Ms. Deborah Jordan Director of Air Management Division **United States Environmental Protection Agency** 75 Hawthorne Street San Francisco, CA 94105

RE: Application #14513 Plant #A0273, Pechiney Plastics Packaging, Inc.

ALAMEDA COUNTY Tom Bates Scott Haggerty Janet Lockhart Nate Miley

CONTRA COSTA COUNTY John Gioia Mark Ross Michael Shimansky Gayle B. Uilkema

MARIN COUNTY Harold C. Brown, Jr.

NAPA COUNTY Brad Wagenknecht (Secretary)

SAN FRANCISCO COUNTY Chris Daly Jake McGoldrick Gavin Newsom

SAN MATEO COUNTY Jerry Hill (Chair) Carol Klatt

SANTA CLARA COUNTY Erin Garner Yoriko Kishimoto Liz Kniss

> SOLANO COUNTY John F. Silva

> SONOMA COUNTY Tim Smith Pamela Torliatt (Vice-Chair)

Jack P. Broadbent EXECUTIVE OFFICER/APCO

JPB:PJL

Dear Ms. Jordan:

The is to inform you that we are cancelling the Major Facility Review (Title V) permit for Pechiney Plastics Packaging, Inc.

The District issued a Title V permit to this facility on November 6, 2001 because it was a potential major source of volatile organic compounds (VOCs). On April 14, 2006, the facility submitted a synthetic minor permit application because 1) the plant's actual annual emissions levels, post-capture and control, are well below the Title V permitting thresholds and 2) Pechiney has since installed a 'permanent total enclosure' around the majority of the VOC sources, which captures the VOC exhaust and routes it to one of three abatement devices (two catalytic oxidizers and one thermal oxidizer) for destruction. Emissions of VOCs are abated to levels well below the Title V threshold. The facility will accept permit conditions that limit its potential to emit VOCs to 95 tpy. A facility that is physically capable of emitting pollutants above the Major Facility threshold, but which is limited by permit conditions to lower emissions, is a Synthetic Minor Facility pursuant to Regulation 2-6-423.2.

The District has reviewed the proposal, has determined that it is adequate to keep the emissions below the major source thresholds, and therefore is issuing a synthetic minor permit. A copy of the synthetic minor permit will be sent to you under a separate cover.

The District will also notify the California Air Resources Board and the facility of this permit action in writing.

If you have any questions on this matter, please call Pamela Leong, Air Quality Engineer II, at (415) 749-5186.

Very truly yours,

Signed by Jeff McKay for Jack P. Broadbent Jack P. Broadbent Executive Officer/APCO

 $H:\label{eq:loss} H:\label{eq:loss} H:\label{e$