

October 21, 2021

Mr. Matt Harris  
Ball Metalpack (Oakdale), LLC  
300 W Greger St  
Oakdale, CA 95361

**Re: Notice of Preliminary Decision – Title V Permit Renewal**  
**Facility Number: N-2253**  
**Project Number: N-1201622**

Dear Mr. Harris:

Enclosed for your review and comment is the District's analysis of the application to renew the Federally Mandated Operating Permit for Ball Metalpack (Oakdale), LLC at 300 W Greger St in Oakdale, California.

The notice of preliminary decision for this project has been posted on the District's website ([www.valleyair.org](http://www.valleyair.org)). After addressing all comments made during the 30-day public notice and the 45-day EPA comment periods, the District intends to issue the renewed Federally Mandated Operating Permit. Please submit your written comments on this project within the 30-day public comment period, as specified in the enclosed public notice.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Errol Villegas, Permit Services Manager, at (559) 230-5900.

Sincerely,



Brian Clements  
Director of Permit Services

Enclosures

cc: Courtney Graham, CARB (w/enclosure) via email  
cc: Laura Yannayon, EPA (w/enclosure) via EPS

**Samir Sheikh**  
Executive Director/Air Pollution Control Officer

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**SAN JOAQUIN VALLEY  
AIR POLLUTION CONTROL DISTRICT**

**Proposed Title V Permit Renewal Evaluation  
Ball Metalpack (Oakdale), LLC  
N-2253**

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# TITLE V PERMIT RENEWAL EVALUATION

## CAN MANUFACTURING

**Engineer:** Mungi Hong  
**Date:** October 20, 2021

**Facility Number:** N-2253  
**Facility Name:** Ball Metalpack (Oakdale), LLC  
**Mailing Address:** 300 W Greger St  
Oakdale, CA 95361

**Contact Name:** Matt Harris  
**Phone:** (209) 848-6541

**Responsible Official:** Matt Harris  
**Title:** Plant Manager

**Project # :** N-1201622  
**Deemed Complete:** June 16, 2020

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### I. PROPOSAL

Ball Metalpack (Oakdale), LLC was issued its last renewed Title V permit on June 20, 2016. As required by District Rule 2520, the applicant has applied to renew their Title V permit. The existing Title V permit shall be reviewed and modified to reflect all applicable District and federal rules updated, removed, or added since the issuance of the previously renewed Title V permit.

In 2016, Ball Metalpack (Oakdale), LLC received three Authorities to Construct (ATCs) for the installation of three new portable powder coating operations (ATCs N-2253-24-0 through '-26-0), and these ATCs have not yet been converted to Permit to Operate (PTOs). Pursuant to the applicant and confirmed by District inspection, these ATCs have already been fully implemented. The installation of the portable powder coating operations triggers a minor modification to Ball Metalpack (Oakdale), LLC's Title V permit. The inclusion of these ATCs into Ball Metalpack (Oakdale), LLC's Title V permit and the processing of the associated Title V permit minor modifications will also be included as a part of this Title V renewal project.

The purpose of this evaluation is to provide the legal and factual basis for all updated applicable requirements and to determine if the facility will comply with these updated requirements. It also specifically identifies all additions, deletions, and/or changes made to permit conditions or equipment descriptions.

## **II. FACILITY LOCATION**

Ball Metalpack (Oakdale), LLC is located at 300 W Greger St in Oakdale, CA.

## **III. EQUIPMENT LISTING**

A detailed facility printout listing all permitted equipment at the facility is included as Attachment C.

## **IV. GENERAL PERMIT TEMPLATE USAGE**

The applicant is requesting to use the following model general permit Templates:

### **A. Template SJV-UM-0-3 Facility Wide Umbrella**

The applicant has requested to utilize template No. SJV-UM-0-3, Facility Wide Umbrella. Based on the information submitted in the Template Qualification Form, the applicant qualifies for the use of this template.

## **V. SCOPE OF EPA AND PUBLIC REVIEW**

Certain segments of the proposed Renewed Operating Permit are based on model general permit templates that have been previously subject to EPA and public review. The terms and conditions from the model general permit templates are included in the proposed permit and are not subject to further EPA and public review.

For permit applications utilizing model general permit templates, public and agency comments on the District's proposed actions are limited to the applicant's eligibility for model general permit template, applicable requirements not covered by the model general permit template, and the applicable procedural requirements for issuance of Title V Operating Permits.

The following permit conditions, including their underlying applicable requirements, originate from model general permit templates and are not subject to further EPA or public review.

Conditions 2 through 41 of the requirements for permit unit N-2253-0-5.

## VI. FEDERALLY ENFORCEABLE REQUIREMENTS

### Rules Addressed by General Permit Template

- District Rule 2010, Permits Required (amended December 17, 1992)
- District Rule 2020, Exemptions (amended December 18, 2014)<sup>1</sup>
- District Rule 2031, Transfer of Permits (amended December 17, 1992)
- District Rule 2070, Standards for Granting Applications, Section 7.0 (amended December 17, 1992)
- District Rule 2080, Conditional Approval (amended December 17, 1992)
- District Rule 2520, Federally Mandated Operating Permits, Sections 5.2, 9.1.1, 9.4, 9.5, 9.7, 9.8, 9.9, 9.13.1, 9.13.2, 9.16, 10.0 (amended June 21, 2001 ⇒ amended August 15, 2019)
- District Rule 4101, Visible Emissions (amended February 17, 2005)
- District Rule 8021, Construction, Demolition Excavation, Extraction, and Other Earthmoving Activities (amended August 19, 2004)
- District Rule 8031, Bulk Materials (amended August 19, 2004)
- District Rule 8041, Carryout and Trackout (amended August 19, 2004)
- District Rule 8051, Open Areas (amended August 19, 2004)
- District Rule 8061, Paved and Unpaved Roads (amended August 19, 2004)
- District Rule 8071, Unpaved Vehicle/Equipment Traffic Areas (amended September 16, 2004)
- 40 CFR Part 61, Subpart M, National Emission Standards for Asbestos (amended July 20, 2004)

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<sup>1</sup> The amendments made to this rule on August 18, 2011 and December 18, 2014 have no impact on this source; therefore, Template SJV-UM-03 is still valid for this project.

## **Rules Not Addressed by General Permit Template**

### **A. Rules Updated or Evaluated**

- District Rule 2201, New and Modified Stationary Source Review Rule (amended February 18, 2016 ⇒ amended August 15, 2019)
- District Rule 2520, Federally Mandated Operating Permits (amended June 21, 2001 ⇒ amended August 15, 2019)
- District Rule 4601, Architectural Coatings (amended December 17, 2009 ⇒ amended April 16, 2020)
- District Rule 4702, Internal Combustion Engines (amended November 14, 2013 ⇒ amended August 19, 2021)
- 40 CFR Part 64, Compliance Assurance Monitoring (amended October 22, 1997)
- 40 CFR Part 68, Chemical Accident Prevention Provisions (April 9, 2004 ⇒ amended December 19, 2019)
- 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners (amended June 25, 2013 ⇒ amended March 24, 2021)
- 40 CFR Part 82, Subpart F, Recycling and Emissions Reduction (June 25, 2013 ⇒ amended April 10, 2020)

### **B. Rules Removed**

There are no applicable rules that were removed since the last Title V renewal.

### **C. Rules Added**

There are no applicable rules that were added since the last Title V renewal.

### **D. Rules Not Updated**

- District Rule 1070, Inspections (amended December 17, 1992)
- District Rule 1081, Source Sampling (amended December 16, 1993)
- District Rule 2410, Prevention of Significant Deterioration (adopted June 16, 2011)

- District Rule 4201, Particulate Matter Concentration (amended December 17, 1992)
- District Rule 4309, Dryers, Dehydrators, and Ovens (adopted December 15, 2005)
- District Rule 4604, Can and Coil Coating Operations (amended September 20, 2007)
- District Rule 4623, Storage of Organic Liquids (amended May 19, 2005)
- District Rule 4701, Internal Combustion Engines – Phase 1 (amended August 21, 2003)
- District Rule 4801, Sulfur Compounds (amended December 17, 1992)

## **VII. REQUIREMENTS NOT FEDERALLY ENFORCEABLE**

For each Title V source, the District issues a single permit that contains the Federally Enforceable requirements, as well as the District-only requirements. The District-only requirements are not a part of the Title V Operating Permits. The terms and conditions that are part of the facility's Title V permit are designated as "Federally Enforceable Through Title V Permit".

For this facility, the following are not federally enforceable and will not be discussed in further detail:

### **Rules Addressed by General Permit Template**

- District Rule 1100, Equipment Breakdown (amended December 17, 1992)
- District Rule 1160, Emission Statements (adopted November 18, 1992)
- District Rule 2040, Applications (amended December 17, 1992)

### **Rules Not Addressed by General Permit Template**

#### **A. Rules Added/Updated**

There are no rules that are not federally enforceable being added or updated at this time.

**B. Rules Not Updated**

**1. District Rule 4102, Nuisance (as amended December 17, 1992)**

The purpose of this rule is to protect the health and safety of the public, and this rule applies to any source operation which emits or may emit air contaminants or other materials. The following conditions are based on this rule:

<b>Permit Unit</b>	<b>Condition #</b>
N-2253-0-5	1
N-2253-16-15	2
N-2253-23-2	2 and 7

However, Condition 7 of permit unit N-2253-23 is also required to demonstrate compliance with District Rules 4701 and 4702, which are Federally Enforceable requirements. Therefore, only the following conditions are not federally enforceable through Title V:

<b>Permit Unit</b>	<b>Condition #</b>
N-2253-0-5	1
N-2253-16-15	2
N-2253-23-2	2

**VIII. PERMIT REQUIREMENTS**

The purpose of this evaluation is to review changes to federally enforceable requirements; therefore, this compliance section will only address rules and permit conditions that have been amended or added since the issuance of the last renewed Title V permit.

**A. District Rule 2201 - New and Modified Stationary Source Review Rule**

District Rule 2201 has been amended since this facility's Title V permit was last issued. However, the requirements of this rule are only triggered when a source installs new equipment and/or undergoes a modification. All applicable requirements from any NSR permit actions have already been incorporated into the current Title V permit, except for the terms from project N-1163263 which are being included as part of this Title V permit renewal (see explanation below).



Project N-1163263 was subject to the NSR Rule and ATCs N-2253-24-0 through '26-0 issued in that project are being incorporated into the Title V permit as part of this Title V Renewal (see Attachment D for a copy of each ATC). As a result, the following NSR terms are being incorporated into the Title V permit within this renewal:

- Conditions #5 through #12 from ATCs N-2253-24-0, which are based on NSR, have been included in the proposed Title V permit N-2253-24-1.
- Conditions #5 through #12 from ATCs N-2253-25-0, which are based on NSR, have been included in the proposed Title V permit N-2253-25-1.
- Conditions #5 through #12 from ATCs N-2253-26-0, which are based on NSR, have been included in the proposed Title V permit N-2253-26-1.

#### **B. District Rule 2520 - Federally Mandated Operating Permits**

District Rule 2520 has been amended since this facility's Title V permit was last renewed. The amendments to this rule were administrative, relating only to the notification procedures for Title V permit modifications that are required to go through a public notice. The amendments to this rule did not have any effect on current permit requirements and will therefore not be addressed further in this evaluation. However, greenhouse gas emissions will be addressed under Rule 2520 during this renewal.

##### Greenhouse Gas Discussion

There are no federally applicable Greenhouse Gas (GHG) requirements for this source. It should be noted that the Mandatory Greenhouse Gas Reporting rule (40 CFR Part 98) is not included in the definition of an applicable requirement within Title V (per 40 CFR 71.2). Therefore, there will be no further discussion of GHG in this evaluation.

#### **C. District Rule 4601 – Architectural Coatings**

District Rule 4601 was amended on April 16, 2020. However, the amended rule is not SIP-approved by EPA. The previous version of this rule (amended December 17, 2009) is SIP-approved and is addressed by the District's facility-wide umbrella template. Therefore, template SJV-UM-0-3 is still valid for this project.

#### **D. District Rule 4702 – Internal Combustion Engines**

District Rule 4702 was amended on August 19, 2021. However, the amended rule is not SIP-approved by EPA. The previous version of this rule (amended November 14, 2013) is SIP-approved and was addressed by the District's

previous permit renewal (N-1150950). Therefore, changes to the rule do not affect the current permit.

**E. District Rule 8071 – Unpaved Vehicle/Equipment Traffic Areas**

The purpose of this rule is to limit fugitive dust emissions from the outdoor handling, storage, and transport of bulk materials. This rule applies to the outdoor handling, storage, and transport of any bulk material.

During this Title V renewal project, the District found that condition 36 of PTO N-2253-0-4 is redundant to condition 35 of PTO N-2253-0-4; therefore, condition 36, as seen below, has been removed in the proposed PTO N-2253-0-5.

On each day that 50 or more vehicle daily trips, or 25 or more vehicle daily trips with 3 or more axles, originates from within and remains exclusively within an unpaved vehicle/equipment traffic area, the owner/operator may apply/reapply water to limit VDE to 20% opacity. The owner/operator shall restrict access and periodically stabilize a disturbed surface area whenever a site becomes inactive to comply with the conditions for a stabilized surface as defined in Rule 8011, unless specifically exempted under Section 4.0 of Rule 8071 (9/16/04) or Rule 8011 (8/19/04). [District Rules 8071 and Rule 8011]

**F. 40 CFR Part 64 – Compliance Assurance Monitoring (CAM)**

40 CFR Part 64 requires Compliance Assurance Monitoring for units that meet the following three criteria:

- 1) the unit must have an emission limit for the pollutant;
- 2) the unit must have add-on controls for the pollutant; these are devices such as flue gas recirculation (FGR), baghouses, and catalytic oxidizers; and
- 3) the unit must have a pre-control potential to emit of greater than the major source thresholds.

<b>Pollutant</b>	<b>Major Source Threshold (lb/year)</b>
NO <sub>x</sub>	20,000
SO <sub>x</sub>	140,000
PM <sub>10</sub>	140,000
CO	200,000
VOC	20,000

a. N-2253-1, '-2, '-3, '-4, '-6, '-7, '-8, '-9, and '-21: SIDE SEAM STRIPE SPRAY OPERATION SERVED BY A BODYMAKER AND A CURING TUNNEL. THE FUME HOOD (OVER THE COATING APPLICATOR AND CONVEYOR) AND CURTING TUNNEL IS VENTED TO THE SHARED THERMAL OXIDIZER

- 1) These permit units contain an emissions limit for NO<sub>x</sub>, SO<sub>x</sub>, PM<sub>10</sub>, CO, and VOC.
- 2) These permit units do not have any add-on controls for NO<sub>x</sub>, SO<sub>x</sub>, PM<sub>10</sub>, or CO emissions; therefore, these are not subject to CAM requirements for NO<sub>x</sub>, SO<sub>x</sub>, PM<sub>10</sub>, or CO.

Each permit shares an add-on control (thermal oxidizer) for VOC emissions; therefore, these are subject to CAM requirements for VOC emissions.

- 3) Permits N-2253-1, '-2, '-3, '-4, '-6, '-7, '-8, '-9, and '-21 have a combined annual VOC emissions limit of 58,579 lb-VOC/year. However, to be conservative, it will be assumed that each permit has the ability to emit the combined annual VOC emissions limit. Therefore, the post-control potential to emit (PE) for VOC for each unit can be calculated as follows:

$$\begin{aligned} \text{Post-control PE} &= \text{Combined Annual VOC Emissions Limit (lb/year)} \\ &= 58,579 \text{ lb-VOC/year} \end{aligned}$$

Since the post-control PE for each unit is already greater than the major source threshold of 20,000 lb-VOC/year, no further calculation is required, and each unit is subject to CAM for VOC emissions.

b. N-2253-15, '-16, and '-17: SHEET COATING OPERATION CONSISTING OF A SHEET COATER AND AN OVEN WITH LOW NOX BURNERS. THE COATING APPLICATION EQUIPMENT AND THE OVEN ARE VENTED TO THE SHARED THERMAL OXIDIZER

- 1) These permit units contain an emissions limit for NO<sub>x</sub>, SO<sub>x</sub>, PM<sub>10</sub>, CO, and VOC emissions.
- 2) These permit units do not have any add-on controls for NO<sub>x</sub>, SO<sub>x</sub>, PM<sub>10</sub>, or CO emissions; therefore, these are not subject to CAM requirements for NO<sub>x</sub>, SO<sub>x</sub>, PM<sub>10</sub>, or CO.

Each permit shares an add-on control (thermal oxidizer) for VOC emissions; therefore, these are subject to CAM requirements for VOC emissions.

- 3) Permits N-2253-15, '-16, and '-17 have a combined annual VOC emissions limit of 40,521 lb-VOC/year. However, each unit has a daily VOC emissions limit of 36.7 lb-VOC/day. Therefore, the post-control PE for VOC for each unit can be calculated as follows:

$$\begin{aligned}\text{Post-control PE} &= \text{Daily VOC Emissions Limit (lb/day)} \times 365 \text{ day/year} \\ &= 36.7 \text{ lb-VOC/day} \times 365 \text{ day/year} \\ &= 13,396 \text{ lb-VOC/year}\end{aligned}$$

Based on the current PTOs, to be conservative, it will be assumed that the VOC control efficiency (CE) of the thermal oxidizer is 98.5%.

$$\begin{aligned}\text{Pre-control PE} &= \text{Post-control PE (lb/year)} \div (1 - \text{CE}) \\ &= 13,396 \text{ lb-VOC/year} \div (1 - 0.985) \\ &= 893,067 \text{ lb-VOC/year}\end{aligned}$$

Since the pre-control PE for each unit is greater than the major source threshold of 20,000 lb-VOC/year, each unit is subject to CAM for VOC emissions.

- c. N-2253-18: UV TYPE SHEET COATING OPERATION CONSISTING OF A SHEET COATER. AN OVEN FROM PERMIT N-2253-15, N-2253-16, OR N-2253-17 MAY SERVE THE PRODUCTS MANUFACTURED FROM THIS PERMIT
- 1) This permit unit contains an emissions limit for VOC emissions only.
  - 2) This permit unit does not have any add-on controls; therefore, this is not subject to CAM requirements.
- d. N-2253-19 AND '-20: COATING STORAGE TANK CONSISTING OF ONE 8,000 GALLON ABOVEGROUND VERTICAL FIXED ROOF STORAGE TANK
- 1) These permit units contain an emissions limit for VOC emissions only.
  - 2) These permit units do not have any add-on controls; therefore, these are not subject to CAM requirements.
- e. N-2253-23: 240 BHP DIESEL-FIRED EMERGENCY STANDBY INTERNAL COMBUSTION ENGINE POWERING A FIREWATER PUMP
- 1) This permit unit contains an emissions limit for NO<sub>x</sub>, SO<sub>x</sub>, PM<sub>10</sub>, CO, and VOC emissions.

2) This permit unit does not have any add-on controls; therefore, this is not subject to CAM requirements.

f. N-2253-24 through '-26: PORTABLE POWDER COATING OPERATION

1) These permit units contain an emissions limit for PM<sub>10</sub> emissions only.

2) These permit units do not have any add-on controls; therefore, these are not subject to CAM requirements.

As seen above, permits '-1 through '-9, '-15 through '-17, and '-21 are subject to CAM requirements and will be discussed below.

#### §64.3 - Monitoring Design Criteria

This section specifies the design criteria for the CAM system. Paragraph (a) (*General criteria*) requires that the CAM system be designed to obtain data for one or more appropriate indicators of emission control system performance and requires the owner to establish appropriate ranges or designated conditions for the selected indicators such that operation within the ranges provides a reasonable assurance of ongoing compliance with emission limitations or standards for the anticipated range of operating conditions.

Paragraph (b) (*Performance criteria*) requires the owner or operator to establish and maintain the following:

- Specifications to ensure that representative data are collected.
- Verification procedures for startup of new monitoring equipment.
- Quality assurance and control practices to ensure continuing validity of data.
- Data collection frequency and procedures.

Paragraph (c) (*Evaluation factors*) requires the owner or operator to take into account site-specific factors in the design of the CAM system.

Paragraph (d) (*Special criteria for the use of continuous emission, opacity, or predictive monitoring systems*) requires the owner or operator to use a continuous emission monitoring system (CEMS), continuous opacity monitoring system (COMS), or a predictive emission monitoring system (PEMS) to satisfy CAM requirements, provided that these monitoring systems are required pursuant to other authority under the Clean Air Act or state or local law. This subsection also stipulates the following:

- The use of a CEMS, COMS, or PEMS that satisfies any of the following monitoring requirements shall be deemed to satisfy the general design criteria in paragraphs (a) and (b) of this section, provided that a COMS may be subject to the criteria for establishing indicator ranges under paragraph (a) of this section:
  - (i) Section 51.214 and appendix P of 40 CFR 51;
  - (ii) Section 60.13 and appendix B of 40 CFR 60;
  - (iii) Section 63.8 and any applicable performance specifications required pursuant to the applicable subpart of 40 CFR 63;
  - (iv) 40 CFR 75;
  - (v) Subpart H and appendix IX of 40 CFR 266; or
  - (vi) In the event that the monitoring system is not subject to any of the requirements listed above, comparable requirements and specifications established by the permitting authority.
  
- The owner or operator shall design the monitoring system subject to this paragraph (d) to:
  - (i) Allow for reporting of exceedances (or excursions if applicable to a COMS used to assure compliance with a particulate matter standard), consistent with any period for reporting of exceedances in an underlying requirement. If an underlying requirement does not contain a provision for establishing an averaging period for the reporting of exceedances or excursions, the criteria used to develop an averaging period specified in the data collection procedures required under paragraph (b) of this section shall apply; and
  
  - (ii) Provide an indicator range consistent with paragraph (a) of this section for a COMS used to assure compliance with a particulate matter standard. If an opacity standard applies to the pollutant-specific emissions unit, such limit may be used as the appropriate indicator range unless the opacity limit fails to meet the criteria in paragraph (a) of this section after considering the type of control device and other site-specific factors applicable to the pollutant-specific emissions unit.

#### §64.4 - Submittal Requirements

This section specifies submittal requirements for the owner or operator which ensure the CAM system will comply with the design criteria of §64.3.

#### §64.5 - Deadlines for Submittals

This section specifies required timing for submittals required under §64.4.

*Large pollutant-specific emissions units* (those with controlled emissions exceeding major source thresholds) are required to make the submittals as a part of the initial Title V permit application where the application has either not been filed or has not been deemed complete. Where the initial Title V permit has been issued without implementation of 40 CFR 64, the owner or operator must make the required submittals as a part of a subsequent application for any significant permit revision. If the required information is not submitted by either of these deadlines, it must be submitted as a part of the application for the Title V permit renewal.

For *other pollutant-specific emissions units*, the required submittal deadline is the application for Title V permit renewal.

#### §64.6 - Approval of monitoring

This section stipulates the following:

- A requirement that the permitting authority act to approve the proposed monitoring by confirming that the monitoring submitted complies with the requirements of §64.3
- An allowance for the permitting authority to condition the approval based on collecting additional data on the indicators to be monitored, including performance or compliance testing
- The minimum conditions that must be placed on the permit in the event that the proposed monitoring is approved by the permitting authority including a milestone schedule for completion of any conditional approval actions required by the owner or operator, such as installations, testing, or verification of operational status
- Actions required by the permitting authority in the event that the proposed monitoring is not approved

The CAM submittal requirements and stipulations for approval of such submittals pursuant to §64.4, §64.5, and §64.6 have been completed in conjunction with the application and review process for this renewal of the Title V permit.

#### §64.7 - Operation of Approved Monitoring

This section stipulates the following:

- Requirements that the owner or operator 1) commence the monitoring upon receipt of a Title V permit that includes such monitoring, 2) properly maintain the monitoring system, and 3) conduct all monitoring in a continuous mode with the exception of outage periods associated with monitor malfunction and repair and with quality assurance and control activities
- Actions required by the owner or operator in response to excursions or exceedances
- A requirement for the owner or operator to document any need for improved monitoring based upon either an identification of a failure of the monitoring system to identify an excursion or exceedance or upon the results of compliance or performance testing that identifies a need to modify the monitoring

#### §64.8 - Quality Improvement Plan (QIP) Requirements

This section stipulates that the Administrator or the permitting authority may require that the facility develop and implement a QIP in the event of a determination of a need for improved monitoring pursuant to §64.7. §64.8 also identifies the minimum elements required in the QIP, and requires that the facility implement the QIP as expeditiously as possible, with implementation not exceeding 180 days after the date that the need for implementation was identified unless the permitting authority is notified.

#### §64.9 - Reporting and Recordkeeping Requirements

This section stipulates the minimum reporting and recordkeeping requirements for facilities subject to 40 CFR 64.

#### §64.10 - Savings Provisions

This section states that the purpose of 40 CFR 64 is to require, as a part of the issuance of a Title V permit, improved or new monitoring at those emissions units where monitoring requirements do not exist or are inadequate to meet the requirements of 40 CFR 64. In addition, §64.10 states that nothing in 40 CFR 64 shall excuse an owner or operator from any other requirements of federal, state or local law or restrict or abrogate the authority of the Administrator or of the permitting authority.



For the permits subject to CAM requirements, the facility had proposed to comply with CAM by continuously monitoring the combustion temperature of the thermal oxidizer to ensure that a minimum combustion chamber of 1,490 °F is maintained; keeping records of the date, time period, and reason that the thermal oxidizer is out of service; and recording the VOC content of all coating and solvents.

There have been no changes to permits ‘-1 through ‘-9, ‘-15 through ‘-17, and ‘-21 since the last Title V permit renewal, and the facility has not proposed any changes to any units under this Title V permit renewal; therefore, compliance is expected to continue.

The following conditions on the draft renewed permits are a mechanism to ensure compliance with the requirements of this subpart:

Permit	Condition #
N-2253-1-9, ‘-2-9, ‘-3-9, ‘-4-9, ‘-6-9, ‘-7-9, ‘-8-9, ‘-9-9 and ‘-21-5	6, 35 and 36
N-2253-15-15 and ‘-17-15	4, 5, 9, 12 and 37
N-2253-16-15	5, 6, 10, 13 and 38

**G. 40 CFR Part 68 – Chemical Accident Prevention Provisions**

This part sets forth the list of regulated substances and thresholds, the petition process for adding or deleting substances to the list of regulated substances, the requirements for owners or operators of stationary sources concerning the prevention of accidental releases, and the State accidental release prevention programs approved under section 112(r). The list of substances, threshold quantities, and accident prevention regulations promulgated under this part do not limit in any way the general duty provisions under section 112(r)(1). The amendments to this subpart do not have any effect on current permit requirements and will therefore not be addressed further in this evaluation.

The following condition on the draft renewed permit is a mechanism to ensure compliance with the requirements of this subpart:

Permit	Condition #
N-2253-0-5	42

**H. 40 CFR Part 82, Subpart B – Servicing of Motor Vehicle Air Conditioners**

The purpose of 40 CFR Part 82 Subpart B is to implement section 609 of the Clean Air Act, as amended regarding the servicing of motor vehicle air conditioners (MVACs), and to implement section 608 of the Act regarding

certain servicing, maintenance, repair disposal of air conditioners in MVACs and MVAC-like appliances.

These regulations apply to any person performing service on a motor vehicle for consideration when this service involves the refrigerant in the motor vehicle air conditioner.

The amendments to this subpart do not have any effect on current permit requirements and will therefore not be addressed further in this evaluation.

The following condition on the draft renewed permit is a mechanism to ensure compliance with the requirements of this subpart:

Permit	Condition #
N-2253-0-5	29

**I. 40 CFR Part 82, Subpart F – Recycling and Emissions Reduction**

The purpose of this subpart is to reduce emissions of class I and class II refrigerants and their non-exempt substitutes to the lowest achievable level by maximizing the recapture and recycling of such refrigerants during the maintenance, service, repair, and disposal of appliances and restricting the sale of refrigerants consisting in whole or in part of a class I or class II ozone-depleting substance or their non-exempt substitutes in accordance with Title VI of the Clean Air Act.

This subpart applies to any person maintaining, servicing, or repairing appliances containing class I, class II or non-exempt substitute refrigerants. This subpart also applies to persons disposing of such appliances (including small appliances and motor vehicle air conditioners), refrigerant reclaimers, technician certifying programs, appliance owners and operators, manufacturers of appliances, manufacturers of recovery and/or recycling equipment, approved recovery and/or recycling equipment testing organizations, and persons buying, selling, or offering to sell class I, class II, or non-exempt substitute refrigerants.

The amendments to this subpart do not have any effect on current permit requirements and will therefore not be addressed further in this evaluation.

The following condition on the draft renewed permit is a mechanism to ensure compliance with the requirements of this subpart:

Permit	Condition #
N-2253-0-5	28

## **IX. PERMIT SHIELD**

A permit shield legally protects a facility from enforcement of the shielded regulations when a source is in compliance with the terms and conditions of the Title V permit. Compliance with the terms and conditions of the Operating Permit is considered compliance with all applicable requirements upon which those conditions are based, including those that have been subsumed.

### **A. Requirements Addressed by Model General Permit Templates**

#### **1. Model General Permit Template SJV-UM-0-3**

By submitting Model General Permit Template SJV-UM-0-3 qualification form, the applicant has requested that a permit shield be granted for all the applicable requirements identified by the template. Therefore, the permit shields as granted in Model General Permit Template is included as conditions 40 and 41 of the facility-wide requirements (N-2253-0-5).

### **B. Requirements not Addressed by Model General Permit Templates**

The applicant has not requested any permit shields other than as discussed above.

### **C. Obsolete Permit Shields From Existing Permit Requirements**

There were no obsolete permit shields listed in the existing permit requirements.

## **X. CALIFORNIA ENVIRONMENTAL QUALITY ACT**

The purpose of the Title V permit renewal is to update the permit to ensure that any changes to regulations since the issuance of the initial Title V permit or most recent renewal of the Title V permit is incorporated as permit requirements.

Per the California Environmental Quality Act (CEQA) Statute §21080.24, and CEQA Guidelines §15281, the issuance, modification, amendment, or renewal of any permit by an air pollution control district or air quality management district pursuant to Title V is exempt from CEQA, unless the issuance, modification, amendment, or renewal authorizes a physical or operational change to a source or facility. There will be no physical or operational change to the source or facility nor will the Title V permit renewal authorize a physical or operational change to the source or facility. Therefore, this project, a Title V permit renewal, is subject to a ministerial action that is exempt from CEQA.

## **XI. PERMIT CONDITIONS**

See Attachment A - Draft Renewed Title V Operating Permit

## **ATTACHMENTS**

- A. Draft Renewed Title V Operating Permit
- B. Previous Title V Operating Permit
- C. Detailed Summary List of Facility Permits
- D. Authorities to Construct N-2253-24-0 through '-26-0

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# ATTACHMENT A

Draft Renewed Title V Operating Permit

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# San Joaquin Valley Air Pollution Control District

FACILITY: N-2253-0-5

EXPIRATION DATE: 10/31/2020

## FACILITY-WIDE REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1; Stanislaus County Rule 110] Federally Enforceable Through Title V Permit
3. The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0; Stanislaus County Rule 110] Federally Enforceable Through Title V Permit
4. {4364} The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0] Federally Enforceable Through Title V Permit
5. {4365} Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (12/20/07). [District Rule 2010, 3.0 and 4.0; and 2020] Federally Enforceable Through Title V Permit
6. {4366} The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 7.0; 2080; and 2520, 9.8.1 and 9.13.1] Federally Enforceable Through Title V Permit
7. {4367} A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District. [District Rule 2031] Federally Enforceable Through Title V Permit
8. Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District. [District Rule 2040]
9. {4369} The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate. Any amendments to these Facility-wide Requirements that affect specific Permit Units may constitute modification of those Permit Units.

Facility Name: BALL METALPACK (OAKDALE), LLC  
Location: 300 W GREGER ST, OAKDALE, CA 95361-8613  
N-2253-0-5 - Oct 11 2021 9:50AM -- HONGM

10. {4370} The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
11. {4371} The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.5.1] Federally Enforceable Through Title V Permit
12. {4372} Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520 (6/21/01). [District Rules 2520, 9.5.2 and 1100, 7.0] Federally Enforceable Through Title V Permit
13. {4373} If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.7] Federally Enforceable Through Title V Permit
14. {4374} It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520, 9.8.2] Federally Enforceable Through Title V Permit
15. {4375} The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.8.3] Federally Enforceable Through Title V Permit
16. {4376} The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.8.4] Federally Enforceable Through Title V Permit
17. {4377} The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520, 9.8.5] Federally Enforceable Through Title V Permit
18. {4378} The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.9] Federally Enforceable Through Title V Permit
19. {4379} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520, 9.13.2.1] Federally Enforceable Through Title V Permit
20. {4380} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.13.2.2] Federally Enforceable Through Title V Permit
21. {4381} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520, 9.13.2.3] Federally Enforceable Through Title V Permit
22. {4382} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520, 9.13.2.4] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE  
These terms and conditions are part of the Facility-wide Permit to Operate.

23. {4383} 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 (02/17/05). 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, and County Rules 401 (in all eight counties in the San Joaquin Valley)] Federally Enforceable Through Title V Permit
24. {4384} No person shall manufacture, blend, repackage, supply, sell, solicit or apply any architectural coating with a VOC content in excess of the corresponding limit specified in Table of Standards 1 effective until 12/30/10 or Table of Standards 2 effective on and after 1/1/11 of District Rule 4601 (12/17/09) for use or sale within the District. [District Rule 4601, 5.1] Federally Enforceable Through Title V Permit
25. {4385} All VOC-containing materials subject to Rule 4601 (12/17/09) shall be stored in closed containers when not in use. [District Rule 4601, 5.4] Federally Enforceable Through Title V Permit
26. {4386} The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.3 (12/17/09). [District Rule 4601, 6.1 and 6.3] Federally Enforceable Through Title V Permit
27. {4387} With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.13.1 and 10.0] Federally Enforceable Through Title V Permit
28. {4388} If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR Part 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit
29. {4389} If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR Part 82, Subpart B. [40 CFR Part 82, Subpart B] Federally Enforceable Through Title V Permit
30. {4390} Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8021] Federally Enforceable Through Title V Permit
31. {4391} Outdoor handling, storage and transport of any bulk material which emits dust shall comply with the requirements of District Rule 8031, unless specifically exempted under Section 4.0 of Rule 8031 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8031] Federally Enforceable Through Title V Permit
32. {4392} An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8041] Federally Enforceable Through Title V Permit
33. {4393} Whenever open areas are disturbed, or vehicles are used in open areas, the facility shall comply with the requirements of Section 5.0 of District Rule 8051, unless specifically exempted under Section 4.0 of Rule 8051 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8051] Federally Enforceable Through Title V Permit
34. {4394} Any paved road or unpaved road shall comply with the requirements of District Rule 8061 unless specifically exempted under Section 4.0 of Rule 8061 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8061] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE  
These terms and conditions are part of the Facility-wide Permit to Operate.



35. {4395} Any unpaved vehicle/equipment area that anticipates more than 50 Average annual daily Trips (AADT) shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 150 vehicle trips per day (VDT) shall comply with the requirements of Section 5.1.2 of District Rule 8071. On each day that 25 or more VDT with 3 or more axles will occur on an unpaved vehicle/equipment traffic area, the owner/operator shall comply with the requirements of Section 5.1.3 of District Rule 8071. On each day when a special event will result in 1,000 or more vehicles that will travel/park on an unpaved area, the owner/operator shall comply with the requirements of Section 5.1.4 of District Rule 8071. All sources shall comply with the requirements of Section 5.0 of District Rule 8071 unless specifically exempted under Section 4.0 of Rule 8071 (9/16/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8071] Federally Enforceable Through Title V Permit
36. {4396} Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation). [40 CFR 61 Subpart M] Federally Enforceable Through Title V Permit
37. {4397} The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit
38. {4398} The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V Permit
39. {4399} When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit
40. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following outdated SIP requirements: Rule 110 (Stanislaus). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
41. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (2/17/05); 4601, sections 5.1, 5.2, 5.3, and 5.8 (12/17/09); 8021 (8/19/04); 8031 (8/19/04); 8041 (8/19/04); 8051 (8/19/04); 8061 (8/19/04); and 8071 (9/16/04). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
42. When applicable to 40 CFR Part 68, a subject facility shall submit to the proper authority a Risk Management Plan when mandated by the regulation. [40 CFR Part 68] Federally Enforceable Through Title V Permit
43. Any person that operates a VOC emission control system subject to the provisions of Section 5.2 of District Rule 4604 (9/20/07) shall submit to the APCO for approval an Operation and Maintenance (O/M) plan. The O/M Plan shall specify actions to be taken to satisfy the requirements of District Rule 4604, Section 5.2 and shall include the following: values or range of acceptable values for key system operating parameter(s); procedures for preventive and corrective maintenance performed; procedures for collecting and recording required data and other information in a form approved by the APCO; burner maintenance schedule; catalyst maintenance and maintenance schedule, if applicable; duct inspection schedule; procedures for revising the O/M Plan; and other information necessary to verify compliance with applicable provisions of Rule 4604. The O/M Plan shall be updated prior to any planned change in operation of the VOC emission control system. [District Rule 4604] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE  
These terms and conditions are part of the Facility-wide Permit to Operate.

44. Stationary source (as defined in 40 CFR 63.2 - Definitions) emissions shall be less than 10 tons per year of each single hazardous air pollutant (HAP) (as defined in 40 CFR 63.2 - Definitions) and less than 25 tons per year for any combination of HAPs. A year, for this condition, is any consecutive 12 month period based on a monthly rolling total. [District Rule 2201] Federally Enforceable Through Title V Permit
45. The owner/operator shall calculate and maintain records on a monthly basis of the quantity of each HAP emitted into the atmosphere from all sources at the facility. The HAP emissions shall be totaled for a rolling consecutive 12-month period. The records shall include an analysis (or other information) sufficiently detailed to allow the District Personal to make a finding about the source's applicability status with regard to the relevant standard or other requirement. [District Rules 2201 and 2520] Federally Enforceable Through Title V Permit
46. The Permittee shall submit a semi annual summary report of HAP emissions report District. This report shall submitted along with semi-annual monitoring report. The report shall contain the following: (i). the monthly individual HAP and total HAP emissions for the previous 17 months and (ii). the totals for the six 12-consecutive month periods of individual HAP and total HAP emissions (i.e., one for each of the months of the reporting period). [District Rule 2520] Federally Enforceable Through Title V Permit
47. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report are based upon December 1 of each year, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days of the end of the reporting period. [District Rule 2520] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-2253-1-9

**EXPIRATION DATE:** 10/31/2020

**EQUIPMENT DESCRIPTION:**

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

## 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 Rule 2201] Federally Enforceable Through Title V Permit
3. The VOC contaminated air stream from the side seam stripe coater, conveyor between the coater and curing tunnel, and curing tunnel shall be vented to the thermal oxidizer at all times except when the thermal oxidizer is undergoing maintenance. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The collection system for fugitive VOC emissions from the side seam stripe coater, conveyor between the coater and curing tunnel, and curing tunnel shall have a minimum overall capture efficiency of 71%. [District Rule 2201] 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 control. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The thermal oxidizer shall be equipped with a continuous temperature monitoring and recording device. [District Rules 2201, 2520 and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
7. The overall VOC capture and control efficiency shall be calculated by multiplying the percent VOC capture efficiency of the collection system by the percent VOC control efficiency of the thermal oxidizer and divide by 100. [District Rules 2201 and 4604] Federally Enforceable Through Title V Permit
8. Three-piece can side seam spray operations shall not use or apply any coating with a VOC content in excess of 660 grams of VOC per liter of coating, as applied, excluding water and exempt compounds. [District Rule 4604] Federally Enforceable Through Title V Permit
9. All solvent cleaning activities shall be performed using solvents with VOC contents not exceeding any of the following limits 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): product cleaning during manufacturing process or surface preparation for coating application: 25 g/l (0.21 lb/gal), repair and maintenance cleaning: 25 g/l (0.21 lb/gal), cleaning of coating application equipment except sheet coater for three-piece cans: 25 g/l (0.21 lb/gal), cleaning of sheet coater for three-piece cans: 550 g/l (4.6 lb/gal) until 9/30/2011 and 250 g/l (2.3 lb/gal) on and after 10/1/2011. [District Rule 4604] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

10. For cleaning of coating application equipment used for sheet coating of three-piece cans, cleaning activities that are performed outside the control of an APCO-approved emission control system that meets the requirements of District Rule 4604 (9/20/07) using solvents with a VOC content greater than 25 g/l (0.21 lb/gallon) shall 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 excessive 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. The discharged solvent from the equipment must be collected into containers without atomizing into the open air. The solvent may be flushed through the system by air or hydraulic pressure, or by pumping. [District Rule 4604] Federally Enforceable Through Title V Permit
11. 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
12. 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
13. 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
14. Only electrostatic, flow, roll, dip, hand application, HVLP, or other application methods with a coating transfer efficiency of at least 65% shall be used. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4604]
15. Coating transfer efficiency shall be measured using a test method pursuant to Section 6.7.4 of Rule 4604 (9/20/07). [District Rule 4604] Federally Enforceable Through Title V Permit
16. The VOC emissions due to coating and solvent usage (from this permit unit) shall not exceed 250 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
17. The PM10 emissions due to coating and solvent usage (from this permit unit) shall not exceed 0.4 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
18. The combined daily VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, and N-2253-21 shall not exceed 250 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
19. The combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, N-2253-21, and N-2253-22 shall not exceed 58,579 pounds during any consecutive 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
20. The NOx emission concentration from the thermal oxidizer shall not exceed 0.098 lb/MMBtu of natural gas consumption. [District Rule 2201] Federally Enforceable Through Title V Permit
21. The CO emission concentration from the thermal oxidizer shall not exceed 0.082 lb/MMBtu of natural gas consumption. [District Rule 2201] Federally Enforceable Through Title V Permit
22. The VOC emission concentration from the thermal oxidizer shall not exceed 0.005 lb/MMBtu of natural gas consumption. [District Rule 2201] Federally Enforceable Through Title V Permit
23. The SOx emission concentration from the thermal oxidizer shall not exceed 0.00285 lb/MMBtu of natural gas consumption. [District Rules 2201 and 4801]
24. The PM10 emission concentration from the thermal oxidizer shall not exceed 0.0076 lb/MMBtu of natural gas consumption. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

25. 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 and 4604] Federally Enforceable Through Title V Permit
26. 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 and 4604] Federally Enforceable Through Title V Permit
27. The operator shall source test each collection device to determine the capture efficiency at least once five years. [District Rule 2520] Federally Enforceable Through Title V Permit
28. The capture efficiency of VOC emission collection devices shall be determined according to EPA's "Guidelines for Determining Capture Efficiency," January 9, 1995 and 40 CFR 51, Appendix M, Methods 204-204F, as applicable, or any other method approved by EPA, ARB, and the APCO. [District Rules 2520 and 4604] Federally Enforceable Through Title V Permit
29. The operator shall source test the thermal oxidizer at least once every twelve (12) months to demonstrate compliance with the VOC control efficiency requirements. [District Rule 2201] Federally Enforceable Through Title V Permit
30. 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
31. Source testing of the capture efficiency and control efficiency of VOC emission collection and control devices shall be performed under conditions representative of normal operating conditions and under conditions specified in the Permit-To-Operate. [District Rules 1081 and 2520] Federally Enforceable Through Title V Permit
32. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
33. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
34. 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 and 4604] Federally Enforceable Through Title V Permit
35. 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 combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, N-2253-21 and N-2253-22; (g). The operating temperature of the thermal oxidizer. [District Rules 1070, 2520 and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

36. Records of the date, the time period and the reason that the thermal oxidizer is out of service shall be kept. [District Rule 2201, 2520 and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
37. Records of the combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, N-2253-21, and N-2253-22 shall be kept for any consecutive 12-month period. [District Rules 2201 and 2520] Federally Enforceable Through Title V Permit
38. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 4604] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

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# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-2253-2-9

**EXPIRATION DATE:** 10/31/2020

**EQUIPMENT DESCRIPTION:**

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

## 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 Rule 2201] Federally Enforceable Through Title V Permit
3. The VOC contaminated air stream from the side seam stripe coater, conveyor between the coater and curing tunnel, and curing tunnel shall be vented to the thermal oxidizer at all times except when the thermal oxidizer is undergoing maintenance. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The collection system for fugitive VOC emissions from the side seam stripe coater, conveyor between the coater and curing tunnel, and curing tunnel shall have a minimum overall capture efficiency of 71%. [District Rule 2201] 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 control. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The thermal oxidizer shall be equipped with a continuous temperature monitoring and recording device. [District Rules 2201, 2520 and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
7. The overall VOC capture and control efficiency shall be calculated by multiplying the percent VOC capture efficiency of the collection system by the percent VOC control efficiency of the thermal oxidizer and divide by 100. [District Rules 2201 and 4604] Federally Enforceable Through Title V Permit
8. Three-piece can side seam spray operations shall not use or apply any coating with a VOC content in excess of 660 grams of VOC per liter of coating, as applied, excluding water and exempt compounds. [District Rule 4604] Federally Enforceable Through Title V Permit
9. All solvent cleaning activities shall be performed using solvents with VOC contents not exceeding any of the following limits 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): product cleaning during manufacturing process or surface preparation for coating application: 25 g/l (0.21 lb/gal), repair and maintenance cleaning: 25 g/l (0.21 lb/gal), cleaning of coating application equipment except sheet coater for three-piece cans: 25 g/l (0.21 lb/gal), cleaning of sheet coater for three-piece cans: 550 g/l (4.6 lb/gal) until 9/30/2011 and 250 g/l (2.3 lb/gal) on and after 10/1/2011. [District Rule 4604] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

10. For cleaning of coating application equipment used for sheet coating of three-piece cans, cleaning activities that are performed outside the control of an APCO-approved emission control system that meets the requirements of District Rule 4604 (9/20/07) using solvents with a VOC content greater than 25 g/l (0.21 lb/gallon) shall 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 excessive 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. The discharged solvent from the equipment must be collected into containers without atomizing into the open air. The solvent may be flushed through the system by air or hydraulic pressure, or by pumping. [District Rule 4604] Federally Enforceable Through Title V Permit
11. 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
12. 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
13. 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
14. Only electrostatic, flow, roll, dip, hand application, HVLP, or other application methods with a coating transfer efficiency of at least 65% shall be used. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4604]
15. Coating transfer efficiency shall be measured using a test method pursuant to Section 6.7.4 of Rule 4604 (9/20/07). [District Rule 4604] Federally Enforceable Through Title V Permit
16. The VOC emissions due to coating and solvent usage (from this permit unit) shall not exceed 250 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
17. The PM10 emissions due to coating and solvent usage (from this permit unit) shall not exceed 0.4 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
18. The combined daily VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, and N-2253-21 shall not exceed 250 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
19. The combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, N-2253-21, and N-2253-22 shall not exceed 58,579 pounds during any consecutive 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
20. The NOx emission concentration from the thermal oxidizer shall not exceed 0.098 lb/MMBtu of natural gas consumption. [District Rule 2201] Federally Enforceable Through Title V Permit
21. The CO emission concentration from the thermal oxidizer shall not exceed 0.082 lb/MMBtu of natural gas consumption. [District Rule 2201] Federally Enforceable Through Title V Permit
22. The VOC emission concentration from the thermal oxidizer shall not exceed 0.005 lb/MMBtu of natural gas consumption. [District Rule 2201] Federally Enforceable Through Title V Permit
23. The SOx emission concentration from the thermal oxidizer shall not exceed 0.00285 lb/MMBtu of natural gas consumption. [District Rules 2201 and 4801]
24. The PM10 emission concentration from the thermal oxidizer shall not exceed 0.0076 lb/MMBtu of natural gas consumption. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.



25. 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 and 4604] Federally Enforceable Through Title V Permit
26. 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 and 4604] Federally Enforceable Through Title V Permit
27. The operator shall source test each collection device to determine the capture efficiency at least once five years. [District Rule 2520] Federally Enforceable Through Title V Permit
28. The capture efficiency of VOC emission collection devices shall be determined according to EPA's "Guidelines for Determining Capture Efficiency," January 9, 1995 and 40 CFR 51, Appendix M, Methods 204-204F, as applicable, or any other method approved by EPA, ARB, and the APCO. [District Rules 2520 and 4604] Federally Enforceable Through Title V Permit
29. The operator shall source test the thermal oxidizer at least once every twelve (12) months to demonstrate compliance with the VOC control efficiency requirements. [District Rule 2201] Federally Enforceable Through Title V Permit
30. 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
31. Source testing of the capture efficiency and control efficiency of VOC emission collection and control devices shall be performed under conditions representative of normal operating conditions and under conditions specified in the Permit-To-Operate. [District Rules 1081 and 2520] Federally Enforceable Through Title V Permit
32. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
33. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
34. 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 and 4604] Federally Enforceable Through Title V Permit
35. 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 combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, N-2253-21 and N-2253-22; (g). The operating temperature of the thermal oxidizer. [District Rules 1070, 2520 and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

36. Records of the date, the time period and the reason that the thermal oxidizer is out of service shall be kept. [District Rules 2201, 2520 and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
37. Records of the combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, N-2253-21, and N-2253-22 shall be kept for any consecutive 12-month period. [District Rules 2201 and 2520] Federally Enforceable Through Title V Permit
38. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 4604] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

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# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-2253-3-9

**EXPIRATION DATE:** 10/31/2020

**EQUIPMENT DESCRIPTION:**

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

## PERMIT UNIT REQUIREMENTS

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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 Rule 2201] Federally Enforceable Through Title V Permit
3. The VOC contaminated air stream from the side seam stripe coater, conveyor between the coater and curing tunnel, and curing tunnel shall be vented to the thermal oxidizer at all times except when the thermal oxidizer is undergoing maintenance. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The collection system for fugitive VOC emissions from the side seam stripe coater, conveyor between the coater and curing tunnel, and curing tunnel shall have a minimum overall capture efficiency of 71%. [District Rule 2201] 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 control. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The thermal oxidizer shall be equipped with a continuous temperature monitoring and recording device. [District Rules 2201, 2520, and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
7. The overall VOC capture and control efficiency shall be calculated by multiplying the percent VOC capture efficiency of the collection system by the percent VOC control efficiency of the thermal oxidizer and divide by 100. [District Rules 2201 and 4604] Federally Enforceable Through Title V Permit
8. Three-piece can side seam spray operations shall not use or apply any coating with a VOC content in excess of 660 grams of VOC per liter of coating, as applied, excluding water and exempt compounds. [District Rule 4604] Federally Enforceable Through Title V Permit
9. All solvent cleaning activities shall be performed using solvents with VOC contents not exceeding any of the following limits 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): product cleaning during manufacturing process or surface preparation for coating application: 25 g/l (0.21 lb/gal), repair and maintenance cleaning: 25 g/l (0.21 lb/gal), cleaning of coating application equipment except sheet coater for three-piece cans: 25 g/l (0.21 lb/gal), cleaning of sheet coater for three-piece cans: 550 g/l (4.6 lb/gal) until 9/30/2011 and 250 g/l (2.3 lb/gal) on and after 10/1/2011. [District Rule 4604] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

10. For cleaning of coating application equipment used for sheet coating of three-piece cans, cleaning activities that are performed outside the control of an APCO-approved emission control system that meets the requirements of District Rule 4604 (9/20/07) using solvents with a VOC content greater than 25 g/l (0.21 lb/gallon) shall 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 excessive 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. The discharged solvent from the equipment must be collected into containers without atomizing into the open air. The solvent may be flushed through the system by air or hydraulic pressure, or by pumping. [District Rule 4604] Federally Enforceable Through Title V Permit
11. 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
12. 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
13. 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
14. Only electrostatic, flow, roll, dip, hand application, HVLP, or other application methods with a coating transfer efficiency of at least 65% shall be used. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4604]
15. Coating transfer efficiency shall be measured using a test method pursuant to Section 6.7.4 of Rule 4604 (9/20/07). [District Rule 4604] Federally Enforceable Through Title V Permit
16. The VOC emissions due to coating and solvent usage (from this permit unit) shall not exceed 250 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
17. The PM10 emissions due to coating and solvent usage (from this permit unit) shall not exceed 0.4 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
18. The combined daily VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, and N-2253-21 shall not exceed 250 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
19. The combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, N-2253-21, and N-2253-22 shall not exceed 58,579 pounds during any consecutive 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
20. The NOx emission concentration from the thermal oxidizer shall not exceed 0.098 lb/MMBtu of natural gas consumption. [District Rule 2201] Federally Enforceable Through Title V Permit
21. The CO emission concentration from the thermal oxidizer shall not exceed 0.082 lb/MMBtu of natural gas consumption. [District Rule 2201] Federally Enforceable Through Title V Permit
22. The VOC emission concentration from the thermal oxidizer shall not exceed 0.005 lb/MMBtu of natural gas consumption. [District Rule 2201] Federally Enforceable Through Title V Permit
23. The SOx emission concentration from the thermal oxidizer shall not exceed 0.00285 lb/MMBtu of natural gas consumption. [District Rules 2201 and 4801]
24. The PM10 emission concentration from the thermal oxidizer shall not exceed 0.0076 lb/MMBtu of natural gas consumption. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

25. 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 and 4604] Federally Enforceable Through Title V Permit
26. 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 and 4604] Federally Enforceable Through Title V Permit
27. The operator shall source test each collection device to determine the capture efficiency at least once five years. [District Rule 2520] Federally Enforceable Through Title V Permit
28. The capture efficiency of VOC emission collection devices shall be determined according to EPA's "Guidelines for Determining Capture Efficiency," January 9, 1995 and 40 CFR 51, Appendix M, Methods 204-204F, as applicable, or any other method approved by EPA, ARB, and the APCO. [District Rules 2520 and 4604] Federally Enforceable Through Title V Permit
29. The operator shall source test the thermal oxidizer at least once every twelve (12) months to demonstrate compliance with the VOC control efficiency requirements. [District Rule 2201] Federally Enforceable Through Title V Permit
30. 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
31. Source testing of the capture efficiency and control efficiency of VOC emission collection and control devices shall be performed under conditions representative of normal operating conditions and under conditions specified in the Permit-To-Operate. [District Rules 1081 and 2520] Federally Enforceable Through Title V Permit
32. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
33. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
34. 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 and 4604] Federally Enforceable Through Title V Permit
35. 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 combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, N-2253-21 and N-2253-22; (g). The operating temperature of the thermal oxidizer. [District Rules 1070, 2520 and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

36. Records of the date, the time period and the reason that the thermal oxidizer is out of service shall be kept. [District Rules 2201, 2520 and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
37. Records of the combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, N-2253-21, and N-2253-22 shall be kept for any consecutive 12-month period. [District Rules 2201 and 2520] Federally Enforceable Through Title V Permit
38. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 4604] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

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# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-2253-4-9

**EXPIRATION DATE:** 10/31/2020

**EQUIPMENT DESCRIPTION:**

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

## PERMIT UNIT REQUIREMENTS

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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 Rule 2201] Federally Enforceable Through Title V Permit
3. The VOC contaminated air stream from the side seam stripe coater, conveyor between the coater and curing tunnel, and curing tunnel shall be vented to the thermal oxidizer at all times except when the thermal oxidizer is undergoing maintenance. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The collection system for fugitive VOC emissions from the side seam stripe coater, conveyor between the coater and curing tunnel, and curing tunnel shall have a minimum overall capture efficiency of 71%. [District Rule 2201] 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 control. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The thermal oxidizer shall be equipped with a continuous temperature monitoring and recording device. [District Rules 2201, 2520 and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
7. The overall VOC capture and control efficiency shall be calculated by multiplying the percent VOC capture efficiency of the collection system by the percent VOC control efficiency of the thermal oxidizer and divide by 100. [District Rules 2201 and 4604] Federally Enforceable Through Title V Permit
8. Three-piece can side seam spray operations shall not use or apply any coating with a VOC content in excess of 660 grams of VOC per liter of coating, as applied, excluding water and exempt compounds. [District Rule 4604] Federally Enforceable Through Title V Permit
9. All solvent cleaning activities shall be performed using solvents with VOC contents not exceeding any of the following limits 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): product cleaning during manufacturing process or surface preparation for coating application: 25 g/l (0.21 lb/gal), repair and maintenance cleaning: 25 g/l (0.21 lb/gal), cleaning of coating application equipment except sheet coater for three-piece cans: 25 g/l (0.21 lb/gal), cleaning of sheet coater for three-piece cans: 550 g/l (4.6 lb/gal) until 9/30/2011 and 250 g/l (2.3 lb/gal) on and after 10/1/2011. [District Rule 4604] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

10. For cleaning of coating application equipment used for sheet coating of three-piece cans, cleaning activities that are performed outside the control of an APCO-approved emission control system that meets the requirements of District Rule 4604 (9/20/07) using solvents with a VOC content greater than 25 g/l (0.21 lb/gallon) shall 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 excessive 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. The discharged solvent from the equipment must be collected into containers without atomizing into the open air. The solvent may be flushed through the system by air or hydraulic pressure, or by pumping. [District Rule 4604] Federally Enforceable Through Title V Permit
11. 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
12. 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
13. 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
14. Only electrostatic, flow, roll, dip, hand application, HVLP, or other application methods with a coating transfer efficiency of at least 65% shall be used. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4604]
15. Coating transfer efficiency shall be measured using a test method pursuant to Section 6.7.4 of Rule 4604 (9/20/07). [District Rule 4604] Federally Enforceable Through Title V Permit
16. The VOC emissions due to coating and solvent usage (from this permit unit) shall not exceed 250 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
17. The PM10 emissions due to coating and solvent usage (from this permit unit) shall not exceed 0.4 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
18. The combined daily VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, and N-2253-21 shall not exceed 250 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
19. The combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, N-2253-21, and N-2253-22 shall not exceed 58,579 pounds during any consecutive 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
20. The NOx emission concentration from the thermal oxidizer shall not exceed 0.098 lb/MMBtu of natural gas consumption. [District Rule 2201] Federally Enforceable Through Title V Permit
21. The CO emission concentration from the thermal oxidizer shall not exceed 0.082 lb/MMBtu of natural gas consumption. [District Rule 2201] Federally Enforceable Through Title V Permit
22. The VOC emission concentration from the thermal oxidizer shall not exceed 0.005 lb/MMBtu of natural gas consumption. [District Rule 2201] Federally Enforceable Through Title V Permit
23. The SOx emission concentration from the thermal oxidizer shall not exceed 0.00285 lb/MMBtu of natural gas consumption. [District Rules 2201 and 4801]
24. The PM10 emission concentration from the thermal oxidizer shall not exceed 0.0076 lb/MMBtu of natural gas consumption. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.



25. 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 and 4604] Federally Enforceable Through Title V Permit
26. 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 and 4604] Federally Enforceable Through Title V Permit
27. The operator shall source test each collection device to determine the capture efficiency at least once five years. [District Rule 2520] Federally Enforceable Through Title V Permit
28. The capture efficiency of VOC emission collection devices shall be determined according to EPA's "Guidelines for Determining Capture Efficiency," January 9, 1995 and 40 CFR 51, Appendix M, Methods 204-204F, as applicable, or any other method approved by EPA, ARB, and the APCO. [District Rules 2520 and 4604] Federally Enforceable Through Title V Permit
29. The operator shall source test the thermal oxidizer at least once every twelve (12) months to demonstrate compliance with the VOC control efficiency requirements. [District Rule 2201] Federally Enforceable Through Title V Permit
30. 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
31. Source testing of the capture efficiency and control efficiency of VOC emission collection and control devices shall be performed under conditions representative of normal operating conditions and under conditions specified in the Permit-To-Operate. [District Rules 1081 and 2520] Federally Enforceable Through Title V Permit
32. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
33. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
34. 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 and 4604] Federally Enforceable Through Title V Permit
35. 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 combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, N-2253-21 and N-2253-22; (g). The operating temperature of the thermal oxidizer. [District Rules 1070, 2520 and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

36. Records of the date, the time period and the reason that the thermal oxidizer is out of service shall be kept. [District Rules 2201, 2520 and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
37. Records of the combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, N-2253-21, and N-2253-22 shall be kept for any consecutive 12-month period. [District Rules 2201 and 2520] Federally Enforceable Through Title V Permit
38. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 4604] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

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# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-2253-6-9

**EXPIRATION DATE:** 10/31/2020

**EQUIPMENT DESCRIPTION:**

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

## 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 Rule 2201] Federally Enforceable Through Title V Permit
3. The VOC contaminated air stream from the side seam stripe coater, conveyor between the coater and curing tunnel, and curing tunnel shall be vented to the thermal oxidizer at all times except when the thermal oxidizer is undergoing maintenance. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The collection system for fugitive VOC emissions from the side seam stripe coater, conveyor between the coater and curing tunnel, and curing tunnel shall have a minimum overall capture efficiency of 71%. [District Rule 2201] 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 control. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The thermal oxidizer shall be equipped with a continuous temperature monitoring and recording device. [District Rules 2201, 2520 and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
7. The overall VOC capture and control efficiency shall be calculated by multiplying the percent VOC capture efficiency of the collection system by the percent VOC control efficiency of the thermal oxidizer and divide by 100. [District Rules 2201 and 4604] Federally Enforceable Through Title V Permit
8. Three-piece can side seam spray operations shall not use or apply any coating with a VOC content in excess of 660 grams of VOC per liter of coating, as applied, excluding water and exempt compounds. [District Rule 4604] Federally Enforceable Through Title V Permit
9. All solvent cleaning activities shall be performed using solvents with VOC contents not exceeding any of the following limits 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): product cleaning during manufacturing process or surface preparation for coating application: 25 g/l (0.21 lb/gal), repair and maintenance cleaning: 25 g/l (0.21 lb/gal), cleaning of coating application equipment except sheet coater for three-piece cans: 25 g/l (0.21 lb/gal), cleaning of sheet coater for three-piece cans: 550 g/l (4.6 lb/gal) until 9/30/2011 and 250 g/l (2.3 lb/gal) on and after 10/1/2011. [District Rule 4604] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

10. For cleaning of coating application equipment used for sheet coating of three-piece cans, cleaning activities that are performed outside the control of an APCO-approved emission control system that meets the requirements of District Rule 4604 (9/20/07) using solvents with a VOC content greater than 25 g/l (0.21 lb/gallon) shall 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 excessive 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. The discharged solvent from the equipment must be collected into containers without atomizing into the open air. The solvent may be flushed through the system by air or hydraulic pressure, or by pumping. [District Rule 4604] Federally Enforceable Through Title V Permit
11. 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
12. 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
13. 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
14. Only electrostatic, flow, roll, dip, hand application, HVLP, or other application methods with a coating transfer efficiency of at least 65% shall be used. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4604]
15. Coating transfer efficiency shall be measured using a test method pursuant to Section 6.7.4 of Rule 4604 (9/20/07). [District Rule 4604] Federally Enforceable Through Title V Permit
16. The VOC emissions due to coating and solvent usage (from this permit unit) shall not exceed 250 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
17. The PM10 emissions due to coating and solvent usage (from this permit unit) shall not exceed 0.4 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
18. The combined daily VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, and N-2253-21 shall not exceed 250 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
19. The combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, N-2253-21, and N-2253-22 shall not exceed 58,579 pounds during any consecutive 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
20. The NOx emission concentration from the thermal oxidizer shall not exceed 0.098 lb/MMBtu of natural gas consumption. [District Rule 2201] Federally Enforceable Through Title V Permit
21. The CO emission concentration from the thermal oxidizer shall not exceed 0.082 lb/MMBtu of natural gas consumption. [District Rule 2201] Federally Enforceable Through Title V Permit
22. The VOC emission concentration from the thermal oxidizer shall not exceed 0.005 lb/MMBtu of natural gas consumption. [District Rule 2201] Federally Enforceable Through Title V Permit
23. The SOx emission concentration from the thermal oxidizer shall not exceed 0.00285 lb/MMBtu of natural gas consumption. [District Rules 2201 and 4801]
24. The PM10 emission concentration from the thermal oxidizer shall not exceed 0.0076 lb/MMBtu of natural gas consumption. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

25. 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 and 4604] Federally Enforceable Through Title V Permit
26. 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 and 4604] Federally Enforceable Through Title V Permit
27. The operator shall source test each collection device to determine the capture efficiency at least once five years. [District Rule 2520] Federally Enforceable Through Title V Permit
28. The capture efficiency of VOC emission collection devices shall be determined according to EPA's "Guidelines for Determining Capture Efficiency," January 9, 1995 and 40 CFR 51, Appendix M, Methods 204-204F, as applicable, or any other method approved by EPA, ARB, and the APCO. [District Rules 2520 and 4604] Federally Enforceable Through Title V Permit
29. The operator shall source test the thermal oxidizer at least once every twelve (12) months to demonstrate compliance with the VOC control efficiency requirements. [District Rule 2201] Federally Enforceable Through Title V Permit
30. 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
31. Source testing of the capture efficiency and control efficiency of VOC emission collection and control devices shall be performed under conditions representative of normal operating conditions and under conditions specified in the Permit-To-Operate. [District Rules 1081 and 2520] Federally Enforceable Through Title V Permit
32. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
33. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
34. 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 and 4604] Federally Enforceable Through Title V Permit
35. 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 combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, N-2253-21 and N-2253-22; (g). The operating temperature of the thermal oxidizer. [District Rules 1070, 2520 and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

36. Records of the date, the time period and the reason that the thermal oxidizer is out of service shall be kept. [District Rules 2201, 2520 and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
37. Records of the combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, N-2253-21, and N-2253-22 shall be kept for any consecutive 12-month period. [District Rules 2201 and 2520] Federally Enforceable Through Title V Permit
38. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 4604] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

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# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-2253-7-9

**EXPIRATION DATE:** 10/31/2020

**EQUIPMENT DESCRIPTION:**

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

## 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 Rule 2201] Federally Enforceable Through Title V Permit
3. The VOC contaminated air stream from the side seam stripe coater, conveyor between the coater and curing tunnel, and curing tunnel shall be vented to the thermal oxidizer at all times except when the thermal oxidizer is undergoing maintenance. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The collection system for fugitive VOC emissions from the side seam stripe coater, conveyor between the coater and curing tunnel, and curing tunnel shall have a minimum overall capture efficiency of 71%. [District Rule 2201] 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 control. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The thermal oxidizer shall be equipped with a continuous temperature monitoring and recording device. [District Rules 2201, 2520 and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
7. The overall VOC capture and control efficiency shall be calculated by multiplying the percent VOC capture efficiency of the collection system by the percent VOC control efficiency of the thermal oxidizer and divide by 100. [District Rules 2201 and 4604] Federally Enforceable Through Title V Permit
8. Three-piece can side seam spray operations shall not use or apply any coating with a VOC content in excess of 660 grams of VOC per liter of coating, as applied, excluding water and exempt compounds. [District Rule 4604] Federally Enforceable Through Title V Permit
9. All solvent cleaning activities shall be performed using solvents with VOC contents not exceeding any of the following limits 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): product cleaning during manufacturing process or surface preparation for coating application: 25 g/l (0.21 lb/gal), repair and maintenance cleaning: 25 g/l (0.21 lb/gal), cleaning of coating application equipment except sheet coater for three-piece cans: 25 g/l (0.21 lb/gal), cleaning of sheet coater for three-piece cans: 550 g/l (4.6 lb/gal) until 9/30/2011 and 250 g/l (2.3 lb/gal) on and after 10/1/2011. [District Rule 4604] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

10. For cleaning of coating application equipment used for sheet coating of three-piece cans, cleaning activities that are performed outside the control of an APCO-approved emission control system that meets the requirements of District Rule 4604 (9/20/07) using solvents with a VOC content greater than 25 g/l (0.21 lb/gallon) shall 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 excessive 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. The discharged solvent from the equipment must be collected into containers without atomizing into the open air. The solvent may be flushed through the system by air or hydraulic pressure, or by pumping. [District Rule 4604] Federally Enforceable Through Title V Permit
11. 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
12. 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
13. 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
14. Only electrostatic, flow, roll, dip, hand application, HVLP, or other application methods with a coating transfer efficiency of at least 65% shall be used. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4604]
15. Coating transfer efficiency shall be measured using a test method pursuant to Section 6.7.4 of Rule 4604 (9/20/07). [District Rule 4604] Federally Enforceable Through Title V Permit
16. The VOC emissions due to coating and solvent usage (from this permit unit) shall not exceed 250 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
17. The PM10 emissions due to coating and solvent usage (from this permit unit) shall not exceed 0.4 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
18. The combined daily VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, and N-2253-21 shall not exceed 250 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
19. The combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, N-2253-21, and N-2253-22 shall not exceed 58,579 pounds during any consecutive 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
20. The NOx emission concentration from the thermal oxidizer shall not exceed 0.098 lb/MMBtu of natural gas consumption. [District Rule 2201] Federally Enforceable Through Title V Permit
21. The CO emission concentration from the thermal oxidizer shall not exceed 0.082 lb/MMBtu of natural gas consumption. [District Rule 2201] Federally Enforceable Through Title V Permit
22. The VOC emission concentration from the thermal oxidizer shall not exceed 0.005 lb/MMBtu of natural gas consumption. [District Rule 2201] Federally Enforceable Through Title V Permit
23. The SOx emission concentration from the thermal oxidizer shall not exceed 0.00285 lb/MMBtu of natural gas consumption. [District Rules 2201 and 4801]
24. The PM10 emission concentration from the thermal oxidizer shall not exceed 0.0076 lb/MMBtu of natural gas consumption. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.



25. 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 and 4604] Federally Enforceable Through Title V Permit
26. 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 and 4604] Federally Enforceable Through Title V Permit
27. The operator shall source test each collection device to determine the capture efficiency at least once five years. [District Rule 2520] Federally Enforceable Through Title V Permit
28. The capture efficiency of VOC emission collection devices shall be determined according to EPA's "Guidelines for Determining Capture Efficiency," January 9, 1995 and 40 CFR 51, Appendix M, Methods 204-204F, as applicable, or any other method approved by EPA, ARB, and the APCO. [District Rules 2520 and 4604] Federally Enforceable Through Title V Permit
29. The operator shall source test the thermal oxidizer at least once every twelve (12) months to demonstrate compliance with the VOC control efficiency requirements. [District Rule 2201] Federally Enforceable Through Title V Permit
30. 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
31. Source testing of the capture efficiency and control efficiency of VOC emission collection and control devices shall be performed under conditions representative of normal operating conditions and under conditions specified in the Permit-To-Operate. [District Rules 1081 and 2520] Federally Enforceable Through Title V Permit
32. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
33. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
34. 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 and 4604] Federally Enforceable Through Title V Permit
35. 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 combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, N-2253-21 and N-2253-22; (g). The operating temperature of the thermal oxidizer. [District Rules 1070, 2520 and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

36. Records of the date, the time period and the reason that the thermal oxidizer is out of service shall be kept. [District Rules 2201, 2520 and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
37. Records of the combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, N-2253-21, and N-2253-22 shall be kept for any consecutive 12-month period. [District Rules 2201 and 2520] Federally Enforceable Through Title V Permit
38. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 4604] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

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# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-2253-8-9

**EXPIRATION DATE:** 10/31/2020

**EQUIPMENT DESCRIPTION:**

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

## 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 Rule 2201] Federally Enforceable Through Title V Permit
3. The VOC contaminated air stream from the side seam stripe coater, conveyor between the coater and curing tunnel, and curing tunnel shall be vented to the thermal oxidizer at all times except when the thermal oxidizer is undergoing maintenance. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The collection system for fugitive VOC emissions from the side seam stripe coater, conveyor between the coater and curing tunnel, and curing tunnel shall have a minimum overall capture efficiency of 71%. [District Rule 2201] 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 control. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The thermal oxidizer shall be equipped with a continuous temperature monitoring and recording device. [District Rules 2201, 2520 and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
7. The overall VOC capture and control efficiency shall be calculated by multiplying the percent VOC capture efficiency of the collection system by the percent VOC control efficiency of the thermal oxidizer and divide by 100. [District Rules 2201 and 4604] Federally Enforceable Through Title V Permit
8. Three-piece can side seam spray operations shall not use or apply any coating with a VOC content in excess of 660 grams of VOC per liter of coating, as applied, excluding water and exempt compounds. [District Rule 4604] Federally Enforceable Through Title V Permit
9. All solvent cleaning activities shall be performed using solvents with VOC contents not exceeding any of the following limits 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): product cleaning during manufacturing process or surface preparation for coating application: 25 g/l (0.21 lb/gal), repair and maintenance cleaning: 25 g/l (0.21 lb/gal), cleaning of coating application equipment except sheet coater for three-piece cans: 25 g/l (0.21 lb/gal), cleaning of sheet coater for three-piece cans: 550 g/l (4.6 lb/gal) until 9/30/2011 and 250 g/l (2.3 lb/gal) on and after 10/1/2011. [District Rule 4604] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

10. For cleaning of coating application equipment used for sheet coating of three-piece cans, cleaning activities that are performed outside the control of an APCO-approved emission control system that meets the requirements of District Rule 4604 (9/20/07) using solvents with a VOC content greater than 25 g/l (0.21 lb/gallon) shall 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 excessive 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. The discharged solvent from the equipment must be collected into containers without atomizing into the open air. The solvent may be flushed through the system by air or hydraulic pressure, or by pumping. [District Rule 4604] Federally Enforceable Through Title V Permit
11. 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
12. 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
13. 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
14. Only electrostatic, flow, roll, dip, hand application, HVLP, or other application methods with a coating transfer efficiency of at least 65% shall be used. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4604]
15. Coating transfer efficiency shall be measured using a test method pursuant to Section 6.7.4 of Rule 4604 (9/20/07). [District Rule 4604] Federally Enforceable Through Title V Permit
16. The VOC emissions due to coating and solvent usage (from this permit unit) shall not exceed 250 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
17. The PM10 emissions due to coating and solvent usage (from this permit unit) shall not exceed 0.4 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
18. The combined daily VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, and N-2253-21 shall not exceed 250 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
19. The combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, N-2253-21, and N-2253-22 shall not exceed 58,579 pounds during any consecutive 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
20. The NOx emission concentration from the thermal oxidizer shall not exceed 0.098 lb/MMBtu of natural gas consumption. [District Rule 2201] Federally Enforceable Through Title V Permit
21. The CO emission concentration from the thermal oxidizer shall not exceed 0.082 lb/MMBtu of natural gas consumption. [District Rule 2201] Federally Enforceable Through Title V Permit
22. The VOC emission concentration from the thermal oxidizer shall not exceed 0.005 lb/MMBtu of natural gas consumption. [District Rule 2201] Federally Enforceable Through Title V Permit
23. The SOx emission concentration from the thermal oxidizer shall not exceed 0.00285 lb/MMBtu of natural gas consumption. [District Rules 2201 and 4801]
24. The PM10 emission concentration from the thermal oxidizer shall not exceed 0.0076 lb/MMBtu of natural gas consumption. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

25. 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 and 4604] Federally Enforceable Through Title V Permit
26. 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 and 4604] Federally Enforceable Through Title V Permit
27. The operator shall source test each collection device to determine the capture efficiency at least once five years. [District Rule 2520] Federally Enforceable Through Title V Permit
28. The capture efficiency of VOC emission collection devices shall be determined according to EPA's "Guidelines for Determining Capture Efficiency," January 9, 1995 and 40 CFR 51, Appendix M, Methods 204-204F, as applicable, or any other method approved by EPA, ARB, and the APCO. [District Rules 2520 and 4604] Federally Enforceable Through Title V Permit
29. The operator shall source test the thermal oxidizer at least once every twelve (12) months to demonstrate compliance with the VOC control efficiency requirements. [District Rule 2201] Federally Enforceable Through Title V Permit
30. 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
31. Source testing of the capture efficiency and control efficiency of VOC emission collection and control devices shall be performed under conditions representative of normal operating conditions and under conditions specified in the Permit-To-Operate. [District Rules 1081 and 2520] Federally Enforceable Through Title V Permit
32. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
33. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
34. 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 and 4604] Federally Enforceable Through Title V Permit
35. 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 combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, N-2253-21 and N-2253-22; (g). The operating temperature of the thermal oxidizer. [District Rules 1070, 2520 and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

36. Records of the date, the time period and the reason that the thermal oxidizer is out of service shall be kept. [District Rules 2201, 2520 and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
37. Records of the combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, N-2253-21, and N-2253-22 shall be kept for any consecutive 12-month period. [District Rules 2201 and 2520] Federally Enforceable Through Title V Permit
38. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 4604] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

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# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-2253-9-9

**EXPIRATION DATE:** 10/31/2020

**EQUIPMENT DESCRIPTION:**

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

## 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 Rule 2201] Federally Enforceable Through Title V Permit
3. The VOC contaminated air stream from the side seam stripe coater, conveyor between the coater and curing tunnel, and curing tunnel shall be vented to the thermal oxidizer at all times except when the thermal oxidizer is undergoing maintenance. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The collection system for fugitive VOC emissions from the side seam stripe coater, conveyor between the coater and curing tunnel, and curing tunnel shall have a minimum overall capture efficiency of 71%. [District Rule 2201] 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 control. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The thermal oxidizer shall be equipped with a continuous temperature monitoring and recording device. [District Rules 2201, 2520 and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
7. The overall VOC capture and control efficiency shall be calculated by multiplying the percent VOC capture efficiency of the collection system by the percent VOC control efficiency of the thermal oxidizer and divide by 100. [District Rules 2201 and 4604] Federally Enforceable Through Title V Permit
8. Three-piece can side seam spray operations shall not use or apply any coating with a VOC content in excess of 660 grams of VOC per liter of coating, as applied, excluding water and exempt compounds. [District Rule 4604] Federally Enforceable Through Title V Permit
9. All solvent cleaning activities shall be performed using solvents with VOC contents not exceeding any of the following limits 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): product cleaning during manufacturing process or surface preparation for coating application: 25 g/l (0.21 lb/gal), repair and maintenance cleaning: 25 g/l (0.21 lb/gal), cleaning of coating application equipment except sheet coater for three-piece cans: 25 g/l (0.21 lb/gal), cleaning of sheet coater for three-piece cans: 550 g/l (4.6 lb/gal) until 9/30/2011 and 250 g/l (2.3 lb/gal) on and after 10/1/2011. [District Rule 4604] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

10. For cleaning of coating application equipment used for sheet coating of three-piece cans, cleaning activities that are performed outside the control of an APCO-approved emission control system that meets the requirements of District Rule 4604 (9/20/07) using solvents with a VOC content greater than 25 g/l (0.21 lb/gallon) shall 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 excessive 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. The discharged solvent from the equipment must be collected into containers without atomizing into the open air. The solvent may be flushed through the system by air or hydraulic pressure, or by pumping. [District Rule 4604] Federally Enforceable Through Title V Permit
11. 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
12. 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
13. 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
14. Only electrostatic, flow, roll, dip, hand application, HVLP, or other application methods with a coating transfer efficiency of at least 65% shall be used. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4604]
15. Coating transfer efficiency shall be measured using a test method pursuant to Section 6.7.4 of Rule 4604 (9/20/07). [District Rule 4604] Federally Enforceable Through Title V Permit
16. The VOC emissions due to coating and solvent usage (from this permit unit) shall not exceed 250 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
17. The PM10 emissions due to coating and solvent usage (from this permit unit) shall not exceed 0.4 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
18. The combined daily VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, and N-2253-21 shall not exceed 250 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
19. The combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, N-2253-21, and N-2253-22 shall not exceed 58,579 pounds during any consecutive 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
20. The NOx emission concentration from the thermal oxidizer shall not exceed 0.098 lb/MMBtu of natural gas consumption. [District Rule 2201] Federally Enforceable Through Title V Permit
21. The CO emission concentration from the thermal oxidizer shall not exceed 0.082 lb/MMBtu of natural gas consumption. [District Rule 2201] Federally Enforceable Through Title V Permit
22. The VOC emission concentration from the thermal oxidizer shall not exceed 0.005 lb/MMBtu of natural gas consumption. [District Rule 2201] Federally Enforceable Through Title V Permit
23. The SOx emission concentration from the thermal oxidizer shall not exceed 0.00285 lb/MMBtu of natural gas consumption. [District Rules 2201 and 4801]
24. The PM10 emission concentration from the thermal oxidizer shall not exceed 0.0076 lb/MMBtu of natural gas consumption. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.



25. 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 and 4604] Federally Enforceable Through Title V Permit
26. 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 and 4604] Federally Enforceable Through Title V Permit
27. The operator shall source test each collection device to determine the capture efficiency at least once five years. [District Rule 2520] Federally Enforceable Through Title V Permit
28. The capture efficiency of VOC emission collection devices shall be determined according to EPA's "Guidelines for Determining Capture Efficiency," January 9, 1995 and 40 CFR 51, Appendix M, Methods 204-204F, as applicable, or any other method approved by EPA, ARB, and the APCO. [District Rules 2520 and 4604] Federally Enforceable Through Title V Permit
29. The operator shall source test the thermal oxidizer at least once every twelve (12) months to demonstrate compliance with the VOC control efficiency requirements. [District Rule 2201] Federally Enforceable Through Title V Permit
30. 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
31. Source testing of the capture efficiency and control efficiency of VOC emission collection and control devices shall be performed under conditions representative of normal operating conditions and under conditions specified in the Permit-To-Operate. [District Rules 1081 and 2520] Federally Enforceable Through Title V Permit
32. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
33. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
34. 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 and 4604] Federally Enforceable Through Title V Permit
35. 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 combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, N-2253-21 and N-2253-22; (g). The operating temperature of the thermal oxidizer. [District Rules 1070, 2520 and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

36. Records of the date, the time period and the reason that the thermal oxidizer is out of service shall be kept. [District Rules 2201, 2520 and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
37. Records of the combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, N-2253-21, and N-2253-22 shall be kept for any consecutive 12-month period. [District Rules 2201 and 2520] Federally Enforceable Through Title V Permit
38. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 4604] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

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# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-2253-15-15

**EXPIRATION DATE:** 10/31/2020

**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 Rules 2201 and 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 Rule 2201] 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 Rules 2201, 2520 and 4604, and 40 CFR Part 64]
5. The thermal oxidizer shall be equipped with an operational continuous temperature monitoring and recording device. [District Rules 2201, 2520 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 Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

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 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 NO<sub>x</sub> and CO emissions from the curing oven exhaust shall be conducted at least once every 24 months. [District Rules 2201 and 4309]
16. NO<sub>x</sub> 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 (O<sub>2</sub>) 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 NO<sub>x</sub> and CO shall be reported in ppmv @ 19% O<sub>2</sub>, 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] 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] Federally Enforceable Through Title V Permit
24. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> 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

These terms and conditions are part of the Facility-wide Permit to Operate.

25. If either the NO<sub>x</sub> or CO concentrations corrected to 19% O<sub>2</sub>, 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 NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 19% O<sub>2</sub>, (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

These terms and conditions are part of the Facility-wide Permit to Operate.

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 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 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 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 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] 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 Rule 2201] 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 4309 and 4604] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-2253-16-15

**EXPIRATION DATE:** 10/31/2020

**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 Rules 2201 and 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 Rule 2201] 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 Rules 2201, 2520 and 4604, and 40 CFR Part 64]
6. The thermal oxidizer shall be equipped with an operational continuous temperature monitoring and recording device. [District Rules 2201, 2520 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 Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

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 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 NO<sub>x</sub> and CO emissions from the curing oven exhaust shall be conducted at least once every 24 months. [District Rules 2201 and 4309]
17. NO<sub>x</sub> 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 (O<sub>2</sub>) 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 NO<sub>x</sub> and CO shall be reported in ppmv @ 19% O<sub>2</sub>, 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] 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] Federally Enforceable Through Title V Permit
25. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> 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

These terms and conditions are part of the Facility-wide Permit to Operate.



26. If either the NO<sub>x</sub> or CO concentrations corrected to 19% O<sub>2</sub>, 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 NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 19% O<sub>2</sub>, (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

These terms and conditions are part of the Facility-wide Permit to Operate.

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 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 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 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 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] 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 Rule 2201] 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 4309 and 4604] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-2253-17-15

**EXPIRATION DATE:** 10/31/2020

**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 Rules 2201 and 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 Rule 2201] 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 Rules 2201, 2520 and 4604, and 40 CFR Part 64]
5. The thermal oxidizer shall be equipped with an operational continuous temperature monitoring and recording device. [District Rules 2201, 2520 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 Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

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 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 NO<sub>x</sub> and CO emissions from the curing oven exhaust shall be conducted at least once every 24 months. [District Rules 2201 and 4309]
16. NO<sub>x</sub> 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 (O<sub>2</sub>) 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 NO<sub>x</sub> and CO shall be reported in ppmv @ 19% O<sub>2</sub>, 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] 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] Federally Enforceable Through Title V Permit
24. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> 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

These terms and conditions are part of the Facility-wide Permit to Operate.

25. If either the NO<sub>x</sub> or CO concentrations corrected to 19% O<sub>2</sub>, 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 NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 19% O<sub>2</sub>, (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

These terms and conditions are part of the Facility-wide Permit to Operate.

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 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 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 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 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] 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 Rule 2201] 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 4309 and 4604] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-2253-18-10

**EXPIRATION DATE:** 10/31/2020

**EQUIPMENT DESCRIPTION:**

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

## PERMIT UNIT REQUIREMENTS

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1. 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 Rule 2201] Federally Enforceable Through Title V Permit
2. 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
3. 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
4. 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
5. 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
6. The VOC emissions due to coating and solvent use shall not exceed 0.2 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
7. 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
8. 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 for any consecutive 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

9. 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 and 4604] Federally Enforceable Through Title V Permit
10. 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 and 4604] Federally Enforceable Through Title V Permit
11. 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 and 4604] Federally Enforceable Through Title V Permit
12. 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. [District Rules 1070, 2520 and 4604] Federally Enforceable Through Title V Permit
13. 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] Federally Enforceable Through Title V Permit
14. Records of the combined annual 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 Rule 2201] Federally Enforceable Through Title V Permit
15. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 4604] Federally Enforceable Through Title V Permit

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# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-2253-19-6

**EXPIRATION DATE:** 10/31/2020

**EQUIPMENT DESCRIPTION:**

COATING STORAGE TANK #1 CONSISTING OF ONE 8,000 GALLON ABOVEGROUND VERTICAL FIXED ROOF STORAGE TANK

## PERMIT UNIT REQUIREMENTS

1. The maximum amount of coatings received into the storage tank shall not exceed 8,000 gallons in any one day and 416,000 gallons in any one calendar year. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The VOC emission rate from the receiving and storage of the coatings shall not exceed 0.6 lb VOC/day and 27 lb VOC/year. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Organic liquids that are received, stored, or held in this tank shall have a true vapor pressure (TVP) less than 0.5 psia under all storage conditions. [District Rule 4623] Federally Enforceable Through Title V Permit
4. Permittee shall conduct true vapor pressure (TVP) testing of the organic liquid stored in this tank at least once every 24 months during the summer (July - September), and/or whenever there is a change in the source or type of organic liquid stored in this tank. In lieu of testing each tank, the permittee may conduct TVP testing of a representative tank provided the requirements of District Rule 4623 (amended 5/19/05), Section 6.2 are satisfied. TVP testing shall not be required for tanks that exclusively store organic liquids listed in Appendix A of District Rule 4623, provided the storage temperature indicated in Appendix A is not exceeded at any time. [District Rule 4623] Federally Enforceable Through Title V Permit
5. The TVP testing shall be conducted at actual storage temperature of the organic liquid in the tank. [District Rule 4623] Federally Enforceable Through Title V Permit
6. The TVP of any organic liquid, except for crude oil, shall be determined by measuring the Reid Vapor Pressure (RVP) using ASTM D 323 (Test Method for Vapor Pressure for Petroleum Products), and converting the RVP to TVP at the tank's maximum organic liquid storage temperature. The conversion of RVP to TVP shall be done in accordance with the procedures in Appendix B. Appendix B is an excerpt from the oil and gas section of "ARB Technical Guidance Document to the Criteria and Guidelines Regulation for AB 2588", dated August 1989. [District Rule 4623] Federally Enforceable Through Title V Permit
7. Permittee shall submit the records of TVP and API gravity testing to the APCO within 45 days after the date of testing. The records shall include the tank identification number, Permit to Operate number, type of stored organic liquid, TVP and API gravity of the organic liquid, test methods used, and a copy of the test results. [District Rule 4623] Federally Enforceable Through Title V Permit
8. The operator shall maintain records that indicate the true vapor pressure (TVP) of the coatings stored, the daily quantity of coatings received into the tank, and the cumulative annual quantity of coatings received into the storage tank. [District Rule 2201, 2520 and 4623] Federally Enforceable Through Title V Permit
9. The operator shall keep an accurate record of each organic liquid stored in each tank, including its storage temperature, TVP, and API gravity. [District Rules 2520 and 4623] Federally Enforceable Through Title V Permit
10. All records shall be retained for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rules 1070, 2520 and 4623] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-2253-20-6

**EXPIRATION DATE:** 10/31/2020

**EQUIPMENT DESCRIPTION:**

COATING STORAGE TANK #2 CONSISTING OF ONE 8,000 GALLON ABOVEGROUND VERTICAL FIXED ROOF STORAGE TANK

## PERMIT UNIT REQUIREMENTS

1. The maximum amount of coatings received into the storage tank shall not exceed 8,000 gallons in any one day and 416,000 gallons in any one calendar year. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The VOC emission rate from the receiving and storage of the coatings shall not exceed 0.6 lb VOC/day and 27 lb VOC/year. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Organic liquids that are received, stored, or held in this tank shall have a true vapor pressure (TVP) less than 0.5 psia under all storage conditions. [District Rule 4623] Federally Enforceable Through Title V Permit
4. Permittee shall conduct true vapor pressure (TVP) testing of the organic liquid stored in this tank at least once every 24 months during summer (July - September), and/or whenever there is a change in the source or type of organic liquid stored in this tank. In lieu of testing each tank, the permittee may conduct TVP testing of a representative tank provided the requirements of District Rule 4623 (amended 5/19/05), Section 6.2 are satisfied. TVP testing shall not be required for tanks that exclusively store organic liquids listed in Appendix A of District Rule 4623, provided the storage temperature indicated in Appendix A is not exceeded at any time. [District Rule 4623] Federally Enforceable Through Title V Permit
5. The TVP testing shall be conducted at actual storage temperature of the organic liquid in the tank. [District Rule 4623] Federally Enforceable Through Title V Permit
6. The TVP of any organic liquid, except for crude oil, shall be determined by measuring the Reid Vapor Pressure (RVP) using ASTM D 323 (Test Method for Vapor Pressure for Petroleum Products), and converting the RVP to TVP at the tank's maximum organic liquid storage temperature. The conversion of RVP to TVP shall be done in accordance with the procedures in Appendix B. Appendix B is an excerpt from the oil and gas section of "ARB Technical Guidance Document to the Criteria and Guidelines Regulation for AB 2588", dated August 1989. [District Rule 4623] Federally Enforceable Through Title V Permit
7. Permittee shall submit the records of TVP and API gravity testing to the APCO within 45 days after the date of testing. The records shall include the tank identification number, Permit to Operate number, type of stored organic liquid, TVP and API gravity of the organic liquid, test methods used, and a copy of the test results. [District Rule 4623] Federally Enforceable Through Title V Permit
8. The operator shall maintain records that indicate the true vapor pressure (TVP) of the coatings stored, the daily quantity of coatings received into the tank, and the cumulative annual quantity of coatings received into the storage tank. [District Rule 2201, 2520 and 4623] Federally Enforceable Through Title V Permit
9. The operator shall keep an accurate record of each organic liquid stored in each tank, including its storage temperature, TVP, and API gravity. [District Rules 2520 and 4623] Federally Enforceable Through Title V Permit
10. All records shall be retained for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rules 1070, 2520 and 4623] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-2253-21-5

**EXPIRATION DATE:** 10/31/2020

**EQUIPMENT DESCRIPTION:**

SIDE SEAM STRIPE SPRAY OPERATION (LINE #10) SERVED BY ONE SOUDRONIC MODEL AFB 4075 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

## 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 Rule 2201] Federally Enforceable Through Title V Permit
3. The VOC contaminated air stream from the side seam stripe coater, conveyor between the coater and curing tunnel, and curing tunnel shall be vented to the thermal oxidizer at all times except when the thermal oxidizer is undergoing maintenance. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The collection system for fugitive VOC emissions from the side seam stripe coater, conveyor between the coater and curing tunnel, and curing tunnel shall have a minimum overall capture efficiency of 71%. [District Rule 2201] 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 control. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The thermal oxidizer shall be equipped with a continuous temperature monitoring and recording device. [District Rules 2201, 2520 and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
7. The overall VOC capture and control efficiency shall be calculated by multiplying the percent VOC capture efficiency of the collection system by the percent VOC control efficiency of the thermal oxidizer and divide by 100. [District Rules 2201 and 4604] Federally Enforceable Through Title V Permit
8. Three-piece can side seam spray operations shall not use or apply any coating with a VOC content in excess of 660 grams of VOC per liter of coating, as applied, excluding water and exempt compounds. [District Rule 4604] Federally Enforceable Through Title V Permit
9. All solvent cleaning activities shall be performed using solvents with VOC contents not exceeding any of the following limits 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): product cleaning during manufacturing process or surface preparation for coating application: 25 g/l (0.21 lb/gal), repair and maintenance cleaning: 25 g/l (0.21 lb/gal), cleaning of coating application equipment except sheet coater for three-piece cans: 25 g/l (0.21 lb/gal), cleaning of sheet coater for three-piece cans: 550 g/l (4.6 lb/gal) until 9/30/2011 and 250 g/l (2.3 lb/gal) on and after 10/1/2011. [District Rule 4604] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

10. For cleaning of coating application equipment used for sheet coating of three-piece cans, cleaning activities that are performed outside the control of an APCO-approved emission control system that meets the requirements of District Rule 4604 (9/20/07) using solvents with a VOC content greater than 25 g/l (0.21 lb/gallon) shall 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 excessive 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. The discharged solvent from the equipment must be collected into containers without atomizing into the open air. The solvent may be flushed through the system by air or hydraulic pressure, or by pumping. [District Rule 4604] Federally Enforceable Through Title V Permit
11. 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
12. 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
13. 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
14. Only electrostatic, flow, roll, dip, hand application, HVLP, or other application methods with a coating transfer efficiency of at least 65% shall be used. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4604]
15. Coating transfer efficiency shall be measured using a test method pursuant to Section 6.7.4 of Rule 4604 (9/20/07). [District Rule 4604] Federally Enforceable Through Title V Permit
16. The VOC emissions due to coating and solvent usage (from this permit unit) shall not exceed 250 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
17. The PM10 emissions due to coating and solvent usage (from this permit unit) shall not exceed 0.4 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
18. The combined daily VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, and N-2253-21, shall not exceed 250 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
19. The combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, and N-2253-21 shall not exceed 58,579 pounds during any consecutive 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
20. The NOx emission concentration from the thermal oxidizer shall not exceed 0.098 lb/MMBtu of natural gas consumption. [District Rule 2201] Federally Enforceable Through Title V Permit
21. The CO emission concentration from the thermal oxidizer shall not exceed 0.082 lb/MMBtu of natural gas consumption. [District Rule 2201] Federally Enforceable Through Title V Permit
22. The VOC emission concentration from the thermal oxidizer shall not exceed 0.005 lb/MMBtu of natural gas consumption. [District Rule 2201] Federally Enforceable Through Title V Permit
23. The SOx emission concentration from the thermal oxidizer shall not exceed 0.00285 lb/MMBtu of natural gas consumption. [District Rules 2201 and 4801]
24. The PM10 emission concentration from the thermal oxidizer shall not exceed 0.0076 lb/MMBtu of natural gas consumption. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

25. 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 and 4604] Federally Enforceable Through Title V Permit
26. 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 and 4604] Federally Enforceable Through Title V Permit
27. The operator shall source test each collection device to determine the capture efficiency at least once five years. [District Rule 2520] Federally Enforceable Through Title V Permit
28. The capture efficiency of VOC emission collection devices shall be determined according to EPA's "Guidelines for Determining Capture Efficiency," January 9, 1995 and 40 CFR 51, Appendix M, Methods 204-204F, as applicable, or any other method approved by EPA, ARB, and the APCO. [District Rules 2520 and 4604] Federally Enforceable Through Title V Permit
29. The operator shall source test the thermal oxidizer at least once every twelve (12) months to demonstrate compliance with the VOC control efficiency requirements. [District Rule 2201] Federally Enforceable Through Title V Permit
30. 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
31. Source testing of the capture efficiency and control efficiency of VOC emission collection and control devices shall be performed under conditions representative of normal operating conditions and under conditions specified in the Permit-To-Operate. [District Rules 1081 and 2520] Federally Enforceable Through Title V Permit
32. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
33. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
34. 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 and 4604] Federally Enforceable Through Title V Permit
35. 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 combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, N-2253-21 and N-2253-22; (g). The operating temperature of the thermal oxidizer. [District Rules 1070, 2520 and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

36. Records of the date, the time period and the reason that the thermal oxidizer is out of service shall be kept. [District Rules 2201, 2520 and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
37. Records of the combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, N-2253-21 and N-2253-22 shall be kept for any consecutive 12-month period. [District Rules 2201 and 2520] Federally Enforceable Through Title V Permit
38. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 4604] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

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# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-2253-23-2

**EXPIRATION DATE:** 10/31/2020

**EQUIPMENT DESCRIPTION:**

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

## 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 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. Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801 and 17 CCR 93115] Federally Enforceable Through Title V Permit
4. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit
5. Emissions from this IC engine shall not exceed any of the following limits: 5.03 g-NOx/bhp-hr, 2.78 g-CO/bhp-hr, or 0.93 g-VOC/bhp-hr. [District Rule 2201] Federally Enforceable Through Title V Permit
6. PM10 emissions rate shall not exceed 0.25 g/bhp-hr based on US EPA certification using ISO 8178 test procedure. [District Rule 2201] Federally Enforceable Through Title V Permit
7. This engine shall be operated only for testing and maintenance of the engine, required regulatory purposes, and during emergency situations. For testing purposes, the engine shall only be operated the number of hours necessary to comply with the testing requirements of the National Fire Protection Association (NFPA) 25 - "Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems", 2002 edition. Total hours of operation for all maintenance, testing, and required regulatory purposes shall not exceed 100 hours per calendar year. [District Rules 4102, 4701 and 4702, and 17 CCR 93115] Federally Enforceable Through Title V Permit
8. An emergency situation is an unscheduled electrical power outage caused by sudden and reasonably unforeseen natural disasters or sudden and reasonably unforeseen events beyond the control of the permittee. [District Rule 4702] Federally Enforceable Through Title V Permit
9. The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and maintenance operations, and the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.). For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rules 4701 and 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit
10. All records shall be maintained and retained on-site for a minimum of five years, and shall be made available for District inspection upon request. [District Rules 4701 and 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-2253-24-1

**EXPIRATION DATE:** 10/31/2020

**EQUIPMENT DESCRIPTION:**

PORTABLE POWDER COATING OPERATION #1 WITH A SOUDRONIC UNICOAT P-60 POWDER SYSTEM

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. Only powder coatings with a VOC content of 0.0 lb/gal (excluding water and exempt solvents) shall be used. [District Rules 2201 and 4604] Federally Enforceable Through Title V Permit
3. The quantity of powder coating material used by this unit shall not exceed 238 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The PM10 emissions shall not exceed 0.000012 pound per pound of powder coating material used. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Permittee shall keep a daily record of the quantity of powder coating used. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Permittee shall keep a product data sheet or safety data sheet for each powder coating used. [District Rule 2201] Federally Enforceable Through Title V Permit
7. All records shall be retained on-site for a period of five years and made available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Stationary source (as defined in 40 CFR 63.2 - Definitions) emissions shall be less than 10 tons per year of each single hazardous air pollutant (HAP) (as defined in 40 CFR 63.2 - Definitions) and less than 25 tons per year for any combination of HAPs. A year, for this condition, is any consecutive 12 month period based on a monthly rolling total. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The owner/operator shall calculate and maintain records on a monthly basis of the quantity of each HAP emitted into the atmosphere from all sources at the facility. The HAP emissions shall be totaled for a rolling consecutive 12-month period. The records shall include an analysis (or other information) sufficiently detailed to allow the District Personal to make a finding about the source's applicability status with regard to the relevant standard or other requirement. [District Rules 2201 and 2520] Federally Enforceable Through Title V Permit
10. The Permittee shall submit a semi annual summary report of HAP emissions report District. This report shall submitted along with semi-annual monitoring report. The report shall contain the following: (i). the monthly individual HAP and total HAP emissions for the previous 17 months and (ii). the totals for the six 12-consecutive month periods of individual HAP and total HAP emissions (i.e., one for each of the months of the reporting period). [District Rule 2520] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.



# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-2253-25-1

**EXPIRATION DATE:** 10/31/2020

**EQUIPMENT DESCRIPTION:**

PORTABLE POWDER COATING OPERATION #2 WITH A SOUDRONIC UNICOAT P-60 POWDER SYSTEM

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. Only powder coatings with a VOC content of 0.0 lb/gal (excluding water and exempt solvents) shall be used. [District Rules 2201 and 4604] Federally Enforceable Through Title V Permit
3. The quantity of powder coating material used by this unit shall not exceed 238 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The PM10 emissions shall not exceed 0.000012 pound per pound of powder coating material used. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Permittee shall keep a daily record of the quantity of powder coating used. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Permittee shall keep a product data sheet or safety data sheet for each powder coating used. [District Rule 2201] Federally Enforceable Through Title V Permit
7. All records shall be retained on-site for a period of five years and made available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Stationary source (as defined in 40 CFR 63.2 - Definitions) emissions shall be less than 10 tons per year of each single hazardous air pollutant (HAP) (as defined in 40 CFR 63.2 - Definitions) and less than 25 tons per year for any combination of HAPs. A year, for this condition, is any consecutive 12 month period based on a monthly rolling total. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The owner/operator shall calculate and maintain records on a monthly basis of the quantity of each HAP emitted into the atmosphere from all sources at the facility. The HAP emissions shall be totaled for a rolling consecutive 12-month period. The records shall include an analysis (or other information) sufficiently detailed to allow the District Personal to make a finding about the source's applicability status with regard to the relevant standard or other requirement. [District Rules 2201 and 2520] Federally Enforceable Through Title V Permit
10. The Permittee shall submit a semi annual summary report of HAP emissions report District. This report shall submitted along with semi-annual monitoring report. The report shall contain the following: (i). the monthly individual HAP and total HAP emissions for the previous 17 months and (ii). the totals for the six 12-consecutive month periods of individual HAP and total HAP emissions (i.e., one for each of the months of the reporting period). [District Rule 2520] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-2253-26-1

**EXPIRATION DATE:** 10/31/2020

**EQUIPMENT DESCRIPTION:**

PORTABLE POWDER COATING OPERATION #3 WITH A SOUDRONIC UNICOAT P-60 POWDER SYSTEM

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. Only powder coatings with a VOC content of 0.0 lb/gal (excluding water and exempt solvents) shall be used. [District Rules 2201 and 4604] Federally Enforceable Through Title V Permit
3. The quantity of powder coating material used by this unit shall not exceed 238 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The PM10 emissions shall not exceed 0.000012 pound per pound of powder coating material used. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Permittee shall keep a daily record of the quantity of powder coating used. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Permittee shall keep a product data sheet or safety data sheet for each powder coating used. [District Rule 2201] Federally Enforceable Through Title V Permit
7. All records shall be retained on-site for a period of five years and made available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Stationary source (as defined in 40 CFR 63.2 - Definitions) emissions shall be less than 10 tons per year of each single hazardous air pollutant (HAP) (as defined in 40 CFR 63.2 - Definitions) and less than 25 tons per year for any combination of HAPs. A year, for this condition, is any consecutive 12 month period based on a monthly rolling total. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The owner/operator shall calculate and maintain records on a monthly basis of the quantity of each HAP emitted into the atmosphere from all sources at the facility. The HAP emissions shall be totaled for a rolling consecutive 12-month period. The records shall include an analysis (or other information) sufficiently detailed to allow the District Personal to make a finding about the source's applicability status with regard to the relevant standard or other requirement. [District Rules 2201 and 2520] Federally Enforceable Through Title V Permit
10. The Permittee shall submit a semi annual summary report of HAP emissions report District. This report shall submitted along with semi-annual monitoring report. The report shall contain the following: (i). the monthly individual HAP and total HAP emissions for the previous 17 months and (ii). the totals for the six 12-consecutive month periods of individual HAP and total HAP emissions (i.e., one for each of the months of the reporting period). [District Rule 2520] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

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# ATTACHMENT B

Previous Title V Operating Permit

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# San Joaquin Valley Air Pollution Control District

**FACILITY:** N-2253-0-4

**EXPIRATION DATE:** 10/31/2020

## FACILITY-WIDE REQUIREMENTS

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1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1; Stanislaus County Rule 110] Federally Enforceable Through Title V Permit
3. The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0; Stanislaus County Rule 110] Federally Enforceable Through Title V Permit
4. The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0] Federally Enforceable Through Title V Permit
5. Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (12/20/07). [District Rule 2010, 3.0 and 4.0; and 2020] Federally Enforceable Through Title V Permit
6. The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 7.0; 2080; and 2520, 9.8.1 and 9.13.1] Federally Enforceable Through Title V Permit
7. A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District. [District Rule 2031] Federally Enforceable Through Title V Permit
8. Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District. [District Rule 2040]
9. The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit
10. The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings or electronic data. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate. Any amendments to these Facility-wide Requirements that affect specific Permit Units may constitute modification of those Permit Units.

Facility Name: BALL METALPACK (OAKDALE), LLC  
Location: 300 W GREGER ST, OAKDALE, CA 95361-8613  
N-2253-0-4 : Oct 4 2021 5:14PM -- HONGM

11. The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.5.1] Federally Enforceable Through Title V Permit
12. Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520 (6/21/01). [District Rules 2520, 9.5.2 and 1100, 7.0] Federally Enforceable Through Title V Permit
13. If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.7] Federally Enforceable Through Title V Permit
14. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520, 9.8.2] Federally Enforceable Through Title V Permit
15. The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.8.3] Federally Enforceable Through Title V Permit
16. The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.8.4] Federally Enforceable Through Title V Permit
17. The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520, 9.8.5] Federally Enforceable Through Title V Permit
18. The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.9] Federally Enforceable Through Title V Permit
19. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520, 9.13.2.1] Federally Enforceable Through Title V Permit
20. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.13.2.2] Federally Enforceable Through Title V Permit
21. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520, 9.13.2.3] Federally Enforceable Through Title V Permit
22. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520, 9.13.2.4] Federally Enforceable Through Title V Permit
23. 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

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE  
These terms and conditions are part of the Facility-wide Permit to Operate.

24. No person shall manufacture, blend, or repackage for use within the District; or supply, sell, or offer for sale within the District; or solicit for application or apply within the District any architectural coating with a VOC content in excess of the corresponding limit specified in the Table of Standards 1 of District Rule 4601 (12/17/09) or the Table of Standards 2 of District Rule 4601, after the specified effective date in the Table of Standards 1 or the Table of Standards 2. [District Rule 4601, 5.1] Federally Enforceable Through Title V Permit
25. All VOC-containing materials subject to Rule 4601 (12/17/09) shall be stored in closed containers when not in use. [District Rule 4601, 5.4] Federally Enforceable Through Title V Permit
26. The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.3 (12/17/09). [District Rule 4601, 6.1 and 6.3] Federally Enforceable Through Title V Permit
27. With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.13.1 and 10.0] Federally Enforceable Through Title V Permit
28. If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR Part 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit
29. If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR Part 82, Subpart B. [40 CFR Part 82, Subpart B] Federally Enforceable Through Title V Permit
30. Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8021] Federally Enforceable Through Title V Permit
31. Unless specifically exempted under Section 4.0 of Rule 8031 (8/19/04) or Rule 8011 (8/19/04), no person shall perform any outdoor handling, storage, and transport of bulk materials unless the appropriate requirements in Table 8031-1 of Rule 8031 are sufficiently implemented to limit Visible Dust Emissions (VDE) to 20% opacity or to comply with the conditions for a stabilized surface as defined in Rule 8011. [District Rules 8031 and 8011] Federally Enforceable Through Title V Permit
32. An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8041] Federally Enforceable Through Title V Permit
33. Whenever open areas are disturbed, or vehicles are used in open areas, the facility shall comply with the requirements of Section 5.0 of District Rule 8051, unless specifically exempted under Section 4.0 of Rule 8051 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8051] Federally Enforceable Through Title V Permit
34. Any paved road or unpaved road shall comply with the requirements of District Rule 8061 unless specifically exempted under Section 4.0 of Rule 8061 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8061] Federally Enforceable Through Title V Permit
35. Any unpaved vehicle/equipment area that anticipates more than 50 Average annual daily Trips (AADT) shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 150 vehicle trips per day (VDT) shall comply with the requirements of Section 5.1.2 of District Rule 8071. On each day that 25 or more VDT with 3 or more axles will occur on an unpaved vehicle/equipment traffic area, the owner/operator shall comply with the requirements of Section 5.1.3 of District Rule 8071. On each day when a special event will result in 1,000 or more vehicles that will travel/park on an unpaved area, the owner/operator shall comply with the requirements of Section 5.1.4 of District Rule 8071. All sources shall comply with the requirements of Section 5.0 of District Rule 8071 unless specifically exempted under Section 4.0 of Rule 8071 (9/16/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8071] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE  
These terms and conditions are part of the Facility-wide Permit to Operate.

36. On each day that 50 or more vehicle daily trips, or 25 or more vehicle daily trips with 3 or more axles, originates from within and remains exclusively within an unpaved vehicle/equipment traffic area, the owner/operator may apply/reapply water to limit VDE to 20% opacity. The owner/operator shall restrict access and periodically stabilize a disturbed surface area whenever a site becomes inactive to comply with the conditions for a stabilized surface as defined in Rule 8011, unless specifically exempted under Section 4.0 of Rule 8071 (9/16/04) or Rule 8011 (8/19/04). [District Rules 8071 and Rule 8011] Federally Enforceable Through Title V Permit
37. Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation). [40 CFR 61 Subpart M] Federally Enforceable Through Title V Permit
38. The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit
39. The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V Permit
40. When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit
41. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following outdated SIP requirements: Rule 110 (Stanislaus). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
42. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (2/17/05); 4601, sections 5.1, 5.2, 5.3, and 5.8 (12/17/09); 8021 (8/19/04); 8031 (8/19/04); 8041 (8/19/04); 8051 (8/19/04); 8061 (8/19/04); and 8071 (9/16/04). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
43. When applicable to 40 CFR Part 68, a subject facility shall submit to the proper authority a Risk Management Plan when mandated by the regulation. [40 CFR Part 68] Federally Enforceable Through Title V Permit
44. Any person that operates a VOC emission control system subject to the provisions of Section 5.2 of District Rule 4604 (9/20/07) shall submit to the APCO for approval an Operation and Maintenance (O/M) plan. The O/M Plan shall specify actions to be taken to satisfy the requirements of District Rule 4604, Section 5.2 and shall include the following: values or range of acceptable values for key system operating parameter(s); procedures for preventive and corrective maintenance performed; procedures for collecting and recording required data and other information in a form approved by the APCO; burner maintenance schedule; catalyst maintenance and maintenance schedule, if applicable; duct inspection schedule; procedures for revising the O/M Plan; and other information necessary to verify compliance with applicable provisions of Rule 4604. The O/M Plan shall be updated prior to any planned change in operation of the VOC emission control system. [District Rule 4604, 5.2.7 and 6.5] Federally Enforceable Through Title V Permit
45. Stationary source (as defined in 40 CFR 63.2 - Definitions) emissions shall be less than 10 tons per year of each single hazardous air pollutant (HAP) (as defined in 40 CFR 63.2 - Definitions) and less than 25 tons per year for any combination of HAPs. A year, for this condition, is any consecutive 12 month period based on a monthly rolling total. [District NSR Rule] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE  
These terms and conditions are part of the Facility-wide Permit to Operate.

46. The owner/operator shall calculate and maintain records on a monthly basis of the quantity of each HAP emitted into the atmosphere from all sources at the facility. The HAP emissions shall be totaled for a rolling consecutive 12-month period. The records shall include an analysis (or other information) sufficiently detailed to allow the District Personal to make a finding about the source's applicability status with regard to the relevant standard or other requirement. [District NSR Rule and District Rule 2520 9.3.2] Federally Enforceable Through Title V Permit
47. The Permittee shall submit a semi annual summary report of HAP emissions report District. This report shall submitted along with semi-annual monitoring report. The report shall contain the following: (i). the monthly individual HAP and total HAP emissions for the previous 17 months and (ii). the totals for the six 12-consecutive month periods of individual HAP and total HAP emissions (i.e., one for each of the months of the reporting period). [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
48. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report are based upon December 1 of each year, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days of the end of the reporting period. [District Rule 2520, 9.5] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.



# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-2253-1-8

**EXPIRATION DATE:** 10/31/2020

**EQUIPMENT DESCRIPTION:**

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

## PERMIT UNIT REQUIREMENTS

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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 Rule 2201] Federally Enforceable Through Title V Permit
3. The VOC contaminated air stream from the side seam stripe coater, conveyor between the coater and curing tunnel, and curing tunnel shall be vented to the thermal oxidizer at all times except when the thermal oxidizer is undergoing maintenance. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The collection system for fugitive VOC emissions from the side seam stripe coater, conveyor between the coater and curing tunnel, and curing tunnel shall have a minimum overall capture efficiency of 71%. [District Rule 2201] 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 control. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The thermal oxidizer shall be equipped with a continuous temperature monitoring and recording device. [District NSR Rule, Rules 2520, 9.3.2, 4604, 6.3 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
7. The overall VOC capture and control efficiency shall be calculated by multiplying the percent VOC capture efficiency of the collection system by the percent VOC control efficiency of the thermal oxidizer and divide by 100. [District NSR Rule and Rule 4604, 6.7.2.3] Federally Enforceable Through Title V Permit
8. Three-piece can side seam spray operations shall not use or apply any coating with a VOC content in excess of 660 grams of VOC per liter of coating, as applied, excluding water and exempt compounds. [District Rule 4604, 5.1] Federally Enforceable Through Title V Permit
9. All solvent cleaning activities shall be performed using solvents with VOC contents not exceeding any of the following limits 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): product cleaning during manufacturing process or surface preparation for coating application: 25 g/l (0.21 lb/gal), repair and maintenance cleaning: 25 g/l (0.21 lb/gal), cleaning of coating application equipment except sheet coater for three-piece cans: 25 g/l (0.21 lb/gal), cleaning of sheet coater for three-piece cans: 550 g/l (4.6 lb/gal) until 9/30/2011 and 250 g/l (2.3 lb/gal) on and after 10/1/2011. [District Rule 4604, 5.4] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

10. For cleaning of coating application equipment used for sheet coating of three-piece cans, cleaning activities that are performed outside the control of an APCO-approved emission control system that meets the requirements of District Rule 4604 (9/20/07) using solvents with a VOC content greater than 25 g/l (0.21 lb/gallon) shall 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 excessive 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. The discharged solvent from the equipment must be collected into containers without atomizing into the open air. The solvent may be flushed through the system by air or hydraulic pressure, or by pumping. [District Rule 4604, 5.4] Federally Enforceable Through Title V Permit
11. 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, 5.4.5] Federally Enforceable Through Title V Permit
12. 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, 5.4.6] Federally Enforceable Through Title V Permit
13. 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, 5.5] Federally Enforceable Through Title V Permit
14. Only electrostatic, flow, roll, dip, hand application, HVLP, or other application methods with a coating transfer efficiency of at least 65% shall be used. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4604, 5.6.2]
15. Coating transfer efficiency shall be measured using a test method pursuant to Section 6.7.4 of Rule 4604 (9/20/07). [District Rule 4604, 5.6.2.7] Federally Enforceable Through Title V Permit
16. The VOC emissions due to coating and solvent usage (from this permit unit) shall not exceed 250 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
17. The PM10 emissions due to coating and solvent usage (from this permit unit) shall not exceed 0.4 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
18. The combined daily VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, and N-2253-21 shall not exceed 250 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
19. The combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, N-2253-21, and N-2253-22 shall not exceed 58,579 pounds during any consecutive 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
20. The NO<sub>x</sub> emission concentration from the thermal oxidizer shall not exceed 0.098 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
21. The CO emission concentration from the thermal oxidizer shall not exceed 0.082 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
22. The VOC emission concentration from the thermal oxidizer shall not exceed 0.005 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
23. The SO<sub>x</sub> emission concentration from the thermal oxidizer shall not exceed 0.00285 lb/MMBtu of natural gas consumption. [District NSR Rule and Rule 4801, 3.1]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

24. The PM10 emission concentration from the thermal oxidizer shall not exceed 0.0076 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
25. 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, 6.7.1.1] Federally Enforceable Through Title V Permit
26. 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, 6.7.1.2] Federally Enforceable Through Title V Permit
27. The operator shall source test each collection device to determine the capture efficiency at least once five years. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
28. The capture efficiency of VOC emission collection devices shall be determined according to EPA's "Guidelines for Determining Capture Efficiency," January 9, 1995 and 40 CFR 51, Appendix M, Methods 204-204F, as applicable, or any other method approved by EPA, ARB, and the APCO. [District Rules 2520, 9.3.2 and 4604, 6.7.2.1] Federally Enforceable Through Title V Permit
29. The operator shall source test the thermal oxidizer at least once every twelve (12) months to demonstrate compliance with the VOC control efficiency requirements. [District Rule 2201] Federally Enforceable Through Title V Permit
30. 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, 6.7.2.2] Federally Enforceable Through Title V Permit
31. Source testing of the capture efficiency and control efficiency of VOC emission collection and control devices shall be performed under conditions representative of normal operating conditions and under conditions specified in the Permit-To-Operate. [District Rules 1081 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
32. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
33. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
34. 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, 6.1, 6.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

35. 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 combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, N-2253-21 and N-2253-22; (g). The operating temperature of the thermal oxidizer. [District Rules 1070, 2520, 9.3.2 and 4604, 6.1, 6.2 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
36. Records of the date, the time period and the reason that the thermal oxidizer is out of service shall be kept. [District NSR Rule, Rules 2520, 9.3.2, 4604, 5.2.2, 6.3 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
37. Records of the combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, N-2253-21, and N-2253-22 shall be kept for any consecutive 12-month period. [District Rules 2201 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
38. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 4604, 6.2, 6.3, and 6.4] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-2253-2-8

**EXPIRATION DATE:** 10/31/2020

**EQUIPMENT DESCRIPTION:**

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

## PERMIT UNIT REQUIREMENTS

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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 Rule 2201] Federally Enforceable Through Title V Permit
3. The VOC contaminated air stream from the side seam stripe coater, conveyor between the coater and curing tunnel, and curing tunnel shall be vented to the thermal oxidizer at all times except when the thermal oxidizer is undergoing maintenance. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The collection system for fugitive VOC emissions from the side seam stripe coater, conveyor between the coater and curing tunnel, and curing tunnel shall have a minimum overall capture efficiency of 71%. [District Rule 2201] 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 control. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The thermal oxidizer shall be equipped with a continuous temperature monitoring and recording device. [District NSR Rule, Rules 2520, 9.3.2, 4604, 6.3 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
7. The overall VOC capture and control efficiency shall be calculated by multiplying the percent VOC capture efficiency of the collection system by the percent VOC control efficiency of the thermal oxidizer and divide by 100. [District NSR Rule and Rule 4604, 6.7.2.3] Federally Enforceable Through Title V Permit
8. Three-piece can side seam spray operations shall not use or apply any coating with a VOC content in excess of 660 grams of VOC per liter of coating, as applied, excluding water and exempt compounds. [District Rule 4604, 5.1] Federally Enforceable Through Title V Permit
9. All solvent cleaning activities shall be performed using solvents with VOC contents not exceeding any of the following limits 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): product cleaning during manufacturing process or surface preparation for coating application: 25 g/l (0.21 lb/gal), repair and maintenance cleaning: 25 g/l (0.21 lb/gal), cleaning of coating application equipment except sheet coater for three-piece cans: 25 g/l (0.21 lb/gal), cleaning of sheet coater for three-piece cans: 550 g/l (4.6 lb/gal) until 9/30/2011 and 250 g/l (2.3 lb/gal) on and after 10/1/2011. [District Rule 4604, 5.4] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

10. For cleaning of coating application equipment used for sheet coating of three-piece cans, cleaning activities that are performed outside the control of an APCO-approved emission control system that meets the requirements of District Rule 4604 (9/20/07) using solvents with a VOC content greater than 25 g/l (0.21 lb/gallon) shall 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 excessive 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. The discharged solvent from the equipment must be collected into containers without atomizing into the open air. The solvent may be flushed through the system by air or hydraulic pressure, or by pumping. [District Rule 4604, 5.4] Federally Enforceable Through Title V Permit
11. 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, 5.4.5] Federally Enforceable Through Title V Permit
12. 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, 5.4.6] Federally Enforceable Through Title V Permit
13. 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, 5.5] Federally Enforceable Through Title V Permit
14. Only electrostatic, flow, roll, dip, hand application, HVLP, or other application methods with a coating transfer efficiency of at least 65% shall be used. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4604, 5.6.2]
15. Coating transfer efficiency shall be measured using a test method pursuant to Section 6.7.4 of Rule 4604 (9/20/07). [District Rule 4604, 5.6.2.7] Federally Enforceable Through Title V Permit
16. The VOC emissions due to coating and solvent usage (from this permit unit) shall not exceed 250 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
17. The PM10 emissions due to coating and solvent usage (from this permit unit) shall not exceed 0.4 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
18. The combined daily VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, and N-2253-21 shall not exceed 250 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
19. The combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, N-2253-21, and N-2253-22 shall not exceed 58,579 pounds during any consecutive 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
20. The NO<sub>x</sub> emission concentration from the thermal oxidizer shall not exceed 0.098 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
21. The CO emission concentration from the thermal oxidizer shall not exceed 0.082 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
22. The VOC emission concentration from the thermal oxidizer shall not exceed 0.005 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
23. The SO<sub>x</sub> emission concentration from the thermal oxidizer shall not exceed 0.00285 lb/MMBtu of natural gas consumption. [District NSR Rule and Rule 4801, 3.1]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

24. The PM10 emission concentration from the thermal oxidizer shall not exceed 0.0076 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
25. 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, 6.7.1.1] Federally Enforceable Through Title V Permit
26. 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, 6.7.1.2] Federally Enforceable Through Title V Permit
27. The operator shall source test each collection device to determine the capture efficiency at least once five years. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
28. The capture efficiency of VOC emission collection devices shall be determined according to EPA's "Guidelines for Determining Capture Efficiency," January 9, 1995 and 40 CFR 51, Appendix M, Methods 204-204F, as applicable, or any other method approved by EPA, ARB, and the APCO. [District Rules 2520, 9.3.2 and 4604, 6.7.2.1] Federally Enforceable Through Title V Permit
29. The operator shall source test the thermal oxidizer at least once every twelve (12) months to demonstrate compliance with the VOC control efficiency requirements. [District Rule 2201] Federally Enforceable Through Title V Permit
30. 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, 6.7.2.2] Federally Enforceable Through Title V Permit
31. Source testing of the capture efficiency and control efficiency of VOC emission collection and control devices shall be performed under conditions representative of normal operating conditions and under conditions specified in the Permit-To-Operate. [District Rules 1081 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
32. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
33. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
34. 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, 6.1, 6.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

35. 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 combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, N-2253-21 and N-2253-22; (g). The operating temperature of the thermal oxidizer. [District Rules 1070, 2520, 9.3.2 and 4604, 6.1, 6.2 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
36. Records of the date, the time period and the reason that the thermal oxidizer is out of service shall be kept. [District NSR Rule, Rules 2520, 9.3.2, 4604, 5.2.2, 6.3 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
37. Records of the combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, N-2253-21, and N-2253-22 shall be kept for any consecutive 12-month period. [District Rules 2201 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
38. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 4604, 6.2, 6.3, and 6.4] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.



# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-2253-3-8

**EXPIRATION DATE:** 10/31/2020

**EQUIPMENT DESCRIPTION:**

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

## PERMIT UNIT REQUIREMENTS

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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 Rule 2201] Federally Enforceable Through Title V Permit
3. The VOC contaminated air stream from the side seam stripe coater, conveyor between the coater and curing tunnel, and curing tunnel shall be vented to the thermal oxidizer at all times except when the thermal oxidizer is undergoing maintenance. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The collection system for fugitive VOC emissions from the side seam stripe coater, conveyor between the coater and curing tunnel, and curing tunnel shall have a minimum overall capture efficiency of 71%. [District Rule 2201] 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 control. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The thermal oxidizer shall be equipped with a continuous temperature monitoring and recording device. [District NSR Rule, Rules 2520, 9.3.2, 4604, 6.3 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
7. The overall VOC capture and control efficiency shall be calculated by multiplying the percent VOC capture efficiency of the collection system by the percent VOC control efficiency of the thermal oxidizer and divide by 100. [District NSR Rule and Rule 4604, 6.7.2.3] Federally Enforceable Through Title V Permit
8. Three-piece can side seam spray operations shall not use or apply any coating with a VOC content in excess of 660 grams of VOC per liter of coating, as applied, excluding water and exempt compounds. [District Rule 4604, 5.1] Federally Enforceable Through Title V Permit
9. All solvent cleaning activities shall be performed using solvents with VOC contents not exceeding any of the following limits 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): product cleaning during manufacturing process or surface preparation for coating application: 25 g/l (0.21 lb/gal), repair and maintenance cleaning: 25 g/l (0.21 lb/gal), cleaning of coating application equipment except sheet coater for three-piece cans: 25 g/l (0.21 lb/gal), cleaning of sheet coater for three-piece cans: 550 g/l (4.6 lb/gal) until 9/30/2011 and 250 g/l (2.3 lb/gal) on and after 10/1/2011. [District Rule 4604, 5.4] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

10. For cleaning of coating application equipment used for sheet coating of three-piece cans, cleaning activities that are performed outside the control of an APCO-approved emission control system that meets the requirements of District Rule 4604 (9/20/07) using solvents with a VOC content greater than 25 g/l (0.21 lb/gallon) shall 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 excessive 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. The discharged solvent from the equipment must be collected into containers without atomizing into the open air. The solvent may be flushed through the system by air or hydraulic pressure, or by pumping. [District Rule 4604, 5.4] Federally Enforceable Through Title V Permit
11. 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, 5.4.5] Federally Enforceable Through Title V Permit
12. 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, 5.4.6] Federally Enforceable Through Title V Permit
13. 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, 5.5] Federally Enforceable Through Title V Permit
14. Only electrostatic, flow, roll, dip, hand application, HVLP, or other application methods with a coating transfer efficiency of at least 65% shall be used. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4604, 5.6.2]
15. Coating transfer efficiency shall be measured using a test method pursuant to Section 6.7.4 of Rule 4604 (9/20/07). [District Rule 4604, 5.6.2.7] Federally Enforceable Through Title V Permit
16. The VOC emissions due to coating and solvent usage (from this permit unit) shall not exceed 250 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
17. The PM10 emissions due to coating and solvent usage (from this permit unit) shall not exceed 0.4 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
18. The combined daily VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, and N-2253-21 shall not exceed 250 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
19. The combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, N-2253-21, and N-2253-22 shall not exceed 58,579 pounds during any consecutive 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
20. The NO<sub>x</sub> emission concentration from the thermal oxidizer shall not exceed 0.098 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
21. The CO emission concentration from the thermal oxidizer shall not exceed 0.082 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
22. The VOC emission concentration from the thermal oxidizer shall not exceed 0.005 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
23. The SO<sub>x</sub> emission concentration from the thermal oxidizer shall not exceed 0.00285 lb/MMBtu of natural gas consumption. [District NSR Rule and Rule 4801, 3.1]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

24. The PM10 emission concentration from the thermal oxidizer shall not exceed 0.0076 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
25. 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, 6.7.1.1] Federally Enforceable Through Title V Permit
26. 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, 6.7.1.2] Federally Enforceable Through Title V Permit
27. The operator shall source test each collection device to determine the capture efficiency at least once five years. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
28. The capture efficiency of VOC emission collection devices shall be determined according to EPA's "Guidelines for Determining Capture Efficiency," January 9, 1995 and 40 CFR 51, Appendix M, Methods 204-204F, as applicable, or any other method approved by EPA, ARB, and the APCO. [District Rules 2520, 9.3.2 and 4604, 6.7.2.1] Federally Enforceable Through Title V Permit
29. The operator shall source test the thermal oxidizer at least once every twelve (12) months to demonstrate compliance with the VOC control efficiency requirements. [District Rule 2201] Federally Enforceable Through Title V Permit
30. 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, 6.7.2.2] Federally Enforceable Through Title V Permit
31. Source testing of the capture efficiency and control efficiency of VOC emission collection and control devices shall be performed under conditions representative of normal operating conditions and under conditions specified in the Permit-To-Operate. [District Rules 1081 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
32. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
33. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
34. 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, 6.1, 6.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

35. 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 combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, N-2253-21 and N-2253-22; (g). The operating temperature of the thermal oxidizer. [District Rules 1070, 2520, 9.3.2 and 4604, 6.1, 6.2 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
36. Records of the date, the time period and the reason that the thermal oxidizer is out of service shall be kept. [District NSR Rule, Rules 2520, 9.3.2, 4604, 5.2.2, 6.3 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
37. Records of the combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, N-2253-21, and N-2253-22 shall be kept for any consecutive 12-month period. [District Rules 2201 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
38. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 4604, 6.2, 6.3, and 6.4] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-2253-4-8

**EXPIRATION DATE:** 10/31/2020

**EQUIPMENT DESCRIPTION:**

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

## PERMIT UNIT REQUIREMENTS

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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 Rule 2201] Federally Enforceable Through Title V Permit
3. The VOC contaminated air stream from the side seam stripe coater, conveyor between the coater and curing tunnel, and curing tunnel shall be vented to the thermal oxidizer at all times except when the thermal oxidizer is undergoing maintenance. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The collection system for fugitive VOC emissions from the side seam stripe coater, conveyor between the coater and curing tunnel, and curing tunnel shall have a minimum overall capture efficiency of 71%. [District Rule 2201] 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 control. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The thermal oxidizer shall be equipped with a continuous temperature monitoring and recording device. [District NSR Rule, Rules 2520, 9.3.2, 4604, 6.3 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
7. The overall VOC capture and control efficiency shall be calculated by multiplying the percent VOC capture efficiency of the collection system by the percent VOC control efficiency of the thermal oxidizer and divide by 100. [District NSR Rule and Rule 4604, 6.7.2.3] Federally Enforceable Through Title V Permit
8. Three-piece can side seam spray operations shall not use or apply any coating with a VOC content in excess of 660 grams of VOC per liter of coating, as applied, excluding water and exempt compounds. [District Rule 4604, 5.1] Federally Enforceable Through Title V Permit
9. All solvent cleaning activities shall be performed using solvents with VOC contents not exceeding any of the following limits 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): product cleaning during manufacturing process or surface preparation for coating application: 25 g/l (0.21 lb/gal), repair and maintenance cleaning: 25 g/l (0.21 lb/gal), cleaning of coating application equipment except sheet coater for three-piece cans: 25 g/l (0.21 lb/gal), cleaning of sheet coater for three-piece cans: 550 g/l (4.6 lb/gal) until 9/30/2011 and 250 g/l (2.3 lb/gal) on and after 10/1/2011. [District Rule 4604, 5.4] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

10. For cleaning of coating application equipment used for sheet coating of three-piece cans, cleaning activities that are performed outside the control of an APCO-approved emission control system that meets the requirements of District Rule 4604 (9/20/07) using solvents with a VOC content greater than 25 g/l (0.21 lb/gallon) shall 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 excessive 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. The discharged solvent from the equipment must be collected into containers without atomizing into the open air. The solvent may be flushed through the system by air or hydraulic pressure, or by pumping. [District Rule 4604, 5.4] Federally Enforceable Through Title V Permit
11. 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, 5.4.5] Federally Enforceable Through Title V Permit
12. 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, 5.4.6] Federally Enforceable Through Title V Permit
13. 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, 5.5] Federally Enforceable Through Title V Permit
14. Only electrostatic, flow, roll, dip, hand application, HVLP, or other application methods with a coating transfer efficiency of at least 65% shall be used. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4604, 5.6.2]
15. Coating transfer efficiency shall be measured using a test method pursuant to Section 6.7.4 of Rule 4604 (9/20/07). [District Rule 4604, 5.6.2.7] Federally Enforceable Through Title V Permit
16. The VOC emissions due to coating and solvent usage (from this permit unit) shall not exceed 250 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
17. The PM10 emissions due to coating and solvent usage (from this permit unit) shall not exceed 0.4 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
18. The combined daily VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, and N-2253-21 shall not exceed 250 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
19. The combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, N-2253-21, and N-2253-22 shall not exceed 58,579 pounds during any consecutive 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
20. The NO<sub>x</sub> emission concentration from the thermal oxidizer shall not exceed 0.098 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
21. The CO emission concentration from the thermal oxidizer shall not exceed 0.082 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
22. The VOC emission concentration from the thermal oxidizer shall not exceed 0.005 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
23. The SO<sub>x</sub> emission concentration from the thermal oxidizer shall not exceed 0.00285 lb/MMBtu of natural gas consumption. [District NSR Rule and Rule 4801, 3.1]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

24. The PM10 emission concentration from the thermal oxidizer shall not exceed 0.0076 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
25. 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, 6.7.1.1] Federally Enforceable Through Title V Permit
26. 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, 6.7.1.2] Federally Enforceable Through Title V Permit
27. The operator shall source test each collection device to determine the capture efficiency at least once five years. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
28. The capture efficiency of VOC emission collection devices shall be determined according to EPA's "Guidelines for Determining Capture Efficiency," January 9, 1995 and 40 CFR 51, Appendix M, Methods 204-204F, as applicable, or any other method approved by EPA, ARB, and the APCO. [District Rules 2520, 9.3.2 and 4604, 6.7.2.1] Federally Enforceable Through Title V Permit
29. The operator shall source test the thermal oxidizer at least once every twelve (12) months to demonstrate compliance with the VOC control efficiency requirements. [District Rule 2201] Federally Enforceable Through Title V Permit
30. 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, 6.7.2.2] Federally Enforceable Through Title V Permit
31. Source testing of the capture efficiency and control efficiency of VOC emission collection and control devices shall be performed under conditions representative of normal operating conditions and under conditions specified in the Permit-To-Operate. [District Rules 1081 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
32. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
33. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
34. 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, 6.1, 6.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

35. 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 combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, N-2253-21 and N-2253-22; (g). The operating temperature of the thermal oxidizer. [District Rules 1070, 2520, 9.3.2 and 4604, 6.1, 6.2 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
36. Records of the date, the time period and the reason that the thermal oxidizer is out of service shall be kept. [District NSR Rule, Rules 2520, 9.3.2, 4604, 5.2.2, 6.3 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
37. Records of the combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, N-2253-21, and N-2253-22 shall be kept for any consecutive 12-month period. [District Rules 2201 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
38. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 4604, 6.2, 6.3, and 6.4] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.



# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-2253-6-8

**EXPIRATION DATE:** 10/31/2020

**EQUIPMENT DESCRIPTION:**

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

## PERMIT UNIT REQUIREMENTS

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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 Rule 2201] Federally Enforceable Through Title V Permit
3. The VOC contaminated air stream from the side seam stripe coater, conveyor between the coater and curing tunnel, and curing tunnel shall be vented to the thermal oxidizer at all times except when the thermal oxidizer is undergoing maintenance. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The collection system for fugitive VOC emissions from the side seam stripe coater, conveyor between the coater and curing tunnel, and curing tunnel shall have a minimum overall capture efficiency of 71%. [District Rule 2201] 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 control. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The thermal oxidizer shall be equipped with a continuous temperature monitoring and recording device. [District NSR Rule, Rules 2520, 9.3.2, 4604, 6.3 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
7. The overall VOC capture and control efficiency shall be calculated by multiplying the percent VOC capture efficiency of the collection system by the percent VOC control efficiency of the thermal oxidizer and divide by 100. [District NSR Rule and Rule 4604, 6.7.2.3] Federally Enforceable Through Title V Permit
8. Three-piece can side seam spray operations shall not use or apply any coating with a VOC content in excess of 660 grams of VOC per liter of coating, as applied, excluding water and exempt compounds. [District Rule 4604, 5.1] Federally Enforceable Through Title V Permit
9. All solvent cleaning activities shall be performed using solvents with VOC contents not exceeding any of the following limits 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): product cleaning during manufacturing process or surface preparation for coating application: 25 g/l (0.21 lb/gal), repair and maintenance cleaning: 25 g/l (0.21 lb/gal), cleaning of coating application equipment except sheet coater for three-piece cans: 25 g/l (0.21 lb/gal), cleaning of sheet coater for three-piece cans: 550 g/l (4.6 lb/gal) until 9/30/2011 and 250 g/l (2.3 lb/gal) on and after 10/1/2011. [District Rule 4604, 5.4] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

10. For cleaning of coating application equipment used for sheet coating of three-piece cans, cleaning activities that are performed outside the control of an APCO-approved emission control system that meets the requirements of District Rule 4604 (9/20/07) using solvents with a VOC content greater than 25 g/l (0.21 lb/gallon) shall 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 excessive 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. The discharged solvent from the equipment must be collected into containers without atomizing into the open air. The solvent may be flushed through the system by air or hydraulic pressure, or by pumping. [District Rule 4604, 5.4] Federally Enforceable Through Title V Permit
11. 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, 5.4.5] Federally Enforceable Through Title V Permit
12. 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, 5.4.6] Federally Enforceable Through Title V Permit
13. 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, 5.5] Federally Enforceable Through Title V Permit
14. Only electrostatic, flow, roll, dip, hand application, HVLP, or other application methods with a coating transfer efficiency of at least 65% shall be used. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4604, 5.6.2]
15. Coating transfer efficiency shall be measured using a test method pursuant to Section 6.7.4 of Rule 4604 (9/20/07). [District Rule 4604, 5.6.2.7] Federally Enforceable Through Title V Permit
16. The VOC emissions due to coating and solvent usage (from this permit unit) shall not exceed 250 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
17. The PM10 emissions due to coating and solvent usage (from this permit unit) shall not exceed 0.4 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
18. The combined daily VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, and N-2253-21 shall not exceed 250 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
19. The combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, N-2253-21, and N-2253-22 shall not exceed 58,579 pounds during any consecutive 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
20. The NO<sub>x</sub> emission concentration from the thermal oxidizer shall not exceed 0.098 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
21. The CO emission concentration from the thermal oxidizer shall not exceed 0.082 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
22. The VOC emission concentration from the thermal oxidizer shall not exceed 0.005 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
23. The SO<sub>x</sub> emission concentration from the thermal oxidizer shall not exceed 0.00285 lb/MMBtu of natural gas consumption. [District NSR Rule and Rule 4801, 3.1]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

24. The PM10 emission concentration from the thermal oxidizer shall not exceed 0.0076 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
25. 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, 6.7.1.1] Federally Enforceable Through Title V Permit
26. 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, 6.7.1.2] Federally Enforceable Through Title V Permit
27. The operator shall source test each collection device to determine the capture efficiency at least once five years. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
28. The capture efficiency of VOC emission collection devices shall be determined according to EPA's "Guidelines for Determining Capture Efficiency," January 9, 1995 and 40 CFR 51, Appendix M, Methods 204-204F, as applicable, or any other method approved by EPA, ARB, and the APCO. [District Rules 2520, 9.3.2 and 4604, 6.7.2.1] Federally Enforceable Through Title V Permit
29. The operator shall source test the thermal oxidizer at least once every twelve (12) months to demonstrate compliance with the VOC control efficiency requirements. [District Rule 2201] Federally Enforceable Through Title V Permit
30. 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, 6.7.2.2] Federally Enforceable Through Title V Permit
31. Source testing of the capture efficiency and control efficiency of VOC emission collection and control devices shall be performed under conditions representative of normal operating conditions and under conditions specified in the Permit-To-Operate. [District Rules 1081 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
32. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
33. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
34. 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, 6.1, 6.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

35. 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 combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, N-2253-21 and N-2253-22; (g). The operating temperature of the thermal oxidizer. [District Rules 1070, 2520, 9.3.2 and 4604, 6.1, 6.2 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
36. Records of the date, the time period and the reason that the thermal oxidizer is out of service shall be kept. [District NSR Rule, Rules 2520, 9.3.2, 4604, 5.2.2, 6.3 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
37. Records of the combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, N-2253-21, and N-2253-22 shall be kept for any consecutive 12-month period. [District Rules 2201 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
38. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 4604, 6.2, 6.3, and 6.4] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-2253-7-8

**EXPIRATION DATE:** 10/31/2020

**EQUIPMENT DESCRIPTION:**

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

## PERMIT UNIT REQUIREMENTS

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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 Rule 2201] Federally Enforceable Through Title V Permit
3. The VOC contaminated air stream from the side seam stripe coater, conveyor between the coater and curing tunnel, and curing tunnel shall be vented to the thermal oxidizer at all times except when the thermal oxidizer is undergoing maintenance. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The collection system for fugitive VOC emissions from the side seam stripe coater, conveyor between the coater and curing tunnel, and curing tunnel shall have a minimum overall capture efficiency of 71%. [District Rule 2201] 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 control. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The thermal oxidizer shall be equipped with a continuous temperature monitoring and recording device. [District NSR Rule, Rules 2520, 9.3.2, 4604, 6.3 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
7. The overall VOC capture and control efficiency shall be calculated by multiplying the percent VOC capture efficiency of the collection system by the percent VOC control efficiency of the thermal oxidizer and divide by 100. [District NSR Rule and Rule 4604, 6.7.2.3] Federally Enforceable Through Title V Permit
8. Three-piece can side seam spray operations shall not use or apply any coating with a VOC content in excess of 660 grams of VOC per liter of coating, as applied, excluding water and exempt compounds. [District Rule 4604, 5.1] Federally Enforceable Through Title V Permit
9. All solvent cleaning activities shall be performed using solvents with VOC contents not exceeding any of the following limits 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): product cleaning during manufacturing process or surface preparation for coating application: 25 g/l (0.21 lb/gal), repair and maintenance cleaning: 25 g/l (0.21 lb/gal), cleaning of coating application equipment except sheet coater for three-piece cans: 25 g/l (0.21 lb/gal), cleaning of sheet coater for three-piece cans: 550 g/l (4.6 lb/gal) until 9/30/2011 and 250 g/l (2.3 lb/gal) on and after 10/1/2011. [District Rule 4604, 5.4] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

10. For cleaning of coating application equipment used for sheet coating of three-piece cans, cleaning activities that are performed outside the control of an APCO-approved emission control system that meets the requirements of District Rule 4604 (9/20/07) using solvents with a VOC content greater than 25 g/l (0.21 lb/gallon) shall 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 excessive 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. The discharged solvent from the equipment must be collected into containers without atomizing into the open air. The solvent may be flushed through the system by air or hydraulic pressure, or by pumping. [District Rule 4604, 5.4] Federally Enforceable Through Title V Permit
11. 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, 5.4.5] Federally Enforceable Through Title V Permit
12. 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, 5.4.6] Federally Enforceable Through Title V Permit
13. 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, 5.5] Federally Enforceable Through Title V Permit
14. Only electrostatic, flow, roll, dip, hand application, HVLP, or other application methods with a coating transfer efficiency of at least 65% shall be used. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4604, 5.6.2]
15. Coating transfer efficiency shall be measured using a test method pursuant to Section 6.7.4 of Rule 4604 (9/20/07). [District Rule 4604, 5.6.2.7] Federally Enforceable Through Title V Permit
16. The VOC emissions due to coating and solvent usage (from this permit unit) shall not exceed 250 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
17. The PM10 emissions due to coating and solvent usage (from this permit unit) shall not exceed 0.4 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
18. The combined daily VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, and N-2253-21 shall not exceed 250 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
19. The combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, N-2253-21, and N-2253-22 shall not exceed 58,579 pounds during any consecutive 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
20. The NO<sub>x</sub> emission concentration from the thermal oxidizer shall not exceed 0.098 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
21. The CO emission concentration from the thermal oxidizer shall not exceed 0.082 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
22. The VOC emission concentration from the thermal oxidizer shall not exceed 0.005 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
23. The SO<sub>x</sub> emission concentration from the thermal oxidizer shall not exceed 0.00285 lb/MMBtu of natural gas consumption. [District NSR Rule and Rule 4801, 3.1]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

24. The PM10 emission concentration from the thermal oxidizer shall not exceed 0.0076 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
25. 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, 6.7.1.1] Federally Enforceable Through Title V Permit
26. 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, 6.7.1.2] Federally Enforceable Through Title V Permit
27. The operator shall source test each collection device to determine the capture efficiency at least once five years. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
28. The capture efficiency of VOC emission collection devices shall be determined according to EPA's "Guidelines for Determining Capture Efficiency," January 9, 1995 and 40 CFR 51, Appendix M, Methods 204-204F, as applicable, or any other method approved by EPA, ARB, and the APCO. [District Rules 2520, 9.3.2 and 4604, 6.7.2.1] Federally Enforceable Through Title V Permit
29. The operator shall source test the thermal oxidizer at least once every twelve (12) months to demonstrate compliance with the VOC control efficiency requirements. [District Rule 2201] Federally Enforceable Through Title V Permit
30. 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, 6.7.2.2] Federally Enforceable Through Title V Permit
31. Source testing of the capture efficiency and control efficiency of VOC emission collection and control devices shall be performed under conditions representative of normal operating conditions and under conditions specified in the Permit-To-Operate. [District Rules 1081 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
32. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
33. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
34. 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, 6.1, 6.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

35. 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 combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, N-2253-21 and N-2253-22; (g). The operating temperature of the thermal oxidizer. [District Rules 1070, 2520, 9.3.2 and 4604, 6.1, 6.2 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
36. Records of the date, the time period and the reason that the thermal oxidizer is out of service shall be kept. [District NSR Rule, Rules 2520, 9.3.2, 4604, 5.2.2, 6.3 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
37. Records of the combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, N-2253-21, and N-2253-22 shall be kept for any consecutive 12-month period. [District Rules 2201 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
38. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 4604, 6.2, 6.3, and 6.4] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.



# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-2253-8-8

**EXPIRATION DATE:** 10/31/2020

**EQUIPMENT DESCRIPTION:**

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

## PERMIT UNIT REQUIREMENTS

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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 Rule 2201] Federally Enforceable Through Title V Permit
3. The VOC contaminated air stream from the side seam stripe coater, conveyor between the coater and curing tunnel, and curing tunnel shall be vented to the thermal oxidizer at all times except when the thermal oxidizer is undergoing maintenance. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The collection system for fugitive VOC emissions from the side seam stripe coater, conveyor between the coater and curing tunnel, and curing tunnel shall have a minimum overall capture efficiency of 71%. [District Rule 2201] 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 control. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The thermal oxidizer shall be equipped with a continuous temperature monitoring and recording device. [District NSR Rule, Rules 2520, 9.3.2, 4604, 6.3 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
7. The overall VOC capture and control efficiency shall be calculated by multiplying the percent VOC capture efficiency of the collection system by the percent VOC control efficiency of the thermal oxidizer and divide by 100. [District NSR Rule and Rule 4604, 6.7.2.3] Federally Enforceable Through Title V Permit
8. Three-piece can side seam spray operations shall not use or apply any coating with a VOC content in excess of 660 grams of VOC per liter of coating, as applied, excluding water and exempt compounds. [District Rule 4604, 5.1] Federally Enforceable Through Title V Permit
9. All solvent cleaning activities shall be performed using solvents with VOC contents not exceeding any of the following limits 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): product cleaning during manufacturing process or surface preparation for coating application: 25 g/l (0.21 lb/gal), repair and maintenance cleaning: 25 g/l (0.21 lb/gal), cleaning of coating application equipment except sheet coater for three-piece cans: 25 g/l (0.21 lb/gal), cleaning of sheet coater for three-piece cans: 550 g/l (4.6 lb/gal) until 9/30/2011 and 250 g/l (2.3 lb/gal) on and after 10/1/2011. [District Rule 4604, 5.4] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

10. For cleaning of coating application equipment used for sheet coating of three-piece cans, cleaning activities that are performed outside the control of an APCO-approved emission control system that meets the requirements of District Rule 4604 (9/20/07) using solvents with a VOC content greater than 25 g/l (0.21 lb/gallon) shall 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 excessive 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. The discharged solvent from the equipment must be collected into containers without atomizing into the open air. The solvent may be flushed through the system by air or hydraulic pressure, or by pumping. [District Rule 4604, 5.4] Federally Enforceable Through Title V Permit
11. 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, 5.4.5] Federally Enforceable Through Title V Permit
12. 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, 5.4.6] Federally Enforceable Through Title V Permit
13. 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, 5.5] Federally Enforceable Through Title V Permit
14. Only electrostatic, flow, roll, dip, hand application, HVLP, or other application methods with a coating transfer efficiency of at least 65% shall be used. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4604, 5.6.2]
15. Coating transfer efficiency shall be measured using a test method pursuant to Section 6.7.4 of Rule 4604 (9/20/07). [District Rule 4604, 5.6.2.7] Federally Enforceable Through Title V Permit
16. The VOC emissions due to coating and solvent usage (from this permit unit) shall not exceed 250 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
17. The PM10 emissions due to coating and solvent usage (from this permit unit) shall not exceed 0.4 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
18. The combined daily VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, and N-2253-21 shall not exceed 250 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
19. The combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, N-2253-21, and N-2253-22 shall not exceed 58,579 pounds during any consecutive 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
20. The NO<sub>x</sub> emission concentration from the thermal oxidizer shall not exceed 0.098 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
21. The CO emission concentration from the thermal oxidizer shall not exceed 0.082 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
22. The VOC emission concentration from the thermal oxidizer shall not exceed 0.005 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
23. The SO<sub>x</sub> emission concentration from the thermal oxidizer shall not exceed 0.00285 lb/MMBtu of natural gas consumption. [District NSR Rule and Rule 4801, 3.1]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

24. The PM10 emission concentration from the thermal oxidizer shall not exceed 0.0076 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
25. 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, 6.7.1.1] Federally Enforceable Through Title V Permit
26. 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, 6.7.1.2] Federally Enforceable Through Title V Permit
27. The operator shall source test each collection device to determine the capture efficiency at least once five years. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
28. The capture efficiency of VOC emission collection devices shall be determined according to EPA's "Guidelines for Determining Capture Efficiency," January 9, 1995 and 40 CFR 51, Appendix M, Methods 204-204F, as applicable, or any other method approved by EPA, ARB, and the APCO. [District Rules 2520, 9.3.2 and 4604, 6.7.2.1] Federally Enforceable Through Title V Permit
29. The operator shall source test the thermal oxidizer at least once every twelve (12) months to demonstrate compliance with the VOC control efficiency requirements. [District Rule 2201] Federally Enforceable Through Title V Permit
30. 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, 6.7.2.2] Federally Enforceable Through Title V Permit
31. Source testing of the capture efficiency and control efficiency of VOC emission collection and control devices shall be performed under conditions representative of normal operating conditions and under conditions specified in the Permit-To-Operate. [District Rules 1081 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
32. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
33. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
34. 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, 6.1, 6.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

35. 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 combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, N-2253-21 and N-2253-22; (g). The operating temperature of the thermal oxidizer. [District Rules 1070, 2520, 9.3.2 and 4604, 6.1, 6.2 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
36. Records of the date, the time period and the reason that the thermal oxidizer is out of service shall be kept. [District NSR Rule, Rules 2520, 9.3.2, 4604, 5.2.2, 6.3 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
37. Records of the combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, N-2253-21, and N-2253-22 shall be kept for any consecutive 12-month period. [District Rules 2201 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
38. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 4604, 6.2, 6.3, and 6.4] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-2253-9-8

**EXPIRATION DATE:** 10/31/2020

**EQUIPMENT DESCRIPTION:**

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

## PERMIT UNIT REQUIREMENTS

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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 Rule 2201] Federally Enforceable Through Title V Permit
3. The VOC contaminated air stream from the side seam stripe coater, conveyor between the coater and curing tunnel, and curing tunnel shall be vented to the thermal oxidizer at all times except when the thermal oxidizer is undergoing maintenance. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The collection system for fugitive VOC emissions from the side seam stripe coater, conveyor between the coater and curing tunnel, and curing tunnel shall have a minimum overall capture efficiency of 71%. [District Rule 2201] 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 control. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The thermal oxidizer shall be equipped with a continuous temperature monitoring and recording device. [District NSR Rule, Rules 2520, 9.3.2, 4604, 6.3 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
7. The overall VOC capture and control efficiency shall be calculated by multiplying the percent VOC capture efficiency of the collection system by the percent VOC control efficiency of the thermal oxidizer and divide by 100. [District NSR Rule and Rule 4604, 6.7.2.3] Federally Enforceable Through Title V Permit
8. Three-piece can side seam spray operations shall not use or apply any coating with a VOC content in excess of 660 grams of VOC per liter of coating, as applied, excluding water and exempt compounds. [District Rule 4604, 5.1] Federally Enforceable Through Title V Permit
9. All solvent cleaning activities shall be performed using solvents with VOC contents not exceeding any of the following limits 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): product cleaning during manufacturing process or surface preparation for coating application: 25 g/l (0.21 lb/gal), repair and maintenance cleaning: 25 g/l (0.21 lb/gal), cleaning of coating application equipment except sheet coater for three-piece cans: 25 g/l (0.21 lb/gal), cleaning of sheet coater for three-piece cans: 550 g/l (4.6 lb/gal) until 9/30/2011 and 250 g/l (2.3 lb/gal) on and after 10/1/2011. [District Rule 4604, 5.4] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

10. For cleaning of coating application equipment used for sheet coating of three-piece cans, cleaning activities that are performed outside the control of an APCO-approved emission control system that meets the requirements of District Rule 4604 (9/20/07) using solvents with a VOC content greater than 25 g/l (0.21 lb/gallon) shall 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 excessive 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. The discharged solvent from the equipment must be collected into containers without atomizing into the open air. The solvent may be flushed through the system by air or hydraulic pressure, or by pumping. [District Rule 4604, 5.4] Federally Enforceable Through Title V Permit
11. 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, 5.4.5] Federally Enforceable Through Title V Permit
12. 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, 5.4.6] Federally Enforceable Through Title V Permit
13. 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, 5.5] Federally Enforceable Through Title V Permit
14. Only electrostatic, flow, roll, dip, hand application, HVLP, or other application methods with a coating transfer efficiency of at least 65% shall be used. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4604, 5.6.2]
15. Coating transfer efficiency shall be measured using a test method pursuant to Section 6.7.4 of Rule 4604 (9/20/07). [District Rule 4604, 5.6.2.7] Federally Enforceable Through Title V Permit
16. The VOC emissions due to coating and solvent usage (from this permit unit) shall not exceed 250 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
17. The PM10 emissions due to coating and solvent usage (from this permit unit) shall not exceed 0.4 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
18. The combined daily VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, and N-2253-21 shall not exceed 250 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
19. The combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, N-2253-21, and N-2253-22 shall not exceed 58,579 pounds during any consecutive 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
20. The NO<sub>x</sub> emission concentration from the thermal oxidizer shall not exceed 0.098 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
21. The CO emission concentration from the thermal oxidizer shall not exceed 0.082 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
22. The VOC emission concentration from the thermal oxidizer shall not exceed 0.005 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
23. The SO<sub>x</sub> emission concentration from the thermal oxidizer shall not exceed 0.00285 lb/MMBtu of natural gas consumption. [District NSR Rule and Rule 4801, 3.1]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

24. The PM10 emission concentration from the thermal oxidizer shall not exceed 0.0076 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
25. 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, 6.7.1.1] Federally Enforceable Through Title V Permit
26. 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, 6.7.1.2] Federally Enforceable Through Title V Permit
27. The operator shall source test each collection device to determine the capture efficiency at least once five years. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
28. The capture efficiency of VOC emission collection devices shall be determined according to EPA's "Guidelines for Determining Capture Efficiency," January 9, 1995 and 40 CFR 51, Appendix M, Methods 204-204F, as applicable, or any other method approved by EPA, ARB, and the APCO. [District Rules 2520, 9.3.2 and 4604, 6.7.2.1] Federally Enforceable Through Title V Permit
29. The operator shall source test the thermal oxidizer at least once every twelve (12) months to demonstrate compliance with the VOC control efficiency requirements. [District Rule 2201] Federally Enforceable Through Title V Permit
30. 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, 6.7.2.2] Federally Enforceable Through Title V Permit
31. Source testing of the capture efficiency and control efficiency of VOC emission collection and control devices shall be performed under conditions representative of normal operating conditions and under conditions specified in the Permit-To-Operate. [District Rules 1081 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
32. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
33. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
34. 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, 6.1, 6.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

35. 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 combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, N-2253-21 and N-2253-22; (g). The operating temperature of the thermal oxidizer. [District Rules 1070, 2520, 9.3.2 and 4604, 6.1, 6.2 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
36. Records of the date, the time period and the reason that the thermal oxidizer is out of service shall be kept. [District NSR Rule, Rules 2520, 9.3.2, 4604, 5.2.2, 6.3 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
37. Records of the combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, N-2253-21, and N-2253-22 shall be kept for any consecutive 12-month period. [District Rules 2201 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
38. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 4604, 6.2, 6.3, and 6.4] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.



# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-2253-15-14

**EXPIRATION DATE:** 10/31/2020

**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

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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

These terms and conditions are part of the Facility-wide Permit to Operate.

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 NO<sub>x</sub> and CO emissions from the curing oven exhaust shall be conducted at least once every 24 months. [District Rules 2201 and 4309]
16. NO<sub>x</sub> 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 (O<sub>2</sub>) 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 NO<sub>x</sub> and CO shall be reported in ppmv @ 19% O<sub>2</sub>, 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 NO<sub>x</sub>, CO, and O<sub>2</sub> 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

These terms and conditions are part of the Facility-wide Permit to Operate.

25. If either the NO<sub>x</sub> or CO concentrations corrected to 19% O<sub>2</sub>, 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 NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 19% O<sub>2</sub>, (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

These terms and conditions are part of the Facility-wide Permit to Operate.

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

These terms and conditions are part of the Facility-wide Permit to Operate.

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-2253-16-14

**EXPIRATION DATE:** 10/31/2020

## **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**

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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

These terms and conditions are part of the Facility-wide Permit to Operate.

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 NO<sub>x</sub> and CO emissions from the curing oven exhaust shall be conducted at least once every 24 months. [District Rules 2201 and 4309]
17. NO<sub>x</sub> 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 (O<sub>2</sub>) 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 NO<sub>x</sub> and CO shall be reported in ppmv @ 19% O<sub>2</sub>, 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 NO<sub>x</sub>, CO, and O<sub>2</sub> 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

These terms and conditions are part of the Facility-wide Permit to Operate.

26. If either the NO<sub>x</sub> or CO concentrations corrected to 19% O<sub>2</sub>, 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 NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 19% O<sub>2</sub>, (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

These terms and conditions are part of the Facility-wide Permit to Operate.

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

These terms and conditions are part of the Facility-wide Permit to Operate.



# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-2253-17-14

**EXPIRATION DATE:** 10/31/2020

**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

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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

These terms and conditions are part of the Facility-wide Permit to Operate.

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 NO<sub>x</sub> and CO emissions from the curing oven exhaust shall be conducted at least once every 24 months. [District Rules 2201 and 4309]
16. NO<sub>x</sub> 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 (O<sub>2</sub>) 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 NO<sub>x</sub> and CO shall be reported in ppmv @ 19% O<sub>2</sub>, 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 NO<sub>x</sub>, CO, and O<sub>2</sub> 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

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25. If either the NO<sub>x</sub> or CO concentrations corrected to 19% O<sub>2</sub>, 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 NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 19% O<sub>2</sub>, (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

These terms and conditions are part of the Facility-wide Permit to Operate.

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

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# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-2253-18-9

**EXPIRATION DATE:** 10/31/2020

**EQUIPMENT DESCRIPTION:**

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

## PERMIT UNIT REQUIREMENTS

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1. 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] Federally Enforceable Through Title V Permit
2. 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, 5.4] Federally Enforceable Through Title V Permit
3. 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, 5.4.5] Federally Enforceable Through Title V Permit
4. 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, 5.4.6] Federally Enforceable Through Title V Permit
5. 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, 5.5] Federally Enforceable Through Title V Permit
6. The VOC emissions due to coating and solvent use shall not exceed 0.2 pounds during any one day. [District NSR Rule] Federally Enforceable Through Title V Permit
7. 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
8. 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 for any consecutive 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

9. 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, 6.7.1.1] Federally Enforceable Through Title V Permit
10. 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, 6.7.1.2] Federally Enforceable Through Title V Permit
11. 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, 6.1, 6.2]] Federally Enforceable Through Title V Permit
12. 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. [District Rules 1070, 2520, 9.3.2 and 4604, 6.1, 6.2] Federally Enforceable Through Title V Permit
13. 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
14. Records of the combined annual 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 NSR Rule] Federally Enforceable Through Title V Permit
15. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 4604, 6.2 and 6.3] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-2253-19-5

**EXPIRATION DATE:** 10/31/2020

**EQUIPMENT DESCRIPTION:**

COATING STORAGE TANK #1 CONSISTING OF ONE 8,000 GALLON ABOVEGROUND VERTICAL FIXED ROOF STORAGE TANK

## PERMIT UNIT REQUIREMENTS

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1. The maximum amount of coatings received into the storage tank shall not exceed 8,000 gallons in any one day and 416,000 gallons in any one calendar year. [District NSR Rule] Federally Enforceable Through Title V Permit
2. The VOC emission rate from the receiving and storage of the coatings shall not exceed 0.6 lb VOC/day and 27 lb VOC/year. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Organic liquids that are received, stored, or held in this tank shall have a true vapor pressure (TVP) less than 0.5 psia under all storage conditions. [District Rule 4623, 4.4] Federally Enforceable Through Title V Permit
4. Permittee shall conduct true vapor pressure (TVP) testing of the organic liquid stored in this tank at least once every 24 months during the summer (July - September), and/or whenever there is a change in the source or type of organic liquid stored in this tank. In lieu of testing each tank, the permittee may conduct TVP testing of a representative tank provided the requirements of District Rule 4623 (amended 5/19/05), Section 6.2 are satisfied. TVP testing shall not be required for tanks that exclusively store organic liquids listed in Appendix A of District Rule 4623, provided the storage temperature indicated in Appendix A is not exceeded at any time. [District Rule 4623, 6.2.2] Federally Enforceable Through Title V Permit
5. The TVP testing shall be conducted at actual storage temperature of the organic liquid in the tank. [District Rule 4623, 6.2.2] Federally Enforceable Through Title V Permit
6. The TVP of any organic liquid, except for crude oil, shall be determined by measuring the Reid Vapor Pressure (RVP) using ASTM D 323 (Test Method for Vapor Pressure for Petroleum Products), and converting the RVP to TVP at the tank's maximum organic liquid storage temperature. The conversion of RVP to TVP shall be done in accordance with the procedures in Appendix B. Appendix B is an excerpt from the oil and gas section of "ARB Technical Guidance Document to the Criteria and Guidelines Regulation for AB 2588", dated August 1989. [District Rule 4623, 6.4.3] Federally Enforceable Through Title V Permit
7. Permittee shall submit the records of TVP and API gravity testing to the APCO within 45 days after the date of testing. The records shall include the tank identification number, Permit to Operate number, type of stored organic liquid, TVP and API gravity of the organic liquid, test methods used, and a copy of the test results. [District Rule 4623, 6.3.6] Federally Enforceable Through Title V Permit
8. The operator shall maintain records that indicate the true vapor pressure (TVP) of the coatings stored, the daily quantity of coatings received into the tank, and the cumulative annual quantity of coatings received into the storage tank. [District NSR Rule, District Rules 2520, 9.3.2 and 4623, 6.3] Federally Enforceable Through Title V Permit
9. The operator shall keep an accurate record of each organic liquid stored in each tank, including its storage temperature, TVP, and API gravity. [District Rules 2520, 9.3.2 and 4623, 6.3.1] Federally Enforceable Through Title V Permit
10. All records shall be retained for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rules 1070, 2520, 9.4.2 and 4623, 6.3] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-2253-20-5

**EXPIRATION DATE:** 10/31/2020

**EQUIPMENT DESCRIPTION:**

COATING STORAGE TANK #2 CONSISTING OF ONE 8,000 GALLON ABOVEGROUND VERTICAL FIXED ROOF STORAGE TANK

## PERMIT UNIT REQUIREMENTS

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1. The maximum amount of coatings received into the storage tank shall not exceed 8,000 gallons in any one day and 416,000 gallons in any one calendar year. [District NSR Rule] Federally Enforceable Through Title V Permit
2. The VOC emission rate from the receiving and storage of the coatings shall not exceed 0.6 lb VOC/day and 27 lb VOC/year. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Organic liquids that are received, stored, or held in this tank shall have a true vapor pressure (TVP) less than 0.5 psia under all storage conditions. [District Rule 4623, 4.4] Federally Enforceable Through Title V Permit
4. Permittee shall conduct true vapor pressure (TVP) testing of the organic liquid stored in this tank at least once every 24 months during summer (July - September), and/or whenever there is a change in the source or type of organic liquid stored in this tank. In lieu of testing each tank, the permittee may conduct TVP testing of a representative tank provided the requirements of District Rule 4623 (amended 5/19/05), Section 6.2 are satisfied. TVP testing shall not be required for tanks that exclusively store organic liquids listed in Appendix A of District Rule 4623, provided the storage temperature indicated in Appendix A is not exceeded at any time. [District Rule 4623, 6.2.2] Federally Enforceable Through Title V Permit
5. The TVP testing shall be conducted at actual storage temperature of the organic liquid in the tank. [District Rule 4623, 6.2.2] Federally Enforceable Through Title V Permit
6. The TVP of any organic liquid, except for crude oil, shall be determined by measuring the Reid Vapor Pressure (RVP) using ASTM D 323 (Test Method for Vapor Pressure for Petroleum Products), and converting the RVP to TVP at the tank's maximum organic liquid storage temperature. The conversion of RVP to TVP shall be done in accordance with the procedures in Appendix B. Appendix B is an excerpt from the oil and gas section of "ARB Technical Guidance Document to the Criteria and Guidelines Regulation for AB 2588", dated August 1989. [District Rule 4623, 6.4.3] Federally Enforceable Through Title V Permit
7. Permittee shall submit the records of TVP and API gravity testing to the APCO within 45 days after the date of testing. The records shall include the tank identification number, Permit to Operate number, type of stored organic liquid, TVP and API gravity of the organic liquid, test methods used, and a copy of the test results. [District Rule 4623, 6.3.6] Federally Enforceable Through Title V Permit
8. The operator shall maintain records that indicate the true vapor pressure (TVP) of the coatings stored, the daily quantity of coatings received into the tank, and the cumulative annual quantity of coatings received into the storage tank. [District NSR Rule, District Rules 2520, 9.3.2 and 4623, 6.3] Federally Enforceable Through Title V Permit
9. The operator shall keep an accurate record of each organic liquid stored in each tank, including its storage temperature, TVP, and API gravity. [District Rules 2520, 9.3.2 and 4623, 6.3.1] Federally Enforceable Through Title V Permit
10. All records shall be retained for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rules 1070, 2520, 9.4.2 and 4623, 6.3] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.



# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-2253-21-4

**EXPIRATION DATE:** 10/31/2020

**EQUIPMENT DESCRIPTION:**

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

## PERMIT UNIT REQUIREMENTS

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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 Rule 2201] Federally Enforceable Through Title V Permit
3. The VOC contaminated air stream from the side seam stripe coater, conveyor between the coater and curing tunnel, and curing tunnel shall be vented to the thermal oxidizer at all times except when the thermal oxidizer is undergoing maintenance. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The collection system for fugitive VOC emissions from the side seam stripe coater, conveyor between the coater and curing tunnel, and curing tunnel shall have a minimum overall capture efficiency of 71%. [District Rule 2201] 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 control. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The thermal oxidizer shall be equipped with a continuous temperature monitoring and recording device. [District NSR Rule, Rules 2520, 9.3.2, 4604, 6.3 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
7. The overall VOC capture and control efficiency shall be calculated by multiplying the percent VOC capture efficiency of the collection system by the percent VOC control efficiency of the thermal oxidizer and divide by 100. [District NSR Rule and Rule 4604, 6.7.2.3] Federally Enforceable Through Title V Permit
8. Three-piece can side seam spray operations shall not use or apply any coating with a VOC content in excess of 660 grams of VOC per liter of coating, as applied, excluding water and exempt compounds. [District Rule 4604, 5.1] Federally Enforceable Through Title V Permit
9. All solvent cleaning activities shall be performed using solvents with VOC contents not exceeding any of the following limits 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): product cleaning during manufacturing process or surface preparation for coating application: 25 g/l (0.21 lb/gal), repair and maintenance cleaning: 25 g/l (0.21 lb/gal), cleaning of coating application equipment except sheet coater for three-piece cans: 25 g/l (0.21 lb/gal), cleaning of sheet coater for three-piece cans: 550 g/l (4.6 lb/gal) until 9/30/2011 and 250 g/l (2.3 lb/gal) on and after 10/1/2011. [District Rule 4604, 5.4] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

10. For cleaning of coating application equipment used for sheet coating of three-piece cans, cleaning activities that are performed outside the control of an APCO-approved emission control system that meets the requirements of District Rule 4604 (9/20/07) using solvents with a VOC content greater than 25 g/l (0.21 lb/gallon) shall 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 excessive 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. The discharged solvent from the equipment must be collected into containers without atomizing into the open air. The solvent may be flushed through the system by air or hydraulic pressure, or by pumping. [District Rule 4604, 5.4] Federally Enforceable Through Title V Permit
11. 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, 5.4.5] Federally Enforceable Through Title V Permit
12. 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, 5.4.6] Federally Enforceable Through Title V Permit
13. 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, 5.5] Federally Enforceable Through Title V Permit
14. Only electrostatic, flow, roll, dip, hand application, HVLP, or other application methods with a coating transfer efficiency of at least 65% shall be used. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4604, 5.6.2]
15. Coating transfer efficiency shall be measured using a test method pursuant to Section 6.7.4 of Rule 4604 (9/20/07). [District Rule 4604, 5.6.2.7] Federally Enforceable Through Title V Permit
16. The VOC emissions due to coating and solvent usage (from this permit unit) shall not exceed 250 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
17. The PM10 emissions due to coating and solvent usage (from this permit unit) shall not exceed 0.4 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
18. The combined daily VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, and N-2253-21, shall not exceed 250 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
19. The combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, and N-2253-21, shall not exceed 58,579 pounds during any consecutive 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
20. The NO<sub>x</sub> emission concentration from the thermal oxidizer shall not exceed 0.098 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
21. The CO emission concentration from the thermal oxidizer shall not exceed 0.082 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
22. The VOC emission concentration from the thermal oxidizer shall not exceed 0.005 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
23. The SO<sub>x</sub> emission concentration from the thermal oxidizer shall not exceed 0.00285 lb/MMBtu of natural gas consumption. [District NSR Rule and Rule 4801, 3.1]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

24. The PM10 emission concentration from the thermal oxidizer shall not exceed 0.0076 lb/MMBtu of natural gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
25. 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, 6.7.1.1] Federally Enforceable Through Title V Permit
26. 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, 6.7.1.2] Federally Enforceable Through Title V Permit
27. The operator shall source test each collection device to determine the capture efficiency at least once five years. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
28. The capture efficiency of VOC emission collection devices shall be determined according to EPA's "Guidelines for Determining Capture Efficiency," January 9, 1995 and 40 CFR 51, Appendix M, Methods 204-204F, as applicable, or any other method approved by EPA, ARB, and the APCO. [District Rules 2520, 9.3.2 and 4604, 6.7.2.1] Federally Enforceable Through Title V Permit
29. The operator shall source test the thermal oxidizer at least once every twelve (12) months to demonstrate compliance with the VOC control efficiency requirements. [District Rule 2201] Federally Enforceable Through Title V Permit
30. 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, 6.7.2.2] Federally Enforceable Through Title V Permit
31. Source testing of the capture efficiency and control efficiency of VOC emission collection and control devices shall be performed under conditions representative of normal operating conditions and under conditions specified in the Permit-To-Operate. [District Rules 1081 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
32. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
33. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
34. 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, 6.1, 6.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

35. 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 combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, N-2253-21 and N-2253-22; (g). The operating temperature of the thermal oxidizer. [District Rules 1070, 2520, 9.3.2 and 4604, 6.1, 6.2 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
36. Records of the date, the time period and the reason that the thermal oxidizer is out of service shall be kept. [District NSR Rule, Rules 2520, 9.3.2, 4604, 5.2.2, 6.3 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
37. Records of the combined VOC emissions from the equipment operating under permits N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-6, N-2253-7, N-2253-8, N-2253-9, N-2253-21 and N-2253-22 shall be kept for any consecutive 12-month period. [District Rules 2201 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
38. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 4604, 6.2, 6.3, and 6.4] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-2253-23-1

**EXPIRATION DATE:** 10/31/2020

**EQUIPMENT DESCRIPTION:**

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

## PERMIT UNIT REQUIREMENTS

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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 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] Federally Enforceable Through Title V Permit
3. Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801 and 17 CCR 93115] Federally Enforceable Through Title V Permit
4. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit
5. Emissions from this IC engine shall not exceed any of the following limits: 5.03 g-NOx/bhp-hr, 2.78 g-CO/bhp-hr, or 0.93 g-VOC/bhp-hr. [District Rule 2201] Federally Enforceable Through Title V Permit
6. PM10 emissions rate shall not exceed 0.25 g/bhp-hr based on US EPA certification using ISO 8178 test procedure. [District Rule 2201] Federally Enforceable Through Title V Permit
7. This engine shall be operated only for testing and maintenance of the engine, required regulatory purposes, and during emergency situations. For testing purposes, the engine shall only be operated the number of hours necessary to comply with the testing requirements of the National Fire Protection Association (NFPA) 25 - "Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems", 2002 edition. Total hours of operation for all maintenance, testing, and required regulatory purposes shall not exceed 100 hours per calendar year. [District Rules 4102, 4701, 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit
8. An emergency situation is an unscheduled electrical power outage caused by sudden and reasonably unforeseen natural disasters or sudden and reasonably unforeseen events beyond the control of the permittee. [District Rule 4702] Federally Enforceable Through Title V Permit
9. The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and maintenance operations, and the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.). For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rules 4701, 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit
10. All records shall be maintained and retained on-site for a minimum of five years, and shall be made available for District inspection upon request. [District Rules 4701, 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

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# ATTACHMENT C

Detailed Summary List of Facility Permits

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### Detailed Facility Report

For Facility=2253

Sorted by Facility Name and Permit Number

<b>BALL METALPACK (OAKDALE), LLC</b> <b>300 W GREGER ST</b> <b>OAKDALE, CA 95361-8613</b>	FAC # STATUS: TELEPHONE:	<b>N 2253</b> <b>A</b>	TYPE: TOXIC ID:	<b>TitleV</b> <b>11097</b>	EXPIRE ON: AREA: INSP. DATE:	10/31/2020 3 / 03/22
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PERMIT NUMBER	FEE DESCRIPTION	FEE RULE	QTY	FEE AMOUNT	FEE TOTAL	PERMIT STATUS	EQUIPMENT DESCRIPTION
N-2253-1-8	615 KBtu/hr	3020-02 C	1	239.00	239.00	A	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
N-2253-2-8	615 KBtu/hr	3020-02 C	1	239.00	239.00	A	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
N-2253-3-8	615 KBtu/hr	3020-02 C	1	239.00	239.00	A	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
N-2253-4-8	615 KBtu/hr	3020-02 C	1	239.00	239.00	A	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
N-2253-5-2	8,600 KBtu/hr	3020-02 G	1	980.00	980.00	D	SIDE SEAM STRIPE SPRAY OPERATION (LINE #5) SERVED BY ONE SOUNDRONIC MODEL FBB BODYMAKER AND ONE 0.6 MMBTU/HR FLYNN AERO FLAME AF-9 CURING TUNNEL. THE CURING TUNNEL IS SERVED BY AN 8 MMBTU/HR SMITH THERMAL OXIDIZER. THE THERMAL OXIDIZER SERVES THE OVENS OPERATING UNDER N-2253-1, N-2253-2, N-2253-3, N-2253-4, N-2253-5, N-2253-6, N-2253-7, N-2253-8 AND N-2253-9, THE NON-UV COATING UNITS AND THE SHARED OVENS OPERATING UNDER N-2253-15, N-2253-16 AND N-2253-17 WHICH MAY ALSO SERVE N-2253-18.
N-2253-6-8	615 KBtu/hr	3020-02 C	1	239.00	239.00	A	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
N-2253-7-8	615 KBtu/hr	3020-02 C	1	239.00	239.00	A	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
N-2253-8-8	615 KBtu/hr	3020-02 C	1	239.00	239.00	A	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

**Detailed Facility Report**

For Facility=2253

Sorted by Facility Name and Permit Number

PERMIT NUMBER	FEE DESCRIPTION	FEE RULE	QTY	FEE AMOUNT	FEE TOTAL	PERMIT STATUS	EQUIPMENT DESCRIPTION
N-2253-9-8	615 KBtu/hr	3020-02 C	1	239.00	239.00	A	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
N-2253-10-0	860 KBTU/HR (TOTAL)	3020-02 D	1	379.00	379.00	D	LINE #10 - SOUDRONIC MODEL # FBB BODYMAKER, SIDE STRIPE SPRAY UNIT, SARDEE MODEL # SLIX-30 SIDE STRIPE CURING TUNNEL AND ASSOCIATED EQUIPMENT. THIS UNIT IS SERVED BY A THERMAL OXIDIZER WHICH IS COMMON TO PERMIT UNITS N-2253-1 THROUGH N-2253-10.
N-2253-15-14	9,215 KBtu/hr	3020-02 G	1	980.00	980.00	A	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-2253-16-14	4,608 KBtu/hr	3020-02 F	1	731.00	731.00	A	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-2253-17-14	9,215 KBtu/hr	3020-02 G	1	980.00	980.00	A	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
N-2253-18-9	4,608 KBtu/hr	3020-02 F	1	731.00	731.00	A	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
N-2253-19-5	8,000 Gallon Aboveground Storage Tank	3020-05 B	1	113.00	113.00	A	COATING STORAGE TANK #1 CONSISTING OF ONE 8,000 GALLON ABOVEGROUND VERTICAL FIXED ROOF STORAGE TANK
N-2253-20-5	8,000 Gallon Aboveground Storage Tank	3020-05 B	1	113.00	113.00	A	COATING STORAGE TANK #2 CONSISTING OF ONE 8,000 GALLON ABOVEGROUND VERTICAL FIXED ROOF STORAGE TANK
N-2253-21-4	615 KBtu/hr	3020-02 C	1	239.00	239.00	A	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



### Detailed Facility Report

For Facility=2253

Sorted by Facility Name and Permit Number

PERMIT NUMBER	FEE DESCRIPTION	FEE RULE	QTY	FEE AMOUNT	FEE TOTAL	PERMIT STATUS	EQUIPMENT DESCRIPTION
N-2253-22-2	571 kBtu/hr	3020-02 C	1	239.00	239.00	D	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
N-2253-23-1	240 bhp	3020-10 C	1	290.00	290.00	A	240 BHP CUMMINS MODEL 6CTA8.3-F1 DIESEL-FUELED EMERGENCY STANDBY INTERNAL COMBUSTION ENGINE POWERING A FIREWATER PUMP

Number of Facilities Reported: 1

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# ATTACHMENT D

Authorities to Construct N-2253-24-0 through '-26-0

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# AUTHORITY TO CONSTRUCT

**PERMIT NO:** N-2253-24-0

**ISSUANCE DATE:** 10/04/2017

**LEGAL OWNER OR OPERATOR:** BALL METAL FOOD CONTAINER (OAKDALE) LLC.

**MAILING ADDRESS:** P O BOX 589  
BROOMFIELD, CO 80038-0589

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

**EQUIPMENT DESCRIPTION:**  
PORTABLE POWDER COATING OPERATION #1 WITH A SOUDRONIC UNICOAT P-60 POWDER SYSTEM

## CONDITIONS

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
3. 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 as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
4. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
5. Only powder coatings with a VOC content of 0.0 lb/gal (excluding water and exempt solvents) shall be used. [District Rules 2201 and 4604]
6. The quantity of powder coating material used by this unit shall not exceed 238 pounds in any one day. [District Rule 2201]
7. The PM10 emissions shall not exceed 0.000012 pound per pound of powder coating material used. [District Rule 2201]
8. Permittee shall keep a daily record of the quantity of powder coating used. [District Rule 2201]
9. Permittee shall keep a product data sheet or safety data sheet for each powder coating used. [District Rule 2201]
10. All records shall be retained on-site for a period of five years and made available for District inspection upon request. [District Rule 2201]

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

  
Arnaud Marjollet, Director of Permit Services

N-2253-24-0 Oct 4 2017 4:23PM - HARADERJ : Joint Inspection NOT Required

11. Stationary source (as defined in 40 CFR 63.2 - Definitions) emissions shall be less than 10 tons per year of each single hazardous air pollutant (HAP) (as defined in 40 CFR 63.2 - Definitions) and less than 25 tons per year for any combination of HAPs. A year, for this condition, is any consecutive 12 month period based on a monthly rolling total. [District NSR Rule]
12. The owner/operator shall calculate and maintain records on a monthly basis of the quantity of each HAP emitted into the atmosphere from all sources at the facility. The HAP emissions shall be totaled for a rolling consecutive 12-month period. The records shall include an analysis (or other information) sufficiently detailed to allow the District Personal to make a finding about the source's applicability status with regard to the relevant standard or other requirement. [District NSR Rule and District Rule 2520 9.3.2]
13. The Permittee shall submit a semi annual summary report of HAP emissions report District. This report shall submitted along with semi-annual monitoring report. The report shall contain the following: (i). the monthly individual HAP and total HAP emissions for the previous 17 months and (ii). the totals for the six 12-consecutive month periods of individual HAP and total HAP emissions (i.e., one for each of the months of the reporting period). [District Rule 2520, 9.3.2]



## AUTHORITY TO CONSTRUCT

**PERMIT NO:** N-2253-25-0

**ISSUANCE DATE:** 10/04/2017

**LEGAL OWNER OR OPERATOR:** BALL METAL FOOD CONTAINER (OAKDALE) LLC.

**MAILING ADDRESS:** P O BOX 589  
BROOMFIELD, CO 80038-0589

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

**EQUIPMENT DESCRIPTION:**  
PORTABLE POWDER COATING OPERATION #2 WITH A SOUDRONIC UNICOAT P-60 POWDER SYSTEM

### CONDITIONS

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
3. 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 as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
4. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
5. Only powder coatings with a VOC content of 0.0 lb/gal (excluding water and exempt solvents) shall be used. [District Rules 2201 and 4604]
6. The quantity of powder coating material used by this unit shall not exceed 238 pounds in any one day. [District Rule 2201]
7. The PM10 emissions shall not exceed 0.000012 pound per pound of powder coating material used. [District Rule 2201]
8. Permittee shall keep a daily record of the quantity of powder coating used. [District Rule 2201]
9. Permittee shall keep a product data sheet or safety data sheet for each powder coating used. [District Rule 2201]
10. All records shall be retained on-site for a period of five years and made available for District inspection upon request. [District Rule 2201]

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

  
Arnaud Marjollet, Director of Permit Services

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11. Stationary source (as defined in 40 CFR 63.2 - Definitions) emissions shall be less than 10 tons per year of each single hazardous air pollutant (HAP) (as defined in 40 CFR 63.2 - Definitions) and less than 25 tons per year for any combination of HAPs. A year, for this condition, is any consecutive 12 month period based on a monthly rolling total. [District NSR Rule]
12. The owner/operator shall calculate and maintain records on a monthly basis of the quantity of each HAP emitted into the atmosphere from all sources at the facility. The HAP emissions shall be totaled for a rolling consecutive 12-month period. The records shall include an analysis (or other information) sufficiently detailed to allow the District Personal to make a finding about the source's applicability status with regard to the relevant standard or other requirement. [District NSR Rule and District Rule 2520 9.3.2]
13. The Permittee shall submit a semi annual summary report of HAP emissions report District. This report shall submitted along with semi-annual monitoring report. The report shall contain the following: (i). the monthly individual HAP and total HAP emissions for the previous 17 months and (ii). the totals for the six 12-consecutive month periods of individual HAP and total HAP emissions (i.e., one for each of the months of the reporting period). [District Rule 2520, 9.3.2]



# AUTHORITY TO CONSTRUCT

**PERMIT NO:** N-2253-26-0

**ISSUANCE DATE:** 10/04/2017

**LEGAL OWNER OR OPERATOR:** BALL METAL FOOD CONTAINER (OAKDALE) LLC.

**MAILING ADDRESS:** P O BOX 589  
BROOMFIELD, CO 80038-0589

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

**EQUIPMENT DESCRIPTION:**  
PORTABLE POWDER COATING OPERATION #3 WITH A SOUDRONIC UNICOAT P-60 POWDER SYSTEM

## CONDITIONS

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
3. 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 as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
4. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
5. Only powder coatings with a VOC content of 0.0 lb/gal (excluding water and exempt solvents) shall be used. [District Rules 2201 and 4604]
6. The quantity of powder coating material used by this unit shall not exceed 238 pounds in any one day. [District Rule 2201]
7. The PM10 emissions shall not exceed 0.000012 pound per pound of powder coating material used. [District Rule 2201]
8. Permittee shall keep a daily record of the quantity of powder coating used. [District Rule 2201]
9. Permittee shall keep a product data sheet or safety data sheet for each powder coating used. [District Rule 2201]
10. All records shall be retained on-site for a period of five years and made available for District inspection upon request. [District Rule 2201]

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

  
Arnaud Marjollet, Director of Permit Services

N-2253-26-0 Oct 4 2017 4:23PM - HARADERJ Joint Inspection NOT Required

11. Stationary source (as defined in 40 CFR 63.2 - Definitions) emissions shall be less than 10 tons per year of each single hazardous air pollutant (HAP) (as defined in 40 CFR 63.2 - Definitions) and less than 25 tons per year for any combination of HAPs. A year, for this condition, is any consecutive 12 month period based on a monthly rolling total. [District NSR Rule]
12. The owner/operator shall calculate and maintain records on a monthly basis of the quantity of each HAP emitted into the atmosphere from all sources at the facility. The HAP emissions shall be totaled for a rolling consecutive 12-month period. The records shall include an analysis (or other information) sufficiently detailed to allow the District Personal to make a finding about the source's applicability status with regard to the relevant standard or other requirement. [District NSR Rule and District Rule 2520 9.3.2]
13. The Permittee shall submit a semi annual summary report of HAP emissions report District. This report shall submitted along with semi-annual monitoring report. The report shall contain the following: (i). the monthly individual HAP and total HAP emissions for the previous 17 months and (ii). the totals for the six 12-consecutive month periods of individual HAP and total HAP emissions (i.e., one for each of the months of the reporting period). [District Rule 2520, 9.3.2]