



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT



FEB 13 2014

Mr. Mark Kulick
QG, LLC
2201 Cooper Avenue
Merced CA 95348

Re Final - Authority to Construct / COC (Significant Mod)
District Facility # N-1646
Project # N-1131851

Dear Mr. Kulick

The Air Pollution Control Officer has issued Authorities to Construct (N-1646-6-7 '-16-7, '-23-7, '-36-6, '-37-5, '-38-7, '-39-8 and '-45-1) with Certificates of Conformity to QG, LLC at 2201 Cooper Avenue Merced CA. The applicant proposes to convert the current daily VOC specifically limiting condition (SLC) of 235.6 lb-VOC/day to an annual SLC of 85,994 lb-VOC/year based on operating 365 days/year. In addition, the daily VOC emission limits from the printing inks and solvents will be increased for permit units N-1646-16 (from 27.5 to 37.5 lb/day), N-1646-23 (from 37.5 to 50 lb/day), N-1646-36 through N-1646-38 (from 95.5 to 105 lb/day), N-1646-39 (from 27.5 to 40 lb/day) and N-1646-45 (from 74.1 to 105 lb/day). Enclosed are the Authorities to Construct 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 the Authority to Construct permit was published on December 31, 2013. The District's analysis of the proposal was also sent to CARB and US EPA Region IX on December 24, 2013. No comments were received following the District's preliminary decision on this project.

Prior to operating with modifications authorized by the Authority to Construct, you must submit an application to modify the Title V permit as an administrative amendment in accordance with District Rule 2520, Section 11.5.

Also enclosed is an invoice for the engineering evaluation fees pursuant to District Rule 3010. Please remit the amount owed, along with a copy of the attached invoice, within 60 days.

Seyed Sadredin
Executive Director/Air Pollution Control Officer

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

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

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

Mr Mark Kulick
Page 2

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

Sincerely,

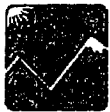
A handwritten signature in black ink, appearing to read 'D. Warner', with a long horizontal flourish extending to the right.

David Warner
Director of Permit Services

DW KC/st

Enclosures

cc Mike Tollstrup, CARB (w/enclosure) via email
cc Gerardo C Rios, EPA (w/enclosure) via email



AUTHORITY TO CONSTRUCT

PERMIT NO N-1646-6 7

ISSUANCE DATE 02/10/2014

LEGAL OWNER OR OPERATOR QG LLC
MAILING ADDRESS N61 W23044 HARRY S WAY
SUSSEX WI 53089 3995

LOCATION 2201 COOPER AVE
MERCED CA 95348

EQUIPMENT DESCRIPTION

MODIFICATION OF GRAPHIC ARTS PRINTING OPERATION CONSISTING OF ONE HARRIS MODEL 1000B HEATSET OFFSET LITHOGRAPHIC PRINTING PRESS #514 SERVED BY TWO TEC NATURAL GAS FIRED DRYING OVENS (TOTAL OF 14 MMBTU/HR) ALL VENTED TO THE 95 MMBTU/HR MEG TEC ENTERPRISE II OR 18 MMBTU/HR REECO RETHERM MODEL E REGENERATIVE THERMAL OXIDIZERS TO CONVERT THE CURRENT DAILY SPECIFIC LIMITING CONDITION (SLC) FROM 235.6 LB-VOC/DAY TO AN ANNUAL SLC OF 85,994 LB-VOC/YEAR

CONDITIONS

- 1 This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c) [District Rule 2201] Federally Enforceable Through Title V Permit
- 2 Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4 [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
- 3 No air contaminant shall be released into the atmosphere which causes a public nuisance [District Rule 4102]
- 4 Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration [District Rule 4201] Federally Enforceable Through Title V Permit
- 5 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]
- 6 Total Volatile Organic Compound (VOC) emissions from the entire stationary source (excluding permit unit N 1646 34) shall not exceed 85,994 pounds in any rolling 12 consecutive month period [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 Sadreddin, Executive Director / APOO


DAVID WARNER Director of Permit Services

N 1646-6-7 Feb 10 2014 1:59PM - CHANG Joint In packet NOT Required

- 7 Total NO_x emissions from the entire stationary source (excluding permit unit N 1646 34) shall not exceed 150 pounds during any one day A daily log of fuel usage for each dryer and for each regenerative thermal oxidizer shall be maintained on the premises [District Rule 2201] Federally Enforceable Through Title V Permit
- 8 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
- 9 The drying ovens and regenerative thermal oxidizers shall be fired exclusively on natural gas [District Rule 2201] Federally Enforceable Through Title V Permit
- 10 The drying oven serving the heatset offset printing press shall be maintained under negative pressure and shall be vented through the thermal oxidizer at all times except during periods of start-up while the dryer is being air purged [District Rule 2201] Federally Enforceable Through Title V Permit
- 11 The collection system for the dryer exhaust and for all fugitive VOC emissions shall have a minimum capture efficiency of 90% [District Rules 2201 and 4607, 5 6] Federally Enforceable Through Title V Permit
- 12 Each thermal oxidizer shall be operated with a minimum VOC destruction efficiency of 98% [District Rules 2201 and 4607 5 6] Federally Enforceable Through Title V Permit
- 13 The VOC content of organic solvents used to perform surface preparation or cleanup shall not exceed the VOC content limits specified in Table 7 of Rule 4607 (Graphic Arts and Paper, Film, Foil and Fabric Coatings 12/18/08 version) [District Rule 4607, 5 8 1] Federally Enforceable Through Title V Permit
- 14 For a permittee using any solvent containing more than 25 g/L (0 21 lb/gal) of VOC for organic solvent cleaning cleaning activities shall be by one of the following methods (1) wipe cleaning, or (2) application of solvent from hand held spray bottles from which solvents are dispensed without a propellant induced force or (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 4607 5 8 3] Federally Enforceable Through Title V Permit
- 15 For a permittee using any solvent containing more than 25 g/L (0 21 lb/gal) of VOC for organic solvent cleaning, solvent shall not be atomized into the open air unless it is vented to a VOC control device This provision shall not apply to operations where roller or blanket wash is applied automatically and the cleaning of the nozzle tips of automated spray equipment systems, except for robotic systems and cleaning with nonpropellant induced hand-held spray bottles or containers which solvents are dispensed without a propellant induced force [District Rule 4607, 5 8 4] Federally Enforceable Through Title V Permit
- 16 For a permittee using any solvent containing more than 25 g/L (0 21 lb/gal) of VOC for organic solvent cleaning, the permittee shall not use VOC containing material to clean spray equipment used for the application of coatings, adhesives or ink unless an enclosed system or equipment that is proven to be equally effective at controlling emissions is used for cleaning If an enclosed system is used, it must totally enclose spray guns cups, nozzles bowls and other parts during washing rinsing draining procedures, and it must be used according to manufacturer's recommendations and must be closed when not in use [District Rule 4607 5 8 5] Federally Enforceable Through Title V Permit
- 17 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, 5 9] Federally Enforceable Through Title V Permit
- 18 The permittee shall properly use and operate all graphic arts printing technologies as directed and/or specified by the manufacturer of the printer or graphic arts material [District Rule 4607, 5 10] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

- 19 The Volatile Organic Compound (VOC) content of the printing inks as applied (excluding water and exempt compounds) shall be less than 45% by weight and the VOC content of the fountain solutions shall be less than 15% by volume [District Rule 2201] Federally Enforceable Through Title V Permit
- 20 VOC emissions from the printing inks and solvents shall not exceed 37.5 pounds in any one day [District Rule 2201] Federally Enforceable Through Title V Permit
- 21 NO_x emissions from the drying oven shall not exceed 4.3 ppmvd @ 19% O₂ (referenced as NO₂) [District Rule 2201] Federally Enforceable Through Title V Permit
- 22 CO emissions from the drying oven shall not exceed 25.0 ppmvd @ 19% O₂ [District Rule 2201] Federally Enforceable Through Title V Permit
- 23 Emissions from the drying oven shall not exceed any of the following limits: 0.00285 lb-SO_x/MMBtu, 0.0076 lb-PM₁₀/MMBtu or 0.0055 lb VOC/MMBtu [District Rule 2201] Federally Enforceable Through Title V Permit
- 24 NO_x emissions from the regenerative thermal oxidizers shall not exceed 4.3 ppmvd @ 19% O₂ (referenced as NO₂) [District Rule 2201] Federally Enforceable Through Title V Permit
- 25 CO emissions from the regenerative thermal oxidizers shall not exceed 25.0 ppmvd @ 19% O₂ [District Rule 2201] Federally Enforceable Through Title V Permit
- 26 Emissions from the regenerative thermal oxidizers shall not exceed any of the following limits: 0.00285 lb-SO_x/MMBtu, 0.0076 lb-PM₁₀/MMBtu or 0.0055 lb-VOC/MMBtu [District Rule 2201] Federally Enforceable Through Title V Permit
- 27 Source testing to demonstrate compliance with the VOC destruction efficiency of each regenerative thermal oxidizer shall be conducted on an annual basis [District Rule 2201] Federally Enforceable Through Title V Permit
- 28 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, 7.1] Federally Enforceable Through Title V Permit
- 29 The results of each source test shall be submitted to the District within 60 days thereafter [District Rule 1081, 7.3] Federally Enforceable Through Title V Permit
- 30 Source testing to determine the destruction efficiency of each regenerative thermal oxidizer shall be conducted using EPA Methods 2, 2A, or 2D for measuring flow rates and EPA Methods 25, 25A or 25C for measuring total gaseous organic concentrations at the inlet and outlet of the control device [District Rule 4607, 6.4.7] Federally Enforceable Through Title V Permit
- 31 Permittee shall maintain a current file of coatings, inks, adhesives, fountain solutions, wash primers and solvents in use and in storage. The file shall include material safety data sheet (MSDS) or product data sheet showing the material name, manufacturer's name, VOC content as applied, mixing instruction and density [District Rule 4607, 6.1.1] Federally Enforceable Through Title V Permit
- 32 The permittee shall record on a daily basis the type and amount of each coating, adhesive, fountain solution, wash primer and solvent used [District Rule 4607, 6.1.3] Federally Enforceable Through Title V Permit
- 33 The permittee shall record on a monthly basis the type and amount of all inks used and their VOC content and densities, using one of the methods listed in Rule 4607, Section 6.1.2.1 (12/18/08 version of Rule 4607) [District Rule 4607, 6.1.2.1] Federally Enforceable Through Title V Permit
- 34 The permittee shall record on a monthly basis the type and amount of each ink, coating, adhesive, wash primer, and solvent used [District Rule 4607, 6.1.2.2] Federally Enforceable Through Title V Permit
- 35 The permittee shall record on a monthly basis the type, amount and percent VOC by volume of each fountain solution used [District Rule 4607, 6.1.2.3] Federally Enforceable Through Title V Permit
- 36 The permittee shall maintain daily records of the following: (1) Quantity of VOC emitted (in pounds) from this printing press; (2) Quantity of natural gas used (in cubic feet) by each drying oven and each thermal oxidizer at the facility; (3) Operational temperature of the regenerative thermal oxidizer [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

- 37 The permittee shall maintain monthly records of the total VOC emissions from the entire stationary source (excluding permit unit N-1646 34) These records shall be used to determine compliance with the rolling 12 consecutive month VOC limit [District Rules 1070 and 2201]
- 38 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 1070, 2520, and 4607] Federally Enforceable Through Title V Permit
- 39 Each regenerative thermal oxidizer shall be equipped with an operational continuous temperature monitoring and recording instrument [District Rules 2201 2520 9 3 2, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
- 40 Each regenerative thermal oxidizer shall be operated at a minimum temp of 1400 deg F The regenerative thermal oxidizer shall be preheated to 1400 deg F prior to the start-up of the heatset offset printing operation Upon determining an excursion from this requirement the permittee shall investigate the excursion and take corrective action to minimize emissions and prevent recurrence of the excursion as expeditiously as practicable [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
- 41 The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR part 64 7 [40 CFR part 64] Federally Enforceable Through Title V Permit
- 42 The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR part 64 9 [40 CFR part 64] Federally Enforceable Through Title V Permit
- 43 If the District or EPA determine that a Quality improvement plan is required under 40 CFR part 64 7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64 8 [40 CFR Part 64] Federally Enforceable Through Title V Permit



AUTHORITY TO CONSTRUCT

PERMIT NO N 1646 16 7

ISSUANCE DATE 02/10/2014

LEGAL OWNER OR OPERATOR QG LLC
MAILING ADDRESS N61 W23044 HARRY S WAY
SUSSEX WI 53089-3995

LOCATION 2201 COOPER AVE
MERCED CA 95348

EQUIPMENT DESCRIPTION

MODIFICATION OF GRAPHIC ARTS PRINTING OPERATION CONSISTING OF ONE HARRIS MODEL 1000 HEATSET OFFSET LITHOGRAPHIC PRINTING PRESS #517 SERVED BY TWO TEC NATURAL GAS FIRED DRYING OVENS (TOTAL OF 1 366 MMBTU/HR) ALL VENTED TO THE 9 5 MMBTU/HR MEG TEC ENTERPRISE II OR 18 MMBTU/HR REECO RETHERM MODEL E REGENERATIVE THERMAL OXIDIZERS TO CONVERT THE CURRENT DAILY SPECIFIC LIMITING CONDITION (SLC) FROM 235 6 LB VOC/DAY TO AN ANNUAL SLC OF 85 994 LB VOC/YEAR IN ADDITION THE CURRENT DAILY EMISSIONS LIMIT WILL BE INCREASED FROM 27 LB VOC/DAY TO 37 5 LB VOC/DAY

CONDITIONS

- 1 This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70 7 and 70 8 and with the compliance requirements of 40 CFR 70 6(c) [District Rule 2201] Federally Enforceable Through Title V Permit
- 2 Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5 3 4 [District Rule 2520, 5 3 4] Federally Enforceable Through Title V Permit
- 3 No air contaminant shall be released into the atmosphere which causes a public nuisance [District Rule 4102]
- 4 Particulate matter emissions shall not exceed 0 1 grains/dscf in concentration [District Rule 4201] Federally Enforceable Through Title V Permit
- 5 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]

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 Sadeghin Executive Director / APPO

DAVID WARNER Director of Permit Services

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- 6 Total Volatile Organic Compound (VOC) emissions from the entire stationary source (excluding permit unit N-1646-34) shall not exceed 85 994 pounds in any rolling 12 consecutive month period [District Rule 2201]
- 7 Total NOx emissions from the entire stationary source (excluding permit unit N 1646 34) shall not exceed 150 pounds during any one day [District Rule 2201]
- 8 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
- 9 The drying ovens and regenerative thermal oxidizers shall be fired exclusively on natural gas [District Rule 2201] Federally Enforceable Through Title V Permit
- 10 The drying oven serving the heatset offset printing press shall be maintained under negative pressure and shall be vented through the thermal oxidizer at all times except during periods of start up while the dryer is being air purged [District Rule 2201] Federally Enforceable Through Title V Permit
- 11 The collection system for the dryer exhaust and for all fugitive VOC emissions shall have a minimum capture efficiency of 90% [District Rules 2201 and 4607 5 6] Federally Enforceable Through Title V Permit
- 12 Each thermal oxidizer shall be operated with a minimum VOC destruction efficiency of 98% [District Rules 2201 and 4607 5 6] Federally Enforceable Through Title V Permit
- 13 The VOC content of organic solvents used to perform surface preparation or cleanup shall not exceed the VOC content limits specified in Table 7 of Rule 4607 (Graphic Arts and Paper Film Foil and Fabric Coatings - 12/18/08 version) [District Rule 4607, 5 8 1] Federally Enforceable Through Title V Permit
- 14 For a permittee using any solvent containing more than 25 g/L (0 21 lb/gal) of VOC for organic solvent cleaning, cleaning activities shall be by one of the following methods (1) wipe cleaning or (2) application of solvent from hand held spray bottles from which solvents are dispensed without a propellant-induced force or (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 4607, 5 8 3] Federally Enforceable Through Title V Permit
- 15 For a permittee using any solvent containing more than 25 g/L (0 21 lb/gal) of VOC for organic solvent cleaning solvent shall not be atomized into the open air unless it is vented to a VOC control device This provision shall not apply to operations where roller or blanket wash is applied automatically and the cleaning of the nozzle tips of automated spray equipment systems except for robotic systems and cleaning with nonpropellant-induced, hand-held spray bottles or containers which solvents are dispensed without a propellant induced force [District Rule 4607 5 8 4] Federally Enforceable Through Title V Permit
- 16 For a permittee using any solvent containing more than 25 g/L (0 21 lb/gal) of VOC for organic solvent cleaning the permittee shall not use VOC-containing material to clean spray equipment used for the application of coatings, adhesives or ink unless an enclosed system or equipment that is proven to be equally effective at controlling emissions is used for cleaning If an enclosed system is used, it must totally enclose spray guns, cups, nozzles, bowls and other parts during washing rinsing draining procedures and it must be used according to manufacturer's recommendations and must be closed when not in use [District Rule 4607 5 8 5] Federally Enforceable Through Title V Permit
- 17 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, 5 9] Federally Enforceable Through Title V Permit
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CONDITIONS CONTINUE ON NEXT PAGE

- 19 The Volatile Organic Compound (VOC) content of the printing inks as applied (excluding water and exempt compounds) shall be less than 45% by weight and the VOC content of the fountain solutions shall be less than 15% by volume [District Rule 2201] Federally Enforceable Through Title V Permit
- 20 VOC emissions from the printing inks and solvents shall not exceed 37.5 pounds in any one day [District Rule 2201] Federally Enforceable Through Title V Permit
- 21 NO_x emissions from the drying oven shall not exceed 4.3 ppmvd @ 19% O₂ (referenced as NO₂) [District Rule 2201] Federally Enforceable Through Title V Permit
- 22 CO emissions from the drying oven shall not exceed 25.0 ppmvd @ 19% O₂ [District Rule 2201] Federally Enforceable Through Title V Permit
- 23 Emissions from the drying oven shall not exceed any of the following limits: 0.00285 lb-SO_x/MMBtu, 0.0076 lb-PM₁₀/MMBtu or 0.0055 lb VOC/MMBtu [District Rule 2201] Federally Enforceable Through Title V Permit
- 24 NO_x emissions from the regenerative thermal oxidizers shall not exceed 4.3 ppmvd @ 19% O₂ (referenced as NO₂) [District Rule 2201] Federally Enforceable Through Title V Permit
- 25 CO emissions from the regenerative thermal oxidizers shall not exceed 25.0 ppmvd @ 19% O₂ [District Rule 2201] Federally Enforceable Through Title V Permit
- 26 Emissions from the regenerative thermal oxidizers shall not exceed any of the following limits: 0.00285 lb SO_x/MMBtu, 0.0076 lb PM₁₀/MMBtu or 0.0055 lb VOC/MMBtu [District Rule 2201] Federally Enforceable Through Title V Permit
- 27 Source testing to demonstrate compliance with the VOC destruction efficiency of each regenerative thermal oxidizer shall be conducted on an annual basis [District Rule 2201] Federally Enforceable Through Title V Permit
- 28 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, 7.1] Federally Enforceable Through Title V Permit
- 29 The results of each source test shall be submitted to the District within 60 days thereafter [District Rule 1081, 7.3] Federally Enforceable Through Title V Permit
- 30 Source testing to determine the destruction efficiency of each regenerative thermal oxidizer shall be conducted using EPA Methods 2, 2A or 2D for measuring flow rates and EPA Methods 25, 25A or 25C for measuring total gaseous organic concentrations at the inlet and outlet of the control device [District Rule 4607, 6.4.7] Federally Enforceable Through Title V Permit
- 31 Permittee shall maintain a current file of coatings, inks, adhesives, fountain solutions, wash primers, and solvents in use and in storage. The file shall include material safety data sheet (MSDS) or product data sheet showing the material name, manufacturer's name, VOC content as applied, mixing instruction, and density [District Rule 4607, 6.1.1] Federally Enforceable Through Title V Permit
- 32 The permittee shall record on a daily basis the type and amount of each coating, adhesive, fountain solution, wash primer, and solvent used [District Rule 4607, 6.1.3] Federally Enforceable Through Title V Permit
- 33 The permittee shall record on a monthly basis, the type and amount of all inks used and their VOC content and densities using one of the methods listed in Rule 4607, Section 6.1.2.1 (12/18/08 version of Rule 4607) [District Rule 4607, 6.1.2.1] Federally Enforceable Through Title V Permit
- 34 The permittee shall record on a monthly basis, the type and amount of each ink, coating, adhesive, wash primer, and solvent used [District Rule 4607, 6.1.2.2] Federally Enforceable Through Title V Permit
- 35 The permittee shall record on a monthly basis, the type, amount and percent VOC by volume of each fountain solution used [District Rule 4607, 6.1.2.3] Federally Enforceable Through Title V Permit
- 36 The permittee shall maintain daily records of the following: (1) Quantity of VOC emitted (in pounds) from this printing press, (2) Quantity of natural gas used (in cubic feet) by each drying oven and each thermal oxidizer at the facility, (3) Operational temperature of the regenerative thermal oxidizer [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

- 37 The permittee shall maintain monthly records of the total VOC emissions from the entire stationary source (excluding permit unit N-1646 34) These records shall be used to determine compliance with the rolling 12 consecutive month VOC limit [District Rules 1070 and 2201]
- 38 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 1070 2520 and 4607] Federally Enforceable Through Title V Permit
- 39 Each regenerative thermal oxidizer shall be equipped with an operational continuous temperature monitoring and recording instrument [District Rules 2201 2520 9 3 2 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
- 40 Each regenerative thermal oxidizer shall be operated at a minimum temp of 1400 deg F The regenerative thermal oxidizer shall be preheated to 1400 deg F prior to the start up of the heatset offset printing operation Upon determining an excursion from this requirement the permittee shall investigate the excursion and take corrective action to minimize emissions and prevent recurrence of the excursion as expeditiously as practicable [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
- 41 The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR part 64 7 [40 CFR part 64] Federally Enforceable Through Title V Permit
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AUTHORITY TO CONSTRUCT

PERMIT NO N 1646 23 7

ISSUANCE DATE 02/10/2014

LEGAL OWNER OR OPERATOR QG LLC
MAILING ADDRESS N61 W23044 HARRY S WAY
SUSSEX WI 53089 3995

LOCATION 2201 COOPER AVE
MERCED CA 95348

EQUIPMENT DESCRIPTION

MODIFICATION OF GRAPHIC ARTS PRINTING OPERATION CONSISTING OF ONE HEIDELBERG HARRIS MODEL M 1000B HEATSET OFFSET PRINTING PRESS #519 SERVED BY ONE 9 5 MMBTU/HR THERMAL ELECTRON MODEL A3406E DRYING OVEN VENTED TO THE 9 5 MMBTU/HR MEG TEC ENTERPRISE II OR 18 MMBTU/HR REECO RETHERM MODEL E REGENERATIVE THERMAL OXIDIZERS TO CONVERT THE CURRENT DAILY SPECIFIC LIMITING CONDITIONS (SLC) FROM 235 6 LB VOC/DAY TO AN ANNUAL SLC OF 85 994 LB VOC/YEAR IN ADDITION THE CURRENT DAILY EMISSIONS LIMIT WILL BE INCREASED FROM 37 5 LB VOC/DAY TO 50 LB-VOC/DAY

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- 2 Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5 3 4 [District Rule 2520, 5 3 4] Federally Enforceable Through Title V Permit
- 3 No air contaminant shall be released into the atmosphere which causes a public nuisance [District Rule 4102]
- 4 Particulate matter emissions shall not exceed 0 1 grains/dscf in concentration [District Rule 4201] Federally Enforceable Through Title V Permit
- 5 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]

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

Sayed Saadedin, Executive Director / APCO

DAVID WARNER Director of Permit Services

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- 6 Total Volatile Organic Compound (VOC) emissions from the entire stationary source (excluding permit unit N 1646 34) shall not exceed 85,994 pounds in any rolling 12 consecutive month period [District Rule 2201]
- 7 Total NOx emissions from the entire stationary source (excluding permit unit N 1646 34) shall not exceed 150 pounds during any one day [District Rule 2201]
- 8 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
- 9 The drying ovens and regenerative thermal oxidizers shall be fired exclusively on natural gas [District Rule 2201] Federally Enforceable Through Title V Permit
- 10 The drying ovens serving the heatset offset printing press shall be maintained under negative pressure and shall be vented through the regenerative thermal oxidizer at all times except during periods of start up while the dryers are being air purged [District Rule 2201] Federally Enforceable Through Title V Permit
- 11 The collection system for the dryer exhausts and for all fugitive VOC emissions shall have a minimum capture efficiency of 90% [District Rules 2201 and 4607 5 6] Federally Enforceable Through Title V Permit
- 12 Each regenerative thermal oxidizer shall be operated with a minimum VOC destruction efficiency of 98% [District Rules 2201 and 4607, 5 6] Federally Enforceable Through Title V Permit
- 13 The VOC content of organic solvents used to perform surface preparation or cleanup shall not exceed the VOC content limits specified in Table 7 of Rule 4607 (Graphic Arts and Paper Film, Foil, and Fabric Coatings 12/18/08 version) [District Rule 4607 5 8 1] Federally Enforceable Through Title V Permit
- 14 For a permittee using any solvent containing more than 25 g/L (0 21 lb/gal) of VOC for organic solvent cleaning cleaning activities shall be by one of the following methods (1) wipe cleaning, or (2) application of solvent from hand held spray bottles from which solvents are dispensed without a propellant induced force, or (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 4607 5 8 3] Federally Enforceable Through Title V Permit
- 15 For a permittee using any solvent containing more than 25 g/L (0 21 lb/gal) of VOC for organic solvent cleaning solvent shall not be atomized into the open air unless it is vented to a VOC control device This provision shall not apply to operations where roller or blanket wash is applied automatically and the cleaning of the nozzle tips of automated spray equipment systems, except for robotic systems and cleaning with nonpropellant induced hand held spray bottles or containers which solvents are dispensed without a propellant induced force [District Rule 4607 5 8 4] Federally Enforceable Through Title V Permit
- 16 For a permittee using any solvent containing more than 25 g/L (0 21 lb/gal) of VOC for organic solvent cleaning the permittee shall not use VOC containing material to clean spray equipment used for the application of coatings, adhesives or ink unless an enclosed system or equipment that is proven to be equally effective at controlling emissions is used for cleaning If an enclosed system is used, it must totally enclose spray guns cups, nozzles bowls and other parts during washing rinsing draining procedures and it must be used according to manufacturer's recommendations and must be closed when not in use [District Rule 4607, 5 8 5] Federally Enforceable Through Title V Permit
- 17 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 5 9] Federally Enforceable Through Title V Permit
- 18 The permittee shall properly use and operate all graphic arts printing technologies as directed and/or specified by the manufacturer of the printer or graphic arts material [District Rule 4607 5 10] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

- 19 The Volatile Organic Compound (VOC) content of the printing inks as applied (excluding water and exempt compounds) shall be less than 45% by weight and the VOC content of the fountain solutions shall be less than 15% by volume [District Rule 2201] Federally Enforceable Through Title V Permit
- 20 VOC emissions from the printing inks and solvents shall not exceed 50 0 pounds in any one day [District Rule 2201] Federally Enforceable Through Title V Permit
- 21 NO_x emissions from the drying oven shall not exceed 4 3 ppmvd @ 19% O₂ (referenced as NO₂) [District Rules 2201 & 4309 5 2] Federally Enforceable Through Title V Permit
- 22 CO emissions from the drying oven shall not exceed 25 0 ppmvd @ 19% O₂ [District Rules 2201 & 4309, 5 2] Federally Enforceable Through Title V Permit
- 23 Emissions from the drying oven shall not exceed any of the following limits 0 00285 lb SO_x/MMBtu, 0 0076 lb-PM₁₀/MMBtu or 0 0055 lb-VOC/MMBtu [District Rule 2201] Federally Enforceable Through Title V Permit
- 24 NO_x emissions from the regenerative thermal oxidizers shall not exceed 4 3 ppmvd @ 19% O₂ (referenced as NO₂) [District Rules 2201 & 4309 5 2] Federally Enforceable Through Title V Permit
- 25 CO emissions from the regenerative thermal oxidizers shall not exceed 25 0 ppmvd @ 19% O₂ [District Rules 2201 & 4309 5 2] Federally Enforceable Through Title V Permit
- 26 Emissions from the regenerative thermal oxidizers shall not exceed any of the following limits 0 00285 lb SO_x/MMBtu 0 0076 lb PM₁₀/MMBtu or 0 0055 lb VOC/MMBtu [District Rule 2201] Federally Enforceable Through Title V Permit
- 27 Source testing to demonstrate compliance with the VOC destruction efficiency of each regenerative thermal oxidizer shall be conducted on an annual basis [District Rule 2201] Federally Enforceable Through Title V Permit
- 28 Source testing to determine the destruction efficiency of each regenerative thermal oxidizer shall be conducted using EPA Methods 2 2A or 2D for measuring flow rates and EPA Methods 25, 25A or 25C for measuring total gaseous organic concentrations at the inlet and outlet of the control device [District Rule 4607, 6 4 7] Federally Enforceable Through Title V Permit
- 29 Source testing to measure NO_x and CO emissions from the drying ovens shall be conducted at the exhaust of the associated regenerative thermal oxidizer at least once every 24 months [District Rules 2201 and 4309, 6 3 2] Federally Enforceable Through Title V Permit
- 30 All test results for NO_x and CO shall be reported in ppmv @ 19% O₂ (or no correction if measured above 19% O₂) corrected to dry stack conditions [District Rule 4309, 6 3 7] Federally Enforceable Through Title V Permit
- 31 NO_x emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis [District Rule 4309 6 2] Federally Enforceable Through Title V Permit
- 32 CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100 [District Rule 4309 6 2] Federally Enforceable Through Title V Permit
- 33 Stack gas oxygen (O₂) shall be determined using EPA Method 3 or 3A or ARB Method 100 [District Rule 4309 6 2] Federally Enforceable Through Title V Permit
- 34 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, 5 5 1 & 5 5 2] Federally Enforceable Through Title V Permit
- 35 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, 5 5 6] Federally Enforceable Through Title V Permit
- 36 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 Rule 1081] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

- 37 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
- 38 The permittee shall monitor and record the stack concentration of NO_x, CO, and O₂ at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month [District Rule 4309, 5.4] Federally Enforceable Through Title V Permit
- 39 If either the NO_x or CO concentrations corrected to 19% O₂ (or no correction if measured above 19% O₂), as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition [District Rule 4309, 5.4] Federally Enforceable Through Title V Permit
- 40 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, 5.4] Federally Enforceable Through Title V Permit
- 41 The permittee shall maintain records of (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 19% O₂ (or no correction if measured above 19% O₂), (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range [District Rule 4309, 5.4] Federally Enforceable Through Title V Permit
- 42 Permittee shall maintain a current file of coatings, inks, adhesives, fountain solutions, wash primers, and solvents in use and in storage. The file shall include material safety data sheet (MSDS) or product data sheet showing the material name, manufacturer's name, VOC content as applied, mixing instruction, and density [District Rule 4607, 6.1.1] Federally Enforceable Through Title V Permit
- 43 The permittee shall record on a daily basis, the type and amount of each coating, adhesive, fountain solution, wash primer, and solvent used [District Rule 4607, 6.1.3] Federally Enforceable Through Title V Permit
- 44 The permittee shall record on a monthly basis, the type and amount of all inks used and their VOC content and densities, using one of the methods listed in Rule 4607, Section 6.1.2.1 (12/18/08 version of Rule 4607) [District Rule 4607, 6.1.2.1] Federally Enforceable Through Title V Permit
- 45 The permittee shall record on a monthly basis, the type and amount of each ink, coating, adhesive, wash primer, and solvent used [District Rule 4607, 6.1.2.2] Federally Enforceable Through Title V Permit
- 46 The permittee shall record on a monthly basis, the type, amount, and percent VOC by volume of each fountain solution used [District Rule 4607, 6.1.2.3] Federally Enforceable Through Title V Permit
- 47 The permittee shall maintain daily records of the following: (1) Quantity of VOC emitted (in pounds) from this printing press, (2) Quantity of natural gas used (in cubic feet) by each drying oven and each thermal oxidizer at the facility, (3) Operational temperature of each regenerative thermal oxidizer [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
- 48 The permittee shall maintain monthly records of the total VOC emissions from the entire stationary source (excluding permit unit N-1646-34). These records shall be used to determine compliance with the rolling 12 consecutive month VOC limit [District Rules 1070 and 2201]

CONDITIONS CONTINUE ON NEXT PAGE

- 49 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 1070 2520 and 4607 and 4309] Federally Enforceable Through Title V Permit
- 50 Each regenerative thermal oxidizer shall be equipped with an operational continuous temperature monitoring and recording instrument [District , Rules 2201, 2520, 9 3 2, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
- 51 Each regenerative thermal oxidizer shall be operated at a minimum temp of 1400 deg F The regenerative thermal oxidizer shall be preheated to 1400 deg F prior to the start up of the heatset offset printing operation Upon determining an excursion from this requirement the permittee shall investigate the excursion and take corrective action to minimize emissions and prevent recurrence of the excursion as expeditiously as practicable [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
- 52 The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR part 64 7 [40 CFR part 64] Federally Enforceable Through Title V Permit
- 53 The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR part 64 9 [40 CFR part 64] Federally Enforceable Through Title V Permit
- 54 If the District or EPA determine that a Quality improvement plan is required under 40 CFR part 64 7(d)(2) the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64 8 [40 CFR Part 64] Federally Enforceable Through Title V Permit



AUTHORITY TO CONSTRUCT

PERMIT NO N 1646 36 6

ISSUANCE DATE 02/10/2014

LEGAL OWNER OR OPERATOR QG LLC
MAILING ADDRESS N61 W23044 HARRY'S WAY
SUSSEX WI 53089 3995

LOCATION 2201 COOPER AVE
MERCED CA 95348

EQUIPMENT DESCRIPTION

MODIFICATION OF GRAPHIC ARTS PRINTING OPERATION CONSISTING OF ONE MAN ROLAND MODEL ROTOMAN S 57 5' WIDE 8-COLOR HEATSET OFFSET LITHOGRAPHIC PRINTING PRESS (PRESS #520) AND TWO 9 9 MMBTU/HR NATURAL GAS FIRED MEGTEC MODEL DD III-135 DRYING OVENS (EACH CONSISTS OF AN 8 4 MMBTU/HR MAXON OVENPAK 400 BURNER AND A 1 5 MMBTU/HR MAXON APX BURNER) SERVED BY THE SHARED 9 5 MMBTU/HR MEGTEC ENTERPRISE II OR THE 18 MMBTU/HR REECO RETHERM MODEL E NATURAL GAS FIRED REGENERATIVE THERMAL OXIDIZERS TO CONVERT THE CURRENT DAILY SPECIFIC LIMITING CONDITION (SLC) FROM 235 6 LB-VOC/DAY TO AN ANNUAL SLC OF 85 994 LB VOC/YEAR IN ADDITION THE CURRENT DAILY EMISSIONS LIMIT WILL BE INCREASED FROM 95 5 LB-VOC/DAY TO 105 LB-VOC/DAY

CONDITIONS

- 1 This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70 7 and 70 8 and with the compliance requirements of 40 CFR 70 6(c) [District Rule 2201] Federally Enforceable Through Title V Permit
- 2 Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5 3 4 [District Rule 2520, 5 3 4] Federally Enforceable Through Title V Permit
- 3 No air contaminant shall be released into the atmosphere which causes a public nuisance [District Rule 4102]
- 4 Particulate matter emissions shall not exceed 0 1 grains/dscf in concentration [District Rule 4201] Federally Enforceable Through Title V Permit
- 5 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]

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

Sayed Sadredin Executive Director / APCO

DAVID WARNER Director of Permit Services

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- 6 Total Volatile Organic Compound (VOC) emissions from the entire stationary source (excluding permit unit N-1646 34) shall not exceed 85,994 pounds in any rolling 12 consecutive month period [District Rule 2201]
- 7 Total NOx emissions from the entire stationary source (excluding permit unit N 1646 34) shall not exceed 150 pounds during any one day [District Rule 2201]
- 8 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
- 9 The drying ovens and regenerative thermal oxidizers shall be fired exclusively on natural gas [District Rule 2201] Federally Enforceable Through Title V Permit
- 10 The drying ovens serving the heatset offset printing press shall be maintained under negative pressure and shall be vented through the regenerative thermal oxidizer at all times except during periods of start up while the dryers are being air purged [District Rule 2201] Federally Enforceable Through Title V Permit
- 11 The exhaust stack shall vent vertically upward The vertical exhaust flow shall not be impeded by a rain cap (flapper is acceptable), roof overhang or any other obstruction [District Rule 4102]
- 12 A non-resettable totalizing mass or volumetric fuel flow meter to measure the amount of natural gas combusted in the drying ovens shall be installed utilized and maintained [District Rules 2201] Federally Enforceable Through Title V Permit
- 13 The collection system for the dryer exhausts and for all fugitive VOC emissions shall have a minimum capture efficiency of 90% [District Rules 2201 and 4607, 5 6] Federally Enforceable Through Title V Permit
- 14 Each regenerative thermal oxidizer shall be operated with a minimum VOC destruction efficiency of 98% [District Rules 2201 and 4607, 5 6] Federally Enforceable Through Title V Permit
- 15 The VOC content of organic solvents used to perform surface preparation or cleanup shall not exceed the VOC content limits specified in Table 7 of Rule 4607 (Graphic Arts and Paper Film, Foil, and Fabric Coatings 12/18/08 version) [District Rule 4607, 5 8 1] Federally Enforceable Through Title V Permit
- 16 For a permittee using any solvent containing more than 25 g/L (0 21 lb/gal) of VOC for organic solvent cleaning, cleaning activities shall be by one of the following methods (1) wipe cleaning or (2) application of solvent from hand held spray bottles from which solvents are dispensed without a propellant induced force, or (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 4607, 5 8 3] Federally Enforceable Through Title V Permit
- 17 For a permittee using any solvent containing more than 25 g/L (0 21 lb/gal) of VOC for organic solvent cleaning, solvent shall not be atomized into the open air unless it is vented to a VOC control device This provision shall not apply to operations where roller or blanket wash is applied automatically and the cleaning of the nozzle tips of automated spray equipment systems except for robotic systems and cleaning with nonpropellant induced, hand held spray bottles or containers which solvents are dispensed without a propellant-induced force [District Rule 4607, 5 8 4] Federally Enforceable Through Title V Permit
- 18 For a permittee using any solvent containing more than 25 g/L (0 21 lb/gal) of VOC for organic solvent cleaning, the permittee shall not use VOC containing material to clean spray equipment used for the application of coatings, adhesives or ink, unless an enclosed system or equipment that is proven to be equally effective at controlling emissions is used for cleaning If an enclosed system is used it must totally enclose spray guns, cups nozzles bowls, and other parts during washing rinsing draining procedures, and it must be used according to manufacturer's recommendations and must be closed when not in use [District Rule 4607 5 8 5] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

- 19 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 5 9] Federally Enforceable Through Title V Permit
- 20 The permittee shall properly use and operate all graphic arts printing technologies as directed and/or specified by the manufacturer of the printer or graphic arts material [District Rule 4607 5 10] Federally Enforceable Through Title V Permit
- 21 The Volatile Organic Compound (VOC) content of the printing inks as applied (excluding water and exempt compounds) shall be less than 45% by weight and the VOC content of the fountain solutions shall be less than 15% by volume [District Rule 2201] Federally Enforceable Through Title V Permit
- 22 VOC emissions from the printing inks and solvents shall not exceed 105 0 pounds in any one day [District Rule 2201]
- 23 Emissions from the drying ovens shall not exceed any of the following limits 0 00285 lb-SO_x/MMBtu, 0 0076 lb-PM₁₀/MMBtu or 0 0055 lb VOC/MMBtu [District Rule 2201] Federally Enforceable Through Title V Permit
- 24 NO_x emissions from the drying oven shall not exceed 4 3 ppmvd @ 19% O₂ (referenced as NO₂) [District Rules 2201 & 4309 5 2] Federally Enforceable Through Title V Permit
- 25 CO emissions from the drying oven shall not exceed 25 0 ppmvd @ 19% O₂ [District Rules 2201 & 4309, 5 2] Federally Enforceable Through Title V Permit
- 26 Emissions from the regenerative thermal oxidizers shall not exceed any of the following limits 0 00285 lb SO_x/MMBtu 0 0076 lb PM₁₀/MMBtu, or 0 0055 lb-VOC/MMBtu [District Rule 2201] Federally Enforceable Through Title V Permit
- 27 NO_x emissions from the regenerative thermal oxidizers shall not exceed 4 3 ppmvd @ 19% O₂ (referenced as NO₂) [District Rules 2201 & 4309, 5 2] Federally Enforceable Through Title V Permit
- 28 CO emissions from the regenerative thermal oxidizers shall not exceed 25 0 ppmvd @ 19% O₂ [District Rules 2201 & 4309 5 2] Federally Enforceable Through Title V Permit
- 29 The total quantity of natural gas used in the drying ovens under this permit unit shall not exceed 18 7 million cubic feet in any rolling 12 consecutive month period [District Rule 2201]
- 30 Source testing to demonstrate compliance with the VOC destruction efficiency of each regenerative thermal oxidizer shall be conducted on an annual basis [District Rule 2201] Federally Enforceable Through Title V Permit
- 31 Source testing to determine the destruction efficiency of each regenerative thermal oxidizer shall be conducted using EPA Methods 2 2A, or 2D for measuring flow rates and EPA Methods 25, 25A or 25C for measuring total gaseous organic concentrations at the inlet and outlet of the control device [District Rule 4607, 6 4 7] Federally Enforceable Through Title V Permit
- 32 Source testing to measure NO_x and CO emissions from the drying ovens shall be conducted at the exhaust of the associated regenerative thermal oxidizer at least once every 24 months [District Rules 2201 and 4309, 6 3 2] Federally Enforceable Through Title V Permit
- 33 All test results for NO_x and CO shall be reported in ppmv @ 19% O₂ (or no correction if measured above 19% O₂) corrected to dry stack conditions [District Rule 4309, 6 3 7] Federally Enforceable Through Title V Permit
- 34 NO_x emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis [District Rule 4309 6 2] Federally Enforceable Through Title V Permit
- 35 CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100 [District Rule 4309 6 2] Federally Enforceable Through Title V Permit
- 36 Stack gas oxygen (O₂) shall be determined using EPA Method 3 or 3A or ARB Method 100 [District Rule 4309, 6 2] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

- 37 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, 5.5.1 & 5.5.2] Federally Enforceable Through Title V Permit
- 38 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, 5.5.6] Federally Enforceable Through Title V Permit
- 39 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 Rule 1081] Federally Enforceable Through Title V Permit
- 40 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
- 41 The permittee shall monitor and record the stack concentration of NO_x, CO, and O₂ at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month [District Rule 4309, 5.4] Federally Enforceable Through Title V Permit
- 42 If either the NO_x or CO concentrations corrected to 19% O₂ (or no correction if measured above 19% O₂), as measured by the portable analyzer, exceed the allowable emissions concentration the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition [District Rule 4309, 5.4] Federally Enforceable Through Title V Permit
- 43 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 (5) readings evenly spaced out over the 15 consecutive minute period [District Rule 4309, 5.4] Federally Enforceable Through Title V Permit
- 44 The permittee shall maintain records of (1) the date and time of NO_x, CO, and O₂ measurements (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 19% O₂ (or no correction if measured above 19% O₂) (3) make and model of exhaust gas analyzer (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range [District Rule 4309, 5.4] Federally Enforceable Through Title V Permit
- 45 Permittee shall maintain a current file of coatings, inks, adhesives, fountain solutions, wash primers, and solvents in use and in storage. The file shall include material safety data sheet (MSDS) or product data sheet showing the material name, manufacturer's name, VOC content as applied, mixing instruction, and density [District Rule 4607, 6.1.1] Federally Enforceable Through Title V Permit
- 46 The permittee shall record on a daily basis, the type and amount of each coating, adhesive, fountain solution, wash primer, and solvent used [District Rule 4607, 6.1.3] Federally Enforceable Through Title V Permit
- 47 The permittee shall record on a monthly basis, the type and amount of all inks used and their VOC content and densities using one of the methods listed in Rule 4607, Section 6.1.2.1 (12/18/08 version of Rule 4607) [District Rule 4607, 6.1.2.1] Federally Enforceable Through Title V Permit
- 48 The permittee shall record on a monthly basis, the type and amount of each ink, coating, adhesive, wash primer, and solvent used [District Rule 4607, 6.1.2.2] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

- 49 The permittee shall record on a monthly basis the type amount and percent VOC by volume of each fountain solution used [District Rule 4607 6 1 2 3] Federally Enforceable Through Title V Permit
- 50 The permittee shall maintain daily records of the following (1) Quantity of VOC emitted (in pounds) from this printing press, (2) Quantity of natural gas used (in cubic feet) by each drying oven and each thermal oxidizer at the facility (3) Operational temperature of each regenerative thermal oxidizer [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
- 51 The permittee shall maintain monthly records of the quantity of natural gas used (in cubic feet) by the drying ovens under this permit These records shall be used to determine compliance with the rolling 12 consecutive month natural gas usage limit [District Rules 1070 and 2201]
- 52 The permittee shall maintain monthly records of the total VOC emissions from the entire stationary source (excluding permit unit N 1646 34) These records shall be used to determine compliance with the rolling 12 consecutive month VOC limit [District Rules 1070 and 2201]
- 53 All records shall be maintained and retained on-site for a minimum of five (5) years and shall be made available for District inspection upon request [District Rules 1070, 2520 and 4607, and 4309] Federally Enforceable Through Title V Permit
- 54 Each regenerative thermal oxidizer shall be equipped with an operational continuous temperature monitoring and recording instrument [District Rules 2201 2520, 9 3 2 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
- 55 Each regenerative thermal oxidizer shall be operated at a minimum temp of 1400 deg F The regenerative thermal oxidizer shall be preheated to 1400 deg F prior to the start-up of the heatset offset printing operation Upon determining an excursion from this requirement, the permittee shall investigate the excursion and take corrective action to minimize emissions and prevent recurrence of the excursion as expeditiously as practicable [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
- 56 The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR part 64 7 [40 CFR part 64] Federally Enforceable Through Title V Permit
- 57 The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR part 64 9 [40 CFR part 64] Federally Enforceable Through Title V Permit
- 58 If the District or EPA determine that a Quality improvement plan is required under 40 CFR part 64 7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64 8 [40 CFR Part 64] Federally Enforceable Through Title V Permit



AUTHORITY TO CONSTRUCT

PERMIT NO N 1646 37 5

ISSUANCE DATE 02/10/2014

LEGAL OWNER OR OPERATOR QG LLC
MAILING ADDRESS N61 W23044 HARRY S WAY
SUSSEX WI 53089 3995

LOCATION 2201 COOPER AVE
MERCED CA 95348

EQUIPMENT DESCRIPTION

MODIFICATION OF GRAPHIC ARTS PRINTING OPERATION CONSISTING OF ONE MAN ROLAND MODEL ROTOMAN S 64 WIDE 8 COLOR HEATSET OFFSET LITHOGRAPHIC PRINTING PRESS (PRESS #522) WITH ONE 9 4 MMBTU/HR NATURAL GAS MEGTEC MODEL DD III 135 2080 DRYING OVEN #1 AND ONE 9 0 MMBTU/HR NATURAL GAS FIRED MODEL DD III-135 2080 DRYING OVEN #2 EACH VENTED TO THE SHARED 5 728 MMBTU/HR MEGTEC CLEANSWITCH MODEL CS 300-95 NATURAL GAS FIRED REGENERATIVE THERMAL OXIDIZER TO CONVERT THE CURRENT DAILY SPECIFIC LIMITING CONDITION (SLC) FROM 235 6 LB VOC/DAY TO AN ANNUAL SLC OF 85 994 LB-VOC/YEAR IN ADDITION THE CURRENT DAILY EMISSIONS LIMIT WILL BE INCREASED FROM 95 5 LB VOC/DAY TO 105 LB VOC/DAY

CONDITIONS

- 1 This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70 7 and 70 8 and with the compliance requirements of 40 CFR 70 6(c) [District Rule 2201] Federally Enforceable Through Title V Permit
- 2 Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5 3 4 [District Rule 2520, 5 3 4] Federally Enforceable Through Title V Permit
- 3 No air contaminant shall be released into the atmosphere which causes a public nuisance [District Rule 4102]
- 4 Particulate matter emissions shall not exceed 0 1 grains/dscf in concentration [District Rule 4201] Federally Enforceable Through Title V Permit
- 5 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]

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

DAVID WARNER, Director of Permit Services

N-1646-37 5 Feb 10 2014 2 00PM - CHANK Joint Inspection NOT Resub ed

- 6 Total Volatile Organic Compound (VOC) emissions from the entire stationary source (excluding permit unit N 1646 34) shall not exceed 85,994 pounds in any rolling 12 consecutive month period [District Rule 2201]
- 7 Total NOx emissions from the entire stationary source (excluding permit unit N 1646-34) shall not exceed 150 pounds during any one day [District Rule 2201]
- 8 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
- 9 The drying ovens and regenerative thermal oxidizer shall be fired exclusively on natural gas [District Rule 2201] Federally Enforceable Through Title V Permit
- 10 A non-resettable totalizing mass or volumetric fuel flow meter to measure the amount of natural gas combusted in the drying ovens shall be installed utilized and maintained [District Rules 2201] Federally Enforceable Through Title V Permit
- 11 A non-resettable totalizing mass or volumetric fuel flow meter to measure the amount of natural gas combusted in the regenerative thermal oxidizer shall be installed, utilized and maintained [District Rules 2201] Federally Enforceable Through Title V Permit
- 12 The drying ovens serving the heatset offset printing press shall be maintained under negative pressure and shall be vented through the regenerative thermal oxidizer at all times except during periods of start up while the dryers are being air purged [District Rule 2201] Federally Enforceable Through Title V Permit
- 13 The exhaust stack shall vent vertically upward The vertical exhaust flow shall not be impeded by a rain cap (flapper is acceptable) roof overhang or any other obstruction [District Rule 4102] Federally Enforceable Through Title V Permit
- 14 The collection system for the dryer exhausts and for all fugitive VOC emissions shall have a minimum capture efficiency of 90% [District Rule 2201] Federally Enforceable Through Title V Permit
- 15 The regenerative thermal oxidizer shall be operated with a minimum VOC destruction efficiency of 98% [District Rule 2201] Federally Enforceable Through Title V Permit
- 16 The VOC content of organic solvents used to perform surface preparation or cleanup shall not exceed the VOC content limits specified in Table 7 of Rule 4607 (Graphic Arts and Paper Film Foil and Fabric Coatings 12/18/08 version) [District Rule 4607] Federally Enforceable Through Title V Permit
- 17 For a permittee using any solvent containing more than 25 g/L (0.21 lb/gal) of VOC for organic solvent cleaning, cleaning activities shall be by one of the following methods (1) wipe cleaning or (2) application of solvent from hand held spray bottles from which solvents are dispensed without a propellant induced force or (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 4607] Federally Enforceable Through Title V Permit
- 18 Solvents shall not be atomized into the open air unless it is vented to a VOC control device This provision shall not apply to operations where roller or blanket wash is applied automatically and the cleaning of the nozzle tips of automated spray equipment systems, except for robotic systems, and cleaning with nonpropellant induced, hand held spray bottles or containers which solvents are dispensed without a propellant-induced force [District Rule 4607] Federally Enforceable Through Title V Permit
- 19 The permittee shall not use VOC-containing material to clean spray equipment used for the application of coatings, adhesives, or ink unless an enclosed system or equipment that is proven to be equally effective at controlling emissions is used for cleaning If an enclosed system is used, it must totally enclose spray guns, cups, nozzles, bowls, and other parts during washing, rinsing, draining procedures and it must be used according to manufacturer's recommendations and must be closed when not in use [District Rule 4607] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

- 20 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] Federally Enforceable Through Title V Permit
- 21 The permittee shall properly use and operate all graphic arts printing technologies as directed and/or specified by the manufacturer of the printer or graphic arts material [District Rule 4607] Federally Enforceable Through Title V Permit
- 22 The VOC content of the materials shall not exceed the following inks less than 45% VOC by weight (less water and exempt compounds) and fountain solutions less than 15% by volume [District Rule 2201] Federally Enforceable Through Title V Permit
- 23 VOC emissions from the printing inks and solvents shall not exceed 105 0 pounds in any one day [District Rule 2201]
- 24 NOx emissions from the drying ovens shall not exceed 4 3 ppmvd @ 19% O2 (referenced as NO2) or 0 0492 lb NOx/MMBtu [District Rules 2201 & 4309] Federally Enforceable Through Title V Permit
- 25 VOC emission from the drying ovens shall not exceed 0 0055 lb/MMBtu [District Rule 2201] Federally Enforceable Through Title V Permit
- 26 Emissions from the drying ovens shall not exceed any of the following limits 0 00285 lb-SOx/MMBtu 0 0076 lb-PM10/MMBtu or 0 0055 lb VOC/MMBtu [District Rule 2201] Federally Enforceable Through Title V Permit
- 27 NOx emissions from the regenerative thermal oxidizer shall not exceed 4 3 ppmvd @ 19% O2 (referenced as NO2) or 0 0492 lb NOx/MMBtu [District Rules 2201 & 4309] Federally Enforceable Through Title V Permit
- 28 CO emissions from the regenerative thermal oxidizer shall not exceed 25 0 ppmvd @ 19% O2 or 0 174 lb-CO/MMBtu [District Rules 2201 & 4309] Federally Enforceable Through Title V Permit
- 29 Emissions from the regenerative thermal oxidizers shall not exceed any of the following limits 0 00285 lb SOx/MMBtu, 0 0076 lb PM10/MMBtu or 0 0055 lb VOC/MMBtu [District Rule 2201] Federally Enforceable Through Title V Permit
- 30 The total quantity of natural gas used in the drying ovens under this permit unit shall not exceed 137,000 cubic feet in any one day [District Rule 2201] Federally Enforceable Through Title V Permit
- 31 The total quantity of natural gas used in the drying ovens under this permit unit shall not exceed 50 0 million cubic feet in any rolling 12 consecutive month period [District Rule 2201] Federally Enforceable Through Title V Permit
- 32 The total quantity of natural gas used in the regenerative thermal oxidizer shall not exceed 25 0 million cubic feet in any rolling 12 consecutive month period [District Rule 2201] Federally Enforceable Through Title V Permit
- 33 Source testing to demonstrate compliance with the VOC destruction efficiency of the regenerative thermal oxidizer shall be conducted on an annual basis [District Rule 2201] Federally Enforceable Through Title V Permit
- 34 Source testing to determine the destruction efficiency of the regenerative thermal oxidizer shall be conducted using EPA Methods 2 2A or 2D for measuring flow rates and EPA Methods 25 25A, or 25C for measuring total gaseous organic concentrations at the inlet and outlet of the control device [District Rule 4607] Federally Enforceable Through Title V Permit
- 35 Source testing to measure NOx and CO emissions from the drying ovens shall be conducted at the exhaust of the associated regenerative thermal oxidizer at least once every 24 months [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit
- 36 All test results for NOx and CO shall be reported in ppmv @ 19% O2 (or no correction if measured above 19% O2), corrected to dry stack conditions [District Rule 4309] Federally Enforceable Through Title V Permit
- 37 NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis [District Rule 4309] Federally Enforceable Through Title V Permit
- 38 CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100 [District Rule 4309] Federally Enforceable Through Title V Permit
- 39 Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100 [District Rule 4309] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

- 40 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] Federally Enforceable Through Title V Permit
- 41 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] Federally Enforceable Through Title V Permit
- 42 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 Rule 1081] Federally Enforceable Through Title V Permit
- 43 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
- 44 The permittee shall monitor and record the stack concentration of NO_x, CO, and O₂ at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e., the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month [District Rule 4309] Federally Enforceable Through Title V Permit
- 45 If either the NO_x or CO concentrations corrected to 19% O₂ (or no correction if measured above 19% O₂) as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition [District Rule 4309] Federally Enforceable Through Title V Permit
- 46 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 (5) readings, evenly spaced out over the 15 consecutive minute period [District Rule 4309] Federally Enforceable Through Title V Permit
- 47 The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements; (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 19% O₂ (or no correction if measured above 19% O₂); (3) make and model of exhaust gas analyzer; (4) exhaust gas analyzer calibration records; and (5) a description of any corrective action taken to maintain the emissions within the acceptable range [District Rule 4309] Federally Enforceable Through Title V Permit
- 48 Permittee shall maintain a current file of coatings, inks, adhesives, fountain solutions, wash primers, and solvents in use and in storage. The file shall include material safety data sheet (MSDS) or product data sheet showing the material name, manufacturer's name, VOC content as applied, mixing instruction, and density [District Rule 4607] Federally Enforceable Through Title V Permit
- 49 The permittee shall record on a daily basis the type and amount of each coating, adhesive, fountain solution, wash primer, and solvent used [District Rule 2201 & 4607] Federally Enforceable Through Title V Permit
- 50 The permittee shall record on a monthly basis, the type and amount of all inks used and their VOC content and densities, using one of the methods listed in Rule 4607, Section 6.1.2.1 (12/18/08 version of Rule 4607) [District Rule 4607] Federally Enforceable Through Title V Permit
- 51 The permittee shall record on a monthly basis, the type and amount of each ink, coating, adhesive, wash primer, and solvent used [District Rule 4607] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

- 52 The permittee shall record on a monthly basis the type, amount and percent VOC by volume of each fountain solution used [District Rule 4607] Federally Enforceable Through Title V Permit
- 53 The permittee shall maintain daily records of the following (1) Quantity of VOC emitted (in pounds) from this printing press, (2) Quantity of natural gas used (in cubic feet) by each drying oven and each thermal oxidizer at the facility (3) Operational temperature of each thermal oxidizer [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
- 54 The permittee shall maintain monthly records of the quantity of natural gas used (in cubic feet) by the drying ovens under this permit and the regenerative thermal oxidizer serving this permit These records shall be used to determine compliance with the rolling 12 consecutive month natural gas usage limits [District Rules 1070 and 2201]
- 55 The permittee shall maintain monthly records of the total VOC emissions from the entire stationary source (excluding permit unit N 1646 34) These records shall be used to determine compliance with the rolling 12 consecutive month VOC limit [District Rules 1070 and 2201]
- 56 All records shall be maintained and retained on-site for a minimum of five (5) years and shall be made available for District inspection upon request [District Rules 1070 and 4309] Federally Enforceable Through Title V Permit
- 57 The regenerative thermal oxidizer shall be equipped with an operational continuous temperature monitoring and recording instrument [District Rules 2201 2520 9 3 2 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
- 58 The regenerative thermal oxidizer shall be operated at a minimum temp of 1400 deg F The regenerative thermal oxidizer shall be preheated to 1400 deg F prior to the start up of the heatset offset printing operation Upon determining an excursion from this requirement, the permittee shall investigate the excursion and take corrective action to minimize emissions and prevent recurrence of the excursion as expeditiously as practicable [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
- 59 The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR part 64 7 [40 CFR part 64] Federally Enforceable Through Title V Permit
- 60 The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR part 64 9 [40 CFR part 64] Federally Enforceable Through Title V Permit
- 61 If the District or EPA determine that a Quality improvement plan is required under 40 CFR part 64 7(d)(2) the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64 8 [40 CFR Part 64] Federally Enforceable Through Title V Permit



AUTHORITY TO CONSTRUCT

PERMIT NO N 1646 38 7

ISSUANCE DATE 02/10/2014

LEGAL OWNER OR OPERATOR QG LLC
MAILING ADDRESS N61 W23044 HARRY S WAY
SUSSEX WI 53089-3995

LOCATION 2201 COOPER AVE
MERCED CA 95348

EQUIPMENT DESCRIPTION

MODIFICATION OF GRAPHIC ARTS PRINTING OPERATION CONSISTING OF ONE MAN ROLAND MODEL ROTOMAN S 64' WIDE 8 COLOR HEATSET OFFSET LITHOGRAPHIC PRINTING PRESS (PRESS #523) WITH ONE 9 4 MMBTU/HR NATURAL GAS FIRED MEGTEC MODEL DD III 135 2080 DRYING OVEN #1 (WITH MAXON LOW NOX BURNERS) AND ONE 9 0 MMBTU/HR NATURAL GAS FIRED MEGTEC MODEL DD III-135-2080 DRYING OVEN #2 (WITH MAXON LOW NOX BURNERS) EACH SERVED BY THE SHARED 9 5 MMBTU/HR MEGTEC ENTERPRISE II OR THE 18 MMBTU/HR REECO RETHERM MODEL E NATURAL GAS FIRED REGENERATIVE THERMAL OXIDIZERS TO CONVERT THE CURRENT DAILY SPECIFIC LIMITING CONDITION (SLC) FROM 235 6 LB VOC/DAY AN ANNUAL SLC OF 85 994 LB VOC/YEAR IN ADDITION THE CURRENT DAILY EMISSIONS LIMIT WILL BE INCREASED FROM 95 5 LB VOC/DAY TO 105 LB VOC/DAY

CONDITIONS

- 1 This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70 7 and 70 8 and with the compliance requirements of 40 CFR 70 6(c) [District Rule 2201] Federally Enforceable Through Title V Permit
- 2 Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5 3 4 [District Rule 2520, 5 3 4] Federally Enforceable Through Title V Permit
- 3 No air contaminant shall be released into the atmosphere which causes a public nuisance [District Rule 4102]
- 4 Particulate matter emissions shall not exceed 0 1 grains/dscf in concentration [District Rule 4201] Federally Enforceable Through Title V Permit
- 5 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]

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.

Sayed Sadredin, Executive Director / APCD

DAVID WARNER Director of Permit Services
AL-1646-38-7 Feb 10 2014 2:00PM - CHANK Jctn I pction NOT Required

- 6 Total Volatile Organic Compound (VOC) emissions from the entire stationary source (excluding permit unit N 1646 34) shall not exceed 85 994 pounds in any rolling 12 consecutive month period [District Rule 2201]
- 7 Total NOx emissions from the entire stationary source (excluding permit unit N 1646 34) shall not exceed 150 pounds during any one day [District Rule 2201]
- 8 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
- 9 The drying ovens and regenerative thermal oxidizers shall be fired exclusively on natural gas [District Rule 2201] Federally Enforceable Through Title V Permit
- 10 A non resettable, totalizing mass or volumetric fuel flow meter to measure the amount of natural gas combusted in each drying oven shall be installed, utilized and maintained [District Rules 2201] Federally Enforceable Through Title V Permit
- 11 The drying ovens serving the heatset offset printing press shall be maintained under negative pressure and shall be vented through the thermal oxidizer at all times except during periods of start up while the dryers are being air purged [District Rule 2201] Federally Enforceable Through Title V Permit
- 12 The exhaust stack shall vent vertically upward The vertical exhaust flow shall not be impeded by a rain cap (flapper is acceptable), roof overhang or any other obstruction [District Rule 4102]
- 13 The collection system for the dryer exhausts and for all fugitive VOC emissions shall have a minimum capture efficiency of 90% [District Rules 2201 and 4607, 5 6] Federally Enforceable Through Title V Permit
- 14 Each thermal oxidizer shall be operated with a minimum VOC destruction efficiency of 98% [District Rules 2201 and 4607, 5 6] Federally Enforceable Through Title V Permit
- 15 The VOC content of organic solvents used to perform surface preparation or solvent cleaning shall not exceed the VOC content limits specified in Table 7 of Rule 4607 (Graphic Arts and Paper Film Foil and Fabric Coatings - 12/18/08 version) [District Rule 4607 5 8 1] Federally Enforceable Through Title V Permit
- 16 For a permittee using any solvent containing more than 25 g/L (0 21 lb/gal) of VOC for organic solvent cleaning, cleaning activities shall be by one of the following methods (1) wipe cleaning or (2) application of solvent from hand held spray bottles from which solvents are dispensed without a propellant induced force or (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 4607 5 8 3] Federally Enforceable Through Title V Permit
- 17 For a permittee using any solvent containing more than 25 g/L (0 21 lb/gal) of VOC for organic solvent cleaning, solvent shall not be atomized into the open air unless it is vented to a VOC control device This provision shall not apply to operations where roller or blanket wash is applied automatically and the cleaning of the nozzle tips of automated spray equipment systems except for robotic systems and cleaning with nonpropellant induced, hand held spray bottles or containers which solvents are dispensed without a propellant-induced force [District Rule 4607, 5 8 4] Federally Enforceable Through Title V Permit
- 18 For a permittee using any solvent containing more than 25 g/L (0 21 lb/gal) of VOC for organic solvent cleaning, the permittee shall not use VOC containing material to clean spray equipment used for the application of coatings, adhesives, or ink unless an enclosed system or equipment that is proven to be equally effective at controlling emissions is used for cleaning If an enclosed system is used, it must totally enclose spray guns, cups nozzles, bowls, and other parts during washing rinsing draining procedures, and it must be used according to manufacturer's recommendations and must be closed when not in use [District Rule 4607, 5 8 5] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

- 19 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 5 9] Federally Enforceable Through Title V Permit
- 20 The permittee shall properly use and operate all graphic arts printing technologies as directed and/or specified by the manufacturer of the printer or graphic arts material [District Rule 4607 5 10] Federally Enforceable Through Title V Permit
- 21 The VOC content of the materials shall not exceed the following inks less than 45% VOC by weight (less water and exempt compounds) and fountain solutions less than 15% by volume [District Rule 2201] Federally Enforceable Through Title V Permit
- 22 VOC emissions from the printing inks and solvents shall not exceed 105 0 pounds in any one day [District Rule 2201]
- 23 NOx emissions from the drying ovens shall not exceed 4 3 ppmvd @ 19% O2 (referenced as NO2) [District Rules 2201 & 4309 5 2] Federally Enforceable Through Title V Permit
- 24 CO emissions from the drying ovens shall not exceed 25 0 ppmvd @ 19% O2 [District Rules 2201 & 4309, 5 2] Federally Enforceable Through Title V Permit
- 25 Emissions from the drying ovens shall not exceed any of the following limits 0 00285 lb SOx/MMBtu, 0 0076 lb PM10/MMBtu, or 0 0055 lb VOC/MMBtu [District Rule 2201] Federally Enforceable Through Title V Permit
- 26 NOx emissions from the regenerative thermal oxidizers shall not exceed 4 3 ppmvd @ 19% O2 (referenced as NO2) [District Rules 2201 & 4309, 5 2] Federally Enforceable Through Title V Permit
- 27 CO emissions from the regenerative thermal oxidizers shall not exceed 25 0 ppmvd @ 19% O2 [District Rules 2201 & 4309 5 2] Federally Enforceable Through Title V Permit
- 28 Emissions from the regenerative thermal oxidizers shall not exceed any of the following limits 0 00285 lb SOx/MMBtu 0 0076 lb-PM10/MMBtu or 0 0055 lb-VOC/MMBtu [District Rule 2201] Federally Enforceable Through Title V Permit
- 29 The total quantity of natural gas used in the drying ovens under this permit unit shall not exceed 137,000 cubic feet in any one day [District Rule 2201] Federally Enforceable Through Title V Permit
- 30 The total quantity of natural gas used in the drying ovens under this permit unit shall not exceed 50 0 million cubic feet in any 12 consecutive month period [District Rule 2201]
- 31 Source testing to demonstrate compliance with the VOC destruction efficiency of each regenerative thermal oxidizer shall be conducted on an annual basis [District NSR Rule] Federally Enforceable Through Title V Permit
- 32 Source testing to determine the destruction efficiency of each regenerative thermal oxidizer shall be conducted using EPA Methods 2 2A or 2D for measuring flow rates and EPA Methods 25, 25A or 25C for measuring total gaseous organic concentrations at the inlet and outlet of the control device [District Rule 4607 6 4 7] Federally Enforceable Through Title V Permit
- 33 Source testing to measure NOx and CO emissions from the drying ovens shall be conducted at the exhaust of the associated regenerative thermal oxidizer at least once every 24 months [District Rules 2201 and 4309 6 3 2] Federally Enforceable Through Title V Permit
- 34 All test results for NOx and CO shall be reported in ppmv @ 19% O2 (or no correction if measured above 19% O2), corrected to dry stack conditions [District Rule 4309, 6 3 7] Federally Enforceable Through Title V Permit
- 35 NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis [District Rule 4309, 6 2] Federally Enforceable Through Title V Permit
- 36 CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100 [District Rule 4309 6 2] Federally Enforceable Through Title V Permit
- 37 Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100 [District Rule 4309, 6 2] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

- 38 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, 5.5.1 & 5.5.2] Federally Enforceable Through Title V Permit
- 39 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, 5.5.6] Federally Enforceable Through Title V Permit
- 40 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 Rule 1081] Federally Enforceable Through Title V Permit
- 41 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
- 42 The permittee shall monitor and record the stack concentration of NO_x, CO, and O₂ at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month [District Rule 4309, 5.4] Federally Enforceable Through Title V Permit
- 43 If either the NO_x or CO concentrations corrected to 19% O₂ (or no correction if measured above 19% O₂), as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition [District Rule 4309, 5.4] Federally Enforceable Through Title V Permit
- 44 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, 5.4] Federally Enforceable Through Title V Permit
- 45 The permittee shall maintain records of (1) the date and time of NO_x, CO, and O₂ measurements (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 19% O₂ (or no correction if measured above 19% O₂) (3) make and model of exhaust gas analyzer (4) exhaust gas analyzer calibration records and (5) a description of any corrective action taken to maintain the emissions within the acceptable range [District Rule 4309, 5.4] Federally Enforceable Through Title V Permit
- 46 Permittee shall maintain a current file of coatings, inks, adhesives, fountain solutions, wash primers, and solvents in use and in storage. The file shall include material safety data sheet (MSDS) or product data sheet showing the material name, manufacturer's name, VOC content as applied, mixing instruction, and density [District Rule 4607, 6.1.1] Federally Enforceable Through Title V Permit
- 47 The permittee shall record on a daily basis the type and amount of each coating, adhesive, fountain solution, wash primer, and solvent used [District Rule 4607, 6.1.3] Federally Enforceable Through Title V Permit
- 48 The permittee shall record on a monthly basis the type and amount of all inks used and their VOC content and densities using one of the methods listed in Rule 4607, Section 6.1.2.1 (12/18/08 version of Rule 4607) [District Rule 4607, 6.1.2.1] Federally Enforceable Through Title V Permit
- 49 The permittee shall record on a monthly basis, the type and amount of each ink, coating, adhesive, wash primer, and solvent used [District Rule 4607, 6.1.2.2] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

- 50 The permittee shall record on a monthly basis the type amount and percent VOC by volume of each fountain solution used [District Rule 4607, 6 1 2 3] Federally Enforceable Through Title V Permit
- 51 The permittee shall maintain daily records of the following (1) Quantity of VOC emitted (in pounds) from this printing press, (2) Quantity of natural gas used (in cubic feet) by each drying oven and each thermal oxidizer at the facility (3) Operational temperature of each regenerative thermal oxidizer [District Rules 1070 and 2201]
- 52 The permittee shall maintain monthly records of the quantity of natural gas used (in cubic feet) by the drying ovens under this permit These records shall be used to determine compliance with the rolling 12 consecutive month natural gas usage limit [District Rules 1070 and 2201]
- 53 The permittee shall maintain monthly records of the total VOC emissions from the entire stationary source (excluding permit unit N 1646 34) These records shall be used to determine compliance with the rolling 12 consecutive month VOC limit [District Rules 1070 and 2201]
- 54 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 1070, 2520, and 4607, and 4309] Federally Enforceable Through Title V Permit
- 55 Each regenerative thermal oxidizer shall be equipped with an operational continuous temperature monitoring and recording instrument [District , Rules 2201 2520, 9 3 2 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
- 56 Each regenerative thermal oxidizer shall be operated at a minimum temp of 1400 deg F The regenerative thermal oxidizer shall be preheated to 1400 deg F prior to the start up of the heatset offset printing operation Upon determining an excursion from this requirement the permittee shall investigate the excursion and take corrective action to minimize emissions and prevent recurrence of the excursion as expeditiously as practicable [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
- 57 The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR part 64 7 [40 CFR part 64] Federally Enforceable Through Title V Permit
- 58 The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR part 64 9 [40 CFR part 64] Federally Enforceable Through Title V Permit
- 59 If the District or EPA determine that a Quality improvement plan is required under 40 CFR part 64 7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64 8 [40 CFR Part 64] Federally Enforceable Through Title V Permit



AUTHORITY TO CONSTRUCT

PERMIT NO N 1646 39 8

ISSUANCE DATE 02/10/2014

LEGAL OWNER OR OPERATOR QG LLC
MAILING ADDRESS N61 W23044 HARRY S WAY
SUSSEX WI 53089-3995

LOCATION 2201 COOPER AVE
MERCED CA 95348

EQUIPMENT DESCRIPTION

MODIFICATION OF GRAPHIC ARTS PRINTING OPERATION CONSISTING OF ONE MAN ROLAND MODEL ROTOMAN N 38 WIDE 5 COLOR HEATSET OFFSET LITHOGRAPHIC PRINTING PRESS (PRESS #524) WITH ONE 4 587 MMBTU/HR NATURAL GAS FIRED THERMO WISCONSIN MODEL APOLLO A3100 DRYING OVEN SERVED BY THE SHARED 5 728 MMBTU/HR MEGTEC CLEANSWITCH MODEL CS-300-95 NATURAL GAS FIRED REGENERATIVE THERMAL OXIDIZER AND ONE WORLD WIDE GRAPHICS MODEL WWG DAF-1500 AQUEOUS/UV COATER WITH A RADIANT CURING UNIT AND PRIME UV 6 LAMP CURING SYSTEM TO CONVERT THE CURRENT DAILY SPECIFIC LIMITING CONDITION (SLC) FROM 235 6 LB VOC/DAY TO AN ANNUAL SLC OF 85 994 LB-VOC/YEAR IN ADDITION THE CURRENT DAILY EMISSIONS LIMIT WILL BE INCREASED FROM 27 5 LB VOC/DAY TO 40 LB-VOC/DAY

CONDITIONS

- 1 This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70 7 and 70 8 and with the compliance requirements of 40 CFR 70 6(c) [District Rule 2201] Federally Enforceable Through Title V Permit
- 2 Prior to operating with modifications authorized by this Authority to Construct the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5 3 4 [District Rule 2520, 5 3 4] Federally Enforceable Through Title V Permit
- 3 No air contaminant shall be released into the atmosphere which causes a public nuisance [District Rule 4102]
- 4 Particulate matter emissions shall not exceed 0 1 grains/dscf in concentration [District Rule 4201] Federally Enforceable Through Title V Permit
- 5 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]

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

Sayed Sadredin, Executive Director, APACO

DAVID WAGNER, Director of Permit Services
N-1646 39-8 Feb 10 2014 2:00PM CHANK J I I Inspection NOT Required

- 6 Total Volatile Organic Compound (VOC) emissions from the entire stationary source (excluding permit unit N-1646-34) shall not exceed 85,994 pounds in any rolling 12 consecutive month period [District Rule 2201]
- 7 Total NOx emissions from the entire stationary source (excluding permit unit N 1646-34) shall not exceed 150 pounds during any one day [District Rule 2201]
- 8 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
- 9 The drying oven and thermal oxidizer shall be fired exclusively on natural gas [District NSR Rule] Federally Enforceable Through Title V Permit
- 10 A non resettable totalizing mass or volumetric fuel flow meter to measure the amount of natural gas combusted in the drying oven shall be installed, utilized and maintained [District Rule 2201] Federally Enforceable Through Title V Permit
- 11 A non resettable, totalizing mass or volumetric fuel flow meter to measure the amount of natural gas combusted in the thermal oxidizer shall be installed, utilized and maintained [District Rule 2201] Federally Enforceable Through Title V Permit
- 12 The drying ovens serving the heatset offset printing press shall be maintained under negative pressure and shall be vented through the thermal oxidizer at all times except during periods of start-up while the dryers are being air purged [District Rule 2201] Federally Enforceable Through Title V Permit
- 13 The exhaust stack shall vent vertically upward The vertical exhaust flow shall not be impeded by a rain cap roof overhang, or any other obstruction [District Rule 4102]
- 14 The collection system for the dryer exhausts and for all fugitive VOC emissions shall have a minimum capture efficiency of 90% [District NSR Rule and 4607 5 6] Federally Enforceable Through Title V Permit
- 15 The thermal oxidizer shall be operated with a minimum VOC destruction efficiency of 98% [District NSR Rule and 4607 5 6] Federally Enforceable Through Title V Permit
- 16 The VOC content of organic solvents used to perform surface preparation or cleanup shall not exceed the VOC content limits specified in Table 7 of Rule 4607 (Graphic Arts and Paper Film, Foil and Fabric Coatings 12/18/08 version) [District Rule 4607, 5 8 1] Federally Enforceable Through Title V Permit
- 17 For a permittee using any solvent containing more than 25 g/L (0 21 lb/gal) of VOC for organic solvent cleaning cleaning activities shall be by one of the following methods (1) wipe cleaning or (2) application of solvent from hand held spray bottles from which solvents are dispensed without a propellant-induced force or (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 4607 5 8 3] Federally Enforceable Through Title V Permit
- 18 For a permittee using any solvent containing more than 25 g/L (0 21 lb/gal) of VOC for organic solvent cleaning, solvent shall not be atomized into the open air unless it is vented to a VOC control device This provision shall not apply to operations where roller or blanket wash is applied automatically and the cleaning of the nozzle tips of automated spray equipment systems, except for robotic systems and cleaning with nonpropellant induced hand-held spray bottles or containers which solvents are dispensed without a propellant induced force [District Rule 4607, 5 8 4] Federally Enforceable Through Title V Permit
- 19 For a permittee using any solvent containing more than 25 g/L (0 21 lb/gal) of VOC for organic solvent cleaning, the permittee shall not use VOC containing material to clean spray equipment used for the application of coatings, adhesives or ink unless an enclosed system or equipment that is proven to be equally effective at controlling emissions is used for cleaning If an enclosed system is used, it must totally enclose spray guns cups nozzles, bowls, and other parts during washing rinsing, draining procedures, and it must be used according to manufacturer's recommendations and must be closed when not in use [District Rule 4607, 5 8 5] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

- 20 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, 5 9] Federally Enforceable Through Title V Permit
- 21 The permittee shall properly use and operate all graphic arts printing technologies as directed and/or specified by the manufacturer of the printer or graphic arts material [District Rule 4607, 5 10] Federally Enforceable Through Title V Permit
- 22 The VOC content of the materials shall not exceed the following inks less than 45% VOC by weight (less water and exempt compounds) and fountain solutions less than 15% by volume [District NSR Rule] Federally Enforceable Through Title V Permit
- 23 VOC emissions from the printing inks and solvents shall not exceed 40 0 pounds in any one day [District Rule 2201] Federally Enforceable Through Title V Permit
- 24 NO_x emissions from the drying oven shall not exceed 4 3 ppmvd @ 19% O₂ (referenced as NO₂) [District Rule 2201] Federally Enforceable Through Title V Permit
- 25 CO emissions from the drying oven shall not exceed 25 0 ppmvd @ 19% O₂ [District Rule 2201] Federally Enforceable Through Title V Permit
- 26 Emissions from the drying oven shall not exceed any of the following limits 0 00285 lb-SO_x/MMBtu, 0 0076 lb-PM₁₀/MMBtu or 0 0055 lb VOC/MMBtu [District Rule 2201] Federally Enforceable Through Title V Permit
- 27 NO_x emissions from the regenerative thermal oxidizer shall not exceed 4 3 ppmvd @ 19% O₂ (referenced as NO₂) [District Rule 2201] Federally Enforceable Through Title V Permit
- 28 CO emissions from the regenerative thermal oxidizer shall not exceed 25 0 ppmvd @ 19% O₂ [District Rule 2201] Federally Enforceable Through Title V Permit
- 29 Emissions from the regenerative thermal oxidizer shall not exceed any of the following limits 0 00285 lb SO_x/MMBtu 0 0076 lb PM₁₀/MMBtu, or 0 0055 lb VOC/MMBtu [District Rule 2201] Federally Enforceable Through Title V Permit
- 30 The total quantity of natural gas used in the drying oven under this permit unit shall not exceed 11 651 million cubic feet in any 12 consecutive month period [District Rule 2201] Federally Enforceable Through Title V Permit
- 31 The total quantity of natural gas used in the thermal oxidizer shall not exceed 25 0 million cubic feet in any 12 consecutive month period [District Rule 2201] Federally Enforceable Through Title V Permit
- 32 Source testing to demonstrate compliance with the VOC destruction efficiency of each regenerative thermal oxidizer shall be conducted on an annual basis [District Rule 2201] Federally Enforceable Through Title V Permit
- 33 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, 7 1] Federally Enforceable Through Title V Permit
- 34 The results of each source test shall be submitted to the District within 60 days thereafter [District Rule 1081, 7 3] Federally Enforceable Through Title V Permit
- 35 Source testing to determine the destruction efficiency of each regenerative thermal oxidizer shall be conducted using EPA Methods 2 2A or 2D for measuring flow rates and EPA Methods 25, 25A or 25C for measuring total gaseous organic concentrations at the inlet and outlet of the control device [District Rule 4607, 6 4 7] Federally Enforceable Through Title V Permit
- 36 Permittee shall maintain a current file of coatings, inks adhesives, fountain solutions, wash primers, and solvents in use and in storage The file shall include material safety data sheet (MSDS) or product data sheet showing the material name, manufacturer's name, VOC content as applied, mixing instruction and density [District Rule 4607, 6 1 1] Federally Enforceable Through Title V Permit
- 37 The permittee shall record on a daily basis the type and amount of each coating, adhesive, fountain solution, wash primer, and solvent used [District Rule 4607, 6 1 3] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

- 38 The permittee shall record on a monthly basis the type and amount of all inks used and their VOC content and densities using one of the methods listed in Rule 4607 Section 6 1 2 1 (12/18/08 version of Rule 4607) [District Rule 4607 6 1 2 1] Federally Enforceable Through Title V Permit
- 39 The permittee shall record on a monthly basis, the type and amount of each ink, coating, adhesive, wash primer, and solvent used [District Rule 4607, 6 1 2 2] Federally Enforceable Through Title V Permit
- 40 The permittee shall record on a monthly basis, the type amount and percent VOC by volume of each fountain solution used [District Rule 4607 6 1 2 3] Federally Enforceable Through Title V Permit
- 41 The permittee shall maintain daily records of the following (1) Quantity of VOC emitted (in pounds) from this printing press (2) Quantity of natural gas used (in cubic feet) by each drying oven and each thermal oxidizer at the facility (3) Operational temperature of the regenerative thermal oxidizer [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
- 42 The permittee shall maintain monthly records of the quantity of natural gas used (in cubic feet) by the drying ovens under this permit and the regenerative thermal oxidizer serving this permit These records shall be used to determine compliance with the rolling 12 consecutive month natural gas usage limits [District Rules 1070 and 2201]
- 43 The permittee shall maintain monthly records of the total VOC emissions from the entire stationary source (excluding permit unit N 1646 34) These records shall be used to determine compliance with the rolling 12 consecutive month VOC limit [District Rules 1070 and 2201]
- 44 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 1070 2520 and 4607] Federally Enforceable Through Title V Permit
- 45 The regenerative thermal oxidizer shall be equipped with an operational continuous temperature monitoring and recording instrument [District , Rules 2201, 2520 9 3 2, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
- 46 The regenerative thermal oxidizer shall be operated at a minimum temp of 1400 deg F The regenerative thermal oxidizer shall be preheated to 1400 deg F prior to the start up of the heatset offset printing operation Upon determining an excursion from this requirement, the permittee shall investigate the excursion and take corrective action to minimize emissions and prevent recurrence of the excursion as expeditiously as practicable [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
- 47 The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR part 64 7 [40 CFR part 64] Federally Enforceable Through Title V Permit
- 48 The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR part 64 9 [40 CFR part 64] Federally Enforceable Through Title V Permit
- 49 If the District or EPA determine that a Quality improvement plan is required under 40 CFR part 64 7(d)(2) the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64 8 [40 CFR Part 64] Federally Enforceable Through Title V Permit



AUTHORITY TO CONSTRUCT

PERMIT NO N 1646-45 1

ISSUANCE DATE 02/10/2014

LEGAL OWNER OR OPERATOR QG LLC
MAILING ADDRESS N61 W23044 HARRY S WAY
SUSSEX WI 53089-3995

LOCATION 2201 COOPER AVE
MERCED CA 95348

EQUIPMENT DESCRIPTION

MODIFICATION OF GRAPHIC ARTS PRINTING OPERATION CONSISTING OF ONE MAN ROLAND MODEL ROTOMAN S 72 WIDE WEB FED 8 PRINTING UNITS HEATSET OFFSET LITHOGRAPHIC PRINTING PRESS (PRESS #MR516) AND TWO 13 7 MMBTU/HR NATURAL GAS FIRED MEGTEC MODEL DDIII-153-2083-1830 DRYING OVENS (EACH CONSISTS OF ONE 10 5 MMBTU/HR MAXON OPTIMA SLS ULTRA LOW NOX BURNER AND TWO 1 6 MMBTU/HR MAXON CYCLOMAX LOW NOX BURNERS) SERVED BY THE SHARED 9 5 MMBTU/HR MEGTEC ENTERPRISE II OR THE 18 MMBTU/HR REECO RETHERM MODEL E NATURAL GAS FIRED REGENERATIVE THERMAL OXIDIZERS TO CONVERT THE CURRENT DAILY SPECIFIC LIMITING CONDITIONS (SLC) FROM 235 6 LB VOC/DAY TO AN ANNUAL SLC OF 85 994 LB-VOC/YEAR IN ADDITION THE CURRENT DAILY EMISSIONS LIMIT WILL BE INCREASED FROM 74 1 LB-VOC/DAY TO 105 LB VOC/DAY

CONDITIONS

- 1 This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70 7 and 70 8 and with the compliance requirements of 40 CFR 70 6(c) [District Rule 2201] Federally Enforceable Through Title V Permit
- 2 Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5 3 4 [District Rule 2520 5 3 4] Federally Enforceable Through Title V Permit
- 3 No air contaminant shall be released into the atmosphere which causes a public nuisance [District Rule 4102]
- 4 Particulate matter emissions shall not exceed 0 1 grains/dscf in concentration [District Rule 4201] Federally Enforceable Through Title V Permit
- 5 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]

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 Sadreddin Executive Director APCO

DAVID WARNER Director of Permit Services

N 1646-45-1 Feb 10 2014 2:00PM - CHANK J Int Inspect NOT R quired

- 6 Total Volatile Organic Compound (VOC) emissions from the entire stationary source (excluding permit unit N 1646 34) shall not exceed 85 994 pounds in any rolling 12 consecutive month period [District Rule 2201]
- 7 Total NOx emissions from the entire stationary source (excluding permit unit N-1646-34) shall not exceed 150 pounds during any one day [District Rule 2201]
- 8 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
- 9 The drying ovens and regenerative thermal oxidizers shall be fired exclusively on natural gas [District Rule 2201] Federally Enforceable Through Title V Permit
- 10 A non resettable totalizing mass or volumetric fuel flow meter to measure the amount of natural gas combusted in each drying oven shall be installed utilized and maintained [District Rule 2201] Federally Enforceable Through Title V Permit
- 11 The drying ovens serving the heatset offset printing press shall be maintained under negative pressure and shall be vented through the regenerative thermal oxidizer at all times except during periods of start-up while the dryers are being air purged [District Rule 2201] Federally Enforceable Through Title V Permit
- 12 The exhaust stack of the regenerative thermal oxidizer shall vent vertically upward The vertical exhaust flow shall not be impeded by a rain cap (flapper is acceptable) roof overhang or any other obstruction [District Rule 4102]
- 13 The collection system for the dryer exhausts and for all fugitive VOC emissions shall have a minimum capture efficiency of 90% [District Rules 2201 and 4607] Federally Enforceable Through Title V Permit
- 14 Each regenerative thermal oxidizer shall be operated with a minimum VOC destruction efficiency of 98% [District Rules 2201 and 4607] Federally Enforceable Through Title V Permit
- 15 The VOC content of organic solvents used to perform surface preparation or cleanup shall not exceed the VOC content limits specified in Table 7 of Rule 4607 (Graphic Arts and Paper, Film, Foil, and Fabric Coatings) [District Rule 4607] Federally Enforceable Through Title V Permit
- 16 For a permittee using any solvent containing more than 25 g/L (0.21 lb/gal) of VOC for organic solvent cleaning, cleaning activities shall be by one of the following methods (1) wipe cleaning or (2) application of solvent from hand held spray bottles from which solvents are dispensed without a propellant induced force or (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 4607] Federally Enforceable Through Title V Permit
- 17 For a permittee using any solvent containing more than 25 g/L (0.21 lb/gal) of VOC for organic solvent cleaning, solvent shall not be atomized into the open air unless it is vented to a VOC control device This provision shall not apply to operations where roller or blanket wash is applied automatically and the cleaning of the nozzle tips of automated spray equipment systems except for robotic systems, and cleaning with nonpropellant-induced, hand held spray bottles or containers which solvents are dispensed without a propellant induced force [District Rule 4607] Federally Enforceable Through Title V Permit
- 18 For a permittee using any solvent containing more than 25 g/L (0.21 lb/gal) of VOC for organic solvent cleaning the permittee shall not use VOC-containing material to clean spray equipment used for the application of coatings, adhesives, or ink, unless an enclosed system or equipment that is proven to be equally effective at controlling emissions is used for cleaning If an enclosed system is used, it must totally enclose spray guns, cups, nozzles, bowls, and other parts during washing, rinsing draining procedures and it must be used according to manufacturer's recommendations and must be closed when not in use [District Rule 4607] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

- 19 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] Federally Enforceable Through Title V Permit
- 20 The permittee shall properly use and operate all graphic arts printing technologies as directed and/or specified by the manufacturer of the printer or graphic arts material [District Rule 4607] Federally Enforceable Through Title V Permit
- 21 The VOC content of the materials shall not exceed any of the following High-end graphics heatset inks shall have a VOC content less than 45 percent by weight (less water and exempt compounds) and fountain solutions shall have a VOC content less than 15 percent by volume [District Rule 2201] Federally Enforceable Through Title V Permit
- 22 VOC emissions from the printing inks and solvents shall not exceed 105 0 pounds in any one day [District Rule 2201]
- 23 NOx emissions from the drying ovens shall not exceed 4 3 ppmvd @ 19% O2 (referenced as NO2) [District Rules 2201 & 4309] Federally Enforceable Through Title V Permit
- 24 CO emissions from the drying ovens shall not exceed 20 0 ppmvd @ 19% O2 [District Rules 2201 & 4309] Federally Enforceable Through Title V Permit
- 25 Emissions from the drying ovens shall not exceed any of the following limits 0 00285 lb SOx/MMBtu, 0 0076 lb PM10/MMBtu, or 0 0055 lb VOC/MMBtu [District Rule 2201] Federally Enforceable Through Title V Permit
- 26 NOx emissions from the regenerative thermal oxidizers shall not exceed 4 3 ppmvd @ 19% O2 (referenced as NO2) [District Rules 2201] Federally Enforceable Through Title V Permit
- 27 CO emissions from the regenerative thermal oxidizers shall not exceed 25 0 ppmvd @ 19% O2 [District Rules 2201] Federally Enforceable Through Title V Permit
- 28 Emissions from the regenerative thermal oxidizers shall not exceed any of the following limits 0 00285 lb SOx/MMBtu 0 0076 lb-PM10/MMBtu or 0 0055 lb VOC/MMBtu [District Rule 2201] Federally Enforceable Through Title V Permit
- 29 The total quantity of natural gas used in each drying oven shall not exceed 95 9 million cubic feet in any rolling 12 consecutive month period [District Rule 2201] Federally Enforceable Through Title V Permit
- 30 Source testing to demonstrate compliance with the VOC destruction efficiency of each regenerative thermal oxidizer shall be conducted on an annual basis [District Rule 2201] Federally Enforceable Through Title V Permit
- 31 Source testing to determine the destruction efficiency of each regenerative thermal oxidizer shall be conducted using EPA Methods 2, 2A or 2D for measuring flow rates and EPA Methods 25 25A or 25C for measuring total gaseous organic concentrations at the inlet and outlet of the control device [District Rule 4607] Federally Enforceable Through Title V Permit
- 32 Source testing to measure NOx and CO emissions from the drying ovens shall be conducted at the exhaust of the associated regenerative thermal oxidizer at least once every 24 months [District Rules 2201 and 4309]
- 33 All test results for NOx and CO shall be reported in ppmv @ 19% O2 (or no correction if measured above 19% O2), corrected to dry stack conditions [District Rule 4309] Federally Enforceable Through Title V Permit
- 34 NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis [District Rule 4309] Federally Enforceable Through Title V Permit
- 35 CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100 [District Rule 4309] Federally Enforceable Through Title V Permit
- 36 Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100 [District Rule 4309] Federally Enforceable Through Title V Permit
- 37 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] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

- 38 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] Federally Enforceable Through Title V Permit
- 39 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 Rule 1081] Federally Enforceable Through Title V Permit
- 40 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
- 41 The permittee shall monitor and record the stack concentration of NO_x, CO, and O₂ at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month [District Rule 4309] Federally Enforceable Through Title V Permit
- 42 If either the NO_x or CO concentrations corrected to 19% O₂ (or no correction if measured above 19% O₂), as measured by the portable analyzer, exceed the allowable emissions concentration the permittee shall return the emissions to within the acceptable range as soon as possible but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100 the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition [District Rule 4309] Federally Enforceable Through Title V Permit
- 43 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] Federally Enforceable Through Title V Permit
- 44 The permittee shall maintain records of (1) the date and time of NO_x, CO and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 19% O₂ (or no correction if measured above 19% O₂), (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records and (5) a description of any corrective action taken to maintain the emissions within the acceptable range [District Rule 4309] Federally Enforceable Through Title V Permit
- 45 Permittee shall maintain a current file of coatings inks, adhesives, fountain solutions wash primers and solvents in use and in storage. The file shall include material safety data sheet (MSDS) or product data sheet showing the material name manufacturer's name VOC content as applied mixing instruction and density [District Rule 4607] Federally Enforceable Through Title V Permit
- 46 The permittee shall record on a daily basis, the type amount, and VOC content of each ink, coating, adhesive fountain solution, wash primer and solvent used [District Rule 4607] Federally Enforceable Through Title V Permit
- 47 The permittee shall maintain daily records of the following (1) Quantity of VOC emitted (in pounds) from this printing press, (2) Quantity of natural gas used (in cubic feet) by each drying oven and each thermal oxidizer at the facility, (3) Operational temperature of each regenerative thermal oxidizer [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
- 48 The permittee shall maintain monthly records of the quantity of natural gas used (in cubic feet) by each drying oven under this permit. These records shall be used to determine compliance with the rolling 12 consecutive month natural gas usage limit [District Rules 1070 and 2201]
- 49 The permittee shall maintain monthly records of the total VOC emissions from the entire stationary source (excluding permit unit N 1646 34). These records shall be used to determine compliance with the rolling 12 consecutive month VOC limit [District Rules 1070 and 2201]

CONDITIONS CONTINUE ON NEXT PAGE

- 50 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 1070, 4607, and 4309] Federally Enforceable Through Title V Permit
- 51 Each regenerative thermal oxidizer shall be operated at a minimum temp of 1400 deg F The regenerative thermal oxidizer shall be preheated to 1400 deg F prior to the start-up of the heatset offset printing operation Upon determining an excursion from this requirement, the permittee shall investigate the excursion and take corrective action to minimize emissions and prevent recurrence of the excursion as expeditiously as practicable [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
- 52 Each regenerative thermal incinerator shall be equipped with a continuous temperature monitoring and recording instrument [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
- 53 The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR part 64 7 [40 CFR part 64] Federally Enforceable Through Title V Permit
- 54 The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR part 64 9 [40 CFR part 64] Federally Enforceable Through Title V Permit
- 55 If the District or EPA determine that a Quality improvement plan is required under 40 CFR part 64 7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64 8 [40 CFR Part 64] Federally Enforceable Through Title V Permit



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT

Due Date

4/11/2014

Amount Due

\$ 4 467 00

Amount Enclosed

ENGTIME N1131851
1646 N102940 2/10/2014

RETURN THIS TOP PORTION ONLY, WITH REMITTANCE TO:

QG LLC
N61 W23044 HARRY'S WAY
SUSSEX WI 53089 3995

SJVAPCD
4800 Enterprise Way
Modesto CA 95356 8718

Thank You!



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT

SJVAPCD Tax ID 77 0262563

QG LLC
2201 COOPER AVE
MERCED CA 95348

Facility ID

N1646

Invoice Date

2/10/2014

Invoice Number

N102940

Invoice Type

Project N1131851

PROJECT NUMBER 1131851

ENGINEERING TIME FEES
LESS PREVIOUSLY PAID PROJECT FEES APPLIED TO THIS INVOICE
PROJECT FEES DUE (Enclosed is a detailed statement outlining the fees for each item)

\$ 4 467 00

\$ 0 00

\$ 4,467 00

Late Payment (see Rule 3010-Section 11.0 Late Fees)

Postmarked	Total Due
After 4/11/2014 through 4/21/2014	\$ 4 913 70
After 4/21/2014	\$ 6 700 50
After 5/11/2014	Permits To Operate MAY BE SUSPENDED

San Joaquin Valley Air Pollution Control District
4800 Enterprise Way Modesto, CA 95356 8718 (209) 557-6400 Fax (209) 557 6475

San Joaquin Valley Air Pollution Control District

Invoice Detail

Facility ID N1646

QG LLC
2201 COOPER AVE
MERCED CA 95348

Invoice Nbr N102940
Invoice Date 2/10/2014
Page 1

Engineering Time Fees

Project Nbr	Quantity	Rate	Description	Fee
N1131851	47.5 hours	\$ 106.00 /h	Standard Engineering Time	\$ 5,035.00
			Less Credit For Application Filing Fees	(\$ 588.00)
			Standard Engineering Time SubTotal	\$ 4,467.00
			Total Engineering Time Fees	\$ 4,467.00