

REXAM

Beverage Can
Americas

Semi Annual Monitoring Verification Report
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BAY AREA AIR QUALITY
MANAGEMENT DISTRICT

January 5, 2012

Director of Compliance and Enforcement
Bay Area Air Quality Management District
939 Ellis Street
San Francisco, CA 94109
Attention: Title V

Re: Rexam Beverage Can Company
2433 Crocker Circle
Fairfield, CA 94533
Facility Site I.D. #A1665
Atten: Title V Semi-Annual Monitoring Verification Report

Dear Sir or Madam:

Per the requirements of our Major Facility Review Air Operating Permit, enclosed please find the completed Title V Semi-Annual Monitoring Verification Report for our above referenced facility located in Fairfield, California. Reporting period 7/1/2011 – 12/31/2011

I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in these documents are true, accurate and complete.

If you have any questions or require additional information, please contact the undersigned at (707) 437-6645, extension 11.

Sincerely,



Dave Rubick
Plant Manager
Fairfield Facility
Rexam Beverage Can Americas

Rexam Beverage Can Americas
2433 Crocker Circle
Fairfield, California 94533
USA
Tel: +1 707 437 6645

Title V Semi-Annual Monitoring Verification Report

Table VII-A
Applicable Limits and Compliance Monitoring Requirements
S-1, S-7: Roller Coaters, Line 1 & Line 2

Type of Limit	Emission Limit Citation	PE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
VOC	BAAQMD 8-11-301.3	Y		Two-Piece Can Basecoat 250 g/l (2.1 lb/gal) of coating applied, excluding water	BAAQMD 8-11-501	P/D	Coating records	YES	
	BAAQMD 8-11-302 (alternative to 8-11-301.3)	Y		Abatement Device efficiency >90%	BAAQMD 8-11-504	C	Temperature of incineration unit	YES	
	BAAQMD 8-11-305.1 (optional)	Y		Daily weighted average VOC emissions from all coatings equivalent to VOC limits specified by 8-11-301	BAAQMD 8-11-305.3 — 8-11-503.1	P/A — P/E	Alternative Emission Control Plan substantial — Excess emissions reporting	YES	
VOC	NSPS Subpart WW, 60.492 (a)	Y		Exterior Base Coat: 0.29 kilogram of VOC per liter (2.42 lb/gal) of coating solids	NSPS Subpart WW, 60.493-(b)	P/M	Coating records, Initial performance test, Monthly operating parameters	YES	
	Condition #391, part 1	Y		Facility Limit has been change to 34.4 Tons/Yr	Condition 0391, part 9(a)	P/D	Opening time, Can production rate, Amount of coating used	YES	

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Table VII-B

Applicable Limits and Compliance Monitoring Requirements

S-2, S-8: Coater Ovens

Type of Limit	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N) ^(b)	Monitoring Type	Compliance	
								Yes	No
VOC	BAAQMD 8-11-301.3	Y		Two-Piece Can Basecoat: 250 g/l (2.1 lb/gal) of coating applied, excluding water	BAAQMD 8-11-501	P/D	Coating records	YES	
VOC	BAAQMD 8-11-302 (alternative to 8-11-301.3)	Y		Abatement Device efficiency ≥90%	BAAQMD 8-11-504	C	Temperature of incineration unit	YES	
	NSPS Subpart WW, 60.492 (a)	Y		Exterior Base Coat 0.29 kilograms (VOC per liter (2.42 lb/gal) of coating solids	NSPS Subpart WW, 60.493 (b)	P/M	Coating records, Initial performance test, Monthly operating parameters	YES	
	Condition #391, part 1	Y		34.4 tons/yr. facility limit	Condition #391, part 9(a)	P/D	Operating time, Can production rate, Amount of coating used	YES	
	Condition #391, part 5	Y		Abatement Device efficiency ≥95%	Condition #391, part 7	C	Temperature of incineration unit	YES	
	Condition #391, part 6	Y		Minimum Incinerator Temperature A-9 is 1600 degrees F	Condition #391, part 7	C	Temperature of incineration unit	YES	

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**Table VII-C
 Applicable Limits and Compliance Monitoring Requirements
 S-3, S-9: Printers, Line 1 & Line 2**

Type of Limit	Emissions Limit Citation	FE Y/N	Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (F/C/N)	Monitoring Type	Compliance	
								Yes	No
VOC	BAAQMD 8-11-301.3	Y		Overvsnish 250 g/l (2.1 lb/gal) of coating applied, excluding water	BAAQMD 8-11-501	P/D	Coating records	YES	
	BAAQMD 8-11-301.10	N		Inks: 300 g/l (2.5 lb/gal) of coating applied, excluding water	BAAQMD 8-11-501	P/D	Coating records	YES	
	BAAQMD 8-11-302 (alternative to 8-11-301.3, 301.10)	Y		Abatement Device efficiency ≥ 90%	BAAQMD 8-11-504	C	Temperature of incineration unit	YES	
	BAAQMD 8-11-305.1 (optional)	Y		Daily weighted average VOC emissions from all coatings equivalent to VOC limits specified by 8-11-301	BAAQMD 8-11-305.3 - 8-11-503.1	P/A - P/E	Alternative Emission Control Plan submitted - Excess emissions reporting	YES	
	SIP 8-11-301.9	Y		Inks: 300 g/l (2.5 lb/gal) of coating applied, excluding water	SIP 8-11-501	P/D	Coating records	YES	

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**Table VII-C
 Applicable Limits and Compliance Monitoring Requirements
 S-3, S-9: Printers, Line 1 & Line 2**

Type of Limit	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
VOC	NSPS Subpart WW, 60.492 (b)	Y		Over-varnish: 0.46 kilogram of VOC per liter (3.84 lb/gal) of coating solids	NSPS Subpart WW, 60.493 (b)	P/M	Coating records, Initial performance test, Monthly operating parameters	YES	
	Condition 391, part 1	Y		34.4 tons/yr, facility limit	Condition 4391, part 9(a)	P/D	Operating time, Can production rate, Amount of coating used	YES	

**Table VII -D
 Applicable Limits and Compliance Monitoring Requirements
 S-4, S-10: Printer Ovens**

Type of Limit	Emission Limit Citation	FE	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	compliance	
								Yes	No
VOC	BAAQMD 8-11-301.3	Y		Overvarnish: 250 g/l (2.1 lb/gal) of coating applied, excluding water	BAAQMD 8-11-501	P/D	Coating records	YES	
	BAAQMD 8-11-301.10	N		Inks 300 g/l (2.5 lb/gal) of coating applied, excluding water	BAAQMD 8-11-501	P/D	Coating records	YES	

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**Table VII-D
 Applicable Limits and Compliance Monitoring Requirements
 S-4, S-10: Printer Ovens**

Type of Limit	Emission Limit Citation	FE	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
VOC	HAAQMD 8-11-302 (alternative to 8-11-301.3, 301.10)	Y		Abatement Device efficiency $\geq 90\%$	BAAQMD 8-11-504	C	Temperature of incineration unit	YES	
	SIP 8-11-301.9	Y		Inks: 300 g/l (2.5 lb/gal) of coating applied, excluding water	HAAQMD 8-11-501	P/D	Coating records	YES	
	NSPS Subpart WW, 60.492 (b)	Y		Overvarnish / Clear Basecoat: 0.46 kilogram of VOC per liter (3.84 lb/gal) of coating solids	NSPS Subpart WW, 60.493 (b)	F/M	Coating records, Initial performance test, Monthly operating parameters	YES	
	Condition #391, part 1	Y		34.4 tons/yr, facility limit	Condition #391, part 9(a)	P/D	Operating time, Can production rate, Amount of coating used	YES	
VOC	Condition #391, part 5	Y		Abatement Device efficiency $\geq 95\%$	Condition #391, part 7	C	Temperature of incineration unit	YES	
	Condition #391, part 6	Y		Minimum Incinerator Temperature of A-9 is 1600 degrees F	Condition #391, part 7	C	Temperature of incineration unit	YES	

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**Table VII-E
 Applicable Limits and Compliance Monitoring Requirements
 S-5, S-11: Inside Spray Machines, Line 1 & Line 2**

Type of Limit	Emissions Limit Citation	RE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/D)	Monitoring Type	Compliance	
								Yes	No
VOC	BAAQMD 8-11-301.4.1	Y		Interior Body Spray: 420 g/l (3.5 lb/gal) of coating applied excluding water	BAAQMD 8-11-501	P/D	Coating records	YES	
	BAAQMD 8-11-302 (alternative to 8-11-301.4)	N		Abatement Device efficiency ≥ 90%	BAAQMD 8-11-504	C	Temperature of incineration unit	YES	
	BAAQMD 8-11-305.1 (optional)	Y		Daily weighted average VOC emissions from all coatings equivalent to VOC limits specified by 8-11-301	BAAQMD 8-11-305.3-8-11-503.1	P/A - P/E	Temperature of incineration unit	YES	
	SIP 8-11-301.4	Y		Interior Body Spray: 510 g/l (4.2 lb/gal) of coating applied excluding water	SIP 8-11-501	P/D	Alternative Emission Control Plan submittal Excess emissions reporting	YES	
	NSPS Subpart WW, 60.492 (c)	Y		Inside Spray: 0.89 kilogram of VOC per liter (7.43 lb/gal) of coating solids	NSPS Subpart WW 60.493 (b)	P/M	Coating Records Initial Performance Test Monthly operating Parameters	YES	

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Table VII-E

Applicable Limits and Compliance Monitoring Requirements

S-5, S-11: Inside Spray Machines, Line 1 & 2

Type of Limit	Emission Limit Citation	PE Y/N	Permit Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/N)	Monitoring Type	Compliance	
								Yes	No
VOC	Condition #391 Part 1	Y		34.4 tons/yr. facility limit	Condition #391, part 9 (a)	P/D	Operating time Can production rate, Amount of coating used	YES	
	Condition #391 Part 5	Y		Abatement Device efficiency $\geq 95\%$	Condition #391, part 4	P/D	Ventilation System negative pressure monitoring	YES	
	Condition #391 Part 5	Y		Abatement Device efficiency $\geq 95\%$	Condition #391, part 7	C	Temperature of incineration unit	YES	
	Condition #391, part 6	Y		Minimum incinerator Temperature of A-9 is 1600 degrees F	Condition #391, part 7	C	Temperature of incineration unit	YES	
TSP	Regulation 6-301	Y		Ringelmann 1.0		N		YES	
	Regulation 6-310	Y		0.15 g/dscf	Condition #16547, part 2	P/Q	Baghouse Inspection	YES	

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**Table VII-F
 Applicable Limits and Compliance Monitoring Requirements
 S-6, S-12: Bake Ovens**

Type of Limit	Emission Limit Citation	FE	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
VOC	BAAQMD 8-11-301.4.1	N		Interior Body Spray: 420 g/l (3.5lb/gal) of coating applied excluding water	BAAQMD 8-11-501	P/D	Coating records	YES	
	BAAQMD 8-11-302 (alternative to 8-11-301.4)	Y		Abatement Device efficiency \geq 90%	BAAQMD 8-11-504	C	Temperature of incineration unit	YES	
	STP 8-11-301.4	Y		Interior Body Spray: 510 g/l(4.2 lb/gal) of Coating applied excluding water					
	NSPS Subpart WW 60.492 (c)	Y		Inside Spray Coat: 0.89 kilogram of VOC per liter (7.43 lb/gal) of coating solids	NSPS Subpart WW, 60.493 (b)	P/M	Coating records Initial Performance test. Monthly operating Parameters	YES	
	Condition #391, part 1	Y		34.4 tons/yr. facility Limit	Condition #391, part 9 (a)	P/D	Operating Time. Can production rate amount of coating used	YES	
	Condition #391, part 5	Y		Abatement device efficiency \geq 95%	Condition #391, part 7	C	Temperature of incineration unit	YES	
VOC	Condition #391, part 6	Y		Minimum Incinerator Temperature of A-9 is 1600 degrees F	Condition #391, part 7	C	Temperature of incineration unit	YES	

July 1, 2011 – Dec 31, 2011

Plant: Rexam Beverage Can Company
 2433 Crocker Circle
 Fairfield, CA 94533
 Permit Site # A1665
 Date: January 05, 2012

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**Table VII G
 Applicable Limits and Compliance Monitoring Requirements
 S-17, Lime Silo**

Type of Limit	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
TSP	Regulation 6-301	Y		Ringelmann 1.0	Condition #1654H, part 2,3	P/A	Visible Emissions Checks Records for S-17	YES	
	Regulation 6-310	Y		0.15 /dsol		N	rate. Amount of coating used	YES	

**Table VII -G
 Applicable Limits and Compliance Monitoring Requirements
 S-16 Scrap Collection System**

Type of Limit	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	compliance	
								Yes	No
TSP	Regulation 6-301	Y		Ringelmann 1.0	Condition #1654H, part 2,3			YES	
	Regulation 6-310	Y		0.15 /dsol				YES	