

**STATEMENT OF BASIS FOR
ADMINISTRATIVE PERMIT AMENDMENT
TITLE V FEDERAL OPERATING PERMIT**

Application No.:	<u>TV2005-15-01A</u>
Date:	<u>June 03, 2010</u>
Reviewing Engineer:	<u>Bruce Nixon</u>

A. FACILITY INFORMATION:

Facility Name: Silgan Can Company

Location: 6200 Franklin Boulevard, Suite 100
Sacramento, CA 95824

Mailing Address: 6200 Franklin Boulevard, Suite 100
Sacramento, CA 95824

Responsible Official: Jim Moses, Plant Manager
(916) 399-2594

Contact Person: Jim Moses, Plant Manager
(916) 399-2594

B. PURPOSE OF THIS STATEMENT OF BASIS:

The Title V Federal Operating Permit is intended to be a document containing only enforceable terms and conditions as well as any additional information, such as the identification of emission units, emission points, emission sources and processes, that makes the terms meaningful. 40 CFR Part 70.7(a)(5) requires that each Title V permit have an accompanying "...statement that sets forth the legal and factual basis for the draft permit conditions". The purpose of this Statement of Basis is to satisfy the above requirement by providing pertinent details regarding the permit/application data and permit conditions in a more easily understandable format. This report will also include background narrative and explanations of regulatory decisions made by the reviewer. It should be emphasized that this Statement of Basis, while based on information contained in the permit, is a separate document and is not itself an enforceable term and condition of the permit.

In addition to this Statement of Basis, the information contained in the Statement of Basis for the 08-29-2006 Title V permit renewal, TV2005-15-01, is applicable to the facility.

C. PERMIT ACTIONS:

Previous Permit Actions

This Statement of Basis is for the 1st administrative amendment of Title V Federal Operating Permit No. TV2005-15-01 issued to Silgan Can Company on 08-29-2006.

The following permit actions have occurred since the initial Federal Operating Permit No. TV1999-15-01 was issued:

<u>Permit Action</u>	<u>Date Issued</u>	<u>Permit No.</u>
Initial permit issued	08-29-2001	TV1999-15-01
1st Administrative Amendment	11-25-2002	TV1999-15-01A
1st Minor Modification	07-26-2005	TV1999-15-02
1st Permit Renewal	08-29-2006	TV2005-15-01

Current Permit Action

This 1st administrative amendment to the 1st Permit Renewal will be assigned the following permit number: TV2005-15-01A. The adding of sequential alphabet letters to the current permit number will indicate an administrative permit amendment.

The specific changes to the Title V permit are described in Section E below.

D. FACILITY DESCRIPTION:

Silgan Can Company manufactures steel cans for the food canning industry. They purchased their Sacramento facility from Campbell Soup Company in June 1998. They are located on the same site as the Campbell Soup Supply Company, LLC and they supply cans to the Campbell Soup Supply Company, LLC.

Silgan Can Company produces both two-piece and three-piece cans. The air pollutant emissions from three-piece can manufacturing have changed significantly from what they were when Campbell Soup was conducting the operation. The three-piece can manufacturing process no longer produces air pollutant emissions and is considered exempt equipment for this permit evaluation.

The two-piece can manufacturing process and related processes are described below.

Drawn and Ironed (D and I) Can Production:

The process of manufacturing Drawn and Ironed cans begins with the receipt of steel coil stock. The coil is unwound, fed through the lubricator, and finally the cupping press. The formed cups are fed to the bodymakers where, through a punch and ring assembly, the can body is formed by the draw and ironing technique with an integral bottom. Lubrication oils are applied to facilitate the mechanical action and act as a coolant. No significant emissions result from this first phase of the D and I can production.

Following this operation, the cans enter the trimmer where excess metal around the can rim is removed to give a uniform height to the can body. After trimming, the unfinished can is transported to the washer where the lubricator oils are removed. The can body is then treated by a flow coating application of a water borne enamel. After the flow coat application of the enamel, the enameled can body enters the wash coat oven.

After the oven, the can body goes to the flanger where the rim of the can body is flanged. The can then goes to the beader where concentric rings are impressed on the side wall of the can. From here the can body passes to the tester to approve the integrity of the container.

The next step of the process is to apply a water borne inside spray enamel to the inside can body. This coating is similar in composition to the washcoat enamel. This coating is applied in an enclosed machine, where overspray and solvent wash-off is captured and ducted to a thermal oxidizer. There are eight (8) spray machines at the Sacramento Facility. The cans are then conveyed in a covered conveyor to the inside bake oven.

Both ovens, the spray machine manifold, and the covered conveyor are vented to a 15,000 scfm thermal oxidizer which typically operates at 1500 °F with a retention time of 1 second.

D. FACILITY DESCRIPTION (continued):

Drawn and Ironed Can Production Line

Process Description	Source Description	Emission Type	Emission Point
Drawn and Ironed Can Manufacturing	Outside Washcoat	Point	Coater Vent
	Washcoat Oven	Point	Thermal Oxidizer Stack
	Washcoat Process Fugitives	Fugitive	Building
	Inside Spray Machines	Point	Thermal Oxidizer Stack
	Inside Spray Process Fugitives	Fugitive	Building
	Covered Conveyor	Point	Thermal Oxidizer Stack
	Inside Bake Oven	Point	Thermal Oxidizer Stack

Maintenance and Support Activities:

These activities are performed for the purpose of maintenance, repair and upkeep of the facility equipment and grounds. Examples of these types of activities include welding, degreasing, use of lubricants, forklift activity, architectural coating, grounds maintenance, vehicle traffic, work performed by contractors, etc. The facility exclusively uses solvents for cleanup and degreasing that do not contain reactive organic compounds (ROC) or halogenated compounds.

Storage Tanks:

The bulk storage tanks for liquid or gaseous compounds all fall into the exempt equipment category. There are also a number of small, sealed drums and containers which are not expected to emit any type of air pollutants.

E. DESCRIPTION OF TITLE V PERMIT AMENDMENT:

Administrative Permit Amendment Request No. 1

In a Title V permit application dated September 26, 2007 the Plant Manager for Silgan Can Company requested that the list of approved coatings shown in Attachment A - List of Approved Coatings for Title V Permit No. TV2005-15-01 be amended to include a wash coat coating designated as PPG 1026810.

The relevant properties of the PPG 1026810 wash coat coating are -

- VOC content:
- i. 1.90 lb VOC/gallon of coating excluding water and exempt solvents
[227 grams VOC/liter of coating excluding water and exempt solvents]
 - ii. 2.54 lb VOC/gallon of coating solids

Based on the information supplied by PPG the use of PPG 1026810 is approved because it will emit less VOC than the limits established in Condition No. 2 of the Title V permit.

- 2. The VOC content of coatings used in the wash coat process shall not exceed 250 grams/liter of coating (excluding water and exempt solvents) and 2.8 lb/gal of solids.

Equipment Modifications:

There are no additions or deletions to the equipment listed in the Title V permit.

Emission Modifications:

There are no changes to the allowable mass emissions.

Basis for the Applicable Federally Enforceable Requirements:

SMAQMD Rule 201 General Permit Requirements
SMAQMD Rule 202 New Source Review
SMAQMD Rule 207 Title V - Federal Operating Permit Program
SMAQMD Rule 401 Ringelmann Chart
SMAQMD Rule 406 Specific Contaminants
SMAQMD Rule 420 Sulfur Content of Fuels
SMAQMD Rule 452 Can Coating

Compliance Status:

Silgan Can Company complies with the applicable federally enforceable requirements.

E. DESCRIPTION OF TITLE V PERMIT AMENDMENT (continued):

Category of Title V Permit Modification (see categories in Attachment B):

This change qualifies as an administrative permit amendment because it is only a change to the list of coatings that are in use at the facility. All of the coatings included on the list comply with the VOC requirements stated in the Title V permit TV2005-15-01 Condition Nos 2 and 3.

- A. The mass emission limits for the facility are not changing.
- B. The recordkeeping requirements are not changing. Silgan Can Company will still be required to keep a record of all coatings used, the coating VOC content and emissions resulting from the use of all coatings.
- C. The equipment associated with the coating process is not changing.

SMAQMD Rule 207 Section 409 provides that no public notice need be made for an administrative permit amendment.

The revised Title V Permit No. 2005-15-01A will be provided to the permittee and to U.S. EPA Region IX.

E. DESCRIPTION OF TITLE V PERMIT AMENDMENT (continued):

Administrative Permit Amendment No. 2

On September 25, 2008 the SMAQMD Board of Directors amended Rule 452 Can Coating and reduced the VOC limit for "Two Piece Can Interior Body Spray" coatings from 440 grams/liter to 420 grams/liter (3.67 lb/gallon versus 3.50 lb/gallon).

This is the first time the Title V permit has been reopened since SMAQMD Rule 452 was amended. The Title V permit VOC limit for "Two Piece Can Interior Body Spray" coatings in Condition No. 3 reflects the old VOC limit of 440 grams/liter and will be corrected to the new VOC limit of 420 grams/liter.

Old language -

3. The VOC content of coatings used in the inside spray process shall not exceed 440 grams/liter of coating (excluding water and exempt solvents) and 6.9 lb/gal of solids.

[Basis: SMAQMD Rules 202 and 452]

New language -

3. The VOC content of coatings used in the inside spray process shall not exceed 420 grams/liter of coating (excluding water and exempt solvents) and 6.9 lb/gal of solids.

[Basis: SMAQMD Rules 202 and 452]

Equipment Modifications:

There are no additions or deletions to the equipment listed in the Title V permit.

Emission Modifications:

There are no changes to the allowable mass emissions.

Basis for the Applicable Federally Enforceable Requirements:

SMAQMD Rule 201 General Permit Requirements
SMAQMD Rule 202 New Source Review
SMAQMD Rule 207 Title V - Federal Operating Permit Program
SMAQMD Rule 401 Ringelmann Chart
SMAQMD Rule 406 Specific Contaminants
SMAQMD Rule 420 Sulfur Content of Fuels
SMAQMD Rule 452 Can Coating

Compliance Status:

Silgan Can Company complies with the applicable federally enforceable requirements.

E. DESCRIPTION OF TITLE V PERMIT AMENDMENT (continued):

Category of Title V Permit Modification (see categories in Attachment B):

This change qualifies as an administrative permit amendment because it is only a correction to the VOC limit stated in SMAQMD Rule 452 for inside body spray coatings that are in use at the facility. All of the inside body spray coatings used at the facility comply with the VOC requirements of SMAQMD Rule 452.

- A. The mass emission limits for the facility are not changing.
- B. The recordkeeping requirements are not changing. Silgan Can Company will still be required to keep a record of all coatings used, the coating VOC content and emissions resulting from the use of all coatings.
- C. The equipment associated with the coating process is not changing.

SMAQMD Rule 207 Section 409 provides that no public notice need be made for an administrative permit amendment.

The revised Title V Permit No. 2005-15-01A will be provided to the permittee and to U.S. EPA Region IX.

F. APPLICABLE FEDERALLY ENFORCEABLE GENERAL REQUIREMENTS AND EQUIPMENT SPECIFIC REQUIREMENTS:

The Applicable Federally Enforceable General Requirements and Equipment Specific Requirements will remain the same as those described in the Statement of Basis for Title V permit No. TV2005-15-01. The requirements will not be repeated here (see Title V permit file for Applicable Federally Enforceable General Requirements and Equipment Specific Requirements).

G. RECOMMENDATION:

1. Amend the Title V Federal Operating Permit as described in this Statement of Basis.
2. Because there is no requirement for public notice or U.S. EPA review of an administrative amendment, send the final Statement of Basis and the final Title V permit to the permittee and to U.S. EPA Region 9.

See final Title V Permit No. TV2005-15-01A for equipment descriptions and permit conditions.

Approved by: _____ Date: _____

ATTACHMENT A

SMAQMD RULES THAT ARE
"APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS"
FOR SILGAN CAN COMPANY

SMAQMD RULES THAT ARE
 "APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS"
 FOR SILGAN CAN COMPANY

Rule is Applicable	Rule is SIP Approved	Rule No.	Rule Title	Is the Rule an "Applicable Federally Enforceable Requirement"?
●	●	101	General Provisions and Definitions 09-03-1998 version	Yes - no related conditions are included in the permit because of general nature of the rule.
●	●	102	Circumvention 11-29-1983 version	Yes - no related conditions are included in the permit because of general nature of the rule.
	●	103	Exceptions 11-29-1983 version	No - the permittee does not operate the type of equipment described in this rule.
	●	104	General Conformity 11-03-1994 version	No - the rule's purpose is to have the SMAQMD review federal conformity findings.
●	●	105	Emission Statement 04-20-1993 version	Yes - related conditions are included in the permit.
		107	Alternative Compliance	No - it is not a SIP approved rule.
●		108	Minor Violations	No - it is not a SIP approved rule.
●	●	201	General Permit Requirements 11-20-1984 version	Yes - no related conditions are included in the permit because of the general nature of the rule.

SMAQMD RULES THAT ARE
 "APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS"
 FOR SILGAN CAN COMPANY

Rule is Applicable	Rule is SIP Approved	Rule No.	Rule Title	Is the Rule an "Applicable Federally Enforceable Requirement"?
●	●	202	New Source Review 11-20-1984 version	Yes - related conditions are included in the permit.
		203	Prevention of Significant Deterioration	No - it is not a SIP approved rule.
		204	Emission Reduction Credits	No - it is not a SIP approved rule.
		205	Community Bank and Priority Reserve Bank	No - it is not a SIP approved rule.
		206	Mobile and Transportation Source Emission Reduction Credits	No - it is not a SIP approved rule.
●	✱	207	Title V Federal Operating Permit Program	Yes - related conditions are included in the permit. (✱Although this is not a SIP approved rule it is applicable because it is part of the approved SMAQMD Title V Permit Program.)
●		208	Acid Rain	No - it is not a SIP approved rule. <i>Note: there is an equivalent federal regulation.</i>
		209	Limiting Potential to Emit	No - it is not a SIP approved rule.
		210	Synthetic Minor Source Status	No - it is not a SIP approved rule.

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Rule is Applicable	Rule is SIP Approved	Rule No.	Rule Title	Is the Rule an "Applicable Federally Enforceable Requirement"?
		211	MACT at Major Sources of Hazardous Air Pollutants	No - it is not a SIP approved rule.
		213	Federal Major Modifications	No - it is not a SIP approved rule.
		215	Agricultural Permit Requirements and New Agricultural Permit Review	No - it is not a SIP approved rule.
●	*	301	Stationary Source Permit Fees	Yes - related conditions are included in the permit. (*Although this is not a SIP approved rule it is applicable because it is part of the approved SMAQMD Title V Permit Program.)
●		302	Hearing Board Fees	No - it is not a SIP approved rule.
		303	Agricultural Burning Permit Fees	No - it is not a SIP approved rule.
		304	Plan Fees	No - it is not a SIP approved rule.
		305	Environmental Document Preparation and Processing Fees	No - it is not a SIP approved rule.
●		306	Air Toxics Fees	No - it is not a SIP approved rule.

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Rule is Applicable	Rule is SIP Approved	Rule No.	Rule Title	Is the Rule an "Applicable Federally Enforceable Requirement"?
●	●	307	Clean Air Act Fees 09-26-2002 version	Yes - related conditions are included in the permit.
		310	Permit Fees - Agricultural Source	No - it is not a SIP approved rule
●	●	401	Ringelmann Chart 04-05-1983 version	Yes - related conditions are included in the permit.
●		402	Nuisance	No - it is not a SIP approved rule.
●	●	403	Fugitive Dust 11-29-1983 version	Yes - related conditions are included in the permit.
●	●	404	Particulate Matter 11-20-1984 version	Yes - related conditions are included in the permit.
	●	405	Dust and Condensed Fumes 11-29-1983 version	No - the permittee does not operate such a process.
●	●	406	Specific Contaminants 11-29-1983 version	Yes - related conditions are included in the permit.

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Rule is Applicable	Rule is SIP Approved	Rule No.	Rule Title	Is the Rule an "Applicable Federally Enforceable Requirement"?
●	●	407	Open Burning 11-29-1983 version	Yes - no related conditions are included in the permit because the permittee does not conduct open burning.
	●	408	Incinerator Burning 11-29-1983 version	No - the permittee does not operate an incinerator.
	●	409	Orchard Heaters 11-29-1983 version	No - the permittee does not operate orchard heaters.
	●	410	Reduction of Animal Matter 11-29-1983 version	No - the permittee does not operate equipment for the reduction of animal matter.
	●	411	NOx from Boilers, Process Heaters and Steam Generators 10-27-2005 version	No - the permittee does not operate boilers.
	●	412	Stationary IC Engines at Major Stationary Sources of NOx 06-01-1995 version	No - the permittee does not operate IC engines.
	●	413	Stationary Gas Turbines 03-24-2005 version	No - the permittee does not operate gas turbines.

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 FOR SILGAN CAN COMPANY

Rule is Applicable	Rule is SIP Approved	Rule No.	Rule Title	Is the Rule an "Applicable Federally Enforceable Requirement"?
●	●	414	Natural Gas Fired Water Heaters 08-01-1996 version	Yes - related conditions are included in the permit.
		417	Wood Burning Appliances	No - it is not a SIP approved rule.
●	●	420	Sulfur Content of Fuels 11-29-1983 version	Yes - related conditions are included in the permit.
●	●	441	Organic Solvents 11-29-1983 version	Yes - no related conditions are included in the permit because of limited applicability.
●	●	442	Architectural Coatings 09-05-1996 version	Yes - related conditions are included in the permit.
	●	443	Leaks from Synthetic Organic Chemical and Polymer Manufacturing 09-05-1996 version	No - the permittee does not operate synthetic organic chemical or polymer manufacturing equipment.
	●	444	Petroleum Solvent Dry Cleaning 08-13-1981 version	No - the permittee does not operate petroleum solvent dry cleaning equipment.
	●	446	Storage of Petroleum Products 11-16-1993 version	No - the permittee does not store affected petroleum products.

SMAQMD RULES THAT ARE
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 FOR SILGAN CAN COMPANY

Rule is Applicable	Rule is SIP Approved	Rule No.	Rule Title	Is the Rule an "Applicable Federally Enforceable Requirement"?
	●	447	Organic Liquid Loading 04-02-1998 version	No - the permittee does not operate organic liquid loading equipment.
	●	448	Gasoline Transfer into Stationary Storage Containers 02-02-1995 version	No - the permittee does not operate such equipment.
	●	449	Transfer of Gasoline into Vehicle Fuel Tanks 09-26-2002 version	No - the permittee does not operate such equipment.
	●	450	Graphic Arts Operations 12-05-1996 version	No - the permittee does not operate a graphic arts process as defined in the rule.
●	●	451	Surface Coating of Miscellaneous Metal Parts and Products 11-29-1983 version	Yes - no related conditions are included in the permit because of limited applicability.
	●	452	Can Coating 09-05-1996 version	Yes - related conditions are included in the permit.
	●	453	Cutback and Emulsified Asphalt Paving Materials 11-29-1983 version	No - the permittee does not manufacture or apply cutback or emulsified asphalt paving materials.

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 FOR SILGAN CAN COMPANY

Rule is Applicable	Rule is SIP Approved	Rule No.	Rule Title	Is the Rule an "Applicable Federally Enforceable Requirement"?
●		454	Degreasing Operations 04-03-1997 version	No - the permittee does not operate degreasers subject to this rule.
●		455	Pharmaceuticals Manufacturing 11-29-1983 version	No - the permittee does not manufacture pharmaceuticals.
●		456	Aerospace Coating Operations 09-05-1996 version	No - the permittee does not coat aerospace parts.
		457	Methanol Compatible Tanks	No - it is not a SIP approved rule.
●		458	Large Commercial Bread Bakeries 09-05-1996 version	No - the permittee does not produce bread products.
●		459	Automotive, Truck and Heavy Equipment Refinishing Operations 10-02-1997 version	No - the permittee does not refinish vehicles.
●		460	Adhesives and Sealants	No - it is not a SIP approved rule.
		463	Wood Products Coatings	No - it is not a SIP approved rule.

SMAQMD RULES THAT ARE
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 FOR SILGAN CAN COMPANY

Rule is Applicable	Rule is SIP Approved	Rule No.	Rule Title	Is the Rule an "Applicable Federally Enforceable Requirement"?
	●	464	Organic Chemical Manufacturing Operations 07-23-1998 version	No - the permittee does not manufacture organic chemicals.
		465	Polyester Resin Operations	No - it is not a SIP approved rule.
	●	466	Solvent Cleaning	No - it is not a SIP approved rule.
		485	Municipal Landfill Gas	No - it is not a SIP approved rule.
		496	Large Confined Animal Facilities	No - it is not a SIP approved rule.
	●	501	Agricultural Burning 11-29-1983 version	No - the permittee does not conduct agricultural burning.
	●	601	Procedure before the Hearing Board	No - it is not a SIP approved rule.
	●	602	Breakdown Conditions: Emergency Variance	No - it is not a SIP approved rule.
	●	701	Emergency Episode Plan 05-27-1999 version	No - facility emissions are below applicability level.
	●	801	New Source Performance Standards	No - it is not a SIP approved rule. <i>Note: there are equivalent federal regulations.</i>

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Rule is Applicable	Rule is SIP Approved	Rule No.	Rule Title	Is the Rule an "Applicable Federally Enforceable Requirement"?
		901	General Requirements	No - it is not a SIP approved rule. <i>Note: there are equivalent federal regulations.</i>
		902	Asbestos	No - it is not a SIP approved rule. <i>Note: there is an equivalent federal regulation.</i>
		903	Mercury	No - it is not a SIP approved rule. <i>Note: there is an equivalent federal regulation.</i>
●		904	Airborne Toxic Control Measures	No - it is not a SIP approved rule. <i>Note: there are equivalent federal regulations for some of the listed ATCMs.</i>
		1002	Fleet Inventory	No - it is not a SIP approved rule.
		1003	Reduced-Emission Fleet Vehicles/Alternative Fuels	No - it is not a SIP approved rule.
		1005	Mobile Source Emission Reduction Credits/Banking	No - it is not a SIP approved rule.
		1006	Transportation Conformity	No - it is not a SIP approved rule.

Statement of Basis
Title V Federal Operating Permit 1st Administrative Amendment
Silgan Can Company
Title V Permit No. TV2005-15-01A

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SMAQMD RULES THAT ARE
"APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS"
FOR SILGAN CAN COMPANY

ATTACHMENT B

Categories of Title V Permit Modifications in SMAQMD Rule 207

Category of Title V Permit Modification:

The following are the categories of Title V permit modifications as defined in SMAQMD Rule 207. The category of the Title V permit modification is important because it dictates the public and U.S. EPA noticing requirements. For each of the proposed permit modifications that are discussed following this section, the Title V permit modification category will be specified.

Category: "Significant" Title V permit modification

SMAQMD Rule 207 Section 233 defines a Title V permit modification as a "Significant" Title V permit modification if any of the following conditions are met:

- 233.1 Involves any modification under Section 112(g) of Title I (42 U.S.C. Section 412(g) of the Federal Clean Air Act, or under EPA regulations promulgated pursuant to Title I of the Federal Clean Air Act, including 40 CFR Part 51, 52, 60, 61 and 63.
- 233.2 Involves relaxation or significant change to existing monitoring, reporting or recordkeeping requirements in the Title V permit.
- 233.3 Involves case-by-case determination of an emission limit or other standard.
- 233.4 Involves a stationary source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis.
- 233.5 Attempts to set or change a Title V permit term or condition which allows a source to avoid an applicable federal requirement including:
 - a. A federally enforceable emission cap pursuant to Title I of the Federal Clean Air Act, or
 - b. An alternative HAP emission limit pursuant to Section 112(i)(5) (Section 42 U.S.C. Section 7412(j)(5) of the Federal Clean Air Act.
- 233.6 Involves a modification to a major stationary source which results in an increase in the potential to emit greater than: 25 tons per year of nitrogen oxides, 25 tons per year of volatile organic compounds, 40 tons per year of sulfur dioxide, 100 tons per year of carbon monoxide, or 15 tons per year of PM10 when aggregated with all other increases in potential to emit over the period of five consecutive years before the application for modification, and including the calendar year of the most recent application.

Category: "Administrative" Title V permit modification

SMAQMD Rule 207 Section 202 defines a Title V permit modification as an "Administrative" Title V permit amendment if any of the following conditions are met:

- 202.1 Corrects typographical errors.
- 202.2 Identifies a change in the name, address, or phone number of any person identified in the permit, or provides a similar minor administrative change at the stationary source;

- 202.3 Requires more frequent monitoring or reporting by the responsible official of the stationary source.
- 202.4 Allows for change in ownership or operational control of a source where the Air Pollution Control Officer determines that no other change in the Title V permit is necessary, provided that a written agreement containing a specific date for transfer of Title V permit responsibility, coverage, and liability between the current and new responsible official has been submitted to the Air Pollution Control Officer.
- 202.5 Incorporates into the Title V permit the conditions of a preconstruction permit that is issued to an existing Title V stationary source through Rule 202, NEW SOURCE REVIEW and meeting the procedural requirements specified in Sections 401 through 408 of this Rule and the compliance requirements in Section 305 of this Rule.

Category: "Minor" Title V permit modification

SMAQMD Rule 207 Section 220 defines a Title V permit modification as an "Minor" Title V permit amendment if all of the following conditions are met:

- 220.1 Is not a significant Title V permit modification.
- 220.2 Is not an administrative Title V permit amendment.
- 220.3 Does not violate any applicable requirements which are federally enforceable.

ATTACHMENT C

Application for Title V Permit Modification

TITLE V PERMIT APPLICATION

STATIONARY SOURCE SUMMARY

I. FACILITY IDENTIFICATION

1. Facility Name: Silgan Can Company
2. Four digit SIC Code: 3411 EPA Plant ID: 99-15-02
3. Parent Company: Silgan Containers Mfg. Corp.
(if different from Facility name)
4. Mailing Address: 6200 Franklin Blvd., Suite #100, Sacramento, CA 95824-3412
5. Street Address or Source Location: SAME
6. Source located within 50 miles of the state line?: Yes No
7. Source located within 1000 feet of a school?: Yes No
8. Type of Organization: Corporation Sole Ownership Government
 Partnership Utility Company
9. Legal Owner's Name: Silgan Containers Mfg. Corp
10. Owner's Agent Name (if any): _____
11. Responsible Official: James Moses Telephone No.: 916-399-2594
Title: Plant Manager
12. Plant Site Manager/Contact: James Moses Telephone No.: 916-399-2594
Title: Plant Manager
13. Type of facility: Steel Food Can Manufacturing
14. General description of processes/products: Sanitary Steel Food Cans

15. Is a Federal Risk Management Plan required [pursuant to Section 112(r)]? Yes No
(If yes, attach verification that the Risk Management Plan is registered with appropriate agency.)

CERTIFICATION REPORT

I. FACILITY INFORMATION

1. Company Name: Silgan Containers Mfg. Corp.
2. Facility Name (if different than Company Name): Silgan Can Company
3. Mailing Address: 6200 Franklin Blvd., Suite #100, Sacramento, CA 95824-3412
4. Street Address or Source Location: SAME
5. Type of Organization: Corporation Sole Ownership
 Government Partnership
 Utility Company
6. Facility Permit Number: 99-15-02

II. GENERAL INFORMATION

1. Reporting period (specify dates): _____
2. Due date for submittal of report: _____
3. Type of submittal: **Monitoring Report** (complete Section III)
 Compliance Certification (complete Section IV)

III. MONITORING REPORT INFORMATION

1. Were deviations from monitoring requirements encountered during the reporting period?
 No Yes (If Yes, complete the **DEVIATION REPORT** form)

IV. COMPLIANCE CERTIFICATION

1. Was source in compliance during the reporting period specified in Section II of this Form and is source currently in compliance with all applicable federal requirements and permit conditions.

Yes No (If No, see Rule 207, Section 413.2)

I certify based on information and belief formed after reasonable inquiry, the statements and information in this document and supplements are true, accurate, and complete.

James B Moses
Signature of Responsible Official

26 Sept 07
Date

James Moses
Print Name of Responsible Official

Plant Manager
Title of Responsible Official and Company Name

Telephone Number of Responsible Official: (916) 399 - 2594