

Bay Area Air Quality Management District

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

Final

MAJOR FACILITY REVIEW PERMIT

Issued To:

Silgan Containers Mfg. Corp.
Facility #B0989

Facility Address:

2200 Wilbur Avenue
Antioch, CA 94509

Mailing Address:

2200 Wilbur Avenue
Antioch, CA 94509

Responsible Official

Ray McMurry
925-778-8000

Facility Contact

Bob Bennett
209-863-3116

Type of Facility: Metal Sheet Coating

Primary SIC: 3479

Product: Coated Metal Sheets

BAAQMD Permit Division Contact:

Thu Bui

ISSUED BY THE BAY AREA AIR QUALITY MANAGEMENT DISTRICT

Signed by Jack P. Broadbent

Jack P. Broadbent, Executive Officer/Air Pollution Control Officer

February 5, 2004

Date

TABLE OF CONTENTS

I.	STANDARD CONDITIONS	3
II.	EQUIPMENT	7
III.	GENERALLY APPLICABLE REQUIREMENTS.....	8
IV.	SOURCE-SPECIFIC APPLICABLE REQUIREMENTS	10
V.	SCHEDULE OF COMPLIANCE	16
VI.	PERMIT CONDITIONS	16
VII.	APPLICABLE LIMITS & COMPLIANCE MONITORING REQUIREMENTS	20
VIII.	TEST METHODS	24
IX.	REVISION HISTORY	25
X.	PERMIT SHIELD	26
XI.	GLOSSARY	27
XII.	APPLICABLE STATE IMPLEMENTATION PLAN	31

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 5/2/01);
- SIP Regulation 1 - General Provisions and Definitions
(as approved by EPA through 6/28/99);
- BAAQMD Regulation 2, Rule 1 - Permits, General Requirements
(as amended by the District Board on 8/1/01);
- 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 5/17/00);
- 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 5/17/00)
- SIP Regulation 2, Rule 4 - Permits, Emissions Banking
(as approved by EPA through 1/26/99), and
- BAAQMD Regulation 2, Rule 6 - Permits, Major Facility Review
(as amended by the District Board on 4/16/03).

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

1. This Major Facility Review Permit was issued on February 6, 2001 and expires on January 31, 2006. The permit holder shall submit a complete application for renewal of this Major Facility Review Permit no later than July 31, 2005 and no earlier than January 31, 2005. **If a complete application for renewal has not been submitted in accordance with this deadline, the facility may not operate after January 31, 2006.** (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)

I. Standard Conditions

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)
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)
11. The responsible official shall certify all documents submitted by the facility pursuant to the major facility review permit. The certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. The certifications shall be signed by a responsible official for the facility. (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

1. The permit holder must provide any information, records, and reports requested or specified by the APCO. (Regulation 1-441, Regulation 2-6-409.4)

I. Standard Conditions

2. 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

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. The first reporting period for this permit shall be February 6, 2001 to July 31, 2001. The report shall be submitted by August 31, 2001. Subsequent reports shall be for the following periods: August 1st through January 31st and February 1st through July 31st, and are due on the last day of the month after the end of the reporting period. 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 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 period will be February 1st to January 31st of each year. The certification shall be submitted by February 28th of each year. 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)

I. Standard Conditions

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 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. (MOP Volume II, Part 3, §4.8)
3. The granting by the District of breakdown relief or the issuance by the Hearing Board of a variance will not provide relief from federal enforcement. (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)

J. Miscellaneous Conditions

1. The maximum capacity for each source as shown in Table II-A is the maximum allowable capacity. Exceedance of the maximum allowable capacity for any source is a violation of Regulation 2, Rule 1, Section 301. (Regulation 2-1-301)

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. The capacities in this table are the maximum allowable capacities for each source, pursuant to Standard Condition I.J and Regulation 2-1-301.

S-#	Description	Make or Type	Model	Capacity
1	No. 1 Coater equipped with either Anilox single-roller or Wagner two-roller, and the back roller cleaning system may be either a solvent flood, brush, felt bar or a solvent-less scraper system	Roller type		¹ Usage of 104,720 gallons coating and solvent per year for all sources
2	Oven for #1 Coater (natural gas)		Wagner	5 mmbtu/hr
3	No. 2 Coater equipped with either Anilox single-roller or Wagner two-roller, and the back roller cleaning system may be either a solvent flood, brush, felt bar or a solvent-less scraper system	Roller type		¹ Usage of 104,720 gallons coating and solvent per year for all sources
4	Oven for #2 Coater (natural gas)		Wagner	5 mmbtu/hr
5	Spent Solvent Storage Tank			2300 gal

¹Usage limit applies unless the operator of this source can demonstrate that a change in coating usage and/or composition would not result in emissions of VOC exceeding 32.9 tons/year pursuant to Condition 2370, part 2.

Table II B – Abatement Devices

A-#	Description	Source(s) Controlled	Applicable Requirement	Operating Parameters	Limit or Efficiency
1	Oxidizer	S1, S2, S3, S4	BAAQMD 8-11-302	Temperature: > 1450° F.	90% destruction
	Oxidizer	S1, S2, S3, S4	BAAQMD Cond #2370, Part 5	Temperature: > 1450° F.	98.5% destruction

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 parentheses 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 of Directors
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 language of SIP requirements is on EPA Region 9’s website. The address is included at the end of this permit.

NOTE:

There are differences between the current BAAQMD rules and the version of the rules 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 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 (5/2/01)	N
SIP Regulation 1	General Provisions and Definitions (8/27/99)	Y
BAAQMD Regulation 2, Rule 1	General Requirements (8/1/01)	N
BAAQMD 2-1-429	Federal Emissions Statement (6/7/95)	Y
SIP Regulation 2, Rule 1	General Requirements (1/26/99)	Y
BAAQMD Regulation 5	Open Burning (3/6/02)	N
SIP Regulation 5	Open Burning (9/4/98)	Y

III. Generally Applicable Requirements

**Table III
 Generally Applicable Requirements**

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)
BAAQMD Regulation 6	Particulate Matter and Visible Emissions (12/19/90)	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
BAAQMD Regulation 8, Rule 51	Organic Compounds - Adhesive and Sealant Products (7/17/02)	N
SIP Regulation 8, Rule 51	Organic Compounds - Adhesive and Sealant Products (2/26/02)	Y
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
SIP Regulation 12, Rule 4	Miscellaneous Standards of Performance - Sandblasting (9/2/81)	Y
California Health and Safety Code Section 44300 et seq.	Air Toxics "Hot Spots" Information and Assessment Act of 1987	N
40 CFR Part 61, Subpart M	National Emission Standards for Hazardous Air Pollutants – National Emission Standard for Asbestos (6/19/95)	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 parentheses 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 of Directors
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. The full language of SIP requirements is on EPA Region 9's website. The address is included at the end of this permit. All other text may be found in the regulations themselves.

Table IV - A
Source-specific Applicable Requirements
S1, NO. 1 COATER;
S2, NO. 2 COATER

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
BAAQMD Regulation 1	General Provisions and Definitions (5/2/01)		
1-523	Parametric Monitoring and Recordkeeping Procedures	Y	
1-523.1	Parametric monitor periods of inoperation	Y	
1-523.2	Limits on periods of inoperation	Y	
1-523.3	Reports of Violations	N	
1-523.4	Records	Y	
1-523.5	Maintenance and calibration	N	
SIP Regulation 1	General Provisions and Definitions (6/28/99)		
1-523	Parametric Monitoring and Recordkeeping Procedures	Y ¹	
1-523.3	Reports of Violations	Y ¹	
1-523.5	Maintenance and calibration	Y ¹	

IV. Source Specific Applicable Requirements

Table IV - A
Source-specific Applicable Requirements
S1, NO. 1 COATER;
S2, NO. 2 COATER

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 9, Rule 1	Inorganic Gaseous Pollutants, Sulfur Dioxide Emissions Limitations (3/15/95)		
9-1-301	Limitations on Ground Level Concentrations	Y	
9-1-302	General Emission Limitation	Y	
BAAQMD Regulation 8, Rule 11	Organic Compounds – Metal Container, Closure and Coil Coating (11/19/97)		
8-11-302	Emission Control Device Requirement	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	Y	
BAAQMD Condition #2370			
Part 1	POC Emission Limit (BACT)	Y	
Part 2	Coating and Solvent Usage Limit (BACT, Cumulative Increase)	Y	
Part 3	Capture and Control Requirement (BACT)	Y	
Part 4	Requirement for Afterburner (BACT)	Y	
Part 5	POC Destruction Efficiency Requirement (BACT)	Y	
Part 6	Afterburner Maintenance and Minimum Temperature Requirement (BACT)	Y	
Part 7	Temperature Monitoring and Recording (BACT)	Y	
Part 8	Allowable Temperature Excursions (basis: Regulation 2-1-403)	Y	
Part 9	Temperature Excursion Records (basis: Regulation 2-1-403)	Y	

IV. Source Specific Applicable Requirements

Table IV - A
Source-specific Applicable Requirements
S1, NO. 1 COATER;
S2, NO. 2 COATER

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
Part 10	Temperature Excursion Definition (basis: Regulation 2-1-403)	Y	
Part 11	Temperature Records (BACT)	Y	
Part 12	Intake velocity measurements (2-6-501)	Y	
Part 13	Recordkeeping (BACT)	Y	
Part 14	Limitation on Shipments Received by Rail (Cumulative Increase)	Y	
Part 15	POC Emissions Limited to Less than 50 tons per year (Offsets)	Y	

¹This 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.

IV. Source Specific Applicable Requirements

Table IV - B
Source-specific Applicable Requirements
S2, OVEN FOR #1 COATER;
S4, OVEN FOR #2 COATER

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
BAAQMD Regulation 1	General Provisions and Definitions (5/2/01)		
1-523	Parametric Monitoring and Recordkeeping Procedures	Y	
1-523.1	Parametric monitor periods of inoperation	Y	
1-523.2	Limits on periods of inoperation	Y	
1-523.3	Reports of Violations	N	
1-523.4	Records	Y	
1-523.5	Maintenance and calibration	N	
SIP Regulation 1	General Provisions and Definitions (6/28/99)		
1-523	Parametric Monitoring and Recordkeeping Procedures	Y ¹	
1-523.3	Reports of Violations	Y ¹	
1-523.5	Maintenance and calibration	Y ¹	
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 9, Rule 1	Inorganic Gaseous Pollutants, Sulfur Dioxide Emissions Limitations (3/15/95)		
9-1-301	Limitations on Ground Level Concentrations	Y	
9-1-302	General Emission Limitation	Y	
BAAQMD Regulation 8, Rule 11	Organic Compounds – Metal Container, Closure and Coil Coating (11/19/97)		
8-11-302	Emission Control Device Requirement	Y	
8-11-306	Surface Preparation and Cleanup solvent	Y	
8-11-402	Operation and Maintenance Plan	Y	
8-11-504	Afterburner Temperature Monitoring	Y	

IV. Source Specific Applicable Requirements

Table IV - B
Source-specific Applicable Requirements
S2, OVEN FOR #1 COATER;
S4, OVEN FOR #2 COATER

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
BAAQMD Condition #2370			
part 1	POC Emission Limit (BACT)	Y	
part 2	Coating and Solvent Usage Limit (BACT, Cumulative Increase)	Y	
part 3	Capture and Control Requirement (BACT)	Y	
part 4	Requirement for Afterburner (BACT)	Y	
part 5	POC Destruction Efficiency Requirement (BACT)	Y	
part 6	Afterburner Maintenance and Minimum Temperature Requirement (BACT)	Y	
part 7	Temperature Monitoring and Recording (BACT)	Y	
Part 8	Allowable Temperature Excursions (basis: Regulation 2-1-403)	Y	
Part 9	Temperature Excursion Records (basis: Regulation 2-1-403)	Y	
Part 10	Temperature Excursion Definition (basis: Regulation 2-1-403)	Y	
Part 11	Temperature Records (BACT)	Y	
Part 12	Intake velocity measurements (2-6-501)	Y	
Part 13	Recordkeeping (BACT)	Y	
Part 14	Limitation on Shipments Received by Rail (Cumulative Increase)	Y	
Part 15	POC Emissions Limited to Less than 50 tons per year (Offsets)	Y	

¹This 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.

IV. Source Specific Applicable Requirements

Table IV – C
Source-specific Applicable Requirements
S5, SPENT SOLVENT STORAGE TANK

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
BAAQMD Regulation 8, Rule 5	Storage of Organic Liquids (1/1/93)		
8-5-301	Storage Tanks Smaller than 150m ³	Y	
8-5-501	Records	Y	
BAAQMD Condition #10946			
part 1	Throughput Limit (Cumulative Increase)	Y	
part 2	Vapor Pressure Limit (Cumulative Increase)	Y	
part 3	Recordkeeping (Cumulative Increase)	Y	

V. SCHEDULE OF COMPLIANCE

The permit holder shall 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 on a timely basis.

VI. PERMIT CONDITIONS

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

Condition 2370

For S-1, S-2, S-3 and S-4
(Applications 13030 & 15645)

1. In no event shall the total combined daily and annual emissions from S-1, S-2, S-3, and S-4 exceed 32.9 tons/year Precursor Organic Compounds (POC). [basis: BACT]
2. The total coating and solvent usage at this facility shall not exceed 104,720 gallons/year unless the operator of this source can demonstrate that a change in coating usage and/or composition would not result in emissions exceeding those stipulated in Part #1. [basis: BACT, Cumulative Increase]
3. VOC emissions from coatings used at sources S-1, S-2, S-3 and S-4 shall be controlled by at least 90% on a mass basis overall (capture and destruction efficiencies combined). [basis: BACT]
4. Precursor Organic Compound (POC) emissions from S-1, S-2, S-3, and S-4 shall be controlled by a Direct Flame Afterburner, A-1 during all periods of operation. [basis: BACT]
5. The Precursor Organic Compound destruction efficiency of the afterburner shall be maintained at a minimum of 98.5%, by weight. [basis: BACT]
6. Afterburner, A-1, shall be properly maintained and kept in good operating condition at all times. In no event shall the afterburner temperature (average of the three thermocouples) be less than 1450 degrees F. when S-1, S-2, S-3, and/or S-4 are in operation, unless the permit holder can demonstrate to the satisfaction of the APCO that the permit conditions can be met with the afterburner operating at a lower temperature. The temperature shall be automatically controlled at all times during operation of S-1, S-2, S-3, and/or S-4. [basis: BACT]

VI. Permit Conditions

Condition 2370

For S-1, S-2, S-3 and S-4
(Applications 13030 & 15645)

7. To determine compliance with Part #6, the afterburner shall be equipped with continuous measuring and recording instrumentation consisting of at least 3 thermocouple temperature probes in the afterburner and at least one recording device, which will continuously record the afterburner temperature as measured by each of the 3 probes. [basis: BACT]

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;
 - 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;

VI. Permit Conditions

Condition 2370

For S-1, S-2, S-3 and S-4
(Applications 13030 & 15645)

- 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 the temperature recorder shall be maintained in a file which shall be available for District inspection for a period of at least five years following the date on which such data or reports are recorded or made. [basis: BACT]
12. To ensure emissions capture, the average intake flow velocities (face velocity) at each emissions collection point for the above sources shall be 100 ft/min or more.

The owner/operator shall verify the face velocity at each collection point on a quarterly basis. (Basis: Regulation 2-6-501)

13. To determine compliance, the operator of this source shall maintain the following data on a daily basis:
- a. operating time of Coating Lines 1 & 2.
 - b. amount and type of coating applied, by use of a daily measurement and a daily District approved log.
 - c. amount of clean-up solvent used.
 - d. a list of all products coated per day and the sheet production rate for each product (sheets/day).
 - e. film thickness requirements of product being coated.
 - f. charts from the afterburner temperature recorder.
 - g. all invoice records of coatings and solvents purchased.
 - h. thinning ratios for respective coatings being thinned.
- Records shall be available for District inspection for a period of at least five years following the date on which such data or reports are recorded or made. [basis: BACT, Cumulative Increase]

VI. Permit Conditions

Condition 2370

For S-1, S-2, S-3 and S-4
(Applications 13030 & 15645)

14. Rail shipments/receipts from/to the permit holder shall not exceed 50,000 tons during any consecutive 12-month period. A District approved log shall be kept for all rail activity at the facility.
[basis: Cumulative Increase]
15. In accordance with the provisions of Regulation 2-3-414, should the facility precursor organic compound (POC. emissions ever equal or exceed 50 tons per year, on a pollutant specific basis, the facility owner/operator shall reimburse the District with emission reduction credits for all offsets of that pollutant provided from the Small Facility Banking Account or its predecessor, the Small Facility Bank. [basis: Offsets]

Condition 10946

For S-5
(Applications 13030 & 15645.

1. The total throughput for S-5 shall not exceed 10,130 gallons during any consecutive 12-month period. [basis: cumulative increase]
2. The true vapor pressure of the bulk material stored in S-5 shall not exceed 1.0 psia.
[basis: cumulative increase]
3. To demonstrate compliance with the above conditions, the following records shall be kept on site and made available for District inspection for a period of five years from the date on which a record was made.
 - a. The types of organic liquids stored
 - b. The true vapor pressure of each liquid stored, and;
 - c. The quarterly throughput quantities.
[basis: cumulative increase]

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., weekly (W., 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
S1, NO. 1 COATER;
S2, NO. 2 COATER

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	Y		Abatement device efficiency > 90%	BAAQMD 8-11-504	C	Temperature recorder
	BAAQMD Cond #2370, Part 1	Y		Annual emissions shall be less than 32.9 tons/year	BAAQMD Cond #2370, Part 13	P/D	Records
	BAAQMD Cond #2370, Part 1	Y		Annual emissions shall be less than 32.9 tons/year	BAAQMD Cond #2370, Parts 7-10	C	Temperature monitor and recorder
	BAAQMD Cond #2370, Part 1	Y		Annual emissions shall be less than 32.9 tons/year	BAAQMD Cond #2370, Part 12	P/Q	Intake velocity measurements
VOC	BAAQMD Cond #2370, Part 2			Coating and solvent usage shall be less than 104,720 gallons/year	BAAQMD Cond #2370, Part 13b, 13c, 13g and 13h	P/D	Records
VOC	BAAQMD Cond #2370, Part 3			VOC emissions shall be controlled by 90% on a mass basis overall	BAAQMD Cond #2370, Parts 7-10	C	Temperature monitor and recorder

VII. Applicable Limits and Compliance Monitoring Requirements

Table VII - A
Applicable Limits and Compliance Monitoring Requirements
S1, NO. 1 COATER;
S2, NO. 2 COATER

Type of Limit	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
	BAAQMD Cond #2370, Part 3			VOC emissions shall be controlled by 90% on a mass basis overall	BAAQMD Cond #2370, Part 12	P/Q	Intake velocity measurements
	BAAQMD Cond #2370, Part 5			Destruction efficiency of the afterburner shall be at least 98.5%	BAAQMD Cond #2370, Parts 7-10	C	Temperature monitor and recorder
	BAAQMD Cond #2370, Part 6			Afterburner temperature shall be at least 1450 degrees F.	BAAQMD Cond #2370, Parts 7-10	C	Temperature monitor and recorder
Opacity	BAAQMD 6-301	Y		> Ringelmann No. 1 for no more than 3 minutes in any hour		N	
FP	BAAQMD 6-310	Y		0.15 grain/dscf		N	
SO2	BAAQMD 9-1-301	Y		GLC ¹ of 0.5 ppm for 3 min or 0.25 ppm for 60 min or 0.05 ppm for 24 hours		N	
	BAAQMD 9-1-302	Y		300 ppm (dry)		N	

VII. Applicable Limits and Compliance Monitoring Requirements

Table VII – B
Applicable Limits and Compliance Monitoring Requirements
S2, OVEN FOR #1 COATER;
S4, OVEN FOR #2 COATER

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	Y		Abatement device efficiency > 90%	BAAQMD 8-11-504	C	Temperature recorder
VOC	BAAQMD Cond #2370, Part 1	Y		Annual emissions shall be less than 32.9 tons/year	BAAQMD Cond #2370, Part 9	P/D	Records
	BAAQMD Cond #2370, Part 1	Y		Annual emissions shall be less than 32.9 tons/year	BAAQMD Cond #2370, Parts 6, 7, and 8	C	Temperature monitor and recorder
	BAAQMD Cond #2370, Part 1	Y		Annual emissions shall be less than 32.9 tons/year	BAAQMD Cond #2370, Part 12	P/Q	Intake velocity measurements
	BAAQMD Cond #2370, Part 2			Coating and solvent usage shall be less than 104,720 gallons/year	BAAQMD Cond #2370, Part 9b, 9c, 9g and 9h	P/D	Records
	BAAQMD Cond #2370, Part 3			VOC emissions shall be controlled by 90% on a mass basis overall	BAAQMD Cond #2370, Parts 6, 7, and 8	C	Temperature monitor and recorder
	BAAQMD Cond #2370, Part 3			VOC emissions shall be controlled by 90% on a mass basis overall	BAAQMD Cond #2370, Part 12	P/Q	Intake velocity measurements
	BAAQMD Cond #2370, Part 5			Destruction efficiency of the afterburner shall be at least 98.5%	BAAQMD Cond #2370, Parts 6, 7, and 8	C	Temperature monitor and recorder

VII. Applicable Limits and Compliance Monitoring Requirements

Table VII – B
Applicable Limits and Compliance Monitoring Requirements
S2, OVEN FOR #1 COATER;
S4, OVEN FOR #2 COATER

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 Cond #2370, Part 6			Afterburner temperature shall be at least 1450 degrees F.	BAAQMD Cond #2370, Parts 6, 7, and 8	C	Temperature monitor and recorder
Opacity	BAAQMD 6-301	Y		> Ringelmann No. 1 for no more than 3 minutes in any hour		N	
FP	BAAQMD 6-310	Y		0.15 grain/dscf		N	
SO2	BAAQMD 9-1-301	Y		GLC ¹ of 0.5 ppm for 3 min or 0.25 ppm for 60 min or 0.05 ppm for 24 hours		N	
	BAAQMD 9-1-302	Y		300 ppm (dry)		N	

Table VII – C
Applicable Limits and Compliance Monitoring Requirements
S5, SPENT SOLVENT STORAGE TANK

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 Cond# 10946, part 1	Y		10,130 gal/12 months	BAAQMD Cond# 10946, part 3	P/Q	Records
	BAAQMD Cond# 10946, part 2	Y		Vapor pressure > 1.0 psia	BAAQMD Cond# 10946, part 3	P/Q	Records

VIII. TEST METHODS

The test methods associated with the emission limit of a District regulation are generally referenced in Section 600 et seq. 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, of this permit.

**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 8-11-302	Emission Control Device Limitation	Manual of Procedures, Volume IV, ST-7, "Organic Compounds" <u>or</u> EPA Method 25 "Determination of Total Gaseous Nonmethane Organic Emissions as Carbon" <u>or</u> 25A "Determination of Total Gaseous Organic Concentration Using a Flame Ionization Analyzer"
BAAQMD 9-1-302	General Emission Limitation	Manual of Procedures, Volume IV, ST-19A, Sulfur Dioxide, Continuous Sampling, or ST-19B, Total Sulfur Oxides Integrated Sample
BAAQMD Cond. #2370, part 5	Abatement Control Efficiency	Manual of Procedures, Volume IV, ST-7, "Organic Compounds" <u>or</u> EPA Method 25 "Determination of Total Gaseous Nonmethane Organic Emissions as Carbon" <u>or</u> 25A "Determination of Total Gaseous Organic Concentration Using a Flame Ionization Analyzer"
BAAQMD Cond #10946, part 5	Vapor Pressure	Manual of Procedures, Volume III, Method 28, Determination of Vapor Pressure of Organic Liquids from Storage Tanks.

IX. REVISION HISTORY

Initial Title V Permit Issuance:	February 7, 2001
Administrative Amendment: Change of facility name from Crown Cork & Seal” to “Silgan Containers Mfg. Corp.” Change of Responsible Official and Contact	March 6, 2003
Minor Revision: Change to description of S1 and S2, Coaters Updating of standard language in permit Addition of BAAQMD and SIP Regulation 1-523	January 5, 2004

X. PERMIT SHIELD

Not applicable.

XI. GLOSSARY

ACT

Federal Clean Air Act

BAAQMD

Bay Area Air Quality Management District

BACT

Best Available Control Technology

Basis

The underlying authority that allows the District to impose requirements.

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 pursuant to BAAQMD Rule 2-1-403, Permit Conditions (as amended by the District Board on 7/17/91. and SIP Rule 2-1-403, Permit Conditions (as approved by EPA on 6/23/95. 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.

X. Glossary

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.

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.

Major Facility

A facility with potential emissions of: (1) at least 100 tons per year of any regulated air pollutants, (2) at least 10 tons per year of any single hazardous air pollutant, and/or (3) at least 25 tons per year of any combination of hazardous air pollutants, or such lesser quantity of hazardous air pollutants 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.

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

NO_x

Oxides of nitrogen.

NSPS

X. Glossary

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 pre-construction 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, NO_x, PM₁₀, and SO₂.

Phase II Acid Rain Facility

A facility that generates electricity for sale through fossil-fuel combustion and is not exempted by 40 CFR 72 from 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 or equal to 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 Air Ambient 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.

X. Glossary

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

XII. 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>