

July 18, 2005

Jenkins & Gilchrist, LLP  
12100 Wilshire Blvd  
Los Angeles, CA 90025

Attn: Sonja A. Inglin

Dear Ms. Inglin:

This is in response to your letter dated May 10, 2004, providing comments on behalf of Pechiney Plastic Packaging (Site #A0273) regarding the proposed revision to its Title V Permit.

Your comments and the District's responses are presented below.

1. **Comment:** The violation-reporting requirement (Part 13) identified in Table IV-B is not applicable to S-17 and S-18, and should be deleted from Table IV-B.  
**Response:** The District agrees. The reference to Condition 14373, Part 13 has been deleted.
2. **Comment:** Part 12.f of Condition #14373 should be modified to specify "monthly" calculations of emissions.  
**Response:** The language has been revised to specify "calculation of monthly emissions," which more accurately matches the limits in Parts 9, 10, and 11.
3. **Comment:** The source-testing condition contains language not found in the Stipulation for Withdrawal filed with the Hearing Board. Specifically, the second-to-last sentence includes the phrase "to determine compliance with part 2b of this condition." The District did not offer an explanation for this new phrase. The phrase should be removed.  
**Response:** The phrase was added to clarify that an inlet-outlet source test, if necessary, would be for the purpose of determining compliance with section 2b of the condition. It unambiguously ties the requirement to source test together with the substantive standard against which compliance will be measured. The District considered this clarification to be consistent with the intent of the condition. Other than the fact that it was not included in the stipulation, Pechiney's comment does not explain why it finds the phrase objectionable.
4. **Comment:** Basis for Condition #20229, Parts 1 and 2, should refer to 40 CFR 63.820(a)(2)(i) and (ii).  
**Response:** The District agrees. The basis for these conditions has been

ALAMEDA COUNTY

Roberta Cooper  
Scott Haggerty  
Nate Miley  
Shelia Young

CONTRA COSTA COUNTY

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Mark Ross  
(Secretary)  
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Gayle B. Uilkema  
(Vice-Chairperson)

MARIN COUNTY

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NAPA COUNTY

Brad Wagenknecht

SAN FRANCISCO COUNTY

Chris Daly  
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SAN MATEO COUNTY

Jerry Hill  
Marland Townsend  
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Erin Gerner  
Liz Kniss  
Patrick Kwok  
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SOLANO COUNTY

John F. Silva

SONOMA COUNTY

Tim Smith  
Pamela Torliatt

Jack P. Broadbent  
EXECUTIVE OFFICER/APCO

- revised, for the reasons stated in the comment.
5. **Comment:** Reference to Part 2 of Condition #14373 in Table VII-A should be changed to Part 4.  
**Response:** The District agrees. The change has been made, for the reasons stated in the comment.
  6. **Comment:** Reference to Part 10 of Condition #14373 in Table VII-C should be changed to Part 9.  
**Response:** The District agrees. The change has been made, for the reasons stated in the comment.
  7. **Comment:** Reference to Part 6 of Condition #15238 in Table VII-E should be changed to Part 5.  
**Response:** The District agrees. The change has been made, for the reasons stated in the comment.
  8. **Comment:** The overall control efficiency in Condition #15238 Part 3 should be changed to 77.6%.  
**Response:** The control efficiency condition was established in the Authority to Construct issued in response to Application 17637. An application to modify the permit condition would be required to make the requested change.
  9. **Comment:** The overall control efficiency in Condition #15238 Part 5.d should be changed to 77.6%.  
**Response:** See previous response.
  10. **Comment:** The overall control efficiency in Table VII-E for S-26 should be changed to 77.6%.  
**Response:** See previous response.
  11. **Comment:** The fourth limit in Table VII-E should be clarified to include the phrase “during unabated operation.”  
**Response:** The clarification is not necessary. If this clarification were needed, it would belong in Table IV (applicable requirements), not Table VII.(monitoring requirements). However, the District has corrected the citation of limit to Condition #15238, Part 4.

Sincerely yours,

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Steve Hill  
Air Quality Engineering Manager

Final version:

**Condition #14373**

**For S-1, S-2, S-17, S-18, S-22, S-23, S-24, S-25, and S-26**

- ~~14. A source test shall be conducted within one year of the installation of the A-3 Catalytic Oxidizer to determine compliance with part 2 of this condition. The Source test shall be repeated annually. The source test protocol shall be approved by the District's Source Test Manager. A copy of the test results shall be submitted to the District Staff. (basis: BACT, District Regulation 2-6-503)~~
14. The owner/operator shall conduct annual screening testing of the A-2 and A-3 catalytic oxidizer system, prior to October 31 of each calendar year. The screening testing shall be conducted under normal operating conditions at the shared outlet of the oxidizers (rather than at both the inlet and outlet of each of the oxidizers), unless the owner/operator elects to isolate each oxidizer and conduct simultaneous inlet and outlet testing for each oxidizer. The screening testing shall be conducted using District Method ST-7 or an alternative method approved in writing by the District, reporting non-methane hydrocarbon ("NMHC") in parts per million by volume concentration ("ppmv"). As part of the screening testing, any NHMC concentration attributable to contamination present in sampling equipment shall be determined by sampling of ambient air and used in determining the results of the screening testing. (basis: BACT, District Regulation 2-6-503)
15. ~~An annual source test of the A-2 Catalytic Oxidizer shall be conducted annually to determine compliance with part 2 of this condition. The source test protocol shall be approved by the District's Source Test Manager. A copy of the test results shall be submitted to the District Staff. (basis: BACT, District Regulation 2-6-503)~~
15. The owner/operator shall periodically conduct inlet/outlet testing of each oxidizer to determine compliance with part 2 of this condition. Tests shall be scheduled to ensure that, for each oxidizer, fewer than five years have elapsed since the previous test. All such tests shall be conducted in accordance with the District Manual of procedures. All tests shall be conducted under normal operating conditions. This part shall be effective January 1, 2006.
16. The owner/operator shall notify the Director of the Enforcement Division of the planned test date at least one week prior to conducting the test required by Part 14. The results of a valid annual screening testing shall be submitted to the District within 60 days of completion of the screening test. If such results measure outlet NHMC at a level exceeding 10 ppmv, then within 30 days of conducting the screening test, the owner/operator may conduct a screening test of each oxidizer individually. If a valid screening test on an individual oxidizer is not done or if a valid screening test is done and

measured outlet NHMC at a level exceeding 10 ppmv, the owner/operator shall then within 60 days of the original test date conduct inlet/outlet testing of that oxidizer to determine compliance with part 2b of this condition. All tests shall be conducted under normal operating conditions. The results of any such additional testing shall be submitted to the District within 60 days of completion of the testing. (basis: BACT, District Regulation 2-6-503)