

TITLE V APPLICATION REVIEW

Minor Modification
Project #: N-1113733

Engineer: James Harader
Date: December 27, 2011

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: Gary Miller
Title: Plant Manager

I. PROPOSAL

Silgan Containers MFG Corp is proposing a Title V minor permit modification to incorporate Authorities to Construct N-2174-32-0 and N-2174-33-0 into their existing Title V operating permit. These Authorities to Construct were issued for the replacement of two existing tanks, N-2174-24 and N-2174-31. The replacement tanks will be connected to a shared carbon absorption system. 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-2174-32-1: ONE 4,000 GALLON FIXED ROOF STORAGE TANK FOR WASTE COATINGS AND SOLVENTS WITH ALL TANK VAPORS CONTROLLED BY A SHARED CARBON ABSORPTION SYSTEM WITH TWO 200 LB US FILTER MODEL VSC200 FILTERS IN SERIES (SHARED WITH N-2174-33)

N-2174-33-1: ONE 2,000 GALLON FIXED ROOF STORAGE TANK FOR WASTE COATINGS AND SOLVENTS WITH ALL TANK VAPORS CONTROLLED BY A SHARED CARBON ABSORPTION SYSTEM WITH TWO 200 LB US FILTER MODEL VSC200 FILTERS IN SERIES (SHARED WITH N-2174-32)

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

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

Removed Conditions	
Previous TV PTO Condition #	Proposed Changes to Conditions
None	

Added Conditions		
ATC Condition #	New TV PTO Condition #	Proposed Changes to Conditions
Since these are new permits, all the conditions are new.		

ATC Conditions that were not Added	
ATC Condition #	Proposed Changes to Conditions
1	For each permit, 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	Condition #2 of ATC N-2174-32-0 requires PTO N-2174-24 to be cancelled prior to implementation. Condition #2 of ATC N-2174-33-0 requires PTO N-2174-31 to be cancelled prior to implantation. These conditions will be satisfied prior to startup; thus, the conditions will not be retained on the Permit to Operate.
3,4	These conditions already appear on the facility-wide permit. Therefore, they have not been included on the new permits.

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 Permits
- B. Authorities to Construct
- C. Title V Compliance Certification Form

ATTACHMENT A

Proposed Modified Title V Operating Permits

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-2174-32-1

EXPIRATION DATE: 09/30/2015

EQUIPMENT DESCRIPTION:

ONE 4,000 GALLON FIXED ROOF STORAGE TANK FOR WASTE COATINGS AND SOLVENTS WITH ALL TANK VAPORS CONTROLLED BY A SHARED CARBON ABSORPTION SYSTEM WITH TWO 200 LB US FILTER MODEL VSC200 FILTERS IN SERIES (SHARED WITH N-2174-33)

PERMIT UNIT REQUIREMENTS

1. This tank shall be maintained in a leak-free condition. A leak-free condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit and Rule 4623 (amended 5/19/05). [District Rule 4623, 3.11, 5.1.3, & 6.4.8] Federally Enforceable Through Title V Permit
2. The storage tank shall be equipped with a pressure-vacuum (PV) relief valve shall be set to within 10% of the maximum allowable working pressure of the tank, permanently labeled with the operating pressure settings, properly maintained in good operating order in accordance with the manufacturer's instructions, and shall remain in leak-free condition except when the operating pressure exceeds the valve's set pressure. [District Rules 2201 and 4623, 5.1 & 5.2] Federally Enforceable Through Title V Permit
3. Only waste coatings and solvents shall be stored in this tank. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The VOC control efficiency of the carbon absorption system shall be 90% or greater. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The maximum throughput shall not exceed 4,000 gallons in any one day and 28,000 gallons in any one calendar year. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The true vapor pressure (TVP) of the organic liquid stored in the tank shall be less than 11 psia at the actual storage temperature of the tank contents. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The operator shall conduct true vapor pressure (TVP) testing of the organic liquid stored in the tank at least once per year in accordance with the methods described in Section 6.4 of District Rule 4623 (amended 5/19/05). Determinations shall be made annually during the summer (July - September) and whenever there is a change in the source or type of the organic liquid stored in the tank. [District Rules 2201, 2520, 9.3.2, and 4623, 6.2.2] Federally Enforceable Through Title V Permit
8. The TVP testing shall be conducted at actual storage temperature of the organic liquid in the tank. [District Rules 2201 and 4623, 6.2.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

9. For organic liquids, the true vapor pressure (TVP) shall be measured using Reid vapor pressure (RVP) ASTM Method D 323-94 (Test Methods for Vapor Pressure for Petroleum Products), and converting the RVP to TVP at the tank's maximum organic liquid storage temperature. The conversion of RVP to TVP shall be done in accordance with the procedures in Appendix B of District Rule 4623 (Amended 5/19/05). Appendix B is an excerpt from the oil and gas section of "California Air Resources Boards (ARB) Technical Guidance Document to the Criteria and Guidelines Regulations for AB 2588", dated August 1989. Alternate methods of determining the true vapor pressure may be utilized if prior approval is obtained from the District and EPA. [District Rules 2201 and 4623, 6.4.3] Federally Enforceable Through Title V Permit
10. The operator shall keep and shall submit records of TVP testing to the APCO within 45 days after the date of testing. The records shall include the tank identification number, Permit to Operate number, type of stored organic liquid, TVP of the stored organic liquid, test methods used, ambient temperature at the time the test was conducted, and a copy of the test results. [District Rules 2201 and 4623, 6.3.1 & 6.3.6] Federally Enforceable Through Title V Permit
11. The operator shall perform monthly monitoring of all components associated with the waste solvent tank system using a photo ionization detector (or equivalent). The monitoring shall be conducted in accordance with EPA Method 21 and shall include the sampling point between the primary and back-up carbon canisters. The primary canister shall be replaced when measurable levels of VOC emissions are detected at the sampling point between the primary and back-up carbon canisters. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The carbon canisters removed from the system shall be sealed vapor tight. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Records shall be maintained of all maintenance activities for the carbon canister system. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The operator shall keep a record of the daily amount of material loaded into the tank and the cumulative annual amount of material loaded into the tank. [District Rule 2201] Federally Enforceable Through Title V Permit
15. All records shall be maintained on site for a period of at least five years and shall be made available for District inspection upon request. [District Rules 1070, 2520, 9.4.2, and 4623, 6.3] Federally Enforceable Through Title V Permit

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

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-2174-33-1

EXPIRATION DATE: 09/30/2015

EQUIPMENT DESCRIPTION:

ONE 2,000 GALLON FIXED ROOF STORAGE TANK FOR WASTE COATINGS AND SOLVENTS WITH ALL TANK VAPORS CONTROLLED BY A SHARED CARBON ABSORPTION SYSTEM WITH TWO 200 LB US FILTER MODEL VSC200 FILTERS IN SERIES (SHARED WITH N-2174-32)

PERMIT UNIT REQUIREMENTS

1. This tank shall be maintained in a leak-free condition. A leak-free condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit and Rule 4623 (amended 5/19/05). [District Rule 4623, 3.11, 5.1.3, & 6.4.8] Federally Enforceable Through Title V Permit
2. The storage tank shall be equipped with a pressure-vacuum (PV) relief valve shall be set to within 10% of the maximum allowable working pressure of the tank, permanently labeled with the operating pressure settings, properly maintained in good operating order in accordance with the manufacturer's instructions, and shall remain in leak-free condition except when the operating pressure exceeds the valve's set pressure. [District Rules 2201 and 4623, 5.1 & 5.2] Federally Enforceable Through Title V Permit
3. Only waste coatings and solvents shall be stored in this tank. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The VOC control efficiency of the carbon absorption system shall be 90% or greater. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The maximum throughput shall not exceed 2,000 gallons in any one day and 20,000 gallons in any one calendar year. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The true vapor pressure (TVP) of the organic liquid stored in the tank shall be less than 11 psia at the actual storage temperature of the tank contents. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The operator shall conduct true vapor pressure (TVP) testing of the organic liquid stored in the tank at least once per year in accordance with the methods described in Section 6.4 of District Rule 4623 (amended 5/19/05). Determinations shall be made annually during the summer (July - September) and whenever there is a change in the source or type of the organic liquid stored in the tank. [District Rules 2201, 2520, 9.3.2, and 4623, 6.2.2] Federally Enforceable Through Title V Permit
8. The TVP testing shall be conducted at actual storage temperature of the organic liquid in the tank. [District Rules 2201 and 4623, 6.2.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

9. For organic liquids, the true vapor pressure (TVP) shall be measured using Reid vapor pressure (RVP) ASTM Method D 323-94 (Test Methods for Vapor Pressure for Petroleum Products), and converting the RVP to TVP at the tank's maximum organic liquid storage temperature. The conversion of RVP to TVP shall be done in accordance with the procedures in Appendix B of District Rule 4623 (Amended 5/19/05). Appendix B is an excerpt from the oil and gas section of "California Air Resources Boards (ARB) Technical Guidance Document to the Criteria and Guidelines Regulations for AB 2588", dated August 1989. Alternate methods of determining the true vapor pressure may be utilized if prior approval is obtained from the District and EPA. [District Rules 2201 and 4623, 6.4.3] Federally Enforceable Through Title V Permit
10. The operator shall keep and shall submit records of TVP testing to the APCO within 45 days after the date of testing. The records shall include the tank identification number, Permit to Operate number, type of stored organic liquid, TVP of the stored organic liquid, test methods used, ambient temperature at the time the test was conducted, and a copy of the test results. [District Rules 2201 and 4623, 6.3.1 & 6.3.6] Federally Enforceable Through Title V Permit
11. The operator shall perform monthly monitoring of all components associated with the waste solvent tank system using a photo ionization detector (or equivalent). The monitoring shall be conducted in accordance with EPA Method 21 and shall include the sampling point between the primary and back-up carbon canisters. The primary canister shall be replaced when measurable levels of VOC emissions are detected at the sampling point between the primary and back-up carbon canisters. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The carbon canisters removed from the system shall be sealed vapor tight. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Records shall be maintained of all maintenance activities for the carbon canister system. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The operator shall keep a record of the daily amount of material loaded into the tank and the cumulative annual amount of material loaded into the tank. [District Rule 2201] Federally Enforceable Through Title V Permit
15. All records shall be maintained on site for a period of at least five years and shall be made available for District inspection upon request. [District Rules 1070, 2520, 9.4.2, and 4623, 6.3] Federally Enforceable Through Title V Permit

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

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ATTACHMENT B

Authorities to Construct



AUTHORITY TO CONSTRUCT

PERMIT NO: N-2174-32-0

ISSUANCE DATE: 09/02/2011

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:

ONE 4,000 GALLON FIXED ROOF STORAGE TANK FOR WASTE COATINGS AND SOLVENTS WITH ALL TANK VAPORS CONTROLLED BY A SHARED CARBON ABSORPTION SYSTEM WITH TWO 200 LB US FILTER MODEL VSC200 FILTERS IN SERIES (SHARED WITH N-2174-33). THIS TANK REPLACES N-2174-24.

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. Permit to Operate N-2174-24 shall be cancelled upon the implementation of this Authority to Construct. [District Rule 2201]
3. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
4. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
5. This tank shall be maintained in a leak-free condition. A leak-free condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit and Rule 4623 (amended 5/19/05). [District Rule 4623, 3.11, 5.1.3, & 6.4.8]

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO



DAVID WARNER, Director of Permit Services

N-2174-32-0 Sep 2 2011 1:52PM - HARADERJ - Joint Inspection NOT Required

6. The storage tank shall be equipped with a pressure-vacuum (PV) relief valve shall be set to within 10% of the maximum allowable working pressure of the tank, permanently labeled with the operating pressure settings, properly maintained in good operating order in accordance with the manufacturer's instructions, and shall remain in leak-free condition except when the operating pressure exceeds the valve's set pressure. [District Rules 2201 and 4623, 5.1 & 5.2]
7. Only waste coatings and solvents shall be stored in this tank. [District Rule 2201]
8. The VOC control efficiency of the carbon absorption system shall be 90% or greater. [District Rule 2201]
9. The maximum throughput shall not exceed 4,000 gallons in any one day and 28,000 gallons in any one calendar year. [District Rule 2201]
10. The true vapor pressure (TVP) of the organic liquid stored in the tank shall be less than 11 psia at the actual storage temperature of the tank contents. [District Rule 2201]
11. The operator shall conduct true vapor pressure (TVP) testing of the organic liquid stored in the tank at least once per year in accordance with the methods described in Section 6.4 of District Rule 4623 (amended 5/19/05). Determinations shall be made annually during the summer (July - September) and whenever there is a change in the source or type of the organic liquid stored in the tank. [District Rules 2201, 2520, 9.3.2, and 4623, 6.2.2]
12. The TVP testing shall be conducted at actual storage temperature of the organic liquid in the tank. [District Rules 2201 and 4623, 6.2.2]
13. For organic liquids, the true vapor pressure (TVP) shall be measured using Reid vapor pressure (RVP) ASTM Method D 323-94 (Test Methods for Vapor Pressure for Petroleum Products), and converting the RVP to TVP at the tank's maximum organic liquid storage temperature. The conversion of RVP to TVP shall be done in accordance with the procedures in Appendix B of District Rule 4623 (Amended 5/19/05). Appendix B is an excerpt from the oil and gas section of "California Air Resources Boards (ARB) Technical Guidance Document to the Criteria and Guidelines Regulations for AB 2588", dated August 1989. Alternate methods of determining the true vapor pressure may be utilized if prior approval is obtained from the District and EPA. [District Rules 2201 and 4623, 6.4.3]
14. The operator shall keep and shall submit records of TVP testing to the APCO within 45 days after the date of testing. The records shall include the tank identification number, Permit to Operate number, type of stored organic liquid, TVP of the stored organic liquid, test methods used, ambient temperature at the time the test was conducted, and a copy of the test results. [District Rules 2201 and 4623, 6.3.1 & 6.3.6]
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16. The carbon canisters removed from the system shall be sealed vapor tight. [District Rule 2201]
17. Records shall be maintained of all maintenance activities for the carbon canister system. [District Rule 2201]
18. The operator shall keep a record of the daily amount of material loaded into the tank and the cumulative annual amount of material loaded into the tank. [District Rule 2201]
19. 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 4623, 6.3]



AUTHORITY TO CONSTRUCT

PERMIT NO: N-2174-33-0

ISSUANCE DATE: 09/02/2011

LEGAL OWNER OR OPERATOR: SILGAN CONTAINERS MFR. CORP.
MAILING ADDRESS: 3250 PATTERSON ROAD
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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. Permit to Operate N-2174-31 shall be cancelled upon the implementation of this Authority to Construct. [District Rule 2201]
3. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
4. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
5. This tank shall be maintained in a leak-free condition. A leak-free condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit and Rule 4623 (amended 5/19/05). [District Rule 4623, 3.11, 5.1.3, & 6.4.8]

CONDITIONS CONTINUE ON NEXT PAGE

YOU **MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT.** This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

DAVID WARNER, Director of Permit Services

N-2174-33-0, Sep 2 2011 1:52PM - HARADERU Joint Inspection NOT Required

6. The storage tank shall be equipped with a pressure-vacuum (PV) relief valve shall be set to within 10% of the maximum allowable working pressure of the tank, permanently labeled with the operating pressure settings, properly maintained in good operating order in accordance with the manufacturer's instructions, and shall remain in leak-free condition except when the operating pressure exceeds the valve's set pressure. [District Rules 2201 and 4623, 5.1 & 5.2]
7. Only waste coatings and solvents shall be stored in this tank. [District Rule 2201]
8. The VOC control efficiency of the carbon absorption system shall be 90% or greater. [District Rule 2201]
9. The maximum throughput shall not exceed 2,000 gallons in any one day and 20,000 gallons in any one calendar year. [District Rule 2201]
10. The true vapor pressure (TVP) of the organic liquid stored in the tank shall be less than 11 psia at the actual storage temperature of the tank contents. [District Rule 2201]
11. The operator shall conduct true vapor pressure (TVP) testing of the organic liquid stored in the tank at least once per year in accordance with the methods described in Section 6.4 of District Rule 4623 (amended 5/19/05). Determinations shall be made annually during the summer (July - September) and whenever there is a change in the source or type of the organic liquid stored in the tank. [District Rules 2201, 2520, 9.3.2, and 4623, 6.2.2]
12. The TVP testing shall be conducted at actual storage temperature of the organic liquid in the tank. [District Rules 2201 and 4623, 6.2.2]
13. For organic liquids, the true vapor pressure (TVP) shall be measured using Reid vapor pressure (RVP) ASTM Method D 323-94 (Test Methods for Vapor Pressure for Petroleum Products), and converting the RVP to TVP at the tank's maximum organic liquid storage temperature. The conversion of RVP to TVP shall be done in accordance with the procedures in Appendix B of District Rule 4623 (Amended 5/19/05). Appendix B is an excerpt from the oil and gas section of "California Air Resources Boards (ARB) Technical Guidance Document to the Criteria and Guidelines Regulations for AB 2588", dated August 1989. Alternate methods of determining the true vapor pressure may be utilized if prior approval is obtained from the District and EPA. [District Rules 2201 and 4623, 6.4.3]
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15. The operator shall perform monthly monitoring of all components associated with the waste solvent tank system using a photo ionization detector (or equivalent). The monitoring shall be conducted in accordance with EPA Method 21 and shall include the sampling point between the primary and back-up carbon canisters. The primary canister shall be replaced when measurable levels of VOC emissions are detected at the sampling point between the primary and back-up carbon canisters. [District Rule 2201]
16. The carbon canisters removed from the system shall be sealed vapor tight. [District Rule 2201]
17. Records shall be maintained of all maintenance activities for the carbon canister system. [District Rule 2201]
18. The operator shall keep a record of the daily amount of material loaded into the tank and the cumulative annual amount of material loaded into the tank. [District Rule 2201]
19. 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 4623, 6.3]

ATTACHMENT C

Title V Compliance Certification Form

San Joaquin Valley Unified Air Pollution Control District

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

- SIGNIFICANT PERMIT MODIFICATION ADMINISTRATIVE
 MINOR PERMIT MODIFICATION AMENDMENT

COMPANY NAME: Silgan Containers Mfg. Corp.	FACILITY ID: N - 2174
1. Type of Organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name: Silgan Containers Mfg. Corp.	
3. Agent to the Owner: Plant Manager, Gary Miller	

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

- Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).
- Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.
- Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
- Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

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



 Signature of Responsible Official

8/5/11

 Date

Gary Miller

 Name of Responsible Official (please print)

Plant Manager

 Title of Responsible Official (please print)