

Bay Area Air Quality Management District

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**Permit Evaluation and
Statement of Basis**

**MAJOR FACILITY REVIEW PERMIT
MINOR REVISION**

for
Rexam Beverage Can Company
Facility #A1665

Facility Address:
2433 Crocker Circle
Fairfield, CA 94533

Mailing Address:
8770 West Bryn Mawr Avenue, Suite 175, Mail Code 11M
Chicago, IL 60631-3655

Application #: 11891

January 2006

Engineer: Ted Hull

Title V – Minor Revision

A. Background

Rexam Beverage Can Company 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 was issued a renewal Title V permit on June 27, 2005. This application is for a minor permit revision.

B. Requested Changes to the Permit

Permit Condition #391 requires that VOC and HAP emissions from the majority of coating operations at the facility be collected and controlled at a minimum 95% destruction efficiency by the Direct Flame Afterburner A-1 during all periods of operation. In order to demonstrate ongoing compliance with this requirement, Rexam must maintain a minimum incinerator temperature of 1450 degrees F and continuously monitor and record the temperature. Due to fuel costs and operational problems associated with maintaining a temperature of 1450 degrees F, Rexam is requesting the required temperature for A-1 be lowered to 1375 degrees F. They are

confident that the required destruction efficiency ($\geq 95\%$) can easily be maintained at the lower temperature and that A-1 will operate more reliably and efficiently. To support their claim, Rexam contracted with Best Environmental to perform source testing of A-1 with the purpose of establishing that an acceptable VOC destruction efficiency could be maintained at a lower temperature than is currently required by the permit.

In testing conducted on December 7, 2004 Best Environmental found that over a run of three tests with an average incinerator temperature of 1373 degrees F, the VOC destruction efficiency was maintained above 98% for each run (average destruction efficiency was 98.4%). The District's Source Test Section has reviewed the test results and has agreed with the findings. (See attached Memorandum from Tim Underwood, June 1, 2005)

Summary

There is no increase of permitted emissions associated with the proposed revision. The revision is "Minor" because the modifications to the permit do not meet any of the criteria under the definition of "Significant Permit Revision" under Regulation 2-6-226. The lowering of the required incinerator temperature does not qualify as a significant change or relaxation in monitoring, because, as established by source testing, the same demonstration of compliance with the VOC standards (i.e. $\geq 95\%$ control efficiency) is made using either the current (1450 °F) or proposed (1375 °F) minimum incinerator temperature.

C. Summary of Proposed Changes to the Permit

The following is a summary of the proposed revisions to the permit:

Section II: Equipment

- The required temperature for the Direct Flame Afterburner A-1 given in Table II B (Operating Parameters) will be changed from 1450 °F to 1375 °F.

Section VI: Permit Conditions

- Permit Condition #391, parts 6 and 7 will be modified to change the incinerator operating temperature from 1450 to 1375 degrees F as previously discussed.

Section VII: Applicable Limits and Compliance Monitoring Requirements

- The minimum incinerator temperature will be changed from 1450 to 1375 degrees F in Tables VII B, D, E, and F.

Section IX: Revision History

This section will be updated prior to issuance, upon completion of review.

D. Recommendation

Issue a minor permit revision to the Title V permit for Rexam Beverage Can Company as shown in the Proposed Major Facility Review Permit and described in this evaluation.

By: _____

Ted Hull

Senior Air Quality Engineer

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