

FEB 25 2013

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-1123586**

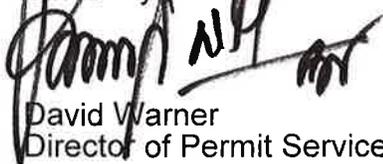
Dear Mr. Rios:

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-2174-8-12 into the Title V operating permit. The applicant is proposing to install a permanent total enclosure on an existing can sheet coating line.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued Authority to Construct N-2174-8-12, emission increases, 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

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

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

FEB 25 2013

Bob Bennett  
Silgan Containers MFG CORP  
4216 Kiernan Ave, Suite 101  
Modesto, CA 95356

**Re: Notice of Minor Title V Permit Modification  
District Facility # N-2174  
Project # N-1123586**

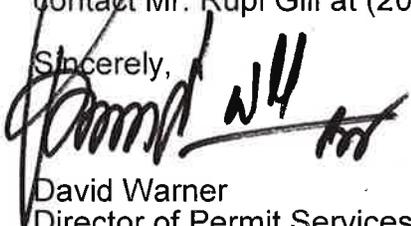
Dear Mr. Bennett:

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-2174-8-12 into the Title V operating permit. The applicant is proposing to install a permanent total enclosure on an existing can sheet coating line.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued Authority to Construct N-2174-8-12, emission increases, 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

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# **TITLE V APPLICATION REVIEW**

Minor Modification  
Project #: N-1123586

Engineer: James Harader  
Date: February 12, 2013

Facility Number: N-2174  
Facility Name: Silgan Containers MFG Corp  
Mailing Address: 6180 Roselle Ave.  
Riverbank, CA 95367

Contact Name: Bob Bennett  
Phone: (209) 491-7334

Responsible Official: Shawn Anderson  
Title: Plant Superintendent

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## **I. PROPOSAL**

Silgan Containers MFG Corp is proposing a Title V minor permit modification to incorporate Authority to Construct N-2174-8-12. This Authority to Construct is for the installation of a permanent total enclosure on sheet coating line #4 at Silgan's Riverbank plant. There was no emissions increase resulting from this project and this project did not trigger a federal major modification.

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 Rd in Riverbank, CA.

## **III. EQUIPMENT DESCRIPTION**

**N-2174-8-13:** SHEET COATING LINE (COATING LINE #4) WITH A PERMANENT TOTAL ENCLOSURE (PTE) AND AN AFTERBURNER EXHAUST GAS HEATED CURING TUNNEL, ALL SERVED BY A 9 MMBTU/HR NATURAL GAS FIRED SMITH ENGINEERING AFTERBURNER. THE COATING SYSTEM UTILIZED MAY BE EITHER A WAGNER TWO ROLLER AN D A

WAGNER SOLVENT FLOOD SYSTEM OR AN ANILOX SINGLE-ROLLER AND A HANESWOOD SOLVENTLESS SCRAPER SYSTEM

**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**

<b>Modified Conditions</b>			
<b>Previous TV PTO Condition #</b>	<b>ATC Condition #</b>	<b>New TV PTO Condition #</b>	<b>Proposed Changes to Conditions</b>
12	15	12	The current permit contains a condition that includes the Rule 4607 solvent cleaning VOC content limits prior to 10/1/2011. Since that date has passed, the condition was modified to only include the latest solvent cleaning VOC limits.
21	25	21	District Rule 4604 required the capture efficiency existing capture system to be tested once every year. This project replaces that existing capture system with a permanent total enclosure, for which District Rule 4604 only requires an initial test of the capture efficiency. Therefore, this condition has been modified to be consistent with District Rule 4604 requirements.
22	26	22	This condition states that the source testing for VOC capture and control efficiency must be conducted under normal and representative conditions. Since ongoing capture efficiency testing of a PTE is not required by District Rule 4604, this condition has been modified to only include control efficiency testing.
33	37	33	The existing permit includes a condition that requires the permittee to keep records of the rolling 12-month VOC emissions from this operation. The condition has been modified to clarify that the rolling 12-month records must be updated on at least a monthly basis.

**Removed Conditions**

Previous TV PTO Condition #	Proposed Changes to Conditions
	None

**Added Conditions**

ATC Condition #	New TV PTO Condition #	Proposed Changes to Conditions
		None

**ATC Conditions that were not Added**

ATC Condition #	Proposed Changes to Conditions
1	This condition requires the facility to submit an application to modify the TV permit in accordance with the timeframes and procedures of District Rule 2520. This requirement has not been included on the new permit.
2, 3, 45, and 46	These conditions already appear on the facility-wide permit. Therefore, they have not been included on the new permits.
24	This condition requires an initial test be performed to determine the capture efficiency of the PTE within 60 days of startup. This requirement will be satisfied prior to the issuance of the new Title V permit; thus, this requirement will not be included on the new TV permit.

**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.

## **VIII. ATTACHMENTS**

- A. Proposed Modified Title V Operating Permit
- B. Authority to Construct
- C. Previous Title V Permit
- D. Title V Compliance Certification Form

# ATTACHMENT A

Proposed Modified Title V Operating Permit

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-2174-8-13

**EXPIRATION DATE:** 09/30/2015

**EQUIPMENT DESCRIPTION:**

SHEET COATING LINE (COATING LINE #4) WITH A PERMANENT TOTAL ENCLOSURE (PTE) AND AN AFTERBURNER EXHAUST GAS HEATED CURING TUNNEL, ALL SERVED BY A 9 MMBTU/HR NATURAL GAS FIRED SMITH ENGINEERING AFTERBURNER. THE COATING SYSTEM UTILIZED MAY BE EITHER A WAGNER TWO ROLLER AND A WAGNER SOLVENT FLOOD SYSTEM OR AN ANILOX SINGLE-ROLLER AND A HANESWOOD SOLVENTLESS SCRAPER SYSTEM

## PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 gr/dscf in concentration at the point of discharge. [District Rule 4201] Federally Enforceable Through Title V Permit
2. This unit shall not be used for metal coil surface coating. [District Rule 2520, 9.1 and 40 CFR Part 60 Subpart TT] Federally Enforceable Through Title V Permit
3. This unit shall not be used in soft drink or beer (including malt liquor) can manufacturing operations. This prohibition does not apply to coating of containers in which fruit or vegetable juices are packaged. [District Rule 2520, 9.1 and 40 CFR Part 60 Subpart WW] Federally Enforceable Through Title V Permit
4. Sulfur compound emissions shall not exceed 0.2% by volume calculated as SO<sub>2</sub> averaged over 15 minutes. [District Rule 4801 and Stanislaus County Rule 407] Federally Enforceable Through Title V Permit
5. The afterburner shall be preheated to at least 1,400 degree F prior to start-up of the sheet coating line. [District Rule 4604, 5.2.2 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
6. The afterburner shall be equipped with a continuous temperature monitoring and recording instrument and be equipped with a device that shuts down the operation if the temperature of the afterburner is not maintained at a minimum operating temperature of 1,400 degree F. [District Rule 4604, 5.2.6 & 6.4, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
7. An excursion is deemed to occur when the afterburner temperature drops below the minimum operating temperature of 1,400 degree F. Upon detecting any excursion, the permittee shall investigate the excursion and take corrective action to minimize emissions and prevent recurrence of the excursion as expeditiously as practicable. Any record of an excursion shall be reported by sending a copy of such record to the APCO within 96 hours following the occurrence. Such report shall include an explanation of the cause of the excursion and the corrective action taken. [District Rule 4606, 6.4.2 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
8. VOC emissions from this operation shall be controlled by a VOC emission control device with a minimum overall control efficiency of 90% (by weight) and the VOC emission control system shall reduce VOC emissions, at all times, to a level which would have been achieved through the use of materials compliant with the applicable requirements of Rule 4604, Sections 5.1 and 5.4 (9/20/07). [District Rule 4604, 5.2.2 & 5.2.3] Federally Enforceable Through Title V Permit
9. VOC emissions due to the application of sheet coatings and clean-up solvents shall not exceed 892.7 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The annual VOC emissions shall not exceed 40,500 pounds based on a 12 month rolling total. [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.

11. Emissions due to the natural gas fired afterburner shall not exceed any of the following: 0.00285 lb-SO<sub>x</sub>/MMBtu, 0.1 lb-NO<sub>x</sub>/MMBtu, 0.084 lb-CO/MMBtu, 0.0055 lb-VOC/MMBtu, and 0.0076 lb-PM<sub>10</sub>/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
12. 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): (a). Product cleaning during manufacturing process or surface preparation for coating application: 25 g/l (0.21 lb/gal); (b). Repair and maintenance cleaning: 25 g/l (0.21 lb/gal); (c). Cleaning of sheet coater for three-piece cans: 250 g/l (2.3 lb/gal). [District Rule 4604, 5.4.1]
13. Cleaning activities that use 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. An operator cleaning coating application equipment that is not spray application equipment may use an alternative cleaning method other than those listed above if the alternative cleaning method is approved by the District and Environmental Protection Agency (EPA). [District Rule 4604, 5.4.4 & 5.4.7] Federally Enforceable Through Title V Permit
14. 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
15. Permittee shall not use materials with a VOC content greater than 25 g/l (0.21 lb/gal) 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
16. 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, 5.5] Federally Enforceable Through Title V Permit
17. A person shall not apply any coating except by the use of one or more of the following methods: electrostatic, flow, roll, dip, hand application, HVLP spray, or any other coating method that demonstrates, to the satisfaction of the APCO and the EPA, a coating transfer efficiency of at least 65% as measured using a test method pursuant to Section 6.7.4 of Rule 4604 (9/20/07). All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4604, 5.6.2 & 6.7.4] Federally Enforceable Through Title V Permit
18. Operator shall maintain and have available during inspections, a current list of the coatings in use. The list shall include 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; 4) VOC content of each catalyst and thinner in g/l or lb/gal. [District Rule 4604, 6.2.1] Federally Enforceable Through Title V Permit
19. Operator shall maintain and have available during inspections, a current list of solvents in use that provides all data necessary to evaluate compliance including the following information as applicable: 1) The name of the cleaning solvent and its manufacturer's name; 2) VOC content of the solvent in g/l or lb/gal. [District Rule 4604, 6.3.1] 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.

20. Permittee shall submit a VOC emission control system Operation and Maintenance (O/M) plan to the APCO, and shall submit a new or modified VOC emission control system O/M plan prior to implementation of an Authority to Construct for a new or modified VOC emission control system. The VOC emission control system O/M plan shall satisfy Section 6.5 of Rule 4604 (9/20/07). [District Rule 4604, 5.2.7 & 6.5] Federally Enforceable Through Title V Permit
21. The operator shall source test the afterburner to determine the control efficiency of the afterburner at least once every twelve (12) months. [District Rules 1081 and 4604, 5.2.8.3.1]
22. Source testing for VOC control efficiency of the connected afterburner shall be performed under conditions representative of normal operating conditions using non-compliant coating (if applicable) and under conditions specified in the Permit-To-Operate. [District Rule 4604, 5.2.8.3.2] Federally Enforceable Through Title V Permit
23. 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
24. 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
25. The capture efficiency of the VOC emission control system's collection device 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 District. [District Rules 1081 and 4604, 6.7.2.1] Federally Enforceable Through Title V Permit
26. The control efficiency of the VOC emission control system's afterburner shall be determined using EPA Method 2, 2A, or 2D for measuring flow rates and EPA Methods 25, 25A, or 25B for measuring total gaseous organic concentrations at inlet and outlet of the afterburner. EPA Method 18 or ARB Method 422 shall be used to determine the emissions of exempt compounds. [District Rules 1081 and 4604, 6.7.2.2] Federally Enforceable Through Title V Permit
27. The overall VOC capture and control efficiency shall be determined utilizing the latest source test results and the following equation:  $CE (Capture\ and\ Control) = [CE (Capture) \times CE (Control)] / 100$ . Where: CE (Capture and Control) is the overall capture and control efficiency (in percent); CE (Capture) is the capture efficiency of the collection device (in percent); CE (Control) is the control efficiency of the afterburner (in percent). [District Rule 4604, 6.7.2.3] Federally Enforceable Through Title V Permit
28. When required, the 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) or by using the manufacturer's product formulation data and the formula for "Grams of VOC per liter of Material" as defined 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] Federally Enforceable Through Title V Permit
29. When required, 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 defined 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] Federally Enforceable Through Title V Permit
30. Records shall be maintained on a daily basis and shall include the following coating information: 1) Specific coating used and the mix ratio of components added to the coating material prior to application; 2) Volume of coatings applied (gallons); 3) Specific solvents, catalysts, and thinners used; 4) Volume of each solvent, catalyst, and thinner (gallons) used. [District Rule 4604, 6.2.2. and 6.2.3] 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.

31. Records shall be maintained on a daily basis and shall include the following solvent 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; 3) Volume of each cleaning solvent used (gallons); 4) The type of cleaning activity for each solvent. [District Rule 4604, 6.3.2 and 6.3.3] Federally Enforceable Through Title V Permit
32. Permittee shall maintain daily records of key system operating parameters which will demonstrate continuous operation and compliance of the emission control system during periods of emission-producing activities. [District Rule 4604, 6.4.1] Federally Enforceable Through Title V Permit
33. Permittee shall keep a record of the rolling 12-month VOC emissions from this operation. This record shall be updated on at least a monthly basis. [District Rule 1070]
34. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR Part 64.7. [40 CFR Part 64.7] Federally Enforceable Through Title V Permit
35. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR Part 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64.8. [40 CFR Part 64.8] Federally Enforceable Through Title V Permit
36. The permittee shall comply with the record keeping and reporting requirements of 40 CFR Part 64.9. [40 CFR Part 64.9] Federally Enforceable Through Title V Permit
37. 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 Rules 1070, 2520, 9.4.2, and 4604, 6.2.5, 6.3.5, & 6.4.3] Federally Enforceable Through Title V Permit
38. Compliance with permit conditions in the Title V permit shall be deemed compliance with the requirements of SJVAPCD Rules 4201 (as amended December 17, 1992) for curing oven emissions only and 4604 (as amended September 20, 2007). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
39. The requirements of SJVAPCD Rule 4661 (as amended September 20, 2007) , does not apply to this permit unit because it is subject to District Rule 4604 (as amended September 20, 2007). A permit shield is granted from these requirements. [District Rules 2520, 13.2] Federally Enforceable Through Title V Permit
40. The requirements of 40 CFR Part 60 Subparts TT and WW do not apply to this permit unit because this unit does not coat beverage cans or metal coils. A permit shield is granted from these requirements. [District Rule 2520, 13.2] 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



## AUTHORITY TO CONSTRUCT

**PERMIT NO:** N-2174-8-12

**ISSUANCE DATE:** 09/18/2012

**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 SHEET COATING LINE (COATING LINE #4) WITH AN AFTERBURNER EXHAUST GAS HEATED CURING TUNNEL, SERVED BY A 9 MMBTU/HR NATURAL GAS FIRED SMITH ENGINEERING AFTERBURNER. THE COATING SYSTEM UTILIZED MAY BE EITHER A WAGNER TWO ROLLER AND A WAGNER SOLVENT FLOOD SYSTEM OR AN ANILOX SINGLE-ROLLER AND A HANESWOOD SOLVENTLESS SCRAPER SYSTEM: TO REPLACE THE EXISTING SHEET COATER CAPTURE SYSTEM WITH A PERMANENT TOTAL ENCLOSURE

### 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 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 Stanislaus County Rule 401] Federally Enforceable Through Title V Permit
3. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. Particulate matter emissions shall not exceed 0.1 gr/dscf in concentration at the point of discharge. [District Rule 4201] Federally Enforceable Through Title V Permit
5. This unit shall not be used for metal coil surface coating. [District Rule 2520, 9.1 and 40 CFR Part 60 Subpart TT] Federally Enforceable Through Title V Permit

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 / APCQ



DAVID WARNER, Director of Permit Services

N-2174-8-12 : Sep 18 2012 8:48AM - HARADERJ : Joint Inspection NOT Required

6. This unit shall not be used in soft drink or beer (including malt liquor) can manufacturing operations. This prohibition does not apply to coating of containers in which fruit or vegetable juices are packaged. [District Rule 2520, 9.1 and 40 CFR Part 60 Subpart WW] Federally Enforceable Through Title V Permit
7. Sulfur compound emissions shall not exceed 0.2% by volume calculated as SO<sub>2</sub> averaged over 15 minutes. [District Rule 4801 and Stanislaus County Rule 407] Federally Enforceable Through Title V Permit
8. The afterburner shall be preheated to at least 1,400 degree F prior to start-up of the sheet coating line. [District Rule 4604, 5.2.2 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
9. The afterburner shall be equipped with a continuous temperature monitoring and recording instrument and be equipped with a device that shuts down the operation if the temperature of the afterburner is not maintained at a minimum operating temperature of 1,400 degree F. [District Rule 4604, 5.2.6 & 6.4, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
10. An excursion is deemed to occur when the afterburner temperature drops below the minimum operating temperature of 1,400 degree F. Upon detecting any excursion, the permittee shall investigate the excursion and take corrective action to minimize emissions and prevent recurrence of the excursion as expeditiously as practicable. Any record of an excursion shall be reported by sending a copy of such record to the APCO within 96 hours following the occurrence. Such report shall include an explanation of the cause of the excursion and the corrective action taken. [District Rule 4606, 6.4.2 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
11. VOC emissions from this operation shall be controlled by a VOC emission control device with a minimum overall control efficiency of 90% (by weight) and the VOC emission control system shall reduce VOC emissions, at all times, to a level which would have been achieved through the use of materials compliant with the applicable requirements of Rule 4604, Sections 5.1 and 5.4 (9/20/07). [District Rule 4604, 5.2.2 & 5.2.3] Federally Enforceable Through Title V Permit
12. VOC emissions due to the application of sheet coatings and clean-up solvents shall not exceed 892.7 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The annual VOC emissions shall not exceed 40,500 pounds based on a 12 month rolling total. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Emissions due to the natural gas fired afterburner shall not exceed any of the following: 0.00285 lb-SO<sub>x</sub>/MMBtu, 0.1 lb-NO<sub>x</sub>/MMBtu, 0.084 lb-CO/MMBtu, 0.0055 lb-VOC/MMBtu, and 0.0076 lb-PM<sub>10</sub>/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
15. " 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): (a). Product cleaning during manufacturing process or surface preparation for coating application: 25 g/l (0.21 lb/gal); (b). Repair and maintenance cleaning: 25 g/l (0.21 lb/gal); (c). Cleaning of sheet coater for three-piece cans: 250 g/l (2.3 lb/gal). [District Rule 4604, 5.4.1]
16. Cleaning activities that use 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. An operator cleaning coating application equipment that is not spray application equipment may use an alternative cleaning method other than those listed above if the alternative cleaning method is approved by the District and Environmental Protection Agency (EPA). [District Rule 4604, 5.4.4 & 5.4.7] Federally Enforceable Through Title V Permit
17. 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

CONDITIONS CONTINUE ON NEXT PAGE

18. Permittee shall not use materials with a VOC content greater than 25 g/l (0.21 lb/gal) 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
19. 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, 5.5] Federally Enforceable Through Title V Permit
20. A person shall not apply any coating except by the use of one or more of the following methods: electrostatic, flow, roll, dip, hand application, HVLP spray, or any other coating method that demonstrates, to the satisfaction of the APCO and the EPA, a coating transfer efficiency of at least 65% as measured using a test method pursuant to Section 6.7.4 of Rule 4604 (9/20/07). All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4604, 5.6.2 & 6.7.4] Federally Enforceable Through Title V Permit
21. Operator shall maintain and have available during inspections, a current list of the coatings in use. The list shall include 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; 4) VOC content of each catalyst and thinner in g/l or lb/gal. [District Rule 4604, 6.2.1] Federally Enforceable Through Title V Permit
22. Operator shall maintain and have available during inspections, a current list of solvents in use that provides all data necessary to evaluate compliance including the following information as applicable: 1) The name of the cleaning solvent and its manufacturer's name; 2) VOC content of the solvent in g/l or lb/gal. [District Rule 4604, 6.3.1] Federally Enforceable Through Title V Permit
23. Permittee shall submit a VOC emission control system Operation and Maintenance (O/M) plan to the APCO, and shall submit a new or modified VOC emission control system O/M plan prior to implementation of an Authority to Construct for a new or modified VOC emission control system. The VOC emission control system O/M plan shall satisfy Section 6.5 of Rule 4604 (9/20/07). [District Rule 4604, 5.2.7 & 6.5] Federally Enforceable Through Title V Permit
24. Within 60 days of startup, permittee shall perform an initial test to determine the capture efficiency of the permanent total enclosure that serves the sheet coater. [District Rule 4604, 5.2.8.1.1]
25. The operator shall source test the afterburner to determine the control efficiency of the afterburner at least once every twelve (12) months. [District Rules 1081 and 4604, 5.2.8.3.1]
26. Source testing for VOC control efficiency of the connected afterburner shall be performed under conditions representative of normal operating conditions using non-compliant coating (if applicable) and under conditions specified in the Permit-To-Operate. [District Rule 4604, 5.2.8.3.2] Federally Enforceable Through Title V Permit
27. 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
28. 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
29. The capture efficiency of the VOC emission control system's collection device 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 District. [District Rules 1081 and 4604, 6.7.2.1] Federally Enforceable Through Title V Permit
30. The control efficiency of the VOC emission control system's afterburner shall be determined using EPA Method 2, 2A, or 2D for measuring flow rates and EPA Methods 25, 25A, or 25B for measuring total gaseous organic concentrations at inlet and outlet of the afterburner. EPA Method 18 or ARB Method 422 shall be used to determine the emissions of exempt compounds. [District Rules 1081 and 4604, 6.7.2.2] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

31. The overall VOC capture and control efficiency shall be determined utilizing the latest source test results and the following equation:  $CE \text{ (Capture and Control)} = [CE \text{ (Capture)} \times CE \text{ (Control)}] / 100$ . Where: CE (Capture and Control) is the overall capture and control efficiency (in percent); CE (Capture) is the capture efficiency of the collection device (in percent); CE (Control) is the control efficiency of the afterburner (in percent). [District Rule 4604, 6.7.2.3] Federally Enforceable Through Title V Permit
32. When required, the 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) or by using the manufacturer's product formulation data and the formula for "Grams of VOC per liter of Material" as defined 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] Federally Enforceable Through Title V Permit
33. When required, 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 defined 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] Federally Enforceable Through Title V Permit
34. Records shall be maintained on a daily basis and shall include the following coating information: 1) Specific coating used and the mix ratio of components added to the coating material prior to application; 2) Volume of coatings applied (gallons); 3) Specific solvents, catalysts, and thinners used; 4) Volume of each solvent, catalyst, and thinner (gallons) used. [District Rule 4604, 6.2.2. and 6.2.3] Federally Enforceable Through Title V Permit
35. Records shall be maintained on a daily basis and shall include the following solvent 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; 3) Volume of each cleaning solvent used (gallons); 4) The type of cleaning activity for each solvent. [District Rule 4604, 6.3.2 and 6.3.3] Federally Enforceable Through Title V Permit
36. Permittee shall maintain daily records of key system operating parameters which will demonstrate continuous operation and compliance of the emission control system during periods of emission-producing activities. [District Rule 4604, 6.4.1] Federally Enforceable Through Title V Permit
37. Permittee shall keep a record of the rolling 12-month VOC emissions from this operation. This record shall be updated on at least a monthly basis. [District Rule 1070]
38. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR Part 64.7. [40 CFR Part 64.7] Federally Enforceable Through Title V Permit
39. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR Part 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64.8. [40 CFR Part 64.8] Federally Enforceable Through Title V Permit
40. The permittee shall comply with the record keeping and reporting requirements of 40 CFR Part 64.9. [40 CFR Part 64.9] Federally Enforceable Through Title V Permit
41. 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 Rules 1070, 2520, 9.4.2, and 4604, 6.2.5, 6.3.5, & 6.4.3] Federally Enforceable Through Title V Permit
42. Compliance with permit conditions in the Title V permit shall be deemed compliance with the requirements of SJVAPCD Rules 4201 (as amended December 17, 1992) for curing oven emissions only and 4604 (as amended September 20, 2007). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

43. The requirements of SJVAPCD Rule 4661 (as amended September 20, 2007) , does not apply to this permit unit because it is subject to District Rule 4604 (as amended September 20, 2007). A permit shield is granted from these requirements. [District Rules 2520, 13.2] Federally Enforceable Through Title V Permit
44. The requirements of 40 CFR Part 60 Subparts TT and WW do not apply to this permit unit because this unit does not coat beverage cans or metal coils. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
45. Total stationary source (as defined in 40 CFR 63.2) emissions shall not exceed 10 tons in any consecutive 12 month period of any hazardous air pollutant (HAP) (as defined in 40 CFR 63.2) and 25 tons in any consecutive 12 month period of any combination of HAPs. [District Rule 2201] Federally Enforceable Through Title V Permit
46. 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 unit sufficient to determine HAP emissions. [District Rules 2201 and 1070] Federally Enforceable Through Title V Permit

# ATTACHMENT C

Previous Title V Permit

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-2174-8-11

**EXPIRATION DATE:** 09/30/2015

**EQUIPMENT DESCRIPTION:**

SHEET COATING LINE (COATING LINE #4) WITH AN AFTERBURNER EXHAUST GAS HEATED CURING TUNNEL, SERVED BY A 9 MMBTU/HR NATURAL GAS FIRED SMITH ENGINEERING AFTERBURNER. THE COATING SYSTEM UTILIZED MAY BE EITHER A WAGNER TWO ROLLER AND A WAGNER SOLVENT FLOOD SYSTEM OR AN ANILOX SINGLE-ROLLER AND A HANESWOOD SOLVENTLESS SCRAPER SYSTEM

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed 0.1 gr/dscf in concentration at the point of discharge. [District Rule 4201] Federally Enforceable Through Title V Permit
2. This unit shall not be used for metal coil surface coating. [District Rule 2520, 9.1 and 40 CFR Part 60 Subpart TT] Federally Enforceable Through Title V Permit
3. This unit shall not be used in soft drink or beer (including malt liquor) can manufacturing operations. This prohibition does not apply to coating of containers in which fruit or vegetable juices are packaged. [District Rule 2520, 9.1 and 40 CFR Part 60 Subpart WW] Federally Enforceable Through Title V Permit
4. Sulfur compound emissions shall not exceed 0.2% by volume calculated as SO<sub>2</sub> averaged over 15 minutes. [District Rule 4801 and Stanislaus County Rule 407] Federally Enforceable Through Title V Permit
5. The afterburner shall be preheated to at least 1,400 degree F prior to start-up of the sheet coating line. [District Rule 4604, 5.2.2 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
6. The afterburner shall be equipped with a continuous temperature monitoring and recording instrument and be equipped with a device that shuts down the operation if the temperature of the afterburner is not maintained at a minimum operating temperature of 1,400 degree F. [District Rule 4604, 5.2.6 & 6.4, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
7. An excursion is deemed to occur when the afterburner temperature drops below the minimum operating temperature of 1,400 degree F. Upon detecting any excursion, the permittee shall investigate the excursion and take corrective action to minimize emissions and prevent recurrence of the excursion as expeditiously as practicable. Any record of an excursion shall be reported by sending a copy of such record to the APCO within 96 hours following the occurrence. Such report shall include an explanation of the cause of the excursion and the corrective action taken. [District Rule 4606, 6.4.2 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
8. VOC emissions from this operation shall be controlled by a VOC emission control device with a minimum overall control efficiency of 90% (by weight) and the VOC emission control system shall reduce VOC emissions, at all times, to a level which would have been achieved through the use of materials compliant with the applicable requirements of Rule 4604, Sections 5.1 and 5.4 (9/20/07). [District Rule 4604, 5.2.2 & 5.2.3] Federally Enforceable Through Title V Permit
9. VOC emissions due to the application of sheet coatings and clean-up solvents shall not exceed 892.7 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The annual VOC emissions shall not exceed 40,500 pounds based on a 12 month rolling total. [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.

11. Emissions due to the natural gas fired afterburner shall not exceed any of the following: 0.00285 lb-SOx/MMBtu, 0.1 lb-NOx/MMBtu, 0.084 lb-CO/MMBtu, 0.0055 lb-VOC/MMBtu, and 0.0076 lb-PM10/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
12. 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): (a). Product cleaning during manufacturing process or surface preparation for coating application: 25 g/l (0.21 lb/gal); (b). Repair and maintenance cleaning: 25 g/l (0.21 lb/gal); (c). 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, 5.4.3] Federally Enforceable Through Title V Permit
13. Cleaning activities that use 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. An operator cleaning coating application equipment that is not spray application equipment may use an alternative cleaning method other than those listed above if the alternative cleaning method is approved by the District and Environmental Protection Agency (EPA). [District Rule 4604, 5.4.4 & 5.4.7] Federally Enforceable Through Title V Permit
14. 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
15. Permittee shall not use materials with a VOC content greater than 25 g/l (0.21 lb/gal) 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
16. 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, 5.5] Federally Enforceable Through Title V Permit
17. A person shall not apply any coating except by the use of one or more of the following methods: electrostatic, flow, roll, dip, hand application, HVLP spray, or any other coating method that demonstrates, to the satisfaction of the APCO and the EPA, a coating transfer efficiency of at least 65% as measured using a test method pursuant to Section 6.7.4 of Rule 4604 (9/20/07). All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4604, 5.6.2 & 6.7.4] Federally Enforceable Through Title V Permit
18. Operator shall maintain and have available during inspections, a current list of the coatings in use. The list shall include 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; 4) VOC content of each catalyst and thinner in g/l or lb/gal. [District Rule 4604, 6.2.1] Federally Enforceable Through Title V Permit
19. Operator shall maintain and have available during inspections, a current list of solvents in use that provides all data necessary to evaluate compliance including the following information as applicable: 1) The name of the cleaning solvent and its manufacturer's name; 2) VOC content of the solvent in g/l or lb/gal. [District Rule 4604, 6.3.1] 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.

20. Permittee shall submit a VOC emission control system Operation and Maintenance (O/M) plan to the APCO, and shall submit a new or modified VOC emission control system O/M plan prior to implementation of an Authority to Construct for a new or modified VOC emission control system. The VOC emission control system O/M plan shall satisfy Section 6.5 of Rule 4604 (9/20/07). [District Rule 4604, 5.2.7 & 6.5] Federally Enforceable Through Title V Permit
21. The operator shall source test the VOC emission collection device and the connected afterburner to determine the capture efficiency of the collection device and control efficiency of the afterburner at least once every twelve (12) months. Source testing of the VOC emission collection device and the connected afterburner shall be performed within 24 hours of each source test. [District Rules 1081 and 4604, 5.2.8.2.1 & 5.2.8.3.1] Federally Enforceable Through Title V Permit
22. Source testing for VOC capture and control efficiency of the VOC emission collection device and connected afterburner shall be performed under conditions representative of normal operating conditions using non-compliant coating (if applicable) and under conditions specified in the Permit-To-Operate. [District Rule 4604, 5.2.8.2.2 & 5.2.8.3.2] Federally Enforceable Through Title V Permit
23. 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
24. 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
25. The capture efficiency of the VOC emission control system's collection device 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 District. [District Rules 1081 and 4604, 6.7.2.1] Federally Enforceable Through Title V Permit
26. The control efficiency of the VOC emission control system's afterburner shall be determined using EPA Method 2, 2A, or 2D for measuring flow rates and EPA Methods 25, 25A, or 25B for measuring total gaseous organic concentrations at inlet and outlet of the afterburner. EPA Method 18 or ARB Method 422 shall be used to determine the emissions of exempt compounds. [District Rules 1081 and 4604, 6.7.2.2] Federally Enforceable Through Title V Permit
27. The overall VOC capture and control efficiency shall be determined utilizing the latest source test results and the following equation:  $CE \text{ (Capture and Control)} = [CE \text{ (Capture)} \times CE \text{ (Control)}] / 100$ . Where: CE (Capture and Control) is the overall capture and control efficiency (in percent); CE (Capture) is the capture efficiency of the collection device (in percent); CE (Control) is the control efficiency of the afterburner (in percent). [District Rule 4604, 6.7.2.3] Federally Enforceable Through Title V Permit
28. When required, the 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) or by using the manufacturer's product formulation data and the formula for "Grams of VOC per liter of Material" as defined 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] Federally Enforceable Through Title V Permit
29. When required, 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 defined 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] 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.

30. Records shall be maintained on a daily basis and shall include the following coating information: 1) Specific coating used and the mix ratio of components added to the coating material prior to application; 2) Volume of coatings applied (gallons); 3) Specific solvents, catalysts, and thinners used; 4) Volume of each solvent, catalyst, and thinner (gallons) used. [District Rule 4604, 6.2.2. and 6.2.3] Federally Enforceable Through Title V Permit
31. Records shall be maintained on a daily basis and shall include the following solvent 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; 3) Volume of each cleaning solvent used (gallons); 4) The type of cleaning activity for each solvent. [District Rule 4604, 6.3.2 and 6.3.3] Federally Enforceable Through Title V Permit
32. Permittee shall maintain daily records of key system operating parameters which will demonstrate continuous operation and compliance of the emission control system during periods of emission-producing activities. [District Rule 4604, 6.4.1] Federally Enforceable Through Title V Permit
33. Records of the annual VOC emissions on a 12 month rolling total shall be kept. [District Rule 1070] Federally Enforceable Through Title V Permit
34. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR Part 64.7. [40 CFR Part 64.7] Federally Enforceable Through Title V Permit
35. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR Part 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64.8. [40 CFR Part 64.8] Federally Enforceable Through Title V Permit
36. The permittee shall comply with the record keeping and reporting requirements of 40 CFR Part 64.9. [40 CFR Part 64.9] Federally Enforceable Through Title V Permit
37. 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 Rules 1070, 2520, 9.4.2, and 4604, 6.2.5, 6.3.5, & 6.4.3] Federally Enforceable Through Title V Permit
38. Compliance with permit conditions in the Title V permit shall be deemed compliance with the requirements of SJVAPCD Rules 4201 (as amended December 17, 1992) for curing oven emissions only and 4604 (as amended September 20, 2007). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
39. The requirements of SJVAPCD Rule 4661 (as amended September 20, 2007) , does not apply to this permit unit because it is subject to District Rule 4604 (as amended September 20, 2007). A permit shield is granted from these requirements. [District Rules 2520, 13.2] Federally Enforceable Through Title V Permit
40. The requirements of 40 CFR Part 60 Subparts TT and WW do not apply to this permit unit because this unit does not coat beverage cans or metal coils. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

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

# ATTACHMENT D

Title V Compliance Certification Form

**San Joaquin Valley  
Unified Air Pollution Control District**

**TITLE V COMPLIANCE CERTIFICATION FORM**

**I. TYPE OF PERMIT ACTION (Check appropriate box)**

- INITIAL TITLE V PERMIT       SIGNIFICANT PERMIT MODIFICATION       ADMINISTRATIVE AMENDMENT  
 PERMIT RENEWAL       MINOR PERMIT MODIFICATION

COMPANY NAME: <b>SILGAN CONTAINERS MFG. CORP.</b>	FACILITY ID: <b>N - 2174</b>
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: <b>SILGAN CONTAINERS MFG. CORP.</b>	
3. Agent to the Owner:	
4. Compliance Certifications will be submitted on: year 1. ___/___/___   year 2. ___/___/___   year 3. ___/___/___   year 4. ___/___/___   year 5. ___/___/___ Other dates <u>if required by regulations or compliance schedule</u> :	

**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.  
  
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:

Shawn Anderson  
Signature of Responsible Official

July 12, 2012  
Date

**Shawn Anderson**

Name of Responsible Official (please print)

**PLANT SUPERINTENDENT**

Title of Responsible Official (please print)