# Bay Area Air Quality Management District

939 Ellis Street
San Francisco, CA 94109
(415) 771-6000

---

## Final

# MAJOR FACILITY REVIEW PERMIT

**Issued To:**

## Rexam Beverage Can Company
## Site #A1665

**Site Address:**
2433 Crocker Circle Drive
Fairfield, CA 94533

**Mailing Address:**
8770 W. Bryn Mawr Avenue, M.S. 04D
Chicago, IL 60631-3542

**Responsible Official**
Allan J. Bohner,
Senior Vice President
North America Manufacturing
& Worldwide Engineering
(773) 399-3389

**Facility Contact**
Ronald J. Kanuch,
Plant Manager
(707) 437-6645

---

| | | |
|---|---|---|
| **Type of Facility:** | Beverage Can Manufacturing | BAAQMD Permit Division Contact: |
| **Primary SIC:** | 3411 | Ted Hull |
| **Product:** | Coated and Decorated Aluminum Beverage Cans | |

**ISSUED BY THE BAY AREA AIR QUALITY MANAGEMENT DISTRICT**

Signed by William C. Norton _____ 2-19-2003

William C. Norton, Executive Officer/Air Pollution Control Officer — Date

# TABLE OF CONTENTS

# I. STANDARD CONDITIONS

## A. Administrative Requirements

The permit holder shall comply with all applicable requirements in the following regulations:
BAAQMD Regulation 1 - General Provisions and Definitions
(as amended by the District Board on 10/7/98);
SIP Regulation 1 - General Provisions and Definitions
(as approved by EPA through 9/29/98);
BAAQMD Regulation 2, Rule 1 - Permits, General Requirements
(as amended by the District Board on 10/7/98);
SIP Regulation 2, Rule 1 - Permits, General Requirements
(as approved by EPA through 1/26/99);
BAAQMD Regulation 2, Rule 2 - Permits, New Source Review
(as amended by the District Board on 10/7/98);
SIP Regulation 2, Rule 2 - Permits, New Source Review and Prevention of Significant Deterioration
(as approved by EPA through 1/26/99);
BAAQMD Regulation 2, Rule 4 - Permits, Emissions Banking
(as amended by the District Board on 10/7/98); and
SIP Regulation 2, Rule 4 - Permits, Emissions Banking
(as approved by EPA through 1/26/99).

## B. Conditions to Implement Regulation 2, Rule 6, Major Facility Review

1. This Major Facility Review Permit expires on July 28, 2004. The permit holder shall submit a complete application for renewal of this Major Facility Review Permit no later than January 28, 2004 and no earlier July 28, 2003. **If a complete application for renewal has not been submitted in accordance with these deadlines, the facility may not operate after July 28, 2004.** (Regulation 2-6-307, 404.2, & 409.6; MOP Volume II, Part 3, §4.2)
2. The permit holder shall comply with all conditions of this permit. The permit consists of this document and all appendices. Any non-compliance with the terms and conditions of this permit will constitute a violation of the law and will be grounds for enforcement action; permit termination, revocation and re-issuance, or modification; or denial of a permit renewal application. (Regulation 2-6-307; MOP Volume II, Part 3, §4.11)
3. In the event any enforcement action is brought as a result of a violation of any term or condition of this permit, the fact that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with such term or condition shall not be a defense to such enforcement action. (MOP Volume II, Part 3, §4.11)
4. This permit may be modified, revoked, reopened and reissued, or terminated for cause. (Regulation 2-6-307, 409.8, 415; MOP Volume II, Part 3, §4.11)
5. The filing of a request by the facility for a permit modification, revocation and re-issuance, or termination, or of a notification of planned changes or anticipated non-compliance does not stay the applicability of any permit condition. (Regulation 2-6-409.7; MOP Volume II, Part 3, §4.11)

# I. Standard Conditions

6. This permit does not convey any property rights of any sort, nor any exclusive privilege. (Regulation 2-6-409.7; MOP Volume II, Part 3, §4.11)
7. The permit holder shall supply within 30 days any information that the District requests in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. (Regulation 1-441, Regulation 2-6-409.4 & 501; MOP Volume II, Part 3, §4.11)
8. Any records required to be maintained pursuant to this permit which the permittee considers to contain proprietary or trade secret information shall be prominently designated as such. Copies of any such proprietary or trade secret information which are provided to the District shall be maintained by the District in a locked confidential file, provided, however, that requests from the public for the review of any such information shall be handled in accordance with the District's procedures set forth in Section 11 of the District Administrative Code. (Regulation 2-6-419; MOP Volume II, Part 3, §4.11)
9. Proprietary or trade secret information provided to EPA will be subject to the requirements of 40 CFR Part 2, Subpart B - Public Information, Confidentiality of Business Information. (40 CFR Part 2)
10. The emissions inventory submitted with the application for this Major Facility Review Permit is an estimate of actual emissions for the time period stated and is included only as one means of determining applicable requirements for emission sources. It does not establish, or constitute a basis for establishing, any new emission limitations. (MOP Volume II, Part 3, §4.11)

**C. Requirement to Pay Fees**

The permit holder shall pay annual fees in accordance with District Regulation 3, including Schedule P. (Regulation 2-6-402 & 409.13, Regulation 3; MOP Volume II, Part 3, §4.12)

**D. Inspection and Entry**

Access to Facility: The permit holder shall provide reasonable access to the facility and equipment which is subject to this permit to the APCO and/or to his or her designee. (Regulation 1-440, Regulation 2-6-409.3; MOP Volume II, Part 3, §4.14)

**E. Records**

Notwithstanding the specific wording in any requirement, all records for federally enforceable requirements shall be maintained for at least five years from the date of entry. (Regulation 2-6-501, Regulation 3; MOP Volume II, Part 3, §4.7)

**F. Monitoring Reports**

All required monitoring reports must be submitted to the District at least once every six months, except where an applicable requirement specifies more frequent reporting. All instances of non-compliance shall be clearly identified in these reports. The reports shall be certified by the responsible official as true, accurate, and complete. In addition, all instances of non-compliance with the permit shall be reported in writing to the District's Compliance and Enforcement Division within 10 calendar days of the discovery of the incident. Within 30 calendar days of the discovery of any incident of non-compliance, the facility shall submit a written report including the probable cause of non-compliance

# I. Standard Conditions

and any corrective or preventative actions. The reports shall be sent to the following address:

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

(Regulation 2-6-502, Regulation 3; MOP Volume II, Part 3, §4.7)

**G. Compliance Certification**

Compliance certifications shall be submitted annually by the responsible official of this facility to the Bay Area Air Quality Management District and to the Environmental Protection Agency. The certification must list each applicable requirement, the compliance status, whether compliance was continuous or intermittent, the method used to determine compliance, and any other specific information required by the permit. The permit holder may satisfy this requirement through submittal of District-generated Compliance Certification forms. The certification should be directed to the District's Compliance and Enforcement Division at the address above, and a copy of the certification should be sent to the Environmental Protection Agency at the following address:

Director of the Air Division
USEPA, Region IX
75 Hawthorne Street
San Francisco, CA 94105
Attention: Air-3

(MOP Volume II, Part 3, §4.5 and 4.15)

**H. Emergency Provisions**

1. The permit holder may seek relief from enforcement action in the event of a breakdown, as defined by Regulation 1-208 of the District's Rules and Regulations, by following the procedures contained in Regulations 1-431 and 1-432. The District will thereafter determine whether breakdown relief will be granted in accordance with Regulation 1-433. (MOP Volume II, Part 3, §4.8)
2. The permit holder may seek relief from enforcement action for a violation of any of the terms and conditions of this permit caused by conditions beyond the permit holder's reasonable control by applying to the District's Hearing Board for a variance pursuant to Health and Safety Code Section 42350. The Hearing Board will determine after notice and hearing whether variance relief should be granted in accordance with the procedures and standards set forth in Health and Safety Code Section 42350 et seq. Any variance granted by the Hearing Board from any term or condition of this permit which lasts longer than 90 days will be subject to EPA approval. (MOP Volume II, Part 3, §4.8)
3. Notwithstanding the foregoing, the granting by the District of breakdown relief or the

# I. Standard Conditions

issuance by the Hearing Board of a variance will not provide relief from federal enforcement unless the Major Facility Review Permit has been modified pursuant to Regulation 2, Rule 6. (MOP Volume II, Part 3, §4.8)

**I. Severability**

In the event that any provision of this permit is invalidated by a court or tribunal of competent jurisdiction, or by the Administrator of the EPA, all remaining portions of the permit shall remain in full force and effect. (Regulation 2-6-409.5; MOP Volume II, Part 3, §4.10)

# II. EQUIPMENT

## Table II A - Permitted Sources

Each of the following sources has been issued a permit to operate pursuant to the requirements of BAAQMD Regulation 2, Permits.

| S-# | Description | Make or Type | Model | Capacity |
|---|---|---|---|---|
| S-1 | Roller Coater - Line 1 | Rutherford | CB 1200 | 1,200 Cans Per Minute |
| S-2 | Coater Oven - Line 1 | Feco Pin, Natural Gas | | 3.6 MMBTU/hr |
| S-3 | Printer - Line 1 | Rutherford | CD 1200 | 1,200 CPM |
| S-4 | Printer Oven - Line 1 | Feco Pin, Natural Gas | | 3.6 MMBTU/hr |
| S-5 | Spray Machines - Line 1 | NCC | 773.3 | (6) x 225 CPM |
| S-6 | Bake Oven - Line 1 | Feco Pin, Natural Gas | | 3.0 MMBTU/hr |
| S-7 | Roller Coater - Line 2 | Rutherford | CB 1200 | 1,200 CPM |
| S-8 | Coater Oven - Line 2 | Feco Pin, Natural Gas | | 3.6 MMBTU/hr |
| S-9 | Printer - Line 2 | Rutherford | CD 1200 | 1,200 CPM |
| S-10 | Printer Oven - Line 2 | Feco Pin, Natural Gas | | 3.6 MMBTU/hr |
| S-11 | Spray Machines - Line 2 | NCC | 773.3 | (6) x 225 CPM |
| S-12 | Bake Oven - Line 2 | Feco Pin, Natural Gas | | 3.0 MMBTU/hr |
| S-13 | Basecoat Bulk Tank | Fixed Roof | | 10,000 gallons |
| S-14 | Overvarnish Bulk Tank | Fixed Roof | | 10,000 gallons |
| S-15 | Inside Spray Bulk Tank | Fixed Roof | | 10,000 gallons |
| S-16 | Scrap Collection System | BLO-APCO | 185 | 1,000 lb/hr |
| S-17 | Lime Silo | Lime Storage | | 10 tons/hr max fill rate |

# II. Equipment

## Table II B - Abatement Devices

| A-# | Description | Source(s) Controlled | Applicable Requirement | Operating Parameters | Required Efficiency |
|---|---|---|---|---|---|
| A-1 | Direct Flame Afterburner | 2,4,5,6,8, 10,11,12 | BAAQMD Condition #394; Parts 3,4,5,6,7 | 1,450 $^{o}$F during all periods of operation | 95% |
| A-1 | Direct Flame Afterburner | 1,2,3,4,5,6,7 ,8,9,10, 11,12 | Regulation 8-11-302 | Required for coating usage not complying with 8-11-301 | 90% |
| A-1 | Direct Flame Afterburner | 1,2,3,4,5,6,7 ,8,9,10, 11,12 | NSPS Subpart WW | As needed | Achieve VOC emission standards of 60.492 |
| A-2 | Pulse Jet Baghouse | 5, 11 | Regulation 6-301, 6-310 | As needed | Ringelmann #1; 0.15 gr/dscf |
| A-3 | Vapor Balance System | 13 | None | N/A | N/A |
| A-4 | Vapor Balance System | 14 | None | N/A | N/A |
| A-5 | Vapor Balance System | 15 | None | N/A | N/A |
| A-6 | Scrap Cyclone | 16 | Regulation 6-301, 6-310 | As needed | Ringelmann #1; 0.15 gr/dscf |
| A-7 | Oil Mist Collector | 16 | Regulation 6-301, 6-310 | As needed | Ringelmann #1; 0.15 gr/dscf |
| A-8 | Lime Silo Baghouse | 17 | Regulation 6-301, 6-310 | As needed | Ringelmann #1; 0.15 gr/dscf |

# III. GENERALLY APPLICABLE REQUIREMENTS

The permit holder shall comply with all applicable requirements, including those specified in the BAAQMD and SIP Rules and Regulations and other federal requirements cited below. These requirements apply in a general manner to the facility and/or to sources exempt from the requirement to obtain a District Permit to Operate. The District has determined that these requirements would not be violated under normal, routine operations, and that no additional periodic monitoring or reporting to demonstrate compliance is warranted. In cases where a requirement, in addition to being generally applicable, is also specifically applicable to one or more sources, the requirement and the source are also included in Section IV, Source-Specific Applicable Requirements, of this permit.

The dates in parenthesis in the Title column identify the versions of the regulations being cited and are, as applicable:

1. BAAQMD regulation(s): The date(s) of adoption or most recent amendment of the regulation by the District Board
2. Any federal requirement, including a version of a District regulation that has been approved into the SIP: The most recent date of EPA approval of any portion of the rule, encompassing all actions on the rule through that date

Where an applicable requirement is a SIP requirement, the full language of the SIP requirement is included in Appendix A of this permit.

**NOTE:**
There are differences between the current BAAQMD rule and the version of the rule in the SIP. For specific information, contact the District's Rule Development Section of the Enforcement Division. All sources must comply with both versions of the rule until US EPA has reviewed and approved (or disapproved) the District's revision of the regulation.

**Table III**
**Generally Applicable Requirements**

| Applicable Requirement | Regulation Title or Description of Requirement | Federally Enforceable (Y/N) |
|---|---|---|
| BAAQMD Regulation 1 | General Provisions and Definitions (10/7/98) | N |
| SIP Regulation 1 | General Provisions and Definitions (9/29/98) | Y[1] |
| BAAQMD Regulation 5 | Open Burning (11/2/94) | Y |
| BAAQMD Regulation 6 | Particulate Matter and Visible Emissions (12/19/90) | Y |

# III. Generally Applicable Rquirements

## Table III
## Generally Applicable Requirements

| Applicable Requirement | Regulation Title or Description of Requirement | Federally Enforceable (Y/N) |
|---|---|---|
| BAAQMD Regulation 7 | Odorous Substances (3/17/82) | N |
| BAAQMD Regulation 8, Rule 1 | Organic Compounds - General Provisions (6/15/94) | Y |
| BAAQMD Regulation 8, Rule 3 | Organic Compounds - Architectural Coatings (12/20/95) | Y |
| BAAQMD Regulation 8, Rule 49 | Organic Compounds - Aerosol Paint Products (12/20/95) | N |
| SIP Regulation 8, Rule 49 | Organic Compounds - Aerosol Paint Products (3/22/95) | Y[1] |
| BAAQMD Regulation 8, Rule 51 | Organic Compounds - Adhesive and Sealant Products (12/20/95) | N |
| BAAQMD Regulation 9, Rule 1 | Inorganic Gaseous Pollutants – Sulfur Dioxide (3/15/95) | N |
| SIP Regulation 9, Rule 1 | Inorganic Gaseous Pollutants – Sulfur Dioxide (7/8/99) | Y[1] |
| BAAQMD Regulation 11, Rule 2 | Hazardous Pollutants - Asbestos Demolition, Renovation and Manufacturing (12/4/91) | Y |
| BAAQMD Regulation 12, Rule 4 | Miscellaneous Standards of Performance - Sandblasting (7/11/90) | Y |

# IV. SOURCE-SPECIFIC APPLICABLE REQUIREMENTS

The permit holder shall comply with all applicable requirements, including those specified in the BAAQMD and SIP Rules and Regulations and other federal requirements cited below. The requirements cited in the following tables apply in a specific manner to the indicated source(s).

The dates in parenthesis in the Title column identify the versions of the regulations being cited and are, as applicable:

1. BAAQMD regulation(s):
The date(s) of adoption or most recent amendment of the regulation by the District Board
2. Any federal requirement, including a version of a District regulation that has been approved into the SIP:
The most recent date of EPA approval of any portion of the rule, encompassing all actions on the rule through that date

The full text of each permit condition cited is included in Section VI, Permit Conditions, of this permit. Additionally, where an applicable requirement is a SIP requirement, the full language of the SIP requirement is included in Appendix A of this permit. All other text may be found in the regulations themselves.

**Table IV-A**
**Source-Specific Applicable Requirements**
**S-1, S-7: Roller Coaters, Line 1 & Line 2**

| Applicable Requirement | Regulation Title or Description of Requirement | Federally Enforceable (Y/N) | Future Effective Date |
|---|---|---|---|
| **BAAQMD Regulation 8, Rule 11** | **Organic Compounds – Metal Container, Closure And Coil Coating (11/19/97)** | | |
| 8-11-301 | Metal Container or Closure Coating Limitations | | |
| 8-11-301.3 | VOC Limit – Two-Piece Can Basecoat | Y | |
| 8-11-302 | Emission Control Device Requirement (alternative to coating limits) | Y | |
| 8-11-305 | Alternate Emission Control Plan (optional) | Y | |
| 8-11-306 | Surface Preparation and Cleanup Solvent | Y | |
| 8-11-402 | Operation and Maintenance Plan | Y | |
| 8-11-501 | Coating Records | Y | |
| 8-11-504 | Afterburner Temperature Monitoring (where applicable) | Y | |

# IV. Source-Specific Applicable Requirements

## Table IV-A
## Source-Specific Applicable Requirements
## S-1, S-7: Roller Coaters, Line 1 & Line 2

| Applicable | Regulation Title or | Federally Enforceable | Future Effective |
|---|---|---|---|
| **NSPS Part 60** | **Standards of Performance for New Stationary Sources (12/23/71)** | | |
| **Subpart A** | **General Provisions** | **Y** | |
| 60.7 | Notification and Record Keeping | Y | |
| 60.8 (a) | Initial Performance Test | Y | |
| 60.9 | Availability of Information | Y | |
| 60.11 (a) | Compliance with standards and maintenance requirements | Y | |
| 60.12 | Circumvention | Y | |
| 60.13 (a)(b)(e)(f)(i) | Monitoring Requirements | Y | |
| **NSPS Subpart WW** | **Standards of Performance for the Beverage Can Surface Coating Industry (8/25/83)** | | |
| 60.492 (a) | VOC Limit – Two-Piece Can Exterior Basecoat | Y | |
| 60.493 (b) | Monthly Performance Test | Y | |
| 60.494 | Monitoring of Operations | Y | |
| 60.495 | Reporting and Recordkeeping | Y | |
| 60.496 | Test Methods and Procedures | Y | |
| **BAAQMD Cond #391** | | | |
| part 1 | Facility VOC Limit [Cumulative Increase] | Y | |
| part 12 | Recordkeeping [Cumulative Increase] | Y | |

# IV. Source-Specific Applicable Requirements

## Table IV-B
## Source-Specific Applicable Requirements
## S-2, S-8: Coater Ovens

| Applicable Requirement | Regulation Title or Description of Requirement | Federally Enforceable (Y/N) | Future Effective Date |
|---|---|---|---|
| **BAAQMD Regulation 8, Rule 11** | **Organic Compounds – Metal Container, Closure And Coil Coating (11/19/97)** | | |
| 8-11-301 | Metal Container or Closure Coating Limitations | | |
| 8-11-301.3 | VOC Limit – Two-Piece Can Basecoat | Y | |
| 8-11-302 | Emission Control Device Requirement (alternative to coating limits) | Y | |
| 8-11-305 | Alternate Emission Control Plan (optional) | Y | |
| 8-11-402 | Operation and Maintenance Plan | Y | |
| 8-11-504 | Afterburner Temperature Monitoring (where applicable) | Y | |
| **NSPS Part 60** | **Standards of Performance for New Stationary Sources (12/23/71)** | | |
| **Subpart A** | **General Provisions** | | |
| 60.7 | Notification and Record Keeping | Y | |
| 60.8 (a) | Initial Performance Test | Y | |
| 60.9 | Availability of Information | Y | |
| 60.11 (a) | Compliance with standards and maintenance requirements | Y | |
| 60.12 | Circumvention | Y | |
| 60.13 (a)(b)(e)(f)(i) | Monitoring Requirements | Y | |
| **NSPS Subpart WW** | **Standards of Performance for the Beverage Can Surface Coating Industry (8/25/83)** | | |
| 60.492(a) | VOC Limits | Y | |
| 60.493 (b) | Monthly Performance Test | Y | |
| 60.494 | Monitoring of Operations | Y | |
| 60.495 | Reporting and Recordkeeping | Y | |
| 60.496 | Test Methods and Procedures | Y | |
| **BAAQMD Cond #391** | | | |
| part 2 | Afterburner Requirement [BACT, Regulation 8-11-302] | Y | |
| part 3 | Automatic Oven Shutdown when Airflow is Lost [BACT] | Y | |

# IV. Source-Specific Applicable Requirements

## Table IV-B
## Source-Specific Applicable Requirements
## S-2, S-8: Coater Ovens

| Applicable Requirement | Regulation Title or Description of Requirement | Federally Enforceable (Y/N) | Future Effective Date |
|---|---|---|---|
| part 5 | Afterburner VOC Control Efficiency [BACT] | Y | |
| part 6 | Incinerator Temperature [BACT] | Y | |
| part 7 | Incinerator Temperature Monitoring/Recording [BACT, Regulation 8-11-504] | Y | |
| part 8 | Allowable temperature excursions [Regulation 2-1-403] | Y | |
| part 9 | Allowable temperature excursion recordkeeping [Regulation 2-1-403] | Y | |
| part 10 | Definition of temperature excursion [Regulation 2-1-403] | Y | |
| part 11 | Incinerator Temperature Recordkeeping [BACT] | Y | |
| part 12 | Recordkeeping [Cumulative Increase] | Y | |

## Table IV-C
## Source-Specific Applicable Requirements
## S-3, S-9: Printers, Line 1 & Line 2

| Applicable Requirement | Regulation Title or Description of Requirement | Federally Enforceable (Y/N) | Future Effective Date |
|---|---|---|---|
| **BAAQMD Regulation 8, Rule 11** | **Organic Compounds – Metal Container, Closure And Coil Coating (11/19/97)** | | |
| 8-11-301 | Metal Container or Closure Coating Limitations | | |
| 8-11-301.3 | VOC Limit – Two-Piece Can Overvarnish | Y | |
| 8-11-301.10 | VOC Limit – Inks | N | |
| 8-11-302 | Emission Control Device Requirement (alternative to coating limits) | Y | |
| 8-11-305 | Alternative Emission Control Plan (optional) | Y | |
| 8-11-306 | Surface Preparation and Cleanup Solvent | Y | |
| 8-11-402 | Operation and Maintenance Plan | Y | |

# IV. Source-Specific Applicable Requirements

## Table IV-C
## Source-Specific Applicable Requirements
## S-3, S-9: Printers, Line 1 & Line 2

| Applicable | Regulation Title or | Federally Enforceable | Future Effective |
|---|---|---|---|
| 8-11-501 | Coating Records | Y | |
| 8-11-504 | Afterburner Temperature Monitoring (where applicable) | Y | |
| **SIP Regulation 8, Rule 11** | **Organic Compounds – Metal Container, Closure And Coil Coating (12/23/97)** | | |
| 8-11-301 | Metal Container or Closure Coating Limitations | Y[1] | |
| 8-11-301.9 | VOC Limit – Inks | Y[1] | |
| **NSPS Part 60** | **Standards of Performance for New Stationary Sources (12/23/71)** | | |
| **Subpart A** | **General Provisions** | | |
| 60.7 | Notification and Record Keeping | Y | |
| 60.8 (a) | Initial Performance Test | Y | |
| 60.9 | Availability of Information | Y | |
| 60.11 (a) | Compliance with standards and maintenance requirements | Y | |
| 60.12 | Circumvention | Y | |
| 60.13 (a)(b)(e)(f)(i) | Monitoring Requirements | Y | |
| **NSPS Subpart WW** | **Standards of Performance for the Beverage Can Surface Coating Industry (8/25/83)** | | |
| 60.492 (b) | VOC Limit – Two-Piece Can Clear Basecoat and Overvarnish | Y | |
| 60.493 (b) | Monthly Performance Test | Y | |
| 60.494 | Monitoring of Operations | Y | |
| 60.495 | Reporting and Recordkeeping | Y | |
| 60.496 | Test Methods and Procedures | Y | |
| **BAAQMD Cond #391** | | | |
| part 1 | Facility VOC Limit [Cumulative Increase] | Y | |
| part 12 | Recordkeeping [Cumulative Increase] | Y | |

# IV. Source-Specific Applicable Requirements

## Table IV-D
## Source-Specific Applicable Requirements
## S-4, S-10: Printer Ovens

| Applicable Requirement | Regulation Title or Description of Requirement | Federally Enforceable (Y/N) | Future Effective Date |
|---|---|---|---|
| **BAAQMD Regulation 8, Rule 11** | **Organic Compounds – Metal Container, Closure And Coil Coating (11/19/97)** | | |
| 8-11-301 | Metal Container or Closure Coating Limitations | | |
| 8-11-301.3 | VOC Limit – Two-Piece Can Overvarnish | Y | |
| 8-11-301.10 | VOC Limit – Inks | N | |
| 8-11-302 | Emission Control Device Requirement (alternative to coating limits) | Y | |
| 8-11-305 | Alternate Emission Control Plan (optional) | Y | |
| 8-11-402 | Operation and Maintenance Plan | Y | |
| 8-11-504 | Afterburner Temperature Monitoring (where applicable) | Y | |
| **SIP Regulation 8, Rule 11** | **Organic Compounds – Metal Container, Closure And Coil Coating (12/23/97)** | | |
| 8-11-301 | Metal Container or Closure Coating Limitations | Y[1] | |
| 8-11-301.9 | VOC Limit – Inks | Y[1] | |
| **NSPS Part 60** | **Standards of Performance for New Stationary Sources (12/23/71)** | | |
| **Subpart A** | **General Provisions** | | |
| 60.7 | Notification and Record Keeping | Y | |
| 60.8 (a) | Initial Performance Test | Y | |
| 60.9 | Availability of Information | Y | |
| 60.11 (a) | Compliance with standards and maintenance requirements | Y | |
| 60.12 | Circumvention | Y | |
| 60.13 (a)(b)(e)(f)(i) | Monitoring Requirements | Y | |
| **NSPS Subpart WW** | **Standards of Performance for the Beverage Can Surface Coating Industry (8/25/83)** | | |
| 60.492(b) | VOC Limits | Y | |
| 60.493 (b) | Monthly Performance Test | Y | |
| 60.494 | Monitoring of Operations | Y | |
| 60.495 | Reporting and Recordkeeping | Y | |

# IV. Source-Specific Applicable Requirements

## Table IV-D
## Source-Specific Applicable Requirements
## S-4, S-10: Printer Ovens

| Applicable | Regulation Title or | Federally Enforceable | Future Effective |
|---|---|---|---|
| 60.496 | Test Methods and Procedures | Y | |
| **BAAQMD Cond #391** | | | |
| part 2 | Afterburner Requirement [BACT, Regulation 8-11-302] | Y | |
| part 3 | Automatic Oven Shutdown when Airflow is Lost [BACT] | Y | |
| part 5 | Afterburner VOC Control Efficiency [BACT] | Y | |
| part 6 | Incinerator Temperature [BACT] | Y | |
| part 7 | Incinerator Temperature Monitoring/Recording [BACT, Regulation 8-11-504] | Y | |
| part 8 | Allowable temperature excursions [Regulation 2-1-403] | Y | |
| part 9 | Allowable temperature excursion recordkeeping [Regulation 2-1-403] | Y | |
| part 10 | Definition of temperature excursion [Regulation 2-1-403] | Y | |
| part 11 | Incinerator Temperature Recordkeeping [BACT] | Y | |
| part 12 | Recordkeeping [Cumulative Increase] | Y | |

## Table IV-E
## Source-Specific Applicable Requirements
## S-5, S-11: Inside Spray Machines, Line 1 & Line 2

| Applicable Requirement | Regulation Title or Description of Requirement | Federally Enforceable (Y/N) | Future Effective Date |
|---|---|---|---|
| **BAAQMD Regulation 6** | **Particulate Matter and Visible Emissions (12/19/90)** | | |
| 6-301 | Ringelmann #1 Limitation | Y | |
| 6-305 | Visible Particles | Y | |
| 6-310 | Particulate Weight Limitation | Y | |
| 6-401 | Appearance of Emissions | Y | |
| **BAAQMD Regulation 8, Rule 11** | **Organic Compounds – Metal Container, Closure And Coil Coating (11/19/97)** | | |

# IV. Source-Specific Applicable Requirements

## Table IV-E
## Source-Specific Applicable Requirements
## S-5, S-11: Inside Spray Machines, Line 1 & Line 2

| Applicable | Regulation Title or | Federally Enforceable | Future Effective |
|---|---|---|---|
| 8-11-301 | Metal Container or Closure Coating Limitations | | |
| 8-11-301.4.1 | VOC Limit – Interior Body Spray | N | |
| 8-11-302 | Emission Control Device Requirement (alternative to coating limits) | Y | |
| 8-11-305 | Alternate Emission Control Plan (optional) | Y | |
| 8-11-306 | Surface Preparation and Cleanup Solvent | Y | |
| 8-11-402 | Operation and Maintenance Plan | Y | |
| 8-11-501 | Coating Records | Y | |
| 8-11-504 | Afterburner Temperature Monitoring (where applicable) | Y | |
| **SIP Regulation 8, Rule 11** | **Organic Compounds – Metal Container, Closure And Coil Coating (12/23/97)** | | |
| 8-11-301 | Metal Container or Closure Coating Limitations | Y[1] | |
| 8-11-301.4 | VOC Limit – Interior Body Spray | Y[1] | |
| **NSPS Part 60** | **Standards of Performance for New Stationary Sources (12/23/71)** | | |
| **Subpart A** | **General Provisions** | | |
| 60.7 | Notification and Record Keeping | Y | |
| 60.8 (a) | Initial Performance Test | Y | |
| 60.9 | Availability of Information | Y | |
| 60.11 (a) | Compliance with standards and maintenance requirements | Y | |
| 60.12 | Circumvention | Y | |
| 60.13 (a)(b)(e)(f)(i) | Monitoring Requirements | Y | |
| **NSPS Subpart WW** | **Standards of Performance for the Beverage Can Surface Coating Industry (8/25/83)** | | |
| 60.492 (c) | VOC Limit – Two-Piece Can Inside Spray | Y | |
| 60.493 (b) | Monthly Performance Test | Y | |
| 60.494 | Monitoring of Operations | Y | |
| 60.495 | Reporting and Recordkeeping | Y | |
| 60.496 | Test Methods and Procedures | Y | |

# IV. Source-Specific Applicable Requirements

## Table IV-E
## Source-Specific Applicable Requirements
## S-5, S-11: Inside Spray Machines, Line 1 & Line 2

| Applicable | Regulation Title or | Federally Enforceable | Future Effective |
|---|---|---|---|
| **BAAQMD Cond #391** | | | |
| part 1 | Facility VOC Limit [Cumulative Increase] | Y | |
| part 4 | Exhaust Duct Vacuum Pressure [BACT] | Y | |
| part 5 | Afterburner VOC Control Efficiency [BACT] | Y | |
| part 6 | Incinerator Temperature [BACT] | Y | |
| part 7 | Incinerator Temperature Monitoriong/Recording [BACT, Regulation 8-11-504] | Y | |
| part 8 | Allowable temperature excursions [Regulation 2-1-403] | Y | |
| part 9 | Allowable temperature excursion recordkeeping [Regulation 2-1-403] | Y | |
| part 10 | Definition of temperature excursion [Regulation 2-1-403] | Y | |
| part 11 | Incinerator Temperature Recordkeeping [BACT] | Y | |
| part 12 | Recordkeeping [Cumulative Increase] | Y | |
| **BAAQMD Cond #16547** | | | |
| part 1 | Particulate Abatement Requirement [Regulation 2-1-403] | Y | |
| part 2 | Quarterly Baghouse Inspection [Regulation 2-1-403] | Y | |
| part 3 | Recordkeeping [Regulation 2-6-501] | Y | |

# IV. Source-Specific Applicable Requirements

## Table IV-F
## Source-Specific Applicable Requirements
## S-6, S-12: Bake Ovens

| Applicable Requirement | Regulation Title or Description of Requirement | Federally Enforceable (Y/N) | Future Effective Date |
|---|---|---|---|
| **BAAQMD Regulation 8, Rule 11** | **Organic Compounds – Metal Container, Closure And Coil Coating (11/19/97)** | | |
| 8-11-301 | Metal Container or Closure Coating Limitations | | |
| 8-11-301.4.1 | VOC Limit – Interior Body Spray | N | |
| 8-11-302 | Emission Control Device Requirement (alternative to coating limits) | Y | |
| 8-11-305 | Alternate Emission Control Plan (optional) | Y | |
| 8-11-402 | Operation and Maintenance Plan | Y | |
| 8-11-504 | Afterburner Temperature Monitoring (where applicable) | Y | |
| **SIP Regulation 8, Rule 11** | **Organic Compounds – Metal Container, Closure And Coil Coating (12/23/97)** | | |
| 8-11-301 | Metal Container or Closure Coating Limitations | Y[1] | |
| 8-11-301.4 | VOC Limit – Interior Body Spray | Y[1] | |
| **NSPS Part 60** | **Standards of Performance for New Stationary Sources (12/23/71)** | | |
| **Subpart A** | **General Provisions** | Y | |
| 60.7 | Notification and Record Keeping | Y | |
| 60.8 (a) | Initial Performance Test | Y | |
| 60.9 | Availability of Information | Y | |
| 60.11 (a) | Compliance with standards and maintenance requirements | Y | |
| 60.12 | Circumvention | Y | |
| 60.13 (a)(b)(e)(f)(i) | Monitoring Requirements | Y | |
| **NSPS Subpart WW** | **Standards of Performance for the Beverage Can Surface Coating Industry (8/25/83)** | | |
| 60.492(c) | VOC Limits | Y | |
| 60.493 (b) | Monthly Performance Test | Y | |
| 60.494 | Monitoring of Operations | Y | |
| 60.495 | Reporting and Recordkeeping | Y | |
| 60.496 | Test Methods and Procedures | Y | |

# IV. Source-Specific Applicable Requirements

## Table IV-F
## Source-Specific Applicable Requirements
## S-6, S-12: Bake Ovens

| Applicable | Regulation Title or | Federally Enforceable | Future Effective |
|---|---|---|---|
| **BAAQMD Cond #391** | | | |
| part 2 | Afterburner Requirement [BACT, Regulation 8-11-302] | Y | |
| part 3 | Automatic Oven Shutdown when Airflow is Lost [BACT] | Y | |
| part 5 | Afterburner VOC Control Efficiency [BACT] | Y | |
| part 6 | Incinerator Temperature [BACT] | Y | |
| part 7 | Incinerator Temperature Monitoring/Recording [BACT, Regulation 8-11-504] | Y | |
| part 8 | Allowable temperature excursions [Regulation 2-1-403] | Y | |
| part 9 | Allowable temperature excursion recordkeeping [Regulation 2-1-403] | Y | |
| part 10 | Definition of temperature excursion [Regulation 2-1-403] | Y | |
| part 11 | Incinerator Temperature Recordkeeping [BACT] | Y | |
| part 12 | Recordkeeping [Cumulative Increase] | Y | |

## Table IV-G
## Source-Specific Applicable Requirements
## S-13, S-14, S-15: Storage Tanks; Basecoat, Overvarnish, Inside Spray

| Applicable Requirement | Regulation Title or Description of Requirement | Federally Enforceable (Y/N) | Future Effective Date |
|---|---|---|---|
| **BAAQMD Regulation 8, Rule 5** | **Storage of Organic Liquids (1/20/93)** | | |
| 8-5-301 | Standards - Storage Tanks Smaller than 150$m^3$ | Y | |
| 8-5-328 | Tank Cleaning Requirements | Y | |
| 8-5-501 | Records | Y | |

# IV. Source-Specific Applicable Requirements

## Table IV-H
## Source-Specific Applicable Requirements
## S-16: Scrap Collection System

| Applicable Requirement | Regulation Title or Description of Requirement | Federally Enforceable (Y/N) | Future Effective Date |
|---|---|---|---|
| **BAAQMD Regulation 6** | **Particulate Matter and Visible Emissions (12/19/90)** | | |
| 6-301 | Ringelmann #1 Limitation | Y | |
| 6-305 | Visible Particles | Y | |
| 6-310 | Particulate Weight Limitation | Y | |
| 6-401 | Appearance of Emissions | Y | |

## Table IV-I
## Source-Specific Applicable Requirements
## S-17: Lime Silo

| Applicable Requirement | Regulation Title or Description of Requirement | Federally Enforceable (Y/N) | Future Effective Date |
|---|---|---|---|
| **BAAQMD Regulation 6** | **Particulate Matter and Visible Emissions (12/19/90)** | | |
| 6-301 | Ringelmann #1 Limitation | Y | |
| 6-305 | Visible Particles | Y | |
| 6-310 | Particulate Weight Limitation | Y | |
| 6-401 | Appearance of Emissions | Y | |
| **BAAQMD Cond #16548** | | | |
| part 1 | Particulate Abatement Requirement [Regulation 2-1-403] | Y | |
| part 2 | Annual Visible Emissions Inspection [Regulation 2-1-403] | Y | |
| part 3 | Recordkeeping [Regulation 1-441] | Y | |

1 This section has been removed from BAAQMD Regulations because it has been superseded. Nevertheless, the source must comply with this regulation until US EPA has reviewed and approved (or disapproved) the District's revision of the regulation.

# V. SCHEDULE OF COMPLIANCE

The permit holder shall continue to comply with all applicable requirements cited in this permit. The permit holder shall also comply with applicable requirements that become effective during the term of this permit.

# VI. PERMIT CONDITIONS

Any condition that is preceded by an asterisk is not federally enforceable.

**Condition #391**

For Sources: 1 through 12 (Beverage Can Coating Sources)

EMISSIONS

1. Total VOC emissions due to coating usage and clean-up solvent usage at this facility shall not exceed 39.2 tons/year. (basis: Cumulative Increase)

VOC ABATEMENT

2. VOC emissions from the following sources shall be collected and controlled by a direct flame incineration afterburner during all periods of operation: (basis: BACT, Regulation 8-11-302)

   Basecoater Pin Ovens (Sources 2 and 8)
   Printer Pin Ovens (Sources 4 and 10)
   Inside Bake Ovens (Sources 6 and 12)
   Enclosed Inside Spray Machine Banks (Sources 5 and 11) including the enclosed doubling boxes between spray machines and vacuum elevators

3. The Basecoater Pin Ovens S-2 and S-8, the Printer Pin Ovens S-4 and S-10, and the Inside Bake Ovens S-6 and S-12 shall not be operated unless ducted and vented as designed to the Direct Flame Afterburner A-1. The ducting from each oven shall be equipped with an airflow switch electrically connected to the oven control panel. In the event of a loss of airflow due to mechanical failure, the affected oven shall automatically shut down and all can production at the affected line shall cease. (basis: BACT)

4. In order to demonstrate adequate VOC collection at the Inside Spray Machine Banks S-5 and S-11 (as described above), monitoring devices shall

# VI. Permit Conditions

**Condition #391**
For Sources: 1 through 12 (Beverage Can Coating Sources)

be installed in the ducting from the inside spray machine banks, the enclosed doubling boxes between spray machines, and the vacuum elevators for each line. A magnahelic gauge or other approved device shall be installed and maintained downstream of each affected exhaust duct to indicate negative pressure at the duct. A minimum vacuum pressure of 0.2 inches of water column (as indicated by the monitoring devices) shall be maintained throughout the system. (basis: BACT)

5. The VOC emission control efficiency of the incinerator shall be maintained at a minimum of 95% whenever the inlet concentration of VOC to the incinerator is equal to or greater than 500 ppm, measured as methane. National Can shall be charged for all uncontrolled emissions during periods of afterburner failure towards compliance with Condition #1 above. (basis: BACT)

6. A minimum incinerator temperature of 1450 $^{o}$F shall be maintained at all times when the incinerator is required to be in operation as specified in Condition #5. (basis: BACT)

7. In order to insure that a minimum average incinerator temperature of 1450 $^{o}$F is maintained, the incinerator shall be equipped with continuous temperature measuring and recording instrumentation, consisting of at least three thermocouple temperature probes in the incinerator and at least one recording device, which will continuously record the incinerator temperature as measured by each of the three thermocouples. (basis: BACT, Regulation 8-11-504)

8. The temperature limit in part 6 shall not apply during an "Allowable Temperature Excursion", provided that the temperature controller setpoint complies with the temperature limit. An Allowable Temperature Excursion is one of the following:

   a. A temperature excursion not exceeding 20 degrees F; or
   b. A temperature excursion for a period or periods which when combined are less than or equal to 15 minutes in any hour; or
   c. A temperature excursion for a period or periods which when combined are more than 15 minutes in any hour, provided that all three of the following criteria are met.

      i. the excursion does not exceed 50 degrees F;

# VI. Permit Conditions

**Condition #391**
For Sources: 1 through 12 (Beverage Can Coating Sources)

ii. the duration of the excursion does not exceed 24 hours; and
iii. the total number of such excursions does not exceed 12 per calendar year (or any consecutive 12 month period).

Two or more excursions greater than 15 minutes in duration occurring during the same 24-hour period shall be counted as one excursion toward the 12 excursion limit. (basis: Regulation 2-1-403)

9. For each Allowable Temperature Excursion that exceeds 20 degrees F. and 15 minutes in duration, the Permit Holder shall keep sufficient records to demonstrate that they meet the qualifying criteria described above. Records shall be retained for a minimum of five years from the date of entry, and shall be made available to the District upon request. Records shall include at least the following information:

a. Temperature controller setpoint;
b. Starting date and time, and duration of each Allowable Temperature Excursion;
c. Measured temperature during each Allowable Temperature Excursion;
d. Number of Allowable Temperature Excursions per month, and total number for the current calendar year; and
e. All strip charts or other temperature records.
(basis: Regulation 2-1-403)

10. For the purposes of parts 8 and 9, a temperature excursion refers only to temperatures below the limit.

11. The temperature data collected from this instrumentation shall be maintained in a file which shall be available for District inspection for a period of at least 60 months following the date on which such data or reports are recorded or made. (basis: BACT, Regulation 2-6-501)

RECORDKEEPING AND REPORTING

12a. The following data shall be maintained on a daily basis: (basis: Cumulative Increase, Regulation 2-6-501)

Operating time of Coating Lines 1 and 2
**Condition #391**

# VI. Permit Conditions

For Sources: 1 through 12 (Beverage Can Coating Sources)

Can production for each line (cans/day)
Amount and type of coating used for Basecoat,
Inside Spray and overvarnish.
A recorded value from each exhaust duct vacuum monitoring device.

b. The following data shall be maintained on a weekly basis: (basis: Cumulative Increase)

Amount of clean-up solvent used,
Amount of Bottom Rim Varnish.

c. These records shall be available for District inspection for a period of at least 60 months following the date which such data or reports are recorded.

**Condition #16547**
For Sources 5 and 11, Inside Spray Machines, Line 1 & Line 2

1. All particulate matter emissions from these sources shall be routed to A2, Pulse Jet Baghouse. (basis: Regulation 2-1-403)

2. The baghouse shall be inspected quarterly to ensure proper operation. The following items shall be checked:

   a. The baghouse exhaust shall be checked for evidence of particulate breakthrough. If breakthrough is evident from dust buildup in the duct, the filter bags shall be checked for any tears, holes, abrasions, and scuffs, and replaced as needed.
   b. All hoppers shall be discharged in a timely manner.
   c. The pulsejet cleaning system shall be maintained and operated in accordance with the manufacturer's recommendations.

   (basis: Regulation 2-1-403)

3. In order to demonstrate compliance with the above permit conditions, the following records shall be maintained in a District approved log. These records shall be kept on site and made available for District inspection for a period of at least five years from the date on which a record is made.

   a. Records of all inspections and all maintenance work including bag replacement for the baghouse. Records of each inspection shall consist of a

**Condition #16547**

# VI. Permit Conditions

For Sources 5 and 11, Inside Spray Machines, Line 1 & Line 2

log containing the date of inspection and the initials of the personnel that inspects the baghouse.
(basis: Regulation 2-6-501)

**Condition #16548**
For Source 17, Lime Silo

1. Particulate matter emissions during loading operations from Source 17, Lime Silo, shall be controlled by A8, Lime Silo Baghouse. (basis: Regulation 2-1-403)

2. A8, Lime Silo Baghouse, shall be checked for visible emissions on an annual basis. The visible emissions check shall take place while the equipment is operating and during daylight hours. If any visible emissions are detected, the operator shall take corrective action, and check for visible emissions during the next loading event. If no visible emissions are detected, the operator shall continue to check for visible emissions every year. (basis: Regulation 2-6-501)

3. The operator shall keep records of all visible emissions checks, the person performing the check, and all maintenance performed on A-8, Lime Silo Baghouse. The records shall be retained for five (5) years and shall be made available to District personnel upon request. (basis: Regulation 2-6-501)

# VII. APPLICABLE LIMITS & COMPLIANCE MONITORING REQUIREMENTS

This section has been included only to summarize the applicable emission limits contained in Section IV, Source-Specific Applicable Requirements, of this permit. The following tables show the relationship between each emission limit and the associated compliance monitoring provisions, if any. The monitoring frequency indicates whether periodic (P) or continuous (C) monitoring is required. For periodic monitoring, the frequency of the monitoring has also been shown, either annual (A), quarterly (Q), monthly (M), daily (D), or on an event basis (E). No monitoring (N) has been required if the current applicable rule or regulation does not require monitoring, and the operation is unlikely to deviate from the applicable emission limit based upon the nature of the operation.

**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 | FE Y/N | Future Effective Date | Emission Limit | Monitoring Requirement Citation | Monitoring Frequency (P/C/N) | Monitoring Type |
|---|---|---|---|---|---|---|---|
| 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 |
| | BAAQMD 8-11-302 (alternative to 8-11-301.3) | Y | | Abatement Device efficiency ≥90% | BAAQMD 8-11-504 | C | Temperature of incineration unit |
| | 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 submittal – Excess emissions reporting |

# VII. Applicable Limits & Compliance Monitoring Requirements

## 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 | FE Y/N | Future Effective Date | Emission Limit | Monitoring Requirement Citation | Monitoring Frequency (P/C/N) | Monitoring Type |
|---|---|---|---|---|---|---|---|
| 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 |
| | Condition #391, part 1 | Y | | 39.2 tons/yr, facility limit | Condition #391, part 9(a) | P/D | Operating time, Can production rate, Amount of coating used |

## 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) | Monitoring Type |
|---|---|---|---|---|---|---|---|
| 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 |

# VII. Applicable Limits & Compliance Monitoring Requirements

## 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) | Monitoring Type |
|---|---|---|---|---|---|---|---|
| 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 |
| | 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 |
| | Condition #391, part 1 | Y | | 39.2 tons/yr, facility limit | Condition #391, part 9(a) | P/D | Operating time, Can production rate, Amount of coating used |
| | Condition #391, part 5 | Y | | Abatement Device efficiency ≥95% | Condition #391, part 7 | C | Temperature of incineration unit |
| | Condition #391, part 6 | Y | | Minimum Incinerator Temperature of 1450 degrees F | Condition #391, part 7 | C | Temperature of incineration unit |

# VII. Applicable Limits & Compliance Monitoring Requirements

**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 |
|---|---|---|---|---|---|---|---|
| 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 |
| | 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 |
| | 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 |
| | 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 submittal – Excess emissions reporting |
| | 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 |

# VII. Applicable Limits & Compliance Monitoring Requirements

## 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 |
|---|---|---|---|---|---|---|---|
| VOC | NSPS Subpart WW, 60.492 (b) | Y | | Overvarnish: 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 |
| | Condition #391, part 1 | Y | | 39.2 tons/yr, facility limit | Condition #391, part 9(a) | P/D | Operating time, Can production rate, Amount of coating used |

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

| Type of Limit | Emission Limit Citation | FE Y/N | Future Effective Date | Emission Limit | Monitoring Requirement Citation | Monitoring Frequency (P/C/N) | Monitoring Type |
|---|---|---|---|---|---|---|---|
| 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 |
| | 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 |

# VII. Applicable Limits & Compliance Monitoring Requirements

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

| Type of Limit | Emission Limit Citation | FE Y/N | Future Effective Date | Emission Limit | Monitoring Requirement Citation | Monitoring Frequency (P/C/N) | Monitoring Type |
|---|---|---|---|---|---|---|---|
| VOC | 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 |
| | SIP 8-11-301.9 | Y | | Inks: 300 g/l (2.5 lb/gal) of coating applied, excluding water | BAAQMD 8-11-501 | P/D | Coating records |
| | 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) | P/M | Coating records, Initial performance test, Monthly operating parameters |
| | Condition #391, part 1 | Y | | 39.2 tons/yr, facility limit | Condition #391, part 9(a) | P/D | Operating time, Can production rate, Amount of coating used |
| VOC | Condition #391, part 5 | Y | | Abatement Device efficiency ≥95% | Condition #391, part 7 | C | Temperature of incineration unit |
| | Condition #391, part 6 | Y | | Minimum Incinerator Temperature of 1450 degrees F | Condition #391, part 7 | C | Temperature of incineration unit |

# VII. Applicable Limits & Compliance Monitoring Requirements

**Table VII-E**
**Applicable Limits and Compliance Monitoring Requirements**
**S-5, S-11: Inside Spray Machines, 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 |
|---|---|---|---|---|---|---|---|
| VOC | BAAQMD 8-11-301.4.1 | N | | Interior Body Spray: 420 g/l (3.5 lb/gal) of coating applied, excluding water | BAAQMD 8-11-501 | P/D | Coating records |
| | BAAQMD 8-11-302 (alternative to 8-11-301.4) | Y | | Abatement Device efficiency ≥90% | BAAQMD 8-11-504 | C | Temperature of incineration unit |
| | 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 submittal – Excess emissions reporting |
| | 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 | Coating records |
| | 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 |

# VII. Applicable Limits & Compliance Monitoring Requirements

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

| Type of | Emission Limit | FE | Future Effective | | Monitoring Requirement | Monitoring Frequency | Monitoring |
|---|---|---|---|---|---|---|---|
| VOC | Condition #391, part 1 | Y | | 39.2 tons/yr, facility limit | Condition #391, part 9(a) | P/D | Operating time, Can production rate, Amount of coating used |
| | Condition #391, part 5 | Y | | Abatement Device efficiency ≥95% | Condition #391, part 4 | P/D | Ventilation System negative pressure monitoring |
| | Condition #391, part 5 | Y | | Abatement Device efficiency ≥95% | Condition #391, part 7 | C | Temperature of incineration unit |
| | Condition #391, part 6 | Y | | Minimum Incinerator Temperature of 1450 degrees F | Condition #391, part 7 | C | Temperature of incineration unit |
| TSP | Regulation 6-301 | Y | | Ringelmann 1.0 | | N | |
| | Regulation 6-310 | Y | | 0.15 gr/dscf | Condition #16547, part 2 | P/Q | Baghouse Inspection |

# VII. Applicable Limits & Compliance Monitoring Requirements

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

| Type of Limit | Emission Limit Citation | FE Y/N | Future Effective Date | Emission Limit | Monitoring Requirement Citation | Monitoring Frequency (P/C/N) | Monitoring Type |
|---|---|---|---|---|---|---|---|
| VOC | BAAQMD 8-11-301.4.1 | N | | Interior Body Spray: 420 g/l (3.5 lb/gal) of coating applied, excluding water | BAAQMD 8-11-501 | P/D | Coating records |
| | BAAQMD 8-11-302 (alternative to 8-11-301.4) | Y | | Abatement Device efficiency ≥90% | BAAQMD 8-11-504 | C | Temperature of incineration unit |
| | SIP 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 |
| | Condition #391, part 1 | Y | | 39.2 tons/yr, facility limit | Condition #391, part 9(a) | P/D | Operating time, Can production rate, Amount of coating used |
| | Condition #391, part 5 | Y | | Abatement Device efficiency ≥95% | Condition #391, part 7 | C | Temperature of incineration unit |

# VII. Applicable Limits & Compliance Monitoring Requirements

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

| Type of Limit | Emission Limit Citation | FE Y/N | Future Effective Date | Emission Limit | Monitoring Requirement Citation | Monitoring Frequency (P/C/N) | Monitoring Type |
|---|---|---|---|---|---|---|---|
| VOC | Condition #391, part 6 | Y | | Minimum Incinerator Temperature of 1450 degrees F | Condition #391, part 7 | C | Temperature of incineration unit |

## 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 |
|---|---|---|---|---|---|---|---|
| TSP | Regulation 6-301 | Y | | Ringelmann 1.0 | | N | |
| | Regulation 6-310 | Y | | 0.15 gr/dscf | | N | |

# VII. Applicable Limits & Compliance Monitoring Requirements

**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 |
|---|---|---|---|---|---|---|---|
| TSP | Regulation 6-301 | Y | | Ringelmann 1.0 | Condition #16548, part 2, 3 | P/A | Visible Emissions Checks, Records for S-17 |
| | Regulation 6-310 | Y | | 0.15 gr/dscf | | N | |

# VIII. TEST METHODS

The test methods associated with the emission limit of a District regulation are generally found in Section 600 of the regulation. The following table indicates only the test methods associated with the emission limits referenced in Section VII - Applicable Emission Limits & Compliance Monitoring Requirements.

**Table VIII**
**Test Methods**

| Applicable Requirement | Description of Requirement | Acceptable Test Methods |
|---|---|---|
| BAAQMD 6-301 | Ringelmann No. 1 Limitation | Manual of Procedures, Volume I, Evaluation of Visible Emissions |
| BAAQMD 6-310 | Particulate Weight Limitation | Manual of Procedures, Volume IV, ST-15, Particulates Sampling |
| BAAQMD 8-11-301.3 | Basecoat / Overvarnish VOC Limit | Manual of Procedures, Volume III, Method 21, Determination of Compliance of Volatile Organic Compounds for Water Reducible Coatings<br>or Method 22, Determination of Compliance of Volatile Organic Compounds for Solvent Based Coatings, Inks and Other Related Products |
| BAAQMD 8-11-301.4 | Interior Body Spray VOC Limit | Manual of Procedures, Volume III, Method 21, Determination of Compliance of Volatile Organic Compounds for Water Reducible Coatings<br>or Method 22, Determination of Compliance of Volatile Organic Compounds for Solvent Based Coatings, Inks and Other Related Products |
| BAAQMD 8-11-301.9 | Ink VOC Limit | Manual of Procedures, Volume III, Method 21, Determination of Compliance of Volatile Organic Compounds for Water Reducible Coatings<br>or Method 22, Determination of Compliance of Volatile Organic Compounds for Solvent Based Coatings, Inks and Other Related Products |
| BAAQMD 8-11-302 | Emission Control Device Limitation | Manual of Procedures, Volume IV, ST-7, "Organic Compounds" or EPA Method 25 "Determination of Total Gaseous Nonmethane Organic Emissions as Carbon" or 25A "Determination of Total Gaseous Organic Concentration Using a Flame Ionization Analyzer" |
| SIP 8-11-301.4 | Interior Body Spray VOC Limit | Manual of Procedures, Volume III, Method 21, Determination of Compliance of Volatile Organic Compounds for Water Reducible Coatings<br>or Method 22, Determination of Compliance of Volatile Organic Compounds for Solvent Based Coatings, Inks and Other Related Products |

# VIII. Test Methods (continued)

## Table VIII
## Test Methods

| Applicable Requirement | Description of Requirement | Acceptable Test Methods |
|---|---|---|
| SIP 8-11-301.9 | Ink VOC Limit | Manual of Procedures, Volume III, Method 21, Determination of Compliance of Volatile Organic Compounds for Water Reducible Coatings or Method 22, Determination of Compliance of Volatile Organic Compounds for Solvent Based Coatings, Inks and Other Related Products |
| BAAQMD Cond. #391, part 4 | Incinerator Abatement Control Efficiency | Manual of Procedures, Volume IV, ST-7, "Organic Compounds" or EPA Method 25 "Determination of Total Gaseous Nonmethane Organic Emissions as Carbon" or 25A "Determination of Total Gaseous Organic Concentration Using a Flame Ionization Analyzer" |
| NSPS Subpart WW | Standards of Performance for the Beverage Can Surface Coating Industry (8/25/83) | |
| 60.492 | Standards for VOCs | EPA Method 24 "Determination of Volatile Matter Content, Water Content, Density, Volume Solids, and Weight Solids of Surface Coatings"; or Approved Equivalent or Alternative Method |

# IX. REVISION HISTORY

| | |
|---|---|
| Initial Permit Issuance: | July 28, 1999 |
| Administrative Amendment:<br>Facility name changed from American National Can to Rexam Beverage Can Company: | February 19, 2003 |

# X. GLOSSARY

**BAAQMD**
Bay Area Air Quality Management District

**BACT**
Best Available Control Technology

**CAA**
The federal Clean Air Act

**CAAQS**
California Ambient Air Quality Standards

**CEQA**
California Environmental Quality Act

**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

**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

**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.

**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.

# X. Glossary

**Major Facility**
A facility with potential emissions of regulated air pollutants greater than 100 tons per year, greater than 10 tons per year of any single hazardous air pollutant, and/or greater than 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.

**NAAQS**
National Ambient Air Quality Standards

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

**NMHC**
Non-methane Hydrocarbons

**NOx**
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.)

**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, NOx, 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**

# X. Glossary

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.

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

**SO2**
Sulfur dioxide

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

**TSP**
Total Suspended Particulate

**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 |

# XI. APPLICABLE STATE IMPLEMENTATION PLAN

The Bay Area Air Quality Management District's portion of the State Implementation Plan can be found at EPA Region 9's website. The address is:

http://yosemite1.epa.gov/r9/r9sips.nsf/California?ReadForm&Start=1&Count=30&Expand=3.1