April 26, 2006

Ms. Deborah Jordan Director, Air Management Division **United States Environmental Protection Agency** 75 Hawthorne Street San Francisco, CA 94105

Subject: Minor Revision to Major Facility Review Permit for Facility # A1665

Dear Ms. Jordan:

This is to advise you that the Bay Area Air Quality Management District is proposing a minor revision to the Major Facility Review Permit for the Rexam Beverage Can Company, Facility Number A1665, and is submitting the permit to EPA for review.

ALAMEDA COUNTY Roberta Cooper Scott Haggerty Nate Miley Shelia Young

CONTRA COSTA COUNTY

Mark DeSaulnier Mark Ross (Vice-Chair) Michael Shimansky Gayle B. Uilkema (Chair)

MARIN COUNTY Harold C. Brown, Jr.

NAPA COUNTY Brad Wagenknecht

SAN FRANCISCO COUNTY Chris Dalv

Jake McGoldrick Gavin Newsom

SAN MATEO COUNTY

Jerry Hill (Secretary) Marland Townsend

SANTA CLARA COUNTY

Erin Garner Liz Kniss Patrick Kwok Julia Miller

SOLANO COUNTY John F. Silva JB:BFB:rth

SONOMA COUNTY Tim Smith Pamela Torliatt

Jack P. Broadbent EXECUTIVE OFFICER/APCO The purpose of the proposed permit revision is to lower the temperature requirement for the Direct Flame Afterburner A-1. Rexam has demonstrated by approved source testing that the required VOC destruction efficiency for the beverage can coating operations at the facility can be maintained at a lower afterburner temperature.

The lowering of the required incinerator temperature does not qualify as a significant change or relaxation in monitoring, because, as established by source testing, the same demonstration of compliance with the VOC standards (i.e. \geq 95% control efficiency) is made using either the current (1450 °F) or proposed (1375 °F) minimum incinerator temperature.

This revision is minor pursuant to BAAQMD Regulation 2-6-215 and will be effective immediately. The permit will be formally re-issued after EPA review. This revision is not subject to public comment and therefore, requires no public notice.

A copy of the proposed revisions to the Major Facility Review Permit and the Permit Evaluation/Statement of Basis are enclosed for your review. If you have any questions on this matter, please call **Steve Hill, Air Quality Engineering Manager, at (415) 749-4673.**

Sincerely,

Jack Broadbent Executive Officer/Air Pollution Control Officer

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