



SEP 1 3 2012

Richard Sanchez Label Technology Inc. 2050 Wardrobe Ave Merced, CA 95341

RE: Notice of Final Action - Authority to Construct

Project Number: N-1113462

Dear Mr. Sanchez:

The Air Pollution Control Officer has issued an Authority to Construct permit to Label Technology Inc. for a flexographic printing press, at 2050 Wardrobe Ave in Merced, CA.

Enclosed is a copy of the Authority to Construct permit and a copy of the notice of final action to be published approximately three days from the date of this letter.

Notice of the District's preliminary decision to issue this Authority to Construct was published on July 12, 2012. The District's analysis of the proposal was also sent to CARB and US EPA Region IX on July 9, 2012. No comments were received following the District's preliminary decision on this project.

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

Sincerely

David Warner

Director of Permit Services

DW:JH/st

Enclosures

Seyed Sadredin
Executive Oirector/Air Pollution Control Officer





SEP 1 3 2012

Mike Tollstrup, Chief Project Assessment Branch Stationary Source Division California Air Resources Board PO Box 2815 Sacramento, CA 95812-2815

Notice of Final Action - Authority to Construct

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Director of Permit Services

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Executive Director/Air Pollution Control Officer





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Gerardo C. Rios (AIR 3) Chief, Permits Office Air Division U.S. E.P.A. - Region IX 75 Hawthorne Street San Francisco, CA 94105

RE: Notice of Final Action - Authority to Construct

Project Number: N-1113462

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Sincerely.

David Warner

Director of Permit Services

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Executive Director/Air Pollution Control Officer

Northern Region 4800 Enterprise Way Modesto, CA 95356-8718 Tel: (209) 557-6400 FAX: (209) 557-6475 Central Region (Main Office) 1990 E. Gettysburg Avenue Fresno, CA 93726-0244 Tel: (559) 230-6000 FAX: (559) 230-6061 Southern Region 34946 Flyover Court Bakersfield, CA 93308-9725 Tel: 661-392-5500 FAX: 661-392-5585 Merced Sun-Star Merced Sun-Star

NOTICE OF FINAL ACTION FOR THE ISSUANCE OF AUTHORITY TO CONSTRUCT PERMITS

NOTICE IS HEREBY GIVEN that the Air Pollution Control Officer has issued Authority to Construct permits to Label Technology Inc. for a flexographic printing press, at 2050 Wardrobe Ave in Merced, CA.

No comments were received following the District's preliminary decision on this project.

The application review for Project #N-1113462 is available for public inspection at http://www.valleyair.org/notices/public_notices_idx.htm and the SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT, 4800 ENTERPRISE WAY, MODESTO, CA 95356.





AUTHORITY TO CONSTRUCT

PERMIT NO: N-3852-20-0 ISSUANCE DATE: 09/11/2012

LEGAL OWNER OR OPERATOR: LABEL TECHNOLOGY, INC.

2050 WARDROBE AVE

MAILING ADDRESS:

MERCED, CA 95340

LOCATION:

2050 WARDROBE AVE MERCED, CA 95340

EQUIPMENT DESCRIPTION:

GRAPHIC ARTS PRINTING OPERATION CONSISTING OF AN MPS 10-COLOR FLEXOGRAPHIC PRINTING PRESS EQUIPPED WITH ELECTRIC DRYERS

CONDITIONS

- 1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
- 2. 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]
- 3. The VOC content, less water and exempt compounds, of graphic art materials used by this printing press shall not exceed any of the following limits: (1) for inks: 2.4 lb/gal, (2) for coatings: 2.5 lb/gal, (3) for adhesives: 1.25 lb/gal, and (4) for web splicing adhesives: 1.25 lb/gal. [District Rules 2201 and 4607]
- 4. This press shall be utilized only for printing onto low porosity materials. [District Rule 2201]
- 5. The VOC emissions from this printing press shall not exceed 4.9 pounds in any one day and 419 pounds in any one calendar year. [District Rule 2201]
- 6. The facility-wide VOC emissions shall be less than 50,000 pounds during any one calendar year. [District Rule 2201]
- 7. Only flow coater, roll coater, dip coater, foam coater, die coater, hand application methods shall be used to apply coatings. Application equipment shall be operated in accordance with the manufacturer's specifications. [District Rule 4607]

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, ordiffances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadjedin Executive Director PC

DAVID WARNER, Director of Permit Services

- 8. The VOC content of solvents used for this operation shall not exceed any of the following limits: (1) For product cleaning during manufacturing process, or surface preparation for coating, ink or adhesive application: 25 grams VOC/liter of material; (2) For repair and maintenance cleaning: 25 grams VOC/liter of material; (3) For cleaning of coating or adhesive application equipment: 25 grams VOC/liter of material; and (4) For cleaning of flexographic ink application equipment: 25 grams VOC/liter of material. [District Rule 4607]
- 9. Cleaning operations that use solvents with a VOC content greater than 25 grams/liter of material, if allowed by the permit, 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 propellant-induced force; (3) Non-atomized solvent flow method in which the cleaning solvent is collected in a container or solvent 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 shall 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 4607]
- 10. For cleaning operations that use solvents with a VOC content greater than 25 grams/liter of material, if allowed by this permit, the solvent shall not be atomized into the open air. This provision shall not apply to printing operations where the roller or blanket wash is applied and shall not apply to the cleaning of nozzle tips of automated spray equipment systems, except for robotic systems, and shall not apply to the cleaning with spray bottles or containers. [District Rule 4607]
- 11. Permittee shall store or dispose of fresh or spent solvents, waste solvent cleaning materials, coatings, adhesives, catalysts, thinners, and inks in closed, non-absorbent, 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 4607]
- 12. Permittee shall maintain a current file documenting coatings, inks, adhesives, fountain solutions, wash primers, and solvents in use and in storage. The file shall include a material safety data sheet or product data sheet showing the material name, manufacturer's name, VOC content as applied, specific mixing instructions, and density. [District Rule 4607]
- 13. Permittee shall record on a daily basis, the product name, type (e.g. ink, solvent, etc.), amount used in gallons, VOC content (lb/gal), and calculated daily and annual VOC emissions from each ink and solvent used. [District Rules 2201 and 4607]
- 14. A record of the facility-wide VOC emissions, on a calendar year basis, shall be maintained. The records shall be updated at least monthly. [District Rule 2201]
- 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 Rules 1070, 2201 and 4607]
- 16. Total stationary source emissions shall not exceed 10 tons in any rolling-12 month period of any single hazardous air pollutant (HAP) (as defined in 40 CFR 63.2) and 25 tons in any rolling-12 month period of any combination of HAPs. [District Rule 4002 and 40 CFR 63 Subpart KK]
- 17. Permittee shall use District approved emission estimating techniques to determine HAP emissions. Permittee shall maintain monthly records of the rolling 12-month HAP emissions. Monthly records shall include records of all required measurements and calculations necessary to demonstrate compliance, including the mass of all HAP containing materials used and the mass fraction of HAP present in each HAP containing material used. [District Rule 4002 and 40 CFR 63 Subpart KK]