

Title V Permit Evaluation

Site Number: A0273

Site Name: Pechiney Plastic Packaging, Inc.

Site Address: 6590 Central Avenue, Newark CA 94560

Periodic Monitoring:

Summary Tables

VOC Sources

S# & Description	Fed. Enf. Emission Limit Citation	Federally Enforceable Emission Limit	Potential to Emit: tpy	Monitoring
S-1 Rotogravure Coater at Extruder Laminator #11	BAAQMD Condition #14373, part 1(c)	75% (wt) or greater overall VOC collection and destruction efficiency	0.37	Mechanical interlock between source and A-2 Catalytic Incinerator (continuous, proposed)
S-2 Drying Oven at Extruder Laminator #11 (natural gas)	BAAQMD Condition #14373, part 1(c)	75% (wt) or greater overall VOC collection and destruction efficiency	0.37	Mechanical interlock between source and A-2 Catalytic Incinerator (continuous, proposed)
S-3 Flexographic Press P-2	BAAQMD Condition #14373, part 1(c)	75% (wt) or greater overall VOC collection and destruction efficiency	7	Mechanical interlock between source and A-2 Catalytic Incinerator (continuous, proposed)
S-4 Between-Color Drying Oven at Flexographic Press P-2 (natural gas)	BAAQMD Condition #14373, part 1(c)	75% (wt) or greater overall VOC collection and destruction efficiency	7	Mechanical interlock between source and A-2 Catalytic Incinerator (continuous, proposed)
S-5 Overhead Oven at Flexographic Press P-2 (natural gas)	BAAQMD Condition #14373, part 1(c)	75% (wt) or greater overall VOC collection and destruction efficiency	7	Mechanical interlock between source and A-2 Catalytic Incinerator (continuous, proposed)
S-6 Ink Decks #1 - #3 at 6-Color Flexographic Press P-3	BAAQMD Condition #14373, part 1(c)	75% (wt) or greater overall VOC collection and destruction efficiency	1.6	Mechanical interlock between source and A-2 Catalytic Incinerator (continuous, proposed)

VOC Sources

S# & Description	Fed. Enf. Emission Limit Citation	Federally Enforceable Emission Limit	Potential to Emit: tpy	Monitoring
S-7 Ink Decks #4 - #6 at 6-Color Flexographic Press P-3	BAAQMD Condition #14373, part 1(c)	75% (wt) or greater overall VOC collection and destruction efficiency	1.6	Mechanical interlock between source and A-2 Catalytic Incinerator (continuous, proposed)
S-11 Gravure Station #1 at Coater #14	BAAQMD Regulation 8-20-308	75% (wt) or greater overall VOC collection and destruction efficiency	2	Temperature Gauge (continuous, existing)
	BAAQMD Condition #14373, part 1(b)	90% (wt) or greater VOC destruction efficiency		Temperature Chart Recorder (continuous, existing)
S-12 Gravure Station #2 at Coater #14	BAAQMD Regulation 8-20-308	75% (wt) or greater overall VOC collection and destruction efficiency	2	Temperature Gauge (continuous, existing)
	BAAQMD Condition #14373, part 1(a)	97% (wt) or greater VOC destruction efficiency		Temperature Chart Recorder (continuous, existing)
S-13 Drying Oven #1 at Coater #14 (natural gas)	BAAQMD Regulation 8-20-308	75% (wt) or greater overall VOC collection and destruction efficiency	2	Temperature Gauge (continuous, existing)
	BAAQMD Condition #14373, part 1(b)	90% (wt) or greater VOC destruction efficiency		Temperature Chart Recorder (continuous, existing)
S-14 Drying Oven #2 at Coater #14 (natural gas)	BAAQMD Regulation 8-20-308	75% (wt) or greater overall VOC collection and destruction efficiency	2	Temperature Gauge (continuous, existing)
	BAAQMD Condition #14373, part 1(b)	90% (wt) or greater VOC destruction efficiency		Temperature Chart Recorder (continuous, existing)
S-15 Drying Oven #3 at Coater #14 (natural gas)	BAAQMD Regulation 8-20-308	75% (wt) or greater overall VOC collection and destruction efficiency	2	Temperature Gauge (continuous, existing)
	BAAQMD Condition #14373, part 1(b)	90% (wt) or greater VOC destruction efficiency		Temperature Chart Recorder (continuous, existing)
S-17 Primer Station #1 at Extruder Laminator #15	BAAQMD Condition #14373, part 1(c)	75% (wt) or greater overall VOC collection and destruction efficiency	0.53	Mechanical interlock between source and A-2 Catalytic Incinerator (continuous, proposed)

VOC Sources

S# & Description	Fed. Enf. Emission Limit Citation	Federally Enforceable Emission Limit	Potential to Emit: tpy	Monitoring
S-18 Drying Oven #1 at Extruder Laminator #15 (natural gas)	BAAQMD Condition #14373, part 1(c)	75% (wt) or greater overall VOC collection and destruction efficiency	0.53	Mechanical interlock between source and A-2 Catalytic Incinerator (continuous, proposed)
S-19 Between-Color Dryers #1 - #3 at Press P-3 (electric)	BAAQMD Condition #14373, part 1(c)	75% (wt) or greater overall VOC collection and destruction efficiency	1.6	Mechanical interlock between source and A-2 Catalytic Incinerator (continuous, proposed)
S-20 Between-Color Dryers #4 - #6 at Press P-3 (electric)	BAAQMD Condition #14373, part 1(c)	75% (wt) or greater overall VOC collection and destruction efficiency	1.6	Mechanical interlock between source and A-2 Catalytic Incinerator (continuous, proposed)
S-24 Primer Station #2 at Extruder Laminator #15	BAAQMD Regulation 8-20-308	75% (wt) or greater overall VOC collection and destruction efficiency	0.53	Temperature Gauge (continuous, existing) Differential Pressure Measurement (continuous, existing)
	BAAQMD Condition #14373, part 1(a)	97% (wt) or greater VOC destruction efficiency		Temperature Chart Recorder (continuous, existing)
S-25 Drying Oven #2 at Extruder Laminator #15 (natural gas)	BAAQMD Regulation 8-20-308	75% (wt) or greater overall VOC collection and destruction efficiency	0.53	Temperature Gauge (continuous, existing)
	BAAQMD Condition #14373, part 1(a)	97% (wt) or greater VOC destruction efficiency		Temperature Chart Recorder (continuous, existing)
S-26 Flexographic Press P-5 w/Between-Color Dryers and Tunnel Dryer (natural gas)	BAAQMD Condition #15238, part 7	75% (wt) or greater overall VOC capture and destruction efficiency	39	Mechanical interlock between source and A-2 Catalytic Incinerator (continuous, proposed)

Discussion

The new monitoring proposed for the sources listed above is "gap-filling" monitoring for the purpose of insuring that minimum overall VOC capture and control efficiency is maintained. A mechanical interlock between the source and A-2 Catalytic Incinerator and associated blowers will insure on-going

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compliance with this emission limit. Adequate monitoring exists for all other federally enforceable emission limits.

Permit Conditions:

At the request of the applicant, minor changes have been made to permit condition #15238 to increase operational flexibility at source 26 Flexographic Printing Press P-5. The changes will not result in any increase in emissions.

Permit Shield:

None requested

Alternate Operating Scenario:

Alternate operating scenarios were requested by the applicant but have not been included in the proposed permit since they are currently allowed under existing permit conditions and regulations and such scenarios do not result in substantive changes in emissions.

Compliance Status:

There are currently no sources out of compliance.

Alignment of Information in Application and Proposed Permit:

The are no major discrepancies between the application submitted and the proposed Title V permit.