



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT

DEC 21 2010

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

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

Dear Mr. Bennett:

Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued Authority to Construct N-2174-24-6 into the Title V operating permit. Silgan Containers has proposed to modify an existing waste coatings and solvents storage tank to increase the true vapor pressure limit from 1.5 psia to 11 psia and to add a carbon absorption system for VOC control.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued Authority to Construct N-2174-24-6, application, and previous Title V permit. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

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

Sincerely,

David Warner
Director of Permit Services

DW/JH:dg

Enclosures

Seyed Sadredin
Executive Director/Air Pollution Control Officer

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

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061
www.valleyair.org

Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: (661) 392-5500 FAX: (661) 392-5585



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT

DEC 21 2010

Gerardo C. Rios, Chief
Permits Office
Air Division
U.S. EPA - Region IX
75 Hawthorne St
San Francisco, CA 94105

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

Dear Mr. Rios:

Enclosed for you to review is an application for minor Title V permit modification for the facility identified above. Silgan Containers Mfg. Corp. is proposing a Title V minor permit modification to incorporate the recently issued Authority to Construct N-2174-24-6 into the Title V operating permit. Silgan Containers has proposed to modify an existing waste coatings and solvents storage tank to increase the true vapor pressure limit from 1.5 psia to 11 psia and to add a carbon absorption system for VOC control.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued Authority to Construct N-2174-24-6, application, and previous Title V permit. Please submit your written comments on this project within the 45-day comment period that begins on the date you receive this letter.

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

Sincerely,



David Warner
Director of Permit Services

DW/JH:dg

Enclosures

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TITLE V APPLICATION REVIEW

Minor Modification
Project #: N-1091432

Engineer: James Harader
Date: December 15, 2010

Facility Number: N-2174
Facility Name: Silgan Containers Mfr. Corp.
Mailing Address: 3250 Patterson Road
Riverbank, CA 95367

Contact Name: Bob Bennett
Phone: (209) 863-3116

Responsible Official: Gary Miller
Title: Plant Manager

I. PROPOSAL

Silgan Containers is proposing a Title V minor permit modification to incorporate the recently issued ATC N-2174-24-6 into the Title V operating permit. This ATC is for the modification of a waste coatings and solvents tank to increase the true vapor pressure limit and to add carbon absorption filters for VOC control. Pursuant to the application review for District Project N-1091431, this proposal will not result in an increase in emissions.

The purpose of this evaluation is to identify all applicable requirements, determine if the facility will comply with the applicable requirements and to provide the legal and factual basis for the proposed revisions.

II. FACILITY LOCATION

This facility is located at 3250 Patterson Road in Riverbank, CA.

III. EQUIPMENT DESCRIPTION

N-2174-24-7: ONE 5,000 GALLON FIXED ROOF STORAGE TANK (TANK HW) FOR WASTE COATINGS AND SOLVENTS WITH ALL TANK VAPORS CONTROLLED BY TWO 200 LB US FILTER MODEL VSC200 CARBON ABSORPTION FILTERS IN SERIES

IV. SCOPE OF EPA AND PUBLIC REVIEW

This change to a Title V permit is considered to be a minor modification and, as such, requires no public review.

V. APPLICABLE REQUIREMENTS

District Rule 2520, Federally Mandated Operating Permits (Adopted June 21, 2001)

VI. DESCRIPTION OF PROPOSED MODIFICATIONS

Silgan containers is proposing to increase the true vapor pressure limit for permit unit N-2174-24, a waste coatings and solvents storage tank. Additionally, the facility is proposing to install two 200 lb US Filter Model VSC200 carbon absorption Filters, in series. The carbon absorption system is expected to achieve at least 90% control of VOC emissions. The following outlines the proposed modifications to the permit:

Permit condition #1 on the current Permit to Operate (N-2174-24-4) has been modified to clarify that waste coatings and solvents are stored in the tank. The revised requirement is included on the new Permit to Operate (N-2174-24-7) as condition #2.

Permit condition #3 on the current Permit to Operate (N-2174-24-4) has been modified to increase the true vapor pressure limit for the stored tank contents to 11 psia. The revised requirement is included on the new Permit to Operate (N-2174-24-7) as condition #6.

Permit condition #4 on the current Permit to Operate (N-2174-24-4) required the tank to be kept in a gas-tight condition. The tank is now controlled by an carbon absorption system; therefore, this condition is no longer necessary and has been removed from the permit.

Permit condition #6 on the current Permit to Operate (N-2174-24-4) has been modified to clarify that waste coatings and solvents are stored in the tank. The revised requirement is included in the new Permit to Operate (N-2174-24-7) as condition #7.

Permit condition #8 on the current Permit to Operate (N-2174-24-4) includes requirements for measuring the true vapor pressure of an organic liquid. This condition has been modified to add the ability for alternate methods of determining the true vapor pressure, provided prior approval is obtained from the District and EPA. The revised requirement is included in the new Permit to Operate (N-2174-24-7) as condition #9.

Permit Condition #1 on the Authority to Construct (N-2174-24-6) states that the applicant must submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. The applicant has satisfied this requirement. Therefore, this requirement will not be transferred to the new Permit to Operate (N-2174-24-7).

Permit Condition #2 on the Authority to Construct (N-2174-24-6) is already listed on the facility-wide permit (N-2174-0). Therefore, this requirement will not be transferred to the new Permit to Operate (N-2174-24-7).

Permit Condition #3 on the Authority to Construct (N-2174-24-6) is already listed on the facility-wide permit (N-2174-0). Therefore, this requirement will not be transferred to the new Permit to Operate (N-2174-24-7).

Permit condition #6 on the Authority to Construct (N-2174-24-6) limits the VOC control efficiency of the carbon absorption system to 90% or greater. This requirement will be included on the new Permit to Operate (N-2174-24-7) as condition #3.

Permit condition #8 on the Authority to Construct (N-2174-24-6) lists daily and annual VOC emission limits for this operation. This requirement will be included on the new Permit to Operate (N-2174-24-7) as condition #5.

Permit conditions #14 through #16 on the Authority to Construct (N-2174-24-6) include monitoring, operational, and maintenance requirements for the new carbon canister system. These requirements have been included on the new permit to Operate (N-2174-24-7) as conditions #11 through #13.

Permit conditions #19 and #20 on the Authority to Construct (N-2174-24-6) limit facility-wide HAP emissions. These requirements are already listed on the facility-wide permit (N-2174-0). Therefore, they will not be transferred to the new Permit to Operate (N-2174-24-7).

VII. COMPLIANCE

In accordance with Rule 2520, 3.20, these modifications:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;
3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:
 - a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
 - b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; and
5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
6. Do not seek to consolidate overlapping applicable requirements.

In accordance with Rule 2520, the application meets the procedural requirements of section 11.4 by including;

1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
2. The source's suggested draft permit; and
3. Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used.

Silgan Containers Mfr. Corp.
Facility # N-2174
Project # N-1091432

October 6, 2010

VIII. ATTACHMENTS

- A. Proposed Modified Title V Operating Permit No. N-2174-24-7
- B. Authority to Construct No. N-2174-24-6
- C. Application
- D. Previous Title V Operating Permit No. N-2174-24-4

ATTACHMENT A

Proposed Modified Title V Operating Permit No.
N-2174-24-7

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-2174-24-7

EXPIRATION DATE: 09/30/2007

EQUIPMENT DESCRIPTION:

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

PERMIT UNIT REQUIREMENTS

1. The storage tank shall be equipped with a pressure-vacuum (PV) relief valve shall be set to within 10% of the maximum allowable working pressure of the tank, permanently labeled with the operating pressure settings, properly maintained in good operating order in accordance with the manufacturer's instructions, and shall remain in gas-tight condition except when the operating pressure exceeds the valve's set pressure. [District NSR Rule and Rule 4623, 5.2] Federally Enforceable Through Title V Permit
2. Only waste coatings and solvents shall be stored in this tank. [District NSR Rule] Federally Enforceable Through Title V Permit
3. The VOC control efficiency of the carbon absorption system shall be 90% or greater. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The maximum throughput shall not exceed 5,000 gallons in any one day and 60,000 gallons in any one calendar year. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Controlled emissions from the tank, served by the carbon absorption system, shall not exceed 7.7 lb-VOC/day or 200 lb-VOC/year. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The true vapor pressure (TVP) of the organic liquid stored in the tank shall be less than 11 psia at the actual storage temperature of the tank contents. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The operator shall determine the true vapor pressure of the organic liquid stored in the tank at least once per year in accordance with methods described in 40 CFR 60.113 and section 6.2 of District Rule 4623 (amended 5/19/05). Determinations shall be made annually during the summer and whenever there is a change in the source or type of the hazardous waste liquid entering the tank. [District Rules 2201 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
8. The TVP testing shall be conducted at actual storage temperature of the organic liquid in the tank. [District Rule 2201] Federally Enforceable Through Title V Permit
9. For organic liquids, the true vapor pressure (TVP) shall be measured using Reid vapor pressure ASTM Method D323, and converting the RVP to TVP at the tank's maximum organic liquid storage temperature. The conversion of RVP to TVP shall be done in accordance of the oil and gas section of "California Air Resources Boards (ARB) Technical Guidance Document to the Criteria and Guidelines Regulations for AB 2588", dated August 1989. Alternate methods of determining the true vapor pressure may be utilized if prior approval is obtained from the District and EPA. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

Facility Name: SILGAN CONTAINERS MFR. CORP.
Location: 3250 PATTERSON ROAD, RIVERBANK, CA 95367
N-2174-24-7; Oct 6 2010 6:07PM - HARADERJ

10. The operator shall keep and shall submit records of TVP testing conducted in accordance with the requirements of District Rule 4623 Section 6.2 to the APCO within 45 days after the date of testing. The records shall include the tank identification number, Permit to Operate number, TVP of the stored organic liquid, test methods used, ambient temperature at the time the test was conducted, and a copy of the test results. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The operator shall perform monthly monitoring of all components associated with the waste solvent tank system using a photo ionization detector (or equivalent). The monitoring shall be conducted in accordance with EPA Method 21 and shall include the sampling point between the primary and back-up carbon canisters. The primary canister shall be replaced when measurable levels of VOC emissions are detected at the sampling point between the primary and back-up carbon canisters. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The carbon canisters removed from the system shall be sealed vapor tight. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Records shall be maintained of all maintenance activities for the carbon canister system. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The operator shall keep a record of the daily amount of material loaded into the tank and the cumulative annual amount of material loaded into the tank. [District NSR Rule] Federally Enforceable Through Title V Permit
15. All records shall be maintained on site for a period of at least five years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

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

DRAFT

ATTACHMENT B

Authority to Construct No.
N-2174-24-6



COPY

AUTHORITY TO CONSTRUCT

PERMIT NO: N-2174-24-6

ISSUANCE DATE: 09/02/2009

LEGAL OWNER OR OPERATOR: SILGAN CONTAINERS MFR. CORP.
MAILING ADDRESS: 3250 PATTERSON ROAD
RIVERBANK, CA 95367

LOCATION: 3250 PATTERSON ROAD
RIVERBANK, CA 95367

EQUIPMENT DESCRIPTION:

MODIFICATION OF ONE 5,000 GALLON FIXED ROOF STORAGE TANK (TANK HW) FOR WASTE COATINGS AND SOLVENTS TO INCREASE THE TRUE VAPOR PRESSURE LIMIT AND ADD A CARBON ADSORPTION UNIT. POST-PROJECT EQUIPMENT DESCRIPTION: ONE (1) 5,000 GALLON FIXED ROOF STORAGE TANK (TANK HW) FOR WASTE COATINGS AND SOLVENTS WITH ALL TANK VAPORS CONTROLLED BY TWO 200 LB US FILTER MODEL VSC200 CARBON ADSORPTION FILTERS IN SERIES

CONDITIONS

1. 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
2. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. 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 (12/17/92), by using EPA method 9. 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 (in all eight counties in the San Joaquin Valley)] Federally Enforceable Through Title V Permit
4. The storage tank shall be equipped with a pressure-vacuum (PV) relief valve shall be set to within 10% of the maximum allowable working pressure of the tank, permanently labeled with the operating pressure settings, properly maintained in good operating order in accordance with the manufacturer's instructions, and shall remain in gas-tight condition except when the operating pressure exceeds the valve's set pressure. [District NSR Rule and Rule 4623, 5.2] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-8400 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 Sadreain, Executive Director / APCO

DAVID WARNER, Director of Permit Services

N-2174-24-6: Sep 2 2009 9:26AM - HARADERJ : Joint Inspection NOT Required

5. Only waste coatings and solvents shall be stored in this tank. [District NSR Rule] Federally Enforceable Through Title V Permit
6. The VOC control efficiency of the carbon adsorption system shall be 90% or greater. [District Rule 2201]
7. The maximum throughput shall not exceed 5,000 gallons in any one day and 60,000 gallons in any one calendar year. [District NSR Rule]
8. Controlled emissions from the tank, served by the carbon adsorption system, shall not exceed 7.7 lb-VOC/day or 200 lb-VOC/year. [District Rule 2201]
9. The true vapor pressure (TVP) of the organic liquid stored in the tank shall be less than 11 psia at the actual storage temperature of the tank contents. [District Rule 2201]
10. The operator shall determine the true vapor pressure of the organic liquid stored in the tank at least once per year in accordance with methods described in 40 CFR 60.113 and section 6.2 of District Rule 4623 (amended 5/19/05). Determinations shall be made annually during the summer and whenever there is a change in the source or type of the hazardous waste liquid entering the tank. [District Rules 2201 and 2520, 9.3.2]
11. The TVP testing shall be conducted at actual storage temperature of the organic liquid in the tank. [District Rule 2201]
12. For organic liquids, the true vapor pressure (TVP) shall be measured using Reid vapor pressure ASTM Method D323, and converting the RVP to TVP at the tank's maximum organic liquid storage temperature. The conversion of RVP to TVP shall be done in accordance of the oil and gas section of "California Air Resources Boards (ARB) Technical Guidance Document to the Criteria and Guidelines Regulations for AB 2588", dated August 1989. Alternate methods of determining the true vapor pressure may be utilized if prior approval is obtained from the District and EPA. [District Rule 2201]
13. The operator shall keep and shall submit records of TVP testing conducted in accordance with the requirements of District Rule 4623 Section 6.2 to the APCO within 45 days after the date of testing. The records shall include the tank identification number, Permit to Operate number, TVP of the stored organic liquid, test methods used, ambient temperature at the time the test was conducted, and a copy of the test results. [District Rule 2201]
14. The operator shall perform monthly monitoring of all components associated with the waste solvent tank system using a photo ionization detector (or equivalent). The monitoring shall be conducted in accordance with EPA Method 21 and shall include the sampling point between the primary and back-up carbon canisters. The primary canister shall be replaced when measurable levels of VOC emissions are detected at the sampling point between the primary and back-up carbon canisters. [District Rule 2201]
15. The carbon canisters removed from the system shall be sealed vapor tight. [District Rule 2201]
16. Records shall be maintained of all maintenance activities for the carbon canister system. [District Rule 2201]
17. The operator shall keep a record of the daily amount of material loaded into the tank and the cumulative annual amount of material loaded into the tank. [District NSR Rule]
18. All records shall be maintained on site for a period of at least five years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit
19. 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
20. The owner/operator shall keep a record of the rolling 12-month, facility-wide emissions of each Hazardous Air Pollutant emitted. The owner/operator shall keep a record of the cumulative, rolling 12-month, facility-wide emissions of all Hazardous Air Pollutants emitted, combined. This record shall be updated monthly. [District Rules 1070, 2201, and 4002]

ATTACHMENT C

Application

Received

San Joaquin Valley Air Pollution Control District

MAR 30 2009

www.valleyair.org

Permits Srvc
SJVAPCD

Permit Application For:

[] ADMINISTRATIVE AMENDMENT [X] MINOR MODIFICATION [] SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: <u>Silgan Containers, Mfg. Corp., Riverbank</u>	
2. MAILING ADDRESS: STREET/P.O. BOX: <u>6180 Roselle Ave.,</u> CITY: <u>Riverbank</u> STATE: <u>CA</u> 9-DIGIT ZIP CODE: <u>95367</u>	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: <u>3250 Patterson Rd</u> CITY: <u>Riverbank, CA</u> ¼ SECTION _____ TOWNSHIP _____ RANGE _____	INSTALLATION DATE:
4. GENERAL NATURE OF BUSINESS: <u>Sanitary steel food can manufacture</u>	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE Silgan Containers would like to install a carbon capture system on Bulk Waste Tank N-2174-24 and have the vapor pressure limit removed. In September 2008 changes to the Can and Coil Rule, 4604, section 5.4.1, were implemented, which forced Silgan to convert various solvent cleaning operations to the exempt solvent Acetone. As Silgan places waste coatings and solvents in to the bulk waste tank, the introduction of quantities of Acetone changed the potential vapor pressure in the tank. It became necessary to place spent solvents into drums instead of using the tank. Without the addition of spent solvents to the waste tank, the solids load from waste coatings has increased the potential of plugging the tank drain. Silgan has been working with several engineering firms to find a cost effective way to capture tank emissions from the conservation vent, allowing the vapor pressure limit to be removed. The requested change will result in an emission reduction.	
6. TYPE OR PRINT NAME OF APPLICANT: Robert Bennett	TITLE OF APPLICANT: Env. Engineer
7. SIGNATURE OF APPLICANT: 	DATE: 3/19/09 PHONE: (209) 863-3116 FAX: (209) 863-3131 EMAIL: bbennett@silgancontainers.com

For APCD Use Only:

DATE STAMP	FILING FEE RECEIVED: \$ _____ CHECK#: _____
	DATE PAID: _____
	PROJECT NO: <u>N-1091432</u> FACILITY ID: <u>N-2174</u>

San Joaquin Valley Air Pollution Control District

TITLE V COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box) Minor Permit Modification

INITIAL TITLE V PERMIT

PERMIT RENEWAL

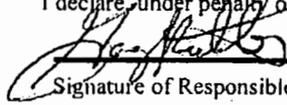
NEW TITLE V PERMIT

COMPANY NAME: Silgan Containers Mfg. Corp., Riverbank	FACILITY ID: N - 2174
1. Type of Organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name: Silgan Containers Mfg. Corp.	
3. Agent to the Owner: Gary Miller, Plant Manager	
4. Compliance Certifications will be submitted on:	
year 1: ___/___/___ year 2: ___/___/___ year 3: ___/___/___ year 4: ___/___/___ year 5: ___/___/___	
Other dates if required by regulations or compliance schedule: _____	

II. COMPLIANCE CERTIFICATION (Read each statement carefully and initial each circle for confirmation):

- Based on information and belief formed after reasonable inquiry, the source identified in this application will continue to comply with the applicable federal requirement(s) which the source is in compliance as identified in the Compliance Plan.
- Based on information and belief formed after reasonable inquiry, the source identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term as identified in the Compliance Plan, on a timely basis.
- NO Based on information and belief formed after reasonable inquiry, the source identified in this application is not in compliance at the time of permit issuance with the applicable federal requirement(s), as identified in the Compliance Plan, and I have attached a compliance schedule.
- Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
- Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete

I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:


Signature of Responsible Official

9/9/09
Date

Gary Miller
Name of Responsible Official (please print)

Plant Manager
Title of Responsible Official (please print)

ATTACHMENT D

Previous Title V Operating Permit No.
N-2174-24-4

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-2174-24-4

EXPIRATION DATE: 09/30/2007

EQUIPMENT DESCRIPTION:

ONE (1) 5,000 GALLON FIXED ROOF STORAGE TANK (TANK HW) FOR WASTE COATINGS AND SOLVENTS

PERMIT UNIT REQUIREMENTS

1. Only hazardous waste shall be stored in this tank. [District NSR Rule] Federally Enforceable Through Title V Permit
2. The maximum amount of material throughput shall not exceed 5,000 gallons in any one day and 60,000 gallons in any one calendar year. [District NSR Rule] Federally Enforceable Through Title V Permit
3. True vapor pressure of the hazardous waste liquid introduced to the tank shall not exceed 1.5 psia at liquid temperature. [District Rules 4623, 2.0 and 2010] Federally Enforceable Through Title V Permit
4. This tank shall be in a gas-tight condition. A gas-tight condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit and Rule 4623 (5/19/05). [District Rule 4623, 3.11 & 6.4.8] Federally Enforceable Through Title V Permit
5. The storage tank shall be equipped with a pressure-vacuum (PV) relief valve shall be set to within 10% of the maximum allowable working pressure of the tank, permanently labeled with the operating pressure settings, properly maintained in good operating order in accordance with the manufacturer's instructions, and shall remain in gas-tight condition except when the operating pressure exceeds the valve's set pressure. [District NSR Rule and Rule 4623, 5.2] Federally Enforceable Through Title V Permit
6. The operator shall determine the true vapor pressure of the hazardous waste liquid stored in the tank at least once per year in accordance with methods described in 40 CFR 60.113 and section 6.2 of District Rule 4623 (amended 5/19/05). Determinations shall be made annually during the summer and whenever there is a change in the source or type of the hazardous waste liquid entering the tank. [District Rules 2520, 9.3.2 and 4623 6.2] Federally Enforceable Through Title V Permit
7. The TVP testing shall be conducted at actual storage temperature of the organic liquid in the tank. [District Rule 4623, 6.2.1.2] Federally Enforceable Through Title V Permit
8. For organic liquids, the true vapor pressure (TVP) shall be measured using Reid vapor pressure ASTM Method D323, and converting the RVP to TVP at the tank's maximum organic liquid storage temperature. The conversion of RVP to TVP shall be done in accordance of the oil and gas section of "California Air Resources Boards (ARB) Technical Guidance Document to the Criteria and Guidelines Regulations for AB 2588", dated August 1989. [District Rule 4623, 6.4.3] Federally Enforceable Through Title V Permit
9. An operator shall submit the records of TVP testing conducted in accordance with the requirements of Section 6.2 to the APCO within 45 days after the date of testing. The record shall include the tank identification number, Permit to Operate number, type of stored organic liquid, TVP of the stored organic liquid, test methods used, and a copy of the test results. [District Rule 4623, 6.3.6] Federally Enforceable Through Title V Permit
10. The operator shall keep accurate records of types, storage temperature, and TVP of hazardous waste liquids stored. [District Rules 2520, 9.3.2 and 4623, 6.3.1] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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11. Records shall be maintained on the premises indicating the daily amount of material loaded into the tank and the cumulative annual amount of material loaded into the tank. [District NSR Rule] Federally Enforceable Through Title V Permit
12. All records shall be maintained on site for a period of at least five years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit
13. 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
14. Permittee shall use District approved emission estimating techniques to determine HAP emissions. Permittee shall maintain monthly records and annual records for each emission unit or group of emission units sufficient to determine HAP emissions. [District NSR Rule, District Rule 1070, and District Rule 2520 9.3.2] Federally Enforceable Through Title V Permit

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