



**TITLE V FEDERAL OPERATING PERMIT
AND
SMAQMD RULE 201 PERMIT TO OPERATE**

TITLE V PERMIT NO:
TV2016-15-01

**PERMIT
ISSUED:**

TBD

**PERMIT
LAST AMENDED:**

8/29/2011

**PERMIT
EXPIRES:**

TBD

(5 years from date of issuance)

ISSUED TO:

Silgan Can Company
6200 Franklin Boulevard, Suite 100
Sacramento, CA 95824-3412

FACILITY LOCATION:

Silgan Can Company
6200 Franklin Boulevard, Suite 100
Sacramento, CA

RESPONSIBLE OFFICIAL:

Glenn Hohloch
Plant Manager
(916) 399-2594

CONTACT PERSON:

Glenn Hohloch
Plant Manager
(916) 399-2594

NATURE OF BUSINESS:

Manufacturing Steel Food Cans

**STANDARD INDUSTRIAL
CLASSIFICATION (SIC):**

3411

Alberto Ayala
SMAQMD Air Pollution Control Officer

by: _____
Steve Mosunic
Air Quality Engineer

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I. PERMIT SUMMARY

This permit will serve as a conditional Permit to Operate pursuant to SMAQMD Rule 201 (General Permit Requirements) and SMAQMD Rule 207 (Title V - Federal Operating Permit Program). Requirements identified in the permit as non-federally enforceable are not enforceable by U.S. EPA. However, they are enforceable by the Sacramento Metropolitan Air Quality Management District (SMAQMD)

The application for this air quality Permit to Operate was evaluated for compliance with SMAQMD, State, and Federal air quality rules and regulations. The following listed rules are those that were found to be applicable at the time of permit review, based on the information submitted with the Title V permit application.

Citation	Description	Rule Adoption Date	Federally Enforceable?
SMAQMD Rule 101	General Provisions and Definitions	10-27-2011	Yes
SMAQMD Rule 102	Circumvention	11-29-1983	Yes
SMAQMD Rule 108	Minor Violation	10-01-1998	No
SMAQMD Rule 201	General Permit Requirements (SIP approved)	11-20-1984	Yes
SMAQMD Rule 201	General Permit Requirements (not SIP approved)	08-24-2006	No
SMAQMD Rule 202	New Source Review (SIP approved)	11-20-1984	Yes
SMAQMD Rule 202	New Source Review (Not SIP approved. SIP approval of 11-20-84 version was withdrawn on 08-19-2011.)	08-23-2012	No
SMAQMD Rule 207	Title V - Federal Operating Permit Program (not SIP approved but rule is applicable as part of U.S. EPA approval of the SMAQMD Title V program)	07-28-2011	Yes
SMAQMD Rule 213	Federal Major Modifications (It is not a SIP approved rule, but the requirements within it are part of EPA's NSR reform and are thus federally applicable)	03-23-2006	No
SMAQMD Rule 214	Federal New Source Review	08-23-2012	Yes
SMAQMD Rule 217	Public Notice Requirements for Permits	08-23-2012	Yes

I. PERMIT SUMMARY

Citation	Description	Rule Adoption Date	Federally Enforceable?
SMAQMD Rule 301	Permit Fees - Stationary Source (not SIP approved but Title V fees in rule applicable as part of U.S. EPA approval of the SMAQMD Title V program)	07-25-2013	Yes (Title V provisions only)
SMAQMD Rule 302	Hearing Board Fees	02-05-1998	No
SMAQMD Rule 307	Clean Air Act Fees	09-26-2002	Yes
SMAQMD Rule 401	Ringelmann Chart	04-05-1983	Yes
SMAQMD Rule 402	Nuisance	08-03-1977	No
SMAQMD Rule 403	Fugitive Dust	11-29-1983	Yes
SMAQMD Rule 404	Particulate Matter	11-20-1984	Yes
SMAQMD Rule 406	Specific Contaminants	11-29-1983	Yes
SMAQMD Rule 407	Open Burning	11-29-1983	Yes
SMAQMD Rule 414	Natural Gas Fired Water Heaters	08-01-1996	Yes
SMAQMD Rule 420	Sulfur Content of Fuels	11-29-1983	Yes
SMAQMD Rule 441	Organic Solvents	11-29-1983	Yes
SMAQMD Rule 442	Architectural Coatings (SIP approved)	09-05-1996	Yes
SMAQMD Rule 442	Architectural Coatings (not SIP approved)	09-24-2015	No
SMAQMD Rule 451	Surface Coating of Miscellaneous Metal Parts and Products	10-28-2010	Yes
SMAQMD Rule 452	Can Coating	09-25-2008	Yes
SMAQMD Rule 460	Adhesives and Sealants (not SIP approved)	11-30-2000	No
SMAQMD Rule 601	Procedure Before the Hearing Board (not SIP approved)	02-05-1998	No
SMAQMD Rule 602	Breakdown Conditions: Emergency Variance (not SIP approved)	12-06-1978	No
U.S. EPA Chemical Accident Prevention Provisions	Chemical Accident Prevention Provisions [40 CFR Part 68]	01/13/2016 (A)	Yes
U.S. EPA Protection of Stratospheric Ozone	Protection of Stratospheric Ozone [40 CFR Part 82]	11/18/2016 (A)	Yes

(A) U.S. EPA promulgation/amendment date.

I. PERMIT SUMMARY

Future changes in prohibitory rules may establish more stringent requirements that may, at the SMAQMD level, supersede the conditions listed here. For Title V purposes however, the federally enforceable requirements are those found in the Title V permit. Federally enforceable provisions of the Title V permit do not change until the Title V permit is revised.

Permit Background

<u>Permit Action</u>	<u>Date Issued</u>	<u>Federal Title V Operating Permit No.</u>
Initial permit issued:	08-29-2001	TV99-15-01
1 st Administrative Amendment	11-25-2002	TV99-15-01A
1 st Minor Modification	07-26-2005	TV99-15-02
1 st Permit Renewal	08-29-2006	TV2005-15-01
1 st Administrative Amendment	06-07-2010	TV2005-15-01A
2 nd Permit Renewal	08-29-2011	TV2010-15-01
1 st Administrative Amendment	Subsumed*	TV2010-15-01B
1 st Minor Modification	Subsumed*	TV2010-15-02
2 nd Minor Modification	Subsumed*	TV2010-15-03

*Subsumed under permit TV2016-15-01

Current Permitting Action

This 3rd permit renewal will be assigned the following permit number: TV2016-15-01.

Silgan Can Company is requesting to renew the Title V federal operating permit for its facility which was issued on 08-29-2011. This permit renewal will also include an administrative permit mod to add PPG P4553304 to Permit to Operate 22883 to the list of approved coatings, a minor modification to add PPG P4553304 to Permit to Operate 23328 to the list of approved coatings, and a minor modification to remove the requirement to list coatings individually in Permit to Operate 23454. Permit to Operate 22883 and 23328 were cancelled and subsumed by Permit to Operate 23454.

II. FACILITY DESCRIPTION

Silgan Can Company manufactures steel cans for the food canning industry. They purchased their Sacramento facility from Campbell Soup Company in June 1998.

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

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

Drawn and Ironed (D and I) Can Production:

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

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

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

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

Both ovens, the spray machine manifold, and the covered conveyor are vented to a 16,000 scfm thermal oxidizer which typically operates at 1,500°F with a retention time of 1 second.

II. FACILITY DESCRIPTION

Drawn and Ironed Can Production Line

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

Maintenance and Support Activities:

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

III. FEDERALLY ENFORCEABLE GENERAL REQUIREMENTS

TITLE V PERMIT MODIFICATIONS AND RENEWAL

1. The permit holder must submit to the SMAQMD Air Pollution Control Officer a complete Title V permit application for renewal no later than 12 months prior to the expiration date of the Title V permit.
[Basis: SMAQMD Rule 207 Section 301.3]
2. The permit holder must submit to the SMAQMD Air Pollution Control Officer a complete Title V permit application for minor Title V permit modification when applicable. The application must be submitted after receiving any required preconstruction permit from the SMAQMD and before commencing operation associated with the Minor Title V permit modification.
[Basis: SMAQMD Rule 207 Section 301.5]
3. The permit holder must submit to the SMAQMD Air Pollution Control Officer a complete Title V permit application for Significant Title V permit modification when applicable. The application must not be submitted prior to receiving any required preconstruction permit from the SMAQMD but no later than 12 months after commencing an operation associated with the Significant Title V permit modification. Where an existing federally enforceable Title V permit condition would prohibit such change in operation or the stationary source is not required to obtain a preconstruction permit, the owner or operator must obtain a Title V permit modification before commencing operation.
[Basis: SMAQMD Rule 207 Section 301.6]
4. The permit holder must submit to the SMAQMD Air Pollution Control Officer timely updates to the Title V application as new applicable federal requirements become applicable to the source.
[Basis: SMAQMD Rule 207 Section 302.1]
5. The permit holder must submit to the SMAQMD Air Pollution Control Officer any additional information necessary to correct any incorrect information in the Title V permit application upon becoming aware of such incorrect submittal or if the applicant is notified by the SMAQMD Air Pollution Control Officer of such incorrect submittal.
[Basis: SMAQMD Rule 207 Section 302.2]
6. The permit holder must submit to the SMAQMD Air Pollution Control Officer any additional information relating to the Title V application within 30 days if such information is requested in writing by the SMAQMD Air Pollution Control Officer.
[Basis: SMAQMD Rule 207 Section 302.3]
7. Title V permit expiration terminates the stationary source's right to operate unless a timely and complete Title V permit application for renewal has been submitted and the stationary source complies with SMAQMD Rule 207 Sections 303.1(a), (b), (c), and (d), in which case the existing Title V permit will remain in effect until the Title V permit renewal has been issued or denied.
[Basis: SMAQMD Rule 207 Section 303.2]

III. FEDERALLY ENFORCEABLE GENERAL REQUIREMENTS

8. Any Title V application form, report, or compliance certification submitted pursuant to a federally enforceable requirement in this permit must contain certification by a responsible official. The certification must state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

[Basis: SMAQMD Rule 207 Section 304]

9. This Title V permit has a 5-year fixed term from the date of issuance. The Title V permit will have a new 5-year fixed term from the date of final action on reopening if the responsible official chooses to submit to the SMAQMD a complete Title V application for renewal upon reopening of the Title V permit pursuant to Sections 411 or 412 of SMAQMD Rule 207, and the Title V permit is renewed according to the administrative procedures listed in SMAQMD Rule 207 Sections 401 through 408.

[Basis: SMAQMD Rule 207 Section 306]

PERMIT COMPLIANCE

10. The permit holder must comply with all conditions of the Title V permit.

[Basis: SMAQMD Rule 207 Section 305.1(k)(1)]

11. Compliance with the conditions of the Title V permit will be deemed compliance with all applicable requirements identified in the Title V permit.

[Basis: SMAQMD Rule 207 Section 307]

12. It may not be a defense for a permit holder in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the Title V permit.

[Basis: SMAQMD Rule 207 Section 305.1(k)(2)]

13. This Title V permit may be modified, revoked, reopened and reissued, or terminated for cause.

[Basis: SMAQMD Rule 207 Section 305.1(k)(3)]

14. The permit holder must furnish to the SMAQMD Air Pollution Control Officer, within a reasonable time, any information that the SMAQMD Air Pollution Control Officer may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit pursuant to SMAQMD Rule 207 Section 411, or to determine compliance with this Title V permit. Upon request, the permit holder must also furnish to the SMAQMD Air Pollution Control Officer copies of records required to be kept by conditions of this permit or, for information claimed to be confidential, the permit holder may furnish such records directly to the U.S. EPA along with a claim of confidentiality.

[Basis: SMAQMD Rule 207 Section 305.1(k)(4)]

15. Noncompliance with any federally enforceable requirement in this Title V permit is grounds for Title V permit termination, revocation and reissuance, modification, enforcement action or denial of the Title V permit renewal application. Any violation of the Title V permit will also be a violation of SMAQMD Rule 207.

[Basis: SMAQMD Rule 207 Section 305.1(k)(5)]

III. FEDERALLY ENFORCEABLE GENERAL REQUIREMENTS

16. A pending Title V permit action (e.g. a proposed permit revision) or notification of anticipated noncompliance does not stay any permit condition.

[Basis: SMAQMD Rule 207 Section 305.1(k)(6)]

17. This Title V permit does not convey any property rights of any sort or any exclusive privilege.

[Basis: SMAQMD Rule 207 Section 305.1(k)(7)]

18. Upon presentation of credentials and other documents as may be required by law, the permit holder must allow the SMAQMD Air Pollution Control Officer or an authorized representative to perform all of the following:

- A. Enter upon the stationary source's premises where this source is located, where emissions related activity is conducted or where records must be kept under the conditions of this permit;
- B. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- C. Inspect at reasonable times, the stationary source, equipment (including monitoring and air pollution control equipment), practices and operations regulated or required under this permit, and;
- D. As authorized by the Federal Clean Air Act, sample or monitor at reasonable times, substances or parameters for the purpose of assuring compliance with the permit conditions or applicable federal requirements.

[Basis: SMAQMD Rule 207 Section 413.1]

REPORTS AND RECORD KEEPING

19. Monitoring Reports

- A. The permit holder must submit to the SMAQMD Air Pollution Control Officer at least once every six months, unless required more frequently by an applicable requirement, reports of all required monitoring. All instances of deviations from Title V permit monitoring conditions must be clearly identified in such reports.
- B. The reporting periods for this permit are January 1 through June 30 and July 1 through December 31. The reports must be submitted by July 30 and January 30 of each year respectively.
- C. All required reports must be certified by the responsible official and must state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

[Basis: SMAQMD Rule 207, Section 501.1]

III. FEDERALLY ENFORCEABLE GENERAL REQUIREMENTS

20. Compliance Reports

- A. The permit holder must submit to the SMAQMD Air Pollution Control Officer and U.S. EPA (Air-3, U.S. EPA, Region IX) on an annual basis, unless required more frequently by additional applicable federal requirements such as Section 114(a)(3) and 504(b) (42 U.S.C. Sections 7414(a)(3) and 7661c(b)) of the Federal Clean Air Act, a certification of compliance by the responsible official with all terms and conditions contained in the Title V permit, including emission limitations, standards and work practices.
- B. The reporting period for this permit is January 1 through December 31. The report must be submitted by January 30 of each year.
- C. All required reports must be certified by the responsible official and must state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.
- D. The compliance certification must include the following:
 - i. The identification of each term or condition of the Title V permit that is the basis of the certification.
 - ii. The method(s) used for determining the compliance status of the source, currently and over the reporting period, and whether such method(s) provides continuous or intermittent data.
 - iii. The status of compliance with the terms and conditions of the Title V permit for the period covered by the certification, based on the method designated in Section D(ii) of this condition. The certification must identify each deviation and take it into account in the compliance certification. The certification must also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion occurred. An excursion is a departure from an indicator range established for monitoring under this part, consistent with any averaging period specified for averaging the results of the monitoring.
 - iv. Such other facts as the SMAQMD Air Pollution Control Officer may require to determine the compliance status of the source.
 - v. In accordance with SMAQMD Rule 207 Section 305, a method for monitoring the compliance of the stationary source with its emissions limitations, standards and work practices.

[Basis: SMAQMD Rule 207 Section 413.4, 40 CFR 64, and 40 CFR 70.6(c)(5)(iii)]

- 21. The permit holder must report within 24 hours of detection any deviation from a federally enforceable Title V permit condition not attributable to an emergency. In order to fulfill the reporting requirement of this condition, the permit holder must notify the SMAQMD Air Pollution Control Officer by telephone followed by a written statement describing the nature of the deviation from the federally enforceable permit condition.

[Basis: SMAQMD Rule 207 Section 501.3]

III. FEDERALLY ENFORCEABLE GENERAL REQUIREMENTS

22. All monitoring data and support information required by a federally enforceable applicable requirement must be kept by the stationary source for a period of 5 years from the date of the monitoring sample, measurement, report or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the federally enforceable applicable requirement in the Title V permit.

[Basis: SMAQMD Rule 207 Section 502.3]

RINGELMANN CHART

23. Except as otherwise provided in SMAQMD Rule 401 Section 100, the permit holder must not discharge into the atmosphere from any single source of emission whatsoever any air contaminant, other than uncombined water vapor, for a period or periods aggregating more than three minutes in any one hour which is:

- A. As dark or darker in shade as that designated No. 1 on the Ringelmann Chart, as published by the United States Bureau of Mines, or
- B. Of such opacity as to obscure a human observer's view, or a certified calibrated in-stack opacity monitoring system to a degree equal to or greater than No. 1 on the Ringelmann Chart.

[Basis: SMAQMD Rule 401 Section 301]

PARTICULATE MATTER

24. The permit holder must take every reasonable precaution not to cause or allow the emissions of fugitive dust from being airborne beyond the property line from which the emission originates, from any construction, handling or storage activity, or any wrecking, excavation, grading, clearing of land or solid waste disposal operation. Reasonable precautions may include, but are not limited to:

- A. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the construction of roadways or the clearing of land.
- B. Application of asphalt, oil, water, or suitable chemicals on dirt roads, materials stockpiles and other surfaces which can give rise to airborne dusts;
- C. Other means approved by the SMAQMD Air Pollution Control Officer.

[Basis: SMAQMD Rule 403 Section 301]

25. Except as otherwise provided in SMAQMD Rule 406, the permit holder must not discharge into the atmosphere from any source particulate matter in excess of 0.23 grams per dry standard cubic meter (0.1 grains per dry standard cubic foot).

[Basis: SMAQMD Rule 404 Section 301]

III. FEDERALLY ENFORCEABLE GENERAL REQUIREMENTS

26. The permit holder must not discharge into the atmosphere particulate matter from the burning of any kind of material containing carbon in a free or combined state, from any single source of emission whatsoever, combustion contaminants in any state or combination thereof exceeding in concentration at the point of discharge: 0.23 grams per dry standard cubic meter (0.1 grains per dry standard cubic foot) of gas calculated to 12% carbon dioxide (CO₂) at standard conditions.

[Basis: SMAQMD Rule 406 Section 302]

SULFUR COMPOUNDS

27. The permit holder must not discharge into the atmosphere from any single source of emission whatsoever sulfur compounds in any state or combination thereof exceeding in concentration at the point of discharge: sulfur compounds, calculated as sulfur dioxide (SO₂): 0.2% by volume.

[Basis: SMAQMD Rule 406 Section 301]

28. Except as otherwise provided in Section 110 of Rule 420, the permit holder must not burn any gaseous fuel containing sulfur compounds in excess of 1.14 grams per cubic meter (50 grains per 100 cubic feet) of gaseous fuel, calculated as hydrogen sulfide at standard conditions, or any liquid fuel or solid fuel having a sulfur content in excess of 0.5% by weight.

[Basis: SMAQMD Rule 420 Section 301]

ARCHITECTURAL COATING AND SOLVENT CLEANING

29. Any coating applied to stationary structures and their appurtenances, to mobile homes, to pavements, or to curbs, must meet the requirements of SMAQMD Rule 442.

[Basis: SMAQMD Rule 442]

30. All VOC-containing materials used for architectural coating, including clean-up, must be stored in closed containers when not in use. In use includes, but is not limited to: being accessed, filled, emptied, maintained or repaired.

[Basis: SMAQMD Rule 442 Section 304]

31. The permit holder must comply with the requirements of SMAQMD Rule 466 Solvent Cleaning when using volatile organic compounds for the cleanup of architectural coating application equipment or for other applications of solvent cleaning at the facility.

[Basis: SMAQMD Rule 466]

32. The permit holder must keep a record of all architectural coatings purchased that are not clearly labeled as complying with the VOC content limits contained in SMAQMD Rule 442. Compliance in these cases can be determined by maintaining records of the manufacturer's certifications or by Material Safety Data Sheets (MSDS) that demonstrate compliance with the VOC limits of SMAQMD Rule 442.

[Basis: SMAQMD Rule 442 and SMAQMD Rule 207 Section 305]

33. The permit holder must comply with the requirements of SMAQMD Rule 452 Can Coating when using volatile organic compounds to use or apply any coating on any coating line or

III. FEDERALLY ENFORCEABLE GENERAL REQUIREMENTS

for other applications of solvent cleaning at the facility.

[Basis: SMAQMD Rule 452]

EQUIPMENT BREAKDOWNS

34. An emergency constitutes an affirmative defense to an action brought for noncompliance with technology based emission limitations if the following conditions are met:

A. The affirmative defense of an emergency must be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

- i. An emergency occurred and that the permit holder can identify the cause(s) of the emergency.
- ii. The permitted facility was at the time being properly operated.
- iii. During the period of the emergency the permit holder took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the Title V permit.
- iv. The permit holder submitted notice of the emergency to the SMAQMD Air Pollution Control Officer within two working days of the time when emissions limitations were exceeded due to the emergency. The notice must contain a description of the emergency and corrective actions taken.

B. In any enforcement proceedings, the permit holder seeking to establish the occurrence of an emergency has the burden of proof.

[Basis: SMAQMD Rule 207 Section 414]

35. The permit holder must notify the SMAQMD Air Pollution Control Officer of any occurrence which constitutes an emergency as defined in SMAQMD Rule 207 Section 212 as soon as reasonably possible, but no later than one hour after its detection. If the emergency occurs when the SMAQMD Air Pollution Control Officer cannot be contacted, their report of the emergency must be made at the commencement of the next regular working day. The notification must identify the time, specific location, equipment involved and to the extent known the cause(s) of the occurrence.

[Basis: SMAQMD Rule 207 Section 501.2]

PAYMENT OF FEES

36. The fee for (1) the issuance of a Title V operating permit, (2) the annual renewal and inspection of a Title V operating permit, (3) the modification of a Title V operating permit or (4) an administrative Title V permit amendment must be assessed in accordance with SMAQMD Rule 301, Section 313.

[[Basis: SMAQMD Rule 207 Section 305.7 and SMAQMD Rule 301 Section 313]

III. FEDERALLY ENFORCEABLE GENERAL REQUIREMENTS

37. After the provisions for granting permits as set forth in SMAQMD Rule 207 have been complied with, the permit holder will be notified by mail of the fee due and payable and the date the fee is due. If the fee is not paid by the specified due date, the fee will be increased by one half the amount and the applicant/permit holder will be notified by mail of the increased fee. If the increased fee is not paid within 30 days after notice the application/permit will be canceled and the applicant/permit holder will be notified by mail.

[Basis: SMAQMD Rule 207 Section 305.7 and Rule 301 Section 401]

CLEAN AIR ACT FEES

38. After the U.S. EPA determines that the SMAQMD has failed to demonstrate attainment of the one hour ozone ambient air quality standard by the attainment year, the permit holder, operating any major stationary source of VOC or NOx, must pay the Clean Air Act fees specified by the SMAQMD Air Pollution Control Officer in accordance with SMAQMD Rule 307.

[Basis: SMAQMD Rule 307]

EMISSION STATEMENTS

39. The permit holder, when operating any stationary source that emits 25 tons or more per year of VOC or NOx of actual emissions, must annually provide the SMAQMD Air Pollution Control Officer with a written emission statement showing actual emissions of VOC and NOx from that source.

[Basis: SMAQMD Rule 105]

ACCIDENTAL RELEASES

40. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permit holder must register and submit to the U.S. EPA the required data related to the risk management plan (RMP) for reducing the probability of accidental releases of any regulated substances listed pursuant to Section 112(r)(3) of the CAA as amended in 40 CFR 68.130. The list of substances, threshold quantities and accident prevention regulations promulgated under 40 CFR Part 68 do not limit in any way the general duty provisions under Section 112(r)(1).

[Basis: 40 CFR Part 68]

41. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permit holder must comply with the requirements of 40 CFR Part 68 no later than the latest of the following dates as provided in 40 CFR Part 68.10(a):

A. June 21, 1999,

B. Three years after the date on which a regulated substance is first listed under 40 CFR Part 68.130, or

C. The date on which a regulated substance is first present above a threshold quantity in a process.

[Basis: 40 CFR Part 68]

III. FEDERALLY ENFORCEABLE GENERAL REQUIREMENTS

42. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permit holder must submit any additional relevant information requested by any regulatory agency necessary to ensure compliance with the requirements of 40 CFR Part 68.

[Basis: 40 CFR Part 68]

43. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permit holder must annually certify compliance with all applicable requirements of Section 112(r) as part of the annual compliance certification as required by SMAQMD Rule 207 Section 413.4.

[Basis: 40 CFR Part 68]

TITLE VI REQUIREMENTS (OZONE DEPLETING SUBSTANCES)

44. The permit holder, when opening appliances containing CFCs for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR Part 82.156.

[Basis: 40 CFR Part 82 Subpart F]

45. Equipment used during the maintenance, service, repair, or disposal of appliances containing CFCs must comply with the standards for recycling and recovery equipment pursuant to 40 CFR Part 82.158.

[Basis: 40 CFR Part 82 Subpart F]

46. Persons performing maintenance, service, repair or disposal of appliances containing CFCs must be certified by an approved technician certification program pursuant to 40 CFR Part 82.161.

[Basis: 40 CFR Part 82 Subpart F]

PERMIT SHIELD

47. Tooling changes necessary to produce cans with different diameters and heights will not be considered an equipment modification pursuant to SMAQMD Rule 202 Section 222 and will not trigger New Source Review.

[Basis: SMAQMD Rule 202 Section 222 and SMAQMD Rule 207 Section 307]

IV. LOCAL (NON-FEDERALLY ENFORCEABLE) GENERAL REQUIREMENTS

APPLICABILITY:

1. The requirements outlined in this section pertain to the SMAQMD Rule 201 Permit to Operate and are not part of the Title V permit.
[Basis: General Rule limitation]

LOCAL PERMIT RENEWAL:

2. Permits to Operate issued to Silgan Can Company, pursuant to Rule 201 (non-Title V Permits to Operate), must be renewed annually on February 24 and upon payment of the permit renewal fee established pursuant to SMAQMD Rule 301.
[Basis: SMAQMD Rule 301]
3. The SMAQMD Air Pollution Control Officer must review every SMAQMD Rule 201 Permit to Operate upon annual renewal, pursuant to California Health and Safety Code Section 42301(c), to determine that permit conditions are adequate to ensure compliance with, and the enforceability of, SMAQMD rules and regulations applicable to the article, machine, equipment or contrivance for which the permit was issued. Applicable SMAQMD rules and regulations must include those which were in effect at the time the permit was issued or modified, or which have subsequently been adopted and made retroactively applicable to an existing article, machine, equipment or contrivance, by the SMAQMD Board of Directors. The SMAQMD Air Pollution Control Officer must revise the conditions, if such conditions are not consistent, in accordance with all applicable rules and regulations.
[Basis: California Health and Safety Code Section 42301(c)]

GENERAL

4. The SMAQMD Air Pollution Control Officer and/or authorized representatives, upon the presentation of credentials must be permitted:
 - A. To enter upon the premises where the source is located or in which any records are required to be kept under the terms and conditions of this permit to operate.
 - B. At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this Permit to Operate.
 - C. To inspect any equipment, operation, or method required in this Permit to Operate.
 - D. To sample emissions from the source or require samples to be taken.
[Basis: SMAQMD Rule 201, Section 405]
5. Legible copies of all SMAQMD Rule 201 permits must be maintained on the premises with the equipment.
[Basis: SMAQMD Rule 201, Section 401]

IV. LOCAL (NON-FEDERALLY ENFORCEABLE) GENERAL REQUIREMENTS

6. The facility may not discharge air contaminants or other materials that cause injury, detriment, nuisance or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.

[Basis: SMAQMD Rule 402, Section 301]

EQUIPMENT OPERATION:

7. The equipment must be properly maintained and operated in accordance with the information submitted with the application and the manufacturer's recommendations at all times.

[Basis: SMAQMD Rule 201, Section 405 and Rule 202, Section 408.1]

8. This permit does not authorize the emission of air contaminants in excess of those allowed by Division 26, Part 4, Chapter 3 of the Health and Safety Code of the State of California or the Rules and Regulations of the SMAQMD.

[Basis: SMAQMD Rule 201, Sections 303.1, 405]

EQUIPMENT BREAKDOWNS:

9. The permit holder must notify the SMAQMD Air Pollution Control Officer of any occurrence which constitutes a breakdown, as defined in SMAQMD Rule 602 Section 201, as soon as reasonably possible, but no later than one hour after its detection. If the breakdown occurs when the SMAQMD Air Pollution Control Officer cannot be contacted, the report of breakdown must be made at the commencement of the next regular working day. The notification must identify the time, specific location, equipment involved and, to the extent known, the cause(s) of the occurrence.

[Basis: SMAQMD Rule 602]

10. Upon notification of the breakdown condition, the SMAQMD Air Pollution Control Officer must investigate the breakdown condition in accordance with uniform written procedures and guidelines relating to logging of initial reports on appropriate forms, investigation, and enforcement follow-up. If the occurrence does not constitute a breakdown condition, the SMAQMD Air Pollution Control Officer may take appropriate enforcement action.

[Basis: SMAQMD Rule 602]

11. An occurrence which constitutes a breakdown condition, and which persists only until the end of the production run or 24 hours, whichever is sooner (except for continuous air pollution monitoring equipment, for which the period is 96 hours) will constitute a violation of any applicable emission limitation or restriction prescribed by the SMAQMD Rules and Regulations; however, the SMAQMD Air Pollution Control Officer may elect to take no enforcement action if the owner or operator demonstrates to his satisfaction that a breakdown condition exists and the following requirements are met:

- A. The notification required in SMAQMD Rule 602 Section 301.1 is made; and
- B. Immediate appropriate corrective measures are undertaken and compliance is achieved,

IV. LOCAL (NON-FEDERALLY ENFORCEABLE) GENERAL REQUIREMENTS

or the process is shutdown for corrective measures before commencement of the next production run or within 24 hours, whichever is sooner (except for continuous air pollution monitoring equipment for which the period is 96 hours). If the owner or operator elects to shut down, rather than come into immediate compliance, (s)he must nonetheless take whatever steps are possible to minimize the impact of the breakdown within the 24 hour period; and

- C. The breakdown does not interfere with the attainment and maintenance of any national ambient air quality standard.

[Basis: SMAQMD Rule 602]

12. An occurrence which constitutes a breakdown condition must not persist longer than the end of the production run or 24 hours, whichever is sooner (except for continuous air pollution monitoring equipment, for which the period is 96 hours), unless an emergency variance has been obtained.

[Basis: SMAQMD Rule 602]

13. If the breakdown condition will either require more than 24 hours to correct or persists longer than the end of the production run (except for continuous air pollution monitoring equipment, for which the period is 96 hours) the owner or operator may, in lieu of shutdown, request the SMAQMD Air Pollution Control Officer to commence the emergency variance procedure set forth in SMAQMD Rule 602 Section 304.

[Basis: SMAQMD Rule 602]

14. No emergency variance will be granted unless the chairperson of the SMAQMD Hearing Board or other designated member(s) of the SMAQMD Hearing Board finds that:

- A. The occurrence constitutes a breakdown condition;
- B. Continued operation is not likely to create an immediate threat or hazard to public health or safety; and
- C. The requirements for a variance set forth in California Health & Safety Code Sections 42352 and 42353 have been met;
- D. The continued operation in a breakdown condition will not interfere with the attainment or maintenance of the national ambient air quality standards.

[Basis: SMAQMD Rule 602]

15. At any time after an emergency variance has been granted, the SMAQMD Air Pollution Control Officer may request for good cause that the chairperson or designated member(s) reconsider and revoke, modify or further condition the variance. The procedures set forth in SMAQMD Rule 602 Section 304.1 govern any further proceedings conducted under this request.

[Basis: SMAQMD Rule 602]

IV. LOCAL (NON-FEDERALLY ENFORCEABLE) GENERAL REQUIREMENTS

16. An emergency variance will remain in effect only for as long as necessary to repair or remedy the breakdown condition, but in no event after a properly noticed hearing to consider an interim or 90 day variance has been held, or 15 days from the date of the subject occurrence, whichever is sooner.

[Basis: SMAQMD Rule 602]

17. Within one week after a breakdown condition has been corrected, the owner or operator must submit a written report to the SMAQMD Air Pollution Control Officer on forms supplied by the SMAQMD Air Pollution Control Officer describing the causes of the breakdown, corrective measures taken, estimated emissions during the breakdown and a statement that the condition has been corrected, together with the date of correction and proof of compliance. The SMAQMD Air Pollution Control Officer may, at the request of the owner or operator for good cause, extend up to 30 days the deadline for submittal of the report described in this subsection.

[Basis: SMAQMD Rule 602]

18. The burden of proof is on the owner or operator of the source to provide sufficient information to demonstrate that a breakdown did occur. If the owner or operator fails to provide sufficient information, the SMAQMD Air Pollution Control Officer will undertake appropriate enforcement action.

[Basis: SMAQMD Rule 602]

19. Any failure to comply, or comply in a timely manner, with the reporting requirements established in SMAQMD Rule 602 Sections 301.1 and 401 will constitute a separate violation of SMAQMD Rule 602.

[Basis: SMAQMD Rule 602]

20. It will constitute a separate violation of SMAQMD Rule 602 for any person to file with the SMAQMD Air Pollution Control Officer a report which falsely, or without probable cause, claims that an occurrence is a breakdown condition.

[Basis: SMAQMD Rule 602]

21. Severability - if any provision, clause, sentence, paragraph, section or part of these conditions for any reason is judged to be unconstitutional or invalid, such judgment will not affect or invalidate the remainder of these conditions.

[Basis: SMAQMD Rule 101]

ARCHITECTURAL COATINGS

22. Unless applied by an aerosol can or contained within a volume of one liter or less any person who supplies, sells, offers for sale or manufactures any architectural coating for use within the District, as well as any person who applies or solicits the application of any architectural coating within the District must meet the requirements of SMAQMD Rule 442.

[Basis: SMAQMD Rule 442]

V. EQUIPMENT SPECIFIC REQUIREMENTS:

(1) DRAWN AND IRONED CAN MANUFACTURING LINE

(2) WASHCOAT OVEN

(3) INSIDE BAKE OVEN

(4) THERMAL OXIDIZER

A. EQUIPMENT DESCRIPTION -

A. EQUIPMENT DESCRIPTION: The information specified under this section is enforceable by the SMAQMD, U.S. EPA and the public.

The requirements specified under the following sections apply to the following equipment:

Drawn and Ironed Can Manufacturing Line

P/O No.: 23454

Consisting of:

1. Various bodymaking equipment
2. Washcoat application equipment
3. Inside spray coating equipment (vented to thermal oxidizer)

Washcoat Oven (vented to thermal oxidizer)

P/O No.: 13712

Manufacturer: Cincinnati machinery

Model: WCS-C46S

Heat Input: 6.4 MMBTU/hour

Fuel: Natural gas

Inside Bake Oven (vented to thermal oxidizer)

P/O No. 13713

Manufacturer: Somerset Ross

Model: Not known

Heat Input: 14 MMBTU/hour

Fuel: Natural gas

Thermal Oxidizer

P/O No. 22884

Manufacturer: Somerset Ross

Model: RI-3-15000-95

Heat Input: (1) 4 MMBTU/hour and (2) 0.4 MMBTU/hour

Fuel: Natural gas

V. EQUIPMENT SPECIFIC REQUIREMENTS:

(1) DRAWN AND IRONED CAN MANUFACTURING LINE

(2) WASHCOAT OVEN

(3) INSIDE BAKE OVEN

(4) THERMAL OXIDIZER

B. FEDERALLY ENFORCEABLE REQUIREMENTS –

B. EQUIPMENT SPECIFIC FEDERALLY ENFORCEABLE REQUIREMENTS: The requirements specified under this subsection are enforceable by the SMAQMD, U.S. EPA and the public.

EMISSION LIMITS:

1. Emissions from the Drawn and Ironed can manufacturing process must not exceed the following limits:

[Basis: SMAQMD Rules 201 and 202]

Equipment	Pollutant	Emission Limits				
		Daily lb/day	Quarterly lb/quarter			
			1st Quarter	2nd Quarter	3rd Quarter	4th Quarter
D and I Manufacturing Line: (A) Fugitives Non-fugitives (B)	VOC	158.0	10,320	8,303	8,832	10,438
	VOC	71.2	4,644	3,736	3,974	4,698
Washcoat Oven (C) (Natural gas combustion only)	PM10	0.8	70	56	60	70
	SOx	0.04	4	3	3	4
	NOx	7.0	609	490	525	616
	CO	1.5	131	105	113	132
	VOC	0.5	44	36	38	45
Inside Bake Oven (C) (Natural gas combustion only)	PM10	2.5	218	175	188	220
	SOx	0.1	9	7	8	9
	NOx	26.0	2,262	1,820	1,950	2,288
	CO	6.5	566	455	488	572
	VOC	0.5	44	35	38	44
Thermal Oxidizer (D) (Natural gas combustion and coating process)	PM10 (E)	4.7	414	358	377	419
	SOx (E)	0.2	19	16	17	19
	NOx (F)	102.0	8,491	6,832	7,120	8,589
	CO (F)	50.0	4,116	3,311	3,547	4,162
	VOC (F)	72.5	4,736	3,810	4,054	4,791

(A) Emissions based on calculation method outlined below:

V. EQUIPMENT SPECIFIC REQUIREMENTS:

(1) DRAWN AND IRONED CAN MANUFACTURING LINE

(2) WASHCOAT OVEN

(3) INSIDE BAKE OVEN

(4) THERMAL OXIDIZER

B. FEDERALLY ENFORCEABLE REQUIREMENTS –

The VOC emissions from **each** coating process must be based on the following:

$$\text{Fugitive VOC} = \text{Gallons of Coating Sprayed} \times \text{Coating VOC content} \times \% \text{ Fugitives}$$

$$\text{Non-Fugitive VOC} = \text{Gallons of Coating Sprayed} \times \text{Coating VOC content} \times \% \text{ Non-Fugitives} \times 0.05$$

Where,

Gallons of Coating Sprayed	=	gallons/day or gallons/quarter
Coating VOC Content	=	lb VOC/gallon coating
% Fugitives	=	10%
% Non-Fugitives	=	90%
0.05	=	control efficiency factor based on 95% control

(B) Non-fugitive emissions are included in the emissions from the thermal oxidizer.

(C) Emissions based on maximum allowable natural gas throughput (see Condition No. 4) and the emission factors listed below. All combustion emissions are assumed to be vented through the thermal oxidizer.

Equipment	Emission Factors for Natural Gas Combustion lb/MMcf				
	VOC	NOx	SOx	PM10	CO
Washcoat oven (a)	7.3	100	0.6	12	21
Inside bake oven (a)	2.8	140	0.6	13.7	35
Thermal oxidizer	2.8 (b)	598 (c)	0.6 (b)	11.9 (b)	364 (c)

(a) Emission factors from U.S. EPA AP-42, table 1.4.1-3 (10/93)

(b) Emission factors from U.S. EPA AP-42, table 1.4.1-3 (10/96)

(c) Emission factors correspond to a 25 ppmv NOx and a 25 ppmv CO concentration at the maximum thermal oxidizer exhaust flow rate of 16,000 dscfm.

(D) Emissions from the thermal oxidizer include emissions from the washcoat oven, inside bake oven, and non-fugitive ROC emissions from the Drawn and Ironed can manufacturing line with a 95% destruction efficiency. Daily emission limits are based on maximum allowable natural gas throughput for the washcoat oven and inside bake oven (see Condition No. 4) and operating the thermal oxidizer at maximum capacity (4.8 MMBTU/hr), 24 hours/day and the emission factors listed above.

(E) Quarterly PM10 and SOx emission limits are based on maximum allowable natural gas throughput for the washcoat oven and inside bake oven (see Condition No. 4) and operating the thermal oxidizer at maximum capacity (4.8 MMBTU/hr), 24 hours/day, total number of

V. EQUIPMENT SPECIFIC REQUIREMENTS:

(1) DRAWN AND IRONED CAN MANUFACTURING LINE

(2) WASHCOAT OVEN

(3) INSIDE BAKE OVEN

(4) THERMAL OXIDIZER

B. FEDERALLY ENFORCEABLE REQUIREMENTS –

days/quarter and the emission factors listed above.

(F) Quarterly NO_x, CO and ROC emission limits are based on maximum allowable natural gas throughput for the washcoat oven, inside bake oven (see Condition No. 4), and operating the thermal oxidizer at maximum capacity (4.8 MMBTU/hr) 24 hours/day, and the emission factors listed above, plus the non-fugitive ROC emissions from the Drawn and Ironed can manufacturing line with a 95% destruction efficiency.

2. The VOC content of coatings used in the wash coat process must not exceed 250 grams/liter of coating (excluding water and exempt solvents) and 2.8 lb/gal of solids.
[Basis: SMAQMD Rule 202 and 452]
3. The VOC content of coatings used in the inside spray process must not exceed 420 grams/liter of coating (excluding water and exempt solvents) and 6.9 lb/gal of solids.
[Basis: SMAQMD Rule 202 and 452]

EQUIPMENT DESIGN, OPERATION AND MONITORING REQUIREMENTS:

4. The Drawn and Ironed can manufacturing facility must not exceed the following natural gas usage limits:
[Basis: SMAQMD Rules 201 and 202]

Equipment	Maximum Allowable Natural Gas Usage				
	Daily: cubic feet of natural gas/day				
	Quarterly: cubic feet of natural gas/quarter				
	Daily	Quarterly			
		1st Quarter	2nd Quarter	3rd Quarter	4th Quarter
Washcoat oven	70,000	6,090,000	4,900,000	5,250,000	6,160,000
Inside bake oven	186,000	16,182,000	13,020,000	13,950,000	16,368,000

V. EQUIPMENT SPECIFIC REQUIREMENTS:

(1) DRAWN AND IRONED CAN MANUFACTURING LINE

(2) WASHCOAT OVEN

(3) INSIDE BAKE OVEN

(4) THERMAL OXIDIZER

B. FEDERALLY ENFORCEABLE REQUIREMENTS –

5. The washcoat oven, inside bake oven and thermal oxidizer must only use natural gas fuel.
[Basis: SMAQMD Rules 201 and 202]
6. The washcoat oven (P/O 13712), inside bake oven (P/O 13713) and thermal oxidizer (P/O 22884) must **each** be equipped with a non-resetting natural gas fuel meter to ensure compliance with Condition No. 1 and Condition No. 4.
[Basis: SMAQMD Rules 201 and 202]
7. The VOC capture efficiency at the washcoat oven (P/O 13712), inside spray process (P/O 23454) and inside bake oven (P/O 13713) must be at least 90% (verified in the initial source test conducted on June 8-9, 1995 and August 24, 1995).
[Basis: SMAQMD Rules 201 and 202]
8. The washcoat oven (P/O 13712), inside spray process (P/O 23454) and inside bake oven (P/O 13713) must be vented through the thermal oxidizer (P/O 22884) except during periods of safety purging/shutdown.
[Basis: SMAQMD Rules 201 and 202]
9. VOC emissions from the washcoat oven (P/O 13712), inside spray process (P/O 23454) and inside bake oven (P/O 13713) that are vented through the thermal oxidizer (P/O 22884) must be destroyed by at least 95.0% by weight.
[Basis: SMAQMD Rules 201 and 202]
10. The Drawn and Ironed can manufacturing line (including the washcoat and inside bake ovens) must not operate unless the thermal oxidizer is fully operational and at a minimum operating temperature of 1,485°F.
[Basis: SMAQMD Rules 201 and 202, and 40 CFR 64]
11. The thermal oxidizer must be equipped with a temperature gauge to verify compliance with Condition No. 10.
[Basis: SMAQMD Rules 201 and 202, and 40 CFR 64]
12. The thermal oxidizer temperature gauge must be easily accessible, in good operating condition and calibrated at all times.
[Basis: SMAQMD Rules 201 and 202, and 40 CFR 64]

V. EQUIPMENT SPECIFIC REQUIREMENTS:

(1) DRAWN AND IRONED CAN MANUFACTURING LINE

(2) WASHCOAT OVEN

(3) INSIDE BAKE OVEN

(4) THERMAL OXIDIZER

B. FEDERALLY ENFORCEABLE REQUIREMENTS –

13. An excursion is deemed to occur when the thermal oxidizer temperature drops below 1,485°F and the Drawn and Ironed can manufacturing line continues to operate. Upon detecting any excursion the permit holder will investigate the excursion and take corrective action to minimize emissions and prevent recurrence of the excursion as expeditiously as practicable.

[Basis: SMAQMD Rules 201 and 202, and 40 CFR 64]

14. The permit holder must comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR 64.7.

[Basis: 40 CFR 64]

15. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR 64.7(d)(2), the permit holder must develop and implement the Quality Improvement Plan in accordance with 40 CFR 64.8.

[Basis: 40 CFR 64]

16. The permit holder must comply with the record keeping and reporting requirements of 40 CFR 64.9.

[Basis: 40 CFR 64]

17. No VOC containing material may be used for cleaning of the Drawn and Ironed can manufacturing line or any of its parts unless cleaned in a degreaser approved by the SMAQMD Air Pollution Control Officer. (Any non-vapor degreaser at the facility that uses solvent with a VOC content less than 25 grams/liter and maximum VOC emissions less than 2 lb/day is an approved degreaser)

[Basis: SMAQMD Rules 202 and 452]

18. The dust collector must be equipped with a pressure differential gauge to indicate the pressure drop across the filters and must be operated within the manufacturer's recommended pressure differential range.

[Basis: SMAQMD Rule 201 Section 405]

19. The dust collector must be in operation at all times during the operation of the thermal oxidizer.

[Basis: SMAQMD Rule 201 Section 405]

20. The dust collector cleaning frequency and duration must follow the manufacturer's recommendation.

[Basis: SMAQMD Rule 201 Section 405]

V. EQUIPMENT SPECIFIC REQUIREMENTS:

(1) DRAWN AND IRONED CAN MANUFACTURING LINE

(2) WASHCOAT OVEN

(3) INSIDE BAKE OVEN

(4) THERMAL OXIDIZER

B. FEDERALLY ENFORCEABLE REQUIREMENTS –

21. The materials collected from the dust collector must be discharged into a covered container and any transfer of this material must be performed in a manner preventing any fugitive emission.

[Basis: SMAQMD Rule 201 Section 405]

RECORD KEEPING AND REPORTING REQUIREMENTS:

22. The following record must be continuously maintained on site for the most recent five year period and must be made available to the SMAQMD Air Pollution Control Officer upon request. Quarterly records must be made available for inspection within 30 days of the end of the previous quarter.

[Basis: SMAQMD Rules 201 and 202, and 40 CFR 64]

Frequency	Information to be Recorded
Continuous	A. Thermal oxidizer operating temperature (degrees Fahrenheit) B. Records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan, any activities undertaken to implement a quality improvement plan, and other supporting information. [Basis: 40 CFR 64.9]
Daily	C. Types, quantities (gallons/day), and VOC content (grams/liter) of coatings used in the wash coat process and inside spray process. D. VOC emissions associated with the Drawn and Ironed can manufacturing line (fugitive and non-fugitive). (lb/day) E. Natural gas consumption of the washcoat oven and inside bake oven (cubic feet/day for each unit) F. No daily natural gas consumption records are required for the thermal oxidizer since emissions are based on operating at maximum capacity, 24 hours/day and the factors in Condition No. 1.
Quarterly	G. Types, quantities (gallons/quarter), and VOC content (grams/liter) of coatings used in the wash coat process and the inside spray process. H. VOC emissions associated with the Drawn and Ironed can manufacturing line (fugitive and non-fugitive). (lb/quarter) I. Natural gas consumption of the washcoat oven, inside bake oven, and thermal oxidizer. (cubic feet/quarter for each unit)

V. EQUIPMENT SPECIFIC REQUIREMENTS:

(1) DRAWN AND IRONED CAN MANUFACTURING LINE

(2) WASHCOAT OVEN

(3) INSIDE BAKE OVEN

(4) THERMAL OXIDIZER

B. FEDERALLY ENFORCEABLE REQUIREMENTS –

23. The following written reports must be submitted to the SMAQMD Air Pollution Control Officer.

[Basis: SMAQMD Rules 201, 202, and 452]

Frequency	Reports to be Submitted
Quarterly by: January 31 April 30 July 31 October 31	A. Types and amounts of coatings used. (gallons/quarter) B. Natural gas usage for the washcoat oven, inside bake oven and thermal oxidizer: 1. cubic feet/day for each unit 2. cubic feet/quarter for each unit C. VOC emissions associated with the Drawn and Ironed can manufacturing line (fugitive and non-fugitive): 1. lb/day 2. lb/quarter D. Total VOC emissions from non-fugitive controlled emissions from the Drawn and Ironed can manufacturing line combined with the VOC emissions from natural gas combustion in the washcoat oven, inside spray oven and thermal oxidizer based on the emission factors outlined in Condition No. 1. 1. lb/day 2. lb/quarter E. Total combined NOx and CO emissions from natural gas combustion in the washcoat oven, inside spray oven and thermal oxidizer based on the emission factors outlined in Condition No. 1: 1. lb/day 2. lb/quarter
Annually by January 31	F. Summary of annual HAP emissions to include: 1. Weight percent of each individual HAP in each coating used. 2. Emissions of each individual HAP. (tons/year) 3. Emissions of all HAPs combined. (tons/year) G. Operation and Maintenance Plan as described in Section 401 of Rule 452 Can Coating

V. EQUIPMENT SPECIFIC REQUIREMENTS:

- (1) DRAWN AND IRONED CAN MANUFACTURING LINE**
- (2) WASHCOAT OVEN**
- (3) INSIDE BAKE OVEN**
- (4) THERMAL OXIDIZER**

B. FEDERALLY ENFORCEABLE REQUIREMENTS –

24. The permit holder must, upon determination of applicability and written notification by the District, comply with all applicable requirements of the Air Toxics "Hot Spots" Information and Assessment Act (California Health and Safety Code Section 44300 et seq.)
[Basis: SMAQMD Rule 201, Section 303.1]

EMISSION TESTING REQUIREMENTS

25. An emission test for VOC destruction efficiency of the thermal oxidizer (P/O 22884) must be conducted each calendar year. The test must conform to the following time schedule:
[Basis: SMAQMD Rules 201 and 202]
- A. A source test plan must be submitted for SMAQMD approval at least 30 days prior to the proposed test date.
 - B. The SMAQMD must be given at least seven days notice of the actual time and date of each test so that a SMAQMD representative may observe the test.
 - C. The results of each test along with the actual operating parameters during the test must be submitted to the SMAQMD no later than 60 days following each test.
26. Capture efficiency, when the SMAQMD Air Pollution Control Officer requires such a test, must be determined by Bay Area Air Quality Management District, Manual of Procedures, Source Test Procedures ST-7, November 1, 1989 or EPA "Guidelines for Developing Capture Efficiency Protocols".
[Basis: SMAQMD Rules 201 and 202]

VI. INSIGNIFICANT EMISSIONS UNITS

The following systems are considered insignificant emissions units and are not subject to equipment-specific requirements. However, these units are required to comply with all applicable general requirements:

Equipment Description	Basis for Determination of Insignificant Emissions Unit is made based on SMAQMD "List and Criteria", Part B, Section 5 modified April 2001.
1. Uncoiler	<p><i>No Specific Source Category applies to these processes.</i> [Part B, Section 5, II]</p> <p><i>Meets General Criteria for Insignificant Activities.</i> Emits < 0.5 tons per year of a federal hazardous air pollutant (HAP) and no more than 2 tons per year of a regulated pollutant that is not a HAP. [Part B, Section 5, I]</p>
2. Lubricator	
3. Cupper	
4. Bodymakers	
5. Trimmers	
6. Washer	
7. Flanger	
8. Bearer	
9. Light Tester	<p><i>Meets Metal Products Specific Source Category Criteria.</i> Equipment is used exclusively for the inspection of metal products. [Part B, Section 5, II, S]</p>
10. Slitter	<p><i>No Specific Source Category applies to these processes.</i> [Part B, Section 5, II]</p> <p><i>Meets General Criteria for Insignificant Activities.</i> Emits < 0.5 tons per year of a federal hazardous air pollutant (HAP) and no more than 2 tons per year of a regulated pollutant that is not a HAP. [Part B, Section 5, I]</p>
11. Flanger	
12. Bearer	
13. Seamer	
14. Bodymaker No. 1	
15. Bodymaker No. 2	
16. Air Tester	<p><i>Meets Metal Products Specific Source Category Criteria.</i> Equipment is used exclusively for the inspection of metal products. [Part B, Section 5, II, S]</p>

VI. INSIGNIFICANT EMISSIONS UNITS

Equipment Description	Basis for Determination of Insignificant Emissions Unit is made based on SMAQMD "List and Criteria", Part B, Section 5 modified April 2001.
17. Forklifts	<i>No Specific Source Category applies to these processes. [Part B, Section 5, II]</i>
18. Vacuum Pumps	
19. Hot Water Heaters (electric)	<i>Meets General Criteria for Insignificant Activities. Emits < 0.5 tons per year of a federal hazardous air pollutant (HAP) and no more than 2 tons per year of a regulated pollutant that is not a HAP. [Part B, Section 5, I]</i>
20. Air Conditioning System	
21. Building Ventilation	
22. Ventilation Heat Tunnels	
23. Laboratory Equipment	
24. Air Flow Cleaners	<i>No Specific Source Category applies to these processes. [Part B, Section 5, II]</i>
25. Lubrication Stations	
26. Battery Usage/Charging	<i>Meets General Criteria for Insignificant Activities. Emits < 0.5 tons per year of a federal hazardous air pollutant (HAP) and no more than 2 tons per year of a regulated pollutant that is not a HAP. [Part B, Section 5, I]</i>
27. Maintenance Welding Hoods	<i>Meets Brazing, Soldering, Welding, and Cutting Torches Specific Source Category Criteria. Welding equipment is used for maintenance, as part of the manufacturing process, which is included on the U.S. EPA List of Trivial Activities and the total HAP potential to emit is less than 0.5 tons per year. [Part B, Section 5, II, Q]</i>
28. D and I Washcoat Tank	<i>Meets Storage Containers, Reservoirs, and Tanks – General Organic and VOC-containing Material Specific Source Category Criteria. Vapor pressure < 0.1 psi as determined by ASTM test method D-2879-86. [Part B, Section 5, II, H, 1, b]</i>

VI. INSIGNIFICANT EMISSIONS UNITS

Equipment Description	Basis for Determination of Insignificant Emissions Unit is made based on SMAQMD "List and Criteria", Part B, Section 5 modified April 2001.
29.D and I Enamel Tank	<p><i>No Specific Source Category applies to this process.</i> [Part B, Section 5, II]</p> <p><i>Meets General Criteria for Insignificant Activities.</i> Emits < 0.5 tons per year of a federal hazardous air pollutant (HAP) and no more than 2 tons per year of a regulated pollutant that is not a HAP. [Part B, Section 5, I]</p>
30.D and I Inside Enamel Tank	<p><i>Meets Storage Containers, Reservoirs, and Tanks – General Organic and VOC-containing Material Specific Source Category Criteria.</i> Capacity < 6,077 gallons and vapor pressure < 1.5 psi as determined by ASTM test method D-2879-86. [Part B, Section 5, II, H, 3]</p>
31.Cooling Tower, HVAC	<p><i>Meets Cooling Tower Specific Source Category Criteria.</i> Has a circulation rate of less than 10,000 gallons per minute, and is not used to cool process water, water from barometric jets, or water from barometric condensers. [Part B, Section 5, II, C]</p>
32.Cooling Tower, Air Compressor	
33.Degreasers, Exempt Solvent	<p><i>No Specific Source Category applies to this process.</i> [Part B, Section 5, II]</p> <p><i>Meets General Criteria for Insignificant Activities.</i> Emits < 0.5 tons per year of a federal hazardous air pollutant (HAP) and no more than 2 tons per year of a regulated pollutant that is not a HAP. [Part B, Section 5, I]</p>
34.Can Coding (6) Videojet Printers	
35.Can Coding (8) Dotjet Printers	
36. Side Seam Powder Coating	

ACRONYMS, ABBREVIATIONS AND UNITS OF MEASURE

Acronyms, abbreviations and units of measure used in this permit are defined as follows:

ASTM

American Society for Testing and Materials

BACT

Best Available Control Technology.

CAA

The federal Clean Air Act.

CARB

California Air Resources Board.

CFC

Chloro-fluoro-carbons. A class of compounds responsible for destroying ozone in the upper atmosphere.

CFR

The Code of Federal Regulations. 40 CFR contains the implementing regulations for federal environmental statutes such as the Clean Air Act. Parts 50-99 of 40 CFR contain the requirements for air pollution programs.

CO

Carbon monoxide.

CO₂

Carbon dioxide.

ERC

Emission reduction credit.

Federally Enforceable

All limitations and conditions which are enforceable by the Administrator of the U.S. EPA including those requirements developed pursuant to 40 CFR Part 51, Subpart I (NSR), Part 52.21 (PSD), Part 60 (NSPS), Part 61 (NESHAPs), Part 63 (HAP) and Part 72 (Permits Regulation, Acid Rain) including limitations and conditions contained in operating permits issued under a U.S. EPA approved program that has been incorporated into the California SIP.

NESHAP

National Emission Standards for Hazardous Air Pollutants (see 40 CFR Parts 61 and 63).

NO_x

Nitrogen oxides.

ACRONYMS, ABBREVIATIONS AND UNITS OF MEASURE

NSPS

New Source Performance Standards. U.S. EPA standards for emissions from new stationary sources. Mandated by Title I, Section 111 of the federal Clean Air Act and implemented by 40 CFR Part 60 and SMAQMD Regulation 8.

NSR

New Source Review. A federal program for pre-construction review and permitting of new and modified sources of pollutants for which criteria have been established in accordance with Section 108 of the Federal Clean Air Act. Mandated by Title I of the federal Clean Air Act and implemented by 40 CFR Parts 51 and 52 and SMAQMD Rule 202. (Note: There are additional NSR requirements mandated by the California Clean Air Act.)

O₂

Oxygen.

Offset Requirement

A New Source Review requirement to provide federally enforceable emission offsets for the emissions from a new or modified source. Applies to emissions of ROC, NO_x, SO₂ and PM₁₀.

PM

Particulate matter.

PM₁₀

Particulate matter with aerodynamic equivalent diameter of less than or equal to 10 microns.

PM_{2.5}

Particulate matter with aerodynamic equivalent diameter of less than or equal to 2.5 microns.

PSD

Prevention of Significant Deterioration. A federal program for permitting new and modified sources of those air pollutants for which the SMAQMD is classified "attainment" of the National Air Ambient Quality Standards. Mandated by Title I of the federal Clean Air Act and implemented by 40 CFR Part 52.

ROC

Reactive organic compounds.

SIP

State Implementation Plan. CARB and SMAQMD programs and regulations approved by U.S. EPA and developed in order to attain the National Air Ambient Quality Standards. Mandated by Title I of the federal Clean Air Act.

SMAQMD

Sacramento Metropolitan Air Quality Management District.

SO₂

Sulfur dioxide.

ACRONYMS, ABBREVIATIONS AND UNITS OF MEASURE

Title V

Title V of the federal Clean Air Act. Title V requires the SMAQMD to operate a federally enforceable operating permit program for major stationary sources and other specified sources.

TSP

Total suspended particulate.

U.S. EPA

The federal Environmental Protection Agency.

VOC

Volatile Organic Compounds.

UNITS OF MEASURE:

BTU	=	British Thermal Unit
cfm	=	cubic feet per minute
cm	=	centimeter
g	=	grams
gal	=	gallon
gpm	=	gallons per minute
hp	=	horsepower
hr	=	hour
lb	=	pound
in	=	inch
kg	=	kilogram
max	=	maximum
m ²	=	square meter
min	=	minute
mm	=	millimeter
MM	=	million
ppmv	=	parts per million by volume
ppmw	=	parts per million by weight
psia	=	pounds per square inch, absolute
psig	=	pounds per square inch, gauge
quarter	=	calendar quarter
RVP	=	Reid vapor pressure
scfm	=	standard cubic feet per minute
yr	=	year