Permit-To-Operate. [District Rules 1081 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
31. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
32. 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
33. A list of the coatings, catalysts and reducers used, the mix ratio of the components used, the VOC content of each coating used (as applied) and of the VOC content of each solvent used for clean-up and surface preparation shall be kept. The list shall be made available to the District upon request. [District Rules 2520, 9.3.2 and 4604, 6.1, 6.2] Federally Enforceable Through Title V Permit
34. Daily records of the following shall be kept: (a) The specific coatings used and the mix ratio of the components added to the coatings prior to application; (b) The volume of each coating used in gallons; (c) The specific solvent used for clean-up and surface preparation; (d) The volume of each solvent used; (e) The VOC emissions due to coating and solvent usage from this permit unit; (f) The combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, N-2253-21, and N-2253-22 (g). The operating temperature of the thermal oxidizer. [District Rules 1070, 2201, 2520, 9.3.2 and 4604, 6.1, 6.2 and 40 CFR Part 64] 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. Records of the date, the time period and the reason that the thermal oxidizer is out of service shall be kept. [District Rules 2520, 9.3.2, 4604, 5.2.2, 6.3 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
36. Records of the combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, N-2253-21, and N-2253-22 shall be kept for any consecutive 12-month period. [District Rules 2201 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
37. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 2201 and 4604, 6.2, 6.3, and 6.4] 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

Previous Title V Operating Permit

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# Permit to Operate

**FACILITY:** N-2253

**EXPIRATION DATE:** 10/31/2008

**LEGAL OWNER OR OPERATOR:**  
**MAILING ADDRESS:**

BALL METAL FOOD CONTAINER CORP.  
ATTN. MANAGER PLANT ENGINEERING  
300 W. GREGER STREET  
OAKDALE, CA 95361

**FACILITY LOCATION:**

300 W GREGER ST  
OAKDALE, CA 95361-8613

**FACILITY DESCRIPTION:**

CAN & COIL MANUFACTURING

The Facility's Permit to Operate may include Facility-wide Requirements as well as requirements that apply to specific permit units.

This Permit to Operate remains valid through the permit expiration date listed above, subject to payment of annual permit fees and compliance with permit conditions and all applicable local, state, and federal regulations. This permit is valid only at the location specified above, and becomes void upon any transfer of ownership or location. Any modification of the equipment or operation, as defined in District Rule 2201, will require prior District approval. This permit shall be posted as prescribed in District Rule 2010.

Seyed Sadredin  
Executive Director / APCO

David Warner  
Director of Permit Services

# San Joaquin Valley Air Pollution Control District

FACILITY: N-2253-0-2

EXPIRATION DATE: 10/31/2008

## FACILITY-WIDE REQUIREMENTS

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1. The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1; County Rule 110 (Stanislaus)] Federally Enforceable Through Title V Permit
2. The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0; County Rule 110 (Stanislaus)] Federally Enforceable Through Title V Permit
3. The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0] Federally Enforceable Through Title V Permit
4. Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (3/21/02). [District Rule 2010, 3.0 and 4.0; and 2020] Federally Enforceable Through Title V Permit
5. The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 7.0; 2080; and 2520, 9.8.1 and 9.12.1] Federally Enforceable Through Title V Permit
6. A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District. [District Rule 2031] Federally Enforceable Through Title V Permit
7. Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District. [District Rule 2040] Federally Enforceable Through Title V Permit
8. The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit
9. The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings or electronic data. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate. Any amendments to these Facility-wide Requirements that affect specific Permit Units may constitute modification of those Permit Units.

Facility Name: BALL METAL FOOD CONTAINER CORP.  
Location: 300 W GREGER ST, OAKDALE, CA 95361-8613  
N-2253-0-2 : Oct 8 2009 4:57 PM -- NORMANR

10. The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.5.1] Federally Enforceable Through Title V Permit
11. Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520 (6/21/01). [District Rules 2520, 9.5.2 and 1100, 7.0] Federally Enforceable Through Title V Permit
12. If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.7] Federally Enforceable Through Title V Permit
13. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520, 9.8.2] Federally Enforceable Through Title V Permit
14. The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.8.3] Federally Enforceable Through Title V Permit
15. The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.8.4] Federally Enforceable Through Title V Permit
16. The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520, 9.8.5] Federally Enforceable Through Title V Permit
17. The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.9] Federally Enforceable Through Title V Permit
18. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520, 9.13.2.1] Federally Enforceable Through Title V Permit
19. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.13.2.2] Federally Enforceable Through Title V Permit
20. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520, 9.13.2.3] Federally Enforceable Through Title V Permit
21. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520, 9.13.2.4] Federally Enforceable Through Title V Permit
22. No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (11/15/01). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101, and County Rules 401 (Stanislaus)] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

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

23. No person shall manufacture, blend, repackage, supply, sell, solicit or apply any architectural coating with a VOC content in excess of the corresponding limit specified in the Table of Standards of District Rule 4601 (10/31/01) for use or sale within the District. [District Rule 4601, 5.1] Federally Enforceable Through Title V Permit
24. All VOC-containing materials for architectural coatings subject to Rule 4601 (10/31/01) shall be stored in closed containers when not in use. [District Rule 4601, 5.4] Federally Enforceable Through Title V Permit
25. The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.3 (10/31/01). [District Rule 4601, 6.1 and 6.3] Federally Enforceable Through Title V Permit
26. With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.13.1 and 10.0] Federally Enforceable Through Title V Permit
27. If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit
28. If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR 82, Subpart B. [40 CFR 82, Subpart B] Federally Enforceable Through Title V Permit
29. Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8021 and 8011] Federally Enforceable Through Title V Permit
30. Outdoor handling, storage and transport of any bulk material which emits dust shall comply with the requirements of District Rule 8031, unless specifically exempted under Section 4.0 of Rule 8031 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8031 and 8011] Federally Enforceable Through Title V Permit
31. An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8041 and 8011] Federally Enforceable Through Title V Permit
32. Whenever open areas are disturbed or vehicles are used in open areas, the facility shall comply with the requirements of Section 5.0 of District Rule 8051, unless specifically exempted under Section 4.0 of Rule 8051 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8051 and 8011] Federally Enforceable Through Title V Permit
33. Any paved road or unpaved road shall comply with the requirements of District Rule 8061 unless specifically exempted under Section 4.0 of Rule 8061 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8061 and Rule 8011] Federally Enforceable Through Title V Permit
34. Any unpaved vehicle/equipment area that anticipates more than 75 vehicle trips per day shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 100 vehicle trips per day shall comply with the requirements of Section 5.1.2 of District Rule 8071. All sources shall comply with the requirements of Section 5.0 of District Rule 8071 unless specifically exempted under Section 4.0 of Rule 8071 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8071 and Rule 8011] Federally Enforceable Through Title V Permit
35. Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation). [40 CFR 61 Subpart M] Federally Enforceable Through Title V Permit

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

36. The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit
37. The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V Permit
38. When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit
39. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following outdated SIP requirements: Rule 401 (Stanislaus), Rule 110 (Stanislaus) and Rule 202 (Stanislaus). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
40. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2040 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (11/15/01); 4601, sections 5.1, 5.2, 5.3, 5.8 and 8.0 (10/31/01); 8021 (11/15/01); 8031 (11/15/01); 8041 (11/15/01); 8051 (11/15/01); 8061 (11/15/01); and 8071 (11/15/01). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
41. On November 30, 2003, the initial Title V permit was issued. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report are based upon this initial permit issuance date, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days after the end of the reporting period. [District Rule 2520, 9.5] Federally Enforceable Through Title V Permit
42. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
43. When applicable to 40 CFR Part 68, a subject facility shall submit to the proper authority a Risk Management Plan when mandated by the regulation. [40 CFR Part 68] Federally Enforceable Through Title V Permit
44. Any person subject to the provision of District Rule 4604, Sections 5.2.2, 5.4.1, or 5.4.2 (12/20/01), shall submit to the APCO for approval an Operation and Maintenance (O/M) plan. Such a plan will include operation temperatures, maintenance schedule, cleaning/recharging schedules, dust inspection schedules and any other information assuring continuous compliance with this rule. [District Rule 4604, 6.8] Federally Enforceable Through Title V Permit
45. Stationary source (as defined in 40 CFR 63.2 - Definitions) emissions shall be less than 10 tons per year of each single hazardous air pollutant (HAP) (as defined in 40 CFR 63.2 - Definitions) and less than 25 tons per year for any combination of HAPs. A year, for this condition, is any consecutive 12 month period based on a monthly rolling total. [District NSR Rule] Federally Enforceable Through Title V Permit
46. The owner/operator shall calculate and maintain records on a monthly basis of the quantity of each HAP emitted into the atmosphere from all sources at the facility. The HAP emissions shall be totaled for a rolling consecutive 12-month period. The records shall include an analysis (or other information) sufficiently detailed to allow the District Personal to make a finding about the source's applicability status with regard to the relevant standard or other requirement. [District NSR Rule and District Rule 2520 9.3.2] Federally Enforceable Through Title V Permit
47. The Permittee shall submit a semi annual summary report of HAP emissions report District. This report shall submitted along with semi-annual monitoring report. The report shall contain the following: (i) the monthly individual HAP and total HAP emissions for the previous 17 months and (ii) the totals for the six 12-consecutive month periods of individual HAP and total HAP emissions (i.e., one for each of the months of the reporting period). [District Rule 2520, 9.3.2] 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-2253-1-6

**EXPIRATION DATE:** 10/31/2008

**EQUIPMENT DESCRIPTION:**

SIDE SEAM STRIPE SPRAY OPERATION (LINE #1) SERVED BY ONE SOUDRONIC MODEL FBB BODYMAKER AND ONE 0.6 MMBTU/HR FLYNN AERO FLAME AF-9 CURING TUNNEL. THE FUME HOOD (OVER THE COATING APPLICATOR AND CONVEYOR) AND CURING TUNNEL IS VENTED TO THE SHARED 8.0 MMBTU/HR SMITH THERMAL OXIDIZER

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] 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. The VOC contaminated air stream from the side seam stripe coater, conveyor between the coater and curing tunnel, and curing tunnel shall be vented to the thermal oxidizer at all times except when the thermal oxidizer is undergoing maintenance. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The collection system for fugitive VOC emissions from the side seam stripe coater, conveyor between the coater and curing tunnel, and curing tunnel shall have a minimum overall capture efficiency of 71%. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The thermal oxidizer shall be maintained at a minimum temperature of 1,490 Degrees F to provide at least 98.5% VOC control. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The thermal oxidizer shall be equipped with a continuous temperature monitoring and recording device. [District NSR Rule, Rules 2520, 9.3.2, 4604, 6.3 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
7. The overall VOC capture and control efficiency shall be calculated by multiplying the percent VOC capture efficiency of the collection system by the percent VOC control efficiency of the thermal oxidizer and divide by 100. [District NSR Rule and Rule 4604, 6.7.2.3] Federally Enforceable Through Title V Permit
8. Three-piece can side seam spray operations shall not use or apply any coating with a VOC content in excess of 660 grams of VOC per liter of coating, as applied, excluding water and exempt compounds. [District Rule 4604, 5.1] Federally Enforceable Through Title V Permit
9. VOC content of solvents used shall not exceed any of the following limits: product cleaning during manufacturing process or surface preparation for coating application: 50 g/l (0.42 lb/gal), repair and maintenance cleaning: 50 g/l (0.42 lb/gal), and cleaning of coating application equipment: 550 g/l (4.6 lb/gal). [District Rule 4604, 5.4.3] 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. Cleaning activities that use solvents with a VOC content greater than 50 g/l (0.42 lb/gallon) shall be performed by one or more of the following methods: wipe cleaning; application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force; 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 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. [District Rule 4604, 5.4.5] Federally Enforceable Through Title V Permit
11. 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 5.4.5.2 of Rule 4604. [District Rule 4604, 5.4.6] Federally Enforceable Through Title V Permit
12. Permittee shall not use VOC-containing materials 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, 5.4.7] Federally Enforceable Through Title V Permit
13. 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 containers are empty. [District Rule 4604, 5.4.9] Federally Enforceable Through Title V Permit
14. Coating transfer efficiency shall be at least 65% as measured using a test method pursuant to Section 6.7.5 of Rule 4604. [District Rule 4604, 5.5.3 & 5.5.4] Federally Enforceable Through Title V Permit
15. The VOC emissions due to coating and solvent usage (from this permit unit) shall not exceed 250 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
16. The PM10 emissions due to coating and solvent usage (from this permit unit) shall not exceed 0.4 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
17. The combined daily VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, and N-2253-21, shall not exceed 250 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
18. The combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, and N-2253-21, shall not exceed 58,579 pounds during any consecutive 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
19. The NOx emission concentration from the thermal oxidizer shall not exceed 0.098 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
20. The CO emission concentration from the thermal oxidizer shall not exceed 0.082 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
21. The VOC emission concentration from the thermal oxidizer shall not exceed 0.005 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
22. The SOx emission concentration from the thermal oxidizer shall not exceed 0.00285 lb/MMBtu of natural gas consumption. [District NSR Rule and Rule 4801, 3.1]
23. The PM10 emission concentration from the thermal oxidizer shall not exceed 0.0076 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
24. A list of the coatings, catalysts and reducers used, the mix ratio of the components used, the VOC content of each coating used (as applied) and of the VOC content of each solvent used for clean-up and surface preparation shall be kept. The list shall be made available to the District upon request. [District Rules 2520, 9.3.2 and 4604, 6.1, 6.2] 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. Daily records of the following shall be kept: (a) The specific coatings used and the mix ratio of the components added to the coatings prior to application; (b) The volume of each coating used in gallons; (c) The specific solvent used for clean-up and surface preparation; (d) The volume of each solvent used; (e) The VOC emissions due to coating and solvent usage from this permit unit; (f) The combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, and N-2253-21; (g) The operating temperature of the thermal oxidizer. [District Rules 1070, 2520, 9.3.2 and 4604, 6.1, 6.2 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
26. Records of the date, the time period and the reason that the thermal oxidizer is out of service shall be kept. [District NSR Rule, Rules 2520, 9.3.2, 4604, 5.2.2, 6.3 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
27. Records of the combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, and N-2253-21 shall be kept for any consecutive 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
28. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 4604] Federally Enforceable Through Title V Permit
29. 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) 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 allowed in District Rule 4604, Section 3.0 (1/15/04). 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, 6.7.1.1] Federally Enforceable Through Title V Permit
30. 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 allowed in District Rule 4604, Section 3.0 (1/15/04). 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, 6.7.1.2] Federally Enforceable Through Title V Permit
31. The capture efficiency shall be tested every five years. The capture efficiency of each collection device shall be determined according to the EPA's document "Guidelines for Determining Capture Efficiency," dated January 9, 1995. An equivalent alternate test method that has been approved by EPA, ARB and the APCO may be used. [District Rule 2520, 9.3.2, and District Rule 4604, 6.7.2.1] Federally Enforceable Through Title V Permit
32. Source testing to demonstrate compliance with the VOC destruction efficiency of the thermal oxidizer shall be conducted on an annual basis. [District Rule 2201] Federally Enforceable Through Title V Permit
33. Source testing to determine the destruction efficiency of the thermal oxidizer shall be conducted using EPA Methods 2, 2A, or 2D for measuring flow rates and EPA Methods 25, 25A, or 25C for measuring total gaseous organic concentrations at the inlet and outlet of the control device. [District Rule 4604, 6.7.2.2] Federally Enforceable Through Title V Permit
34. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
35. 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

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-2253-2-6

**EXPIRATION DATE:** 10/31/2008

**EQUIPMENT DESCRIPTION:**

SIDE SEAM STRIPE SPRAY OPERATION (LINE #2) SERVED BY ONE SOUDRONIC MODEL FBB BODYMAKER AND ONE 0.6 MMBTU/HR FLYNN AERO FLAME AF-9 CURING TUNNEL. THE FUME HOOD (OVER THE COATING APPLICATOR AND CONVEYOR) AND CURING TUNNEL IS VENTED TO THE SHARED THERMAL OXIDIZER

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] 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. The VOC contaminated air stream from the side seam stripe coater, conveyor between the coater and curing tunnel, and curing tunnel shall be vented to the thermal oxidizer at all times except when the thermal oxidizer is undergoing maintenance. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The collection system for fugitive VOC emissions from the side seam stripe coater, conveyor between the coater and curing tunnel, and curing tunnel shall have a minimum overall capture efficiency of 71%. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The thermal oxidizer shall be maintained at a minimum temperature of 1,490 Degrees F to provide at least 98.5% VOC control. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The thermal oxidizer shall be equipped with a continuous temperature monitoring and recording device. [District NSR Rule, Rules 2520, 9.3.2, 4604, 6.3 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
7. The overall VOC capture and control efficiency shall be calculated by multiplying the percent VOC capture efficiency of the collection system by the percent VOC control efficiency of the thermal oxidizer and divide by 100. [District NSR Rule and Rule 4604, 6.7.2.3] Federally Enforceable Through Title V Permit
8. Three-piece can side seam spray operations shall not use or apply any coating with a VOC content in excess of 660 grams of VOC per liter of coating, as applied, excluding water and exempt compounds. [District Rule 4604, 5.1] Federally Enforceable Through Title V Permit
9. VOC content of solvents used shall not exceed any of the following limits: product cleaning during manufacturing process or surface preparation for coating application: 50 g/l (0.42 lb/gal), repair and maintenance cleaning: 50 g/l (0.42 lb/gal), and cleaning of coating application equipment: 550 g/l (4.6 lb/gal). [District Rule 4604, 5.4.3] 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. Cleaning activities that use solvents with a VOC content greater than 50 g/l (0.42 lb/gallon) shall be performed by one or more of the following methods: wipe cleaning; application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force; 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 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. [District Rule 4604, 5.4.5] Federally Enforceable Through Title V Permit
11. 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 5.4.5.2 of Rule 4604. [District Rule 4604, 5.4.6] Federally Enforceable Through Title V Permit
12. Permittee shall not use VOC-containing materials 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, 5.4.7] Federally Enforceable Through Title V Permit
13. 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, 5.4.9] Federally Enforceable Through Title V Permit
14. Coating transfer efficiency shall be at least 65% as measured using a test method pursuant to Section 6.7.5 of Rule 4604. [District Rule 4604, 5.5.3 & 5.5.4] Federally Enforceable Through Title V Permit
15. The VOC emissions due to coating and solvent usage (from this permit unit) shall not exceed 250 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
16. The PM10 emissions due to coating and solvent usage (from this permit unit) shall not exceed 0.4 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
17. The combined daily VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, and N-2253-21, shall not exceed 250 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
18. The combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, and N-2253-21, shall not exceed 58,579 pounds during any consecutive 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
19. The NOx emission concentration from the thermal oxidizer shall not exceed 0.098 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
20. The CO emission concentration from the thermal oxidizer shall not exceed 0.082 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
21. The VOC emission concentration from the thermal oxidizer shall not exceed 0.005 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
22. The SOx emission concentration from the thermal oxidizer shall not exceed 0.00285 lb/MMBtu of natural gas consumption. [District NSR Rule and Rule 4801, 3.1]
23. The PM10 emission concentration from the thermal oxidizer shall not exceed 0.0076 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
24. A list of the coatings, catalysts and reducers used, the mix ratio of the components used, the VOC content of each coating used (as applied) and of the VOC content of each solvent used for clean-up and surface preparation shall be kept. The list shall be made available to the District upon request. [District Rules 2520, 9.3.2 and 4604, 6.1, 6.2] 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. Daily records of the following shall be kept: (a) The specific coatings used and the mix ratio of the components added to the coatings prior to application; (b) The volume of each coating used in gallons; (c) The specific solvent used for clean-up and surface preparation; (d) The volume of each solvent used; (e) The VOC emissions due to coating and solvent usage from this permit unit; (f) The combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, and N-2253-21; (g) The operating temperature of the thermal oxidizer. [District Rules 1070, 2520, 9.3.2 and 4604, 6.1, 6.2 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
26. Records of the date, the time period and the reason that the thermal oxidizer is out of service shall be kept. [District NSR Rule, Rules 2520, 9.3.2, 4604, 5.2.2, 6.3 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
27. Records of the combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, and N-2253-21 shall be kept for any consecutive 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
28. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 4604] Federally Enforceable Through Title V Permit
29. 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) 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 allowed in District Rule 4604, Section 3.0 (1/15/04). 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, 6.7.1.1] Federally Enforceable Through Title V Permit
30. 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 allowed in District Rule 4604, Section 3.0 (1/15/04). 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, 6.7.1.2] Federally Enforceable Through Title V Permit
31. The capture efficiency shall be tested every five years. The capture efficiency of each collection device shall be determined according to the EPA's document "Guidelines for Determining Capture Efficiency," dated January 9, 1995. An equivalent alternate test method that has been approved by EPA, ARB and the APCO may be used. [District Rule 2520, 9.3.2, and District Rule 4604, 6.7.2.1] Federally Enforceable Through Title V Permit
32. Source testing to demonstrate compliance with the VOC destruction efficiency of the thermal oxidizer shall be conducted on an annual basis. [District Rule 2201] Federally Enforceable Through Title V Permit
33. Source testing to determine the destruction efficiency of the thermal oxidizer shall be conducted using EPA Methods 2, 2A, or 2D for measuring flow rates and EPA Methods 25, 25A, or 25C for measuring total gaseous organic concentrations at the inlet and outlet of the control device. [District Rule 4604, 6.7.2.2] Federally Enforceable Through Title V Permit
34. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
35. 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

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-2253-3-6

**EXPIRATION DATE:** 10/31/2008

**EQUIPMENT DESCRIPTION:**

SIDE SEAM STRIPE SPRAY OPERATION (LINE #3) SERVED BY ONE SOUDRONIC MODEL FBB BODYMAKER AND ONE 0.6 MMBTU/HR FLYNN AERO FLAME AF-9 CURING TUNNEL. THE FUME HOOD (OVER THE COATING APPLICATOR AND CONVEYOR) AND CURING TUNNEL IS VENTED TO THE SHARED THERMAL OXIDIZER

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] 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. The VOC contaminated air stream from the side seam stripe coater, conveyor between the coater and curing tunnel, and curing tunnel shall be vented to the thermal oxidizer at all times except when the thermal oxidizer is undergoing maintenance. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The collection system for fugitive VOC emissions from the side seam stripe coater, conveyor between the coater and curing tunnel, and curing tunnel shall have a minimum overall capture efficiency of 71%. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The thermal oxidizer shall be maintained at a minimum temperature of 1,490 Degrees F to provide at least 98.5% VOC control. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The thermal oxidizer shall be equipped with a continuous temperature monitoring and recording device. [District NSR Rule, Rules 2520, 9.3.2, 4604, 6.3 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
7. The overall VOC capture and control efficiency shall be calculated by multiplying the percent VOC capture efficiency of the collection system by the percent VOC control efficiency of the thermal oxidizer and divide by 100. [District NSR Rule and Rule 4604, 6.7.2.3] Federally Enforceable Through Title V Permit
8. Three-piece can side seam spray operations shall not use or apply any coating with a VOC content in excess of 660 grams of VOC per liter of coating, as applied, excluding water and exempt compounds. [District Rule 4604, 5.1] Federally Enforceable Through Title V Permit
9. VOC content of solvents used shall not exceed any of the following limits: product cleaning during manufacturing process or surface preparation for coating application: 50 g/l (0.42 lb/gal), repair and maintenance cleaning: 50 g/l (0.42 lb/gal), and cleaning of coating application equipment: 550 g/l (4.6 lb/gal). [District Rule 4604, 5.4.3] 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. Cleaning activities that use solvents with a VOC content greater than 50 g/l (0.42 lb/gallon) shall be performed by one or more of the following methods: wipe cleaning; application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force; 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 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. [District Rule 4604, 5.4.5] Federally Enforceable Through Title V Permit
11. 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 5.4.5.2 of Rule 4604. [District Rule 4604, 5.4.6] Federally Enforceable Through Title V Permit
12. Permittee shall not use VOC-containing materials 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, 5.4.7] Federally Enforceable Through Title V Permit
13. 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, 5.4.9] Federally Enforceable Through Title V Permit
14. Coating transfer efficiency shall be at least 65% as measured using a test method pursuant to Section 6.7.5 of Rule 4604. [District Rule 4604, 5.5.3 & 5.5.4] Federally Enforceable Through Title V Permit
15. The VOC emissions due to coating and solvent usage (from this permit unit) shall not exceed 250 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
16. The PM10 emissions due to coating and solvent usage (from this permit unit) shall not exceed 0.4 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
17. The combined daily VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, and N-2253-21, shall not exceed 250 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
18. The combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, and N-2253-21, shall not exceed 58,579 pounds during any consecutive 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
19. The NOx emission concentration from the thermal oxidizer shall not exceed 0.098 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
20. The CO emission concentration from the thermal oxidizer shall not exceed 0.082 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
21. The VOC emission concentration from the thermal oxidizer shall not exceed 0.005 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
22. The SOx emission concentration from the thermal oxidizer shall not exceed 0.00285 lb/MMBtu of natural gas consumption. [District NSR Rule and Rule 4801, 3.1]
23. The PM10 emission concentration from the thermal oxidizer shall not exceed 0.0076 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
24. A list of the coatings, catalysts and reducers used, the mix ratio of the components used, the VOC content of each coating used (as applied) and of the VOC content of each solvent used for clean-up and surface preparation shall be kept. The list shall be made available to the District upon request. [District Rules 2520, 9.3.2 and 4604, 6.1, 6.2] 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. Daily records of the following shall be kept: (a) The specific coatings used and the mix ratio of the components added to the coatings prior to application; (b) The volume of each coating used in gallons; (c) The specific solvent used for clean-up and surface preparation; (d) The volume of each solvent used; (e) The VOC emissions due to coating and solvent usage from this permit unit; (f) The combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, and N-2253-21; (g) The operating temperature of the thermal oxidizer. [District Rules 1070, 2520, 9.3.2 and 4604, 6.1, 6.2 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
26. Records of the date, the time period and the reason that the thermal oxidizer is out of service shall be kept. [District NSR Rule, Rules 2520, 9.3.2, 4604, 5.2.2, 6.3 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
27. Records of the combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, and N-2253-21 shall be kept for any consecutive 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
28. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 4604] Federally Enforceable Through Title V Permit
29. 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) 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 allowed in District Rule 4604, Section 3.0 (1/15/04). 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, 6.7.1.1] Federally Enforceable Through Title V Permit
30. 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 allowed in District Rule 4604, Section 3.0 (1/15/04). 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, 6.7.1.2] Federally Enforceable Through Title V Permit
31. The capture efficiency shall be tested every five years. The capture efficiency of each collection device shall be determined according to the EPA's document "Guidelines for Determining Capture Efficiency," dated January 9, 1995. An equivalent alternate test method that has been approved by EPA, ARB and the APCO may be used. [District Rule 2520, 9.3.2, and District Rule 4604, 6.7.2.1] Federally Enforceable Through Title V Permit
32. Source testing to demonstrate compliance with the VOC destruction efficiency of the thermal oxidizer shall be conducted on an annual basis. [District Rule 2201] Federally Enforceable Through Title V Permit
33. Source testing to determine the destruction efficiency of the thermal oxidizer shall be conducted using EPA Methods 2, 2A, or 2D for measuring flow rates and EPA Methods 25, 25A, or 25C for measuring total gaseous organic concentrations at the inlet and outlet of the control device. [District Rule 4604, 6.7.2.2] Federally Enforceable Through Title V Permit
34. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
35. 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

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

# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-2253-4-6

EXPIRATION DATE: 10/31/2008

## EQUIPMENT DESCRIPTION:

SIDE SEAM STRIPE SPRAY OPERATION (LINE #4) SERVED BY ONE ABM 420 BODYMAKER AND ONE 0.6 MMBTU/HR FLYNN AERO FLAME AF-9 CURING TUNNEL. THE FUME HOOD (OVER THE COATING APPLICATOR AND CONVEYOR) AND CURING TUNNEL IS VENTED TO THE SHARED THERMAL OXIDIZER

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] 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. The VOC contaminated air stream from the side seam stripe coater, conveyor between the coater and curing tunnel, and curing tunnel shall be vented to the thermal oxidizer at all times except when the thermal oxidizer is undergoing maintenance. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The collection system for fugitive VOC emissions from the side seam stripe coater, conveyor between the coater and curing tunnel, and curing tunnel shall have a minimum overall capture efficiency of 71%. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The thermal oxidizer shall be maintained at a minimum temperature of 1,490 Degrees F to provide at least 98.5% VOC control. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The thermal oxidizer shall be equipped with a continuous temperature monitoring and recording device. [District NSR Rule, Rules 2520, 9.3.2, 4604, 6.3 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
7. The overall VOC capture and control efficiency shall be calculated by multiplying the percent VOC capture efficiency of the collection system by the percent VOC control efficiency of the thermal oxidizer and divide by 100. [District NSR Rule and Rule 4604, 6.7.2.3] Federally Enforceable Through Title V Permit
8. Three-piece can side seam spray operations shall not use or apply any coating with a VOC content in excess of 660 grams of VOC per liter of coating, as applied, excluding water and exempt compounds. [District Rule 4604, 5.1] Federally Enforceable Through Title V Permit
9. VOC content of solvents used shall not exceed any of the following limits: product cleaning during manufacturing process or surface preparation for coating application: 50 g/l (0.42 lb/gal), repair and maintenance cleaning: 50 g/l (0.42 lb/gal), and cleaning of coating application equipment: 550 g/l (4.6 lb/gal). [District Rule 4604, 5.4.3] 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. Cleaning activities that use solvents with a VOC content greater than 50 g/l (0.42 lb/gallon) shall be performed by one or more of the following methods: wipe cleaning; application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force; 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 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. [District Rule 4604, 5.4.5] Federally Enforceable Through Title V Permit
11. 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 5.4.5.2 of Rule 4604. [District Rule 4604, 5.4.6] Federally Enforceable Through Title V Permit
12. Permittee shall not use VOC-containing materials 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, 5.4.7] Federally Enforceable Through Title V Permit
13. 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, 5.4.9] Federally Enforceable Through Title V Permit
14. Coating transfer efficiency shall be at least 65% as measured using a test method pursuant to Section 6.7.5 of Rule 4604. [District Rule 4604, 5.5.3 & 5.5.4] Federally Enforceable Through Title V Permit
15. The VOC emissions due to coating and solvent usage (from this permit unit) shall not exceed 250 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
16. The PM10 emissions due to coating and solvent usage (from this permit unit) shall not exceed 0.4 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
17. The combined daily VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, and N-2253-21, shall not exceed 250 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
18. The combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, and N-2253-21, shall not exceed 58,579 pounds during any consecutive 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
19. The NOx emission concentration from the thermal oxidizer shall not exceed 0.098 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
20. The CO emission concentration from the thermal oxidizer shall not exceed 0.082 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
21. The VOC emission concentration from the thermal oxidizer shall not exceed 0.005 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
22. The SOx emission concentration from the thermal oxidizer shall not exceed 0.00285 lb/MMBtu of natural gas consumption. [District NSR Rule and Rule 4801, 3.1]
23. The PM10 emission concentration from the thermal oxidizer shall not exceed 0.0076 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
24. A list of the coatings, catalysts and reducers used, the mix ratio of the components used, the VOC content of each coating used (as applied) and of the VOC content of each solvent used for clean-up and surface preparation shall be kept. The list shall be made available to the District upon request. [District Rules 2520, 9.3.2 and 4604, 6.1, 6.2] 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. Daily records of the following shall be kept: (a) The specific coatings used and the mix ratio of the components added to the coatings prior to application; (b) The volume of each coating used in gallons; (c) The specific solvent used for clean-up and surface preparation; (d) The volume of each solvent used; (e) The VOC emissions due to coating and solvent usage from this permit unit; (f) The combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, and N-2253-21; (g) The operating temperature of the thermal oxidizer. [District Rules 1070, 2520, 9.3.2 and 4604, 6.1, 6.2 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
26. Records of the date, the time period and the reason that the thermal oxidizer is out of service shall be kept. [District NSR Rule, Rules 2520, 9.3.2, 4604, 5.2.2, 6.3 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
27. Records of the combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, and N-2253-21 shall be kept for any consecutive 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
28. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 4604] Federally Enforceable Through Title V Permit
29. 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) 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 allowed in District Rule 4604, Section 3.0 (1/15/04). 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, 6.7.1.1] Federally Enforceable Through Title V Permit
30. 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 allowed in District Rule 4604, Section 3.0 (1/15/04). 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, 6.7.1.2] Federally Enforceable Through Title V Permit
31. The capture efficiency shall be tested every five years. The capture efficiency of each collection device shall be determined according to the EPA's document "Guidelines for Determining Capture Efficiency," dated January 9, 1995. An equivalent alternate test method that has been approved by EPA, ARB and the APCO may be used. [District Rule 2520, 9.3.2, and District Rule 4604, 6.7.2.1] Federally Enforceable Through Title V Permit
32. Source testing to demonstrate compliance with the VOC destruction efficiency of the thermal oxidizer shall be conducted on an annual basis. [District Rule 2201] Federally Enforceable Through Title V Permit
33. Source testing to determine the destruction efficiency of the thermal oxidizer shall be conducted using EPA Methods 2, 2A, or 2D for measuring flow rates and EPA Methods 25, 25A, or 25C for measuring total gaseous organic concentrations at the inlet and outlet of the control device. [District Rule 4604, 6.7.2.2] Federally Enforceable Through Title V Permit
34. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
35. 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

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

# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-2253-6-6

EXPIRATION DATE: 10/31/2008

## EQUIPMENT DESCRIPTION:

SIDE SEAM STRIPE SPRAY OPERATION (LINE #6) SERVED BY ONE SBW 270 BODYMAKER AND ONE 0.6 MMBTU/HR FLYNN AERO FLAME AF-9 CURING TUNNEL. THE FUME HOOD (OVER THE COATING APPLICATOR AND CONVEYOR) AND CURING TUNNEL IS VENTED TO THE SHARED THERMAL OXIDIZER

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] 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. The VOC contaminated air stream from the side seam stripe coater, conveyor between the coater and curing tunnel, and curing tunnel shall be vented to the thermal oxidizer at all times except when the thermal oxidizer is undergoing maintenance. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The collection system for fugitive VOC emissions from the side seam stripe coater, conveyor between the coater and curing tunnel, and curing tunnel shall have a minimum overall capture efficiency of 71%. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The thermal oxidizer shall be maintained at a minimum temperature of 1,490 Degrees F to provide at least 98.5% VOC control. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The thermal oxidizer shall be equipped with a continuous temperature monitoring and recording device. [District NSR Rule, Rules 2520, 9.3.2, 4604, 6.3 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
7. The overall VOC capture and control efficiency shall be calculated by multiplying the percent VOC capture efficiency of the collection system by the percent VOC control efficiency of the thermal oxidizer and divide by 100. [District NSR Rule and Rule 4604, 6.7.2.3] Federally Enforceable Through Title V Permit
8. Three-piece can side seam spray operations shall not use or apply any coating with a VOC content in excess of 660 grams of VOC per liter of coating, as applied, excluding water and exempt compounds. [District Rule 4604, 5.1] Federally Enforceable Through Title V Permit
9. VOC content of solvents used shall not exceed any of the following limits: product cleaning during manufacturing process or surface preparation for coating application: 50 g/l (0.42 lb/gal), repair and maintenance cleaning: 50 g/l (0.42 lb/gal), and cleaning of coating application equipment: 550 g/l (4.6 lb/gal). [District Rule 4604, 5.4.3] 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. Cleaning activities that use solvents with a VOC content greater than 50 g/l (0.42 lb/gallon) shall be performed by one or more of the following methods: wipe cleaning; application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force; 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 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. [District Rule 4604, 5.4.5] Federally Enforceable Through Title V Permit
11. 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 5.4.5.2 of Rule 4604. [District Rule 4604, 5.4.6] Federally Enforceable Through Title V Permit
12. Permittee shall not use VOC-containing materials 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, 5.4.7] Federally Enforceable Through Title V Permit
13. 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, 5.4.9] Federally Enforceable Through Title V Permit
14. Coating transfer efficiency shall be at least 65% as measured using a test method pursuant to Section 6.7.5 of Rule 4604. [District Rule 4604, 5.5.3 & 5.5.4] Federally Enforceable Through Title V Permit
15. The VOC emissions due to coating and solvent usage (from this permit unit) shall not exceed 250 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
16. The PM10 emissions due to coating and solvent usage (from this permit unit) shall not exceed 0.4 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
17. The combined daily VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, and N-2253-21, shall not exceed 250 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
18. The combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, and N-2253-21, shall not exceed 58,579 pounds during any consecutive 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
19. The NOx emission concentration from the thermal oxidizer shall not exceed 0.098 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
20. The CO emission concentration from the thermal oxidizer shall not exceed 0.082 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
21. The VOC emission concentration from the thermal oxidizer shall not exceed 0.005 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
22. The SOx emission concentration from the thermal oxidizer shall not exceed 0.00285 lb/MMBtu of natural gas consumption. [District NSR Rule and Rule 4801, 3.1]
23. The PM10 emission concentration from the thermal oxidizer shall not exceed 0.0076 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
24. A list of the coatings, catalysts and reducers used, the mix ratio of the components used, the VOC content of each coating used (as applied) and of the VOC content of each solvent used for clean-up and surface preparation shall be kept. The list shall be made available to the District upon request. [District Rules 2520, 9.3.2 and 4604, 6.1, 6.2] 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. Daily records of the following shall be kept: (a) The specific coatings used and the mix ratio of the components added to the coatings prior to application; (b) The volume of each coating used in gallons; (c) The specific solvent used for clean-up and surface preparation; (d) The volume of each solvent used; (e) The VOC emissions due to coating and solvent usage from this permit unit; (f) The combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, and N-2253-21; (g) The operating temperature of the thermal oxidizer. [District Rules 1070, 2520, 9.3.2 and 4604, 6.1, 6.2 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
26. Records of the date, the time period and the reason that the thermal oxidizer is out of service shall be kept. [District NSR Rule, Rules 2520, 9.3.2, 4604, 5.2.2, 6.3 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
27. Records of the combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, and N-2253-21 shall be kept for any consecutive 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
28. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 4604] Federally Enforceable Through Title V Permit
29. 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) 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 allowed in District Rule 4604, Section 3.0 (1/15/04). 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, 6.7.1.1] Federally Enforceable Through Title V Permit
30. 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 allowed in District Rule 4604, Section 3.0 (1/15/04). 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, 6.7.1.2] Federally Enforceable Through Title V Permit
31. The capture efficiency shall be tested every five years. The capture efficiency of each collection device shall be determined according to the EPA's document "Guidelines for Determining Capture Efficiency," dated January 9, 1995. An equivalent alternate test method that has been approved by EPA, ARB and the APCO may be used. [District Rule 2520, 9.3.2, and District Rule 4604, 6.7.2.1] Federally Enforceable Through Title V Permit
32. Source testing to demonstrate compliance with the VOC destruction efficiency of the thermal oxidizer shall be conducted on an annual basis. [District Rule 2201] Federally Enforceable Through Title V Permit
33. Source testing to determine the destruction efficiency of the thermal oxidizer shall be conducted using EPA Methods 2, 2A, or 2D for measuring flow rates and EPA Methods 25, 25A, or 25C for measuring total gaseous organic concentrations at the inlet and outlet of the control device. [District Rule 4604, 6.7.2.2] Federally Enforceable Through Title V Permit
34. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
35. 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

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

# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-2253-7-6

EXPIRATION DATE: 10/31/2008

## EQUIPMENT DESCRIPTION:

SIDE SEAM STRIPE SPRAY OPERATION (LINE #7) SERVED BY ONE SOUDRONIC MODEL FBB BODYMAKER AND ONE 0.4 MMBTU/HR SARDEE SLIX-3 CURING TUNNEL. THE FUME HOOD (OVER THE COATING APPLICATOR AND CONVEYOR) AND CURING TUNNEL IS VENTED TO THE SHARED THERMAL OXIDIZER

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] 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. The VOC contaminated air stream from the side seam stripe coater, conveyor between the coater and curing tunnel, and curing tunnel shall be vented to the thermal oxidizer at all times except when the thermal oxidizer is undergoing maintenance. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The collection system for fugitive VOC emissions from the side seam stripe coater, conveyor between the coater and curing tunnel, and curing tunnel shall have a minimum overall capture efficiency of 71%. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The thermal oxidizer shall be maintained at a minimum temperature of 1,490 Degrees F to provide at least 98.5% VOC control. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The thermal oxidizer shall be equipped with a continuous temperature monitoring and recording device. [District NSR Rule, Rules 2520, 9.3.2, 4604, 6.3 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
7. The overall VOC capture and control efficiency shall be calculated by multiplying the percent VOC capture efficiency of the collection system by the percent VOC control efficiency of the thermal oxidizer and divide by 100. [District NSR Rule and Rule 4604, 6.7.2.3] Federally Enforceable Through Title V Permit
8. Three-piece can side seam spray operations shall not use or apply any coating with a VOC content in excess of 660 grams of VOC per liter of coating, as applied, excluding water and exempt compounds. [District Rule 4604, 5.1] Federally Enforceable Through Title V Permit
9. VOC content of solvents used shall not exceed any of the following limits: product cleaning during manufacturing process or surface preparation for coating application: 50 g/l (0.42 lb/gal), repair and maintenance cleaning: 50 g/l (0.42 lb/gal), and cleaning of coating application equipment: 550 g/l (4.6 lb/gal). [District Rule 4604, 5.4.3] 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. Cleaning activities that use solvents with a VOC content greater than 50 g/l (0.42 lb/gallon) shall be performed by one or more of the following methods: wipe cleaning; application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force; 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 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. [District Rule 4604, 5.4.5] Federally Enforceable Through Title V Permit
11. 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 5.4.5.2 of Rule 4604. [District Rule 4604, 5.4.6] Federally Enforceable Through Title V Permit
12. Permittee shall not use VOC-containing materials 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, 5.4.7] Federally Enforceable Through Title V Permit
13. 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, 5.4.9] Federally Enforceable Through Title V Permit
14. Coating transfer efficiency shall be at least 65% as measured using a test method pursuant to Section 6.7.5 of Rule 4604. [District Rule 4604, 5.5.3 & 5.5.4] Federally Enforceable Through Title V Permit
15. The VOC emissions due to coating and solvent usage (from this permit unit) shall not exceed 250 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
16. The PM10 emissions due to coating and solvent usage (from this permit unit) shall not exceed 0.4 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
17. The combined daily VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, and N-2253-21, shall not exceed 250 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
18. The combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, and N-2253-21, shall not exceed 58,579 pounds during any consecutive 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
19. The NOx emission concentration from the thermal oxidizer shall not exceed 0.098 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
20. The CO emission concentration from the thermal oxidizer shall not exceed 0.082 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
21. The VOC emission concentration from the thermal oxidizer shall not exceed 0.005 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
22. The SOx emission concentration from the thermal oxidizer shall not exceed 0.00285 lb/MMBtu of natural gas consumption. [District NSR Rule and Rule 4801, 3.1]
23. The PM10 emission concentration from the thermal oxidizer shall not exceed 0.0076 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
24. A list of the coatings, catalysts and reducers used, the mix ratio of the components used, the VOC content of each coating used (as applied) and of the VOC content of each solvent used for clean-up and surface preparation shall be kept. The list shall be made available to the District upon request. [District Rules 2520, 9.3.2 and 4604, 6.1, 6.2] 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. Daily records of the following shall be kept: (a) The specific coatings used and the mix ratio of the components added to the coatings prior to application; (b) The volume of each coating used in gallons; (c) The specific solvent used for clean-up and surface preparation; (d) The volume of each solvent used; (e) The VOC emissions due to coating and solvent usage from this permit unit; (f) The combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, and N-2253-21; (g) The operating temperature of the thermal oxidizer. [District Rules 1070, 2520, 9.3.2 and 4604, 6.1, 6.2 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
26. Records of the date, the time period and the reason that the thermal oxidizer is out of service shall be kept. [District NSR Rule, Rules 2520, 9.3.2, 4604, 5.2.2, 6.3 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
27. Records of the combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, and N-2253-21 shall be kept for any consecutive 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
28. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 4604] Federally Enforceable Through Title V Permit
29. 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) 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 allowed in District Rule 4604, Section 3.0 (1/15/04). 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, 6.7.1.1] Federally Enforceable Through Title V Permit
30. 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 allowed in District Rule 4604, Section 3.0 (1/15/04). 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, 6.7.1.2] Federally Enforceable Through Title V Permit
31. The capture efficiency shall be tested every five years. The capture efficiency of each collection device shall be determined according to the EPA's document "Guidelines for Determining Capture Efficiency," dated January 9, 1995. An equivalent alternate test method that has been approved by EPA, ARB and the APCO may be used. [District Rule 2520, 9.3.2, and District Rule 4604, 6.7.2.1] Federally Enforceable Through Title V Permit
32. Source testing to demonstrate compliance with the VOC destruction efficiency of the thermal oxidizer shall be conducted on an annual basis. [District Rule 2201] Federally Enforceable Through Title V Permit
33. Source testing to determine the destruction efficiency of the thermal oxidizer shall be conducted using EPA Methods 2, 2A, or 2D for measuring flow rates and EPA Methods 25, 25A, or 25C for measuring total gaseous organic concentrations at the inlet and outlet of the control device. [District Rule 4604, 6.7.2.2] Federally Enforceable Through Title V Permit
34. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
35. 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

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

# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-2253-8-6

EXPIRATION DATE: 10/31/2008

## EQUIPMENT DESCRIPTION:

SIDE SEAM STRIPE SPRAY OPERATION (LINE #8) SERVED BY ONE SOUDRONIC MODEL FBB BODYMAKER AND ONE 0.4 MMBTU/HR SARDEE SLIX-3 CURING TUNNEL. THE FUME HOOD (OVER THE COATING APPLICATOR AND CONVEYOR) AND CURING TUNNEL IS VENTED TO THE SHARED THERMAL OXIDIZER

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] 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. The VOC contaminated air stream from the side seam stripe coater, conveyor between the coater and curing tunnel, and curing tunnel shall be vented to the thermal oxidizer at all times except when the thermal oxidizer is undergoing maintenance. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The collection system for fugitive VOC emissions from the side seam stripe coater, conveyor between the coater and curing tunnel, and curing tunnel shall have a minimum overall capture efficiency of 71%. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The thermal oxidizer shall be maintained at a minimum temperature of 1,490 Degrees F to provide at least 98.5% VOC control. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The thermal oxidizer shall be equipped with a continuous temperature monitoring and recording device. [District NSR Rule, Rules 2520, 9.3.2, 4604, 6.3 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
7. The overall VOC capture and control efficiency shall be calculated by multiplying the percent VOC capture efficiency of the collection system by the percent VOC control efficiency of the thermal oxidizer and divide by 100. [District NSR Rule and Rule 4604, 6.7.2.3] Federally Enforceable Through Title V Permit
8. Three-piece can side seam spray operations shall not use or apply any coating with a VOC content in excess of 660 grams of VOC per liter of coating, as applied, excluding water and exempt compounds. [District Rule 4604, 5.1] Federally Enforceable Through Title V Permit
9. VOC content of solvents used shall not exceed any of the following limits: product cleaning during manufacturing process or surface preparation for coating application: 50 g/l (0.42 lb/gal), repair and maintenance cleaning: 50 g/l (0.42 lb/gal), and cleaning of coating application equipment: 550 g/l (4.6 lb/gal). [District Rule 4604, 5.4.3] 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. Cleaning activities that use solvents with a VOC content greater than 50 g/l (0.42 lb/gallon) shall be performed by one or more of the following methods: wipe cleaning; application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force; 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 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. [District Rule 4604, 5.4.5] Federally Enforceable Through Title V Permit
11. 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 5.4.5.2 of Rule 4604. [District Rule 4604, 5.4.6] Federally Enforceable Through Title V Permit
12. Permittee shall not use VOC-containing materials 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, 5.4.7] Federally Enforceable Through Title V Permit
13. 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, 5.4.9] Federally Enforceable Through Title V Permit
14. Coating transfer efficiency shall be at least 65% as measured using a test method pursuant to Section 6.7.5 of Rule 4604. [District Rule 4604, 5.5.3 & 5.5.4] Federally Enforceable Through Title V Permit
15. The VOC emissions due to coating and solvent usage (from this permit unit) shall not exceed 250 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
16. The PM10 emissions due to coating and solvent usage (from this permit unit) shall not exceed 0.4 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
17. The combined daily VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, and N-2253-21, shall not exceed 250 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
18. The combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, and N-2253-21, shall not exceed 58,579 pounds during any consecutive 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
19. The NO<sub>x</sub> emission concentration from the thermal oxidizer shall not exceed 0.098 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
20. The CO emission concentration from the thermal oxidizer shall not exceed 0.082 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
21. The VOC emission concentration from the thermal oxidizer shall not exceed 0.005 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
22. The SO<sub>x</sub> emission concentration from the thermal oxidizer shall not exceed 0.00285 lb/MMBtu of natural gas consumption. [District NSR Rule and Rule 4801, 3.1]
23. The PM10 emission concentration from the thermal oxidizer shall not exceed 0.0076 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
24. A list of the coatings, catalysts and reducers used, the mix ratio of the components used, the VOC content of each coating used (as applied) and of the VOC content of each solvent used for clean-up and surface preparation shall be kept. The list shall be made available to the District upon request. [District Rules 2520, 9.3.2 and 4604, 6.1, 6.2] 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. Daily records of the following shall be kept: (a) The specific coatings used and the mix ratio of the components added to the coatings prior to application; (b) The volume of each coating used in gallons; (c) The specific solvent used for clean-up and surface preparation; (d) The volume of each solvent used; (e) The VOC emissions due to coating and solvent usage from this permit unit; (f) The combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, and N-2253-21; (g) The operating temperature of the thermal oxidizer. [District Rules 1070, 2520, 9.3.2 and 4604, 6.1, 6.2 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
26. Records of the date, the time period and the reason that the thermal oxidizer is out of service shall be kept. [District NSR Rule, Rules 2520, 9.3.2, 4604, 5.2.2, 6.3 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
27. Records of the combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, and N-2253-21 shall be kept for any consecutive 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
28. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 4604] Federally Enforceable Through Title V Permit
29. 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) 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 allowed in District Rule 4604, Section 3.0 (1/15/04). 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, 6.7.1.1] Federally Enforceable Through Title V Permit
30. 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 allowed in District Rule 4604, Section 3.0 (1/15/04). 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, 6.7.1.2] Federally Enforceable Through Title V Permit
31. The capture efficiency shall be tested every five years. The capture efficiency of each collection device shall be determined according to the EPA's document "Guidelines for Determining Capture Efficiency," dated January 9, 1995. An equivalent alternate test method that has been approved by EPA, ARB and the APCO may be used. [District Rule 2520, 9.3.2, and District Rule 4604, 6.7.2.1] Federally Enforceable Through Title V Permit
32. Source testing to demonstrate compliance with the VOC destruction efficiency of the thermal oxidizer shall be conducted on an annual basis. [District Rule 2201] Federally Enforceable Through Title V Permit
33. Source testing to determine the destruction efficiency of the thermal oxidizer shall be conducted using EPA Methods 2, 2A, or 2D for measuring flow rates and EPA Methods 25, 25A, or 25C for measuring total gaseous organic concentrations at the inlet and outlet of the control device. [District Rule 4604, 6.7.2.2] Federally Enforceable Through Title V Permit
34. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
35. 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

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-2253-9-6

**EXPIRATION DATE:** 10/31/2008

**EQUIPMENT DESCRIPTION:**

SIDE SEAM STRIPE SPRAY OPERATION (LINE #9) SERVED BY ONE SOUDRONIC MODEL FBB BODYMAKER AND ONE 0.4 MMBTU/HR SARDEE SLIX-3 CURING TUNNEL. THE FUME HOOD (OVER THE COATING APPLICATOR AND CONVEYOR) AND CURING TUNNEL IS VENTED TO THE SHARED THERMAL OXIDIZER

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] 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. The VOC contaminated air stream from the side seam stripe coater, conveyor between the coater and curing tunnel, and curing tunnel shall be vented to the thermal oxidizer at all times except when the thermal oxidizer is undergoing maintenance. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The collection system for fugitive VOC emissions from the side seam stripe coater, conveyor between the coater and curing tunnel, and curing tunnel shall have a minimum overall capture efficiency of 71%. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The thermal oxidizer shall be maintained at a minimum temperature of 1,490 Degrees F to provide at least 98.5% VOC control. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The thermal oxidizer shall be equipped with a continuous temperature monitoring and recording device. [District NSR Rule, Rules 2520, 9.3.2, 4604, 6.3 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
7. The overall VOC capture and control efficiency shall be calculated by multiplying the percent VOC capture efficiency of the collection system by the percent VOC control efficiency of the thermal oxidizer and divide by 100. [District NSR Rule and Rule 4604, 6.7.2.3] Federally Enforceable Through Title V Permit
8. Three-piece can side seam spray operations shall not use or apply any coating with a VOC content in excess of 660 grams of VOC per liter of coating, as applied, excluding water and exempt compounds. [District Rule 4604, 5.1] Federally Enforceable Through Title V Permit
9. VOC content of solvents used shall not exceed any of the following limits: product cleaning during manufacturing process or surface preparation for coating application: 50 g/l (0.42 lb/gal), repair and maintenance cleaning: 50 g/l (0.42 lb/gal), and cleaning of coating application equipment: 550 g/l (4.6 lb/gal). [District Rule 4604, 5.4.3] 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. Cleaning activities that use solvents with a VOC content greater than 50 g/l (0.42 lb/gallon) shall be performed by one or more of the following methods: wipe cleaning; application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force; 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 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. [District Rule 4604, 5.4.5] Federally Enforceable Through Title V Permit
11. 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 5.4.5.2 of Rule 4604. [District Rule 4604, 5.4.6] Federally Enforceable Through Title V Permit
12. Permittee shall not use VOC-containing materials 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, 5.4.7] Federally Enforceable Through Title V Permit
13. 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, 5.4.9] Federally Enforceable Through Title V Permit
14. Coating transfer efficiency shall be at least 65% as measured using a test method pursuant to Section 6.7.5 of Rule 4604. [District Rule 4604, 5.5.3 & 5.5.4] Federally Enforceable Through Title V Permit
15. The VOC emissions due to coating and solvent usage (from this permit unit) shall not exceed 250 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
16. The PM10 emissions due to coating and solvent usage (from this permit unit) shall not exceed 0.4 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
17. The combined daily VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, and N-2253-21, shall not exceed 250 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
18. The combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, and N-2253-21, shall not exceed 58,579 pounds during any consecutive 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
19. The NOx emission concentration from the thermal oxidizer shall not exceed 0.098 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
20. The CO emission concentration from the thermal oxidizer shall not exceed 0.082 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
21. The VOC emission concentration from the thermal oxidizer shall not exceed 0.005 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
22. The SOx emission concentration from the thermal oxidizer shall not exceed 0.00285 lb/MMBtu of natural gas consumption. [District NSR Rule and Rule 4801, 3.1]
23. The PM10 emission concentration from the thermal oxidizer shall not exceed 0.0076 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
24. A list of the coatings, catalysts and reducers used, the mix ratio of the components used, the VOC content of each coating used (as applied) and of the VOC content of each solvent used for clean-up and surface preparation shall be kept. The list shall be made available to the District upon request. [District Rules 2520, 9.3.2 and 4604, 6.1, 6.2] 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. Daily records of the following shall be kept: (a) The specific coatings used and the mix ratio of the components added to the coatings prior to application; (b) The volume of each coating used in gallons; (c) The specific solvent used for clean-up and surface preparation; (d) The volume of each solvent used; (e) The VOC emissions due to coating and solvent usage from this permit unit; (f) The combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, and N-2253-21; (g) The operating temperature of the thermal oxidizer. [District Rules 1070, 2520, 9.3.2 and 4604, 6.1, 6.2 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
26. Records of the date, the time period and the reason that the thermal oxidizer is out of service shall be kept. [District NSR Rule, Rules 2520, 9.3.2, 4604, 5.2.2, 6.3 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
27. Records of the combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, and N-2253-21 shall be kept for any consecutive 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
28. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 4604] Federally Enforceable Through Title V Permit
29. 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) 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 allowed in District Rule 4604, Section 3.0 (1/15/04). 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, 6.7.1.1] Federally Enforceable Through Title V Permit
30. 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 allowed in District Rule 4604, Section 3.0 (1/15/04). 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, 6.7.1.2] Federally Enforceable Through Title V Permit
31. The capture efficiency shall be tested every five years. The capture efficiency of each collection device shall be determined according to the EPA's document "Guidelines for Determining Capture Efficiency," dated January 9, 1995. An equivalent alternate test method that has been approved by EPA, ARB and the APCO may be used. [District Rule 2520, 9.3.2, and District Rule 4604, 6.7.2.1] Federally Enforceable Through Title V Permit
32. Source testing to demonstrate compliance with the VOC destruction efficiency of the thermal oxidizer shall be conducted on an annual basis. [District Rule 2201] Federally Enforceable Through Title V Permit
33. Source testing to determine the destruction efficiency of the thermal oxidizer shall be conducted using EPA Methods 2, 2A, or 2D for measuring flow rates and EPA Methods 25, 25A, or 25C for measuring total gaseous organic concentrations at the inlet and outlet of the control device. [District Rule 4604, 6.7.2.2] Federally Enforceable Through Title V Permit
34. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
35. 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

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

# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-2253-15-7

EXPIRATION DATE: 10/31/2008

## EQUIPMENT DESCRIPTION:

SHEET COATING OPERATION #2 CONSISTING OF A WAGNER MODEL 15X44-A SHEET COATER AND A SHARED 8.6 MMBTU/HR YOUNG BROS. KELGRAF OVEN WITH MAXON CYCLOMAX LOW NOX BURNERS. THE COATING APPLICATION EQUIPMENT AND THE OVEN ARE ALL VENTED TO THE SHARED THERMAL OXIDIZER

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] 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 NSR Rule] Federally Enforceable Through Title V Permit
3. The VOC contaminated air stream from the coating application operation and the curing oven shall be vented to the thermal oxidizer prior to discharge into the atmosphere at all times. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The thermal oxidizer shall be maintained at a minimum temperature of 1,490 Degrees F to provide at least 98.5% VOC capture and control. [District NSR Rule, Rules 2520, 9.3.2, 4604, 5.2.2, 6.3 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
5. The thermal oxidizer shall be equipped with an operational continuous temperature monitoring and recording device. [District NSR Rule, Rules 2520, 9.3.2, 4604, 6.3 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
6. VOC content of solvents used shall not exceed any of the following limits: product cleaning during manufacturing process or surface preparation for coating application: 50 g/l (0.42 lb/gal) and repair/maintenance cleaning: 50 g/l (0.42 lb/gal). [District Rule 4604, 5.4.3 & 5.4.10] Federally Enforceable Through Title V Permit
7. Cleaning activities that use solvents with a VOC content greater than 50 g/l (0.42 lb/gallon) shall be performed by one or more of the following methods: wipe cleaning; application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force; 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 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. [District Rule 4604, 5.4.5] Federally Enforceable Through Title V Permit
8. 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 5.4.5.2 of Rule 4604. [District Rule 4604, 5.4.6] Federally Enforceable Through Title V Permit
9. Permittee shall not use VOC-containing materials 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, 5.4.7] 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. 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, 5.4.9] Federally Enforceable Through Title V Permit
11. The VOC emissions due to coating and solvent use shall not exceed 36.7 pounds during any one day. [District NSR Rule and 40 CFR Part 64] Federally Enforceable Through Title V Permit
12. The combined VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18, shall not exceed 10,366 pounds during the first calendar quarter, 9,941 pounds during the second calendar quarter, 10,187 pounds during the third calendar quarter and 10,027 pounds during the fourth calendar quarter. The first and fourth calendar quarter VOC emissions may be increased by the amount of second and third calendar quarter VOC's not emitted. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The combined VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18, shall not exceed 40,521 pounds during any consecutive 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The NOx emission concentration from the curing oven shall not exceed 0.024 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
15. The CO emission concentration from the curing oven shall not exceed 0.15 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
16. The VOC emission concentration from the curing oven, due to the the burning of natural gas, shall not exceed 0.005 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
17. The SOx emission concentration from the curing oven shall not exceed 0.00285 lb/MMBtu of natural gas consumption. [District NSR Rule and Rule 4801, 3.1]
18. The PM10 emission concentration from the curing oven shall not exceed 0.0076 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
19. The NOx emission concentration from the thermal oxidizer shall not exceed 0.098 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
20. The CO emission concentration from the thermal oxidizer shall not exceed 0.082 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
21. The VOC emission concentration from the thermal oxidizer shall not exceed 0.005 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
22. The SOx emission concentration from the thermal oxidizer shall not exceed 0.00285 lb/MMBtu of natural gas consumption. [District NSR Rule and Rule 4801, 3.1]
23. The PM10 emission concentration from the thermal oxidizer shall not exceed 0.0076 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
24. A list of the coatings, catalysts and reducers used, the mix ratio of the components used, the VOC content of each coating used (as applied) and of the VOC content of each solvent used for clean-up and surface preparation shall be kept. The list shall be made available to the District upon request. [District Rules 2520, 9.3.2 and 4604, 6.1, 6.2] Federally Enforceable Through Title V Permit
25. Daily records of the following shall be kept: (a) The specific coatings used and the mix ratio of the components added to the coatings prior to application; (b) The volume of each coating used in gallons; (c) The specific solvent used for clean-up and surface preparation; (d) The volume of each solvent used; (e) The VOC emissions due to coating and solvent usage from this permit unit; (f) The operating temperature of the thermal oxidizer. [District Rules 1070, 2520, 9.3.2 and 4604, 6.1, 6.2 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
26. Records of the combined quarterly VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18 (including the VOC's due to combustion), shall be kept. The records shall be updated at least weekly. [District Rules 1070 and 2520, 9.3.2] 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.

27. Records of the combined VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18 (including the VOC's due to combustion), shall be kept for consecutive 12-month period. [District NSR Rule] Federally Enforceable Through Title V Permit
28. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 4604] Federally Enforceable Through Title V Permit
29. 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) 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 allowed in District Rule 4604, Section 3.0 (1/15/04). 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, 6.7.1.1] Federally Enforceable Through Title V Permit
30. 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 allowed in District Rule 4604, Section 3.0 (1/15/04). 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, 6.7.1.2] Federally Enforceable Through Title V Permit
31. Source testing to determine the VOC destruction efficiency of the thermal oxidizer shall be conducted annually. [District Rules 1081, 2520, 9.3.2, 4604, 6.3 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
32. Source testing to determine the destruction efficiency of the thermal oxidizer shall be conducted using EPA Methods 2, 2A, or 2D for measuring flow rates and EPA Methods 25, 25A, or 25C for measuring total gaseous organic concentrations at the inlet and outlet of the control device. [District Rule 4604, 6.7.2.2] Federally Enforceable Through Title V Permit
33. 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
34. 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

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-2253-16-7

**EXPIRATION DATE:** 10/31/2008

**EQUIPMENT DESCRIPTION:**

SHEET COATING OPERATION #3 CONSISTING OF A WAGNER MODEL 15X44-A SHEET COATER AND A SHARED 8.6 MMBTU/HR YOUNG BROS. KELGRAF OVEN WITH MAXON CYCLOMAX LOW NOX BURNERS. THE COATING APPLICATION EQUIPMENT AND THE OVEN ARE ALL VENTED TO THE SHARED THERMAL OXIDIZER

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] 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 NSR Rule] Federally Enforceable Through Title V Permit
3. The VOC contaminated air stream from the coating application operation and the curing oven shall be vented to the thermal oxidizer prior to discharge into the atmosphere at all times. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The thermal oxidizer shall be maintained at a minimum temperature of 1,490 Degrees F to provide at least 98.5% VOC capture and control. [District NSR Rule, Rules 2520, 9.3.2, 4604, 5.2.2, 6.3 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
5. The thermal oxidizer shall be equipped with an operational continuous temperature monitoring and recording device. [District NSR Rule, Rules 2520, 9.3.2, 4604, 6.3 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
6. VOC content of solvents used shall not exceed any of the following limits: product cleaning during manufacturing process or surface preparation for coating application: 50 g/l (0.42 lb/gal) and repair/maintenance cleaning: 50 g/l (0.42 lb/gal). [District Rule 4604, 5.4.3 & 5.4.10] Federally Enforceable Through Title V Permit
7. Cleaning activities that use solvents with a VOC content greater than 50 g/l (0.42 lb/gallon) shall be performed by one or more of the following methods: wipe cleaning; application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force; 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 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. [District Rule 4604, 5.4.5] Federally Enforceable Through Title V Permit
8. 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 5.4.5.2 of Rule 4604. [District Rule 4604, 5.4.6] Federally Enforceable Through Title V Permit
9. Permittee shall not use VOC-containing materials 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, 5.4.7] 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. 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, 5.4.9] Federally Enforceable Through Title V Permit
11. The VOC emissions due to coating and solvent use shall not exceed 36.7 pounds during any one day. [District NSR Rule and 40 CFR Part 64] Federally Enforceable Through Title V Permit
12. The combined VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18, shall not exceed 10,366 pounds during the first calendar quarter, 9,941 pounds during the second calendar quarter, 10,187 pounds during the third calendar quarter and 10,027 pounds during the fourth calendar quarter. The first and fourth calendar quarter VOC emissions may be increased by the amount of second and third calendar quarter VOC's not emitted. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The combined VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18, shall not exceed 40,521 pounds during any consecutive 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The NOx emission concentration from the curing oven shall not exceed 0.024 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
15. The CO emission concentration from the curing oven shall not exceed 0.15 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
16. The VOC emission concentration from the curing oven, due to the the burning of natural gas, shall not exceed 0.005 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
17. The SOx emission concentration from the curing oven shall not exceed 0.00285 lb/MMBtu of natural gas consumption. [District NSR Rule and Rule 4801, 3.1]
18. The PM10 emission concentration from the curing oven shall not exceed 0.0076 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
19. The NOx emission concentration from the thermal oxidizer shall not exceed 0.098 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
20. The CO emission concentration from the thermal oxidizer shall not exceed 0.082 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
21. The VOC emission concentration from the thermal oxidizer shall not exceed 0.005 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
22. The SOx emission concentration from the thermal oxidizer shall not exceed 0.00285 lb/MMBtu of natural gas consumption. [District NSR Rule and Rule 4801, 3.1]
23. The PM10 emission concentration from the thermal oxidizer shall not exceed 0.0076 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
24. A list of the coatings, catalysts and reducers used, the mix ratio of the components used, the VOC content of each coating used (as applied) and of the VOC content of each solvent used for clean-up and surface preparation shall be kept. The list shall be made available to the District upon request. [District Rules 2520, 9.3.2 and 4604, 6.1, 6.2] Federally Enforceable Through Title V Permit
25. Daily records of the following shall be kept: (a) The specific coatings used and the mix ratio of the components added to the coatings prior to application; (b) The volume of each coating used in gallons; (c) The specific solvent used for clean-up and surface preparation; (d) The volume of each solvent used; (e) The VOC emissions due to coating and solvent usage from this permit unit; (f). The operating temperature of the thermal oxidizer. [District Rules 1070, 2520, 9.3.2 and 4604, 6.1, 6.2 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
26. Records of the combined quarterly VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18 (including the VOC's due to combustion), shall be kept. The records shall be updated at least weekly. [District Rules 1070 and 2520, 9.3.2] 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.

27. Records of the combined VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18 (including the VOC's due to combustion), shall be kept for consecutive 12-month period. [District NSR Rule] Federally Enforceable Through Title V Permit
28. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 4604] Federally Enforceable Through Title V Permit
29. 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) 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 allowed in District Rule 4604, Section 3.0 (1/15/04). 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, 6.7.1.1] Federally Enforceable Through Title V Permit
30. 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 allowed in District Rule 4604, Section 3.0 (1/15/04). 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, 6.7.1.2] Federally Enforceable Through Title V Permit
31. Source testing to determine the VOC destruction efficiency of the thermal oxidizer shall be conducted annually. [District Rules 1081, 2520, 9.3.2, 4604, 6.3 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
32. Source testing to determine the destruction efficiency of the thermal oxidizer shall be conducted using EPA Methods 2, 2A, or 2D for measuring flow rates and EPA Methods 25, 25A, or 25C for measuring total gaseous organic concentrations at the inlet and outlet of the control device. [District Rule 4604, 6.7.2.2] Federally Enforceable Through Title V Permit
33. 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
34. 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

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-2253-17-7

**EXPIRATION DATE:** 10/31/2008

**EQUIPMENT DESCRIPTION:**

SHEET COATING OPERATION #4 CONSISTING OF A WAGNER MODEL 15X44-A SHEET COATER AND A SHARED 8.6 MMBTU/HR YOUNG BROS. KELGRAF OVEN WITH MAXON CYCLOMAX LOW NOX BURNERS. THE COATING APPLICATION EQUIPMENT AND THE OVEN ARE ALL VENTED TO THE SHARED THERMAL OXIDIZER

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] 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 NSR Rule] Federally Enforceable Through Title V Permit
3. The VOC contaminated air stream from the coating application operation and the curing oven shall be vented to the thermal oxidizer prior to discharge into the atmosphere at all times. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The thermal oxidizer shall be maintained at a minimum temperature of 1,490 Degrees F to provide at least 98.5% VOC capture and control. [District NSR Rule, Rules 2520, 9.3.2, 4604, 5.2.2, 6.3 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
5. The thermal oxidizer shall be equipped with an operational continuous temperature monitoring and recording device. [District NSR Rule, Rules 2520, 9.3.2, 4604, 6.3 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
6. VOC content of solvents used shall not exceed any of the following limits: product cleaning during manufacturing process or surface preparation for coating application: 50 g/l (0.42 lb/gal) and repair/maintenance cleaning: 50 g/l (0.42 lb/gal). [District Rule 4604, 5.4.3 & 5.4.10] Federally Enforceable Through Title V Permit
7. Cleaning activities that use solvents with a VOC content greater than 50 g/l (0.42 lb/gallon) shall be performed by one or more of the following methods: wipe cleaning; application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force; 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 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. [District Rule 4604, 5.4.5] Federally Enforceable Through Title V Permit
8. 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 5.4.5.2 of Rule 4604. [District Rule 4604, 5.4.6] Federally Enforceable Through Title V Permit
9. Permittee shall not use VOC-containing materials 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, 5.4.7] 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. 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, 5.4.9] Federally Enforceable Through Title V Permit
11. The VOC emissions due to coating and solvent use shall not exceed 36.7 pounds during any one day. [District NSR Rule and 40 CFR Part 64] Federally Enforceable Through Title V Permit
12. The combined VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18, shall not exceed 10,366 pounds during the first calendar quarter, 9,941 pounds during the second calendar quarter, 10,187 pounds during the third calendar quarter and 10,027 pounds during the fourth calendar quarter. The first and fourth calendar quarter VOC emissions may be increased by the amount of second and third calendar quarter VOC's not emitted. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The combined VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18, shall not exceed 40,521 pounds during any consecutive 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The NOx emission concentration from the curing oven shall not exceed 0.024 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
15. The CO emission concentration from the curing oven shall not exceed 0.15 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
16. The VOC emission concentration from the curing oven, due to the the burning of natural gas, shall not exceed 0.005 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
17. The SOx emission concentration from the curing oven shall not exceed 0.00285 lb/MMBtu of natural gas consumption. [District NSR Rule and Rule 4801, 3.1]
18. The PM10 emission concentration from the curing oven shall not exceed 0.0076 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
19. The NOx emission concentration from the thermal oxidizer shall not exceed 0.098 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
20. The CO emission concentration from the thermal oxidizer shall not exceed 0.082 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
21. The VOC emission concentration from the thermal oxidizer shall not exceed 0.005 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
22. The SOx emission concentration from the thermal oxidizer shall not exceed 0.00285 lb/MMBtu of natural gas consumption. [District NSR Rule and Rule 4801, 3.1]
23. The PM10 emission concentration from the thermal oxidizer shall not exceed 0.0076 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
24. A list of the coatings, catalysts and reducers used, the mix ratio of the components used, the VOC content of each coating used (as applied) and of the VOC content of each solvent used for clean-up and surface preparation shall be kept. The list shall be made available to the District upon request. [District Rules 2520, 9.3.2 and 4604, 6.1, 6.2] Federally Enforceable Through Title V Permit
25. Daily records of the following shall be kept: (a) The specific coatings used and the mix ratio of the components added to the coatings prior to application; (b) The volume of each coating used in gallons; (c) The specific solvent used for clean-up and surface preparation; (d) The volume of each solvent used; (e) The VOC emissions due to coating and solvent usage from this permit unit; (f). The operating temperature of the thermal oxidizer. [District Rules 1070, 2520, 9.3.2 and 4604, 6.1, 6.2 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
26. Records of the combined quarterly VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18 (including the VOC's due to combustion), shall be kept. The records shall be updated at least weekly. [District Rules 1070 and 2520, 9.3.2] 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.

27. Records of the combined VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18 (including the VOC's due to combustion), shall be kept for consecutive 12-month period. [District NSR Rule] Federally Enforceable Through Title V Permit
28. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 4604] Federally Enforceable Through Title V Permit
29. 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) 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 allowed in District Rule 4604, Section 3.0 (1/15/04). 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, 6.7.1.1] Federally Enforceable Through Title V Permit
30. 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 allowed in District Rule 4604, Section 3.0 (1/15/04). 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, 6.7.1.2] Federally Enforceable Through Title V Permit
31. Source testing to determine the VOC destruction efficiency of the thermal oxidizer shall be conducted annually. [District Rules 1081, 2520, 9.3.2, 4604, 6.3 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
32. Source testing to determine the destruction efficiency of the thermal oxidizer shall be conducted using EPA Method 2, 2A, or 2D for measuring flow rates and EPA Methods 25, 25A, or 25C for measuring total gaseous organic concentrations at the inlet and outlet of the control device. [District Rule 4604, 6.7.2.2] Federally Enforceable Through Title V Permit
33. 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
34. 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

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-2253-18-7

**EXPIRATION DATE:** 10/31/2008

**EQUIPMENT DESCRIPTION:**

UV TYPE SHEET COATING OPERATION #1 CONSISTING OF A CRABTREE MODEL 13X45-F1 SHEET COATER. THE SHARED OVEN FROM PERMIT UNITS N-2253-15, N-2253-16, AND N-2253-17 MAY SERVE THE PRODUCTS MANUFACTURED FROM THIS PERMIT UNIT

## PERMIT UNIT REQUIREMENTS

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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 NSR Rule] Federally Enforceable Through Title V Permit
2. VOC content of solvents used shall not exceed any of the following limits: product cleaning during manufacturing process or surface preparation for coating application: 50 g/l (0.42 lb/gal) and repair/maintenance cleaning: 50 g/l (0.42 lb/gal). [District Rule 4604, 5.4.3 & 5.4.10] Federally Enforceable Through Title V Permit
3. Cleaning activities that use solvents with a VOC content greater than 50 g/l (0.42 lb/gallon) shall be performed by one or more of the following methods: wipe cleaning; application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force; 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 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. [District Rule 4604, 5.4.5] 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 section 5.4.5.2 of Rule 4604. [District Rule 4604, 5.4.6] Federally Enforceable Through Title V Permit
5. Permittee shall not use VOC-containing materials 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, 5.4.7] 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, 5.4.9] Federally Enforceable Through Title V Permit
7. The VOC emissions due to coating and solvent use shall not exceed 0.2 pounds during any one day. [District NSR Rule] Federally Enforceable Through Title V Permit
8. The combined VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18, shall not exceed 10,366 pounds during the first calendar quarter, 9,941 pounds during the second calendar quarter, 10,187 pounds during the third calendar quarter, and 10,027 pounds during the fourth calendar quarter. The first and fourth calendar quarter VOC emissions may be increased by the amount of second and third calendar quarter VOC's not emitted. [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.

9. The combined VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18, shall not exceed 40,521 pounds for any consecutive 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
10. A list of the coatings, catalysts and reducers used, the mix ratio of the components used, the VOC content of each coating used (as applied) and of the VOC content of each solvent used for clean-up and surface preparation shall be kept. The list shall be made available to the District upon request. [District Rules 2520, 9.3.2 and 4604, 6.1, 6.2] Federally Enforceable Through Title V Permit
11. Daily records of the following shall be kept: (a) The specific coatings used and the mix ratio of the components added to the coatings prior to application; (b) The volume of each coating used in gallons; (c) The specific solvent used for clean-up and surface preparation; (d) The volume of each solvent used; (e) The VOC emissions due to coating and solvent usage from this permit unit. [District Rules 1070, 2520, 9.3.2 and 4604, 6.1, 6.2] Federally Enforceable Through Title V Permit
12. Records of the combined quarterly VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18 (including the VOC's due to combustion), shall be kept. The records shall be updated at least weekly. [District Rules 1070 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
13. Records of the combined annual VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18 (including the VOC's due to combustion), shall be kept. The records shall be updated at least weekly. [District NSR Rule] Federally Enforceable Through Title V Permit
14. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 4604] Federally Enforceable Through Title V Permit
15. VOC content of coating(s), as applied, and of solvents used for cleanup and surface preparation 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) 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 allowed in District Rule 4604, Section 3.0 (1/15/04). 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, 6.7.1.1] Federally Enforceable Through Title V Permit
16. 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 allowed in District Rule 4604, Section 3.0 (1/15/04). 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, 6.7.1.2] 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-2253-19-3

**EXPIRATION DATE:** 10/31/2008

**EQUIPMENT DESCRIPTION:**

COATING STORAGE TANK #1 CONSISTING OF ONE 8,000 GALLON ABOVEGROUND VERTICAL FIXED ROOF STORAGE TANK

## PERMIT UNIT REQUIREMENTS

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1. This tank shall only contain a liquid with a true vapor pressure (TVP) of less than 0.5 psia under all storage conditions. [District Rule 4623, 2.0] Federally Enforceable Through Title V Permit
2. The maximum amount of coatings received into the storage tank shall not exceed 8,000 gallons in any one day and 416,000 gallons in any one calendar year. [District NSR Rule] Federally Enforceable Through Title V Permit
3. The VOC emission rate from the receiving and storage of the coatings shall not exceed 0.6 lb VOC/day and 27 lb VOC/year. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Maintain records that indicate the true vapor pressure (TVP) of the coatings stored, the daily quantity of coatings received into the tank, and the cumulative annual quantity of coatings received into the storage tank. [District NSR Rule, District Rules 2520, 9.3.2 and 4623, 2.0] Federally Enforceable Through Title V Permit
5. All records shall be retained for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rules 1070, 2520, 9.4.2 and 4623, 6.3] 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-2253-20-3

**EXPIRATION DATE:** 10/31/2008

**EQUIPMENT DESCRIPTION:**

COATING STORAGE TANK #2 CONSISTING OF ONE 8,000 GALLON ABOVEGROUND VERTICAL FIXED ROOF STORAGE TANK

## PERMIT UNIT REQUIREMENTS

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1. This tank shall only contain a liquid with a true vapor pressure (TVP) of less than 0.5 psia under all storage conditions. [District Rule 4623, 2.0] Federally Enforceable Through Title V Permit
2. The maximum amount of coatings received into the storage tank shall not exceed 8,000 gallons in any one day and 416,000 gallons in any one calendar year. [District NSR Rule] Federally Enforceable Through Title V Permit
3. The VOC emission rate from the receiving and storage of the coatings shall not exceed 0.6 lb VOC/day and 27 lb VOC/year. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Maintain records that indicate the true vapor pressure (TVP) of the coatings stored, the daily quantity of coatings received into the tank, and the cumulative annual quantity of coatings received into the storage tank. [District NSR Rule, District Rules 2520, 9.3.2 and 4623, 2.0] Federally Enforceable Through Title V Permit
5. All records shall be retained for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rules 1070, 2520, 9.4.2 and 4623, 6.3] Federally Enforceable Through Title V Permit

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# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-2253-21-2

**EXPIRATION DATE:** 10/31/2008

**EQUIPMENT DESCRIPTION:**

SIDE SEAM STRIPE SPRAY OPERATION (LINE #10) SERVED BY ONE SOUDRONIC MODEL AFB 1075 BODYMAKER AND ONE 0.6 MMBTU/HR SOUDRONIC MODEL LSC-12 CURING TUNNEL. THE FUME HOOD (OVER THE COATING APPLICATOR AND CONVEYOR) AND CURING TUNNEL ARE SERVED BY THE SHARED THERMAL OXIDIZER

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] 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. The VOC contaminated air stream from the side seam stripe coater, conveyor between the coater and curing tunnel, and curing tunnel shall be vented to the thermal oxidizer at all times except when the thermal oxidizer is undergoing maintenance. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The collection system for fugitive VOC emissions from the side seam stripe coater, conveyor between the coater and curing tunnel, and curing tunnel shall have a minimum overall capture efficiency of 71%. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The thermal oxidizer shall be maintained at a minimum temperature of 1,490 Degrees F to provide at least 98.5% VOC control. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The thermal oxidizer shall be equipped with a continuous temperature monitoring and recording device. [District NSR Rule, Rules 2520, 9.3.2, 4604, 6.3 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
7. The overall VOC capture and control efficiency shall be calculated by multiplying the percent VOC capture efficiency of the collection system by the percent VOC control efficiency of the thermal oxidizer and divide by 100. [District NSR Rule and Rule 4604, 6.7.2.3] Federally Enforceable Through Title V Permit
8. Three-piece can side seam spray operations shall not use or apply any coating with a VOC content in excess of 660 grams of VOC per liter of coating, as applied, excluding water and exempt compounds. [District Rule 4604, 5.1] Federally Enforceable Through Title V Permit
9. VOC content of solvents used shall not exceed any of the following limits: product cleaning during manufacturing process or surface preparation for coating application: 50 g/l (0.42 lb/gal), repair and maintenance cleaning: 50 g/l (0.42 lb/gal), and cleaning of coating application equipment: 550 g/l (4.6 lb/gal). [District Rule 4604, 5.4.3] 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. Cleaning activities that use solvents with a VOC content greater than 50 g/l (0.42 lb/gallon) shall be performed by one or more of the following methods: wipe cleaning; application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force; 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 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. [District Rule 4604, 5.4.5] Federally Enforceable Through Title V Permit
11. 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 5.4.5.2 of Rule 4604. [District Rule 4604, 5.4.6] Federally Enforceable Through Title V Permit
12. Permittee shall not use VOC-containing materials 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, 5.4.7] Federally Enforceable Through Title V Permit
13. 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, 5.4.9] Federally Enforceable Through Title V Permit
14. Coating transfer efficiency shall be at least 65% as measured using a test method pursuant to Section 6.7.5 of Rule 4604. [District Rule 4604, 5.5.3 & 5.5.4] Federally Enforceable Through Title V Permit
15. The VOC emissions due to coating and solvent usage (from this permit unit) shall not exceed 250 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
16. The PM10 emissions due to coating and solvent usage (from this permit unit) shall not exceed 0.4 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
17. The combined daily VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, and N-2253-21, shall not exceed 250 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
18. The combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, and N-2253-21, shall not exceed 58,579 pounds during any consecutive 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
19. The NOx emission concentration from the thermal oxidizer shall not exceed 0.098 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
20. The CO emission concentration from the thermal oxidizer shall not exceed 0.082 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
21. The VOC emission concentration from the thermal oxidizer shall not exceed 0.005 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
22. The SOx emission concentration from the thermal oxidizer shall not exceed 0.00285 lb/MMBtu of natural gas consumption. [District NSR Rule and Rule 4801, 3.1]
23. The PM10 emission concentration from the thermal oxidizer shall not exceed 0.0076 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
24. A list of the coatings, catalysts and reducers used, the mix ratio of the components used, the VOC content of each coating used (as applied) and of the VOC content of each solvent used for clean-up and surface preparation shall be kept. The list shall be made available to the District upon request. [District Rules 2520, 9.3.2 and 4604, 6.1, 6.2] 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. Daily records of the following shall be kept: (a) The specific coatings used and the mix ratio of the components added to the coatings prior to application; (b) The volume of each coating used in gallons; (c) The specific solvent used for clean-up and surface preparation; (d) The volume of each solvent used; (e) The VOC emissions due to coating and solvent usage from this permit unit; (f) The combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, and N-2253-21; (g) The operating temperature of the thermal oxidizer. [District Rules 1070, 2520, 9.3.2 and 4604, 6.1, 6.2 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
26. Records of the date, the time period and the reason that the thermal oxidizer is out of service shall be kept. [District NSR Rule, Rules 2520, 9.3.2, 4604, 5.2.2, 6.3 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
27. Records of the combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, and N-2253-21 shall be kept for any consecutive 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
28. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 4604] Federally Enforceable Through Title V Permit
29. 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) 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 allowed in District Rule 4604, Section 3.0 (1/15/04). 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, 6.7.1.1] Federally Enforceable Through Title V Permit
30. 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 allowed in District Rule 4604, Section 3.0 (1/15/04). 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, 6.7.1.2] Federally Enforceable Through Title V Permit
31. The capture efficiency shall be tested every five years. The capture efficiency of each collection device shall be determined according to the EPA's document "Guidelines for Determining Capture Efficiency," dated January 9, 1995. An equivalent alternate test method that has been approved by EPA, ARB and the APCO may be used. [District Rule 2520, 9.3.2, and District Rule 4604, 6.7.2.1] Federally Enforceable Through Title V Permit
32. Source testing to demonstrate compliance with the VOC destruction efficiency of the thermal oxidizer shall be conducted on an annual basis. [District Rule 2201] Federally Enforceable Through Title V Permit
33. Source testing to determine the destruction efficiency of the thermal oxidizer shall be conducted using EPA Methods 2, 2A, or 2D for measuring flow rates and EPA Methods 25, 25A, or 25C for measuring total gaseous organic concentrations at the inlet and outlet of the control device. [District Rule 4604, 6.7.2.2] Federally Enforceable Through Title V Permit
34. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
35. 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

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

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# ATTACHMENT C

Authority to Construct (ATC) N-2253-22-0

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## AUTHORITY TO CONSTRUCT

PERMIT NO: N-2253-22-0

ISSUANCE DATE: 03/24/2008

**LEGAL OWNER OR OPERATOR:** BALL METAL FOOD CONTAINER CORP.  
**MAILING ADDRESS:** ATTN. MANAGER PLANT ENGINEERING  
300 W. GREGER STREET  
OAKDALE, CA 95361

**LOCATION:** 300 W GREGER ST  
OAKDALE, CA 95361-8613

**EQUIPMENT DESCRIPTION:**

SIDE SEAM STRIPE SPRAY OPERATION (LINE #5) SERVED BY ONE SOUDRONIC MODEL AFB-860 BODYMAKER AND ONE 0.4 MMBTU/HR SOUDRONIC MODEL USC-15 CURING TUNNEL. A FUME HOOD OVER THE COATING APPLICATOR, CONVEYOR, AND CURING TUNNEL ARE VENTED TO THE SHARED 8.0 MMBTU/HR SMITH THERMAL OXIDIZER

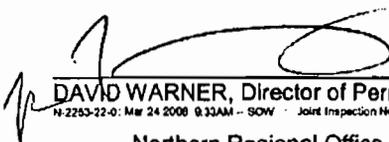
### CONDITIONS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. 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]
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
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. The VOC contaminated air stream from the side seam stripe coater, conveyor between the coater and curing tunnel, and curing tunnel shall be vented to the thermal oxidizer at all time except when the thermal oxidizer is undergoing maintenance. [District Rule 2201]
6. The collection system for fugitive VOC emissions from the side seam stripe coater, conveyor between the coater and curing tunnel, and curing tunnel shall have a minimum overall capture efficiency of 71%. [District Rule 2201]
7. The thermal oxidizer shall be maintained at a minimum temperature of 1,490 Degrees F to provide at least 98.5% VOC control. [District Rule 2201]
8. The thermal oxidizer shall be equipped with a continuous temperature monitoring and recording device. [District Rule 4604]

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-2253-22-0; Mar 24 2008 9:33AM - SOW - Joint Inspection NOT Required

9. The overall VOC capture and control efficiency shall be calculated by multiplying the percent VOC capture efficiency of the collection system by the percent VOC control efficiency of the thermal oxidizer and divide by 100. [District Rule 4604]
10. Three-piece can side seam spray operations shall not use or apply any coating with a VOC content in excess of 660 grams of VOC per liter of coating, as applied, excluding water and exempt compounds. [District Rule 4604]
11. VOC content of solvents used shall not exceed any of the following limits: product cleaning during manufacturing process or surface preparation for coating application: 50 g/l (0.42 lb/gal), repair and maintenance cleaning: 50 g/l (0.42 lb/gal), and cleaning of coating application equipment: 550 g/l (4.6 lb/gal). [District Rule 4604]
12. Cleaning activities that use solvents with a VOC content greater than 50 g/l (0.42 lb/gallon) shall be performed by one or more of the following methods: wipe cleaning; application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force; 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 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. [District Rule 4604]
13. 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 5.4.5.2 of Rule 4604. [District Rule 4604]
14. Permittee shall not use VOC-containing materials 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]
15. 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]
16. Coating transfer efficiency shall be at least 65% as measured using a test method pursuant to Section 6.7.5 of Rule 4604. [District Rule 4604]
17. The VOC emissions due to coating and solvent usage (from this permit unit) shall be less than 100 pounds per any one day. [District Rule 2201]
18. The PM10 emissions due to coating and solvent usage (from this permit unit) shall be less than 0.2 pounds per any one day. [District Rule 2201]
19. The combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, N-2253-21 and N-2253-22, shall not exceed 58,579 pounds during any consecutive 12-month period. [District Rule 2201]
20. The NOX emission concentration from the thermal oxidizer shall not exceed 0.098 lb/MMBtu of natural gas consumption. [District Rule 2201]
21. The SOX emission concentration from the thermal oxidizer shall not exceed 0.00285 lb/MMBtu of natural gas consumption. [District Rule 2201]
22. The PM10 emission concentration from the thermal oxidizer shall not exceed 0.0076 lb/MMBtu of natural gas consumption. [District Rule 2201]
23. The CO emission concentration from the thermal oxidizer shall not exceed 0.084 lb/MMBtu of natural gas consumption. [District Rule 2201]
24. The VOC emission concentration from the thermal oxidizer shall not exceed 0.005 lb/MMBtu of natural gas consumption. [District Rule 2201]

CONDITIONS CONTINUE ON NEXT PAGE

25. 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) 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 allowed in District Rule 4604, Section 3.0 (1/15/04). 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]
26. 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 allowed in District Rule 4604, Section 3.0 (1/15/04). 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]
27. The capture efficiency shall be tested every five years. The capture efficiency of each collection device shall be determined according to the EPA's document "Guidelines for Determining Capture Efficiency," dated January 9, 1995. An equivalent alternate test method that has been approved by EPA, ARB and the APCO may be used. [District Rule 4604]
28. Source testing to demonstrate compliance with the VOC destruction efficiency of the thermal oxidizer shall be conducted on an annual basis. [District Rule 2201]
29. Source testing to determine the destruction efficiency of the thermal oxidizer shall be conducted using EPA Methods 2, 2A, or 2D for measuring flow rates and EPA Methods 25, 25A, or 25C for measuring total gaseous organic concentrations at the inlet and outlet of the control device. [District Rule]
30. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081]
31. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081]
32. A list of the coatings, catalysts and reducers used, the mix ratio of the components used, the VOC content of each coating used (as applied) and of the VOC content of each solvent used for clean-up and surface preparation shall be kept. The list shall be made available to the District upon request. [District Rule 4604]
33. Daily records of the following shall be kept: (a) The specific coatings used and the mix ratio of the components added to the coatings prior to application; (b) The volume of each coating used in gallons; (c) The specific solvent used for clean-up and surface preparation; (d) The volume of each solvent used; (e) The VOC emissions due to coating and solvent usage from this permit unit; (f). The combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, N-2253-21, and N-2253-22 (g). The operating temperature of the thermal oxidizer. [District Rule 2201]
34. Records of the date, the time period and the reason that the thermal oxidizer is out of service shall be kept. [District Rule 4604]
35. Records of the combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, N-2253-21 and N-2253-22 shall be kept for any consecutive 12-month period. [District Rule 2201]
36. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 2201 and 4604]
37. Stationary source (as defined in 40 CFR 63.2 - Definitions) emissions shall be less than 10 tons per year of each single hazardous air pollutant (HAP) (as defined in 40 CFR 63.2 - Definitions) and less than 25 tons per year for any combination of HAPs. A year, for this condition, is any consecutive 12 month period based on a monthly rolling total. [District Rule 2201]

CONDITIONS CONTINUE ON NEXT PAGE

38. The owner/operator shall calculate and maintain records on a monthly basis of the quantity of each HAP emitted into the atmosphere from all sources at the facility. The HAP emissions shall be totaled for a rolling consecutive 12-month period. The records shall include an analysis (or other information) sufficiently detailed to allow the District Personal to make a finding about the source's applicability status with regard to the relevant standard or other requirement. [District Rules 2201 and 2520]
39. 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] Federally Enforceable Through Title V Permit

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# ATTACHMENT D

District Rule 4604 Stringency Analysis Tables

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**Comparison of the latest amended version of District Rule 4604 (amended September 20, 2007) and the current SIP-approved version of District Rule 4604 (amended January 15, 2004)**

<b>Table 1: Comparison of Exemptions for Can and Coil Coating Operations in District Rule 4604 (1/15/04) and District Rule 4604 (9/20/07)</b>		
<b>Exemptions</b>	<b>SIP District Rule 4604 (1/15/04)</b>	<b>District Rule 4604 (9/20/07)</b>
Until January 31, 2005, Section 5.1 through Section 5.2 of this rule shall not apply to stationary sources which use three (3) gallons per day or less of coatings. <u>This exemption will no longer be in effect on and after February 1, 2005.</u>	✓	<b>Obsolete - Removed</b>
On and after February 1, 2005, the provisions of Section 5.1 through Section 5.2 of this rule shall not apply to stationary sources that use 55 gallons or less of the aggregate of coatings (as applied) and cleaning solvent (as applied) per rolling 12-month period.	✓	✓
The lubricants applied by the spray mister to the can end seal compound application nozzle and the lubricants applied to the can body during the can body forming process	✓	✓
The provisions of this rule shall not apply to stripping of cured coatings, cured adhesives, and cured inks, except the stripping of such materials from spray application equipment.	✓	✓
The provisions of this rule shall not apply to stripping of cured coatings, cured adhesives, and cured inks, except the stripping of such materials from spray application equipment.	✓	✓
The cleaning solvent VOC limit provisions of Table 5 shall not apply to the cleaning in laboratory tests and analyses, or bench scale or research and development projects.	✓	✓

<b>Table 2: Comparison of Requirements for Two-Piece Can Coating Operations in District Rule 4604 (1/15/04) and District Rule 4604 (9/20/07)</b>					
5.1 - On any coating line, an operator shall not use or apply any coating with a VOC content in excess of the following limits, expressed as grams of VOC per liter of coating, as applied, excluding water and exempt compounds:				<b>SIP District Rule 4604 (1/15/04)</b>	<b>District Rule 4604 (9/20/07)</b>
Coating Type	Application Method(s)	VOC Content Limits (g/l)		✓	✓
		Effective until January 31, 2006	Effective on and after February 1, 2006		
Interior Sheet Base Coating	Any	225	225	✓	✓
Interior Body Spray	Spray	510	420	✓	✓
Exterior Sheet Base Coating	Any	250	250	✓	✓
Exterior Body Spray	Spray	510	420	✓	✓
Interior Overvarnish	Any	225	225	✓	✓
Exterior Overvarnish	Any	250	250	✓	✓
End Coating (Interior or Exterior)	Spray or roll coat	510	420	✓	✓
End Seal Compound	Any	440	20	✓	✓
Repair Coating	Spray	750	750	✓	✓

**Table 3: Comparison of Requirements for Three-Piece Can Coating Operations in District Rule 4604 (1/15/04) and District Rule 4604 (9/20/07)**

5.1 - On any coating line, an operator shall not use or apply any coating with a VOC content in excess of the following limits, expressed as grams of VOC per liter of coating, as applied, excluding water and exempt compounds:				SIP District Rule 4604 (1/15/04)	District Rule 4604 (9/20/07)
Coating Type	Application Method(s)	VOC Content Limits (g/l)		✓	✓
		Effective until January 31, 2006	Effective on and after February 1, 2006		
Sheet Base Coating (Interior or Exterior)	Any	225	225	✓	✓
Interior Body Spray	Spray	510	360	✓	✓
Exterior Body Spray	Spray	510	420	✓	✓
Overvarnish (Interior or Exterior)	Any	225	225	✓	✓
End Coating (Interior or Exterior)	Spray or roll coat	510	225	✓	✓
Side Seam Coating	Spray	660	660	✓	✓
End Seal Compound	Any	440	20	✓	✓
Repair Coating	Spray	750	750	✓	✓

**Table 4: Comparison of Requirements for Drums, Pails, and Lids Coating Operations in District Rule 4604 (1/15/04) and District Rule 4604 (9/20/07)**

5.1 - On any coating line, an operator shall not use or apply any coating with a VOC content in excess of the following limits, expressed as grams of VOC per liter of coating, as applied, excluding water and exempt compounds:				SIP District Rule 4604 (1/15/04)	District Rule 4604 (9/20/07)
Coating Type	Application Method(s)	VOC Content Limits (g/l)		✓	✓
		Effective until January 31, 2006	Effective on and after February 1, 2006		
Sheet Base Coating (Interior or Exterior)	Any	225	225	✓	✓
Interior Body Spray	Spray			✓	✓
New		510	420	✓	✓
Reconditioned		510	510	✓	✓
Exterior Body Spray	Spray			✓	✓
New		510	340	✓	✓
Reconditioned		510	420	✓	✓
Overvarnish (Interior or Exterior)	Any	225	225	✓	✓
Interior End Coating	Spray or roll coat			✓	✓
New		510	420	✓	✓
Reconditioned		510	510	✓	✓
Exterior End Coating	Spray or roll coat			✓	✓
New		510	340	✓	✓
Reconditioned		510	420	✓	✓
Side Seam Coating	Spray	660	660	✓	✓
End Seal Compound	Any	440	60	✓	✓

<b>Table 5: Comparison of Requirements for Coil Coating Operations in District Rule 4604 (1/15/04) and District Rule 4604 (9/20/07)</b>			
5.1 - On any coating line, an operator shall not use or apply any coating with a VOC content in excess of the following limits, expressed as grams of VOC per liter of coating, as applied, excluding water and exempt compounds:		<b>SIP District Rule 4604 (1/15/04)</b>	<b>District Rule 4604 (9/20/07)</b>
Coating Type	VOC Content Limits (g/l)	✓	✓
Prime and topcoat or single coat operation	220		

<b>Table 6: Comparison of Requirements for Approved VOC Emission Control Systems in District Rule 4604 (1/15/04) and District Rule 4604 (9/20/07)</b>		
<b>Section 5.2 - Approved VOC Emission Control System</b>	<b>SIP District Rule 4604 (1/15/04)</b>	<b>District Rule 4604 (9/20/07)</b>
The use of coatings with VOC contents in excess of the applicable limits specified in Table 1, Table 2, Table 3, or Table 4, provided emissions of VOC to the atmosphere are controlled by an APCO-approved VOC emission control system	✓	✓
The VOC emission control system shall have an overall capture and control efficiency of at least 90 percent by weight	✓	✓
The VOC emission control system shall 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.	✓	✓
The VOC emission control system shall comply with the requirements of Sections 5.2.2 and 5.2.3 during periods of emission-producing activities.	✓	✓
The VOC emission control system used to comply with the provisions of this rule shall be under District permit.	✓	✓
An operator using a VOC emission control system to comply with provisions of this rule shall monitor key system operating parameters.	✓	✓
An operator using a VOC emission control system to comply with the provisions of this rule shall implement an Operation and Maintenance Plan pursuant to Section 6.5 within 10 days of APCO approval of the plan.	✓	✓
An operator shall source test/certify initially a Permanent Total Enclosures (PTE) to demonstrate that the PTE complies with the requirements of a PTE pursuant to Section 6.7.2.	✓	✓
A VOC emission collection device used to comply with this rule that has already been tested or certified as compliant with the requirements of a PTE as of February 1, 2004 does not need to be retested or re-certified to comply with the requirements of Section 5.2.8.1.1, except if the collection device has undergone a change that would affect the collection device's ability to comply with the requirements of a PTE since the initial source test/certification or if a re-test/re-certification is requested by the APCO.	✓	✓
An operator shall source test each non-PTE at least once every twelve (12) months to determine the capture efficiency of the collection device.	✓	✓
A non-PTE shall be source tested under conditions representative of normal operating conditions using non-compliant coating and under conditions specified in the Permit-To-Operate	✓	✓
The source test for a non-PTE shall occur within 24 hours of the source test for the VOC control device to which the non-PTE is connected.	✓	✓
An operator shall source test each VOC emission control device at least once every twelve (12) months to determine the control efficiency of the VOC emission control device.	✓	✓

<b>Table 6: Comparison of Requirements for Approved VOC Emission Control Systems in District Rule 4604 (1/15/04) and District Rule 4604 (9/20/07)</b>		
<b>Section 5.2 - Approved VOC Emission Control System</b>	<b>SIP District Rule 4604 (1/15/04)</b>	<b>District Rule 4604 (9/20/07)</b>
The source test for a VOC emission control device connected shall be conducted under conditions representative of normal operating conditions using non-compliant coating and under conditions specified in the Permit-To-Operate.	✓	✓
A source test of the VOC emission control system 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.	✓	✓
An operator shall demonstrate that the overall capture and control efficiency of the VOC emission control system as calculated using the capture efficiency and control efficiency determined pursuant to Section 5.2.8.1 through Section 5.2.8.3 complies with the requirements of Section 5.2.2 and Section 5.2.3.	✓	✓

<b>Table 7: Comparison of Prohibition of Specification and Sale Requirements in District Rule 4604 (1/15/04) and District Rule 4604 (9/20/07)</b>		
<b>Section 5.3 – Prohibition of Specification and Sale</b>	<b>SIP District Rule 4604 (1/15/04)</b>	<b>District Rule 4604 (9/20/07)</b>
The provisions of Section 5.3 shall be in effect on and after February 1, 2005.	✓	<b>Obsolete - Removed</b>
A person shall not solicit or require an operator in the District to use any can and coil coating or combination of can and coil coatings subject to the provisions of this rule that does not meet the limits and requirements of Section 5.1 through Section 5.2 or that causes the operation utilizing the coating or combination of coatings to be out of compliance with this rule.	✓	✓
A person shall not sell or offer for sale for use within the District any coating that contains VOCs in excess of the limits specified in this rule for any application governed by this rule unless the label on the product or the data sheets for the product clearly bear the warning that the coating shall not be used unless compliance with the rule can be achieved, either with compliant coatings or with an approved VOC emission control system.	✓	✓

<b>Table 8: Comparison of VOC Limits for Organic Solvents Used in Cleaning Operations in District Rule 4604 (1/15/04) and District Rule 4604 (9/20/07)</b>				
<b>Section 5.4 – Organic Solvent Cleaning Requirements</b>			<b>SIP District Rule 4604 (1/15/04)</b>	<b>District Rule 4604 (9/20/07)</b>
<b>Type of Solvent Cleaning Operation</b>	<b>Effective November 15, 2002 through November 14, 2003</b>		✓	<b>Obsolete - Removed</b>
	<b>VOC Content Limit Grams of VOC/liter of material (lb/gal)</b>	<b>VOC Composite Partial Pressure Limit, mm Hg at 20°C (68°F)</b>		
A. Product Cleaning During Manufacturing Process or Surface Preparation for Coating Application	70 (0.58)	no limit	✓	<b>Obsolete - Removed</b>
B. Repair and Maintenance Cleaning	50 (0.42)	no limit	✓	<b>Obsolete - Removed</b>

<b>Table 8: Comparison of VOC Limits for Organic Solvents Used in Cleaning Operations in District Rule 4604 (1/15/04) and District Rule 4604 (9/20/07)</b>				
<b>Section 5.4 – Organic Solvent Cleaning Requirements</b>			<b>SIP District Rule 4604 (1/15/04)</b>	<b>District Rule 4604 (9/20/07)</b>
<b>Type of Solvent Cleaning Operation</b>	<b>Effective November 15, 2002 through November 14, 2003</b>		✓	<b>Obsolete - Removed</b>
	VOC Content Limit Grams of VOC/liter of material (lb/gal)	VOC Composite Partial Pressure Limit, mm Hg at 20°C (68°F)		
C. Cleaning of Coating Application Equipment	950 (7.9)	35	✓	<b>Obsolete - Removed</b>
<b>Type of Solvent Cleaning Operation</b>	<b>Effective November 15, 2003</b>		✓	✓
A. Product Cleaning During Manufacturing Process or Surface Preparation for Coating Application	50 (0.42)		✓	✓ Until 9/20/2008
B. Repair and Maintenance Cleaning	50 (0.42)		✓	✓ Until 9/20/2008
C. Cleaning of Coating Application Equipment	550 (4.6)		✓	✓ Until 10/1/2011
<b>Type of Solvent Cleaning Operation</b>	<b>Effective on and after November 15, 2008</b>			✓
A. Product Cleaning During Manufacturing Process or Surface Preparation for Coating Application	25 (0.21)			✓
B. Repair and Maintenance Cleaning	25 (0.21)			✓
C.1 Cleaning of Coating Application Equipment except sheet coater for three-piece can	25 (0.21)			✓
C.2 Cleaning of sheet coater for three-piece can	550 (4.6)			✓
<b>Type of Solvent Cleaning Operation</b>	<b>Effective on and after October 1, 2011</b>			✓
C.2 Cleaning of sheet coater for three-piece can	250 (2.3)			✓

<b>Table 9: Comparison of Organic Solvents Cleaning Requirements in District Rule 4604 (1/15/04) and District Rule 4604 (9/20/07)</b>		
<b>Section 5.4 – Organic Solvent Cleaning Requirements &amp; Section 5.5 – Organic Solvent Storage and Disposal</b>	<b>SIP District Rule 4604 (1/15/04)</b>	<b>District Rule 4604 (9/20/07)</b>
From November 15, 2002, through November 14, 2003, for cleaning operations, a person shall not use organic solvents that exceed the VOC content limits and composite partial pressure limits specified as being "Effective November 15, 2002 through November 14, 2003" in Table 5.	✓	<b>Obsolete - Removed</b>

**Table 9: Comparison of Organic Solvents Cleaning Requirements in District Rule 4604 (1/15/04) and District Rule 4604 (9/20/07)**

Section 5.4 – Organic Solvent Cleaning Requirements & Section 5.5 – Organic Solvent Storage and Disposal	SIP District Rule 4604 (1/15/04)	District Rule 4604 (9/20/07)
On and after November 15, 2003, for cleaning operations, a person shall not use organic solvents that exceed the VOC content limits specified as being "Effective November 15, 2003" in Table 5. On and after November 15, 2003, the composite partial pressure of solvents used for cleaning operations will not be regulated.	✓	✓ Until 9/20/2008
Cleaning activities that use solvents with a VOC Content greater than 50 g/l 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; or 4) Solvent flushing method in which the cleaning solvent is discharged into a container that is closed except for solvent collection openings	✓	✓ Until 9/20/2008
On and after September 21, 2008, except for sheet coating of three-piece cans, an operator shall perform all solvent cleaning operations with cleaning material having VOC content of 25 g/L or less, unless such cleaning operations are carried out within the control of an APCO-approved emission control system		✓
On and after September 21, 2008, cleaning activities for sheet coater of three-piece cans that use solvents with a VOC Content greater than 25 g/l 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; or 4) Solvent flushing method in which the cleaning solvent is discharged into a container that is closed except for solvent collection openings, unless such cleaning operations are carried out within the control of an APCO-approved emission control system		✓
Solvent shall not be atomized into the open air unless it is vented to a VOC emission control system that complies with Section 5.2. 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	✓	✓
An operator shall not use VOC-containing materials to clean spray equipment used for the application of coatings, adhesives, or ink, unless an enclosed system or equipment that is proven to be equally effective at controlling emissions is used for cleaning. If an enclosed system is used, it must totally enclose spray guns, cups, nozzles, bowls, and other parts during washing, rinsing and draining procedures, and it must be used according to the manufacturer's recommendations and must be closed when not in use.	✓	✓
An operator cleaning coating application equipment corresponding to Table 5 - Category C (Cleaning of Coating Application Equipment) that is not spray application equipment may use an alternative cleaning method other than those specified, if the alternative cleaning method is approved by the APCO and EPA.	✓	✓
In lieu of complying with the VOC content limits in Table 5 –Category C (Cleaning of Coating Application Equipment) an operator may control emissions from cleaning operations with an APCO-approved VOC emission control system that meets the requirements of Section 5.2.	✓	✓

**Table 9: Comparison of Organic Solvents Cleaning Requirements in District Rule 4604 (1/15/04) and District Rule 4604 (9/20/07)**

Section 5.4 – Organic Solvent Cleaning Requirements & Section 5.5 – Organic Solvent Storage and Disposal	SIP District Rule 4604 (1/15/04)	District Rule 4604 (9/20/07)
In lieu of complying with the VOC content limits in Table 5 – (VOC Limits for Organic Solvents Used in Cleaning Operations) or the work practices standards for solvent cleaning activities in Section 5.4 an operator may control emissions from cleaning operations with an APCO-approved VOC emission control system that meets the requirements of Section 5.2.*		✓

*\*Although the amended version of Rule 4702 (9/20/07) gives greater flexibility to use a VOC emissions control system rather than low-VOC solvents and solvent handling practices to comply with the rule, this does not represent a relaxation of overall rule. The provisions are already included in the SIP-approved version of the rule for the use of coatings that have higher VOC contents than the solvents. These amendments merely clarify that the same provisions apply to the use of solvents. Additionally, the VOC control system is subject to stringent requirements to ensure that equivalent emission reductions are achieved. Pursuant to district Rule 4604, the VOC emissions control system must have an overall capture and control efficiency of 90%, must be operated during emission producing activities, must be under District permit, and must be monitored and periodically source tested to demonstrate ongoing compliance; additionally, the operator of the VOC emissions control system is required to submit and Operation and Maintenance plan to ensure the control device is working properly. These requirements ensure that equal or greater reductions will be achieved than those that would have been achieved by complying with the solvent VOC content and work practice standards in the rule.*

**Table 10: Comparison of Application Equipment Requirements in District Rule 4604 (1/15/04) and District Rule 4604 (9/20/07)**

Section 5.6 – Application Equipment	SIP District Rule 4604 (1/15/04)	District Rule 4604 (9/20/07)
An operator shall not apply any coating unless: 1)The coating is applied with properly operating coating application equipment, 2) The coating application equipment is operated according to operating procedures specified by the equipment manufacturer, and 3)The coating application equipment complies with the requirements for application equipment in Section 5 listed below	✓	✓
An operator shall not apply any coating except by use of one or more of the following methods: 1) Electrostatic Application, 2) Flow Coater, 3) Roll Coater, 4) Dip Coater, 5) Hand Application Methods, 6) HVLP Spray, 7) 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 Rule 4604	✓	✓
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.	✓	✓
An operator shall not sell or offer for sale for use within the District any HVLP spray gun without a permanent marking denoting the maximum inlet air pressure in psig at which the gun will operate. Limits are between 0.1 psig and 10.0 psig of air atomizing pressure.	✓	✓
In lieu of complying with the requirements for application equipment, an operator may control emissions from application equipment with an APCO-approved VOC emission control system that controls the emissions from the source operation pursuant to the requirements of Section 5.2.	✓	✓

<b>Table 10: Comparison of General Administrative Requirements in District Rule 4604 (1/15/04) and District Rule 4604 (9/20/07)</b>		
<b>Section 6.1 – Administrative Requirements</b>	<b>SIP District Rule 4604 (1/15/04)</b>	<b>District Rule 4604 (9/20/07)</b>
An operator who performs a can coating or coil coating operation subject to any part of Section 5.0 or is exempt from this rule because of being below the applicable coating and cleaning solvent usage thresholds in Section 4.0 or performs solvent cleaning operations associated with Section 5.4 shall comply with the recordkeeping requirements of Section 6.2 through Section 6.5:	✓	✓

<b>Table 11: Comparison of Coatings Record Requirements in District Rule 4604 (1/15/04) and District Rule 4604 (9/20/07)</b>		
<b>Section 6.2 – Coating Records</b>	<b>SIP District Rule 4604 (1/15/04)</b>	<b>District Rule 4604 (9/20/07)</b>
Coatings Materials List – An 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; 3) VOC content of each coating, as applied in g/l or lb/gal; and 4) VOC content of each catalyst and thinner used g/l or lb/gal.	✓	✓
Coatings Usage Records – An operator shall maintain records that include the following information: 1) Specific coating used and mix ratio of components added to the coating material; 2) Volume of coatings applied (gallons); 3) Specific solvents, catalysts and thinners used; and 4) Volume of each solvent, catalyst and thinner (gallons)	✓	✓
An operator shall maintain coatings usage records on a daily basis, except operators that keep records of exemption for low coating usage pursuant to the applicable provisions of Section 6.2	✓	✓
A person claiming exemption pursuant to Section 4.0 for use of no more than three (3) gallons per day of coatings may maintain coatings usage records on an extended basis, not to exceed monthly, provided the records substantiate coatings used are less than three (3) gallons per day for each day of the entire extended period. <u>The provision of this section will no longer apply on and after February 1, 2005.</u>	✓	<b>Obsolete - Removed</b>
An operator claiming exemption pursuant Section 4.0 for use of no more than 55 gallons of coatings and cleaning solvent per rolling 12-month period may maintain coatings usage records on an extended basis not to exceed monthly provided the records substantiate claim of exemption for the entire extended period.	✓	✓
An operator shall retain coatings materials lists and coatings usage records for a minimum of five (5) years and make the records available to the APCO and submit the records to the APCO upon request.	✓	✓
An operator shall retain coatings materials lists and coatings usage records for a minimum of five (5) years and make the records available to ARB or EPA and submit the records to the ARB or EPA upon request.		✓

**Table 12: Comparison of Cleaning Solvent Record Requirements in District Rule 4604 (1/15/04) and District Rule 4604 (9/20/07)**

Section 6.3 – Cleaning Solvent Records	SIP District Rule 4604 (1/15/04)	District Rule 4604 (9/20/07)
Cleaning Solvents Materials List – An 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) The VOC content of the solvent expressed in g/l or lb/gallon, as applied	✓	✓
<u>On and before November 14, 2003</u> , an operator shall maintain and have available on site records of the composite partial pressure of the cleaning solvents in use. The composite partial pressure of the solvent shall be expressed in mm Hg at 20°C (68°F). <u>On and after November 15, 2003, the composite partial pressure of solvents used for cleaning operations will not be regulated</u> , but records from before November 15, 2003 must still be retained for five (5) years from date of record (until November 14, 2008).	✓	<b>Obsolete - Removed</b>
Cleaning Solvent Usage List - An operator shall maintain records that include the following 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 shall be recorded in order to determine compliance with the specified limits of VOC content; 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 5.4of this rule.	✓	✓
Cleaning Solvent Usage List - When the solvent is a mixture of different materials that are blended by the operator, the VOC content of the batch shall be calculated and recorded		✓
When the solvent is a mixture of different materials that are blended by the operator, the mix ratio of the batch would be recorded in order to determine compliance with the specified limits for the VOC composite partial pressure, as applied. <u>On and after November 15, 2003, the composite partial pressure of solvents used for cleaning operations will not be regulated</u> . Records from before November 15, 2003 must still be retained for five (5) years from date of record (until November 14, 2008).  <u>Through November 14, 2003</u> , an operator shall maintain and have available on site records of the composite partial pressure of the blended solvent(s) used expressed in mm Hg at 20°C (68°F). <u>On and after November 15, 2003, the composite partial pressure of solvents used for cleaning operations will not be regulated</u> . Records from before November 15, 2003 must still be retained on-site for five (5) years from date of record (until November 14, 2008).	✓	<b>Obsolete - Removed</b>
An operator shall maintain coatings usage records on a daily basis, except operators that keep records of exemption for low coating usage pursuant to the applicable provisions of Section 6.3	✓	✓
An operator claiming exemption pursuant Section 4.0 for usage of quantities of coatings and cleaning solvents below that applicable exemption threshold may maintain cleaning solvent usage records on an extended basis not to exceed monthly provided the records substantiate claim of exemption for the entire extended period.	✓	✓
An operator shall retain cleaning solvent materials lists and cleaning solvent usage records for a minimum of five (5) years and make the records available to the APCO and submit the records to the APCO upon request.	✓	✓

<b>Table 12: Comparison of Cleaning Solvent Record Requirements in District Rule 4604 (1/15/04) and District Rule 4604 (9/20/07)</b>		
<b>Section 6.3 – Cleaning Solvent Records</b>	<b>SIP District Rule 4604 (1/15/04)</b>	<b>District Rule 4604 (9/20/07)</b>
An operator shall retain cleaning solvent materials lists and cleaning solvent usage records for a minimum of five (5) years and make the records available to ARB or EPA and submit the records to the ARB or EPA upon request.		✓

<b>Table 13: Comparison of VOC Emission Control System Record Requirements in District Rule 4604 (1/15/04) and District Rule 4604 (9/20/07)</b>		
<b>Section 6.4 – VOC Emission Control System Records</b>	<b>SIP District Rule 4604 (1/15/04)</b>	<b>District Rule 4604 (9/20/07)</b>
An operator using a VOC emission control system pursuant to Section 5.2 as a means of complying with this rule shall maintain daily records of key system operating parameters which will demonstrate continuous operation and compliance of the VOC emission control system during periods of emission-producing activities.	✓	✓
Excess Reporting: Any record showing violation of Section 5.2 shall be reported by sending a copy of such record to the APCO within 96 hours following the occurrence. Such report will include an explanation of the cause of the violation and the corrective action taken.	✓	✓
An operator shall retain VOC Emission Control System records for a minimum of five (5) years and make the records available to the APCO and submit the records to the APCO upon request.	✓	✓
An operator shall retain VOC Emission Control System records for a minimum of five (5) years and make the records available to ARB or EPA and submit the records to the ARB or EPA upon request.		✓

<b>Table 14: Comparison of VOC Emission Control System Operation &amp; Maintenance (O/M) Plan in District Rule 4604 (1/15/04) and District Rule 4604 (9/20/07)</b>		
<b>Section 6.5 – VOC Emission Control System Operation and Maintenance (O/M) Plan</b>	<b>SIP District Rule 4604 (1/15/04)</b>	<b>District Rule 4604 (9/20/07)</b>
A VOC emission control system subject to the provisions of Section 5.2 shall submit to the APCO for approval an Operation and Maintenance (O/M) Plan	✓	✓
No provision in the O/M Plan shall conflict with or take precedence over any provision of this rule.	✓	✓

<b>Table 14: Comparison of VOC Emission Control System Operation &amp; Maintenance (O/M) Plan in District Rule 4604 (1/15/04) and District Rule 4604 (9/20/07)</b>		
<b>Section 6.5 – VOC Emission Control System Operation and Maintenance (O/M) Plan</b>	<b>SIP District Rule 4604 (1/15/04)</b>	<b>District Rule 4604 (9/20/07)</b>
The O/M Plan shall specify actions to be taken to satisfy the following requirements and the requirements of Section 5.2. The actions to be identified in the O/M Plan include, but are not limited to: 1) Identification of key system operating parameter(s); 2) Minimum values or range of acceptable values for key system operating parameter(s) that source testing has shown result in VOC emissions within rule limits; 3) Procedures for preventive and corrective maintenance performed; 4) Procedures for collecting and recording required data and other information in a form approved by the APCO including, but not limited to, data collected through the O/M Plan and the monitoring of key system operating parameters; 5) Burner maintenance schedule; 6) Catalyst maintenance and maintenance schedule, where applicable; 7) Duct inspection schedule; 8) Procedures for revising the O/M Plan; 9) All other information necessary to verify compliance with applicable provisions of this rule; and 10) The O/M Plan shall specify which records will be used to document the operation and maintenance procedures.	✓	✓
The O/M Plan shall not be implemented prior to approval in writing by the APCO.	✓	✓
The O/M Plan shall be updated prior to any planned change in operation of the VOC emission control system. 1) An operator may request a change to the O/M Plan at any time. 2) 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. 3) If the O/M Plan undergoes significant changes to one or more O/M Plan elements, an operator must submit an updated O/M Plan to the APCO for approval no later than 14 days after the change.	✓	✓
A person with a VOC emission control system that has an active Permit-To-Operate subject to the provisions of this rule on January 31, 2004 shall submit an Operation and Maintenance Plan for approval by the APCO by <u>August 1, 2004</u> .	✓	<b>Obsolete - Removed</b>
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.	✓	✓
An operator receiving an Authority to Construct for a new or modified VOC emission control system shall submit a new or modified O/M Plan to the APCO prior to implementation of an Authority to Construct for the VOC emission control system.	✓	✓
The APCO shall provide written notice to the facility of the approval or incompleteness of a new or revised O/M Plan within 30 days of receiving such plan.	✓	✓

<b>Table 15: Comparison of Compliance Statement Requirements in District Rule 4604 (1/15/04) and District Rule 4604 (9/20/07)</b>		
<b>Section 6.6 – Compliance Statement Requirements</b>	<b>SIP District Rule 4604 (1/15/04)</b>	<b>District Rule 4604 (9/20/07)</b>
The manufacturer of any coating subject to this rule shall indicate on the coating container, or on a separate product data sheet or material safety data sheet, the name of the coating, manufacturer's name, the VOC content, specific mixing instructions, and density, as supplied. The VOC content shall be expressed in units of g/l or lb/gallon.	✓	✓

**Table 15: Comparison of Compliance Statement Requirements in District Rule 4604 (1/15/04) and District Rule 4604 (9/20/07)**

Section 6.6 – Compliance Statement Requirements	SIP District Rule 4604 (1/15/04)	District Rule 4604 (9/20/07)
The manufacturer of any solvent subject to this rule shall indicate on the solvent container, or on a separate product data sheet or material safety data sheet, the name of the solvent, manufacturer's name, the VOC content, and density. The VOC content shall be expressed in units of g/l or lb/gallon	✓	✓
The manufacturer of any solvent subject to this rule shall indicate on the solvent container, or on a separate product data sheet or material safety data sheet, the VOC composite partial vapor pressure, as defined in the rule, of the solvent, as supplied. The VOC composite vapor pressure shall be expressed in mm Hg at 20°C (68°F). <u>On and after November 15, 2003, the composite partial pressure of solvents used for cleaning operations will not be regulated, so the VOC composite partial vapor pressure need not be recorded after February 1, 2004.</u>	✓	<b>Obsolete - Removed</b>

**Table 16: Comparison of Test Methods in District Rule 4604 (1/15/04) and District Rule 4604 (9/20/07)**

Section 6.7 – Test Methods	SIP District Rule 4604 (1/15/04)	District Rule 4604 (9/20/07)
The VOC content of solvents and organic materials shall be determined by using EPA Method 24 or 24A, 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" in Section 3.0.	✓	✓
The content of exempt halogenated VOCs shall be determined by using ARB Method 432 or SCAQMD Method 303 (Determination of Exempt Compounds).	✓	✓
The capture efficiency of VOC emission control system's collection device(s) 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 APCO.	✓	✓
The control efficiency of a VOC emission control system's control device(s) 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.	✓	✓
For VOC emission control systems that consist of a single VOC emission collection device connected to a single VOC emission control device, the overall capture and control efficiency may/shall* be calculated by using the following equation: $CE_{\text{Capture and Control}} = [CE_{\text{Capture}} \times CE_{\text{Control}}]/100$ Where: $CE_{\text{Capture and Control}}$ = Overall Capture and Control Efficiency, in percent $CE_{\text{Capture}}$ = Capture Efficiency of the collection device, in percent $CE_{\text{Control}}$ = Control Efficiency of the control device, in percent	✓	✓
<i>*Rule 4604 (1/15/04) used the word "may" instead of while Rule 4604 (9/20/07) uses the more stringent "shall"</i>		

<b>Table 16: Comparison of Test Methods in District Rule 4604 (1/15/04) and District Rule 4604 (9/20/07)</b>		
<b>Section 6.7 – Test Methods</b>	<b>SIP District Rule 4604 (1/15/04)</b>	<b>District Rule 4604 (9/20/07)</b>
The composite partial pressure of solvents shall be determined by: 1) Determining the identity and quantity of each compound in a blended organic solvent by using ASTM D2306, or SCAQMD Method 308 or by using ASTM E260 for organics and ASTM D3792 for water content, if applicable, or the manufacturer's product formulation data, and 2) Determining the vapor pressure of each pure VOC component by using ASTM D2879 or from publications; and 3) Calculating the composite partial pressure of the solvent by using the formula for "Composite Partial Pressure" in Section 3.0.	✓	<b>Obsolete – Removed</b> (Limits for solvent vapor pressure no longer applicable)
The passive and active solvent losses from spray gun cleaning systems shall be determined by using SCAQMD "General Test Method for Determining Solvent Losses from Spray Gun Cleaning Systems" dated October 3, 1989. The test solvent for this determination shall be lacquer thinner with a minimum vapor pressure of 105 mm Hg at 20°C. The minimum temperature shall be 15°C.	✓	✓
Transfer efficiency shall be determined by one of the following: 1) SCAQMD Method "Spray Equipment Transfer Efficiency Test Procedure for Equipment User, May 24, 1989, or 2) Can Manufacturers' Institute (CMI) "Test Plan for Measuring Transfer Efficiency of Coating Application on 3-Piece Metal Cans" 1991, or 3) Any other test method for transfer efficiency for which written approval of the EPA, ARB, and the APCO has been obtained.	✓	✓

<b>Table 17: Comparison of How Multiple Test Methods Establish a Violation in District Rule 4604 (1/15/04) and District Rule 4604 (9/20/07)</b>		
<b>Section 6.8 – Multiple Test Methods</b>	<b>SIP District Rule 4604 (1/15/04)</b>	<b>District Rule 4604 (9/20/07)</b>
When more than one test method or set of test methods is specified for any testing, a violation of any requirement of this rule established by any one of the specified test methods or set of test methods shall constitute a violation of this rule.	✓	✓

<b>Table 18: Comparison of Version of Test Methods in District Rule 4604 (1/15/04) and District Rule 4604 (9/20/07)</b>		
<b>Section 6.9 – Version of Test Methods</b>	<b>SIP District Rule 4604 (1/15/04)</b>	<b>District Rule 4604 (9/20/07)</b>
All ASTM test methods referenced in Section 6.0 are the most recently EPA-approved version that appears in the CFR as Materials Approved for Incorporation by Reference.	✓	✓

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# ATTACHMENT E

Detailed Facility List

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**Detailed Facility Report**  
For Facility=2253 and excluding Deleted Permits  
Sorted by Facility Name and Permit Number

<b>BALL METAL FOOD CONTAINER CORP.</b> <b>300 W GREGER ST</b> <b>OAKDALE, CA 95361-8613</b>	<b>FAC #</b> <b>STATUS:</b> <b>TELEPHONE:</b>	<b>N 2253</b> <b>A</b> <b>3034605568</b>	<b>TYPE:</b> <b>TOXIC ID:</b>	<b>TitleV</b> <b>11097</b>	<b>EXPIRE ON:</b> <b>AREA:</b> <b>INSP. DATE:</b>	<b>10/31/2015</b> <b>3 /</b> <b>03/11</b>
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PERMIT NUMBER	FEE DESCRIPTION	FEE RULE	QTY	FEE AMOUNT	FEE TOTAL	PERMIT STATUS	EQUIPMENT DESCRIPTION
N-2253-1-7	615 KBtu/hr	3020-02 C	1	197.00	197.00	A	SIDE SEAM STRIPE SPRAY OPERATION (LINE #1) SERVED BY ONE SOUDRONIC MODEL FBB BODYMAKER AND ONE 0.6 MMBTU/HR FLYNN AERO FLAME AF-9 CURING TUNNEL. THE FUME HOOD (OVER THE COATING APPLICATOR AND CONVEYOR) AND CURING TUNNEL IS VENTED TO THE SHARED 8.0 MMBTU/HR SMITH THERMAL OXIDIZER
N-2253-2-7	615 KBtu/hr	3020-02 C	1	197.00	197.00	A	SIDE SEAM STRIPE SPRAY OPERATION (LINE #2) SERVED BY ONE SOUDRONIC MODEL FBB BODYMAKER AND ONE 0.6 MMBTU/HR FLYNN AERO FLAME AF-9 CURING TUNNEL. THE FUME HOOD (OVER THE COATING APPLICATOR AND CONVEYOR) AND CURING TUNNEL IS VENTED TO THE SHARED THERMAL OXIDIZER
N-2253-3-7	615 KBtu/hr	3020-02 C	1	197.00	197.00	A	SIDE SEAM STRIPE SPRAY OPERATION (LINE #3) SERVED BY ONE SOUDRONIC MODEL FBB BODYMAKER AND ONE 0.6 MMBTU/HR FLYNN AERO FLAME AF-9 CURING TUNNEL. THE FUME HOOD (OVER THE COATING APPLICATOR AND CONVEYOR) AND CURING TUNNEL IS VENTED TO THE SHARED THERMAL OXIDIZER
N-2253-4-7	615 KBtu/hr	3020-02 C	1	197.00	197.00	A	SIDE SEAM STRIPE SPRAY OPERATION (LINE #4) SERVED BY ONE ABM 420 BODYMAKER AND ONE 0.6 MMBTU/HR FLYNN AERO FLAME AF-9 CURING TUNNEL. THE FUME HOOD (OVER THE COATING APPLICATOR AND CONVEYOR) AND CURING TUNNEL IS VENTED TO THE SHARED THERMAL OXIDIZER
N-2253-6-7	615 KBtu/hr	3020-02 C	1	197.00	197.00	A	SIDE SEAM STRIPE SPRAY OPERATION (LINE #6) SERVED BY ONE SBW 270 BODYMAKER AND ONE 0.6 MMBTU/HR FLYNN AERO FLAME AF-9 CURING TUNNEL. THE FUME HOOD (OVER THE COATING APPLICATOR AND CONVEYOR) AND CURING TUNNEL IS VENTED TO THE SHARED THERMAL OXIDIZER
N-2253-7-7	615 KBtu/hr	3020-02 C	1	197.00	197.00	A	SIDE SEAM STRIPE SPRAY OPERATION (LINE #7) SERVED BY ONE SOUDRONIC MODEL FBB BODYMAKER AND ONE 0.4 MMBTU/HR SARDEE SLIX-3 CURING TUNNEL. THE FUME HOOD (OVER THE COATING APPLICATOR AND CONVEYOR) AND CURING TUNNEL IS VENTED TO THE SHARED THERMAL OXIDIZER
N-2253-8-7	615 KBtu/hr	3020-02 C	1	197.00	197.00	A	SIDE SEAM STRIPE SPRAY OPERATION (LINE #8) SERVED BY ONE SOUDRONIC MODEL FBB BODYMAKER AND ONE 0.4 MMBTU/HR SARDEE SLIX-3 CURING TUNNEL. THE FUME HOOD (OVER THE COATING APPLICATOR AND CONVEYOR) AND CURING TUNNEL IS VENTED TO THE SHARED THERMAL OXIDIZER
N-2253-9-7	615 KBtu/hr	3020-02 C	1	197.00	197.00	A	SIDE SEAM STRIPE SPRAY OPERATION (LINE #9) SERVED BY ONE SOUDRONIC MODEL FBB BODYMAKER AND ONE 0.4 MMBTU/HR SARDEE SLIX-3 CURING TUNNEL. THE FUME HOOD (OVER THE COATING APPLICATOR AND CONVEYOR) AND CURING TUNNEL IS VENTED TO THE SHARED THERMAL OXIDIZER

**Detailed Facility Report**  
For Facility=2253 and excluding Deleted Permits  
Sorted by Facility Name and Permit Number

PERMIT NUMBER	FEE DESCRIPTION	FEE RULE	QTY	FEE AMOUNT	FEE TOTAL	PERMIT STATUS	EQUIPMENT DESCRIPTION
N-2253-15-8	9,215 KBtu/hr	3020-02 G	1	815.00	815.00	A	SHEET COATING OPERATION #2 CONSISTING OF A WAGNER MODEL 15X44-A SHEET COATER AND A SHARED 8.6 MMBTU/HR YOUNG BROS. KELGRAF OVEN WITH MAXON CYCLOMAX LOW NOX BURNERS. THE COATING APPLICATION EQUIPMENT AND THE OVEN ARE ALL VENTED TO THE SHARED THERMAL OXIDIZER
N-2253-16-8	4,608 KBtu/hr	3020-02 F	1	607.00	607.00	A	SHEET COATING OPERATION #3 CONSISTING OF A WAGNER MODEL 15X44-A SHEET COATER AND A SHARED 8.6 MMBTU/HR YOUNG BROS. KELGRAF OVEN WITH MAXON CYCLOMAX LOW NOX BURNERS. THE COATING APPLICATION EQUIPMENT AND THE OVEN ARE ALL VENTED TO THE SHARED THERMAL OXIDIZER
N-2253-17-8	9,215 KBtu/hr	3020-02 G	1	815.00	815.00	A	SHEET COATING OPERATION #4 CONSISTING OF A WAGNER MODEL 15X44-A SHEET COATER AND A SHARED 8.6 MMBTU/HR YOUNG BROS. KELGRAF OVEN WITH MAXON CYCLOMAX LOW NOX BURNERS. THE COATING APPLICATION EQUIPMENT AND THE OVEN ARE ALL VENTED TO THE SHARED THERMAL OXIDIZER
N-2253-18-8	4,608 KBtu/hr	3020-02 F	1	607.00	607.00	A	UV TYPE SHEET COATING OPERATION #1 CONSISTING OF A CRABTREE MODEL 13X45-F1 SHEET COATER. THE SHARED OVEN FROM PERMIT UNITS N-2253-15, N-2253-16, AND N-2253-17 MAY SERVE THE PRODUCTS MANUFACTURED FROM THIS PERMIT UNIT
N-2253-19-4	8,000 Gallon Aboveground Storage Tank	3020-05 B	1	93.00	93.00	A	COATING STORAGE TANK #1 CONSISTING OF ONE 8,000 GALLON ABOVEGROUND VERTICAL FIXED ROOF STORAGE TANK
N-2253-20-4	8,000 Gallon Aboveground Storage Tank	3020-05 B	1	93.00	93.00	A	COATING STORAGE TANK #2 CONSISTING OF ONE 8,000 GALLON ABOVEGROUND VERTICAL FIXED ROOF STORAGE TANK
N-2253-21-3	615 KBtu/hr	3020-02 C	1	197.00	197.00	A	SIDE SEAM STRIPE SPRAY OPERATION (LINE #10) SERVED BY ONE SOUDRONIC MODEL AFB 1075 BODYMAKER AND ONE 0.6 MMBTU/HR SOUDRONIC MODEL LSC-12 CURING TUNNEL. THE FUME HOOD (OVER THE COATING APPLICATOR AND CONVEYOR) AND CURING TUNNEL ARE SERVED BY THE SHARED THERMAL OXIDIZER
N-2253-22-1	571 kbtu/hr	3020-02 C	1	197.00	197.00	A	SIDE SEAM STRIPE SPRAY OPERATION (LINE #5) SERVED BY ONE SOUDRONIC MODEL AFB-860 BODYMAKER AND ONE 0.4 MMBTU/HR SOUDRONIC MODEL USC-15 CURING TUNNEL. A FUME HOOD OVER THE COATING APPLICATOR, CONVEYOR, AND CURING TUNNEL ARE VENTED TO THE SHARED 8.0 MMBTU/HR SMITH THERMAL OXIDIZER

Number of Facilities Reported: 1

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# ATTACHMENT F

Facility Comments/District Responses

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**1. Facility Comment:** Recordkeeping Condition for Facility-Wide Requirements N-2253-0-3

Comment 1: Condition 9 of the facility-wide requirements states: *"The operator shall retain records of all required monitoring data ... and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings."*

Ball Metal Food Container Corp. does not have paper chart recorders. We maintain our continuous monitoring and backup data electronically. Please add "or electronic data" to the end of the condition.

**District Response:**

The requested change has been made to Condition 9 of the facility-wide requirements. The current facility-wide requirements include the provision to retain electronic data but this was inadvertently replaced with a standard condition that did not include this language.

**2. Facility Comment:** Requirements for Permit Units N-2253-1, -2, -3, -4, -6, -7, -8, & -9, Conditions 18 & 19

Comment 2: Permit unit N-2253-22 is not included in the combined daily and annual VOC emission limits for the side seam lines in the list of units in conditions 18 and 19.

**District Response:**

The conditions for Authority to Construct (ATC) N-2253-22-0 did not include permit unit N-2253-22 under the combined daily VOC emission limit for permit units N-2253-1, -2, -3, -4, -6, -7, -8, & -9. The conditions for ATC N-2253-22-0 did include permit unit N-2253-22 under the combined annual VOC emission limit for the units but this limit did not get included in the requirements for the existing permit units. Condition 19 of permit units N-2253-1, -2, -3, -4, -6, -7, -8, & -9 has been administratively updated to reflect inclusion of permit unit N-2253-22 in the combined annual VOC emission limit. Please note that future modifications to include or exclude specific permit units from combined emission limits that are based on New and Modified Source Review (NSR) will require an ATC for each of the units that include the combined emission limit as a permit condition.

**3. Facility Comment:** Requirements for Permit Unit N-2253-22: Missing Combined Daily Emission Limit

Comment 3: The requirements of permit unit N-2253-22 do not include the combined daily VOC emission limit for the side seam lines

**District Response:**

The conditions for ATC N-2253-22-0 did not include permit unit N-2253-22 under the combined daily VOC emission limit for permit units N-2253-1, -2, -3, -4, -6, -7, -8, & -9. The ATC N-2253-22-0 only included an individual daily VOC emission limit of 100 lb/day, which has been included as Condition 16 of the requirements of unit N-2253-22-1. Adding the combined daily VOC emission limit to the requirements is an NSR modification that requires an ATC and therefore cannot be performed under this Title V Renewal project.

**4. Facility Comment:** Requirements for Permit Units N-2253-1, -2, -3, -4, -6, -7, -8, -9, -21, & -22: Side seam coating operations do not require the thermal oxidizer to comply with District Rule 4604

Comment 4: Section 5.2.8 of Rule 4604 is not applicable to the side seam coating operations because the all of the side seam coatings used at the facility meet the limits in Rule 4604, 5.1 Table 2, amended September 20, 2007 and the Regenerative Thermal Oxidizer is not used as means for complying with Rule 4604. Based on this information, Ball requests the following: 1) the capture testing frequency stated for each of the Side Seam units (N-2253-1, -2, -3, -4, -6, -7, -8, -9, -21, & -22) remain at once every five years, 2) removal of the reference to Rule 4604, 5.2.8.3 from Condition 29 of the requirements for the units (Condition 28 for unit -22), and removal of Conditions 31 and 32 of the requirements of the units (Conditions 30 and 31 for unit -22).

**District Response:**

The capture testing frequency stated for each of the Side Seam units (N-2253-1, -2, -3, -4, -6, -7, -8, -9, -21, & -22) has been corrected to the original term of once every five years. Reference to Rule 4604, 5.2.8.3 has been removed from the conditions for the side seam coating operations that require testing of the thermal oxidizer. Reference to Rule 4604 has been removed from Condition 31 of the requirements for the units (Condition 30 for unit -22). Condition 32 of the requirements for the units (Condition 31 for unit -22) has been removed.