

Bay Area Air Quality Management District

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**Permit Evaluation
and
Statement of Basis
for
RENEWAL of**

MAJOR FACILITY REVIEW PERMIT

**for
Rexam Beverage Can Company
Facility #A1665**

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Application: 8913

TABLE OF CONTENTS

A.	Background	3
B.	Facility Description	4
C.	Permit Content.....	4
I.	Standard Conditions.....	4
II.	Equipment	5
III.	Generally Applicable Requirements	6
IV.	Source-Specific Applicable Requirements	7
V.	Schedule of Compliance	8
VI.	Permit Conditions	9
VII.	Applicable Limits and Compliance Monitoring Requirements	10
VIII.	Test Methods.....	12
D.	Alternate Operating Scenario:	12
E.	Compliance Status:.....	13
F.	Differences Between the Application and the Proposed Permit:	13

Title V Statement of Basis

A. Background

Rexam Beverage Can Company (Rexam; formerly American National Can Company) received its initial Title V permit on July 28, 1999. This application is for a permit renewal. Although the current permit expired on July 28, 2004, it continues in force until the District takes final action on the renewal permit. Rexam is subject to the Operating Permit requirements of Title V of the federal Clean Air Act, Part 70 of Title 40 of the Code of Federal Regulations (CFR), and BAAQMD Regulation 2, Rule 6, Major Facility Review because it had the “potential to emit” 10 tons or more per year of “glycol ethers”, a class of organic compounds listed as hazardous air pollutants (HAPs) in Section 112(b) of the Clean Air Act. Glycol ethers make up a substantial portion of the organic solvent used in the beverage can coatings applied at this facility.

Approximately 98 percent of all glycol ethers used at Rexam is in the form of Ethylene Glycol Monobutyl Ether (EGBE) (2-Butoxyethanol) (CAS No. 111-76-2). On November 21, 2003, the EPA proposed to remove EGBE from the group of glycol ethers listed as HAPs. On November 29, 2004 this proposal was made final. Based on this action, Rexam may choose to leave the Title V program by accepting a Synthetic Minor Operating Permit from the BAAQMD. At this time however, Rexam is still under the Title V permitting program.

Major Facility Operating permits (Title V permits) must meet specifications contained in 40 CFR Part 70 as contained in BAAQMD Regulation 2, Rule 6. The permits must contain all applicable requirements (as defined in BAAQMD Regulation 2-6-202), monitoring requirements, recordkeeping requirements, and reporting requirements. The permit holders must submit reports of all monitoring at least every six months and compliance certifications at least every year.

In the Bay Area, state and District requirements are also applicable requirements and are included in the permit. These requirements can be federally enforceable or non-federally enforceable. All applicable requirements are contained in Sections I through VI of the permit.

Each facility in the Bay Area is assigned a facility site identifier that consists of a letter and a 4-digit number. This identifier is also considered to be the identifier for the permit. The identifier for this facility is A1665.

Rexam has increased their can making capacity by adding one additional cupping press and bodymaker/trimmer to their production line. This equipment is exempt from permitting by BAAQMD Regulation 2-1-121.13 and the increased can capacity does not affect the current facility VOC emissions limit of 39.2 tons/yr. The equipment capacities given in Table II-A have been adjusted to reflect the increased production capacity. In addition, the District has made updates and corrections to the permit as appropriate to update the text to the current standards and to correct outdated or erroneous information. All permit revisions are clearly shown in ~~strikeout~~ and underline formatting in the proposed renewal permit.

B. Facility Description

Rexam Beverage Can Company is engaged solely in the manufacture of two-piece aluminum beverage cans. Sheet aluminum is uncoiled and fed into a cupper which stamps the metal into cups 3” in diameter by 2.5” tall. The “cups” are then sent to a bodymaker where they are drawn and ironed to the desired can height. At this point, the tops of the cans are trimmed to provide a smooth surface for attaching the top of the can.

The permitted equipment at the facility consists of various coating application lines, bake ovens, coating storage tanks, a scrap collection system, and a lime silo, which stores lime used in the can washing process. The aluminum can extrusion and shaping operations are exempt from permitting. VOC emissions from all coating operations are abated by a direct flame afterburner.

C. Permit Content

The legal and factual basis for the permit follows. The permit sections are described in the order that they are presented in the permit. Changes to the standard permit text have been made since the initial Title V Permit for this site was issued. These changes are reflected in the new proposed permit in strikeout/underline format.

I. Standard Conditions

This section contains administrative requirements and conditions that apply to all facilities. Many of these conditions derive from 40 CFR § 70.6, Permit Content, which dictates certain standard conditions that must be placed in the permit. The language that the District has developed for many of these requirements has been adopted into the BAAQMD Manual of Procedures, Volume II, Part 3, Section 4, and therefore must appear in the permit. If the Title IV (Acid Rain) requirements for certain fossil-fuel fired electrical generating facilities or the accidental release (40 CFR § 68) programs apply, the section will contain a standard condition pertaining to these programs. This permit does not include Title IV or accidental release provisions.

The standard conditions also contain references to BAAQMD Regulation 1 and Regulation 2. These are the District’s General Provisions and Permitting rules.

Changes to permit:

- The dates of adoption and approval of rules in Standard Condition 1.A have been updated.
- SIP Regulation 2, Rule 4 - Permits, Emissions Banking and BAAQMD Regulation 2, Rule 6 - Permits, Major Facility Review have been added to Standard Condition 1.A.
- The following language was added to Standard Condition I.B: "If the permit renewal has not been issued by [], but a complete application for renewal has been submitted in accordance with the above deadlines, the existing permit will continue in force until the District takes final action on the renewal application." This is the "application shield" pursuant to BAAQMD Regulation 2-6-407.
- Standard Condition I.B.11, which requires the responsible official to certify all documents submitted, was added to conform to changes in Regulation 2, Rule 6.
- Standard Condition I.E.1 requiring the permit holder to provide any information, records, and reports requested or specified by the APCO, was added because it was inadvertently omitted in the initial permit.

- The reference to Regulation 3 “Fees” was removed from the regulatory basis in Standard Conditions E “Records” and F “Monitoring Reports”. BAAQMD Regulation 3 does not form a fundamental basis for these requirements.
- The dates of the reporting periods and reporting deadlines have been added to Standard Conditions I.F and I.G for additional clarity.
- The first sentence of Standard Condition I.F has been changed from " All required monitoring reports must be submitted to the District at least once every six months." to " Reports of all required monitoring must be submitted to the District at least once every six months, except where an applicable requirement specifies more frequent reporting. " to conform more closely to BAAQMD Regulation 2-6-409.18.
- Standard Condition I.H was modified to conform to the current standard.
- Standard Condition I.J has been added to clarify that the capacity limits shown in Table II-A are enforceable limits.

Standard text has been updated for clarification and to reflect the current District policy. Notable changes include a statement added to Condition I.B.1 that explains the District’s policy on the applicability of the existing Title V permit during the renewal process and Condition I.J has been added to clarify that the capacity limits shown in Table II-A are enforceable limits.

II. Equipment

This section of the permit lists all permitted or significant sources. Each source is identified by an S and a number (e.g., S-1).

Permitted sources are those sources that require a BAAQMD operating permit pursuant to BAAQMD Rule 2-1-302. There are 17 permitted sources.

Significant sources are those sources that have a potential to emit of more than 2 tons of a “regulated air pollutant,” as defined in BAAQMD Rule 2-6-222, per year or 400 pounds of a “hazardous air pollutant,” as defined in BAAQMD Rule 2-6-210, per year. There are no significant sources.

The permit lists all abatement (control) devices that control permitted or significant sources at the facility. Each abatement device whose primary function is to reduce emissions is identified by an A and a number (e.g., A-2). An abatement device may also be a source (such as a thermal oxidizer that burns fuel) of secondary emissions. If the primary function of a device is to control emissions, it is considered an abatement (or “A”) device. If the primary function of a device is a non-control function, the device is considered to be a source (or “S”).

The equipment section is considered to be part of the facility description. It contains information that is necessary for applicability determinations, such as fuel types, contents or sizes of tanks, etc. This information is part of the factual basis of the permit.

Each of the permitted sources has previously been issued a permit to operate pursuant to the requirements of BAAQMD Regulation 2, Permits. These permits are issued in accordance with state law and the District’s regulations. The capacities in the permitted sources table are the maximum allowable capacities for each source, pursuant to Standard Condition I.J and Regulation 2-1-403.

Changes to permit:

The Capacity limits for sources in Coating Lines #1 and #2 in Table II-A were changed to reflect the addition of one additional cupping press and bodymaker/trimmer to the existing process line. The new equipment is exempt, so it is not included in the permit. The increased capacity limits at the existing sources do not affect the current emission limit for the facility.

III. Generally Applicable Requirements

This section of the permit lists requirements that generally apply to all sources at a facility including insignificant sources and portable equipment that may not require a District permit. If a generally applicable requirement applies specifically to a source that is permitted or significant, the standard will also appear in Section IV and the monitoring for that requirement will appear in Sections IV and VII of the permit. Parts of this section apply to all facilities (e.g., particulate, architectural coating, odorous substance, and sandblasting standards). In addition, standards that apply to insignificant or unpermitted sources at a facility (e.g., refrigeration units that use more than 50 pounds of an ozone-depleting compound) are placed in this section.

Changes to permit:

- Language has been added to Section III to clarify that this section contains requirements that may apply to temporary sources. This provision allows contractors that have "portable" equipment permits that require them to comply with all applicable requirements to work at the facility on a temporary basis, even if the permit does not specifically list the temporary source. Examples are temporary sand-blasting or soil-vapor extraction equipment.
- Section III has been modified to say that SIP standards are now found on EPA's website and are not included as part of the permit.
- The note regarding SIP information from the Rule Development Section has been deleted since the SIP standards are now found on EPA's website.
- Table III has been updated to add rules and standards to conform to current practice. In addition, generally applicable requirements that were overlooked in the initial Title V permit were added. For example, the current BAAQMD version of Regulation 8, Rule 16 was added because Rexam may engage in solvent cleaning operations that are subject to these requirements but are not included as permitted sources in the Title V permit. The following rules and standards were added to Table III:

- BAAQMD Regulation 2, Rule 1, General Requirements
- BAAQMD Regulation 2-1-429, Federal Emissions Statement
- SIP Regulation 2, Rule 1, General Requirements
- SIP Regulation 5, Open Burning
- BAAQMD Regulation 8, Rule 2, Miscellaneous Operations
- BAAQMD Regulation 8, Rule 4, General Solvent and Surface Coating Operations
- BAAQMD Regulation 8, Rule 16, Solvent Cleaning Operations
- SIP Regulation 8, Rule 51, Adhesive and Sealant Products
- BAAQMD Regulation 11, Rule 1, Lead
- SIP Regulation 11, Rule 1, Lead
- SIP Regulation 12, Rule 4, Sandblasting
- California Health and Safety Code Section 41750 et seq., Portable Equipment
- California Health and Safety Code Section 44300 et seq., Air Toxics "Hot Spots"
- Information and Assessment Act of 1987

40 CFR Part 61, Subpart A, National Emission Standards for Hazardous Air Pollutants – General Provisions

- The dates of adoption or approval of the rules and their "federal enforceability" status in Table III have also been updated.

IV. Source-Specific Applicable Requirements

This section of the permit lists the applicable requirements that apply to permitted or significant sources. These applicable requirements are contained in tables that pertain to one or more sources that have the same requirements. The order of the requirements is:

1. District Rules
2. SIP Rules (if any) are listed following the corresponding District rules. SIP rules are District rules that have been approved by EPA for inclusion in the California State Implementation Plan. SIP rules are "federally enforceable" and a "Y" (yes) indication will appear in the "Federally Enforceable" column. If the SIP rule is the current District rule, separate citation of the SIP rule is not necessary and the "Federally Enforceable" column will have a "Y" for "yes". If the SIP rule is not the current District rule, the SIP rule or the necessary portion of the SIP rule is cited separately after the District rule. The SIP portion will be federally enforceable; the non-SIP version will not be federally enforceable, unless EPA has approved it through another program.
3. Other District requirements, such as the Manual of Procedures, as appropriate.
4. Federal requirements (other than SIP provisions)
5. BAAQMD permit conditions. The text of BAAQMD permit conditions is found in Section VI of the permit.
6. Federal permit conditions. The text of Federal permit conditions, if any, is found in Section VI of the permit.

Section IV of the permit contains citations to all of the applicable requirements. The text of the requirements is found in the regulations, which are readily available on the District's or EPA's websites, or in the permit conditions, which are found in Section VI of the permit. All monitoring requirements are cited in Section IV. Section VII is a cross-reference between the limits and monitoring requirements. A discussion of monitoring is included in Section C.VII of this permit evaluation/statement of basis.

Complex Applicability Determinations

NESHAP Requirements:

The National Emissions Standards for Hazardous Air Pollutants (NESHAP) for the "Surface Coating of Metal Cans" was adopted on 11/13/03. It applies to all metal can coating facilities that emit or have the potential to emit any single hazardous air pollutant (HAP) at a rate of 10 tons or more per year or any combination of HAPs at a rate of 25 tons or more per year.

As previously discussed, the EPA removed Ethylene Glycol Monobutyl Ether from the list of HAPs on November 29, 2004. Therefore, Rexam is no longer a major source of HAPs so they are not subject to the NESHAP.

Removal of Existing Requirements

BAAQMD Regulation 8-11-302 (the use of an abatement device with a VOC removal efficiency of 90% or greater) is an alternative to complying with the VOC limits of BAAQMD Regulation 8-11-301. Therefore, if one of them applies, the other does not. The VOC emissions from all coating sources at this facility are either directly or indirectly (via the coating ovens in the case of the Roller Coaters S-1 and S-7) abated by the Direct Flame Afterburner A-1 and comply with 8-11-302. Because the operation of A-1 is required by Permit Condition #391 during all periods of operation, there is no option of switching to compliance with the 8-11-301 VOC limits as an alternative. Therefore, BAAQMD Regulation 8-11-301 does not apply to the coating sources at this facility.

None of the coating sources are subject to the Alternative Emission Control Plan requirements of BAAQMD Regulation 8-11-305 because no such plan was ever requested by Rexam or their predecessor American National Can and no such plan has been approved by the District..

Changes to permit:

- The applicable parametric monitoring requirements from BAAQMD Regulation 1 and SIP Regulation were added to Tables IV A through IV F, because these sources are required to monitor vacuum pressure, temperature, or both.
- BAAQMD Regulation 6-311 “Process Weight Rate Emissions Limitations” was added to Tables IV H and IV I for the Scrap Collection System S-16 and the Lime Silo S-17. This was done to correct a previous oversight.
- New BAAQMD Regulation 8, Rule 5 “Storage of Organic Liquids” requirements were added to Table IV G for the Storage Tanks S-13, S-14, and S-15 to reflect recent changes to the regulation. The outdated requirements were removed.
- BAAQMD Regulation 8-11-301 and 8-11-305 requirements were removed for all coating sources (Tables IV A through IV F) as discussed above.
- The NESHAP requirements for the “Surface Coating of Metal Cans” 40 CFR 63, Subpart KKKK and “General Requirements” 40 CFR 63, Subpart A were added as future effective requirements.

V. Schedule of Compliance

A schedule of compliance is required in all Title V permits pursuant to BAAQMD Regulation 2-6-409.10 which provides that a major facility review permit shall contain the following information and provisions:

“409.10 A schedule of compliance containing the following elements:

- 10.1 A statement that the facility shall continue to comply with all applicable requirements with which it is currently in compliance;
- 10.2 A statement that the facility shall meet all applicable requirements on a timely basis as requirements become effective during the permit term; and

- 10.3 If the facility is out of compliance with an applicable requirement at the time of issuance, revision, or reopening, the schedule of compliance shall contain a plan by which the facility will achieve compliance. The plan shall contain deadlines for each item in the plan. The schedule of compliance shall also contain a requirement for submission of progress reports by the facility at least every six months. The progress reports shall contain the dates by which each item in the plan was achieved and an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.”

Since the District has not determined that the facility is out of compliance with an applicable requirement, the schedule of compliance for this permit contains only sections 2-6-409.10.1 and 2-6-409.10.2.

Changes to permit:

A minor change was made to this section to reflect the standard text used by the District.

VI. Permit Conditions

During the Title V permit development, the District has reviewed the existing permit conditions, deleted the obsolete conditions, and, as appropriate, revised the conditions for clarity and enforceability. Each permit condition is identified with a unique numerical identifier, up to five digits.

When necessary to meet Title V requirements, additional monitoring, recordkeeping, or reporting has been added to the permit.

All changes to existing permit conditions are clearly shown in “strike-out/underline” format in the proposed permit. When the permit is issued, all “strike-out” language will be deleted; all “underline” language will be retained, subject to consideration of comments received.

The existing permit conditions are derived from previously issued District Authorities to Construct (A/C) or Permits to Operate (P/O). Permit conditions may also be imposed or revised as part of the annual review of the facility by the District pursuant to California Health and Safety Code (H&SC) § 42301(e), through a variance pursuant to H&SC § 42350 *et seq.*, an order of abatement pursuant to H&SC § 42450 *et seq.*, or as an administrative revision initiated by District staff. After issuance of the Title V permit, permit conditions will be revised using the procedures in Regulation 2, Rule 6, Major Facility Review.

The regulatory basis is listed following each condition. The regulatory basis may be a rule or regulation. The District is also using the following terms for regulatory basis:

BACT: This term is used for a condition imposed by the Air Pollution Control Officer (APCO) to ensure compliance with the Best Available Control Technology in Regulation 2-2-301.

Cumulative Increase: This term is used for a condition imposed by the APCO that limits a source’s operation to the operation described in the permit application pursuant to BAAQMD Regulation 2-1-403.

Offsets: This term is used for a condition imposed by the APCO to ensure compliance with the use of offsets for the permitting of a source or with the banking of emissions from a source pursuant to Regulation 2, Rules 2 and 4.

PSD: This term is used for a condition imposed by the APCO to ensure compliance with a Prevention of Significant Deterioration permit issued pursuant to Regulation 2, Rule 2.

TRMP: This term is used for a condition imposed by the APCO to ensure compliance with limits that arise from the District's Toxic Risk Management Policy.

Changes to permit:

- HAP emissions limits were added to Permit Condition #391, part 1 in order to demonstrate that Rexam is not a major source of HAPs and are not subject to the NESHAP for Surface Coating of Metal Cans (40 CFR 63, Subpart KKKK).
- The existing Recordkeeping And Reporting section of Permit Condition #391 (part 12) was replaced with a new set of recordkeeping conditions specifically intended to monitor VOC and HAP emissions from Coating Lines 1 and 2 on an ongoing basis.

VII. Applicable Limits and Compliance Monitoring Requirements

This section of the permit is a summary of numerical limits and related monitoring requirements for each source. The summary includes a citation for each monitoring requirement, frequency of monitoring, and type of monitoring. The applicable requirements for monitoring are completely contained in Sections IV, Source-Specific Applicable Requirements, and VI, Permit Conditions, of the permit.

Monitoring decisions are typically the result of a balancing of several different factors including: 1) the likelihood of a violation given the characteristics of normal operation, 2) degree of variability in the operation and in the control device, if there is one, 3) the potential severity of impact of an undetected violation, 4) the technical feasibility and probative value of indicator monitoring, 5) the economic feasibility of indicator monitoring, and 6) whether there is some other factor, such as a different regulatory restriction applicable to the same operation, that also provides some assurance of compliance with the limit in question.

These factors are the same as those historically applied by the District in developing monitoring for applicable requirements. It follows that, although Title V calls for a re-examination of all monitoring, there is a presumption that these factors have been appropriately balanced and incorporated in the District's prior rule development and/or permit issuance. It is possible that, where a rule or permit requirement has historically had no monitoring associated with it, no monitoring may still be appropriate in the Title V permit if, for instance, there is little likelihood of a violation. Compliance behavior and associated costs of compliance are determined in part by the frequency and nature of associated monitoring requirements. As a result, the District will generally revise the nature or frequency of monitoring only when it can support a conclusion that existing monitoring is inadequate.

The following requirements in the Title V permit do not currently require monitoring:

PM Sources

S# & Description	Emission Limit Citation	Federally Enforceable Emission Limit	Monitoring
SCRAP COLLECTION SYSTEM: S-16	BAAQMD Regulation 6-301	Ringelmann 1.0	None
	BAAQMD Regulation 6-310	0.15 gr/dscf	None
	BAAQMD Regulation 6-311	2.7 pounds/hour, for Process Weight Rate (P) 1,000 pounds/hour	None
LIME SILO: S-17	BAAQMD Regulation 6-310	0.15 gr/dscf	None
	BAAQMD Regulation 6-311	2.7 pounds/hour, for Process Weight Rate (P) 1,000 pounds/hour	None

PM Monitoring Discussion:

Scrap Collection System S-16: The waste aluminum trimmed from the tops of the cans is sent to the Scrap Collection System S-16 where the scrap is collected in a cyclone.

Particulate emissions from S-16 are in the form of oil mist (from oil used in the drawing process) and water vapor (from cooling). Any oil mist or water vapor that leaves the cyclone (A-6) is subsequently captured by the oil mist collector (A-7), a single stage electrostatic precipitator. Unabated oil mist emissions are conservatively estimated to be 1 pound per ton of aluminum scrap. The facility estimates that the maximum aluminum scrap throughput at S-16 is 4,400 tons per year. Therefore, the highest unabated oil mist emissions would be 4,400 lb/yr (2.2 tons/yr). The Oil Mist Collector A-7 has a collection efficiency of 95% (manufacturers specification), so the highest actual oil mist emissions from S-16 should be 220 lb/yr (0.11 tons/yr). In reality, oil mist emissions are assumed to be negligible.

Lime Silo S-17: Beverage cans are washed in a caustic lime solution prior to coating and finishing. Rexam has a lime usage rate of 20 lb/hour (0.24 tons/day), the Lime Silo S-17 has a capacity of 10 tons. Therefore, at the maximum continuous lime usage rate, the silo must be refilled once every 41.7 days (about 9 times per year). The silo is filled at a rate of 16,000 lb/hr, taking 1.25 hours to fill. This silo only has a potential to emit while it is being filled.

From AP-42 Table 11.12-2, an uncontrolled PM factor of 0.27 lb/ton is given for “cement unloading to elevated storage silo”. Based on the maximum fill rate of the silo, the highest uncontrolled emissions from S-17 would be 2.2 lb/hr (2.7 lb per silo fill). Assuming a typical (conservative) baghouse abatement efficiency of 95%, actual PM10 emissions will be 0.14 lb/silo fill or 1.2 lb/yr (<0.001 tons/yr).

Conclusion: Based on the insignificant particulate emissions associated with the Scrap Handling Operation S-16 and the Lime Silo S-17 as demonstrated above, periodic monitoring for the above Regulation 6 limits is not recommended for either of these sources.

Changes to permit:

- As discussed above in Section VI “Permit Conditions”, Permit Condition #391 was modified to bolster the monitoring requirements necessary to demonstrate compliance with the 39.2 tons per year VOC emissions limit for the facility. The new condition text also establishes HAP emission limits and monitoring requirements to demonstrate that the facility is not subject to the NESHAP for “Surface Coating of Metal Cans”, 40 CFR 63, Subpart KKKK. The new HAP limits and VOC and HAP monitoring requirements were added to Tables VII B through VII F
- The applicable parametric monitoring requirements from BAAQMD Regulation 1 and SIP Regulation were added to Tables VII B through VII F for the reasons discussed above in the Applicable Requirements section (Section IV).
- The requirements for BAAQMD Regulation 6-311 were added to Tables VII G and VII H for the Scrap Collection System S-16 and the Lime Silo S-17. These requirements were inadvertently omitted in the initial permit.
- References to BAAQMD Regulations 8-11-301 and 8-11-305 were removed as discussed above in the Applicable Requirements section (Section IV).

VIII. Test Methods

This section of the permit lists test methods that are associated with standards in District or other rules. It is included only for reference. In most cases, the test methods in the rules are source test methods that can be used to determine compliance but are not required on an ongoing basis. The test methods are not applicable requirements unless a rule or permit condition requires ongoing testing, in which case the requirement will also appear in Section IV of the permit.

Changes to permit:

- The test method for BAAQMD Regulation 6-311 was added.
- All Regulation 8-11-301 test methods were deleted because it was determined that there are no Regulation 8-11-301 VOC limits, because a control device is required as a condition of the permit to operate.

D. Alternate Operating Scenarios:

Rexam has expressed the need for operational flexibility in order to respond to customer demands. Potential operational changes may include: changing raw materials (coatings, inks, and solvents) to equivalent materials that are also in compliance with all applicable requirements, changing the contents of storage tanks, making minor changes to line speed, and updating production processes, all of which will not increase the potential to emit for the facility.

The types of operational changes suggested by Rexam do not violate the current terms of the Title V permit and do not require that alternate operating scenarios be included.

E. Compliance Status:

A January 7, 2005 office memorandum from the Director of Compliance and Enforcement, to the Director of Permit Services, presents a review of the compliance record of Rexam Beverage Can Company (Site #: A1665). The Compliance and Enforcement Division staff has reviewed the records for Rexam for the period between December 31, 2003 through December 31, 2004. This review was initiated as part of the District evaluation of Rexam's application for a renewal Title V permit. During the period subject to review, activities known to the District include:

- One violation occurred during this period. The violation was for not meeting the required minimum temperature limit for the Afterburner A-1. The required temperature was achieved and the equipment was back in compliance on the same day.
- The District did not receive any alleged complaints.
- The facility is not operating under a Variance or an Order of Abatement from the District Board.
- There were no monitor excesses or equipment breakdowns reported or documented by District staff.

The BAAQMD Compliance and Enforcement Division has stated that ongoing compliance for this facility can be reasonably assured based on their past compliance record.

F. Differences between the Application and the Proposed Permit:

The renewal Title V permit application was submitted on January 20, 2004. This version is the basis for constructing the proposed Title V permit. All differences between the renewal Title V application and the proposed permit have been discussed in this Statement of Basis.

APPENDIX A
BAAQMD COMPLIANCE REPORT

APPENDIX B
GLOSSARY

ACT

Federal Clean Air Act

APCO

Air Pollution Control Officer

API

American Petroleum Institute

ARB

Air Resources Board

BAAQMD

Bay Area Air Quality Management District

BACT

Best Available Control Technology

BARCT

Best Available Retrofit Control Technology

C5

An Organic chemical compound with five carbon atoms

C6

An Organic chemical compound with six carbon atoms

CAA

The federal Clean Air Act

CAAQS

California Ambient Air Quality Standards

CAPCOA

California Air Pollution Control Officers Association

CEC

California Energy Commission

CEQA

California Environmental Quality Act

CEM

A "continuous emission monitor" is a monitoring device that provides a continuous direct measurement of some pollutant (e.g. NOx concentration) in an exhaust stream.

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

Cumulative Increase

The sum of permitted emissions from each new or modified source since a specified date. Used to determine whether threshold-based requirements are triggered.

District

The Bay Area Air Quality Management District

dscf

Dry Standard Cubic Feet

dscm

Dry Standard Cubic Meter

E 6, E 9, E 12

Very large or very small number values are commonly expressed in a form called scientific notation, which consists of a decimal part multiplied by 10 raised to some power. For example, 4.53 E 6 equals $(4.53) \times (10^6) = (4.53) \times (10 \times 10 \times 10 \times 10 \times 10 \times 10) = 4,530,000$. Scientific notation is used to express large or small numbers without writing out long strings of zeros.

EGT

Exhaust Gas Temperature

EPA

The federal Environmental Protection Agency.

Excluded

Not subject to any District Regulations.

Federally Enforceable, FE

All limitations and conditions which are enforceable by the Administrator of the 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), and also including limitations and conditions contained in operating permits issued under an EPA-approved program that has been incorporated into the SIP.

FP

Filterable Particulate as measured by BAAQMD Method ST-15, Particulate.

FR

Federal Register

GDF

Gasoline Dispensing Facility

GLC

Ground level concentration.

GLM

Ground Level Monitor

grains

1/7000 of a pound

HAP

Hazardous Air Pollutant. Any pollutant listed pursuant to Section 112(b) of the Act. Also refers to the program mandated by Title I, Section 112, of the Act and implemented by both 40 CFR Part 63, and District Regulation 2, Rule 5.

H2S

Hydrogen Sulfide

HHV

Higher Heating Value. The quantity of heat evolved as determined by a calorimeter where the combustion products are cooled to 60F and all water vapor is condensed to liquid.

LHV

Lower Heating Value. Similar to the higher heating value (see HHV) except that the water produced by the combustion is not condensed but retained as vapor at 60F.

Major Facility

A facility with potential emissions of regulated air pollutants greater than 100 tons per year, greater than or equal to 10 tons per year of any single hazardous air pollutant, and/or greater than or equal to 25 tons per year of any combination of hazardous air pollutants, or such lesser quantity as determined by the EPA administrator.

MFR

Major Facility Review. The District's term for the federal operating permit program mandated by Title V of the Act and implemented by District Regulation 2, Rule 6.

MOP

The District's Manual of Procedures.

MSDS

Material Safety Data Sheet

MW

Megawatts

NA

Not Applicable

NAAQS

National Ambient Air Quality Standards

NESHAPS

National Emission Standards for Hazardous Air Pollutants. Contained in 40 CFR Part 61.

NMHC

Non-methane Hydrocarbons

NMOC

Non-methane Organic Compounds (Same as NMHC)

NO_x

Oxides of nitrogen.

NSPS

Standards of Performance for New Stationary Sources. Federal standards for emissions from new stationary sources. Mandated by Title I, Section 111 of the Act, and implemented by both 40 CFR Part 60 and District Regulation 10.

NSR

New Source Review. A federal program for preconstruction review and permitting of new and modified sources of air pollutants for which the District is classified "non-attainment". Mandated by Title I of the Clean Air Act and implemented by 40 CFR Parts 51 and 52 as well as District Regulation 2, Rule 2. (Note: There are additional NSR requirements mandated by the California Clean Air Act.)

O₂

The chemical name for naturally-occurring oxygen gas.

Offset Requirement

A New Source Review requirement to provide federally enforceable emission offsets at a specified ratio for the emissions from a new or modified source and any pre-existing cumulative increase minus any onsite contemporaneous emission reduction credits. Applies to emissions of POC, NO_x, PM₁₀, and SO₂.

Phase II Acid Rain Facility

A facility that generates electricity for sale through fossil-fuel combustion and by virtue of certain other characteristics (defined in Regulation 2, Rule 6) is subject to Titles IV and V of the Clean Air Act.

POC

Precursor Organic Compounds

PM

Total Particulate Matter

PM₁₀

Particulate matter with aerodynamic equivalent diameter of less than 10 microns

PSD

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

Part 52 and District Regulation 2, Rule 2.

SCR

A "selective catalytic reduction" unit is an abatement device that reduces NOx concentrations in the exhaust stream of a combustion device. SCRs utilize a catalyst, which operates at a specific temperature range, and injected ammonia to promote the conversion of NOx compounds to nitrogen gas.

SIP

State Implementation Plan. State and District programs and regulations approved by EPA and developed in order to attain the National Air Ambient Quality Standards. Mandated by Title I of the Act.

SO2

Sulfur dioxide

SO2 Bubble

An SO2 bubble is an overall cap on the SO2 emissions from a defined group of sources, or from an entire facility. SO2 bubbles are sometimes used at refineries because combustion sources are typically fired entirely or in part by "refinery fuel gas" (RFG), a waste gas product from refining operations. Thus, total SO2 emissions may be conveniently quantified by monitoring the total amount of RFG that is consumed, and the concentration of H2S and other sulfur compounds in the RFG.

SO3

Sulfur trioxide

THC

Total Hydrocarbons (NMHC + Methane)

therm

100,000 British Thermal Unit

Title V

Title V of the federal Clean Air Act. Requires a federally enforceable operating permit program for major and certain other facilities.

TOC

Total Organic Compounds (NMOC + Methane, Same as THC)

TRMP

Toxic Risk Management Plan

TSP

Total Suspended Particulate

TVP

True Vapor Pressure

VOC

Volatile Organic Compounds

Units of Measure:

bhp	=	brake-horsepower
Btu	=	British Thermal Unit
g	=	grams
gal	=	gallon
hp	=	horsepower
hr	=	hour
lb	=	pound
in	=	inches
max	=	maximum
m ²	=	square meter
min	=	minute
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
scfm	=	standard cubic feet per minute
yr	=	year

Symbols:

<	=	less than
>	=	greater than
≤	=	less than or equal to
≥	=	greater than or equal to