



OCT 02 2014

Mr. Edward Burton
Evergreen Beverage Packaging
1500 W Main St
Turlock, CA 95380

**Re: Final - Authority to Construct / Certificate of Conformity (Significant Mod)
District Facility # N-1980
Project # N-1141880**

Dear Mr. Burton:

The Air Pollution Control Officer has issued Authorities to Construct (N-1980-7-4 and '10-0) with Certificates of Conformity to Evergreen Beverage Packaging at 1500 W Main St, Turlock, CA. The applicant proposes to install a flexographic printing operation with a drying oven served by an existing waste paperboard pick-up system. 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 August 7, 2014. The District's analysis of the proposal was also sent to CARB and US EPA Region IX on August 4, 2014. 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.

Notice of the San Joaquin Valley Air Pollution Control District's (Air District) public notification of hazardous air emissions associated with the project as mandated by section §42301.6 of the California Health and Safety Code was completed on August 7, 2014. No comments were received following the Air District's preliminary decision on this project.

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) 557-8400 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. Edward Burton
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Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Sincerely,



Arnaud Marjollet
Director of Permit Services

Enclosures

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



AUTHORITY TO CONSTRUCT

PERMIT NO: N-1980-7-4

ISSUANCE DATE: 09/30/2014

LEGAL OWNER OR OPERATOR: EVERGREEN BEVERAGE PACKAGING

MAILING ADDRESS: ATTN: EHS MANAGER
1500 W MAIN ST
TURLOCK, CA 95380

LOCATION: 1500 W MAIN ST
TURLOCK, CA 95380-0000

EQUIPMENT DESCRIPTION:

MODIFICATION OF WASTE PAPERBOARD PICK-UP SYSTEM CONSISTING OF BLOWERS/CHOPPERS, A SHREDDER/HOGGER, AND BALERS (2) SERVED BY TWO CYCLONES: CONNECT SCORING/CUTTING/TRIMMING SYSTEM LISTED IN PERMIT N-1980-10 TO PICK-UP SYSTEM


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 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] Federally Enforceable Through Title V Permit
4. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
5. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
6. 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

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO



Arnaud Manollet, Director of Permit Services
N-1980-7-4 : Sep 30 2014 10:53AM - TOMS : Joint Inspection NOT Required

7. Material removed from dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The amount of material collected by the waste paperboard pick-up system and cyclones shall not exceed 20 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
9. PM10 emissions from the waste paperboard pick-up system and cyclones shall not exceed 0.0000082 lb per lb of waste paperboard. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Permittee shall record on a daily basis the amount of waste paperboard collected in tons. [District Rule 2201] Federally Enforceable Through Title V Permit
11. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit



AUTHORITY TO CONSTRUCT

PERMIT NO: N-1980-10-0

ISSUANCE DATE: 09/30/2014

LEGAL OWNER OR OPERATOR: EVERGREEN BEVERAGE PACKAGING

MAILING ADDRESS:

ATTN: EHS MANAGER
1500 W MAIN ST
TURLOCK, CA 95380

LOCATION:

1500 W MAIN ST
TURLOCK, CA 95380-0000

EQUIPMENT DESCRIPTION:

FLEXOGRAPHIC PRINTING OPERATION CONSISTING OF A WEB-FED 4-COLOR EVERS FLEXOGRAPHIC PRINTING PRESS, A 0.6 MMBTU/HR NATURAL GAS-FIRED DRYING OVEN, AN ABHESIVE APPLICATION OPERATION, AND A SCORING/CUTTING/TRIMMING SYSTEM SERVED BY A PAPER WASTEBOARD PICK-UP SYSTEM LISTED IN PERMIT N-1980-7

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. Prior to operating equipment under this Authority to Construct, permittee shall surrender VOC emission reduction credits for the following quantities of emissions: 1st quarter - 5,955 lb, 2nd quarter - 5,955 lb, 3rd quarter - 5,955 lb, and fourth quarter - 5,955 lb. Offsets shall be provided at the applicable offset ratio specified in Table 4-2 of Rule 2201 (as amended 12/19/02). [District Rule 2201] Federally Enforceable Through Title V Permit
4. ERC Certificate Numbers S-3779-1, S-4172-1, S-4252-1, S-4338-1, S-4288-1 (or a certificate split from this certificate) shall be used to supply the required offsets, unless a revised offsetting proposal is received and approved by the District, upon which this Authority to Construct shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of this Authority to Construct [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO


Arnaud Marjollet, Director of Permit Services
N-1980-10-0: Issued 10/30/2014 10:53AM - TOMS : Joint Inspection NOT Required

5. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
6. 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 I or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
7. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
8. The drying oven shall only be fired on PUC-regulated natural gas. [District Rules 2201 and 4801] Federally Enforceable Through Title V Permit
9. Drying oven emission factors shall not exceed any of the following limits: 0.1 lb-NOx/MMBtu, 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 0.084 lb-CO/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
10. VOC content of the following materials shall not exceed any of the following limits: adhesive materials: 2.40 lb/gal excluding water and exempt compounds; ink and ink additive materials: 2.40 lb/gal excluding water and exempt compounds; cleaning solvent materials for specialty flexographic printing ink application equipment: 0.83 lb/gal. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Ammonia Hydroxide (NH₄OH) content of the following materials shall not exceed any of the following limits: adhesive materials: 4.0 lb/100 lb adhesive; ink additive: 13.0 lb/100 lb ink additive. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Usage of the following materials shall not exceed any of the following limits: adhesive materials: 4.62 gallons per day, ink and ink additive materials: 32.85 gallons per day; cleaning solvent materials for specialty flexographic printing ink application equipment: 1.92 gallons per day. [District Rule 2201] Federally Enforceable Through Title V Permit
13. For flexographic printing operations, VOC content of graphic arts materials, less water and less exempt compounds, as applied, shall not exceed any of the following limits: flexographic ink on porous substrates: 225 g/l (1.88 lb/gal); all other inks: 300 g/l (2.5 lb/gal); coating: 300 g/l (2.5 lb/gal); adhesive: 150 g/l (1.25 lb/gal); web splicing adhesive: 150 g/l (1.25 lb/gal). [District Rules 2520 and 4607] Federally Enforceable Through Title V Permit
14. For flexographic printing operations, VOC content of specialty ink, less water and less exempt compounds, as applied, shall not exceed any of the following limits: metallic ink: 300 g/l (2.5 lb/gal); matte finish ink: 300 g/l (2.5 lb/gal); metallic ink and matte finish ink on flexible package printing: 300 g/l (2.5 lb/gal). In addition, the specialty inks used shall not exceed two gallons in a calendar day and 120 gallons in a calendar year. [District Rules 2520 and 4607] Federally Enforceable Through Title V Permit
15. Only flow coater, roll coater, dip coater, foam coater, die coater, hand application methods shall be used to apply coatings. HVLP spray equipment may be used for air dried coatings only. Application equipment shall be operated in accordance with the manufacturer's specifications. [District Rule 4607] Federally Enforceable Through Title V Permit
16. Cleaning activities that use solvents with a VOC content greater than 25 g/l (0.21 lb/gallon) shall be performed by one or more of the following methods: (1) wipe cleaning; 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 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. [District Rule 4607] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

18. For a permittee using any solvent containing more than 25 g/L of VOC for organic solvent cleaning, the permittee shall not use VOC-containing materials 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 component part(s) being cleaned 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
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. 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. The permittee shall properly use and properly 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. Permittee shall maintain a current file of inks, adhesives, 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, less water and exempt compounds (or sufficient composition data to calculate this value), material VOC content (or VOC content "as packaged" from manufacturer), mixing instructions, and density. [District Rules 2201 and 4607] Federally Enforceable Through Title V Permit
22. For each ink and solvent material used in this operation, the permittee shall record on a daily basis the product/material name, material type (e.g. ink), amount used (gallons), VOC content, less water and exempt compounds as applied (lb-VOC/gal), material VOC content as applied (lb-VOC/gal). [District Rules 2201 and 4607] Federally Enforceable Through Title V Permit
23. Permittee shall record on a daily basis, the type and amount of each specialty ink used at the facility, as defined in Rule 4607. [District Rules 1070 and 4607] Federally Enforceable Through Title V Permit
24. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070, 2520, and 4607] Federally Enforceable Through Title V Permit