San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

MAR 21 2013

Mr. Bob Hall
Ball Metal Food Container Corp.
PO Box 589
Broomfield, CO 80038-0589

Re: Notice of Preliminary Decision - ATC / Certificate of Conformity
Facility # N-2253
Project # N-1123377

Dear Mr. Hall:

Enclosed for your review and comment is the District's analysis of an application for Authorities to Construct for Ball Metal Food Container Corp. at 300 Gregor Street in Oakdale, CA. The applicant is proposing to modify three sheet coating lines with curing ovens, to replace the burners in the curing ovens with smaller low-NOx burners and to remove the District Rule 4309 monitoring requirements.

After addressing all comments made during the 30-day public notice and the 45-day EPA comment periods, the Authorities to Construct will be issued to the facility with Certificates of Conformity. Prior to operating with modifications authorized by the Authorities to Construct, the facility must submit an application to modify the Title V permit as an administrative amendment, in accordance with District Rule 2520, Section 11.5.

The public notice will be published approximately three days from the date of this letter. Please submit your written comments within the 30-day public comment period which begins on the date of publication of the public notice.

If you have any questions, please contact Mr. Rupi Gill, Permit Services Manager, at (209) 557-6400.

Thank you for your cooperation in this matter.

Sincerely,

David Warner
Director of Permit Services

DW:JH/st

Enclosures

Seyed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: 661-392-5500 FAX: 661-392-5585

www.valleyair.org www.healthyairliving.com

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

MAR 21 2013

Gerardo C. Rios, Chief
Permits Office
Air Division
U.S. EPA - Region IX
75 Hawthorne St.
San Francisco, CA 94105

Re: Notice of Preliminary Decision - ATC / Certificate of Conformity
Facility # N-2253
Project # N-1123377

Dear Mr. Rios:

Enclosed for your review is the District's engineering evaluation of an application for Authorities to Construct for Ball Metal Food Container Corp. at 300 Gregor Street in Oakdale, CA, which has been issued a Title V permit. Ball Metal Food Container Corp. is requesting that Certificates of Conformity, with the procedural requirements of 40 CFR Part 70, be issued with this project. The applicant is proposing to modify three sheet coating lines with curing ovens, to replace the burners in the curing ovens with smaller low-NOx burners and to remove the District Rule 4309 monitoring requirements.

Enclosed is the engineering evaluation of this application, along with the current Title V permit, and proposed Authorities to Construct # N-2253-15-3, '-16-3, and '-17-3 with Certificates of Conformity. After demonstrating compliance with the Authority to Construct, the conditions will be incorporated into the facility's Title V permit through an administrative amendment.

Please submit your written comments on this project within the 45-day comment period that begins on the date you receive this letter. If you have any questions, please contact Mr. Rupi Gill, Permit Services Manager, at (209) 557-6400.

Thank you for your cooperation in this matter.

Sincerely,

David Warner
Director of Permit Services

DW:JH/st

Enclosures

Seyed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: 661-392-5500 FAX: 661-392-5585

www.valleyair.org www.healthyairliving.com

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

MAR 2 1 2013

Mike Tollstrup, Chief
Project Assessment Branch
Air Resources Board
P O Box 2815
Sacramento, CA 95812-2815

Re: **Notice of Preliminary Decision - ATC / Certificate of Conformity**
Facility # N-2253
Project # N-1123377

Dear Mr. Tollstrup:

Enclosed for your review and comment is the District's analysis of an application for Authorities to Construct for Ball Metal Food Container Corp. at 300 Gregor Street in Oakdale, CA. The applicant is proposing to modify three sheet coating lines with curing ovens, to replace the burners in the curing ovens with smaller low-NOx burners and to remove the District Rule 4309 monitoring requirements.

The public notice will be published approximately three days from the date of this letter. Please submit your written comments within the 30-day public comment period which begins on the date of publication of the public notice.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Rupi Gill, Permit Services Manager, at (209) 557-6400.

Thank you for your cooperation in this matter.

Sincerely,

David Warner
Director of Permit Services

DW:JH/st

Enclosures

Seyed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: 661-392-5500 FAX: 661-392-5585

www.valleyair.org www.healthyairliving.com

Modesto Bee

**NOTICE OF PRELIMINARY DECISION
FOR THE ISSUANCE OF AUTHORITY TO CONSTRUCT AND
THE PROPOSED SIGNIFICANT MODIFICATION OF FEDERALLY
MANDATED OPERATING PERMIT**

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Air Pollution Control District solicits public comment on the proposed significant modification of Ball Metal Food Container Corp. at 300 Gregor Street in Oakdale, California. The applicant is proposing to modify the three sheet coating lines with curing ovens, to replace the burners in the curing ovens with smaller low-NOx burners and to remove the District Rule 4309 monitoring requirements.

The District's analysis of the legal and factual basis for this proposed action, project #N-1123377, is available for public inspection at http://www.valleyair.org/notices/public_notices_idx.htm and at any District office. There are no emission increases associated with this proposed action. This will be the public's only opportunity to comment on the specific conditions of the modification. If requested, the District will hold a public hearing regarding issuance of this modification. For additional information, please contact the District at (209) 557-6400. Written comments on the proposed initial permit must be submitted by April 25, 2013 to **DAVID WARNER, DIRECTOR OF PERMIT SERVICES, SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT, 4800 ENTERPRISE WAY, MODESTO, CA 95356-0244.**

San Joaquin Valley Air Pollution Control District
Authority to Construct

Modification of Three Curing Ovens to Replace Burners

Facility Name:	Ball Metal Food Container Corp.	Date:	March 6, 2013
Mailing Address:	300 Gregor Street Oakdale, CA 95361-8613	Engineer:	James Harader
		Lead Engineer:	Nick Peirce
Contact Person:	Bob Hall		
Telephone:	(303) 460-5445		
Application #:	N-2253-15-13, '16-13, and '17-13		
Project #:	N-1123377		
Deemed Complete:	February 1, 2013		

I. PROPOSAL

Ball Metal Food Container Corp. (Ball Metal) has requested Authority to Construct applications for the modification of three sheet coating lines, each with a curing oven, to replace the existing burners in each curing oven with new low-NOx burners. The total heat input for each of the curing ovens will be 4.9 MMBtu/hr, or less, following the burner retrofit. As a result, each of the ovens will no longer be subject to District Rule 4309 requirements. Finally, since the ovens will no longer subject to District Rule 4309, the applicant is requesting to remove the District Rule 4309 monitoring requirements from the permits.

Ball Metal currently has a Title V permit. This modification can be classified as a Title V significant modification pursuant to Rule 2520, and can be processed with a Certificate of Conformity (COC). Since the facility has specifically requested that this project be processed in that manner, a 30-day public notice and 45-day EPA comment period will be satisfied prior to the issuance of the Authority to Construct permits. Ball Metal must apply to administratively amend their Title V permit prior to operating under the changes authorized within this project.

II. APPLICABLE RULES

District Rule 2201	New and Modified Stationary Source Review Rule (4/21/05)
District Rule 2410	Prevention of Significant Deterioration (6/16/11)
District Rule 2520	Federally Mandated Operating Permits (6/21/01)
District Rule 4001	New Source Performance Standards (4/14/99)
District Rule 4002	National Emission Standards for Hazardous Air Pollutants (12/15/05)
District Rule 4101	Visible Emissions (2/17/05)
District Rule 4102	Nuisance (12/17/92)
District Rule 4201	Particulate Matter Concentration (12/17/92)
District Rule 4301	Fuel Burning Equipment (12/17/92)
District Rule 4309	Dryers, Dehydrators, and Ovens (12/15/2005)

District Rule 4604	Can and Coil Coating Operations (9/20/07)
District Rule 4801	Sulfur Compounds (12/17/92)
CH&SC 41700	Health Risk Assessment
CH&SC 42301.6	School Notice

Public Resources Code 21000-21177: California Environmental Quality Act (CEQA)
California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387: CEQA Guidelines

III. PROJECT LOCATION

This equipment is located at 300 Gregor St in Oakdale, CA. The District has verified that this equipment will not be located within 1000' of a K-12 school. Therefore, the public notification requirements of California Health and Safety Code 42301.6 are not applicable to this project.

IV. PROCESS DESCRIPTION

The following process description is applicable to each of the sheet coating lines:

Body blanks are used to form the sides of the cans, and are coated to prevent corrosion. Sheets of steel are conveyed into the coating application station where coatings are applied utilizing a roll coating system. Following coating application, the sheets are conveyed through a curing oven and then stacked. The sheet coating and curing oven exhaust into a shared thermal oxidizer (Shared by units N-2253-1, -2, -3, -4, -6, -8, -9, -15, -16, -17, -18, -21 and 22). Units N-2253-16 and N-2253-18 share a curing oven; however, the curing oven heat input and requirements are intentionally only included on permit N-2253-16. This proposal is to replace the burners in each of the curing ovens with new low-NOx burners that have a total heat input of 4.9 MMBtu/hr per oven, or less. Additionally, the facility is requesting to remove the District Rule 4309 monitoring requirements for the ovens.

Each unit may operate up to 24 hr/day, 365 days/year.

V. EQUIPMENT LISTING

Pre-Project Equipment Description

N-2253-15-12: SHEET COATING OPERATION #2 CONSISTING OF A WAGNER MODEL 15X44-A SHEET COATER AND A 7.7 MMBTU/HR YOUNG BROS. KELGRAF OVEN WITH MAXON CYCLOMAX LOW NOX BURNERS. THE COATING APPLICATION EQUIPMENT AND THE OVEN ARE ALL VENTED TO AN 8.0 MMBTU/HR SHARED THERMAL OXIDIZER EQUIPPED WITH A HEAT RECOVERY SYSTEM THAT TRANSFERS THERMAL OXIDIZER EXHAUST INTO THE CURING OVEN

N-2253-16-12: SHEET COATING OPERATION #3 CONSISTING OF A WAGNER MODEL 15X44-A SHEET COATER AND A 9.4 MMBTU/HR YOUNG BROS. KELGRAF OVEN (SHARED WITH N-2253-18) WITH MAXON CYCLOMAX LOW NOX BURNERS. THE COATING APPLICATION EQUIPMENT AND THE OVEN ARE ALL VENTED TO AN 8.0 MMBTU/HR SHARED THERMAL OXIDIZER EQUIPPED WITH A HEAT RECOVERY SYSTEM THAT TRANSFERS THERMAL OXIDIZER EXHAUST INTO THE CURING OVEN

N-2253-17-12: SHEET COATING OPERATION #4 CONSISTING OF A WAGNER MODEL 15X44-A SHEET COATER AND A 7.3 MMBTU/HR YOUNG BROS. KELGRAF OVEN WITH MAXON CYCLOMAX LOW NOX BURNERS. THE COATING APPLICATION EQUIPMENT AND THE OVEN ARE ALL VENTED TO AN 8.0 MMBTU/HR SHARED THERMAL OXIDIZER EQUIPPED WITH A HEAT RECOVERY SYSTEM THAT TRANSFERS THERMAL OXIDIZER EXHAUST INTO THE CURING OVEN

Post-Project Equipment Description

N-2253-15-13: SHEET COATING OPERATION #2 CONSISTING OF A WAGNER MODEL 15X44-A SHEET COATER AND A 4.9 MMBTU/HR YOUNG BROS. KELGRAF OVEN WITH MAXON CYCLOMAX LOW NOX BURNERS (OR EQUIVALENT). THE COATING APPLICATION EQUIPMENT AND THE OVEN ARE ALL VENTED TO AN 8.0 MMBTU/HR SHARED THERMAL OXIDIZER EQUIPPED WITH A HEAT RECOVERY SYSTEM THAT TRANSFERS THERMAL OXIDIZER EXHAUST INTO THE CURING OVEN

N-2253-16-13: SHEET COATING OPERATION #3 CONSISTING OF A WAGNER MODEL 15X44-A SHEET COATER AND A 4.9 MMBTU/HR YOUNG BROS. KELGRAF OVEN (SHARED WITH N-2253-18) WITH MAXON CYCLOMAX LOW NOX BURNERS (OR EQUIVALENT). THE COATING APPLICATION EQUIPMENT AND THE OVEN ARE ALL VENTED TO AN 8.0 MMBTU/HR SHARED THERMAL OXIDIZER EQUIPPED WITH A HEAT RECOVERY SYSTEM THAT TRANSFERS THERMAL OXIDIZER EXHAUST INTO THE CURING OVEN

N-2253-17-13: SHEET COATING OPERATION #4 CONSISTING OF A WAGNER MODEL 15X44-A SHEET COATER AND A 4.9 MMBTU/HR YOUNG BROS. KELGRAF OVEN WITH MAXON CYCLOMAX LOW NOX BURNERS (OR EQUIVALENT). THE COATING APPLICATION EQUIPMENT AND THE OVEN ARE ALL VENTED TO AN 8.0 MMBTU/HR SHARED THERMAL OXIDIZER EQUIPPED WITH A HEAT RECOVERY SYSTEM THAT TRANSFERS THERMAL OXIDIZER EXHAUST INTO THE CURING OVEN

VI. EMISSION CONTROL TECHNOLOGY EVALUATION

Each of the three sheet coating operations is routed to the shared thermal oxidizer for control of VOC emissions. The thermal oxidizer is required to achieve a minimum of 98.5% overall capture and control of VOC emissions from the sheet coating units.

Each of the ovens is currently equipped with low-NOx burners and will be retrofitted with new low-NOx burners.

VII. GENERAL CALCULATIONS

A. Assumptions

- This project will not affect the sheet coating usage rate and the shared thermal oxidizer rating.
- The facility operates a maximum of 365 days/year.
- The sheet coater only emits volatile organic compounds (VOCs).
- This project will not affect the current Specific Limiting Conditions for VOC emissions from the sheet coating lines.
- Natural Gas Heating Value: 1,000 Btu/scf (District Practice).
- F-Factor for Natural Gas: 8,578 dscf/MMBtu corrected to 60°F (40 CFR 60, Appendix B).
- All other assumptions will be stated as they are made.

B. Emission Factors (EF)

1. Pre-Project Emission Factors

Emission Factors for Sheet Coating

The current sheet coating permits each contain daily VOC limitations that the applicant is not proposing to modify. Therefore, an emission factor is not necessary to calculate emissions from the sheet coating operations.

Emission Factors for the Curing Ovens (N-2253-15, '-16, and '-17)

Each of the curing ovens is currently subject to the following emission limits:

Pollutant	Emission Factor (lb/MMBtu)	Emission Factor (ppmvd @ 19% O_2
NOx	0.024	2.1
SOx	0.00285	N/A
PM_{10}	0.0076	N/A
CO	0.15	22
VOC	0.005	N/A

Emission Factors for Shared Thermal Oxidizer

Pollutant	Emission Factor (lb/MMBtu)
NOx	0.098
SOx	0.00285
PM_{10}	0.0076
CO	0.086
VOC	0.005

1. Post-Project Emission Factors

Emission Factors for Sheet Coating

The applicant has not requested a change to the sheet coating emission factors.

Emission Factors for the Curing Ovens (N-2253-15, '-16, and '-17)

The applicant has not requested a change to the oven emission factors.

Emission Factors for Shared Thermal Oxidizer

The applicant has not requested a change to the thermal oxidizer emission factors.

C. Calculations

1. Pre-Project Potential to Emit (PE1)

The following emission rates for each of the units were obtained from the engineering evaluation for District Project N-1110746.

N-2253-15-2

Sheet Coating

PE1 Daily VOC = 36.7 lb/day
PE1 Annual VOC = 13,396 lb/year

Curing Oven

Pollutant	PE1 (lb/day)	PE1 (lb/year)
NOx	4.4	1,606
SOx	0.5	183
PM_{10}	1.4	511
CO	27.7	10,111
VOC	0.9	329

N-2253-16-2

Sheet Coating

PE1 Daily VOC = 36.7 lb/day
PE1 Annual VOC = 13,396 lb/year

Curing Oven

Pollutant	PE1 (lb/day)	PE1 (lb/year)
NOx	5.4	2,008
SOx	0.6	219
PM_{10}	1.7	621
CO	33.8	12,337
VOC	1.1	402

N-2253-17-2

Sheet Coating

PE1 Daily VOC = 36.7 lb/day
PE1 Annual VOC = 13,396 lb/year

Curing Oven

Pollutant	PE1 (lb/day)	PE1 (lb/year)
NOx	4.2	1,533
SOx	0.5	183
PM_{10}	1.3	475
CO	26.2	9,563
VOC	0.9	329

N-2253-15, -16, and -17 Shared Thermal Oxidizer

Pollutant	PE1 (lb/day)	PE1 (lb/year)
NOx	18.8	6,862
SOx	0.5	183
PM_{10}	1.5	548
CO	16.5	6,023
VOC	1.0	365

2. Post-Project Potential to Emit (PE2)

N-2253-15-3

Sheet Coating

The applicant is not requesting any changes to the sheet coating emission factors and throughput. Therefore PE2 is equal to PE1.

PE2 Daily VOC = 36.7 lb/day
PE2 Annual VOC = 13,396 lb/year

Curing Oven

PE2 NOx = 4.9 MMBtu/hr x 24 hr/day x 0.024 lb/MMBtu = 2.8 lb/day
PE2 NOx = 2.8 lb/day x 365 days/year = 1,022 lb/year

PE2 SOx = 4.9 MMBtu/hr x 24 hr/day x 0.00285 lb/MMBtu = 0.3 lb/day
PE2 SOx = 0.3 lb/day x 365 days/year = 110 lb/year

PE2 PM10 = 4.9 MMBtu/hr x 24 hr/day x 0.0076 lb/MMBtu = 0.9 lb/day
PE2 PM10 = 0.9 lb/day x 365 days/year = 329 lb/year

PE2 CO = 4.9 MMBtu/hr x 24 hr/day x 0.15 lb/MMBtu = 17.6 lb/day
PE2 CO = 17.6 lb/day x 365 days/year = 6,424 lb/year

PE2 VOC = 4.9 MMBtu/hr x 24 hr/day x 0.005 lb/MMBtu = 0.6 lb/day
PE2 VOC = 0.6 lb/day x 365 days/year = 219 lb/year

Pollutant	PE2 (lb/day)	PE2 (lb/year)
NOx	2.8	1,022
SOx	0.3	110
PM_{10}	0.9	329
CO	17.6	6,424
VOC	0.6	219

N-2253-16-3

Sheet Coating

The applicant is not requesting any changes to the sheet coating emission factors and throughput. Therefore PE2 is equal to PE1.

PE2 Daily VOC = 36.7 lb/day
PE2 Annual VOC = 13,396 lb/year

Curing Oven

PE2 NOx = 4.9 MMBtu/hr x 24 hr/day x 0.024 lb/MMBtu = 2.8 lb/day
PE2 NOx = 2.8 lb/day x 365 days/year = 1,022 lb/year

PE2 SOx = 4.9 MMBtu/hr x 24 hr/day x 0.00285 lb/MMBtu = 0.3 lb/day
PE2 SOx = 0.3 lb/day x 365 days/year = 110 lb/year

PE2 PM10 = 4.9 MMBtu/hr x 24 hr/day x 0.0076 lb/MMBtu = 0.9 lb/day
PE2 PM10 = 0.9 lb/day x 365 days/year = 329 lb/year

PE2 CO = 4.9 MMBtu/hr x 24 hr/day x 0.15 lb/MMBtu = 17.6 lb/day
PE2 CO = 17.6 lb/day x 365 days/year = 6,424 lb/year

PE2 VOC = 4.9 MMBtu/hr x 24 hr/day x 0.005 lb/MMBtu = 0.6 lb/day
PE2 VOC = 0.6 lb/day x 365 days/year = 219 lb/year

Pollutant	PE2 (lb/day)	PE2 (lb/year)
NOx	2.8	1,022
SOx	0.3	110
PM_{10}	0.9	329
CO	17.6	6,424
VOC	0.6	219

N-2253-17-3

Sheet Coating

The applicant is not requesting any changes to the sheet coating emission factors and throughput. Therefore PE2 is equal to PE1.

PE2 Daily VOC = 36.7 lb/day
PE2 Annual VOC = 13,396 lb/year

Curing Oven

PE2 NOx = 4.9 MMBtu/hr x 24 hr/day x 0.024 lb/MMBtu = 2.8 lb/day
PE2 NOx = 2.8 lb/day x 365 days/year = 1,022 lb/year

PE2 SOx = 4.9 MMBtu/hr x 24 hr/day x 0.00285 lb/MMBtu = 0.3 lb/day
PE2 SOx = 0.3 lb/day x 365 days/year = 110 lb/year

PE2 PM10 = 4.9 MMBtu/hr x 24 hr/day x 0.0076 lb/MMBtu = 0.9 lb/day
PE2 PM10 = 0.9 lb/day x 365 days/year = 329 lb/year

PE2 CO = 4.9 MMBtu/hr x 24 hr/day x 0.15 lb/MMBtu = 17.6 lb/day
PE2 CO = 17.6 lb/day x 365 days/year = 6,424 lb/year

PE2 VOC = 4.9 MMBtu/hr x 24 hr/day x 0.005 lb/MMBtu = 0.6 lb/day
PE2 VOC = 0.6 lb/day x 365 days/year = 219 lb/year

Pollutant	PE2 (lb/day)	PE2 (lb/year)
NOx	2.8	1,022
SOx	0.3	110
PM_{10}	0.9	329
CO	17.6	6,424
VOC	0.6	219

N-2253-15, -16, and -17 Shared Thermal Oxidizer

The applicant is not requesting any changes to the thermal oxidizer. Therefore PE2 is equal to PE1.

Pollutant	PE2 (lb/day)	PE2 (lb/year)
NOx	18.8	6,862
SOx	0.5	183
PM_{10}	1.5	548
CO	16.5	6,023
VOC	1.0	365

3. Pre-Project Stationary Source Potential to Emit (SSPE1)

Pursuant to Section 4.9 of District Rule 2201, the Pre-Project Stationary Source Potential to Emit (SSPE1) is the Potential to Emit (PE) from all units with valid Authorities to Construct (ATC) or Permits to Operate (PTO) at the Stationary Source and the quantity of emission reduction credits (ERC) which have been banked since September 19, 1991 for Actual Emissions Reductions that have occurred at the source, and which have not been used on-site. The following data was obtained from District Projects N-1110746 and N-1120248.

Stationary Source Pre-Project Potential to Emit (lb/year)					
Permit	**NOx**	**SO_X**	**PM_{10}**	**CO**	**VOC**
N-2253-1-7	0	0	97	0	58,579
N-2253-2-7	0	0		0	
N-2253-3-7	0	0		0	
N-2253-4-7	0	0		0	
N-2253-6-7	0	0		0	
N-2253-7-7	0	0		0	
N-2253-8-7	0	0		0	
N-2253-9-7	0	0		0	
N-2253-21-3	0	0		0	
N-2253-22-1	0	0		0	
N-2253-15-12	**1,606**	**183**	**511**	**10,111**	**40,521**
N-2253-16-12	**2,008**	**219**	**621**	**12,337**	
N-2253-17-12	**1,533**	**183**	**475**	**9,563**	
N-2253-18-8	0	0	0	0	
Shared Thermal Oxidizer	**6,862**	**183**	**548**	**6,023**	
N-2253-19-4	0	0	0	0	27
N-2253-20-4	0	0	0	0	30
N-2253-23-0	266	0	13	147	49
SSPE1	**12,275**	**768**	**2,265**	**38,181**	**99,206**

4. Post-Project Stationary Source Potential to Emit (SSPE2)

Pursuant to Section 4.10 of District Rule 2201, the Post-Project Stationary Source Potential to Emit (SSPE2) is the Potential to Emit (PE) from all units with valid Authorities to Construct (ATC) or Permits to Operate (PTO) at the Stationary Source and the quantity of emission reduction credits (ERC) which have been banked since September 19, 1991 for Actual Emissions Reductions that have occurred at the source, and which have not been used on-site.

Stationary Source Post-Project Potential to Emit (lb/year)					
Permit	**NOx**	**SO_X**	**PM_{10}**	**CO**	**VOC**
N-2253-1-7	0	0	97	0	58,579
N-2253-2-7	0	0		0	
N-2253-3-7	0	0		0	
N-2253-4-7	0	0		0	
N-2253-6-7	0	0		0	
N-2253-7-7	0	0		0	
N-2253-8-7	0	0		0	
N-2253-9-7	0	0		0	
N-2253-21-3	0	0		0	
N-2253-22-1	0	0		0	
N-2253-15-13	**1,022**	**110**	**329**	**6,424**	**40,521**
N-2253-16-13	**1,022**	**110**	**329**	**6,424**	
N-2253-17-13	**1,022**	**110**	**329**	**6,424**	
N-2253-18-8	0	0	0	0	
Shared Thermal Oxidizer	**6,862**	**183**	**548**	**6,023**	
N-2253-19-4	0	0	0	0	27
N-2253-20-4	0	0	0	0	30
N-2253-23-0	266	0	13	147	49
SSPE2	**10,194**	**513**	**1,645**	**25,442**	**99,206**

5. Major Source Determination

District Rule 2201 Major Source Determination

A Major Source is a source with an SSPE2 that equals or exceeds any of the following Major Source thresholds. The following table compares the pre-project and post-project facility-wide annual emissions in order to determine if the facility is already an existing Major Source or if the facility is becoming a Major Source as the result of this project. This facility does not contain ERCs which have been banked at the source.

Major Source Determination					
Pollutant	SSPE1 (lb/yr)	SSPE2 (lb/yr)	Major Source Threshold (lb/yr)	Existing Major Source?	Becoming a Major Source?
NO_x	12,275	10,194	20,000	No	No
SO_x	768	513	140,000	No	No
PM_{10}	2,265	1,645	140,000	No	No
CO	38,181	25,442	200,000	No	No
VOC	99,206	99,206	20,000	Yes	No

District Rule 2410 Major Source Determination:

The facility or the equipment evaluated under this project is not listed as one of the categories specified in 40 CFR 52.21 (b)(1)(i). Therefore the following PSD Major Source thresholds are applicable. The pre-project GHG emission calculations are shown in Appendix III.

PSD Major Source Determination (tons/year)							
	NO2	VOC	SO2	CO	PM	PM10	CO2e
Facility PE before Project Increase	6.1	49.6	0.4	19.1	1.1	1.1	19,217
PSD Major Source Thresholds	250	250	250	250	250	250	100,000
PSD Major Source ? (Y/N)	No	No	No	No	No	No	No

As shown above, the facility is not an existing major source for PSD.

6. Baseline Emissions (BE)

The baseline emission (BE) calculations are performed pollutant by pollutant to determine the amount of offsets required, where necessary, when the SSPE1 is greater than the offset threshold.

BE = Pre-project Potential to Emit for:

- Any unit located at a non-Major Source (post-project),
- Any Highly-Utilized Emissions Unit, located at a Major Source,
- Any Fully-Offset Emissions Unit, located at a Major Source, or
- Any Clean Emissions Unit, Located at a Major Source.

otherwise,

BE = Historic Actual Emissions (HAE), calculated pursuant to Section 3.22.

NOx, SOx, PM_{10} and CO Emissions

As shown in Section VII.C.5 above, the facility is not a post-project Major Source for NOx, SOx, PM_{10}, and CO. Therefore, baseline emissions for NOx, SOx, PM_{10}, and CO are equal to the pre-project potential to emit.

VOC Emissions

The sheet coating operation and the curing oven are exhausted into the thermal oxidizer, which achieves a minimum of 98.5% capture and control of VOC emissions. Pursuant to District Rule 2201, Section 3.1.2.1, a unit equipped with an emission control technology with a minimum control efficiency of at least 95% is a clean emission unit. Therefore, the sheet coating operation and curing oven are clean emission units and the baseline emissions for VOC are equal to the pre-project potential to emit.

7. SB288 Modification

Major Modification is defined in 40 CFR Part 51.165 as "*any physical change in or change in the method of operation of a major stationary source that would result in a significant net emissions increase of any pollutant subject to regulation under the Act.*"

An SB288 Major Modification can only be triggered for NOx, SOx, PM_{10} or VOC emissions. This project is not a major modification for NOx, SOx, or PM_{10} since emissions for these pollutants are lower than their respective Major Source thresholds. The SB288 Major Modification threshold for VOC emissions is 50,000 lb-VOC/year. Since the combined potential to emit for the permit units modified in this project is 40,521, less than 50,000 lb/year, an SB288 Major Modification is not be triggered.

8. Federal Major Modification

This facility is only a Major Source for VOC emissions. Thus, a Federal Major Modification can only potentially be triggered for VOC emissions. The Federal Major Modification threshold for VOC emissions is 0 lb-VOC/year.

The formula for calculating the emission increases from each unit is:

Net Emissions Increase (NEI) = PAE – BAE

Where, PAE is the Projected Actual Emissions and BAE is the Baseline Actual Emissions.

In calculating the emission increase, the portion of emissions after the project that the unit could have accommodated before the project (during the same period used to determine BAE) and that are unrelated to the particular project are to be excluded. Thus, the revised formula for determining the NEI is:

NEI = PE2 – (BAE + Unused Baseline Capacity)

For these units, BAE + Unused Baseline Capacity = PE1, since these units could have legally and physically accommodated all of the unused baseline capacity emissions up to the pre-project potential to emit levels. Thus,

NEI = PE2 – PE1

The NEI for each unit is calculated below. Pursuant to the District's Major Modification Policy, NEI calculated to be less than zero are set equal to zero.

The sheet coater and thermal oxidizer will not be modified in this project. Only the curing ovens will be physically modified; therefore, the NEI calculations will be limited to the curing ovens.

N-2253-15 Curing Oven NEI

NEI = PE2 – PE1

NEI = 219 lb-VOC/year – 329 lb-VOC/year
NEI < 0
NEI = 0

N-2253-16 Curing Oven NEI

NEI = PE2 – PE1

NEI = 219 lb-VOC/year – 402 lb-VOC/year
NEI < 0
NEI = 0

N-2253-17 Curing Oven NEI

NEI = PE2 – PE1

NEI = 219 lb-VOC/year – 329 lb-VOC/year
NEI < 0
NEI = 0

Total NEI for Project

As shown above, the modification to the curing ovens will not result in a Net Emission Increase for any of the three curing ovens. Thus, the total NEI for this project is equal to zero and a Federal Major Modification is not triggered.

9. Rule 2410 – Prevention of Significant Deterioration (PSD) Applicability Determination

Rule 2410 applies to pollutants for which the District is in attainment or for unclasssified, pollutants. The pollutants addressed in the PSD applicability determination are listed as follows:

- NO2 (as a primary pollutant)
- SO2 (as a primary pollutant)
- CO
- PM
- PM10
- Greenhouse gases (GHG): CO2, N2O, CH4, HFCs, PFCs, and SF6

The first step of this PSD evaluation consists of determining whether the facility is an existing PSD Major Source or not (See Section VII.C.5 of this document).

Since this is an existing source that is not an existing PSD source, the second step of the PSD evaluation is to determine if the project, by itself, would be a PSD major source.

As a screening tool, the project potential to emit from all new and modified units is compared to the PSD major source threshold, and if total project potential to emit from all new and modified units is below this threshold, no futher analysis will be needed.

The facility and the equipment evaluated under this project is not listed as one of the categories specified in 40 CFR 52.21 (b)(1)(i). Therefore the following PSD Major Source thresholds are applicable. Post-project GHG potential to emit calculations for the modified units are included in Appendix III.

PSD Major Source Determination: Potential to Emit (tons/year)							
	NO2	VOC	SO2	CO	PM	PM10	CO2e
Total PE from New and Modified Units	1.5	20.3	0.2	9.6	0.5	0.5	11,593
PSD Major Source Threshold	250	250	250	250	250	250	100,000
New PSD Major Source?	No	No	No	No	No	No	No

As shown in the table above, the project potential to emit, by itself, does not exceed any of the PSD major source thresholds. Therefore Rule 2410 is not applicable and no further discussion is required.

10. Quarterly Net Emissions Change (QNEC)

The QNEC is calculated solely to establish emissions that are used to complete the District's PAS emissions profile screen. Detailed QNEC calculations are included in Appendix V.

VIII. COMPLIANCE

District Rule 2201 New and Modified Stationary Source Review Rule

A. Best Available Control Technology (BACT)

1. BACT Applicability

BACT requirements are triggered on a pollutant-by-pollutant basis and on an emissions unit-by-emissions unit basis for the following*:

a. Any new emissions unit with a potential to emit exceeding two pounds per day,
b. The relocation from one Stationary Source to another of an existing emissions unit with a potential to emit exceeding two pounds per day,
c. Modifications to an existing emissions unit with a valid Permit to Operate resulting in an AIPE exceeding two pounds per day, and/or
d. Any new or modified emissions unit, in a stationary source project, which results in a SB288 or Federal Major Modification.

*Except for CO emissions from a new or modified emissions unit at a Stationary Source with an SSPE2 of less than 200,000 pounds per year of CO.

The applicant's proposal could qualify as a routine replacement; however, the applicant has yet to determine the cost of the burner replacement; therefore, it is not possible to determine whether the proposed modifications would result in a reconstructed source. Therefore, the routine replacement BACT exemption will not be used for this project.

a. New emissions units with PE exceeding 2.0 lb/day

There are no new emission units proposed in this project.

b. The relocation of a unit from one stationary to another stationary source.

The applicant is not proposing to relocate any emissions units to another stationary source.

c. Modifications to an existing emissions unit with an Adjusted Increase in Potential to Emit (AIPE) exceeding 2.0 pounds per day.

There are modified emission units in this project. The adjusted increase in potential to emit (AIPE) is calculated as follows.

AIPE = PE2 – HAPE

HAPE = PE1 x (EF2 ÷ EF1)

For EF2 > EF1, EF2 ÷ EF1 = 1

Where,

HAPE = Historically Adjusted Potential to Emit (lb/day)
PE2 = Post-Project Potential to Emit
PE1 = Pre-Project Potential to Emit
EF2 = Post-Project Emissions Factor
EF1 = Pre-Project Emissions Factor

SSPE2 for CO is less than 200,000 lb/year. Therefore, BACT cannot be triggered for CO emissions.

N-2253-15-3

Sheet Coating

For the sheet coating operation, EF2 is equal to EF1. Therefore,

AIPE = PE2 – PE1

AIPE Calculations			
Pollutant	**PE2 (lb/day)**	**PE1 (lb/day)**	**AIPE (lb/day)**
VOC	36.7	36.7	0.0

BACT is not triggered for the sheet coating operation.

Curing Oven

For the curing oven, EF2 is equal to EF1. Therefore,

AIPE = PE2 – PE1

AIPE Calculations			
Pollutant	**PE2 (lb/day)**	**PE1 (lb/day)**	**AIPE (lb/day)**
NOx	2.8	4.4	< 0
SOx	0.3	0.5	< 0
PM_{10}	0.9	1.4	< 0
VOC	0.6	0.9	< 0

BACT is not triggered by the modifications to the curing oven.

N-2253-16-3

Sheet Coating

For the sheet coating operation, EF2 is equal to EF1. Therefore,

AIPE = PE2 – PE1

AIPE Calculations			
Pollutant	**PE2 (lb/day)**	**PE1 (lb/day)**	**AIPE (lb/day)**
VOC	36.7	36.7	0.0

BACT is not triggered for the sheet coating operation.

Curing Oven

For the curing oven, EF2 is equal to EF1. Therefore,

AIPE = PE2 – PE1

AIPE Calculations			
Pollutant	**PE2 (lb/day)**	**PE1 (lb/day)**	**AIPE (lb/day)**
NOx	2.8	5.4	< 0
SOx	0.3	0.6	< 0
PM_{10}	0.9	1.7	< 0
VOC	0.6	1.1	< 0

BACT is not triggered by the modifications to the curing oven.

N-2253-17-3

Sheet Coating

For the sheet coating operation, EF2 is equal to EF1. Therefore,

AIPE = PE2 – PE1

AIPE Calculations			
Pollutant	**PE2 (lb/day)**	**PE1 (lb/day)**	**AIPE (lb/day)**
VOC	36.7	36.7	0.0

BACT is not triggered for the sheet coating operation.

Curing Oven

For the curing oven, EF2 is equal to EF1. Therefore,

AIPE = PE2 – PE1

AIPE Calculations			
Pollutant	**PE2 (lb/day)**	**PE1 (lb/day)**	**AIPE (lb/day)**
NOx	2.8	4.2	< 0
SOx	0.3	0.5	< 0
PM_{10}	0.9	1.3	< 0
VOC	0.6	0.9	< 0

BACT is not triggered by the modifications to the curing oven.

d. Any new or modified emissions unit, in a stationary source project, which results in a SB288 or Federal Major Modification.

As shown in section VII.C.7, this project does not result in a SB288 or Federal Major Modification

As shown above, BACT is not triggered by this proposal.

B. Offsets

1. Offset Applicability

Pursuant to Section 4.5.3, offset requirements shall be triggered on a pollutant-by-pollutant basis. Unless exempted pursuant to Section 4.6, offset requirements shall be triggered if the post-project SSPE2 equals or exceeds the following offset threshold levels.

Offsets Applicability			
Pollutant	SSPE2 (lb/yr)	Offset Threshold (lb/yr)	Offsets Triggered?
NO_x	10,194	20,000	No
SO_x	513	54,750	No
PM_{10}	1,645	29,200	No
CO	25,442	200,000	No
VOC	99,206	20,000	Yes

2. Quantity of Offsets Required

Quantity of VOC Offsets Required:

VOC emissions from these units are limited by an SLC in both the pre-project and post-project configurations. The following equation will be utilized to determine the quantity of VOC offsets required for this project.

Quantity of Offsets Required = [$PE2_{SLC}$ – BE_{SLC} + Cargo Carrier Emissions] x Distance Offset Ratio (DOR)

As described earlier in this evaluation, BE for VOC is equal to the pre-project potential to emit (PE1), since the units are clean for VOC emissions. Additionally, there is no cargo carrier emissions associated with the unit in this project. Thus, the equation can be reduced to:

Quantity of Offsets Required = ($PE2_{SLC}$ – $PE1_{SLC}$) x DOR
Quantity of Offsets Required = 40,521 lb-VOC/year – 40,521 lb-VOC/year
Quantity of Offsets Required = 0 lb-VOC/year

As shown above, the quantity of offsets required is zero; thus, offsets are not required for this project.

C. Public Notification

1. Applicability

Public noticing for District Rule 2201 is required for:

a. Any new Major Source, which is a new facility that is also a Major Source,
b. Major Modifications,
c. Any new emissions unit with a Potential to Emit greater than 100 pounds during any one day for any one pollutant,
d. Any project which results in the offset thresholds being surpassed, and/or
e. Any project with an SSIPE of greater than 20,000 lb/year for any pollutant.

a. New Major Source

As demonstrated in section VII.C.5 above, the facility is not becoming a new Major Source as a result of this project.

b. SB288 or Federal Major Modification

As demonstrated in VII.C.7 and VII.C.8, this project does not constitute a SB288 or Federal Major Modification; therefore, public noticing for SB288 or Federal Major Modification purposes is not required.

c. PE > 100 lb/day

Applications which include a new emissions unit with a PE greater than 100 pounds during any one day for any pollutant will trigger public noticing requirements. There are no new emissions units associated with this project that will have a PE greater than 100 pounds during any one day for any pollutants; therefore public noticing is not required for this project for Potential to Emit exceeding the 100 lb/day limit.

d. Offset Threshold

The following table compares the SSPE1 with the SSPE2 in order to determine if any offset thresholds have been surpassed with this project.

Offset Threshold				
Pollutant	**SSPE1 (lb/year)**	**SSPE2 (lb/year)**	**Offset Threshold**	**Offset Threshold Surpassed?**
NO_X	12,275	10,194	20,000 lb/year	No
SO_X	768	513	54,750 lb/year	No
PM_{10}	2,265	1,645	29,200 lb/year	No
CO	38,181	25,442	200,000 lb/year	No
VOC	99,206	99,206	20,000 lb/year	No

While VOC emissions are greater than the threshold, this project will not result in an increase in VOC emissions. As shown above, an offset threshold will not be surpassed.

e. SSIPE > 20,000 lb/year

Public notification is required for any permitting action that results in a Stationary Source Increase in Permitted Emissions (SSIPE) of more than 20,000 lb/year of any affected pollutant. According to District policy, the SSIPE is calculated as the Post Project Stationary Source Potential to Emit (SSPE2) minus the Pre-Project Stationary Source Potential to Emit (SSPE1), i.e. SSIPE = SSPE2 – SSPE1. The values for SSPE2 and SSPE1 are calculated according to Rule 2201, Sections 4.9 and 4.10, respectively. The SSIPE is compared to the SSIPE Public Notice thresholds in the following table:

Stationary Source Increase In Permitted Emissions [SSIPE] – Public Notice					
Pollutant	**SSPE2 (lb/year)**	**SSPE1 (lb/year)**	**SSIPE (lb/year)**	**SSIPE Public Notice Threshold**	**Public Notice Required?**
NO_x	10,194	12,275	< 0	20,000 lb/year	No
SO_x	513	768	< 0	20,000 lb/year	No
PM_{10}	1,645	2,265	< 0	20,000 lb/year	No
CO	25,442	38,181	< 0	20,000 lb/year	No
VOC	99,206	99,206	0	20,000 lb/year	No

As demonstrated in the table above, a public notice is not required for SSIPE greater than 20,000 lb/year.

2. Public Notice Action

As discussed above, public notice will not be required to satisfy District Rule 2201 requirements.

D. Daily Emission Limits (DELs)

Daily Emissions Limitations (DELs) and other enforceable conditions are required by Section 3.16 to restrict a unit's maximum daily emissions, to a level at or below the emissions associated with the maximum design capacity. Per Sections 3.16.1 and 3.16.2, the DEL must be contained in the latest ATC and contained in or enforced by the latest PTO and enforceable, in a practicable manner, on a daily basis. DELs are also required to enforce the applicability of BACT.

The following conditions will be included on each of the permits:

- *The VOC emissions due to coating and solvent use shall not exceed 36.7 pounds during any one day. [District NSR Rule and 40 CFR Part 64]*

- *The VOC contaminated air stream from the coating application operation and the curing oven shall be vented to the thermal oxidizer prior to discharge into the atmosphere at all times. [District NSR Rule and Rule 4604]*

- *The thermal oxidizer shall be maintained at a minimum temperature of 1490 Degrees F to provide at least 98.5% VOC capture and control and the VOC emission control system shall reduce VOC emissions, at all times, to a level which would have been achieved through the use of materials compliant with the applicable requirements of Rule 4604, Sections 5.1 and 5.4 (9/20/07). [District NSR Rule, District Rules 2520, 9.3.2 and 4604, and 40 CFR Part 64]*

- *Emissions from combustion in the curing oven shall not exceed any of the following limits: 0.024 lb-NOx/MMBtu (equivalent to 2.1 ppmvd NOx @ 19% O_2), 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM_{10}/MMBtu, 0.15 lb-CO/MMBtu (equivalent to 22 ppmvd CO @ 19% O_2), or 0.005 lb-VOC/MMBtu. [District Rule 2201]*

- *Emissions from the shared thermal oxidizer, due to the combustion of natural gas, shall not exceed any of the following limits: 0.098 lb-NOx/MMBtu, 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 0.086 lb-CO/MMBtu, and 0.005 lb-VOC/MMBtu. [District Rule 2201]*

- *The combined VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18, shall not exceed 10,366 pounds during the first calendar quarter, 9,941 pounds during the second calendar quarter, 10,187 pounds during the third calendar quarter and 10,027 pounds during the fourth calendar quarter. The first and fourth calendar quarter VOC emissions may be increased by the amount of second and third calendar quarter VOC's not emitted. [District Rule 2201]*

- *The combined VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18, shall not exceed 40,521 pounds during any consecutive 12-month period. [District Rule 2201]*

E. Compliance Assurance

1. Source Testing

Sheet Coating and Shared Thermal Oxidizer

The following testing conditions from the existing permits will not be affected by the proposed modifications.

- *VOC content of coating(s), as applied, and of solvents shall be determined by United States Environmental Protection Agency (EPA) Test Method 24 or 24A, or South Coast Air Quality Management District (SCAQMD) Method 3' (Determination of Volatile Organic Compounds in Various Materials) c annual basis, or by using the manufacturer's product formulation data formula for "Grams of VOC per liter of Material" as allowed in District ' Section 3.0 (9/20/07). If the coating/solvent manufacturers provi' that the previously mentioned methods are used to determine t' copies of the coating/solvent product data sheets and the ce. maintained, used to calculate the VOC content of the coating,*

shall be considered compliance with this condition. [District Rules 2520, 9.3.2 and 4604]

- *The content of exempt halogenated VOCs shall be determined by using the California Air Resources Board (ARB) Test Method 432 or SCAQMD Test Method 303 (Determination of Exempt Compounds) on an annual basis, or by using the manufacturer's product formulation data and the formula for "Grams of VOC per liter of Material" as allowed in District Rule 4604, Section 3.0 (9/20/07). If the coating/solvent manufacturers provide certification that the previously mentioned methods are used to determine the VOC content, copies of the coating/solvent product data sheets and the certifications may be maintained, used to calculate the VOC content of the coating, as applied, and shall be considered compliance with this condition. [District Rules 2520, 9.3.2 and 4604]*

- *The operator shall source test the thermal oxidizer at least once every twelve months to demonstrate compliance with the VOC control efficiency requirements. [District Rules 1081, 2520, 9.3.2, and 4604, and 40 CFR Part 64]*

- *The control efficiency of VOC emission control device(s) shall be determined using EPA Methods 2, 2A, or 2D for measuring flow rates and EPA Methods 25, 25A, or 25B for measuring total gaseous organic concentrations at the inlet and outlet of the control device. EPA Method 18 or ARB Method 422 shall be used to determine the emissions of exempt compounds. [District Rule 4604]*

- *Source testing of the control efficiency of VOC emission control device shall be performed under conditions representative of normal operating conditions using non-compliant coating and under conditions specified in the Permit-To-Operate. [District Rule 4604]*

- *Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rules 1081 and 2520, 9.3.2]*

- *The results of each source test shall be submitted to the District within 60 days thereafter. [District Rules 1081 and 2520, 9.3.2]*

Curing Ovens

Each of the current permits currently require source testing to measure the NOx and CO emissions at least once every 24 months to satisfy District Rule 2201 and Rule 4309 requirements. While the units will no longer be subject to District Rule 4309 requirements, testing for NOx and CO will continue to be required to ensure that the burners and ovens are maintained properly. The following conditions will be included on each of the Authority to Construct permits:

- *Source testing to measure NOx and CO emissions from the curing oven exhaust shall be conducted at least once every 24 months. [District Rule 2201]*

- *NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis. [District Rule 2201]*

- *CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rule 2201]*

- *Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 2201]*

- *All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4309. [District Rule 2201]*

- *All test results for NOx and CO shall be reported in ppmv @ 19% O2, corrected to dry stack conditions. [District Rule 2201]*

- *For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rule 2201]*

2. Monitoring

Sheet Coating and Shared Thermal Oxidizer

The following monitoring conditions from the existing permits will not be affected by the proposed modifications.

- *The thermal oxidizer shall be equipped with an operational continuous temperature monitoring and recording device. [District NSR Rule, Rules 2520, 9.3.2, and 4604, and 40 CFR Part 64]*

Curing Ovens

The curing ovens will no longer be subject to District Rule 4309 requirements. The District does not typically require monitoring for ovens that are not subject to District Rule 4309. Therefore, no oven monitoring requirements will be included on the Authority to Construct permits

3. Recordkeeping

Sheet Coating and Shared Thermal Oxidizer

The following recordkeeping conditions will be included on each Authority to Construct permit:

- *A list of the coatings, catalysts and reducers used, the mix ratio of the components used, the VOC content of each coating used (as applied) and of the VOC content of each solvent used for clean-up and surface preparation shall be kept. The list shall be made available to the District upon request. [District Rules 2520, 9.3.2 and 4604]*

- *Daily records of the following shall be kept: (a) The specific coatings used and the mix ratio of the components added to the coatings prior to application; (b) The volume of each coating used in gallons; (c) The specific solvent used for clean-up and surface preparation; (d) The volume of each solvent used; (e) The VOC emissions due to coating and solvent usage from this permit unit; (f). The operating temperature of the thermal oxidizer. [District Rules 1070, 2520, 9.3.2 and 4604, and 40 CFR Part 64]*

- *Records of the combined quarterly VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18 (including the VOC's due to combustion), shall be kept. The records shall be updated at least weekly. [District Rules 1070 and 2520, 9.3.2]*

- *Records of the combined rolling 12-month VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18 (including the VOC's due to combustion), shall be kept. The records shall be updated at least monthly. [District Rule 2201]*

- *All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 2201 and 4604]*

Curing Ovens

No recordkeeping requirements are required for the curing ovens.

4. Reporting

No reporting is required to demonstrate compliance with Rule 2201.

District Rule 2520 Federally Mandated Operating Permits

This facility is subject to this Rule, and has received their Title V Operating Permit. A significant permit modification is defined as a "permit amendment that does not qualify as a minor permit modification or administrative amendment." Minor permit modifications do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions. The applicant has requested to remove the District Rule 4309 alternate monitoring requirements for the curing ovens since the ovens are no longer subject to District Rule 4309 requirements. As a result, the proposed project constitutes a Significant Modification to the Title V Permit.

The facility has applied for a Certificate of Conformity (COC); therefore, the facility must apply to modify their Title V permit with an administrative amendment, prior to operating with the proposed modifications. The facility shall not implement the changes requested until the final permit is issued. Additionally, a 30-day public notice must be performed for District Rule 2520 purposes prior to the issuance of the Authority to Construct permits. Continued compliance with this rule is expected.

District Rule 4001 New Source Performance Standards

40 CFR 60 Subpart TT does not apply to this equipment because the items coated are not in coil form at the time they are coated. 40 CFR 60 Part WW does not apply because beverage cans are not coated. No other NSPS standards apply to this operation.

District Rule 4002 National Emission Standards for Hazardous Air Pollutants

The requirements of the Code of Federal Regulations, Chapter 40 (40 CFR), Part 63, Subpart KKKK (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Cans) are applicable to facilities that use 1,500 gallons per year, or more, of coatings in the source category defined in section 63.3481 (a) of this regulation and that is a Major HAP source (as defined in 40 CFR 63.2 – Definitions). Ball Metal Food Container Corp's facility-wide permit limits the facility's HAP emissions to be below Major HAP Source thresholds. Therefore, the requirements of this regulation are not applicable. No other NESHAPS standards apply to this operation.

District Rule 4101 Visible Emissions

District Rule 4101, Section 5.0, indicates that no air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour, which is dark or darker than Ringelmann 1 or equivalent to 20% opacity.

The following condition will be included on each Authority to Construct permit:

- *No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (2/17/05). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101]*

District Rule 4102 Nuisance

Section 4.0 prohibits discharge of air contaminants, which could cause injury, detriment, nuisance or annoyance to the public. Public nuisance conditions are not expected as a result of this operation provided the equipment is well maintained. Therefore, compliance with this rule is expected.

The following condition will be included on each Authority to Construct permit:

- *No air contaminant shall be released into the atmosphere, which causes a public nuisance. [District Rule 4102]*

California Health & Safety Code 41700 (Health Risk Assessment)

District Policy APR 1905 - Risk Management Policy for Permitting New and Modified Sources specifies that for an increase in emissions associated with a proposed new source or modification, the District perform an analysis to determine the possible impact to the nearest resident or worksite.

This proposal will result in a reduction in the heat input rating for each curing oven, and no changes to the stack parameters. Since fuel usage and emissions are not increasing, a risk management review is not required. Additionally, an ambient air quality modeling analysis is not required since no parameters will change.

District Rule 4201 Particulate Matter Concentration

Section 3.1 prohibits discharge of dust, fumes, or total particulate matter into the atmosphere from any single source operation in excess of 0.1 grain per dry standard cubic foot.

The following analysis applies each the natural gas-fired curing oven.

F-Factor for NG: 8,578 dscf/MMBtu at 60 °F
PM_{10} Emission Factor: 0.0076 lb-PM_{10}/MMBtu
Percentage of PM as PM_{10} in Exhaust: 100%

$$GL = \left(\frac{0.0076\ lb - PM}{MMBtu} \times \frac{7{,}000\ grain}{lb - PM} \right) / \left(\frac{8{,}578\ ft^3}{MMBtu} \right)$$

$GL = 0.01\ grain/dscf < 0.1\ grain/dscf$

Therefore, compliance with District Rule 4201 requirements is expected. The following condition will be included on each Authority to Construct permit.

- *Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]*

District Rule 4301 Fuel Burning Equipment

This rule specifies maximum emission rates in lb/hr for SO_2, NO_2, and combustion contaminants (defined as total PM in Rule 1020). This rule also limits combustion contaminants to ≤ 0.1 gr/scf. According to AP 42 (Table 1.4-2, footnote c), all PM emissions from natural gas combustion are less than 1 μm in diameter. This rule does not apply to direct fired units. Each curing oven is direct-fired; therefore, the ovens are not subject to the requirements of this rule.

District Rule 4309 Dryers, Dehydrators, and Ovens

The purpose of this rule is to limit emissions of oxides of nitrogen (NOx) and carbon monoxide (CO) from dryers, dehydrators, and ovens. This rule applies to any dryer, dehydrator, or oven that is fired on gaseous fuel, liquid fuel, or is fired on gaseous and liquid fuel sequentially, and the total rated heat input for the unit is 5.0 million British thermal units per hour (5.0 MMBtu/hr) or greater. The total heat input for each of the curing ovens is less than 5.0 MMBtu/hr; therefore, District Rule 4309 requirements are not applicable.

District Rule 4604 Can and Coil Coating Operation

Each of the three sheet coating operations is subject to the requirements of this Rule.

Section 5.1, Requirements

This section limits the sheet coatings utilized for coating two-piece and three-piece cans; however, Section 5.2 of this Rule allows the use of coatings with higher VOC contents at facilities that utilize a control device that meets the parameters in Rule 4604. These operations are served by a thermal oxidizer that will meet the requirements of Section 5.2; therefore, the VOC limitations of Section 5.1 are not applicable.

Section 5.2, Approved VOC Emission Control System

Section 5.2.1 allows the use of coatings with VOC contents in excess of those listed in Section 5.1, provided the emissions of VOC are controlled by an APCO-approved VOC emission control system that complies with the following:

1. The VOC emission control system must have an overall capture and control efficiency of at least 90 percent by weight.

The shared thermal oxidizer has an overall VOC capture and control efficiency limit of 98.5 percent by weight for the sheet coating operations. Therefore, the control system complies with this requirement. The following condition will continue to be included on each permit:

- *The thermal oxidizer shall be maintained at a minimum temperature of 1490 Degrees F to provide at least 98.5% VOC capture and control and the VOC emission control system shall reduce VOC emissions, at all times, to a level which would have been achieved through the use of materials compliant with the applicable requirements of Rule 4604, Sections 5.1 and 5.4 (9/20/07). [District NSR Rule, District Rules 2520, 9.3.2 and 4604, and 40 CFR Part 64]*

2. The VOC emission control system must reduce VOC emissions, at all times, to a level that is not greater than the emissions level which would have been achieved through the use of materials compliant with Section 5.1 and 5.4.

The following condition will be included on each Authority to Construct permit:

- *The thermal oxidizer shall be maintained at a minimum temperature of 1490 Degrees F to provide at least 98.5% VOC capture and control and the VOC emission control system shall reduce VOC emissions, at all times, to a level which would have been achieved through the use of materials compliant with the applicable requirements of Rule 4604, Sections 5.1 and 5.4 (9/20/07). [District NSR Rule, District Rules 2520, 9.3.2 and 4604, and 40 CFR Part 64]*

3. The VOC control system must comply with #1 and #2 during periods of emission-producing activities.

The following condition will ensure the thermal oxidizer is utilized during all emission-producing activities:

- *The VOC contaminated air stream from the coating application operation and the curing oven shall be vented to the thermal oxidizer prior to discharge into the atmosphere at all times. [District NSR Rule and Rule 4604]*

4. The emission control system used to comply with the provisions of this rule must be under District permit.

The emission control system is under District permit.

5. An operator using a VOC emission control system to comply with the provisions of this rule must monitor key operating system parameters.

The operator of the VOC emission control system is monitoring the temperature of the thermal oxidizer chamber, satisfying this requirement.

6. An operator using a VOC emission control system to comply with the provisions of this Rule must implement an Operation and Maintenance plan pursuant to Section 6.5 within 10 days of APCO approval of the plan.

The following condition will be included on each Authority to Construct permit:

- *The owner or operator shall submit a VOC Emission Control System Operation and Maintenance Plan in accordance with the provisions outlined in Section 6.5 of District Rule 4604. [District Rule 4604]*

7. Source Testing Requirements for VOC Emission Collection Devices and VOC Emission Control Devices

A. Source Testing Requirements for VOC Emission Collection Devices that are Permanent Total Enclosures (PTE's)

100% of the exhaust from the sheet coating and curing oven line is routed to the thermal oxidizer. Therefore, the capture systems for these sheet coating lines are considered to be permanent total enclosures. Section 5.2.8.1 requires that an operator source test or certify that the PTE complies with the requirements of a PTE.

Pursuant to information in the project file for District Project N-1042586, the capture system for each sheet coater was certified as a permanent total enclosure. Pursuant to Section 5.2.8.1, a VOC emission collection devised that has already been certified as compliant with the requirements of a PTE as of February 1, 2004 does not need to be retested or recertified to comply with the requirements of Rule 4604. Thus, no capture efficiency testing conditions are required.

B. Source Testing of VOC Emission Control Devices

Section 5.2.8.3.1 requires an operator to source test the VOC emission control device at least once every 12 months to determine the control efficiency of the VOC emission control device.

Sections 5.2.8.3.2 and 5.2.8.3.3 state that the source test for a VOC emission control device shall be conducted under normal operating conditions.

The following conditions will be included on each Authority to Construct permit:

- *The operator shall source test the thermal oxidizer at least once every twelve months to demonstrate compliance with the VOC control efficiency requirements. [District Rules 1081, 2520, 9.3.2, and 4604, and 40 CFR Part 64]*

- *Source testing of the control efficiency of VOC emission control device shall be performed under conditions representative of normal operating conditions using non-compliant coating and under conditions specified in the Permit-To-Operate. [District Rule 4604]*

Section 5.4, Organic Solvent Cleaning Requirements

Section 5.4.1 states that an operator must not use organic solvents for cleaning operations that exceed the VOC contents listed below:

Type of Solvent Cleaning Operation	VOC Content Limit (grams of VOC/liter of material)
Product Cleaning During Manufacturing Process or Surface Preparation for Coating Application	25
Repair and Maintenance Cleaning	25
Cleaning and Coating Application Equipment (all except sheet coater for three-piece cans)	25
Cleaning and Coating Application equipment (sheet coater for three-piece cans)	550 g/l (until 9/30/2011) 250 g/l (after 10/1/2011)

Section 5.4.4 states that cleaning activities that use solvents must be performed by one or more of the following methods:

1. Wipe cleaning,
2. Application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force,
3. Non-atomized solvent flow method in which the cleaning solvent is collected in a container or a collection system which is closed except for solvent collection openings and, if necessary, openings to avoid pressure build-up inside the container, or
4. Solvent flushing method in which the cleaning solvent is discharged into a container that is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container.

Section 5.4.5 states that solvent must not be atomized into the open air unless it is vented to a VOC emission control system that complies with Section 5.2. this provision is not applicable to the cleaning nozzle tips of automated spray equipment systems, except for robotic systems, and cleaning with spray bottles or containers described in Section 5.4.4.2 of Rule 4604.

Section 5.4.6 states that an operator must not use VOC containing materials to clean spray equipment used for the application of coatings unless an enclosed system, or equivalent, is used.

The following conditions will continue to be included on each permit:

- *All solvent cleaning activities shall be performed using solvents with VOC contents not exceeding 25 g/l (0.21 lb/gal) unless such cleaning operations are performed within the control of an APCO-approved emission control system that meets the requirements of District Rule 4604 (9/20/07). [District Rule 4604]*

- *Solvent shall not be atomized into the open air. This provision shall not apply to the cleaning of nozzle tips of automated spray equipment systems, except for robotic systems, and cleaning with spray bottles or containers described in section 5.4.4.2 of Rule 4604 (9/20/07). [District Rule 4604]*

- *Permittee shall not use VOC-containing materials to clean spray equipment used for the application of coatings unless an enclosed system or equipment proven to be equally effective in controlling emissions is used for cleaning. [District Rule 4604]*

Section 5.5, Organic Solvent Storage and Disposal

Section 5.5 states that an operator shall store or dispose of fresh or spent solvents, waste solvent cleaning materials, coatings, adhesives, catalysts, and thinners in closed, non-absorbent and non-leaking containers. The containers must remain closed at all times, except when depositing or removing the contents of the containers or when the container is empty. The following condition will be included on each permit:

- *An operator shall store or dispose of fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc.; coatings; adhesives; catalysts; and thinners in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4604]*

Section 5.6, Application Equipment

Section 5.6.1 states that an operator must not apply any coating unless:

1. The coating is applied with properly operating coating application equipment, and
2. the coating application equipment is operated according to the procedures specified by the equipment manufacturer, and
3. The coating application equipment complies with the requirements of Section 5.6.2.

Section 5.6.2 states that an operator must not apply any coating except by use of one or more of the following methods:

1. Electrostatic Application
2. Flow Coater
3. Roll Coater
4. Dip Coater
5. Hand Application Methods
6. HVLP Spray

The following condition will be included on each Authority to Construct permit:

- *An operator shall not apply any coating except by the use of one or more of the following methods is utilized: flow, roll, dip, or hand application. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rules 2201 and 4604]*

Section 6.0, Administrative Requirements

Section 6.1 states that the operator of a can or coil operation subject to any part of Section 5.0 or performs solvent cleaning operations associated with Section 5.4, must comply with the recordkeeping requirements of Section 6.2 through 6.5.

Section 6.2.1 requires the facility to keep a coating materials list. The following condition will be included on each Authority to Construct permit:

- *A list of the coatings, catalysts and reducers used, the mix ratio of the components used, the VOC content of each coating used (as applied) and of the VOC content of each solvent used for clean-up and surface preparation shall be kept. The list shall be made available to the District upon request. [District Rules 2520, 9.3.2 and 4604]*

Section 6.2.2 requires the operator to keep coating usage records on a daily basis, and Section 6.2.3 requires those records be kept on a daily basis. The following condition will be included on each permit:

- *Daily records of the following shall be kept: (a) The specific coatings used and the mix ratio of the components added to the coatings prior to application; (b) The volume of each coating used in gallons; (c) The specific solvent used for clean-up and surface preparation; (d) The volume of each solvent used; (e) The VOC emissions due to coating and solvent usage from this permit unit; (f). The operating temperature of the thermal oxidizer. [District Rules 1070, 2520, 9.3.2 and 4604 and 40 CFR Part 64]*

Section 6.2.5 requires the coating materials list and coating usage records to be maintained for a minimum of five years and be made available upon request. The following condition will be included on each Authority to Construct permit:

- *All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 2201 and 4604]*

Section 6.3 Cleaning Solvent Records

Section 6.3.1 requires the facility to keep a solvents materials list. The following condition will be included on each Authority to Construct permit:

- *A list of the coatings, catalysts and reducers used, the mix ratio of the components used, the VOC content of each coating used (as applied) and of the VOC content of each solvent used for clean-up and surface preparation shall be kept. The list shall be made available to the District upon request. [District Rules 2520, 9.3.2 and 4604]*

Section 6.3.2 requires the operator to keep coating usage records on a daily basis, and Section 6.3.3 requires those records be kept on a daily basis. The following condition will be included on each Authority to Construct permit:

- *Daily records of the following shall be kept: (a) The specific coatings used and the mix ratio of the components added to the coatings prior to application; (b) The volume of each coating used in gallons; (c) The specific solvent used for clean-up and surface preparation; (d) The volume of each solvent used; (e) The VOC emissions due to coating and solvent usage from this permit unit; (f). The operating temperature of the thermal oxidizer. [District Rules 1070, 2520, 9.3.2 and 4604 and 40 CFR Part 64]*

Section 6.3.5 requires the coating materials list and coating usage records to be maintained for a minimum of five years and be made available upon request. The following condition will be included on each Authority to Construct permit:

- *All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 2201 and 4604]*

Section 6.4 VOC Emission Control System Records

Section 6.4.1 requires an operator using a VOC emission control system pursuant to Section 5.2 as a means of complying with this rule keep a daily record of the key operating system parameters that will demonstrate continuous operation and compliance of the VOC emission control system during periods of emission-producing activities. The operator monitors the temperature of the thermal oxidizer chamber to comply with this requirement. The following conditions will be included on each Authority to Construct permit:

- *The thermal oxidizer shall be maintained at a minimum temperature of 1490 Degrees F to provide at least 98.5% VOC capture and control and the VOC emission control system shall reduce VOC emissions, at all times, to a level which would have been achieved through the use of materials compliant with the applicable requirements of Rule 4604, Sections 5.1 and 5.4 (9/20/07). [District NSR Rule, District Rules 2520, 9.3.2 and 4604, and 40 CFR Part 64]*

- *The thermal oxidizer shall be equipped with an operational continuous temperature monitoring and recording device. [District NSR Rule, Rules 2520, 9.3.2, and 4604, and 40 CFR Part 64]*

Section 6.4.2 states that any record showing a violation of Section 5.2 must be reported by sending a copy of such record to the APCO within 96 hours following the occurrence. The report must include an explanation of the cause of the violation and the corrective action taken. The following condition will be included on each Authority to Construct permit:

- *An excursion is deemed to occur when the afterburner temperature drops below the minimum operating temperature of 1490 Degrees F. Upon detecting any excursion, the permittee shall investigate the excursion and take corrective action to minimize emissions and prevent recurrence of the excursion as expeditiously as practicable. Any record of an excursion shall be reported by sending a copy of such record to the APCO within 96 hours following the occurrence. Such report shall include an explanation of the cause of the excursion and the corrective action taken. [District Rule 4604]*

Section 6.4.3 requires the operator to retain VOC emission control system records for five years. The following condition will be included on each Authority to Construct permit:

- *All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 2201 and 4604]*

Section 6.5 VOC Emission Control System Operation and Maintenance Plan

Section 6.5 requires the facility to submit a VOC Emission Control System Operation and Maintenance Plan. The following condition will be included on each Authority to Construct permit:

- *The owner or operator shall submit a VOC Emission Control System Operation and Maintenance Plan in accordance with the provisions outlined in Section 6.5 of District Rule 4604. [District Rule 4604]*

Section 6.7 Test Methods

Section 6.7.1.1 states that the VOC content of solvents and organic materials must be determined using EPA Method 24 or 24A, SCAQMD Method 304 , or by using the manufacturer's product formulation data and the formula for "Grams of VOC per liter of Material in Section 3.0.

Section 6.7.1.2 states that the content of exempt halogenated VOCs must be determined using ARB Method 432 or SCAQMD Method 303.

The following conditions will be included on each Authority to Construct permit.

- *VOC content of coating(s), as applied, and of solvents shall be determined by United States Environmental Protection Agency (EPA) Test Method 24 or 24A, or South Coast Air Quality Management District (SCAQMD) Method 304 (Determination of Volatile Organic Compounds in Various Materials) on an annual basis, or by using the manufacturer's product formulation data and the formula for "Grams of VOC per liter of Material" as allowed in District Rule 4604, Section 3.0 (9/20/07). If the coating/solvent manufacturers provide certification that the previously mentioned methods are used to determine the VOC content, copies of the coating/solvent product data sheets and the certifications may be maintained, used to calculate the VOC content of the coating, as applied, and shall be considered compliance with this condition. [District Rules 2520, 9.3.2 and 4604]*

- *The content of exempt halogenated VOCs shall be determined by using the California Air Resources Board (ARB) Test Method 432 or SCAQMD Test Method 303 (Determination of Exempt Compounds) on an annual basis, or by using the manufacturer's product formulation data and the formula for "Grams of VOC per liter of Material" as allowed in District Rule 4604, Section 3.0 (9/20/07). If the coating/solvent manufacturers provide certification that the previously mentioned methods are used to determine the VOC content, copies of the coating/solvent product data sheets and the certifications may be maintained, used to calculate the VOC content of the coating, as applied, and shall be considered compliance with this condition. [District Rules 2520, 9.3.2 and 4604]*

Section 6.7.2 lists the requirements for the determination of control efficiency for VOC Emission Control Devices. The following condition will be included on each Authority to Construct permit:

- *The control efficiency of VOC emission control device(s) shall be determined using EPA Methods 2, 2A, or 2D for measuring flow rates and EPA Methods 25, 25A, or 25B for measuring total gaseous organic concentrations at the inlet and outlet of the control device. EPA Method 18 or ARB Method 422 shall be used to determine the emissions of exempt compounds. [District Rule 4604]*

District Rule 4801 Sulfur Compounds

A person shall not discharge into the atmosphere sulfur compounds, which would exist as a liquid or gas at standard conditions, exceeding in concentration at the point of discharge: 0.2 % by volume calculated as SO_2, on a dry basis averaged over 15 consecutive minutes.

Using the ideal gas equation and the emission factors presented in Section VII, the sulfur compound emissions are calculated as follows:

Volume $SO_2 = \frac{n\,RT}{P}$

With:

N = moles SO_2
T (Standard Temperature) = 60°F = 520°R
P (Standard Pressure) = 14.7 psi
R (Universal Gas Constant) = $\frac{10.73\,psi \cdot ft^3}{lb \cdot mol \cdot °R}$

Natural Gas Combustion:

EPA F-Factor for Natural Gas: 8,710 dscf/MMBtu at 68 °F, equivalent to

$$Corrected\ F-factor = \left(\frac{8{,}710\,dscf}{MMBtu}\right) \times \left(\frac{60°F + 459.6}{68°F + 459.6}\right) = 8{,}578\,\frac{dscf}{MMBtu}\ \ at\ 60°F$$

$$\frac{0.00285\,lb - SOx}{MMBtu} \times \frac{MMBtu}{8{,}578\,dscf} \times \frac{1\,lb \cdot mol}{64\,lb} \times \frac{10.73\,psi \cdot ft^3}{lb \cdot mol \cdot °R} \times \frac{520°R}{14.7\,psi} \times \frac{1{,}000{,}000 \cdot parts}{million} = 1.97\,\frac{parts}{million}$$

$$SulfurConcentration = 1.97\,\frac{parts}{million} < 2{,}000\ \text{ppmv (or 0.2\%)}$$

Thus, compliance with District Rule 4801 requirements is expected.

California Environmental Quality Act (CEQA)

CEQA requires each public agency to adopt objectives, criteria, and specific procedures consistent with CEQA Statutes and the CEQA Guidelines for administering its responsibilities under CEQA, including the orderly evaluation of projects and preparation of environmental documents. The District adopted its *Environmental Review Guidelines* (ERG) in 2001. The basic purposes of CEQA are to:

- Inform governmental decision-makers and the public about the potential, significant environmental effects of proposed activities;
- Identify the ways that environmental damage can be avoided or significantly reduced;
- Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible; and
- Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

The District performed an Engineering Evaluation (this document) for the proposed project and determined that the project specific emission units are not subject to Best Available Control Technology (BACT) requirements. Furthermore, the District has determined that potential emission increases would have a less than significant health impact on sensitive receptors.

Issuance of permits for emissions units that are not subject to BACT requirements and with a health impact less than significant is a matter of ensuring conformity with applicable District rules and regulations and does not require discretionary judgment or deliberation. Thus, the District concludes that this permitting action constitutes a ministerial approval. Section 21080 of the Public Resources Code exempts from the application of CEQA those projects over which a public agency exercises only ministerial approval. Therefore, the District finds that this project is exempt from the provisions of CEQA.

California Health & Safety Code 42301.6 (School Notice)

The proposed equipment will not be located within 1000' of a k-12 school. Therefore, the public notification requirement of California Health and Safety Code 42301.6 is not applicable to this project.

IX. RECOMMENDATION

Compliance with all applicable rules and regulations is expected. Issue Authority to Construct permits N-2253-15-13, '-16-13, and '-17-13 subject to the permit conditions on the attached draft Authority to Construct permit in Appendix I upon completion of the 30-day public notice and 45-day EPA comment period.

X. BILLING INFORMATION

Annual Permit Fees			
Permit Number	**Fee Schedule**	**Fee Description**	**Previous Fee Schedule**
N-2253-15-13	3020-02-G	7.7 MMBtu/hr	3020-02-G
N-2253-16-13	3020-02-G	7.7 MMBtu/hr	3020-02-G
N-2253-17-13	3020-02-G	7.7 MMBtu/hr	3020-02-G

APPENDICES

Appendix I: Draft Authority to Construct Permits
Appendix II: Current Permits to Operate
Appendix III: GHG Calculations
Appendix IV: Title V Compliance Certification Form
Appendix V: Quarterly Net Emission Change Calculations

APPENDIX I

Draft Authority to Construct Permits

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT

PERMIT NO: N-2253-15-13

ISSUANCE DATE: DRAFT

LEGAL OWNER OR OPERATOR: BALL METAL FOOD CONTAINER CORP.
MAILING ADDRESS: P O BOX 589
BROOMFIELD, CO 80038-0589

LOCATION: 300 W GREGER ST
OAKDALE, CA 95361-8613

EQUIPMENT DESCRIPTION:
MODIFICATION OF SHEET COATING OPERATION #2 CONSISTING OF A WAGNER MODEL 15X44-A SHEET COATER AND A 7.7 MMBTU/HR YOUNG BROS. KELGRAF OVEN WITH MAXON CYCLOMAX LOW NOX BURNERS. THE COATING APPLICATION EQUIPMENT AND THE OVEN ARE ALL VENTED TO AN 8.0 MMBTU/HR SHARED THERMAL OXIDIZER EQUIPPED WITH A HEAT RECOVERY SYSTEM THAT TRANSFERS THERMAL OXIDIZER EXHAUST INTO THE CURING OVEN TO REPLACE THE EXISTING CURING OVEN BURNER SYSTEM WITH A 4.9 MMBTU/HR MAXON CYCLOMAX LOW NOX BURNER SYSTEM (OR EQUIVALENT) SUCH THAT THE POST-PROJECT EQUIPMENT DESCRIPTION BECOMES: SHEET COATING OPERATION #2 CONSISTING OF A WAGNER MODEL 15X44-A SHEET COATER AND A 4.9 MMBTU/HR YOUNG BROS. KELGRAF OVEN WITH MAXON CYCLOMAX LOW NOX BURNERS (OR EQUIVALENT). THE COATING APPLICATION EQUIPMENT AND THE OVEN ARE ALL VENTED TO AN 8.0 MMBTU/HR SHARED THERMAL OXIDIZER EQUIPPED WITH A HEAT RECOVERY SYSTEM THAT TRANSFERS THERMAL OXIDIZER EXHAUST INTO THE CURING OVEN

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. The permittee shall obtain written District approval for the use of any equivalent equipment not specifically approved by this Authority to Construct. Approval of the equivalent equipment shall be made only after the District's determination that the submitted design and performance of the proposed alternate equipment is equivalent to the specifically authorized equipment. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

DRAFT

DAVID WARNER, Director of Permit Services
N-2253-15-13 Mar 6 2013 9:51AM -- HARADERJ : Joint Inspection NOT Required

4. The permittee's request for approval of equivalent equipment shall include the make, model, manufacturer's maximum rating, manufacturer's guaranteed emission rates, equipment drawing(s), and operational characteristics/parameters. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Alternate equipment shall be of the same class and category of source as the equipment authorized by the Authority to Construct. [District Rule 2201] Federally Enforceable Through Title V Permit
6. No emission factor and no emission shall be greater for the alternate equipment than for the proposed equipment. No changes in the hours of operation, operating rate, throughput, or firing rate may be authorized for any alternate equipment. [District Rule 2201] Federally Enforceable Through Title V Permit
7. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
8. No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (2/17/05). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101] Federally Enforceable Through Title V Permit
9. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
10. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule and Rule 4604] Federally Enforceable Through Title V Permit
11. The VOC contaminated air stream from the coating application operation and the curing oven shall be vented to the thermal oxidizer prior to discharge into the atmosphere at all times. [District NSR Rule and Rule 4604] Federally Enforceable Through Title V Permit
12. The thermal oxidizer shall be maintained at a minimum temperature of 1,490 Degrees F to provide at least 98.5% VOC capture and control and the VOC emission control system shall reduce VOC emissions , at all times, to a level which would have been achieved through the use of materials compliant with the applicable requirements of Rule 4604, Sections 5.1 and 5.4 (9/20/07). [District NSR Rule, Rules 2520, 9.3.2, and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
13. The thermal oxidizer shall be equipped with an operational continuous temperature monitoring and recording device. [District NSR Rule, Rules 2520, 9.3.2, and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
14. An excursion is deemed to occur when the afterburner temperature drops below the minimum operating temperature of 1490 Degrees F. Upon detecting any excursion, the permittee shall investigate the excursion and take corrective action to minimize emissions and prevent recurrence of the excursion as expeditiously as practicable. Any record of an excursion shall be reported by sending a copy of such record to the APCO within 96 hours following the occurrence. Such report shall include an explanation of the cause of the excursion and the corrective action taken. [District Rule 4604] Federally Enforceable Through Title V Permit
15. Emissions from combustion in the curing oven shall not exceed any of the following limits: 0.024 lb-NOx/MMBtu (equivalent to 2.1 ppmvd NOx @ 19% O2), 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 0.15 lb-CO/MMBtu (equivalent to 22 ppmvd CO @ 19% O2), and 0.005 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Emissions from the shared thermal oxidizer, due to the combustion of natural gas, shall not exceed any of the following limits: 0.098 lb-NOx/MMBtu, 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 0.086 lb-CO/MMBtu, and 0.005 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
17. The VOC emissions due to coating and solvent use shall not exceed 36.7 pounds during any one day. [District NSR Rule and 40 CFR Part 64] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

18. The combined VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18, shall not exceed 10,366 pounds during the first calendar quarter, 9,941 pounds during the second calendar quarter, 10,187 pounds during the third calendar quarter and 10,027 pounds during the fourth calendar quarter. The first and fourth calendar quarter VOC emissions may be increased by the amount of second and third calendar quarter VOC's not emitted. [District Rule 2201] Federally Enforceable Through Title V Permit

19. The combined VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18, shall not exceed 40,521 pounds during any consecutive 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit

20. The operator shall source test the thermal oxidizer at least once every twelve months to demonstrate compliance with the VOC control efficiency requirements. [District Rules 1081, 2520, 9.3.2, and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit

21. The control efficiency of VOC emission control device(s) shall be determined using EPA Methods 2, 2A, or 2D for measuring flow rates and EPA Methods 25, 25A, or 25B for measuring total gaseous organic concentrations at the inlet and outlet of the control device. EPA Method 18 or ARB Method 422 shall be used to determine the emissions of exempt compounds. [District Rule 4604] Federally Enforceable Through Title V Permit

22. Source testing of the control efficiency of VOC emission control device shall be performed under conditions representative of normal operating conditions using non-compliant coating and under conditions specified in the Permit-To-Operate. [District Rule 4604] Federally Enforceable Through Title V Permit

23. Source testing to measure NOx and CO emissions from the curing oven exhaust shall be conducted at least once every 24 months. [District Rule 2201] Federally Enforceable Through Title V Permit

24. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis. [District Rule 2201] Federally Enforceable Through Title V Permit

25. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rule 2201] Federally Enforceable Through Title V Permit

26. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 2201] Federally Enforceable Through Title V Permit

27. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4309. [District Rule 2201] Federally Enforceable Through Title V Permit

28. All test results for NOx and CO shall be reported in ppmv @ 19% O2, corrected to dry stack conditions. [District Rule 2201] Federally Enforceable Through Title V Permit

29. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rule 2201] Federally Enforceable Through Title V Permit

30. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rules 1081 and 2520, 9.3.2] Federally Enforceable Through Title V Permit

31. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rules 1081 and 2520, 9.3.2] Federally Enforceable Through Title V Permit

32. The owner or operator shall submit a VOC Emission Control System Operation and Maintenance Plan in accordance with the provisions outlined in Section 6.5 of District Rule 4604. [District Rule 4604] Federally Enforceable Through Title V Permit

33. An operator shall not apply any coating except by the use of one or more of the following methods is utilized: flow, roll, dip, or hand application. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rules 2201 and 4604] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

34. All solvent cleaning activities shall be performed using solvents with VOC contents not exceeding 25 g/l (0.21 lb/gal) unless such cleaning operations are performed within the control of an APCO-approved emission control system that meets the requirements of District Rule 4604 (9/20/07). [District Rule 4604] Federally Enforceable Through Title V Permit

35. Solvent shall not be atomized into the open air. This provision shall not apply to the cleaning of nozzle tips of automated spray equipment systems, except for robotic systems, and cleaning with spray bottles or containers described in section 5.4.4.2 of Rule 4604 (9/20/07). [District Rule 4604] Federally Enforceable Through Title V Permit

36. Permittee shall not use VOC-containing materials to clean spray equipment used for the application of coatings unless an enclosed system or equipment proven to be equally effective in controlling emissions is used for cleaning. [District Rule 4604] Federally Enforceable Through Title V Permit

37. An operator shall store or dispose of fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc; coatings; adhesives; catalysts; and thinners in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4604] Federally Enforceable Through Title V Permit

38. VOC content of coating(s), as applied, and of solvents shall be determined by United States Environmental Protection Agency (EPA) Test Method 24 or 24A, or South Coast Air Quality Management District (SCAQMD) Method 304 (Determination of Volatile Organic Compounds in Various Materials) on an annual basis, or by using the manufacturer's product formulation data and the formula for "Grams of VOC per liter of Material" as allowed in District Rule 4604, Section 3.0 (9/20/07). If the coating/solvent manufacturers provide certification that the previously mentioned methods are used to determine the VOC content, copies of the coating/solvent product data sheets and the certifications may be maintained, used to calculate the VOC content of the coating, as applied, and shall be considered compliance with this condition. [District Rules 2520, 9.3.2 and 4604] Federally Enforceable Through Title V Permit

39. The content of exempt halogenated VOCs shall be determined by using the California Air Resources Board (ARB) Test Method 432 or SCAQMD Test Method 303 (Determination of Exempt Compounds) on an annual basis, or by using the manufacturer's product formulation data and the formula for "Grams of VOC per liter of Material" as allowed in District Rule 4604, Section 3.0 (9/20/07). If the coating/solvent manufacturers provide certification that the previously mentioned methods are used to determine the VOC content, copies of the coating/solvent product data sheets and the certifications may be maintained, used to calculate the VOC content of the coating, as applied, and shall be considered compliance with this condition. [District Rules 2520, 9.3.2 and 4604] Federally Enforceable Through Title V Permit

40. Daily records of the following shall be kept: (a) The specific coatings used and the mix ratio of the components added to the coatings prior to application; (b) The volume of each coating used in gallons; (c) The specific solvent used for clean-up and surface preparation; (d) The volume of each solvent used; (e) The VOC emissions due to coating and solvent usage from this permit unit; (f). The operating temperature of the thermal oxidizer. [District Rules 1070, 2520, 9.3.2 and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit

41. A list of the coatings, catalysts and reducers used, the mix ratio of the components used, the VOC content of each coating used (as applied) and of the VOC content of each solvent used for clean-up and surface preparation shall be kept. The list shall be made available to the District upon request. [District Rules 2520, 9.3.2 and 4604] Federally Enforceable Through Title V Permit

42. Records of the combined quarterly VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18 (including the VOC's due to combustion), shall be kept. The records shall be updated at least weekly. [District Rules 1070 and 2520, 9.3.2] Federally Enforceable Through Title V Permit

43. Records of the combined rolling 12-month VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18 (including the VOC's due to combustion), shall be kept. The records shall be updated at least monthly. [District Rule 2201] Federally Enforceable Through Title V Permit

44. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 2201 and 4604] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT

PERMIT NO: N-2253-16-13

ISSUANCE DATE: DRAFT

LEGAL OWNER OR OPERATOR: BALL METAL FOOD CONTAINER CORP.
MAILING ADDRESS: P O BOX 589
BROOMFIELD, CO 80038-0589

LOCATION: 300 W GREGER ST
OAKDALE, CA 95361-8613

EQUIPMENT DESCRIPTION:
MODIFICATION OF SHEET COATING OPERATION #3 CONSISTING OF A WAGNER MODEL 15X44-A SHEET COATER AND A 9.4 MMBTU/HR YOUNG BROS. KELGRAF OVEN (SHARED WITH N-2253-18) WITH MAXON CYCLOMAX LOW NOX BURNERS. THE COATING APPLICATION EQUIPMENT AND THE OVEN ARE ALL VENTED TO AN 8.0 MMBTU/HR SHARED THERMAL OXIDIZER EQUIPPED WITH A HEAT RECOVERY SYSTEM THAT TRANSFERS THERMAL OXIDIZER EXHAUST INTO THE CURING OVEN TO REPLACE THE EXISTING CURING OVEN BURNER SYSTEM WITH A 4.9 MMBTU/HR MAXON CYCLOMAX LOW NOX BURNER SYSTEM (OR EQUIVALENT) SUCH THAT THE POST-PROJECT EQUIPMENT DESCRIPTION BECOMES: SHEET COATING OPERATION #3 CONSISTING OF A WAGNER MODEL 15X44-A SHEET COATER AND A 4.9 MMBTU/HR YOUNG BROS. KELGRAF OVEN (SHARED WITH N-2253-18) WITH MAXON CYCLOMAX LOW NOX BURNERS (OR EQUIVALENT). THE COATING APPLICATION EQUIPMENT AND THE OVEN ARE ALL VENTED TO AN 8.0 MMBTU/HR SHARED THERMAL OXIDIZER EQUIPPED WITH A HEAT RECOVERY SYSTEM THAT TRANSFERS THERMAL OXIDIZER EXHAUST INTO THE CURING OVEN

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

DRAFT

DAVID WARNER, Director of Permit Services
N-2253-16-13 Mar 6 2013 8:51AM – HARADERJ : Joint Inspection NOT Required

3. The permittee shall obtain written District approval for the use of any equivalent equipment not specifically approved by this Authority to Construct. Approval of the equivalent equipment shall be made only after the District's determination that the submitted design and performance of the proposed alternate equipment is equivalent to the specifically authorized equipment. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The permittee's request for approval of equivalent equipment shall include the make, model, manufacturer's maximum rating, manufacturer's guaranteed emission rates, equipment drawing(s), and operational characteristics/parameters. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Alternate equipment shall be of the same class and category of source as the equipment authorized by the Authority to Construct. [District Rule 2201] Federally Enforceable Through Title V Permit
6. No emission factor and no emission shall be greater for the alternate equipment than for the proposed equipment. No changes in the hours of operation, operating rate, throughput, or firing rate may be authorized for any alternate equipment. [District Rule 2201] Federally Enforceable Through Title V Permit
7. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
8. No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (2/17/05). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101] Federally Enforceable Through Title V Permit
9. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
10. {1898} The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
11. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule and Rule 4604] Federally Enforceable Through Title V Permit
12. The VOC contaminated air stream from the coating application operation and the curing oven shall be vented to the thermal oxidizer prior to discharge into the atmosphere at all times. [District NSR Rule and Rule 4604] Federally Enforceable Through Title V Permit
13. The thermal oxidizer shall be maintained at a minimum temperature of 1,490 Degrees F to provide at least 98.5% VOC capture and control and the VOC emission control system shall reduce VOC emissions , at all times, to a level which would have been achieved through the use of materials compliant with the applicable requirements of Rule 4604, Sections 5.1 and 5.4 (9/20/07). [District NSR Rule, Rules 2520, 9.3.2, and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
14. The thermal oxidizer shall be equipped with an operational continuous temperature monitoring and recording device. [District NSR Rule, Rules 2520, 9.3.2, and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
15. An excursion is deemed to occur when the afterburner temperature drops below the minimum operating temperature of 1490 Degrees F. Upon detecting any excursion, the permittee shall investigate the excursion and take corrective action to minimize emissions and prevent recurrence of the excursion as expeditiously as practicable. Any record of an excursion shall be reported by sending a copy of such record to the APCO within 96 hours following the occurrence. Such report shall include an explanation of the cause of the excursion and the corrective action taken. [District Rule 4604] Federally Enforceable Through Title V Permit
16. Emissions from combustion in the curing oven shall not exceed any of the following limits: 0.024 lb-NOx/MMBtu (equivalent to 2.1 ppmvd NOx @ 19% O2), 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 0.15 lb-CO/MMBtu (equivalent to 22 ppmvd CO @ 19% O2), and 0.005 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Emissions from the shared thermal oxidizer, due to the combustion of natural gas, shall not exceed any of the following limits: 0.098 lb-NOx/MMBtu, 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 0.086 lb-CO/MMBtu, and 0.005 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

18. The VOC emissions due to coating and solvent use shall not exceed 36.7 pounds during any one day. [District NSR Rule and 40 CFR Part 64] Federally Enforceable Through Title V Permit

19. The combined VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18, shall not exceed 10,366 pounds during the first calendar quarter, 9,941 pounds during the second calendar quarter, 10,187 pounds during the third calendar quarter and 10,027 pounds during the fourth calendar quarter. The first and fourth calendar quarter VOC emissions may be increased by the amount of second and third calendar quarter VOC's not emitted. [District Rule 2201] Federally Enforceable Through Title V Permit

20. The combined VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18, shall not exceed 40,521 pounds during any consecutive 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit

21. The operator shall source test the thermal oxidizer at least once every twelve months to demonstrate compliance with the VOC control efficiency requirements. [District Rules 1081, 2520, 9.3.2, and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit

22. The control efficiency of VOC emission control device(s) shall be determined using EPA Methods 2, 2A, or 2D for measuring flow rates and EPA Methods 25, 25A, or 25B for measuring total gaseous organic concentrations at the inlet and outlet of the control device. EPA Method 18 or ARB Method 422 shall be used to determine the emissions of exempt compounds. [District Rule 4604] Federally Enforceable Through Title V Permit

23. Source testing of the control efficiency of VOC emission control device shall be performed under conditions representative of normal operating conditions using non-compliant coating and under conditions specified in the Permit-To-Operate. [District Rule 4604] Federally Enforceable Through Title V Permit

24. Source testing to measure NOx and CO emissions from the curing oven exhaust shall be conducted at least once every 24 months. [District Rule 2201] Federally Enforceable Through Title V Permit

25. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis. [District Rule 2201] Federally Enforceable Through Title V Permit

26. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rule 2201] Federally Enforceable Through Title V Permit

27. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 2201] Federally Enforceable Through Title V Permit

28. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4309. [District Rule 2201] Federally Enforceable Through Title V Permit

29. All test results for NOx and CO shall be reported in ppmv @ 19% O2, corrected to dry stack conditions. [District Rule 2201] Federally Enforceable Through Title V Permit

30. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rule 2201] Federally Enforceable Through Title V Permit

31. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rules 1081 and 2520, 9.3.2] Federally Enforceable Through Title V Permit

32. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rules 1081 and 2520, 9.3.2] Federally Enforceable Through Title V Permit

33. The owner or operator shall submit a VOC Emission Control System Operation and Maintenance Plan in accordance with the provisions outlined in Section 6.5 of District Rule 4604. [District Rule 4604] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

34. An operator shall not apply any coating except by the use of one or more of the following methods is utilized: flow, roll, dip, or hand application. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rules 2201 and 4604] Federally Enforceable Through Title V Permit

35. All solvent cleaning activities shall be performed using solvents with VOC contents not exceeding 25 g/l (0.21 lb/gal) unless such cleaning operations are performed within the control of an APCO-approved emission control system that meets the requirements of District Rule 4604 (9/20/07). [District Rule 4604] Federally Enforceable Through Title V Permit

36. Solvent shall not be atomized into the open air. This provision shall not apply to the cleaning of nozzle tips of automated spray equipment systems, except for robotic systems, and cleaning with spray bottles or containers described in section 5.4.4.2 of Rule 4604 (9/20/07). [District Rule 4604] Federally Enforceable Through Title V Permit

37. Permittee shall not use VOC-containing materials to clean spray equipment used for the application of coatings unless an enclosed system or equipment proven to be equally effective in controlling emissions is used for cleaning. [District Rule 4604] Federally Enforceable Through Title V Permit

38. An operator shall store or dispose of fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc; coatings; adhesives; catalysts; and thinners in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4604] Federally Enforceable Through Title V Permit

39. VOC content of coating(s), as applied, and of solvents shall be determined by United States Environmental Protection Agency (EPA) Test Method 24 or 24A, or South Coast Air Quality Management District (SCAQMD) Method 304 (Determination of Volatile Organic Compounds in Various Materials) on an annual basis, or by using the manufacturer's product formulation data and the formula for "Grams of VOC per liter of Material" as allowed in District Rule 4604, Section 3.0 (9/20/07). If the coating/solvent manufacturers provide certification that the previously mentioned methods are used to determine the VOC content, copies of the coating/solvent product data sheets and the certifications may be maintained, used to calculate the VOC content of the coating, as applied, and shall be considered compliance with this condition. [District Rules 2520, 9.3.2 and 4604] Federally Enforceable Through Title V Permit

40. The content of exempt halogenated VOCs shall be determined by using the California Air Resources Board (ARB) Test Method 432 or SCAQMD Test Method 303 (Determination of Exempt Compounds) on an annual basis, or by using the manufacturer's product formulation data and the formula for "Grams of VOC per liter of Material" as allowed in District Rule 4604, Section 3.0 (9/20/07). If the coating/solvent manufacturers provide certification that the previously mentioned methods are used to determine the VOC content, copies of the coating/solvent product data sheets and the certifications may be maintained, used to calculate the VOC content of the coating, as applied, and shall be considered compliance with this condition. [District Rules 2520, 9.3.2 and 4604] Federally Enforceable Through Title V Permit

41. Daily records of the following shall be kept: (a) The specific coatings used and the mix ratio of the components added to the coatings prior to application; (b) The volume of each coating used in gallons; (c) The specific solvent used for clean-up and surface preparation; (d) The volume of each solvent used; (e) The VOC emissions due to coating and solvent usage from this permit unit; (f). The operating temperature of the thermal oxidizer. [District Rules 1070, 2520, 9.3.2 and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit

42. A list of the coatings, catalysts and reducers used, the mix ratio of the components used, the VOC content of each coating used (as applied) and of the VOC content of each solvent used for clean-up and surface preparation shall be kept. The list shall be made available to the District upon request. [District Rules 2520, 9.3.2 and 4604] Federally Enforceable Through Title V Permit

43. Records of the combined quarterly VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18 (including the VOC's due to combustion), shall be kept. The records shall be updated at least weekly. [District Rules 1070 and 2520, 9.3.2] Federally Enforceable Through Title V Permit

44. Records of the combined VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18 (including the VOC's due to combustion), shall be kept for consecutive 12-month period. [District NSR Rule] Federally Enforceable Through Title V Permit

45. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 2201 and 4604] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT

PERMIT NO: N-2253-17-13

ISSUANCE DATE: DRAFT

LEGAL OWNER OR OPERATOR: BALL METAL FOOD CONTAINER CORP.
MAILING ADDRESS: P O BOX 589
BROOMFIELD, CO 80038-0589

LOCATION: 300 W GREGER ST
OAKDALE, CA 95361-8613

EQUIPMENT DESCRIPTION:
MODIFICATION OF SHEET COATING OPERATION #4 CONSISTING OF A WAGNER MODEL 15X44-A SHEET COATER AND A 7.3 MMBTU/HR YOUNG BROS. KELGRAF OVEN WITH MAXON CYCLOMAX LOW NOX BURNERS. THE COATING APPLICATION EQUIPMENT AND THE OVEN ARE ALL VENTED TO AN 8.0 MMBTU/HR SHARED THERMAL OXIDIZER EQUIPPED WITH A HEAT RECOVERY SYSTEM THAT TRANSFERS THERMAL OXIDIZER EXHAUST INTO THE CURING OVEN: ROUTINE REPLACMENT OF BURNERS

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. The permittee shall obtain written District approval for the use of any equivalent equipment not specifically approved by this Authority to Construct. Approval of the equivalent equipment shall be made only after the District's determination that the submitted design and performance of the proposed alternate equipment is equivalent to the specifically authorized equipment. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The permittee's request for approval of equivalent equipment shall include the make, model, manufacturer's maximum rating, manufacturer's guaranteed emission rates, equipment drawing(s), and operational characteristics/parameters. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Alternate equipment shall be of the same class and category of source as the equipment authorized by the Authority to Construct. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

DRAFT

DAVID WARNER, Director of Permit Services
N-2253-17-13 , Mar 0 2013 8:51AM – HARADERJ : Joint Inspection NOT Required

6. No emission factor and no emission shall be greater for the alternate equipment than for the proposed equipment. No changes in the hours of operation, operating rate, throughput, or firing rate may be authorized for any alternate equipment. [District Rule 2201] Federally Enforceable Through Title V Permit
7. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
8. No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (2/17/05). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101] Federally Enforceable Through Title V Permit
9. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
10. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule and Rule 4604] Federally Enforceable Through Title V Permit
11. The VOC contaminated air stream from the coating application operation and the curing oven shall be vented to the thermal oxidizer prior to discharge into the atmosphere at all times. [District NSR Rule and Rule 4604] Federally Enforceable Through Title V Permit
12. The thermal oxidizer shall be maintained at a minimum temperature of 1,490 Degrees F to provide at least 98.5% VOC capture and control and the VOC emission control system shall reduce VOC emissions , at all times, to a level which would have been achieved through the use of materials compliant with the applicable requirements of Rule 4604, Sections 5.1 and 5.4 (9/20/07). [District NSR Rule, Rules 2520, 9.3.2, and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
13. The thermal oxidizer shall be equipped with an operational continuous temperature monitoring and recording device. [District NSR Rule, Rules 2520, 9.3.2, and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
14. An excursion is deemed to occur when the afterburner temperature drops below the minimum operating temperature of 1490 Degrees F. Upon detecting any excursion, the permittee shall investigate the excursion and take corrective action to minimize emissions and prevent recurrence of the excursion as expeditiously as practicable. Any record of an excursion shall be reported by sending a copy of such record to the APCO within 96 hours following the occurrence. Such report shall include an explanation of the cause of the excursion and the corrective action taken. [District Rule 4604] Federally Enforceable Through Title V Permit
15. Emissions from combustion in the curing oven shall not exceed any of the following limits: 0.024 lb-NOx/MMBtu (equivalent to 2.1 ppmvd NOx @ 19% O2), 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 0.15 lb-CO/MMBtu (equivalent to 22 ppmvd CO @ 19% O2), and 0.005 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Emissions from the shared thermal oxidizer, due to the combustion of natural gas, shall not exceed any of the following limits: 0.098 lb-NOx/MMBtu, 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 0.086 lb-CO/MMBtu, and 0.005 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
17. The VOC emissions due to coating and solvent use shall not exceed 36.7 pounds during any one day. [District NSR Rule and 40 CFR Part 64] Federally Enforceable Through Title V Permit
18. The combined VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18, shall not exceed 10,366 pounds during the first calendar quarter, 9,941 pounds during the second calendar quarter, 10,187 pounds during the third calendar quarter and 10,027 pounds during the fourth calendar quarter. The first and fourth calendar quarter VOC emissions may be increased by the amount of second and third calendar quarter VOC's not emitted. [District Rule 2201] Federally Enforceable Through Title V Permit
19. The combined VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18, shall not exceed 40,521 pounds during any consecutive 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

20. The operator shall source test the thermal oxidizer at least once every twelve months to demonstrate compliance with the VOC control efficiency requirements. [District Rules 1081, 2520, 9.3.2, and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit

21. The control efficiency of VOC emission control device(s) shall be determined using EPA Methods 2, 2A, or 2D for measuring flow rates and EPA Methods 25, 25A, or 25B for measuring total gaseous organic concentrations at the inlet and outlet of the control device. EPA Method 18 or ARB Method 422 shall be used to determine the emissions of exempt compounds. [District Rule 4604] Federally Enforceable Through Title V Permit

22. Source testing of the control efficiency of VOC emission control device shall be performed under conditions representative of normal operating conditions using non-compliant coating and under conditions specified in the Permit-To-Operate. [District Rule 4604] Federally Enforceable Through Title V Permit

23. Source testing to measure NOx and CO emissions from the curing oven exhaust shall be conducted at least once every 24 months. [District Rule 2201] Federally Enforceable Through Title V Permit

24. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis. [District Rule 2201] Federally Enforceable Through Title V Permit

25. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rule 2201] Federally Enforceable Through Title V Permit

26. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 2201] Federally Enforceable Through Title V Permit

27. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4309. [District Rule 2201] Federally Enforceable Through Title V Permit

28. All test results for NOx and CO shall be reported in ppmv @ 19% O2, corrected to dry stack conditions. [District Rule 2201] Federally Enforceable Through Title V Permit

29. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rule 2201] Federally Enforceable Through Title V Permit

30. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rules 1081 and 2520, 9.3.2] Federally Enforceable Through Title V Permit

31. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rules 1081 and 2520, 9.3.2] Federally Enforceable Through Title V Permit

32. The owner or operator shall submit a VOC Emission Control System Operation and Maintenance Plan in accordance with the provisions outlined in Section 6.5 of District Rule 4604. [District Rule 4604] Federally Enforceable Through Title V Permit

33. An operator shall not apply any coating except by the use of one or more of the following methods is utilized: flow, roll, dip, or hand application. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rules 2201 and 4604] Federally Enforceable Through Title V Permit

34. All solvent cleaning activities shall be performed using solvents with VOC contents not exceeding 25 g/l (0.21 lb/gal) unless such cleaning operations are performed within the control of an APCO-approved emission control system that meets the requirements of District Rule 4604 (9/20/07). [District Rule 4604] Federally Enforceable Through Title V Permit

35. Solvent shall not be atomized into the open air. This provision shall not apply to the cleaning of nozzle tips of automated spray equipment systems, except for robotic systems, and cleaning with spray bottles or containers described in section 5.4.4.2 of Rule 4604 (9/20/07). [District Rule 4604] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

36. Permittee shall not use VOC-containing materials to clean spray equipment used for the application of coatings unless an enclosed system or equipment proven to be equally effective in controlling emissions is used for cleaning. [District Rule 4604] Federally Enforceable Through Title V Permit

37. An operator shall store or dispose of fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc; coatings; adhesives; catalysts; and thinners in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4604] Federally Enforceable Through Title V Permit

38. VOC content of coating(s), as applied, and of solvents shall be determined by United States Environmental Protection Agency (EPA) Test Method 24 or 24A, or South Coast Air Quality Management District (SCAQMD) Method 304 (Determination of Volatile Organic Compounds in Various Materials) on an annual basis, or by using the manufacturer's product formulation data and the formula for "Grams of VOC per liter of Material" as allowed in District Rule 4604, Section 3.0 (9/20/07). If the coating/solvent manufacturers provide certification that the previously mentioned methods are used to determine the VOC content, copies of the coating/solvent product data sheets and the certifications may be maintained, used to calculate the VOC content of the coating, as applied, and shall be considered compliance with this condition. [District Rules 2520, 9.3.2 and 4604] Federally Enforceable Through Title V Permit

39. The content of exempt halogenated VOCs shall be determined by using the California Air Resources Board (ARB) Test Method 432 or SCAQMD Test Method 303 (Determination of Exempt Compounds) on an annual basis, or by using the manufacturer's product formulation data and the formula for "Grams of VOC per liter of Material" as allowed in District Rule 4604, Section 3.0 (9/20/07). If the coating/solvent manufacturers provide certification that the previously mentioned methods are used to determine the VOC content, copies of the coating/solvent product data sheets and the certifications may be maintained, used to calculate the VOC content of the coating, as applied, and shall be considered compliance with this condition. [District Rules 2520, 9.3.2 and 4604] Federally Enforceable Through Title V Permit

40. Daily records of the following shall be kept: (a) The specific coatings used and the mix ratio of the components added to the coatings prior to application; (b) The volume of each coating used in gallons; (c) The specific solvent used for clean-up and surface preparation; (d) The volume of each solvent used; (e) The VOC emissions due to coating and solvent usage from this permit unit; (f). The operating temperature of the thermal oxidizer. [District Rules 1070, 2520, 9.3.2 and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit

41. A list of the coatings, catalysts and reducers used, the mix ratio of the components used, the VOC content of each coating used (as applied) and of the VOC content of each solvent used for clean-up and surface preparation shall be kept. The list shall be made available to the District upon request. [District Rules 2520, 9.3.2 and 4604] Federally Enforceable Through Title V Permit

42. Records of the combined quarterly VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18 (including the VOC's due to combustion), shall be kept. The records shall be updated at least weekly. [District Rules 1070 and 2520, 9.3.2] Federally Enforceable Through Title V Permit

43. Records of the combined VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18 (including the VOC's due to combustion), shall be kept for consecutive 12-month period. [District NSR Rule] Federally Enforceable Through Title V Permit

44. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 2201 and 4604] Federally Enforceable Through Title V Permit

APPENDIX II

Current Permits to Operate

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: N-2253-15-12 **EXPIRATION DATE:** 10/31/2015

EQUIPMENT DESCRIPTION:
SHEET COATING OPERATION #2 CONSISTING OF A WAGNER MODEL 15X44-A SHEET COATER AND A 7.7 MMBTU/HR YOUNG BROS. KELGRAF OVEN WITH MAXON CYCLOMAX LOW NOX BURNERS. THE COATING APPLICATION EQUIPMENT AND THE OVEN ARE ALL VENTED TO AN 8.0 MMBTU/HR SHARED THERMAL OXIDIZER EQUIPPED WITH A HEAT RECOVERY SYSTEM THAT TRANSFERS THERMAL OXIDIZER EXHAUST INTO THE CURING OVEN

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule and Rule 4604]
3. The VOC contaminated air stream from the coating application operation and the curing oven shall be vented to the thermal oxidizer prior to discharge into the atmosphere at all times. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The thermal oxidizer shall be maintained at a minimum temperature of 1,490 Degrees F to provide at least 98.5% VOC capture and control and the VOC emission control system shall reduce VOC emissions , at all times, to a level which would have been achieved through the use of materials compliant with the applicable requirements of Rule 4604, Sections 5.1 and 5.4 (9/20/07). [District NSR Rule, Rules 2520, 9.3.2, and 4604, and 40 CFR Part 64]
5. The thermal oxidizer shall be equipped with an operational continuous temperature monitoring and recording device. [District NSR Rule, Rules 2520, 9.3.2, and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
6. An excursion is deemed to occur when the afterburner temperature drops below the minimum operating temperature of 1490 Degrees F. Upon detecting any excursion, the permittee shall investigate the excursion and take corrective action to minimize emissions and prevent recurrence of the excursion as expeditiously as practicable. Any record of an excursion shall be reported by sending a copy of such record to the APCO within 96 hours following the occurrence. Such report shall include an explanation of the cause of the excursion and the corrective action taken. [District Rule 4604]
7. Emissions from combustion in the curing oven shall not exceed any of the following limits: 0.024 lb-NOx/MMBtu (equivalent to 2.1 ppmvd NOx @ 19% O2), 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 0.15 lb-CO/MMBtu (equivalent to 22 ppmvd CO @ 19% O2, or 0.005 lb-VOC/MMBtu. [District Rules 2201 and 4309]
8. Emissions from the shared thermal oxidizer, due to the combustion of natural gas, shall not exceed any of the following limits: 0.098 lb-NOx/MMBtu, 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 0.086 lb-CO/MMBtu, and 0.005 lb-VOC/MMBtu. [District Rule 2201]
9. The VOC emissions due to coating and solvent use shall not exceed 36.7 pounds during any one day. [District NSR Rule and 40 CFR Part 64] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

10. The combined VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18, shall not exceed 10,366 pounds during the first calendar quarter, 9,941 pounds during the second calendar quarter, 10,187 pounds during the third calendar quarter and 10,027 pounds during the fourth calendar quarter. The first and fourth calendar quarter VOC emissions may be increased by the amount of second and third calendar quarter VOC's not emitted. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The combined VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18, shall not exceed 40,521 pounds during any consecutive 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The operator shall source test the thermal oxidizer at least once every twelve months to demonstrate compliance with the VOC control efficiency requirements. [District Rules 1081, 2520, 9.3.2, and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
13. The control efficiency of VOC emission control device(s) shall be determined using EPA Methods 2, 2A, or 2D for measuring flow rates and EPA Methods 25, 25A, or 25B for measuring total gaseous organic concentrations at the inlet and outlet of the control device. EPA Method 18 or ARB Method 422 shall be used to determine the emissions of exempt compounds. [District Rule 4604] Federally Enforceable Through Title V Permit
14. Source testing of the control efficiency of VOC emission control device shall be performed under conditions representative of normal operating conditions using non-compliant coating and under conditions specified in the Permit-To-Operate. [District Rule 4604] Federally Enforceable Through Title V Permit
15. Source testing to measure NOx and CO emissions from the curing oven exhaust shall be conducted at least once every 24 months. [District Rules 2201 and 4309]
16. NOX emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis. [District Rule 4309]
17. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rule 4309]
18. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4309]
19. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4309. [District Rule 4309]
20. All test results for NOx and CO shall be reported in ppmv @ 19% O2, corrected to dry stack conditions. [District Rule 4309]
21. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rule 4309]
22. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rules 1081 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
23. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rules 1081 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
24. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rule 4309]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

25. If either the NOx or CO concentrations corrected to 19% O2, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rule 4309]

26. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4309]

27. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 19% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rule 4309]

28. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4309]

29. The owner or operator shall submit a VOC Emission Control System Operation and Maintenance Plan in accordance with the provisions outlined in Section 6.5 of District Rule 4604. [District Rule 4604]

30. An operator shall not apply any coating except by the use of one or more of the following methods is utilized: flow, roll, dip, or hand application. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rules 2201 and 4604]

31. All solvent cleaning activities shall be performed using solvents with VOC contents not exceeding 25 g/l (0.21 lb/gal) unless such cleaning operations are performed within the control of an APCO-approved emission control system that meets the requirements of District Rule 4604 (9/20/07). [District Rule 4604] Federally Enforceable Through Title V Permit

32. Solvent shall not be atomized into the open air. This provision shall not apply to the cleaning of nozzle tips of automated spray equipment systems, except for robotic systems, and cleaning with spray bottles or containers described in section 5.4.4.2 of Rule 4604 (9/20/07). [District Rule 4604] Federally Enforceable Through Title V Permit

33. Permittee shall not use VOC-containing materials to clean spray equipment used for the application of coatings unless an enclosed system or equipment proven to be equally effective in controlling emissions is used for cleaning. [District Rule 4604] Federally Enforceable Through Title V Permit

34. An operator shall store or dispose of fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc; coatings; adhesives; catalysts; and thinners in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4604] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

35. VOC content of coating(s), as applied, and of solvents shall be determined by United States Environmental Protection Agency (EPA) Test Method 24 or 24A, or South Coast Air Quality Management District (SCAQMD) Method 304 (Determination of Volatile Organic Compounds in Various Materials) on an annual basis, or by using the manufacturer's product formulation data and the formula for "Grams of VOC per liter of Material" as allowed in District Rule 4604, Section 3.0 (9/20/07). If the coating/solvent manufacturers provide certification that the previously mentioned methods are used to determine the VOC content, copies of the coating/solvent product data sheets and the certifications may be maintained, used to calculate the VOC content of the coating, as applied, and shall be considered compliance with this condition. [District Rules 2520, 9.3.2 and 4604] Federally Enforceable Through Title V Permit

36. The content of exempt halogenated VOCs shall be determined by using the California Air Resources Board (ARB) Test Method 432 or SCAQMD Test Method 303 (Determination of Exempt Compounds) on an annual basis, or by using the manufacturer's product formulation data and the formula for "Grams of VOC per liter of Material" as allowed in District Rule 4604, Section 3.0 (9/20/07). If the coating/solvent manufacturers provide certification that the previously mentioned methods are used to determine the VOC content, copies of the coating/solvent product data sheets and the certifications may be maintained, used to calculate the VOC content of the coating, as applied, and shall be considered compliance with this condition. [District Rules 2520, 9.3.2 and 4604] Federally Enforceable Through Title V Permit

37. Daily records of the following shall be kept: (a) The specific coatings used and the mix ratio of the components added to the coatings prior to application; (b) The volume of each coating used in gallons; (c) The specific solvent used for clean-up and surface preparation; (d) The volume of each solvent used; (e) The VOC emissions due to coating and solvent usage from this permit unit; (f). The operating temperature of the thermal oxidizer. [District Rules 1070, 2520, 9.3.2 and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit

38. A list of the coatings, catalysts and reducers used, the mix ratio of the components used, the VOC content of each coating used (as applied) and of the VOC content of each solvent used for clean-up and surface preparation shall be kept. The list shall be made available to the District upon request. [District Rules 2520, 9.3.2 and 4604] Federally Enforceable Through Title V Permit

39. Records of the combined quarterly VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18 (including the VOC's due to combustion), shall be kept. The records shall be updated at least weekly. [District Rules 1070 and 2520, 9.3.2] Federally Enforceable Through Title V Permit

40. Records of the combined VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18 (including the VOC's due to combustion), shall be kept for consecutive 12-month period. [District NSR Rule] Federally Enforceable Through Title V Permit

41. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 4604 and 4309] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: N-2253-16-12 **EXPIRATION DATE:** 10/31/2015

EQUIPMENT DESCRIPTION:
SHEET COATING OPERATION #3 CONSISTING OF A WAGNER MODEL 15X44-A SHEET COATER AND A 9.4 MMBTU/HR YOUNG BROS. KELGRAF OVEN (SHARED WITH N-2253-18) WITH MAXON CYCLOMAX LOW NOX BURNERS. THE COATING APPLICATION EQUIPMENT AND THE OVEN ARE ALL VENTED TO AN 8.0 MMBTU/HR SHARED THERMAL OXIDIZER EQUIPPED WITH A HEAT RECOVERY SYSTEM THAT TRANSFERS THERMAL OXIDIZER EXHAUST INTO THE CURING OVEN

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. The exhaust stack for the thermal oxidizer shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
3. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule and Rule 4604]
4. The VOC contaminated air stream from the coating application operation and the curing oven shall be vented to the thermal oxidizer prior to discharge into the atmosphere at all times. [District NSR Rule] Federally Enforceable Through Title V Permit
5. The thermal oxidizer shall be maintained at a minimum temperature of 1,490 Degrees F to provide at least 98.5% VOC capture and control and the VOC emission control system shall reduce VOC emissions , at all times, to a level which would have been achieved through the use of materials compliant with the applicable requirements of Rule 4604, Sections 5.1 and 5.4 (9/20/07). [District NSR Rule, Rules 2520, 9.3.2, and 4604, and 40 CFR Part 64]
6. The thermal oxidizer shall be equipped with an operational continuous temperature monitoring and recording device. [District NSR Rule, Rules 2520, 9.3.2, and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
7. An excursion is deemed to occur when the afterburner temperature drops below the minimum operating temperature of 1490 Degrees F. Upon detecting any excursion, the permittee shall investigate the excursion and take corrective action to minimize emissions and prevent recurrence of the excursion as expeditiously as practicable. Any record of an excursion shall be reported by sending a copy of such record to the APCO within 96 hours following the occurrence. Such report shall include an explanation of the cause of the excursion and the corrective action taken. [District Rule 4604]
8. Emissions from combustion in the curing oven shall not exceed any of the following limits: 0.024 lb-NOx/MMBtu (equivalent to 2.1 ppmvd NOx @ 19% O2), 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 0.15 lb-CO/MMBtu (equivalent to 22 ppmvd CO @ 19% O2, or 0.005 lb-VOC/MMBtu. [District Rules 2201 and 4309]
9. Emissions from the shared thermal oxidizer, due to the combustion of natural gas, shall not exceed any of the following limits: 0.098 lb-NOx/MMBtu, 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 0.086 lb-CO/MMBtu, and 0.005 lb-VOC/MMBtu. [District Rule 2201]
10. The VOC emissions due to coating and solvent use shall not exceed 36.7 pounds during any one day. [District NSR Rule and 40 CFR Part 64] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

11. The combined VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18, shall not exceed 10,366 pounds during the first calendar quarter, 9,941 pounds during the second calendar quarter, 10,187 pounds during the third calendar quarter and 10,027 pounds during the fourth calendar quarter. The first and fourth calendar quarter VOC emissions may be increased by the amount of second and third calendar quarter VOC's not emitted. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The combined VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18, shall not exceed 40,521 pounds during any consecutive 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The operator shall source test the thermal oxidizer at least once every twelve months to demonstrate compliance with the VOC control efficiency requirements. [District Rules 1081, 2520, 9.3.2, and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
14. The control efficiency of VOC emission control device(s) shall be determined using EPA Methods 2, 2A, or 2D for measuring flow rates and EPA Methods 25, 25A, or 25B for measuring total gaseous organic concentrations at the inlet and outlet of the control device. EPA Method 18 or ARB Method 422 shall be used to determine the emissions of exempt compounds. [District Rule 4604] Federally Enforceable Through Title V Permit
15. Source testing of the control efficiency of VOC emission control device shall be performed under conditions representative of normal operating conditions using non-compliant coating and under conditions specified in the Permit-To-Operate. [District Rule 4604] Federally Enforceable Through Title V Permit
16. Source testing to measure NOx and CO emissions from the curing oven exhaust shall be conducted at least once every 24 months. [District Rules 2201 and 4309]
17. NOX emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis. [District Rule 4309]
18. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rule 4309]
19. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4309]
20. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4309. [District Rule 4309]
21. All test results for NOx and CO shall be reported in ppmv @ 19% O2, corrected to dry stack conditions. [District Rule 4309]
22. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rule 4309]
23. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rules 1081 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
24. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rules 1081 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
25. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rule 4309]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

26. If either the NOx or CO concentrations corrected to 19% O2, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rule 4309]

27. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4309]

28. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 19% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rule 4309]

29. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4309]

30. The owner or operator shall submit a VOC Emission Control System Operation and Maintenance Plan in accordance with the provisions outlined in Section 6.5 of District Rule 4604. [District Rule 4604]

31. An operator shall not apply any coating except by the use of one or more of the following methods is utilized: flow, roll, dip, or hand application. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rules 2201 and 4604]

32. All solvent cleaning activities shall be performed using solvents with VOC contents not exceeding 25 g/l (0.21 lb/gal) unless such cleaning operations are performed within the control of an APCO-approved emission control system that meets the requirements of District Rule 4604 (9/20/07). [District Rule 4604] Federally Enforceable Through Title V Permit

33. Solvent shall not be atomized into the open air. This provision shall not apply to the cleaning of nozzle tips of automated spray equipment systems, except for robotic systems, and cleaning with spray bottles or containers described in section 5.4.4.2 of Rule 4604 (9/20/07). [District Rule 4604] Federally Enforceable Through Title V Permit

34. Permittee shall not use VOC-containing materials to clean spray equipment used for the application of coatings unless an enclosed system or equipment proven to be equally effective in controlling emissions is used for cleaning. [District Rule 4604] Federally Enforceable Through Title V Permit

35. An operator shall store or dispose of fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc; coatings; adhesives; catalysts; and thinners in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4604] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

36. VOC content of coating(s), as applied, and of solvents shall be determined by United States Environmental Protection Agency (EPA) Test Method 24 or 24A, or South Coast Air Quality Management District (SCAQMD) Method 304 (Determination of Volatile Organic Compounds in Various Materials) on an annual basis, or by using the manufacturer's product formulation data and the formula for "Grams of VOC per liter of Material" as allowed in District Rule 4604, Section 3.0 (9/20/07). If the coating/solvent manufacturers provide certification that the previously mentioned methods are used to determine the VOC content, copies of the coating/solvent product data sheets and the certifications may be maintained, used to calculate the VOC content of the coating, as applied, and shall be considered compliance with this condition. [District Rules 2520, 9.3.2 and 4604] Federally Enforceable Through Title V Permit

37. The content of exempt halogenated VOCs shall be determined by using the California Air Resources Board (ARB) Test Method 432 or SCAQMD Test Method 303 (Determination of Exempt Compounds) on an annual basis, or by using the manufacturer's product formulation data and the formula for "Grams of VOC per liter of Material" as allowed in District Rule 4604, Section 3.0 (9/20/07). If the coating/solvent manufacturers provide certification that the previously mentioned methods are used to determine the VOC content, copies of the coating/solvent product data sheets and the certifications may be maintained, used to calculate the VOC content of the coating, as applied, and shall be considered compliance with this condition. [District Rules 2520, 9.3.2 and 4604] Federally Enforceable Through Title V Permit

38. Daily records of the following shall be kept: (a) The specific coatings used and the mix ratio of the components added to the coatings prior to application; (b) The volume of each coating used in gallons; (c) The specific solvent used for clean-up and surface preparation; (d) The volume of each solvent used; (e) The VOC emissions due to coating and solvent usage from this permit unit; (f). The operating temperature of the thermal oxidizer. [District Rules 1070, 2520, 9.3.2 and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit

39. A list of the coatings, catalysts and reducers used, the mix ratio of the components used, the VOC content of each coating used (as applied) and of the VOC content of each solvent used for clean-up and surface preparation shall be kept. The list shall be made available to the District upon request. [District Rules 2520, 9.3.2 and 4604] Federally Enforceable Through Title V Permit

40. Records of the combined quarterly VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18 (including the VOC's due to combustion), shall be kept. The records shall be updated at least weekly. [District Rules 1070 and 2520, 9.3.2] Federally Enforceable Through Title V Permit

41. Records of the combined VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18 (including the VOC's due to combustion), shall be kept for consecutive 12-month period. [District NSR Rule] Federally Enforceable Through Title V Permit

42. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 4604 and 4309] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: N-2253-17-12 **EXPIRATION DATE:** 10/31/2015

EQUIPMENT DESCRIPTION:
SHEET COATING OPERATION #4 CONSISTING OF A WAGNER MODEL 15X44-A SHEET COATER AND A 7.3 MMBTU/HR YOUNG BROS. KELGRAF OVEN WITH MAXON CYCLOMAX LOW NOX BURNERS. THE COATING APPLICATION EQUIPMENT AND THE OVEN ARE ALL VENTED TO AN 8.0 MMBTU/HR SHARED THERMAL OXIDIZER EQUIPPED WITH A HEAT RECOVERY SYSTEM THAT TRANSFERS THERMAL OXIDIZER EXHAUST INTO THE CURING OVEN

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule and Rule 4604]
3. The VOC contaminated air stream from the coating application operation and the curing oven shall be vented to the thermal oxidizer prior to discharge into the atmosphere at all times. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The thermal oxidizer shall be maintained at a minimum temperature of 1,490 Degrees F to provide at least 98.5% VOC capture and control and the VOC emission control system shall reduce VOC emissions , at all times, to a level which would have been achieved through the use of materials compliant with the applicable requirements of Rule 4604, Sections 5.1 and 5.4 (9/20/07). [District NSR Rule, Rules 2520, 9.3.2, and 4604, and 40 CFR Part 64]
5. The thermal oxidizer shall be equipped with an operational continuous temperature monitoring and recording device. [District NSR Rule, Rules 2520, 9.3.2, and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
6. An excursion is deemed to occur when the afterburner temperature drops below the minimum operating temperature of 1490 Degrees F. Upon detecting any excursion, the permittee shall investigate the excursion and take corrective action to minimize emissions and prevent recurrence of the excursion as expeditiously as practicable. Any record of an excursion shall be reported by sending a copy of such record to the APCO within 96 hours following the occurrence. Such report shall include an explanation of the cause of the excursion and the corrective action taken. [District Rule 4604]
7. Emissions from combustion in the curing oven shall not exceed any of the following limits: 0.024 lb-NOx/MMBtu (equivalent to 2.1 ppmvd NOx @ 19% O2), 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 0.15 lb-CO/MMBtu (equivalent to 22 ppmvd CO @ 19% O2, or 0.005 lb-VOC/MMBtu. [District Rules 2201 and 4309]
8. Emissions from the shared thermal oxidizer, due to the combustion of natural gas, shall not exceed any of the following limits: 0.098 lb-NOx/MMBtu, 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 0.086 lb-CO/MMBtu, and 0.005 lb-VOC/MMBtu. [District Rule 2201]
9. The VOC emissions due to coating and solvent use shall not exceed 36.7 pounds during any one day. [District NSR Rule and 40 CFR Part 64] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

10. The combined VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18, shall not exceed 10,366 pounds during the first calendar quarter, 9,941 pounds during the second calendar quarter, 10,187 pounds during the third calendar quarter and 10,027 pounds during the fourth calendar quarter. The first and fourth calendar quarter VOC emissions may be increased by the amount of second and third calendar quarter VOC's not emitted. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The combined VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18, shall not exceed 40,521 pounds during any consecutive 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The operator shall source test the thermal oxidizer at least once every twelve months to demonstrate compliance with the VOC control efficiency requirements. [District Rules 1081, 2520, 9.3.2, and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
13. The control efficiency of VOC emission control device(s) shall be determined using EPA Methods 2, 2A, or 2D for measuring flow rates and EPA Methods 25, 25A, or 25B for measuring total gaseous organic concentrations at the inlet and outlet of the control device. EPA Method 18 or ARB Method 422 shall be used to determine the emissions of exempt compounds. [District Rule 4604] Federally Enforceable Through Title V Permit
14. Source testing of the control efficiency of VOC emission control device shall be performed under conditions representative of normal operating conditions using non-compliant coating and under conditions specified in the Permit-To-Operate. [District Rule 4604] Federally Enforceable Through Title V Permit
15. Source testing to measure NOx and CO emissions from the curing oven exhaust shall be conducted at least once every 24 months. [District Rules 2201 and 4309]
16. NOX emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis. [District Rule 4309]
17. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rule 4309]
18. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4309]
19. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4309. [District Rule 4309]
20. All test results for NOx and CO shall be reported in ppmv @ 19% O2, corrected to dry stack conditions. [District Rule 4309]
21. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rule 4309]
22. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rules 1081 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
23. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rules 1081 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
24. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rule 4309]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

25. If either the NOx or CO concentrations corrected to 19% O2, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rule 4309]

26. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4309]

27. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 19% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rule 4309]

28. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4309]

29. The owner or operator shall submit a VOC Emission Control System Operation and Maintenance Plan in accordance with the provisions outlined in Section 6.5 of District Rule 4604. [District Rule 4604]

30. An operator shall not apply any coating except by the use of one or more of the following methods is utilized: flow, roll, dip, or hand application. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rules 2201 and 4604]

31. All solvent cleaning activities shall be performed using solvents with VOC contents not exceeding 25 g/l (0.21 lb/gal) unless such cleaning operations are performed within the control of an APCO-approved emission control system that meets the requirements of District Rule 4604 (9/20/07). [District Rule 4604] Federally Enforceable Through Title V Permit

32. Solvent shall not be atomized into the open air. This provision shall not apply to the cleaning of nozzle tips of automated spray equipment systems, except for robotic systems, and cleaning with spray bottles or containers described in section 5.4.4.2 of Rule 4604 (9/20/07). [District Rule 4604] Federally Enforceable Through Title V Permit

33. Permittee shall not use VOC-containing materials to clean spray equipment used for the application of coatings unless an enclosed system or equipment proven to be equally effective in controlling emissions is used for cleaning. [District Rule 4604] Federally Enforceable Through Title V Permit

34. An operator shall store or dispose of fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc; coatings; adhesives; catalysts; and thinners in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4604] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

35. VOC content of coating(s), as applied, and of solvents shall be determined by United States Environmental Protection Agency (EPA) Test Method 24 or 24A, or South Coast Air Quality Management District (SCAQMD) Method 304 (Determination of Volatile Organic Compounds in Various Materials) on an annual basis, or by using the manufacturer's product formulation data and the formula for "Grams of VOC per liter of Material" as allowed in District Rule 4604, Section 3.0 (9/20/07). If the coating/solvent manufacturers provide certification that the previously mentioned methods are used to determine the VOC content, copies of the coating/solvent product data sheets and the certifications may be maintained, used to calculate the VOC content of the coating, as applied, and shall be considered compliance with this condition. [District Rules 2520, 9.3.2 and 4604] Federally Enforceable Through Title V Permit

36. The content of exempt halogenated VOCs shall be determined by using the California Air Resources Board (ARB) Test Method 432 or SCAQMD Test Method 303 (Determination of Exempt Compounds) on an annual basis, or by using the manufacturer's product formulation data and the formula for "Grams of VOC per liter of Material" as allowed in District Rule 4604, Section 3.0 (9/20/07). If the coating/solvent manufacturers provide certification that the previously mentioned methods are used to determine the VOC content, copies of the coating/solvent product data sheets and the certifications may be maintained, used to calculate the VOC content of the coating, as applied, and shall be considered compliance with this condition. [District Rules 2520, 9.3.2 and 4604] Federally Enforceable Through Title V Permit

37. Daily records of the following shall be kept: (a) The specific coatings used and the mix ratio of the components added to the coatings prior to application; (b) The volume of each coating used in gallons; (c) The specific solvent used for clean-up and surface preparation; (d) The volume of each solvent used; (e) The VOC emissions due to coating and solvent usage from this permit unit; (f). The operating temperature of the thermal oxidizer. [District Rules 1070, 2520, 9.3.2 and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit

38. A list of the coatings, catalysts and reducers used, the mix ratio of the components used, the VOC content of each coating used (as applied) and of the VOC content of each solvent used for clean-up and surface preparation shall be kept. The list shall be made available to the District upon request. [District Rules 2520, 9.3.2 and 4604] Federally Enforceable Through Title V Permit

39. Records of the combined quarterly VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18 (including the VOC's due to combustion), shall be kept. The records shall be updated at least weekly. [District Rules 1070 and 2520, 9.3.2] Federally Enforceable Through Title V Permit

40. Records of the combined VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18 (including the VOC's due to combustion), shall be kept for consecutive 12-month period. [District NSR Rule] Federally Enforceable Through Title V Permit

41. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 4604 and 4309] Federally Enforceable Through Title V Permit

APPENDIX III

GHG Calculations

GHG Calculations

1. SSPE1 Calculations for GHG's

N-2253-1-7 SIDE SEAM STRIPE SPRAY OPERATION (LINE #1) SERVED BY ONE SOUDRONIC MODEL FBB BODYMAKER AND ONE 0.6 MMBTU/HR FLYNN AERO FLAME AF-9 CURING TUNNEL. THE FUME HOOD (OVER THE COATING APPLICATOR AND CONVEYOR) AND CURING TUNNEL IS VENTED TO THE SHARED 8.0 MMBTU/HR SMITH THERMAL OXIDIZER

This unit is equipped with a 0.6 MMBtu/hr curing tunnel oven fired on natural gas. Natural gas usage for the oven is not limited. An emission factor of 116.6 lb-CO_2e/MMBtu will be used to determine the annual GHG emissions.

PE1 GHG = 0.6 MMBtu/hr x 8760 hr/year x 116.6 lb-CO_2e/MMBtu
PE1 GHG = 612,850 lb-CO_2e/year

N-2253-2-7 SIDE SEAM STRIPE SPRAY OPERATION (LINE #2) SERVED BY ONE SOUDRONIC MODEL FBB BODYMAKER AND ONE 0.6 MMBTU/HR FLYNN AERO FLAME AF-9 CURING TUNNEL. THE FUME HOOD (OVER THE COATING APPLICATOR AND CONVEYOR) AND CURING TUNNEL IS VENTED TO THE SHARED THERMAL OXIDIZER

This unit is equipped with a 0.6 MMBtu/hr curing tunnel oven fired on natural gas. Natural gas usage for the oven is not limited. An emission factor of 116.6 lb-CO_2e/MMBtu will be used to determine the annual GHG emissions.

PE1 GHG = 0.6 MMBtu/hr x 8760 hr/year x 116.6 lb-CO_2e/MMBtu
PE1 GHG = 612,850 lb-CO_2e/year

N-2253-3-7 SIDE SEAM STRIPE SPRAY OPERATION (LINE #3) SERVED BY ONE SOUDRONIC MODEL FBB BODYMAKER AND ONE 0.6 MMBTU/HR FLYNN AERO FLAME AF-9 CURING TUNNEL. THE FUME HOOD (OVER THE COATING APPLICATOR AND CONVEYOR) AND CURING TUNNEL IS VENTED TO THE SHARED THERMAL OXIDIZER

This unit is equipped with a 0.6 MMBtu/hr curing tunnel oven fired on natural gas. Natural gas usage for the oven is not limited. An emission factor of 116.6 lb-CO_2e/MMBtu will be used to determine the annual GHG emissions.

PE1 GHG = 0.6 MMBtu/hr x 8760 hr/year x 116.6 lb-CO_2e/MMBtu
PE1 GHG = 612,850 lb-CO_2e/year

N-2253-4-7 SIDE SEAM STRIPE SPRAY OPERATION (LINE #4) SERVED BY ONE ABM 420 BODYMAKER AND ONE 0.6 MMBTU/HR FLYNN AERO FLAME AF-9 CURING TUNNEL. THE FUME HOOD (OVER THE COATING APPLICATOR AND CONVEYOR) AND CURING TUNNEL IS VENTED TO THE SHARED THERMAL OXIDIZER

This unit is equipped with a 0.6 MMBtu/hr curing tunnel oven fired on natural gas. Natural gas usage for the oven is not limited. An emission factor of 116.6 lb-CO_2e/MMBtu will be used to determine the annual GHG emissions.

PE1 GHG = 0.6 MMBtu/hr x 8760 hr/year x 116.6 lb-CO_2e/MMBtu
PE1 GHG = 612,850 lb-CO_2e/year

N-2253-6-7 SIDE SEAM STRIPE SPRAY OPERATION (LINE #6) SERVED BY ONE SBW 270 BODYMAKER AND ONE 0.6 MMBTU/HR FLYNN AERO FLAME AF-9 CURING TUNNEL. THE FUME HOOD (OVER THE COATING APPLICATOR AND CONVEYOR) AND CURING TUNNEL IS VENTED TO THE SHARED THERMAL OXIDIZER

This unit is equipped with a 0.6 MMBtu/hr curing tunnel oven fired on natural gas. Natural gas usage for the oven is not limited. An emission factor of 116.6 lb-CO_2e/MMBtu will be used to determine the annual GHG emissions.

PE1 GHG = 0.6 MMBtu/hr x 8760 hr/year x 116.6 lb-CO_2e/MMBtu
PE1 GHG = 612,850 lb-CO_2e/year

N-2253-7-7 SIDE SEAM STRIPE SPRAY OPERATION (LINE #7) SERVED BY ONE SOUDRONIC MODEL FBB BODYMAKER AND ONE 0.4 MMBTU/HR SARDEE SLIX-3 CURING TUNNEL. THE FUME HOOD (OVER THE COATING APPLICATOR AND CONVEYOR) AND CURING TUNNEL IS VENTED TO THE SHARED THERMAL OXIDIZER

This unit is equipped with a 0.4 MMBtu/hr curing tunnel oven fired on natural gas. Natural gas usage for the oven is not limited. An emission factor of 116.6 lb-CO_2e/MMBtu will be used to determine the annual GHG emissions.

PE1 GHG = 0.4 MMBtu/hr x 8760 hr/year x 116.6 lb-CO_2e/MMBtu
PE1 GHG = 408,566 lb-CO_2e/year

N-2253-8-7 SIDE SEAM STRIPE SPRAY OPERATION (LINE #8) SERVED BY ONE SOUDRONIC MODEL FBB BODYMAKER AND ONE 0.4 MMBTU/HR SARDEE SLIX-3 CURING TUNNEL. THE FUME HOOD (OVER THE COATING APPLICATOR AND CONVEYOR) AND CURING TUNNEL IS VENTED TO THE SHARED THERMAL OXIDIZER

This unit is equipped with a 0.4 MMBtu/hr curing tunnel oven fired on natural gas. Natural gas usage for the oven is not limited. An emission factor of 116.6 lb-CO_2e/MMBtu will be used to determine the annual GHG emissions.

PE1 GHG = 0.4 MMBtu/hr x 8760 hr/year x 116.6 lb-CO_2e/MMBtu
PE1 GHG = 408,566 lb-CO_2e/year

N-2253-9-7 SIDE SEAM STRIPE SPRAY OPERATION (LINE #9) SERVED BY ONE SOUDRONIC MODEL FBB BODYMAKER AND ONE 0.4 MMBTU/HR SARDEE SLIX-3 CURING TUNNEL. THE FUME HOOD (OVER THE COATING APPLICATOR AND CONVEYOR) AND CURING TUNNEL IS VENTED TO THE SHARED THERMAL OXIDIZER

This unit is equipped with a 0.4 MMBtu/hr curing tunnel oven fired on natural gas. Natural gas usage for the oven is not limited. An emission factor of 116.6 lb-CO_2e/MMBtu will be used to determine the annual GHG emissions.

PE1 GHG = 0.4 MMBtu/hr x 8760 hr/year x 116.6 lb-CO_2e/MMBtu
PE1 GHG = 408,566 lb-CO_2e/year

N-2253-15-12 SHEET COATING OPERATION #2 CONSISTING OF A WAGNER MODEL 15X44-A SHEET COATER AND A 7.7 MMBTU/HR YOUNG BROS. KELGRAF OVEN WITH MAXON CYCLOMAX LOW NOX BURNERS. THE COATING APPLICATION EQUIPMENT AND THE OVEN ARE ALL VENTED TO AN 8.0 MMBTU/HR SHARED THERMAL OXIDIZER EQUIPPED WITH A HEAT RECOVERY SYSTEM THAT TRANSFERS THERMAL OXIDIZER EXHAUST INTO THE CURING OVEN

This unit is equipped with a 7.7 MMBtu/hr curing tunnel oven fired on natural gas. Natural gas usage for the oven is not limited. An emission factor of 116.6 lb-CO_2e/MMBtu will be used to determine the annual GHG emissions.

PE1 GHG = 7.7 MMBtu/hr x 8760 hr/year x 116.6 lb-CO_2e/MMBtu
PE1 GHG = 7,864,903 lb-CO_2e/year

N-2253-16-12 SHEET COATING OPERATION #2 CONSISTING OF A WAGNER MODEL 15X44-A SHEET COATER AND A 9.4 MMBTU/HR YOUNG BROS. KELGRAF OVEN WITH MAXON CYCLOMAX LOW NOX BURNERS. THE COATING APPLICATION EQUIPMENT AND THE OVEN ARE ALL VENTED TO AN 8.0 MMBTU/HR SHARED THERMAL OXIDIZER EQUIPPED WITH A HEAT RECOVERY SYSTEM THAT TRANSFERS THERMAL OXIDIZER EXHAUST INTO THE CURING OVEN

This unit is equipped with a 9.4 MMBtu/hr curing tunnel oven fired on natural gas. Natural gas usage for the oven is not limited. An emission factor of 116.6 lb-CO_2e/MMBtu will be used to determine the annual GHG emissions.

PE1 GHG = 9.4 MMBtu/hr x 8760 hr/year x 116.6 lb-CO_2e/MMBtu
PE1 GHG = 9,601,310 lb-CO_2e/year

N-2253-17-12 SHEET COATING OPERATION #4 CONSISTING OF A WAGNER MODEL 15X44-A SHEET COATER AND A 7.3 MMBTU/HR YOUNG BROS. KELGRAF OVEN WITH MAXON CYCLOMAX LOW NOX BURNERS. THE COATING APPLICATION EQUIPMENT AND THE OVEN ARE ALL VENTED TO AN 8.0 MMBTU/HR SHARED THERMAL OXIDIZER EQUIPPED WITH A HEAT RECOVERY SYSTEM THAT TRANSFERS THERMAL OXIDIZER EXHAUST INTO THE CURING OVEN

This unit is equipped with a 7.3 MMBtu/hr curing tunnel oven fired on natural gas. Natural gas usage for the oven is not limited. An emission factor of 116.6 lb-CO_2e/MMBtu will be used to determine the annual GHG emissions.

PE1 GHG = 7.3 MMBtu/hr x 8760 hr/year x 116.6 lb-CO_2e/MMBtu
PE1 GHG = 7,456,337 lb-CO_2e/year

N-2253-18-8 UV TYPE SHEET COATING OPERATION #1 CONSISTING OF A CRABTREE MODEL 13X45-F1 SHEET COATER. THE SHARED OVEN FROM PERMIT UNITS N-2253-15, N-2253-16, AND N-2253-17 MAY SERVE THE PRODUCTS MANUFACTURED FROM THIS PERMIT UNIT

Emissions from the shared curing ovens have already been calculated. Therefore, PE1 GHG is equal to zero for this unit.

N-2253-19-4 COATING STORAGE TANK #1 CONSISTING OF ONE 8,000 GALLON ABOVEGROUND VERTICAL FIXED ROOF STORAGE TANK

There are no GHG emissions from this unit.

N-2253-20-4 COATING STORAGE TANK #2 CONSISTING OF ONE 8,000 GALLON ABOVEGROUND VERTICAL FIXED ROOF STORAGE TANK

There are no GHG emissions from this unit.

N-2253-21-3 SIDE SEAM STRIPE SPRAY OPERATION (LINE #10) SERVED BY ONE SOUDRONIC MODEL AFB 1075 BODYMAKER AND ONE 0.6 MMBTU/HR SOUDRONIC MODEL LSC-12 CURING TUNNEL. THE FUME HOOD (OVER THE COATING APPLICATOR AND CONVEYOR) AND CURING TUNNEL ARE SERVED BY THE SHARED THERMAL OXIDIZER

This unit is equipped with a 0.6 MMBtu/hr curing tunnel oven fired on natural gas. Natural gas usage for the oven is not limited. An emission factor of 116.6 lb-CO_2e/MMBtu will be used to determine the annual GHG emissions.

PE1 GHG = 0.6 MMBtu/hr x 8760 hr/year x 116.6 lb-CO_2e/MMBtu
PE1 GHG = 612,850 lb-CO_2e/year

N-2253-22-1 SIDE SEAM STRIPE SPRAY OPERATION (LINE #5) SERVED BY ONE SOUDRONIC MODEL AFB-860 BODYMAKER AND ONE 0.4 MMBTU/HR SOUDRONIC MODEL USC-15 CURING TUNNEL. A FUME HOOD OVER THE COATING APPLICATOR, CONVEYOR, AND CURING TUNNEL ARE VENTED TO THE SHARED 8.0 MMBTU/HR SMITH THERMAL OXIDIZER

This unit is equipped with a 0.4 MMBtu/hr curing tunnel oven fired on natural gas. Natural gas usage for the oven is not limited. An emission factor of 116.6 lb-CO_2e/MMBtu will be used to determine the annual GHG emissions.

PE1 GHG = 0.4 MMBtu/hr x 8760 hr/year x 116.6 lb-CO_2e/MMBtu
PE1 GHG = 408,566 lb-CO_2e/year

N-2253-23-0 240 BHP CUMMINS MODEL 6CTA8.3-F1 DIESEL-FUELED EMERGENCY STANDBY INTERNAL COMBUSTION ENGINE POWERING A FIREWATER PUMP

The engine is allowed to operate up to 100 hours per year for maintenance and testing. A GHG emission factor of 1.178 lb-CO_2e/bhp-hr will be used, based on the District's TV applicability calculator.

PE1 GHG = 240 BHP x 100 hr/year x 1.178 lb-CO_2e/bhp-hr
PE1 GHG = 28,272 lb-CO_2e/year

In addition to the above units, many of the units share an 8.0 MMBtu/hr natural gas-fired Thermal Oxidizer An emission factor of 116.6 lb-CO_2e/MMBtu will be used to determine the annual GHG emissions from the shared thermal oxidizer.

PE1 GHG = 8.0 MMBtu/hr x 8760 hr/year x 116.6 lb-CO_2e/MMBtu
PE1 GHG = 8,171,328 lb-CO_2e/year

The following table shows the SSPE1 for GHG emissions from this facility:

Stationary Source Post-Project GHG Potential to Emit	
Permit	**CO_2e (lb/year)**
N-2253-1-7	612,850
N-2253-2-7	612,850
N-2253-3-7	612,850
N-2253-4-7	612,850
N-2253-6-7	612,850
N-2253-7-7	408,566
N-2253-8-7	408,566
N-2253-9-7	408,566
N-2253-21-3	612,850
N-2253-22-1	408,566
N-2253-15-12	7,864,903
N-2253-16-12	9,601,310
N-2253-17-12	7,456,337
N-2253-18-7	0
Shared Thermal Oxidizer	8,171,328
N-2253-19-4	0
N-2253-20-4	0
N-2253-23-0	28,272
SSPE2 (lb/year)	**38,433,514**
SSPE2 (tons/year)	**19,217**

2. PE2 Calculations for GHG's from Modified Units

Only units N-2253-15, '-16, and '-17 will be modified.

N-2253-15-13 SHEET COATING OPERATION #2 CONSISTING OF A WAGNER MODEL 15X44-A SHEET COATER AND A 4.9 MMBTU/HR YOUNG BROS. KELGRAF OVEN WITH MAXON CYCLOMAX LOW NOX BURNERS. THE COATING APPLICATION EQUIPMENT AND THE OVEN ARE ALL VENTED TO AN 8.0 MMBTU/HR SHARED THERMAL OXIDIZER EQUIPPED WITH A HEAT RECOVERY SYSTEM THAT TRANSFERS THERMAL OXIDIZER EXHAUST INTO THE CURING OVEN

This unit is equipped with a 4.9 MMBtu/hr curing tunnel oven fired on natural gas. Natural gas usage for the oven is not limited. An emission factor of 116.6 lb-CO_2e/MMBtu will be used to determine the annual GHG emissions.

PE2 GHG = 4.9 MMBtu/hr x 8760 hr/year x 116.6 lb-CO_2e/MMBtu
PE2 GHG = 5,004,938 lb-CO_2e/year

N-2253-16-13 SHEET COATING OPERATION #2 CONSISTING OF A WAGNER MODEL 15X44-A SHEET COATER AND A 4.9 MMBTU/HR YOUNG BROS. KELGRAF OVEN WITH MAXON CYCLOMAX LOW NOX BURNERS. THE COATING APPLICATION EQUIPMENT AND THE OVEN ARE ALL VENTED TO AN 8.0 MMBTU/HR SHARED THERMAL OXIDIZER EQUIPPED WITH A HEAT RECOVERY SYSTEM THAT TRANSFERS THERMAL OXIDIZER EXHAUST INTO THE CURING OVEN

This unit is equipped with a 4.9 MMBtu/hr curing tunnel oven fired on natural gas. Natural gas usage for the oven is not limited. An emission factor of 116.6 lb-CO_2e/MMBtu will be used to determine the annual GHG emissions.

PE2 GHG = 4.9 MMBtu/hr x 8760 hr/year x 116.6 lb-CO_2e/MMBtu
PE2 GHG = 5,004,938 lb-CO_2e/year

N-2253-17-12 SHEET COATING OPERATION #4 CONSISTING OF A WAGNER MODEL 15X44-A SHEET COATER AND A 4.9 MMBTU/HR YOUNG BROS. KELGRAF OVEN WITH MAXON CYCLOMAX LOW NOX BURNERS. THE COATING APPLICATION EQUIPMENT AND THE OVEN ARE ALL VENTED TO AN 8.0 MMBTU/HR SHARED THERMAL OXIDIZER EQUIPPED WITH A HEAT RECOVERY SYSTEM THAT TRANSFERS THERMAL OXIDIZER EXHAUST INTO THE CURING OVEN

This unit is equipped with a 4.9 MMBtu/hr curing tunnel oven fired on natural gas. Natural gas usage for the oven is not limited. An emission factor of 116.6 lb-CO_2e/MMBtu will be used to determine the annual GHG emissions.

PE2 GHG = 4.9 MMBtu/hr x 8760 hr/year x 116.6 lb-CO_2e/MMBtu
PE2 GHG = 5,004,938 lb-CO_2e/year

In addition to the above units, many of the units share an 8.0 MMBtu/hr natural gas-fired Thermal Oxidizer An emission factor of 116.6 lb-CO_2e/MMBtu will be used to determine the annual GHG emissions from the shared thermal oxidizer.

PE1 GHG = 8.0 MMBtu/hr x 8760 hr/year x 116.6 lb-CO_2e/MMBtu
PE1 GHG = 8,171,328 lb-CO_2e/year

Modified Units Post-Project GHG Potential to Emit	
Permit	**CO_2e (lb/year)**
N-2253-15-12	5,004,938
N-2253-16-12	5,004,938
N-2253-17-12	5,004,938
Shared Thermal Oxidizer	8,171,328
SSPE2 (lb/year)	**23,186,143**
SSPE2 (tons/year)	**11,593**

San Joaquin Valley
Unified Air Pollution Control District

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

[ ] SIGNIFICANT PERMIT MODIFICATION
[ ] MINOR PERMIT MODIFICATION
[X] ADMINISTRATIVE AMENDMENT

COMPANY NAME: **Ball Metal Food Container Corp., LLC**	FACILITY ID: N – **2253**
1. Type of Organization: [X] Corporation [ ] Sole Ownership [ ] Government [ ] Partnership [ ] Utility	
2. Owner's Name: **Ball Corporation**	
3. Agent to the Owner:	

II. COMPLIANCE CERTIFICATION (Read each statement carefully and initial all circles for confirmation):

(TC) Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).

(TC) Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.

(TC) Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.

(TC) Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:

Tim Case — Signature of Responsible Official

10/15/2012 — Date

Tim Case

Name of Responsible Official (please print)

Manager EHS

Title of Responsible Official (please print)

APPENDIX IV

Title V Compliance Certification Form

APPENDIX V

QNEC Calculations

Quarterly Net Emissions Change (QNEC) Calculations

QNEC = (PE2 – BE) ÷ 4

As shown in Section VII.C.5, BE is equal to PE1 for all pollutants. Therefore, the equation for QNEC reduces to:

QNEC = (PE2 – PE1) ÷ 4

N-2107-15

VOC emissions are covered under an SLC that is not changing; therefore, QNEC for VOC is equal to zero. The following table shows the QNEC for all other pollutants:

Pollutant	PE2 (lb/year)	PE1 (lb/year)	QNEC (lb/qtr)
NOx	1,022	1,606	-146.0
SOx	110	183	-18.25
PM10	329	511	-45.5
CO	6,424	10,111	-921.75

N-2107-16

VOC emissions are covered under an SLC that is not changing; therefore, QNEC for VOC is equal to zero. The following table shows the QNEC for all other pollutants:

Pollutant	PE2 (lb/year)	PE1 (lb/year)	QNEC (lb/qtr)
NOx	1,022	2,008	-246.5
SOx	110	219	-27.25
PM10	329	621	-73.0
CO	6,424	12,337	-1,478.25

N-2107-17

VOC emissions are covered under an SLC that is not changing; therefore, QNEC for VOC is equal to zero. The following table shows the QNEC for all other pollutants:

Pollutant	PE2 (lb/year)	PE1 (lb/year)	QNEC (lb/qtr)
NOx	1,022	1,533	-127.75
SOx	110	183	-18.25
PM10	329	475	-36.5
CO	6,424	9,563	-784.75