San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

APR 2 6 2016

Mr. Mac McCullough
Pacific Southwest Container
4530 Leckron Road
Modesto, CA 95357

Re: Proposed ATC / Certificate of Conformity (Significant Mod)
District Facility # N-3606
Project # N-1160509

Dear Mr. McCullough:

Enclosed for your review is the District's analysis of an application for Authority to Construct for the facility identified above. You requested that a Certificate of Conformity with the procedural requirements of 40 CFR Part 70 be issued with this project. This project is to install a new lithographic printing press, and keep the facility-wide VOC emissions unchanged.

After addressing all comments made during the 30-day public notice and the 45-day EPA comment periods, the District intends to issue the Authority to Construct with a Certificate of Conformity. Please submit your comments within the 30-day public comment period, as specified in the enclosed public notice. Prior to operating with modifications authorized by the Authority to Construct, the facility must submit an application to modify the Title V permit as an administrative amendment, in accordance with District Rule 2520, Section 11.5.

If you have any questions, please contact Mr. Nick Peirce, Permit Services Manager, at (209) 557-6400.

Thank you for your cooperation in this matter.

Sincerely,

Arnaud Marjollet
Director of Permit Services

Enclosures

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

Seyed Sadredin
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San Joaquin Valley Air Pollution Control District
Authority to Construct

A new Offset Lithographic Printing Operation

Facility Name:	Pacific Southwest Container	Date:	April 18, 2016
Mailing Address:	4530 Leckron Road	Engineer:	Wai-Man So
	Modesto, CA 95357	Lead Engineer:	Nick Peirce
Contact Person:	Mac McCullough (Sr. VP Quality & Environmental Management)		
Telephone:	(209) 557 – 5270	E-mail:	macm@teampsc.com
Fax:	(209) 522 – 2913		
Application #(s):	N-3606-33-0		
Project #:	N-1160509		
Deemed Complete:	March 16, 2016		

I. PROPOSAL

Pacific Southwest Container (hereinafter PSC) is requesting an Authority to Construct (ATC) to install a new printing press and keep the facility-wide SLC of 73,403 pounds of VOC per year unchanged.

PSC possesses a Title V permit. The proposed project is a Signification Modification to the Title V permit, as this project is a Federal Major Modification under District Rule 2201. The applicant has requested to issue the ATC with a Certificate of Conformity (COC), which is EPA's 45-day review of the project prior to the issuance of the final ATC. This project will be published in the local newspaper, Modesto Bee, for public review and comment. The public comment period will last 30-days from the date of publication. Both COC and public notice will run concurrently.

II. APPLICABLE RULES

District Rule 2201	New and Modified Stationary Source Review Rule (02/18/16)
District Rule 2410	Prevention of Significant Deterioration (effective 11/26/12)
District Rule 2520	Federally Mandated Operating Permits (06/21/01)
District Rule 4001	New Source Performance Standards (04/14/99)
District Rule 4002	National Emission Standards for Hazardous Air Pollutants (05/20/04)
District Rule 4101	Visible Emissions (02/17/05)
District Rule 4102	Nuisance (12/17/92)
District Rule 4607	Graphic Arts and Paper, Film, Foil and Fabric Coatings (12/18/08)
District Rule 4663	Organic Solvent Cleaning, Storage, and Disposal (09/20/07)
CH&SC 41700	Health Risk Assessment
CH&SC 42301.6	School Notice

Public Resources Code 21000-21177: California Environmental Quality Act (CEQA)

California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387: CEQA Guidelines

III. PROJECT LOCATION

This facility is located at 4530 Leckron Road, Modesto in California. The equipment will not be located within 1,000 feet of the outer boundary of any K-12 school. Therefore, the public notification requirement of California Health and Safety Code 42301.6 is not applicable to this project.

IV. PROCESS DESCRIPTION

The proposed new printing press is a 8-color non-heatset offset lithographic sheet-fed printing press equipped with LED UV curing system. Sheet-fed offset lithographic printing utilizes a rotary press to print an image on a sheet of paper. The proposed press utilizes several printing units. Each printing unit has a series of vertically arranged rollers and cylinders above and below the sheet of paper. Rollers transfer the fountain solution and ink to the plate cylinder. The image is then transferred from the plate to a rubber covered blanket cylinder and then to the sheet of paper. Typically, each printing unit simultaneously applies a single color to both sides of the web. Together all printing units can overlay colors for a full color image without heated drying between printing units. The proposed new printing press is equipped with an electrical heater. The function of the electrical heater is to pre-heat the paper to enhance the printing process and is not for inks drying.

V. EQUIPMENT LISTING

GRAPHIC ARTS PRINTING OPERATION CONSISTING OF A HEIDELBERG MODEL XL162-8+LEOP OFFSET LITHOGRAPHIC PRINTING PRESS WITH AN AMS MODEL XP-9 UV LED CURING SYSTEM

VI. EMISSION CONTROL TECHNOLOGY EVALUATION

Volatile Organic Compounds (VOC) is emitted from the printing process. PSC is proposing to operate the printing operation with inks/coatings, fountain solutions, and solvents that comply with the VOC content limits specified in District Rule 4607, Graphic Arts and Paper, Film, Foil and Fabric Coatings (amended 12/18/08). The amount of VOC emitted from the new press is limited by utilize the low VOC content materials.

VII. GENERAL CALCULATIONS

A. Assumptions

- Assumption will be stated as each is made.

B. Emission Factors

Pre-Project Emission Factors (EF1)

This is a new emissions unit. PE1 is equal to zero for each criteria pollutant.

Post-Project Emission Factors (EF2)

The VOC emissions from this operation will be determined based on the VOC content of the materials and their respective usages; and therefore, a separate emission factor will not be listed on the permit.

C. Potential to Emit (PE) Calculations

1. Daily and Annual PE

Pre-Project Potential to Emit (PE1)

This is a new permit unit. PE1 is equal to zero.

Post-Project Potential to Emit (PE2)

The applicant proposed the daily and annual VOC emissions of 130 lb-VOC/day and 39,000 lb-VOC/year, respectively for this permit unit. The post-project potential to emit is summarized in the following table:

Pollutant	Daily PE2 (lb/day)	Annual PE2 (lb/year)
VOC	130	39,000

In addition, the facility currently has a SLC of 73,403 lb-VOC/year for the entire facility, and the applicant is not proposing any changes to this limit.

2. Quarterly Net Emissions Change

The Quarterly Net Emissions Changes (QNEC) is calculated for each pollutant, for each unit, as the difference between the quarterly PE2 and the quarterly baseline emissions (BE). The annual emissions are evenly distributed throughout each quarter using the following equation:

QNEC (lb/quarter) = [Annual PE2 – Annual PE1] (lb/year) / 4 (quarter/year)

No changes to the SLC of VOC for the entire facility are proposed. Therefore, QNEC is equal to zero for each quarter for this permit unit.

3. Adjusted increase in Permitted Emissions (AIPE)

AIPE is used to determine if Best Available Control Technology (BACT) is required for emission units that are being modified.

This is a new emission unit. AIPE calculations are not required.

D. Facility Emissions

1. Pre-Project Stationary Source Potential to Emit (SSPE1)

Pursuant to District Rule 2201, the SSPE1 is the Potential to Emit (PE) from all units with valid Authorities to Construct (ATC) or Permits to Operate (PTO) at the Stationary Source and the quantity of Emission Reduction Credits (ERC) which have been banked since September 19, 1991 for Actual Emissions Reductions (AER) that have occurred at the source, and which have not been used on-site.

SSPE1 values are taken from engineering evaluation under project N-1152765.

Permit Number	Pollutants (lb/yr)				
	NO_X	SO_X	PM_{10}	CO	VOC
N-3606-3-7	0	0	0	0	
N-3606-4-6	0	0	183	0	
N-3606-11-9	0	0	0	0	
N-3606-13-7	0	0	0	0	
N-3606-14-7	0	0	0	0	
N-3606-15-7	0	0	0	0	
N-3606-16-7	0	0	0	0	
N-3606-19-5	0	0	0	0	
N-3606-21-5	0	0	0	0	
N-3606-23-6	0	0	0	0	73,403
N-3606-24-5	0	0	0	0	
N-3606-25-3	0	0	0	0	
N-3606-26-6	0	0	0	0	
N-3606-27-4	0	0	0	0	
N-3606-29-1	0	0	0	0	
N-3606-30-1	1,430	509	1,358	6,612	
N-3606-31-2	0	0	0	0	
N-3606-32-1	0	0	0	0	
ERC	0	0	0	0	0
SSPE1	1,430	509	1,541	6,612	73,403

2. Post-Project Stationary Source Potential to Emit (SSPE2)

Pursuant to District Rule 2201, the SSPE2 is the PE from all units with valid ATCs or PTOs at the Stationary Source and the quantity of ERCs which have been banked since September 19, 1991 for AER that have occurred at the source, and which have not been used on-site.

Permit Number	Pollutants (lb/yr)				
	NO_X	SO_X	PM_{10}	CO	VOC
N-3606-3-7	0	0	0	0	
N-3606-4-6	0	0	183	0	
N-3606-11-9	0	0	0	0	
N-3606-13-7	0	0	0	0	
N-3606-14-7	0	0	0	0	
N-3606-15-7	0	0	0	0	
N-3606-16-7	0	0	0	0	
N-3606-19-5	0	0	0	0	
N-3606-21-5	0	0	0	0	
N-3606-23-6	0	0	0	0	73,403
N-3606-24-5	0	0	0	0	
N-3606-25-3	0	0	0	0	
N-3606-26-6	0	0	0	0	
N-3606-27-4	0	0	0	0	
N-3606-29-1	0	0	0	0	
N-3606-30-1	1,430	509	1,358	6,612	
N-3606-31-2	0	0	0	0	
N-3606-32-1	0	0	0	0	
ATC N-3606-33-0	***0***	***0***	***0***	***0***	
ERC	0	0	0	0	0
SSPE2	1,430	509	1,541	6,612	73,403

3. Stationary Source Increase in Permitted Emissions (SSIPE)

SSIPE calculations are used to determine if the project triggers public notice pursuant to District Rule 2201. If SSIPE results greater than 20,000 lb/yr for any one pollutant then project requires public notification. At this time, it is District Practice to define the SSIPE as the difference of SSPE2 to SSPE1, and calculated by the following equation:

SSIPE (lb/yr) = SSPE2 (lb/yr) – SSPE1 (lb/yr)

SSIPE	Pollutants (lb/yr)				
	NO_X	SO_X	PM_{10}	CO	VOC
SSPE2	1,430	509	1,541	6,612	73,403
SSPE1	1,430	509	1,541	6,612	73,403
SSIPE	0	0	0	0	0

As shown above, SSIPE is equal to zero for each pollutant.

4. Major Source Determination

Rule 2201 Major Source Determination:

Pursuant to District Rule 2201, a Major Source is a stationary source with a SSPE2 equal to or exceeding one or more of the following threshold values. For the purposes of determining major source status the following shall not be included:

- any ERCs associated with the stationary source
- emissions from non-road IC engines (i.e. IC engines at a particular site at this facility for less than 12 months)
- Fugitive emissions, except for the specific source categories specified in 40 CFR 51.165

There are no ERCs listed for this facility.

Rule 2201 Major Source Determination (lb/year)						
	NO_X	SO_X	PM10	PM2.5	CO	VOC
SSPE1	1,430	509	1,541	1,541	6,612	73,403
SSPE2	1,430	509	1,541	1,541	6,612	73,403
Major Source Threshold	20,000	140,000	140,000	200,000	200,000	20,000
Major Source	No	No	No	No	No	Yes

Note: PM2.5 assumed to be equal to PM10

As seen above, this facility is an existing Major Source for VOC emissions and will remain a Major Source for VOC. No change in other pollutants are proposed or expected as a result of this project

Rule 2410 Major Source Determination:

The facility or equipment evaluated under this project is not listed as one of the categories specified in 40 CFR 52.21(b)(1)(iii). Therefore, the PSD Major Source threshold is 250 tpy for any regulated NSR pollutant.

PSD Major Source Determination (tons/year)						
	NO2	VOC	SO2	CO	PM	PM10
Estimated Facility PE before Project Increase	0.7	36.7	0.3	3.3	0.8	0.8
PSD Major Source Thresholds	250	250	250	250	250	250
Existing PSD Major Source ? (Y/N)	N	N	N	N	N	N

As shown above, the facility is not an existing PSD Major Source for any regulated NSR pollutant expected to be emitted at this facility

5. Baseline Emissions (BE)

The BE calculation (in lb/year) is performed pollutant-by-pollutant for each unit within the project to calculate the QNEC, and if applicable, to determine the amount of offsets required:

Pursuant to District Rule 2201, BE = PE1 for:

- Any unit located at a non-Major Source,
- Any Highly-Utilized Emissions Unit, located at a Major Source,
- Any Fully-Offset Emissions Unit, located at a Major Source, or
- Any Clean Emissions Unit, Located at a Major Source.

Otherwise,
BE = Historic Actual Emissions (HAE), calculated pursuant to District Rule 2201

The following table shows the applicable BACT guideline number, the Achieved-in-Practice BACT requirement and whether or not the unit is a Clean Emission Unit (Achieved-in-Practice BACT was met).

Permit	Description	BACT Guideline	Achieved-in-Practice BACT Requirement	Permit Limit	Clean Emission Unit
N-3306-3-7	Corrugated Box/Board Manufacturing	4.9.12	Adhesive with 0.44 lb VOC/gal or less	VOC = 0.021 lb/gal	Yes
N-3306-11-9				VOC = 0.021 lb/gal	Yes
N-3306-19-5				VOC = 0.021 lb/gal	Yes
N-3306-21-5				VOC = 0.021 lb/gal	Yes
N-3306-25-3				VOC = 0.021 lb/gal	Yes
N-3306-27-4				VOC = 0.021 lb/gal	Yes
N-3306-31-2				VOC = 0.015 lb/gal	Yes
N-3306-4-6	Corrugated Board Manufacturing	4.9.12	Adhesive with 0.44 lb VOC/gal or less	VOC = 0.021 lb/gal	Yes
	And Corrugated Board Laminating	4.11.3	Adhesive with 0.021 lb VOC/gal or less	VOC = 0.021 lb/gal	
N-3306-13-7	Flexographic Printer (low-end graphics)	4.7.15	Ink with 0.3 lb VOC/gal or less	VOC = 0.3 lb/gal	Yes
N-3306-14-7					Yes
N-3306-15-7	And Gluer	4.9.12	Adhesive with 0.44 lb VOC/gal or less	VOC = 0.021 lb/gal	Yes

Permit	Description	BACT Guideline	Achieved-in-Practice BACT Requirement	Permit Limit	Clean Emission Unit
N-3306-16-7 N-3306-23-6 N-3306-26-6 N-3306-32-1	Offset lithographic printing operations	4.7.2	Inks: <5% by wt. or 30% by weight for high end graphics Fountain Solution: <5% by vol. for coldest offset lithographic and sheet-fed lithographic greater than 11 x 17 inches Or 8% by volume for high end graphics	Inks with < 5% VOC by wt. Fountain solutions with < 5% VOC by vol. for high-end graphics and < 5% by vol. for non-high-end graphics	Yes Yes Yes Yes
N-3306-24-5	Offset lithographic printing operation	4.7.2	Inks: <5% by wt. or 30% by weight for high end graphics Fountain Solution: <5% by vol. for coldest offset lithographic and sheet-fed lithographic greater than 11 x 17 inches Or 8% by volume for high end graphics	Inks with < 5% VOC by wt. < 6% by volume for high-end graphics and <5% by volume for non-high-end graphics	Yes
N-3306-29-1	N/A. This unit does not emit VOC.				
N-3306-30-1	Boiler	--	Use of natural gas with LPG or propane as backup fuel	Requires the use of natural gas	Yes

6. SB 288 Major Modification

SB 288 Major Modification is defined in 40 CFR Part 51.165 as "any physical change in or change in the method of operation of a major stationary source that would result in a significant net emissions increase of any pollutant subject to regulation under the Act."

As shown in Section VII.D.4 of this document, this facility is an existing Major Source for VOC emissions. Therefore, the project's PE2 is compared to the SB 288 Major Modification Thresholds in order to determine if the SB 288 Major Modification calculation is required.

As shown in Section VII.C.1 of this document, the PE2 for this project itself is equal to 39,000 pounds of VOC per year.

SB 288 Major Modification Thresholds (Existing Major Source)			
Pollutant	Project's PE (lb/year)	Thresholds (lb/year)	SB 288 Major Modification Calculation Required?
VOC	39,000	50,000	No

As indicate above, the SB 288 Major Modification Threshold for VOC is not surpassed with this project, this project does not constitute an SB 288 Major Modification and further analysis is required.

7. Federal Major Modification

District Rule 2201 states that a Federal Major Modification is the same as a "Major Modification" as defined in 40 CFR 51.165 and part D of Title I of the CAA.

The determination of Federal Major Modification is based on a two-step test. For the first step, only the emission *increases* are counted. Emission decreases may not cancel out the increases for this determination.

For new emissions units, the increase in emissions is equal to the PE2 for each new unit included in this project.

As shown in Section VII.C.1 of this document, the PE2 for the new printing press is 39,000 pounds per year, and is compared to the Federal Major Modification Thresholds in the following table.

Federal Major Modification Thresholds for Emissions Increases			
Pollutant	Total Emissions Increase (lb/yr)	Thresholds (lb/yr)	Federal Major Modification?
NOx	0	0	No
VOC	39,000	0	Yes
PM10	0	30,000	No
PM2.5	0	20,000	No
SOx	0	80,000	No

Since there is an increase of VOC emissions, this project constitutes a Federal Major Modification. Federal Offset quantities are calculated below.

Federal Offset Quantity Calculations

As discussed above, the proposed project triggers Federal Major Modification for VOC emission, and the Federal Offset Ratio for VOC is 1.5. Federal Offset quantities for this project are calculated as follows:

Federal Offset Quantity Calculations			
Permit	Actual Emissions (lb/yr)	Potential Emissions (lb/yr)	Emissions Change (lb/yr)
N-3606-33	0	39,000	39,000
		Net Emission Change (lb/yr):	39,000
		Federal Offset Quantity:(NEC * 1.5)	58,500

8. Rule 2410 – Prevention of Significant Deterioration (PSD) Applicability Determination

Rule 2410 applies to any pollutant regulated under the Clean Air Act, except those for which the District has been classified nonattainment. The pollutants which must be addressed in the PSD applicability determination for sources located in the SJV are: (See 52.21 (b) (23) definition of significant).

As determined in Section VII.D.4 of this document, this facility is not an existing PSD Major Source. Therefore, the project potential to emit from the new and modified units is compared to the PSD major source thresholds to determine if the project is subject to the requirements of Rule 2410.

The equipment associated with this project emits only VOC, and as shown in Section VII.C.1 of this document, the potential emission from the new unit is 39,000 lb-VOC/year (equivalent to 19.5 ton-VOC/year).

The facility or the equipment evaluated under this project is not listed as one of the categories specified in 40 CFR 52.21 (b)(1)(iii). The PSD Major Source threshold is 250 tpy for any regulated NSR pollutant.

PSD Major Source Determination: Potential to Emit (tons/year)						
	NO2	VOC	SO2	CO	PM	PM10
Total PE from the modifed unit	0	19.5	0	0	0	0
PSD Major Source Thresholds	250	250	250	250	250	250
New PSD Major Source ? (Y/N)	N	N	N	N	N	N

As shown in the table above, the project potential to emit for the project, by itself, does not exceed any PSD Major Source thresholds. Therefore Rule 2410 is not applicable and no further discussion is required.

VIII.COMPLIANCE

District Rule 2201 New and Modified Stationary Source Review Rule

1. Best Available Control Technology (BACT)

A. BACT Applicability

BACT requirements are triggered on a pollutant-by-pollutant basis and on an emissions unit-by-emissions unit basis for the following*:

a) Any new emissions unit with a potential to emit exceeding two pounds per day,
b) The relocation from one Stationary Source to another of an existing emissions unit with a potential to emit exceeding two pounds per day,
c) Modifications to an existing emissions unit with a valid Permit to Operate resulting in an AIPE exceeding two pounds per day, and/or
d) Any new or modified emissions unit, in a stationary source project, which results in a Major Modification.

*Except for CO emissions from a new or modified emissions unit at a Stationary Source with an SSPE2 of less than 200,000 pounds per year of CO.

As discussed in Section I of this document, the facility is proposing to install a new printing press. Additionally, as determined in Section VII.D.7 of this document, this project constitutes a Federal Major Modification. Therefore, BACT is triggered and required for the new press.

B. BACT Guideline

BACT Guideline 4.7.2, which appears in Appendix III of this document, covers offset lithographic printing with non-heat set press.

C. Top Down BACT Analysis

Per District Policy APR 1305, Section IX, "A top-down BACT analysis shall be performed as a part of the Application Review for each application subject to the BACT requirements pursuant to the District's NSR Rule for source categories or classes covered in the BACT Clearinghouse, relevant information under each of the following steps may be simply cited from the Clearinghouse without further analysis."

The "Top-Down BACT Analysis" for VOC emissions is performed in Appendix III of this document. According to this analysis, BACT is satisfied with:

VOC: Using materials with the following VOC contents:

- Inks: less than 5% VOC by weight (less water and exempt compounds) or less than 30% VOC by weight (less water and exempt compounds) for high end graphics

- Fountain Solutions: less than 5% by volume for coldest web offset lithographic, less than 5% by volume for sheet-fed offset lithographic with maximum sheet size greater than 11 x 17 inches, and less than 8% by volume for high end graphics

The proposed operation meets the above requirements. Therefore, BACT is satisfied for VOC emissions.

2. Offsets

Offset requirements shall be triggered on a pollutant by pollutant basis and shall be required if the SSPE2 equals to or exceeds the offset threshold levels in Table 4-1 of Rule 2201.

The SSPE2 is compared to the offset thresholds in the following table.

Offset Determination (lb/year)					
	NO_X	SO_X	PM_{10}	CO	VOC
SSPE2	1,430	509	1,541	6,612	73,403
Offset Threshold	20,000	54,750	29,200	200,000	20,000
Offset Triggered?	No	No	No	No	Yes

As discussed in previous section the facility is an existing Major Source for VOC, and as shown above table the SSPE2 is greater than the offset threshold. Therefore offset calculations will be required for this project.

The quantity of offsets in pounds per year for VOC is calculated as follows for sources with an SSPE1 greater than the offset threshold levels before implementing the project being evaluated.

Offsets Required (lb/year) = (Σ[PE2 – BE] + ICCE) x DOR, for all new or modified emissions units in the project,

Where,
PE2 = Post Project Potential to Emit, (lb/year)
BE = Baseline Emissions, (lb/year)
ICCE= Increase in Cargo Carrier Emissions, (lb/year)
DOR= Distance Offset Ratio, determined pursuant to Section 4.8

BE = PE1 for:

- Any unit located at a non-Major Source,
- Any Highly-Utilized Emissions Unit, located at a Major Source,
- Any Fully-Offset Emissions Unit, located at a Major Source, or
- Any Clean Emissions Unit, Located at a Major Source.

Otherwise,
BE = HAE

The BE for the new press is equal to zero. PSC will not have a dedicated cargo carrier equipment, defined in section 3.12 of Rule 2201 on site, and therefore, no increases in Cargo Carrier emissions as a result of this project, and the proposed new emission unit will be located in the same stationary source, which result DOR = 1.0. Then,

Emission offset = Σ (PE2 – 0) x 1.0 + 0 = Σ (PE2)

Pursuant to District Policy APR 1420, *NSR Calculations for Units with Specific Limiting Conditions (3/12/07)*, the quantity of ERCs for a project will be determined by comparing the post project PE, which is the SLC, to the pre project BE, the existing SLC.

Additionally, the policy states that if the SLC is for a pollutant exceeding the Major Source threshold and any single unit under the SLC is not a Highly-Utilized, Fully-Offset, or Clean Emissions Units, then the sum of the actual emissions from all units in SLC will be used to determine the pre project BE.

As shown in Section VII.D.5 of this document, all permit units at this facility meet the District's determination of achieved-in-practice BACT (and are thus Clean Emission Units). Therefore the pre project BE emissions are equal to the pre project PE emissions ($BE_{SLC} = PE1_{SLC}$).

Based on the information above, the emissions increase to be offset for this project should be calculated as follows:

Emissions Increase (lb/year) = $PE2_{SLC} - BE_{SLC}$

Where:

$PE2_{SLC}$ = Post project SLC selected by the facility. In this project, $PE2_{SLC} = PE1_{SLC}$.
$BE_{SLC} = PE1_{SLC}$ = 73,403 lb-VOC/yr

Therefore,
Emissions Increase (lb/year) = $PE2_{SLC} - BE_{SLC}$
= 73,403 lb-VOC/yr – 73,403 lb-VOC/yr
= 0 lb-VOC/yr

As indicated above, offsets are not required for this project.

3. Public Notification

District Rule 2201 requires a public notification for the affected pollutants from the following types of projects:

a. New Major Source, Federal Major Modification, and SB 288 Major Modification

As demonstrated in Section VII.D.7, this project constitutes Federal Major Modification. Therefore, public noticing for Federal Major Modification purpose is required.

b. Any new emission unit with PE > 100 lb/day for any one pollutant

The PE2 for the new unit is compared to the daily PE Public Notice thresholds in the following table:

PE> 100 lb/day Public Notice Thresholds			
Pollutant	PE2 (lb/day)	Public Notice Threshold	Public Notice Triggered?
NO_X	0.0	100 lb/day	No
SO_X	0.0	100 lb/day	No
PM_{10}	0.0	100 lb/day	No
CO	0.0	100 lb/day	No
VOC	130.0	100 lb/day	Yes

As seen above, public noticing for PE > 100 lb/day for VOC emission is required.

c. Modifications with SSPE1 below an Offset threshold and SSPE2 above an Offset threshold on a pollutant-by-pollutant basis

The proposed project does not result in SSPE from below offset threshold level to above offset threshold level for any one pollutant. Therefore, public noticing for this purpose is not required.

d. Any project with an SSIPE of greater than 20,000 lb/year for any pollutant

As seen in Section VII.C.3 of this document, the SSIPE for each pollutant is equal to zero; therefore, public noticing for SSIPE purpose is not required.

e. Title V Significant Permit Modification

As shown in the Discussion of Rule 2520 below, this project constitutes a Title V significant modification. Therefore, public noticing for Title V significant modifications is required for this project.

As discussed above, public notice is required for this project for triggering Federal Major Modification. Therefore, public notice documents will be submitted to the California Air Resources Board (CARB) and US Environmental Protection Agency (US EPA) and a public notice will be published in a local newspaper of general circulation prior to the issuance of the ATC for the equipment.

4. Daily Emission Limits (DELs)

DELs and other enforceable conditions are required by Rule 2201 to restrict a unit's maximum daily emissions, to a level at or below the emissions associated with the maximum design capacity. The DEL must be contained in the latest ATC and contained in or enforced by the latest PTO and enforceable, in a practicable manner, on a daily basis. DELs are also required to enforce the applicability of BACT. Therefore, the following conditions will be listed on the permit:

- *VOC emissions from this unit shall not exceed 130.0 pounds in any one day. [District Rule 2201]*
- *VOC emissions from this unit shall not exceed 39,000 pounds on a rolling 12-month basis. [District Rule 2201]*
- *Facility-wide VOC emissions shall not exceed 73,403 pounds on a rolling 12-month basis. [District Rule 2201]*
- *VOC content of the materials shall not exceed any of the following limits: inks - less than 5% VOC by weight (less water and exempt compounds), or 2.5 lb/gallon (less water and exempt compounds, as applied); coatings - 2.5 lb/gallon (less water and exempt compounds, as applied); inks for high end graphics - less than 30% VOC by weight (less water and exempt compounds), or 2.5 lb/gallon (less water and exempt compounds, as applied); fountain solutions - less than 5.0% VOC by volume. [District Rules 2201 and 4607]*

5. Compliance Assurance

a. Source Testing

Pursuant to District Policy APR 1705, source testing is not required to demonstrate compliance with Rule 2201.

b. Monitoring

No monitoring is required to demonstrate compliance with Rule 2201.

c. Recordkeeping

Recordkeeping is required to demonstrate compliance with the offset, public notification, and daily emission limit requirements of Rule 2201. The permittee is required to keep the daily and cumulative annual VOC emissions due to the ink usages. In addition, as required by District Rule 4607, *Graphic Arts*, this printing press is subject to recordkeeping requirements. Recordkeeping requirements, in accordance with District Rule 4607, will be discussed in Section VIII, *District Rule 4607*, of this document.

d. Reporting

No reporting is required to ensure compliance with Rule 2201.

6. Ambient Air Quality Analysis

Per Section 4.14 of Rule 2201, ambient air quality analysis (AAQA) shall be conducted for the purpose of determining whether a new or modified Stationary Source will cause or make worse the violation of an Ambient Air Quality Standard (AAQS).

This project involves only VOCs for which AAQS does not exist; therefore, AAQA is not performed for this project.

7. Compliance Certification

Section 4.15.2 of this rule requires the owner of a new Major Source or a source undergoing a Federal Major Modification to demonstrate to the satisfaction of the District that all other Major Sources owned by such person and operating in California are in compliance or are on a schedule for compliance with all applicable emission limitations and standards.

As discussed in Section VII.D.7 of this document, this project constitutes a Federal Major Modification. Therefore, compliance certification is required, and a copy of compliance certification from the facility is included in Appendix III of this document.

8. Alternative Siting Analysis

The current project occurs at an existing facility. The applicant proposes to install a new printing press.

Since the current project involves only install a new printing press and no change to any other facets of the operation, the existing site will result in the least possible impact from the project. Alternative sites would involve the relocation and/or construction of various support structures and facilities on a much greater scale, and would therefore result in a much greater impact.

Compliance with the requirements of this Rule is expected.

District Rule 2410 Prevention of Significant Deterioration

The provisions of this rule shall apply to any source and the owner or operator of any source subject to any requirements under Title 40 Code of Federal Regulations (40 CFR) Part 52.21 as incorporated into this rule.

As demonstrated in Section VII.D.8 of this document, the proposed project is not subject to the requirements of Rule 2410; therefore no further discussion is required.

District Rule 2520 Federally Mandated Operating Permits

PSC is a Major Source for VOC emissions, and is operating under Title V permit. Therefore, this facility is subjected to the requirements of this rule.

As discussed in Section VII.D.7 of this document, the proposed project triggers Federal Major Modification and therefore, is a Significant Modification to their Title V operating permit. The applicant has applied for a Certificated of Conformity (COC). Therefore, the following conditions will be listed on the permit:

- *{1830} 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 NSR Rule]*

- *{1831} 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]*

In accordance with Rule 2520, the application meets the procedural requirements of Section 11.4 by including:

- A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs and
- The source's suggested draft permit (Appendix I of this document) and
- Certification by a responsible official that the proposed modification meets the criteria for use of major permit modification procedures and a request that such procedures be used (Appendix IV of this document)

Section 5.3.4 of this rule requires the permittee shall file an application for administrative permit amendments prior to implementing the requested change. PSC is expected to notify the District by filing an administrative amendment application upon implementing the ATC.

Therefore, compliance with the requirements of this Rule is expected.

District Rule 4001 New Source Performance Standards – *40 CFR Part 60, Subpart QQ – Standards of Performance for the Graphic Arts Industry: Publication Rotogravure printing*

This rule incorporates NSPS from Part 60, Chapter 1, Title 40, Code of Federal Regulations (CFR); and applies to all new sources of air pollution and modifications of existing sources of air pollution listed in 40 CFR Part 60.

Pursuant to §60.430(c), this subpart applies to each rotogravure printing press that commences construction, modification, or reconstruction after October 28, 1980.

The proposed new unit, the offset lithographic printing press, is not a rotogravure press; and therefore, this subpart does not apply and no further discussion is required.

District Rule 4002 National Emission Standards for Hazardous Air Pollutants – *40 CFR Part 63, Subpart KK – National Emission Standards for the Printing and Publishing Industry*

This rule incorporates NESHAPs from Part 61, Chapter I, Subchapter C, Title 40, CFR and the NESHAPs from Part 63, Chapter I, Subchapter C, Title 40, CFR; and applies to all sources of hazardous air pollution listed in 40 CFR Part 61 or 40 CFR Part 63.

Pursuant to §63.820(a)(1), this subpart applies to each new and existing facility that is a major source of hazardous air pollutants (HAP), as defined in 40 CFR 63.2, at which publication rotogravure, product and packing rotogravure, or wide-web flexographic printing presses are operated.

The proposed new unit, the offset lithographic printing press, is not a publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing press; and therefore, this subpart does not apply and no further discussion is required.

District Rule 4101 Visible Emissions

District Rule 4101, Section 5.0, indicates that 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 dark or darker than Ringlemann 1 or equivalent to 20% opacity. To ensure continuous compliance with the requirement of this Rule, the following condition will be listed on the permit:

- *{15} 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]*

District Rule 4102 Nuisance

Section 4.0 prohibits discharge of air contaminants, which could cause injury, detriment, nuisance or annoyance to the public. Public nuisance conditions are not expected as a result of these operations, provided the equipment is well maintained. To ensure compliance with the requirement of this Rule, the following condition will be listed on the permit:

- *{98} No air contaminant shall be released into the atmosphere, which causes a public nuisance. [District Rule 4102]*

California Health & Safety Code 41700 (Health Risk Assessment)

District Policy APR 1905 – *Risk Management Policy for Permitting New and Modified Sources* specifies that for an increase in emissions associated with a proposed new source or modification, the District perform an analysis to determine the possible impact to the nearest resident or worksite.

An HRA is not required for a project with a total facility prioritization score of less than one. According to the Technical Services Memo for this project (Appendix IV), the total facility prioritization score including this project was greater than one. Therefore, an HRA was required to determine the short-term acute and long-term chronic exposure from this project.

The cancer risk for this project is shown below:

HRA Summary		
Unit	Cancer Risk	T-BACT Required
N-3606-33-0	N/A	No

BACT for toxic emission control (T-BACT) is required if the cancer risk exceeds one in one million. As demonstrated above, T-BACT is not required for this project because the HRA indicates that the risk is not above the District's thresholds for triggering T-BACT requirements; therefore, compliance with the District's Risk Management Policy is expected.

District policy APR 1905 also specifies that the increase in emissions associated with a proposed new source or modification not have acute or chronic indices, or a cancer risk greater than the District's significance levels (i.e. acute and/or chronic indices greater than 1 and a cancer risk greater than 20 in a million). As outlined by the HRA Summary in Appendix IV of this document, the emissions increases for this project was determined to be less than significant.

District Rule 4607 Graphic Arts and Paper, Film, Foil, and Fabric Coatings

The purpose of this rule is to limit VOC emissions from graphic arts printing operations, digital printing operations, and paper, film, foil or fabric costing operations. The rule also specifies the administrative requirements for recording and measuring the emissions, and a compliance schedule.

Section 5.1, requires that an operator of any graphic arts printing operations shall not use graphic arts materials in excess of the VOC content limits, as applied in Table 1 and Table 2 of this Section.

The applicant proposed to install a new sheet-fed offset lithographic printing press with maximum sheet size greater than 11 x 17 inches, and the following limits applied:

Table 1. VOC Content Limits for Inks, Coating, & Adhesives	
Material	Grams of VOC per liter (lb/gal), less water & less exempt compounds
Inks	300 (2.5)
Coatings	300 (2.5)

Table 2. VOC Content Limits for Fountain Solution	
Material	Percent VOC by volume
Sheet-fed Offset Lithographic with max sheet size > 11 x 17 inches	5.0%

The applicant proposed to use inks, coatings, and fountain solutions with the following VOC contents for the new press:

Product Identification	VOC content, less water & exempts compounds (lb/gal)	Compliant with Rule 4607?
Ink		
INXCURE LED OSF V.2 Process Black	0.11	Yes
INXCURE LED OSF V.2 Process Cyan	0.11	Yes
INXCURE LED OSF V.2 Process Magenta	0.00	Yes
INXCURE LED OSF V.2 Process Yellow	0.11	Yes
INXCURE LED OSF Base Blue	0.01	Yes
INXCURE LED OSF Base Yellow	0.01	Yes
INXCURE LED OSF Base Green	0.01	Yes
Coating		
Waterbased Acrylic 1422 A, B, C, D, E	0.24	Yes
Fountain Solutions	% VOC by volume	
Saphira 203	0%	Yes
Spahira 303	1.21% - calculated below	Yes

Per applicant, the mix ratio of the fountain solutions is 6 oz of Saphira 203 plus 3 oz of Saphira 303 with 1 gallon of water. Per SDSs, the VOC contents of Saphira 203 and Saphira 303 are 0 (lb/gal) and 6.45 (lb/gal), respectively.

The VOC content by volume of the Spahira 303 fountain solution is calculated as follows:

VOC content = {[(6/16 lb-203) x (0 lb-203/gal-203)] + [(3/16 lb-303) x (6.45 lb-303/gal-303)]} ÷ 1 gal H_2O
= 1.21%

As shown above, the proposed inks, coatings and fountain solutions are compliant materials. The following condition will be listed on the permit to ensure compliance:

- *VOC content of the materials shall not exceed any of the following limits: inks - less than 5% VOC by weight (less water and exempt compounds), or 2.5 lb/gallon (less water and exempt compounds, as applied); coatings - 2.5 lb/gallon (less water and exempt compounds, as applied); inks for high end graphics - less than 30% VOC by weight*

(less water and exempt compounds), or 2.5 lb/gallon (less water and exempt compounds, as applied); fountain solutions - less than 5.0% VOC by volume. [District Rules 2201 and 4607]

Section 5.7 states no operator shall apply coatings unless coatings are applied with equipment operated according to manufacturer's specifications, and only by the use of one of the following types of coating application equipment:

- Flow coater
- Roll coater
- Dip coater,
- Foam coater,
- Die coater,
- Hand application methods, or
- High-Volume, low-pressure (HVLP) spray for air dried coatings
- Other coating application methods which are demonstrated to the APCO to be capable of achieving at least 65% transfer efficiency

The coatings will be applied lithographically, which is a roller type method, and therefore compliance with the requirement of this rule. The following condition will be listed on the permit to ensure compliance:

- *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]*

Section 5.8, requires that an operator shall not use organic solvents for cleaning operations that exceed the VOC content limits specified in Table 7 of this Section.

The applicant proposed to install a new offset lithographic printing press, and the following limits applied:

Table 7 VOC Content Limits for Solvent Cleaning	
Type of Solvent Cleaning Operation	VOC content, less water & exempts compounds (lb/gal)
Lithographic (Offset)	
– Roller Wash – Step 1	0.83
– Roller Wash – Step 2	0.83

The applicant proposed to use cleaning solvents with the following VOC contents for this new press:

Product Identification	VOC content, less water & exempts compounds (lb/gal)	Compliant with Rule 4607?
Saphira Roller Care 1171	0.8	Yes
Saphira presswash 3706A	0.8	Yes

As shown above, the proposed cleaning solvents compliance with the requirements of this rule. The following conditions will be listed on the permit to ensure compliance:

- *Permittee shall utilize organic solvents for cleaning operations that complied with the VOC content limit specified in Table 7 of District Rule 4607. [District Rule 4607]*

- *For a permittee using any solvent containing more than 25 g/L of VOC for organic solvent cleaning, cleaning activities shall be by one of the following methods: wipe cleaning; application of solvent using nonpropellant-induced, hand-held spray bottles; non-atomized solvent flow method, or solvent flushing method. [District Rule 4607]*

- *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]*

- *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 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 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]*

Section 5.9 requires that an operator shall store or dispose of fresh or spent solvents, waste solvent cleaning materials, coatings, adhesives, catalysts, and ink in closed, non-absorbent and non-leaking containers. The container shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. The following condition will be listed on the permit to ensure compliance:

- *Permittee shall store and dispose of fresh or spent solvents and waste solvent cleaning materials such as cloth, paper, etc. in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing material or when it is empty. [District Rules 4607 and 4663]*

Section 5.10 requires that an operator shall properly use and properly operates all graphic arts printing technologies as directed and/or specified by the manufacturer of the printer or graphic arts materials. The following condition will be listed on the permit to ensure compliance:

- *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]*

Section 6.1 requires the operator subject to the requirement of this rule to keep all applicable records on-site for a minimum of five years, and make records available to the APCO, ARB, and EPA upon request.

Section 6.1.1 requires an operator to maintain a current file documenting coatings, inks, adhesives, fountain solutions, wash primers, and solvents in use and in storage. The file shall include a safety data sheet (SDS) or product data sheet showing the material name, manufacturer's name, VOC content as applied, specific mixing instructions, and density.

Section 6.1.2 specifies recordkeeping requirements for facility utilize only compliant materials. Sections 6.1.2.1, 6.1.2.2, and 6.1.2.3 requires the monthly records of the following: 1) the type and amount of all inks, 2) the type and amount of each coating, adhesive, wash primer, and solvent (including cleaning solvent) used; and 3) the type, amount, and percent VOC by volume of fountain solution used. The following conditions will be listed on the permit to ensure compliance:

- *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 safety data sheet (SDS) or product data sheet showing the material name, manufacturer's name, VOC content as applied, mixing instruction, and density. [District Rule 4607]*

- *Monthly records shall be maintained and contain the following information: (a) The name, type, quantity and VOC content (in lb/gal, less water and exempt compounds) of all inks, fountain solutions, wash primers, coatings, adhesives, solvents, and cleaning materials used or stored at the facility; (b) The combined total amount of VOC's emitted from the use of all VOC containing material (in pounds); (c) The dates of operation of this permit unit. [District Rules 2201 and 4607]*

- *All records shall be maintained for a period of at least five years and shall be made available to the District, ARB and EPA upon request. [District Rules 2201, 4607 and 4663]*

Compliance with District Rule 4607 requirements is expected.

District Rule 4663 Organic Solvent Cleaning, Storage, and Disposal

The purpose of this rule is to limit the emissions of volatile organic compounds (VOCs) from organic solvent cleaning and from the storage and disposal of solvents and waste solvent materials.

The applicant proposed to install a new offset lithographic printing press with the use of cleaning solvents, cleaning methods, storage and disposal of solvents and waste solvent materials, as well as the work practices that compliance with all applicable requirements of this rule. Therefore, the following conditions will be listed on the permit to ensure compliance

- *Permittee shall store and dispose of fresh or spent solvents and waste solvent cleaning materials such as cloth, paper, etc. in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing material or when it is empty. [District Rules 4607 and 4663]*

- *Permittee shall maintain a current list of solvents that are in use at the stationary source. The list shall include the following information: (1) the name of the solvent and its manufacturer; (2) the VOC content of each solvent expressed in grams/liter or lb/gal; (3) when the solvent is a mixture of different materials that are blended by the operator, the mix ratio of the batch shall be recorded and the VOC content of the batch shall be calculated and recorded in order to determine compliance with the specified limits of VOC content, as applied; (4) the type of cleaning activity for each solvent that is being used at the stationary source in accordance with the applicable cleaning category specified in Table 1 of this rule; (5) the daily quantity of solvents used in solvent cleaning operations. [District Rule 4663]*

- *All records shall be maintained for a period of at least five years and shall be made available to the District, ARB and EPA upon request. [District Rules 2201, 4607 and 4663]*

California Health & Safety Code 42301.6 (School Notice)

As discussed in Section III of this document, the public notification requirement of California Health and Safety Code 42301.6 is not applicable to this project.

California Environmental Quality Act (CEQA)

CEQA requires each public agency to adopt objectives, criteria, and specific procedures consistent with CEQA Statutes and the CEQA Guidelines for administering its responsibilities under CEQA, including the orderly evaluation of projects and preparation of environmental documents. The District adopted its *Environmental Review Guidelines* (ERG) in 2001. The basic purposes of CEQA are to:

- Inform governmental decision-makers and the public about the potential, significant environmental effects of proposed activities;
- Identify the ways that environmental damage can be avoided or significantly reduced;
- Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible; and
- Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

Greenhouse Gas (GHG) Significance Determination

It is determined that no other agency has or will prepare an environmental review document for the project. Thus the District is the Lead Agency for this project.

The District's engineering evaluation (this document) demonstrates that the project would not result in an increase in project specific greenhouse gas emissions. The District therefore concludes that the project would have a less than cumulatively significant impact on global climate change.

District CEQA Findings

The District performed an Engineering Evaluation (this document) for the proposed project and determined that the project will occur at an existing facility and the project involves negligible expansion of the existing use. Furthermore, the District determined that the project will not have a significant effect on the environment. The District finds that the project is categorically exempt from the provisions of CEQA pursuant to CEQA Guideline § 15301 (Existing Facilities), and finds that the project is exempt per the general rule that CEQA applies only to projects which have the potential for causing a significant effect on the environment (CEQA Guidelines §15061(b)(3)).

Indemnification Agreement/Letter of Credit Determination

According to District Policy APR 2010 (CEQA Implementation Policy), when the District is the Lead or Responsible Agency for CEQA purposes, an indemnification agreement and/or letter of credit may be required. The decision to require an indemnity agreement and/or letter of credit are based on a case-by-case analysis of a particular project's potential for litigation risk, which in turn may be based on a project's potential to generate public concern, its potential for significant impacts, and the project proponent's ability to pay for the costs of litigation without a letter of credit, among other factors.

The proposed project has been determined to have a less than significant environmental impact. In addition, the project does not trigger school notice. Finally, there is no known public concern for this particular facility. Therefore, the District has determined that there is minimal potential for litigation risk for this ATC permitting project, and as such, an Indemnification Agreement and Letter of Credit are not required for this project

IX. RECOMMENDATION

Compliance with all applicable rules and regulations is expected. Pending a successful NSR Public Noticing period, issue Authority to Construct (ATC) N-3606-33-0 subject to the permit conditions listed on the attached draft ATC in Appendix I.

X. BILLING INFORMATION

Annual Permit Fees				
Permit Number	Previous Fee Schedule	Fee Schedule	Fee Description	Annual Fee
N-3606-33-0	N/A	3020-01-D (100 or Greater but less Than 200 hp)	160.9 hp	$ 330

APPENDICES

Appendix I: Draft Authority to Construct (ATC)
Appendix II: BACT Guideline & Top-Down BACT Analysis
Appendix III: Compliance Statement
Appendix IV: RMR Summary

APPENDIX I

Draft Authority to Construct (ATC)

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT

PERMIT NO: N-3606-33-0 **ISSUANCE DATE:** DRAFT

LEGAL OWNER OR OPERATOR: PACIFIC SOUTHWEST CONTAINER
MAILING ADDRESS: ATTN: SR VICE PRESIDENT OF QUALITY & ENVIRONMENTAL MNGT
4530 LECKRON RD
MODESTO, CA 95357

LOCATION: 4530 LECKRON RD
MODESTO, CA 95357

EQUIPMENT DESCRIPTION:
GRAPHIC ARTS PRINTING OPERATION CONSISTING OF A HEIDELBERG MODEL XL162-8+LEOP OFFSET LITHOGRAPHIC PRINTING PRESS WITH AN AMS MODEL XP-9 UV LED CURING SYSTEM

CONDITIONS

1. {1830} 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. {1831} 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. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. 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
5. 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

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

DRAFT

Arnaud Marjollet, Director of Permit Services
N-3606-33-0 Apr 12 2015 11:24AM – GOW Joint Inspection NOT Required

6. 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

7. VOC emissions from this unit shall not exceed 130.0 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit

8. VOC emissions from this unit shall not exceed 39,000 pounds on a rolling 12-month basis. [District Rule 2201] Federally Enforceable Through Title V Permit

9. Total VOC emissions from all permitted graphic arts printing and corrugated board finishing operations in the facility shall not exceed 870 pounds in any one day. [District Rules 2201 and 4607] Federally Enforceable Through Title V Permit

10. Compliance with the daily VOC emissions limit shall be calculated as follows: Total daily VOC emissions = {[VOC Content (ink #1) x Daily usage (ink #1) x (1 - 0.95)] + ... + [VOC Content (ink #n) x Daily usage (ink #n) x (1 - 0.95)]} + {[VOC Content (fountain solution #1) x Daily usage (fountain solution #1)] + [VOC Content (wash primer #1) x Daily usage (wash primer #1)] + [VOC Content (cleanup solvent #1) x Daily usage (cleanup solvent #1)] + ... + [VOC Content (fountain solution #n) x Daily usage (fountain solution #n)] + [VOC Content (wash primer #n) x Daily usage (wash primer #n)] + [VOC Content (cleanup solvent #n) x Daily usage (cleanup solvent #n)]}. [District Rules 2201 and 4607] Federally Enforceable Through Title V Permit

11. Facility-wide VOC emissions shall not exceed 73,403 pounds on a rolling 12-month basis. [District Rule 2201] Federally Enforceable Through Title V Permit

12. VOC content of the materials shall not exceed any of the following limits: inks - less than 5% VOC by weight (less water and exempt compounds), or 2.5 lb/gallon (less water and exempt compounds, as applied); coatings - 2.5 lb/gallon (less water and exempt compounds, as applied); inks for high end graphics - less than 30% VOC by weight (less water and exempt compounds), or 2.5 lb/gallon (less water and exempt compounds, as applied); fountain solutions - less than 5.0% VOC by volume. [District Rules 2201 and 4607] Federally Enforceable Through Title V Permit

13. Permittee shall utilize organic solvents for cleaning operations that complied with the VOC content limit specified in Table 7 of District Rule 4607. [District Rule 4607] Federally Enforceable Through Title V Permit

14. For a permittee using any solvent containing more than 25 g/L of VOC for organic solvent cleaning, cleaning activities shall be by one of the following methods: wipe cleaning; application of solvent using nonpropellant-induced, hand-held spray bottles; non-atomized solvent flow method, or solvent flushing method. [District Rule 4607] Federally Enforceable Through Title V Permit

15. 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

16. 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 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 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

17. Permittee shall store and dispose of fresh or spent solvents and waste solvent cleaning materials such as cloth, paper, etc. in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing material or when it is empty. [District Rules 4607 and 4663] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

18. 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 safety data sheet (SDS) 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

19. Monthly records shall be maintained and contain the following information: (a) The name, type, quantity and VOC content (in lb/gal, less water and exempt compounds) of all inks, fountain solutions, wash primers, coatings, adhesives, solvents, and cleaning materials used or stored at the facility; (b) The combined total amount of VOC's emitted from the use of all VOC containing material (in pounds); (c) The dates of operation of this permit unit. [District Rules 2201 and 4607] Federally Enforceable Through Title V Permit

20. Permittee shall maintain a current list of solvents that are in use at the stationary source. The list shall include the following information: (1) the name of the solvent and its manufacturer; (2) the VOC content of each solvent expressed in grams/liter or lb/gal; (3) when the solvent is a mixture of different materials that are blended by the operator, the mix ratio of the batch shall be recorded and the VOC content of the batch shall be calculated and recorded in order to determine compliance with the specified limits of VOC content, as applied; (4) the type of cleaning activity for each solvent that is being used at the stationary source in accordance with the applicable cleaning category specified in Table 1 of this rule; (5) the daily quantity of solvents used in solvent cleaning operations. [District Rule 4663] Federally Enforceable Through Title V Permit

21. Records of the daily VOC emissions from this unit shall be kept. Daily VOC emissions may be calculated from the monthly materials (inks, coatings, solvents, fountain solutions, wash primers, etc.) usage records and the number of days per calendar month this unit was operated. [District Rule 2201] Federally Enforceable Through Title V Permit

22. Record of the total daily VOC emissions from all permitted graphic arts printing and corrugated board finishing operations in the facility shall be kept. [District Rules 2201 and 4607] Federally Enforceable Through Title V Permit

23. Record of the VOC emissions from this unit, on a rolling 12-month basis, shall be kept. The record shall be updated at least monthly. [District Rule 2201] Federally Enforceable Through Title V Permit

24. Record of the facility-wide VOC emissions, on a rolling 12-month basis, shall be kept. The record shall be updated at least monthly. [District Rule 2201] Federally Enforceable Through Title V Permit

25. All records shall be maintained for a period of at least five years and shall be made available to the District, ARB and EPA inspection upon request. [District Rules 2201, 4607 and 4663] Federally Enforceable Through Title V Permit

APPENDIX II

BACT Guideline & Top-Down BACT Analysis

San Joaquin Valley
Unified Air Pollution Control District

Best Available Control Technology (BACT) Guideline 4.7.2*

Last Update: 10/15/2010

Offset Lithographic Printing - Non-heat Set Press

Pollutant	Achieved in Practice or contained in the SIP	Technologically Feasible	Alternate Basic Equipment
VOC	Using materials with the following VOC contents: Inks: less than 5% VOC by weight (less water and exempt compounds) or less than 30% VOC by weight (less water and exempt compounds) for high end graphics Fountain Solutions: less than 5% by volume for coldset web offset lithographic, less than 5% by volume for sheet-fed offset lithographic with maximum sheet size greater than 11x17 inches, and less than 8% by volume for high end graphics	VOC capture and incineration; or VOC capture and carbon adsorption and using materials with the following VOC contents: - Inks:less than 5% VOC by weight (less water and exempt compounds) or less than 30% VOC by weight (less water and exempt compounds) for high end graphics - Fountain Solutions: less than 5% by volume for coldset web offset lithographics, less than 5% by volume for sheet-fed offset lithographic with maximum sheet size greater than 11x17 inches, and less than 8% by volume for high end graphics	

BACT is the most stringent control technique for the emissions unit and class of source. Control techniques that are not achieved in practice or contained in s a state implementation plan must be cost effective as well as feasible. Economic analysis to demonstrate cost effectiveness is required for all determinations that are not achieved in practice or contained in an EPA approved State Implementation Plan.

***This is a Summary Page for this Class of Source**

Top-Down BACT Analysis for VOC emissions

The following VOC emission control technologies are listed in BACT guideline 4.7.2, Offset Lithographic Printing – Non-heat Set Press:

Step 1 - Identify all control technologies

Achieved in Practice or contained in the SIP:

- Use materials with the following VOC contents:
  - Inks: <5% VOC by weight (less water and exempt compounds) or <30% VOC by weight. (less water and exempt compounds) for high end graphics
  - Fountain Solutions: <5% VOC by volume for coldest web offset lithographic, <5% VOC by volume for sheet-fed offset lithographic with maximum sheet size greater than 11 x17 inches, and <8% VOC by volume for high end graphics

Technologically Feasible:

- VOC capture and incineration
- VOC capture and carbon absorption

Alternate Basic Equipment:
None of any alternate basic equipment is identified in this option.

Step 2 - Eliminate technologically infeasible options

There is no technologically infeasible option.

Step 3 - Rank remaining options by control effectiveness

1. VOC capture and incineration (98% overall capture and control)
2. VOC capture and carbon absorption (95% overall capture and control)
3. Use materials with the following VOC contents:
   - Inks: <5% VOC by weight (less water and exempt compounds) or <30% VOC by weight. (less water and exempt compounds) for high end graphics
   - Fountain Solutions: <5% VOC by volume for coldest web offset lithographic, <5% VOC by volume for sheet-fed offset lithographic with maximum sheet size greater than 11 x17 inches, and <8% VOC by volume for high end graphics

Step 4 - Cost Effectiveness Analysis

A cost-effective analysis will now be performed for each control technology, since none of the control technologies have been eliminated.

Uncontrolled VOC emission from the operation:

The uncontrolled VOC emission from the proposed operation is 39,000 lb-VOC per year (equivalent to 19.5 ton-VOC per year).

For the 1st most effective control option, with VOC capture and incineration (98% overall capture & control)

Equipment Cost

The minimum airflow rate to the RTO would be 6,400 cfm[1]. The cost of the RTO is estimated to be $284,370[2]. This price does not include sales tax, freight expenses, operational and maintenance costs, site preparation, etc.

The printing press must be enclosed to capture 100% of the VOC emissions. This enclosure is estimated to cost $2,000,000[3].

The direct and indirect costs, shown in the following table, are taken from EPA's Office of Air Quality Planning and Standards (OAQPS) document EPA/452/B-02-001, page 42; OAQPS numbers are based on 1999 dollar value. These number are not adjusted for inflation over the past 16-year period. The numbers are presumed be reasonably conservative for the cost-effectiveness analysis.

Cost Item	Cost, $
Direct Costs	
Purchased equipment costs	
RTO cost, A	284,370
Sales tax, Modesto, 7.625%A	21,683
Freight, 0.05A	14,219
Purchased equipment cost, B	$320,272
Direct installation costs	
Foundations & supports, 0.08B	25,622
Handling & erection, 0.14B	44,838
Electrical, 0.04B	12,811
Piping, 0.02B	6,405
Insulation for duct work, 0.01B	3,203
Painting, 0.01B	3,203
Direct installation costs	$96,082
Site preparation	--
Buildings (Enclosure)	2,000,000
Total Direct	$2,416,354

[1] Per applicant, the airflow rate for the blower is 6,357 cfm. Therefore, RTO is presumed to be designed to handle at least 6,400 cfm.

[2] In 2011, Rick Cooley of Oxidation Technology provided a cost quote for RTOs at various flow rates. Based on this information, the cost of an RTO handling 6,400 cfm is $245,300 (2011 dollar). Using 3% inflation over the past four years, the cost of an RTO in 2016 dollars is estimated to be $284,370 [245,300 x $(1+0.03)^5$]. Note that this cost does not include any taxes, freight or installation expenses.

[3] Per applicant, the cost of the enclosure is $2,000,000.

Indirect Costs (installation)	
Engineering, 0.1B	32,027
Construction & field expenses, 0.05B	16,014
Contractor fees, 0.1B	32,027
Start-up, 0.02B	6,405
[4]Performance test, 0.01B	--
Contingencies, 0.03B	9,608
Total Indirect Costs	$96,081
Total Capital Investment (TCI)	$2,512,435

The total capital investment is annualized over 10 years assuming 10% interest. The following formula is used to determine the annualized cost:

Annualized Capital Investment = Initial Capital Investment x Amortization Factor

Amortization Factor = $\left[\frac{0.1(1.1)^{10}}{(1.1)^{10}-1}\right]$ = 0.163 per District policy, amortizing over 10 years at 10%

Therefore,
Annualized Capital Investment = $2,512,435 x 0.163 = **$409,530/year**

Fuel Cost
Fuel Cost = [{(Q x Cp_{Air} x ΔT x (1-HR) x O} – {VOC x HC}](Natural gas cost)

Where,
Q: Airflow rate 6,400 CFM
Cp_{Air}: Specific heat of air (0.0194 Btu/scf - °F)
ΔT: Change in temperature required 1,342°F (1500°F - 158°F)
HR: Heat recovery (0.95)
O: Operational time, 525,600 min/yr (60 min/hr x 8,760 hr/yr)
VOC: Total amount of VOC 39,000 lb/yr
HC: Heat content of the VOCs in the contaminated air stream. The heat content of MEK, which is 13,729 Btu/lb, will be assumed.

Natural gas cost: $7.00/MMBtu (average) for both 2014 and 2015 per U.S. Energy Information Administration(5).

Fuel Cost = **$26,904/year**

Electricity Cost:

$$\text{Power}_{fan} = \frac{1.17*10^{-4}\ Q*\Delta P}{\epsilon}$$

[4] A performance test price is not included because it would have been required even if a company voluntarily proposes to install an RTO.
[5] http://tonto.eia.doe.gov/dnav/ng/hist/n3035ca3m.htm

Where,
ΔP: Pressure drop across system = 4 in. H_2O
∈: Efficiency for fan and motor = 0.6
Q: 6,400 cfm

Power $_{fan}$ = 5 kW

MID's electric rate schedule GS-3 (General Service industrial) for off-peak are $0.0526/kWH[6]. Thus,
Electric cost = ($0.0526/kWH)(5 kW)(24 hr/day)(365 days/yr)
= **$2,304/year**

Operation and Maintenance Costs

Operator Cost			
Operator	0.5 h/shift	$20.00/h	$5,550
Supervisor	15% of operator		$833
Maintenance Cost			
Labor	0.5 h/shift	$20.00	$5,550
Material	100% of labor		$5,550
Indirect Annual Cost (IC)			
Overhead	60% of Labor Cost		$3,330
Administrative Charge	2% TCI		$11,950
Property Taxes	1% TCI		$5,975
Insurance	1% TCI		$5,975
Total:			**$44,713**

Total Cost = $409,530/yr + $26,904/yr + $2,304/yr + $44,713/yr
= $483,451/yr

For VOC capture and incineration with overall VOC control efficiency 98%, the amount of VOC emissions controlled is calculated as follow:

Controlled VOC emissions = 39,000 lb-VOC/year x 1 tons-VOC/2,000 lb-VOC x 0.98
= 19.11 ton-VOC/year

Cost of VOC reduction is calculated as follow:
Cost of VOC reduction = $483,451/year ÷ 19.11 ton-VOC/year
= $25,298/ton-VOC

Since the calculated cost of VOC reduction exceeds the VOC cost effective threshold of $17,500/ton. Therefore, this control technology of utilize a RTO is deemed not cost effective and will be removed from consideration at this time. Please note that the equipment cost catalytic oxidizer is comparable to that of the RTO. However, the RTO fuel cost are found to be 45% less with an assumed heat recovery rate of 95% as opposed to the 70% heat recovery of

[6] http://www.mid.org/tariffs/Rates/GS-3_INDUSTRIAL.pdf

catalytic oxidizer. Therefore, cost analysis for RTO is considered to be representative of catalytic oxidizer technology.

For the 2nd effective control option, with VOC capture and carbon adsorption (95% overall capture & control)

Annual Operating Costs:

Assuming the carbon would be able to capture 20% of its weight in VOC, the annual carbon requirement would be 195,000 pounds (39,000/0.2).

Per cost estimate provided by Calgon, the cost is $2.0/lb-carbon. Therefore, the cost of carbon is calculated to:

The cost of carbon = 195,000 lb-carbon/year x $2.0/lb-carbon = **$390,000/year**

For carbon adsorption system with overall VOC control efficiency 95%, the amount of VOC emissions controlled is calculated as follow:

Controlled VOC emissions = 39,000 lb-VOC/yr x 1 tons-VOC/2,000 lb-VOC x 0.95
= 18.525 ton-VOC/yr

Cost of VOC reduction is calculated as follow:
Cost of VOC reduction = $390,000/year ÷ 18.525 ton-VOC/year
= $21,052/ton-VOC

As demonstrated above, the cost of disposing or replacing the carbon for the carbon adsorption system alone would exceed the VOC cost effectiveness threshold of $17,500/ton. Therefore, this control technology of utilize a carbon adsorption system is deemed not cost effective and will be removed from consideration at this time.

For the 3rd effective control option, Use of inks with a VOC content of <5% VOC by weight (less water and exempt compounds) or <30% VOC by weight (less water and exempt compounds) for high end graphics; and use of fountain solutions with a VOC content of <5% VOC by volume for coldest web offset lithographic, <5% VOC by volume for sheet-fed offset lithographic with maximum sheet size greater than 11 x17 inches, and <8% VOC by volume for high end graphics

The applicant is proposing the use of this control option, therefore, a cost effectiveness analysis for this control option is not required.

Step 5 - Select BACT

BACT requirement of VOC emissions are satisfied by utilize of inks with a VOC content of <5% VOC by weight (less water and exempt compounds) or <30% VOC by weight (less water and exempt compounds) for high end graphics; and use of fountain solutions with a VOC content of <5% VOC by volume for coldest web offset lithographic, <5% VOC by volume for sheet-fed offset lithographic with maximum sheet size greater than 11 x17 inches, and <8% VOC by volume for high end graphics. Therefore, BACT requirement is satisfied.

Appendix III

Compliance Statement

February 12, 2016

Mr. Nick Peirce
San Joaquin Valley Air Pollution Control District
4800 Enterprise Way
Modesto CA 95356-8718

Subject: Compliance Statement for Pacific Southwest Container LLC

Dear Mr. Peirce:

In accordance with Rule 2201, Section 4.15, "Additional Requirements for New Major Sources and Federal Major Modifications," Pacific Southwest Container L.L.C. is pleased to provide this compliance statement regarding its printing press project N-3606-32-0.

All major stationary sources in California owned or operated by Pacific Southwest Container L.L.C., or by any entity controlling, controlled by, or under common control with Pacific Southwest Container L.L.C., and which are subject to emission limitations, are in compliance or on a schedule for compliance with all applicable emission limitations and standards. These sources include one or more of the following facilities:

Facility #1: Pacific Southwest Container L.L.C.- 4530 Leckron Road- Modesto, CA 95357

Based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Please contact me if you have any questions regarding this certification.

Sincerely,

Mac McCullough
Senior Vice President Quality Engineering & Environmental Mgmt.
Pacific Southwest Container L.L.C.

APPENDIX IV

RMR Summary

San Joaquin Valley Air Pollution Control District
Risk Management Review

To:	Wai-Man So – Permit Services
From:	Tadeh Issakhanian – Technical Services
Date:	March 23, 2016
Facility Name:	Pacific Southwest Container
Location:	4530 Leckron Rd. Modesto
Application #(s):	N-3606-33-0
Project #:	N-1160509

A. RMR SUMMARY

RMR Summary			
Categories	**Printing Operation (Unit 33-0)**	**Project Totals**	**Facility Totals**
Prioritization Score	0.00	0.00	>1
Acute Hazard Index	0.00	0.00	0.01
Chronic Hazard Index	0.00	0.00	0.15
Maximum Individual Cancer Risk	0.00	0.00	2.48E-06
T-BACT Required?	**No**		
Special Permit Requirements?	**No**		

B. RMR REPORT

I. Project Description

Technical Services received a request on March 16, 2016, to perform a Risk Management Review for a proposed installation of a non-heatset offset lithographic printing press equipped with a LED UV curing system.

II. Analysis

The MSDS sheets for the coatings used in the operation were reviewed by CAS# for Toxic Air Contaminants (TACs). The values were entered into the Auto body Shop coating spreadsheet to calculate the TACs' emissions, and input into the San Joaquin Valley APCD's Hazard Assessment and Reporting Program (SHARP). In accordance with the District's Risk Management Policy for Permitting New and Modified Sources (APR 1905, May 28, 2015), risks from the proposed unit's toxic emissions were prioritized using the procedure in the 1990 CAPCOA Facility Prioritization Guidelines. The prioritization score for this proposed unit was greater than 1.0 (see RMR Summary Table). Therefore, a refined health risk assessment was required. The AERMOD model was used, with the parameters outlined below and meteorological data for 2010-2014 from Modesto to determine the

dispersion factors (i.e., the predicted concentration or X divided by the normalized source strength or Q) for a receptor grid. These dispersion factors were input into the SHARP Program, which then used the Air Dispersion Modeling and Risk Tool (ADMRT) of the Hot Spots Analysis and Reporting Program Version 2 (HARP 2) to calculate the chronic and acute hazard indices and the carcinogenic risk for the project.

Analysis Parameters Unit 33-0			
VOC Emissions (lb/day)	30.2	Location Type	Urban
VOC Emissions (lb/yr)	7,174	Closest Receptor (m)	152
Source Type	Volume	Type of Receptor	Business
# of Openings	5		

Analysis Parameters Opening #1			
Length of Side (m)	6.25	Release Height (m)	2.13
Initial Lateral Dimension (m)	1.45	Initial Vertical Dimension (m)	3.4

Analysis Parameters Opening #2			
Length of Side (m)	8.06	Release Height (m)	2.13
Initial Lateral Dimension (m)	1.88	Initial Vertical Dimension (m)	3.4

Analysis Parameters Opening #3			
Length of Side (m)	9.54	Release Height (m)	2.13
Initial Lateral Dimension (m)	2.22	Initial Vertical Dimension (m)	3.4

Analysis Parameters Opening #4			
Length of Side (m)	9.14	Release Height (m)	2.13
Initial Lateral Dimension (m)	2.13	Initial Vertical Dimension (m)	3.4

Analysis Parameters Opening #5			
Length of Side (m)	7.47	Release Height (m)	2.13
Initial Lateral Dimension (m)	3.4	Initial Vertical Dimension (m)	2.13

An AAQA was requested; however, since this project only contains VOC emissions, an AAQA is not required.

III. Conclusion

The acute and chronic indices are below 1.0 and the cancer risk factor associated with the project is less than 1.0 in a million. **In accordance with the District's Risk Management Policy, the project is approved without Toxic Best Available Control Technology (T-BACT).**

These conclusions are based on the data provided by the applicant and the project engineer. Therefore, this analysis is valid only as long as the proposed data and parameters do not change.

IV. Attachments

A. RMR request from the project engineer
B. Additional information from the applicant/project engineer
C. Prioritization score w/ toxic emissions summary
D. Facility Summary