



**MAY 05 2016**

Robert A. Bruna  
Sacramento Container Corporation  
909 Union St  
Kingsburg, CA 93631

**Re: Notice of Preliminary Decision - Authority to Construct**  
**Facility Number: C-3609**  
**Project Number: C-1160266**

Dear Mr. Bruna:

Enclosed for your review and comment is the District's analysis of Central California Sheets, LLC's and Sacramento Container Corporation's application for an Authority to Construct for the modification of the corrugated board manufacturing operation, permit unit C-8609-2, to increase the daily and annual throughput limit and the modification of the corrugated paper box manufacturing and printing machines, permit units C-3609-2, '-4, '-5, '-6, '-8 and '-9, to increase the combined annual VOC limit and the, at 909 Union St, Kingsburg.

The notice of preliminary decision for this project will be published approximately three days from the date of this letter. After addressing all comments made during the 30-day public notice and 45-day EPA notice comment periods, the District intends to issue the Authority to Construct. Please submit your written comments on this project within the 30-day public comment period, as specified in the enclosed public notice.

Thank you for your cooperation in this matter. If you have any questions regarding this matter, please contact Mr. Jesse A. Garcia of Permit Services at (559) 230-5918.

Sincerely,



Arnaud Marjollet  
Director of Permit Services

AM:jag

Enclosures

cc: Tung Le, CARB (w/ enclosure) via email  
Gerardo C. Rios, EPA (w/ enclosure) via email  
Carla Presetyo Jo, Yorke Engineering, LLC (w/enclosure) via email

**Sayed Sadredin**  
Executive Director/Air Pollution Control Officer

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

**Central Region (Main Office)**  
1990 E. Gettysburg Avenue  
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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



MAY 05 2016

Jason J. Cook  
Central California Sheets, LLC  
909 Union St  
Kingsburg, CA 93631

**Re: Notice of Preliminary Decision - Authority to Construct**  
**Facility Number: C-8609**  
**Project Number: C-1160267**

Dear Mr. Cook:

Enclosed for your review and comment is the District's analysis of Central California Sheets, LLC's and Sacramento Container Corporation's application for an Authority to Construct for the modification of the corrugated board manufacturing operation, permit unit C-8609-2, to increase the daily and annual throughput limit and the modification of the corrugated paper box manufacturing and printing machines, permit units C-3609-2, '-4, '-5, '-6, '-8 and '-9, to increase the combined annual VOC limit and the, at 909 Union St, Kingsburg.

The notice of preliminary decision for this project will be published approximately three days from the date of this letter. After addressing all comments made during the 30-day public notice and 45-day EPA notice comment periods, the District intends to issue the Authority to Construct. Please submit your written comments on this project within the 30-day public comment period, as specified in the enclosed public notice.

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**San Joaquin Valley Air Pollution Control District**  
**Authority to Construct Application Review**  
Flexographic Printing and Corrugated Board Manufacturing Operations

Facility Name: Central California Sheets, LLC & Sacramento Container Corporation      Date: April 25, 2016  
Mailing Address: 909 Union Street      Engineer: Jesse A. Garcia  
                         Kingsburg, CA 93631      Lead Engineer: Joven Refuerzo  
Contact Person: Carla Presetyo Jo, PE of Yorke Engineering, LLC (Consultant)  
                         Telephone: (559) 225-2755  
                         Cell Phone: (559) 908-6979  
                         Email: CJo@YorkeEngr.com  
Application #s: C-8609-2-1 and C-3609-2-2, '-4-2, '-5-2, '-6-2, '-8-1, '-9-1  
Project #: C-1160267 and C-1160266  
Deemed Complete: April 5, 2016

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**I. Proposal**

Central California Sheets, LLC (CCS), facility C-8609, and Sacramento Container Corporation (SCC), facility C-3609, have requested Authority to Construct (ATC) permits to modify their existing operations as follows:

- Increase the throughput limit for the existing cardboard manufacturing operation, C-8609-2, from 7,000,000 ft<sup>2</sup>/day and 1,500,000,000 ft<sup>2</sup>/year to 8,000,000 ft<sup>2</sup>/day and 2,200,000,000 ft<sup>2</sup>/year, and
- Increase the Specific Limiting Condition (SLC) from the printing machines, C-3609-2, '-4, '-5, '-6, '-8, '-9, from 1,881 lbs-VOC/year to 6,184 lb-VOC/year.

See Appendix A for existing Permits to Operate (PTOs).

As established in Project C-1132539, these two separate business entities have different facility numbers; however, are the same stationary source as defined in Rule 2201, Section 3.39.1.

**II. Applicable Rules**

Rule 2020      Exemptions (12/18/14)  
Rule 2201      New and Modified Stationary Source Review Rule (2/18/16)  
Rule 2410      Prevention of Significant Deterioration (6/16/11)  
Rule 2520      Federally Mandated Operating Permits (6/21/01)  
Rule 4001      New Source Performance Standards (4/14/99)  
Rule 4002      National Emissions Standards for Hazardous Air Pollutants (5/20/04)  
Rule 4101      Visible Emissions (2/17/05)  
Rule 4102      Nuisance (12/17/92)

Rule 4607 Graphic Arts and Paper, Film, Foil, and Fabric Coatings (12/18/08)  
Rule 4653 Adhesives and Sealants (9/16/10)  
Rule 4661 Organic Solvents (9/20/07)  
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

The facilities are both located at 909 Union Street in Kingsburg, California. The District has verified that the equipment is located within 1,000 feet of the outer boundary of a K-12 school.

As established in Project C-1150134:

The majority of the building vents and doors are not located within 1,000 feet of the outer boundary of a K-12 school. The building does have one exhaust vent, one roof intake hood, and two emergency exit doors within 1,000 feet of the outer boundary of a K-12 school. The exhaust vent has been permanently closed. The roof intake hood has backdraft protection and the emergency doors will remain closed during all operating hours. The following conditions will ensure compliance with these requirements:

- The building exhaust vent located within 1,000 feet of the outer boundary of a K-12 school shall be permanently closed. [CH&SC 42301.6]
- The building emergency doors located within 1,000 feet of the outer boundary of a K-12 school shall remain closed during all operating hours. [CH&SC 42301.6]
- The building roof intake hood located within 1,000 feet of the outer boundary of a K-12 school shall be operated with backdraft protection during all operating hours. [CH&SC 42301.6]

Therefore, the public notification requirement of California Health and Safety Code 42301.6 are not applicable to this project.

### IV. Process Description

CCS, C-8609, manufactures corrugated paper

The corrugator system, C-8609-2, consists of a set of in-line machines designed to adhere together multiple sheets of paper to form single or double wall corrugated cardboard. Reels of paper are fed into the corrugator, where the paper is conditioned with heat and steam, and fed between large corrugating rollers that give the paper its fluted shape. Starch is applied to the tips of the flutes on one side and the inner liner is glued to the fluting. The corrugated fluting medium with one liner attached to it is called single face web and travels along the machine toward the double backer where the single face web meets the outer line and forms corrugated board. The corrugated board is then cut and stacked.

The existing corrugator is capable of producing double wall corrugated cardboard. Double layer

corrugated cardboard is made up of two corrugated layers separated by a center flat layer all between two outer flat layers.

The adhesives for the corrugator will be prepared onsite from starch, borax, sodium hydroxide, and water. These ingredients are loaded into a mixer along with the starch, which is mechanically conveyed from the starch silo to the mixer. Once the mixing process is complete, the adhesive will be pumped into the holding tanks, to be used in the corrugator system.

There is also a scrap handling system which consists of ducting to collect scrap paper from the corrugator. The scrap handling system is served by a baghouse. The scrap handling system is shared with the SCC (C-3609) which operates graphic arts and adhesive machines and box making machines. This shared scrap handling system will also collect scrap material from the SCC box making machines.

#### SCC, C-3609, manufactures corrugated paper boxes

The facility uses water-based inks to print logos on corrugated paper sheets along with water-based adhesives to form the folded sheets into boxes.

The existing flexographic printer machines print logos on corrugated paper sheets, then scores, slots, and die cuts the corrugated sheets which later may be folded into various types of boxes. These machines have the capability of printing both low-end and high-end graphics. For high-end graphics printing, a higher VOC content ink is required compared to low-end graphics printing; however, the resulting image is a better quality than an image from low-end graphics printing.

The die cutters generate corrugated paper scrap which is collected by a baghouse. The collection of the corrugated paper scrap is performed solely so the material can be recycled and the baghouse is not intended to operate as an emissions control device. This scrap collection system and baghouse is an enclosed system and is also shared with equipment permitted under facility number C-8609, CSS.

The facilities may operate 24 hours per day, 365 days per year.

## **V. Equipment Listing**

### Pre-Project Equipment Description

C-8609-2-0: CORRUGATED BOARD MANUFACTURING OPERATION AND A STARCH-BASED ADHESIVE MIXING SYSTEM WITH PERMIT EXEMPT SCRAP HANDLING SYSTEM SERVED BY A BAGHOUSE (LOW EMITTING UNIT)

C-3609-2-1: MARTIN MODEL 924 FLEXO-PRINTER/FOLDER/GLUER CORRUGATED PAPER BOX MANUFACTURING MACHINE WITH A PERMIT EXEMPT DIE CUTTER SERVED BY A SCRAP COLLECTION SYSTEM WITH A BAGHOUSE (UNCONTROLLED PM10 EMISSIONS LESS THAN 2.0 LB/DAY)

- C-3609-4-1: MARTIN MODEL 924 FLEXO-PRINTER/FOLDER/GLUER CORRUGATED PAPER BOX MANUFACTURING MACHINE WITH A PERMIT EXEMPT DIE CUTTER SERVED BY A SCRAP COLLECTION SYSTEM WITH A BAGHOUSE (UNCONTROLLED PM10 EMISSIONS LESS THAN 2.0 LB/DAY)
- C-3609-5-1: WARD MODEL 4-C FLEXO-PRINTER/FOLDER/GLUER CORRUGATED PAPER BOX MANUFACTURING MACHINE WITH A PERMIT EXEMPT DIE CUTTER SERVED BY A SCRAP COLLECTION SYSTEM WITH A BAGHOUSE (UNCONTROLLED PM10 EMISSIONS LESS THAN 2.0 LB/DAY)
- C-3609-6-1: WARD MODEL # 16000 SV (S/N 16331) 4-COLOR FLEXOGRAPHIC PRINTER CORRUGATED PAPER BOX MACHINE WITH A PERMIT EXEMPT ROTARY DIE CUTTER SERVED BY A SCRAP COLLECTION SYSTEM WITH A BAGHOUSE (UNCONTROLLED PM10 EMISSIONS LESS THAN 2.0 LB/DAY)
- C-3609-8-0: MARTIN MODEL 924 FLEXO-PRINTER/FOLDER/GLUER CORRUGATED PAPER BOX MANUFACTURING MACHINE WITH A PERMIT EXEMPT DIE CUTTER SERVED BY A SCRAP COLLECTION SYSTEM WITH A BAGHOUSE (UNCONTROLLED PM10 EMISSIONS LESS THAN 2.0 LB/DAY)
- C-3609-9-0: WARD MODEL # 16000 SV (S/N 16331) 4-COLOR FLEXOGRAPHIC PRINTER CORRUGATED PAPER BOX MACHINE WITH A PERMIT EXEMPT ROTARY DIE CUTTER SERVED BY A SCRAP COLLECTION SYSTEM WITH A BAGHOUSE (UNCONTROLLED PM10 EMISSIONS LESS THAN 2.0 LB/DAY)

Since the ATCs C-3609-2-1, '-4-1, '-5-1, '-6-1, '-8-0 and '-9-0 have not been implemented yet but are being used as the base document for this project, the following typical condition will be included on the ATCs issued in this project to ensure compliance:

- Authority to Construct (ATC) C-3609-XX-XX shall be implemented concurrently, or prior to the modification and startup of the equipment authorized by this Authority to Construct. [District Rule 2201]

The ATCs used as the base documents for this project are included in Appendix A.

Additionally, since ATCs C-3609-2-2, '-4-4, '-5-2, '-6-2, '-8-1, '-9-1 are expected to be implemented concurrently, the following typical condition will be included on the ATCs issued in this project:

- This Authority to Construct (ATC) shall be implemented concurrently with ATCs C-3609-2-2, '-4-4, '-5-2, '-6-2, '-8-1, '-9-1. [District Rule 2201]

#### ATC Permit Equipment Description

- C-8609-2-1: MODIFICATION OF CORRUGATED BOARD MANUFACTURING OPERATION AND A STARCH-BASED ADHESIVE MIXING SYSTEM WITH PERMIT EXEMPT SCRAP HANDLING SYSTEM SERVED BY A BAGHOUSE (LOW

EMITTING UNIT): INCREASE CORRUGATED BOARD PROCESSED LIMIT FROM 7,000,000 SQ FT/DAY AND 1,500,000,000 SQ FT/YEAR TO 8,000,000 SQ FT/DAY AND 2,200,000,000 SQ FT/YEAR

- C-3609-2-2: MODIFICATION OF MARTIN MODEL 924 FLEXO-PRINTER/FOLDER/GLUER CORRUGATED PAPER BOX MANUFACTURING MACHINE WITH A PERMIT EXEMPT DIE CUTTER SERVED BY A SCRAP COLLECTION SYSTEM WITH A BAGHOUSE (UNCONTROLLED PM10 EMISSIONS LESS THAN 2.0 LB/DAY): INCREASE SPECIFIC LIMITING CONDITION FROM 1,881 LBS-VOC/YEAR TO 6,184 LBS-VOC/YEAR
- C-3609-4-2: MODIFICATION OF MARTIN MODEL 924 FLEXO-PRINTER/FOLDER/GLUER CORRUGATED PAPER BOX MANUFACTURING MACHINE WITH A PERMIT EXEMPT DIE CUTTER SERVED BY A SCRAP COLLECTION SYSTEM WITH A BAGHOUSE (UNCONTROLLED PM10 EMISSIONS LESS THAN 2.0 LB/DAY): INCREASE SPECIFIC LIMITING CONDITION FROM 1,881 LBS-VOC/YEAR TO 6,184 LBS-VOC/YEAR
- C-3609-5-2: MODIFICATION OF WARD MODEL 4-C FLEXO-PRINTER/FOLDER/GLUER CORRUGATED PAPER BOX MANUFACTURING MACHINE WITH A PERMIT EXEMPT DIE CUTTER SERVED BY A SCRAP COLLECTION SYSTEM WITH A BAGHOUSE (UNCONTROLLED PM10 EMISSIONS LESS THAN 2.0 LB/DAY): INCREASE SPECIFIC LIMITING CONDITION FROM 1,881 LBS-VOC/YEAR TO 6,184 LBS-VOC/YEAR
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### Post-Project Equipment Description

- C-8609-2-1: CORRUGATED BOARD MANUFACTURING OPERATION AND A STARCH-BASED ADHESIVE MIXING SYSTEM WITH PERMIT EXEMPT SCRAP HANDLING SYSTEM SERVED BY A BAGHOUSE (LOW EMITTING UNIT)
- C-3609-2-2: MARTIN MODEL 924 FLEXO-PRINTER/FOLDER/GLUER CORRUGATED PAPER BOX MANUFACTURING MACHINE WITH A PERMIT EXEMPT DIE CUTTER SERVED BY A SCRAP COLLECTION SYSTEM WITH A BAGHOUSE (UNCONTROLLED PM10 EMISSIONS LESS THAN 2.0 LB/DAY)
- C-3609-4-2: MARTIN MODEL 924 FLEXO-PRINTER/FOLDER/GLUER CORRUGATED PAPER BOX MANUFACTURING MACHINE WITH A PERMIT EXEMPT DIE CUTTER SERVED BY A SCRAP COLLECTION SYSTEM WITH A BAGHOUSE (UNCONTROLLED PM10 EMISSIONS LESS THAN 2.0 LB/DAY)
- C-3609-5-2: WARD MODEL 4-C FLEXO-PRINTER/FOLDER/GLUER CORRUGATED PAPER BOX MANUFACTURING MACHINE WITH A PERMIT EXEMPT DIE CUTTER SERVED BY A SCRAP COLLECTION SYSTEM WITH A BAGHOUSE (UNCONTROLLED PM10 EMISSIONS LESS THAN 2.0 LB/DAY)
- C-3609-6-2: WARD MODEL # 16000 SV (S/N 16331) 4-COLOR FLEXOGRAPHIC PRINTER CORRUGATED PAPER BOX MACHINE WITH A PERMIT EXEMPT ROTARY DIE CUTTER SERVED BY A SCRAP COLLECTION SYSTEM WITH A BAGHOUSE (UNCONTROLLED PM10 EMISSIONS LESS THAN 2.0 LB/DAY)
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## **VI. Emission Control Technology Evaluation**

### C-8609

The applicant has proposed the use of starch-based adhesives (mixture of starch, borax, sodium hydroxide, and water) which do not contain any volatile organic compounds.

### C-3609

VOC emissions are the primary pollutant emitted from corrugated paper box manufacturing. VOC emissions will be reduced by the use of low-VOC inks. No VOC-containing cleaning



solvents, or other VOC-containing materials are proposed with this project.

## VII. General Calculations

### A. Assumptions

For all units:

- VOCs are the only pollutant emitted from the operations
- The facilities may operate 24 hr/day and 365 days/year (worst-case)

For C-8609-2:

- The pre-project throughput limit is: 7,000,000 ft<sup>2</sup>/day and 1,500,000,000 ft<sup>2</sup>/year
- The post-project throughput limit is: 8,000,000 ft<sup>2</sup>/day and 2,200,000,000 ft<sup>2</sup>/year

### B. Emission Factors

For CCS, C-8609-2, the emission factor as taken from the current PTO = 8 lb-VOC/10<sup>6</sup> ft<sup>2</sup> of corrugated board processed.

A list of proposed materials with the VOC content is provided below for the units at SCC, C-3609.

<b>Proposed Inks/Materials List</b>		
Material Name	VOC Content (lb/gal)	Source
Advanced Color Systems, Flexo Ink	0.011	MSDS 10
Advanced Color Systems, Flexo Ink	0.03	MSDS 20
Advanced Color Systems, Flexo Ink	0.03	MSDS 30
Advanced Color Systems, Flexo Ink	0.164	MSDS 50
Advanced Color Systems, Flexo Ink	0.672	MSDS 60
Adhesive Products, Inc, Adhesive 1050	0.0312	MSDS

### C. Calculations

#### 1. Pre-Project Potential to Emit (PE1)

##### C-8609-2

The daily and annual emissions are calculated as follows:

$$\text{Daily PE1} = 8 \text{ lb-VOC}/10^6 \text{ ft}^2 \times 7,000,000 \text{ ft}^2/\text{day} = 56.0 \text{ lb-VOC}/\text{day}$$

$$\text{Annual PE1} = 8 \text{ lb-VOC}/10^6 \text{ ft}^2 \times 1,500,000,000 \text{ ft}^2/\text{year} = 12,000 \text{ lb-VOC}/\text{year}$$

##### C-3609-2, '-4, '-5, '-6, '-8, '-9

The daily emissions are as stated on the current permits and the annual emissions are as stated on the current permits in the form of the SLC.

<b>C-3609 Pre-Project Potential to Emit (PE1)</b>		
Permit	Daily PE1 (lb/day)	Annual PE1 (lb/year)
C-3609-2	4.8	1,881
C-3609-4	4.8	
C-3609-5	4.8	
C-3609-6	4.4	
C-3609-8	4.8	
C-3609-9	4.4	

**2. Post Project Potential to Emit (PE2)**

C-8609-2

The daily and annual emissions are calculated as follows:

Daily PE2 = 8 lb-VOC/10<sup>6</sup> ft<sup>2</sup> x 8,000,000 ft<sup>2</sup>/day = 64.0 lb-VOC/day

Annual PE2 = 8 lb-VOC/10<sup>6</sup> ft<sup>2</sup> x 2,200,000,000 ft<sup>2</sup>/year = 17,600 lb-VOC/year

C-3609-2, '-4, '-5, '-6, '-8, '-9

There is no proposed change in the daily emissions for these permit units. Therefore, Daily PE2 = Daily PE1. The annual emissions are as proposed by the applicant in the form of an increased SLC. The PE2 is summarized in the table below:

<b>C-3609 Post-Project Potential to Emit (PE2)</b>		
Permit	Daily PE2 (lb/day)	Annual PE2 (lb/year)
C-3609-2	4.8	6,184
C-3609-4	4.8	
C-3609-5	4.8	
C-3609-6	4.4	
C-3609-8	4.8	
C-3609-9	4.4	

**3. Project Stationary Source Potential to Emit (SSPE)**

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 is taken as SSPE2 of Project C-1150134, except for unit -7 which is taken from the original permitting project C-1142688:

<b>SSPE1 (lb/year)</b>					
Permit Unit	NO <sub>x</sub>	SO <sub>x</sub>	PM <sub>10</sub>	CO	VOC
C-8609-1-0	0	0	37	0	0
C-8609-2-0	0	0	0	0	12,000
C-8609-3-0	3,066	3,620	1,678	8,035	1,217
C-3609-1-0	104	0	7	103	66
C-3609-2-1	0	0	0	0	1,881
C-3609-4-1	0	0	0	0	
C-3609-5-1	0	0	0	0	
C-3609-6-1	0	0	0	0	
C-3609-8-0	0	0	0	0	
C-3609-9-0	0	0	0	0	
C-3609-7-0	0	0	0	0	
<b>SSPE1</b>	<b>3,170</b>	<b>3,620</b>	<b>1,722</b>	<b>8,138</b>	<b>18,957</b>

#### 4. 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.

<b>SSPE2 (lb/year)</b>					
Permit Unit	NO <sub>x</sub>	SO <sub>x</sub>	PM <sub>10</sub>	CO	VOC
C-8609-1-0	0	0	37	0	0
C-8609-2-0	0	0	0	0	17,600
C-8609-3-0	3,066	3,620	1,678	8,035	1,217
C-3609-1-0	104	0	7	103	66
C-3609-2-1	0	0	0	0	6,184
C-3609-4-1	0	0	0	0	
C-3609-5-1	0	0	0	0	
C-3609-6-1	0	0	0	0	
C-3609-8-0	0	0	0	0	
C-3609-9-0	0	0	0	0	
C-3609-7-0	0	0	0	0	
<b>SSPE2</b>	<b>3,170</b>	<b>3,620</b>	<b>1,722</b>	<b>8,138</b>	<b>28,860</b>

## 5. 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 the facility for less than 12 months)
- Fugitive emissions, except for the specific source categories specified in 40 CFR 51.165

<b>Major Source Determination (lb/year)</b>					
	NO <sub>x</sub>	SO <sub>x</sub>	PM <sub>10</sub>	CO	VOC
SSPE1	3,170	3,620	1,722	8,138	18,957
SSPE2	3,170	3,620	1,722	8,138	28,860
Major Source Threshold	20,000	140,000	140,000	200,000	20,000
Major Source?	No	No	No	No	Yes

As seen in the table above, the facility is not an existing Major Source; however, is becoming a Major Source for VOC emissions as a result of this project.

### Rule 2410 Major Source Determination

The facility or the equipment evaluated under this project is listed as one of the categories specified in 40 CFR 52.21 (b)(1)(iii). Therefore the PSD Major Source threshold is 100 tpy for any regulated NSR pollutant.

<b>PSD Major Source Determination (tons/year)</b>						
	NO <sub>2</sub>	VOC	SO <sub>2</sub>	CO	PM	PM <sub>10</sub>
Estimated Facility PE before Project Increase	1.6	9.5	1.8	4.0	0.9	0.9
PSD Major Source Thresholds	100	100	100	100	100	100
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.

## 6. 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.

BE = Pre-project Potential to Emit 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 Rule 2201

As a worse case, since the emissions units are located at a Major Source, the BE = HAE = 0.

## 7. 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."

Since this facility is a major source for VOCs the project's PE2 is compared to the SB 288 Major Modification Thresholds in the following table in order to determine if the SB 288 Major Modification calculation is required.

<b>SB 288 Major Modification Thresholds</b>			
<b>Pollutant</b>	<b>Project PE2 (lb/year)</b>	<b>Threshold (lb/year)</b>	<b>SB 288 Major Modification Calculation Required?</b>
VOC	23,784	50,000	No

Since none of the SB 288 Major Modification Thresholds are surpassed with this project, this project does not constitute an SB 288 Major Modification.

## 8. Federal Major Modification

District Rule 2201, Section 3.17 states that Federal Major Modifications are the same as "Major Modification" as defined in 40 CFR 51.165 and part D of Title I of the CAA. SB 288 Major Modifications are not federal major modifications if they meet the criteria of the "Less-Than-Significant Emissions Increase" exclusion.

A Less-Than-Significant Emissions Increase exclusion is for an emissions increase for the project, or a Net Emissions Increase for the project (as defined in 40 CFR 51.165 (a)(2)(ii)(B) through (D), and (F)), that is not significant for a given regulated NSR pollutant, and therefore is not a federal major modification for that pollutant.

- To determine the post-project projected actual emissions from existing units, the provisions of 40 CFR 51.165 (a)(1)(xxviii) shall be used.
- To determine the pre-project baseline actual emissions, the provisions of 40 CFR 51.165 (a)(1)(xxxv)(A) through (D) shall be used.
- If the project is determined not to be a federal major modification pursuant to the provisions of 40 CFR 51.165 (a)(2)(ii)(B), but there is a reasonable possibility that the project may result in a significant emissions increase, the owner or operator shall comply with all of the provisions of 40 CFR 51.165 (a)(6) and (a)(7).
- Emissions increases calculated pursuant to this section are significant if they exceed the significance thresholds specified in the table below.

<b>Significant Threshold (lb/year)</b>	
Pollutant	Threshold (lb/year)
VOC	0

The Net Emissions Increases (NEI) for purposes of determination of a “Less-Than-Significant Emissions Increase” exclusion will be calculated below to determine if this project qualifies for such an exclusion.

Net Emission Increase for Existing Units (NEI<sub>E</sub>)

The project’s emission increase for each pollutant is equal to the sum of the differences between the projected actual emissions or PE and the baseline actual emissions (BAE) (for existing emission units) or the sum of the potentials to emit (for new emission units).

$$NEI_E = PAE - BAE - UBC$$

Where: PAE = Projected Actual Emissions, and  
 BAE = Baseline Actual Emissions  
 UBC = Unused baseline capacity

The applicant provided actual emissions calculations from the previous 24 months for C-3609-2, ‘-4, ‘-5, ‘-6, ‘-8 and ‘-9 based off of their monthly inks, adhesives and solvents usage amounts which equals 5,075 lbs-VOC. Therefore, the average annual emissions = 2,538 lbs-VOC/year.

Additionally, the applicant provided actual emissions calculations from the previous 24 months for C-8609-2 based off of their throughput amounts which equals 21,559 lbs-VOC. Therefore, the average annual emissions = 10,780 lbs-VOC/year.

$$\begin{aligned} \text{Therefore, the total BAE} &= 2,538 \text{ lbs-VOC/year} + 10,780 \text{ lbs-VOC/year} \\ &= 13,318 \text{ lbs-VOC/year} \end{aligned}$$

PAE is assumed to equal PE2 and UBC = 0 lb/year since there is a proposed increase in annual utilization of the units; therefore,

$$\begin{aligned}
 NEI_E &= PAE - BAE - UBC \\
 &= (17,600 \text{ lb-VOC/year} + 6,184 \text{ lb-VOC/year}) - 13,318 \text{ lb-VOC/year} - 0 \text{ lb-VOC/year} \\
 &= 10,466 \text{ lb-VOC/year}
 \end{aligned}$$

The NEI for this project will be greater than the Federal Major Modification threshold of 0 lb/year for VOC. Therefore, this project does not qualify for a "Less-Than-Significant Emissions Increase" exclusion and is thus determined to be a Federal Major Modification for VOC.

Federal Offset quantities are calculated below:

**Federal Offset Quantities:**

The Federal offset quantity is calculated only for the pollutants for which the project is a Federal Major Modification. The Federal offset quantity is the sum of the annual emission changes for all new and modified emission units in a project calculated as the potential to emit after the modification (PE2) minus the actual emissions (AE) during the baseline period for each emission unit times the applicable federal offset ratio. There are no special calculations performed for units covered by an SLC.

VOC	Federal Offset Ratio		1.5
Permit No.	Actual Emissions (lb/year)	Potential Emissions (lb/year)	Emissions Change (lb/yr)
C-3609-2, '-4, '-5, '-6, '-8 and '-9	2,538	6,184	3,646
C-8609-2	10,780	17,600	6,820
<b>Net Emission Change (lb/year):</b>			<b>10,466</b>
<b>Federal Offset Quantity: (NEC * 1.5)</b>			<b>15,699</b>

**9. 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 and which are emitted in this project are: (See 52.21 (b) (23) definition of significant)

- NO2 (as a primary pollutant)
- SO2 (as a primary pollutant)
- CO
- PM
- PM10

**I. Project Emissions Increase - New Major Source Determination**

The post-project potentials to emit from all new and modified units are compared to the PSD major source thresholds to determine if the project constitutes a new major source subject to PSD requirements.

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)(i). The PSD Major Source threshold is 250 tpy for any regulated NSR pollutant.

<b>PSD Major Source Determination: Potential to Emit (tons/year)</b>						
	<b>NO2</b>	<b>VOC</b>	<b>SO2</b>	<b>CO</b>	<b>PM</b>	<b>PM10</b>
Total PE from New and Modified Units	0	11.9	0	0	0	0
PSD Major Source threshold	250	250	250	250	250	250
New PSD Major Source?	N	N	N	N	N	N

As shown in the table above, the potential to emit for the project, by itself, does not exceed any PSD major source threshold. Therefore Rule 2410 is not applicable and no further analysis is required.

**10. Quarterly Net Emissions Change (QNEC)**

The Quarterly Net Emissions Change is used to complete the emission profile screen for the District's PAS database. The QNEC shall be calculated as follows:

C-8609-2

$$QNEC = (PE2 - PE1) \div 4$$

<b>Quarterly NEC [QNEC]</b>			
	<b>PE2 (lb/qtr)</b>	<b>PE1 (lb/qtr)</b>	<b>QNEC (lb/qtr)</b>
NO <sub>x</sub>	0	0	0
SO <sub>x</sub>	0	0	0
PM <sub>10</sub>	0	0	0
CO	0	0	0
VOC	4,400	3,000	1,400



C-3609-2, '-4, '-5, '-6, '-8, '-9

$$QNEC = (PE2_{SLC} - PE1_{SLC}) \div 4$$

All QNEC values for C-3609 will be placed on the lowest numbered permit C-3609-2.

<b>Quarterly NEC [QNEC]</b>			
	PE2 (lb/qtr)	PE1 (lb/qtr)	QNEC (lb/qtr)
NO <sub>x</sub>	0	0	0
SO <sub>x</sub>	0	0	0
PM <sub>10</sub>	0	0	0
CO	0	0	0
VOC	1,546	470	1,076

## VIII. Compliance

### Rule 2020 Exemptions

Per Rule 2020 Section 6.19 low emitting units (defined as an emissions unit with an uncontrolled emissions rate of each air contaminant less than or equal to two pounds per day), except those which belong to a source category listed in Sections 6.1 through 6.18, shall not require an Authority to Construct or Permit to Operate.

### Scrap Handling System

$$\begin{aligned} \text{Uncontrolled Daily PE} &= 20 \text{ tons-scrap/day} \times 0.0235 \text{ lb-PM}_{10}/\text{ton scrap} \\ &= 0.47 \text{ lb-PM}_{10}/\text{day} \end{aligned}$$

Per FYI 284, various manufacturing operations that process raw material and utilize aspirators, cyclones or fabric filtration devices as product or waste separation devices and not as PM<sub>10</sub> control devices do not require a permit if PM<sub>10</sub> emissions are negligible. In general, a permit is not required if the expected PM<sub>10</sub> emissions from the material separation operation is less than 2 lb/day. Examples of air/material separation systems that typically do not require permits include paper trimming collection/cleaning and baling operations.

Therefore, the scrap handling system is permit exempt.

### Rule 2201 New and Modified Stationary Source Review Rule

#### A. Best Available Control Technology (BACT)

##### 1. 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.

**a. New emissions units – PE > 2 lb/day**

As discussed in Section I above, there are no new emissions units associated with this project. Therefore BACT for new units with PE > 2 lb/day purposes is not triggered.

**b. Relocation of emissions units – PE > 2 lb/day**

As discussed in Section I above, there are no emissions units being relocated from one stationary source to another; therefore BACT is not triggered.

**c. Modification of emissions units – AIPE > 2 lb/day**

$$\text{AIPE} = \text{PE2} - \text{HAPE}$$

Where,

AIPE = Adjusted Increase in Permitted Emissions, (lb/day)

PE2 = Post-Project Potential to Emit, (lb/day)

HAPE = Historically Adjusted Potential to Emit, (lb/day)

$$\text{HAPE} = \text{PE1} \times (\text{EF2}/\text{EF1})$$

Where,

PE1 = The emissions unit's PE prior to modification or relocation, (lb/day)

EF2 = The emissions unit's permitted emission factor for the pollutant after modification or relocation. If EF2 is greater than EF1 then EF2/EF1 shall be set to 1

EF1 = The emissions unit's permitted emission factor for the pollutant before the modification or relocation

$$\text{AIPE} = \text{PE2} - (\text{PE1} * (\text{EF2} / \text{EF1}))$$

C-8609-2-1

There are no emission factor changes in this project. Therefore, EF2 / EF1 = 1.

<b>Adjusted Increase in Permitted Emissions</b>				
Permit Unit	PE2 (lb-VOC/day)	PE1 (lb-VOC/day)	AIPE (lb-VOC/day)	BACT Triggered?
C-8609-2-1	64.0	56.0	8.0	Yes

As demonstrated above, the AIPE is greater than 2 lb/day for VOC emissions. Therefore BACT is triggered.

C-3609-2-2, '4-4, '5-2, '6-2, '8-2, '9-2

There are no emission factor changes in this project. Therefore, EF2 / EF1 = 1.

<b>Adjusted Increase in Permitted Emissions</b>				
Permit Unit	PE2 (lb-VOC/day)	PE1 (lb-VOC/day)	AIPE (lb-VOC/day)	BACT Triggered?
C-3609-2-2	4.8	4.8	0.0	No
C-3609-4-4	4.8	4.8	0.0	No
C-3609-5-2	4.8	4.8	0.0	No
C-3609-6-2	4.4	4.4	0.0	No
C-3609-8-2	4.8	4.8	0.0	No
C-3609-9-2	4.4	4.4	0.0	No

As demonstrated above, the AIPE is not greater than 2 lb/day for VOC emissions. Therefore, BACT is not triggered.

**d. SB 288/Federal Major Modification**

As discussed in Sections VII.C.8 above, this project constitutes a Federal Major Modification. Therefore BACT is triggered for VOC emissions for all units with an increase in emissions.

**2. BACT Guideline**

C-8609-2-1

BACT Guideline 4.9.13, applies to the corrugated board manufacturing operation and starch based adhesive mixing system. [Corrugated Cardboard Manufacturing (Corrugator)] (See Appendix C)

C-3609-2-2, '-4-4, '-5-2, '-6-2, '-8-2, '-9-2

BACT Guidelines 4.7.4 and 4.7.15 apply to these units. [Flexographic Printing – Paper Carton Manufacturing - Printing and Adhesive Application] (See Appendix D)

BACT Guideline 4.7.4 applies to the flexographic printing of corrugated paper boxes using high-end graphics and BACT Guideline 4.7.15 applies to the flexographic printing of corrugated paper boxes using low-end graphics. To allow for the most flexibility in operation for the facility, it will be assumed that the printing will be of both low-end and high-end printing.

### **3. Top-Down BACT Analysis**

Per Permit Services Policies and Procedures for BACT, 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.

Pursuant to the attached Top-Down BACT Analysis (see Appendix C and D), BACT has been satisfied with the following:

C-8609-2-0

VOC: Steam conditioning of paper – 8 lb-VOC/10<sup>6</sup> ft<sup>2</sup>; Adhesives – 0.015 lb-VOC/gal (less water and exempt compounds)

C-3609-2-2, '-4-4, '-5-2, '-6-2, '-8-2, '-9-2

Guideline 4.7.4 – High-end Graphics:

VOC: Use of inks with a VOC content not exceeding 0.88 lb/gal (less water & exempt compounds) for high-end graphics printing.

And,

Guideline 4.7.15 – Low-end Graphics:

VOC: Use of inks with a VOC content (less water and exempt compounds) as indicated, or lower: 0.3 lb/gal and evaporative minimization methods, which include keeping all solvents and solvent-laden cloths/papers, not in active use, in closed containers

The applicant has proposed the use of flexographic inks which meet these requirements. The following conditions will be listed on the permits to ensure compliance:

- VOC content (less water and exempt compounds) of low-end flexographic inks shall not exceed 0.3 lb/gallon. [District Rules 2201 and 4607]

- VOC content (less water and exempt compounds) of high-end flexographic inks shall not exceed 0.88 lb/gallon. [District Rules 2201 and 4607]
- Permittee shall store or dispose of fresh or spent solvents, waste solvent cleaning materials, 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 Rules 2201 and 4607]

**B. Offsets**

**1. Offset Applicability**

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.

<b>Offset Determination (lb/year)</b>					
	<b>NO<sub>x</sub></b>	<b>SO<sub>x</sub></b>	<b>PM<sub>10</sub></b>	<b>CO</b>	<b>VOC</b>
SSPE2	3,170	3,620	1,722	8,138	28,860
Offset Thresholds	20,000	54,750	29,200	200,000	20,000
Offsets triggered?	No	No	No	No	Yes

**2. Quantity of Offsets Required**

As seen above, the SSPE2 is greater than the offset thresholds for VOC only. 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 less than the offset threshold levels before implementing the project being evaluated.

$$\text{Offsets Required (lb/year)} = [(\text{SSPE2} - \text{ROT} + \text{ICCE}) \times \text{DOR}]$$

Where,

SSPE2 = Post Project Stationary Source Potential to Emit

ROT = Respective Offset Threshold, for the respective pollutant

ICCE = Increase in Cargo Carrier Emissions

DOR = Distance Offset Ratio, determined pursuant to Section 4.8

Emergency equipment that is used exclusively as emergency standby equipment for electrical power generation or any other emergency equipment as approved by the

APCO that does not operate more than 200 hours per year of non-emergency purposes and is not used pursuant to voluntary arrangements with a power supplier to curtail power, is exempt from providing emission offsets. Therefore, permit unit C-3609-1-0 will be exempt from providing offsets and the emissions associated with this permit unit contributing to the SSPE2 should be removed prior to calculating actual offset amounts.

$$\text{Offsets Required (lb/year)} = [(\text{SSPE2} - \text{Emergency Equipment} - \text{ROT} + \text{ICCE}) \times \text{DOR}]$$

SSPE2 (VOC)	= 28,860 lb/year
C-3609-1-0 (VOC)	= 66 lb/year
Offset threshold (VOC)	= 20,000 lb/year
ICCE	= 0 lb/year

Assuming an offset ratio of 1.5:1, the amount of VOC ERCs that need to be withdrawn is:

$$\begin{aligned} \text{Offsets Required (lb/year)} &= [(28,860 - 66 - 20,000 + 0) \times 1.5] \\ &= 8,794 \times 1.5 \\ &= 13,191 \text{ lb VOC/year} \end{aligned}$$

Calculating the appropriate quarterly emissions to be offset is as follows:

$$\begin{aligned} \text{Quarterly offsets required (lb/qtr)} &= (13,191 \text{ lb VOC/year}) \div (4 \text{ quarters/year}) \\ &= 3,297.75 \text{ lb/qtr} \end{aligned}$$

As shown in the calculation above, the quarterly amount of offsets required for this project, when evenly distributed to each quarter, results in fractional pounds of offsets being required each quarter. Since offsets are required to be withdrawn as whole pounds, the quarterly amounts of offsets need to be adjusted to ensure the quarterly values sum to the total annual amount of offsets required.

To adjust the quarterly amount of offsets required, the fractional amount of offsets required in each quarter will be summed and redistributed to each quarter based on the number of days in each quarter. The redistribution is based on the Quarter 1 having the fewest days and the Quarters 3 and 4 having the most days. The redistribution method is summarized in the following table:

<b>Redistribution of Required Quarterly Offsets</b>				
(where X is the annual amount of offsets, and $X \div 4 = Y.z$ )				
<b>Value of z</b>	<b>Quarter 1</b>	<b>Quarter 2</b>	<b>Quarter 3</b>	<b>Quarter 4</b>
.0	Y	Y	Y	Y
.25	Y	Y	Y	Y+1
.5	Y	Y	Y+1	Y+1
.75	Y	Y+1	Y+1	Y+1

Therefore the appropriate quarterly emissions to be offset are as follows:

<u>1<sup>st</sup> Quarter</u>	<u>2<sup>nd</sup> Quarter</u>	<u>3<sup>rd</sup> Quarter</u>	<u>4<sup>th</sup> Quarter</u>	<u>Total Annual</u>
3,297	3,298	3,298	3,298	13,191

The applicant has stated that the facility plans to use a portion of ERC certificate S-4675-1 to offset the increases in VOC emissions associated with this project. The above certificate will be split and the facility has entered into a binding contract to purchase the following amounts:

	<u>1<sup>st</sup> Quarter</u>	<u>2<sup>nd</sup> Quarter</u>	<u>3<sup>rd</sup> Quarter</u>	<u>4<sup>th</sup> Quarter</u>
Split of ERC # S-4675-1	3,298	3,298	3,298	3,298

As seen above, the facility has sufficient credits to fully offset the quarterly VOC emissions increases associated with this project.

**Proposed Rule 2201 (offset) Conditions:**

- {GC# 4447 - edited} Prior to operating equipment under this Authority to Construct (ATC), permittee shall surrender VOC emission reduction credits for the following quantity of emissions: 1st quarter – 3,297 lb, 2nd quarter – 3,298 lb, 3rd quarter – 3,298 lb, and fourth quarter – 3,298 lb. These amounts include the applicable offset ratio specified in Rule 2201 Section 4.8 (as amended 2/18/16) for the ERC specified below. [District Rule 2201]
- {GC# 1983} ERC Certificate Number S-4675-1 (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]

**C. Public Notification**

**1. Applicability**

Public noticing is required for:

- a. New Major Sources, Federal Major Modifications, and SB 288 Major Modifications,
- b. Any new emissions unit with a Potential to Emit greater than 100 pounds during any one day for any one pollutant,
- c. Any project which results in the offset thresholds being surpassed, and/or
- d. Any project with an SSIPE of greater than 20,000 lb/year for any pollutant.

**a. New Major Sources, Federal Major Modifications, and SB 288 Major Modifications**

New Major Sources are new facilities, which are also Major Sources. Since this is not a new facility, public noticing is not required for this project for New Major Source purposes.

As demonstrated in Sections VII.C.8, this project is a Federal Major Modification. Therefore, public noticing for Federal Major Modification purposes is required.

**b. PE > 100 lb/day**

Applications which include a new emissions unit with a PE greater than 100 pounds during any one day for any pollutant will trigger public noticing requirements. There are no new emissions units associated with this project. Therefore public noticing is not required for this project for PE > 100 lb/day.

**c. Offset Threshold**

The following table compares the SSPE1 with the SSPE2 in order to determine if any offset thresholds have been surpassed with this project.

<b>Offset Thresholds</b>				
<b>Pollutant</b>	<b>SSPE1 (lb/year)</b>	<b>SSPE2 (lb/year)</b>	<b>Offset Threshold</b>	<b>Public Notice Required?</b>
NO <sub>x</sub>	3,170	3,170	20,000 lb/year	No
SO <sub>x</sub>	3,620	3,620	54,750 lb/year	No
PM <sub>10</sub>	1,722	1,722	29,200 lb/year	No
CO	8,138	8,138	200,000 lb/year	No
VOC	18,957	28,860	20,000 lb/year	Yes

As detailed above, offset thresholds were surpassed for VOC with this project; therefore public noticing is required for offset purposes.

**d. SSIPE > 20,000 lb/year**

Public notification is required for any permitting action that results in a SSIPE of more than 20,000 lb/year of any affected pollutant. According to District policy, the SSIPE = SSPE2 – SSPE1. The SSIPE is compared to the SSIPE Public Notice thresholds in the following table.



<b>SSIPE Public Notice Thresholds</b>					
<b>Pollutant</b>	<b>SSPE2 (lb/year)</b>	<b>SSPE1 (lb/year)</b>	<b>SSIPE (lb/year)</b>	<b>SSIPE Public Notice Threshold</b>	<b>Public Notice Required?</b>
NO <sub>x</sub>	3,170	3,170	0	20,000 lb/year	No
SO <sub>x</sub>	3,620	3,620	0	20,000 lb/year	No
PM <sub>10</sub>	1,722	1,722	0	20,000 lb/year	No
CO	8,138	8,138	0	20,000 lb/year	No
VOC	28,860	18,957	9,903	20,000 lb/year	No

As demonstrated above, the SSIPEs for all pollutants were less than 20,000 lb/year; therefore public noticing for SSIPE purposes is not required.

## 2. Public Notice Action

As discussed above, public noticing is required for this project for being a Federal Major Modification and for VOC emissions exceeding the offset threshold. Therefore, public notice documents will be submitted to the California Air Resources Board (CARB) and a public notice will be published in a local newspaper of general circulation prior to the issuance of the ATC for this equipment.

## D. 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 permit 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.

### Proposed Rule 2201 (DEL) Conditions

#### C-8609-2

- VOC emissions from the corrugator shall not exceed 8 pounds per million square feet of corrugated boards produced. [District Rule 2201]
- The quantity of corrugated board processed shall not exceed any of the following: 8,000,000 square feet in any one day and 2,200,000,000 square feet in any one year based on a 12 month rolling average. [District Rule 2201]
- Adhesives used shall not contain any VOC. [District Rule 2201]

#### C-3609-2, '-4, '-5, '-8

- VOC emissions from the use of inks and adhesives shall not exceed 4.8 pounds in any one day. [District Rule 2201]

- VOC content of adhesive products used in this operation shall not exceed 3.74 g/L (equivalent to 0.0312 lb/gal). [District Rules 2201, 4607 and 4653]
- VOC content (less water and exempt compounds) of low-end flexographic inks shall not exceed 0.3 lb/gallon. [District Rules 2201 and 4607]
- VOC content (less water and exempt compounds) of high-end flexographic inks shall not exceed 0.88 lb/gallon. [District Rules 2201 and 4607]

#### C-3609-6, '-9

- VOC emissions from the use of inks shall not exceed 4.4 pounds in any one day. [District Rule 2201]
- VOC content (less water and exempt compounds) of low-end flexographic inks shall not exceed 0.3 lb/gallon. [District Rules 2201 and 4607]
- VOC content (less water and exempt compounds) of high-end flexographic inks shall not exceed 0.88 lb/gallon. [District Rules 2201 and 4607]

#### C-3609-2-2, '-4-4, '-5-2, '-6-2, '-8-2, '-9-2

Additionally, since the units are a part of a SLC, the following condition will be included to limit annual emissions:

- Combined VOC emissions from the equipment listed in permits C-3609-2, '4, '5, '6, '8, and '9 shall not exceed 6,184 pounds in any one year, based on a 12 month rolling average. [District Rule 2201]

### **E. Compliance Assurance**

#### **1. Source Testing**

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

#### **2. Monitoring**

No monitoring is required to demonstrate compliance with Rule 2201.

#### **3. Recordkeeping**

Recordkeeping is required to demonstrate compliance with the offset, public notification and daily emission limit requirements of Rule 2201. The following conditions will be listed on the permits to ensure compliance:

#### C-8609-2-1

- The permittee shall keep records of the date and total amount of the corrugated boards produced in million square feet. [District Rule 2201]
- All records shall be retained on-site for a minimum of five years and shall be made

available to the District upon request. [District Rule 1070]

C-3609-2-2, '4-4, '5-2, '6-2, '8-2, '9-2

- For each ink, adhesive, and solvent used in this operation, the permittee shall record on a monthly basis the product/material name, material type (e.g. ink), amount used (gallons), VOC content, less water and exempt compounds (lb-VOC/gal), and material VOC content (lb-VOC/gal). [District Rules 2201 and 4607]
- Permittee shall maintain a record of the average daily VOC emissions to be calculated from monthly records of inks, adhesives, solvents and cleaning materials used in a calendar month, and the number days this unit is operated in a calendar month. [District Rule 2201]
- Permittee shall maintain a record of the combined annual VOC emissions from permits C-3609-2, '4, '5, '6, '8, and '9, updated monthly. [District Rule 2201]
- All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070, 2201 and 4607]

#### **4. Reporting**

No reporting is required to demonstrate compliance with Rule 2201.

#### **F. Ambient Air Quality Analysis (AAQA)**

Section 4.14.1 of this Rule requires that an ambient air quality analysis (AAQA) be conducted for the purpose of determining whether a new or modified Stationary Source will cause or make worse a violation of an air quality standard. However, since this project involves only VOC and no ambient air quality standard exists for VOC, an AAQA is not required for this project.

#### **G. Compliance Certification**

Section 4.15.2 of this Rule requires the owner of a new Major Source or a source undergoing a Title I 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 VIII above, this facility is a new major source and this project constitutes a Title I modification; therefore, this requirement is applicable. SCC's and CCS's compliance certification is included in Appendix B.

#### **H. Alternate Siting Analysis**

The current project occurs at an existing facility. The applicant does not propose to install any new equipment, only an increase in production/throughput.

Since the project will not install any new equipment, 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 on a much greater scale, and would therefore result in a much greater impact.

#### **Rule 2410 Prevention of Significant Deterioration**

As shown in Section VII. C. 9. above, this project does not result in a new PSD major source or PSD major modification. No further discussion is required.

#### **Rule 2520 Federally Mandated Operating Permits**

As discussed above, this facility is a major source. Pursuant to Rule 2520 and as required by permit condition, the facility will have up to 12 months from the date of ATC issuance to either submit a Title V Application or comply with District Rule 2530 *Federally Enforceable Potential to Emit*.

Therefore, the following condition will be included on the ATCs:

- Permittee shall submit an application to comply with SJVUAPCD District Rule 2520 - Federally Mandated Operating Permits within 12 months of implementing this ATC. [District Rule 2520]

#### **Rule 4001 New Source Performance Standards (NSPS)**

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.

#### **40 CFR Part 60 Subpart QQ – Standards of Performance for the Graphic Arts Industry: Publication Rotogravure Printing**

The affected facility to which the provisions of this subpart apply is each publication rotogravure printing press. This subpart defines rotogravure printing press as any device designed to print one color ink on one side of a continuous web or substrate using a gravure cylinder. The printing presses in this project are not a rotogravure printing press as defined in this subpart.

Therefore, the requirements of this subpart are not applicable to this project.

#### **Rule 4002 National Emission Standards for Hazardous Air Pollutants (NESHAPs)**

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.

The requirements of 40 CFR Part 63 Subpart KK – *NESHAPs for the Printing and Publishing Industry*, are applicable to new and existing facilities that are a major source of hazardous air pollutants (HAP), as defined in 40 CFR 63.2, at which publication rotogravure, product and

packaging rotogravure, or wide-web flexographic printing presses are operated. This facility is not a major source of hazardous air pollutant emissions; therefore, the provisions of this subpart are not applicable.

#### **Rule 4101 Visible Emissions**

Per Section 5.0, no person shall discharge into the atmosphere emissions of any air contaminant aggregating more than 3 minutes in any hour which is as dark as or darker than Ringelmann 1 (or 20% opacity).

The following condition will ensure compliance with this rule:

- 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]

Compliance with the above requirement is expected.

#### **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. Therefore, compliance with this rule is expected.

The following condition will ensure compliance with this rule:

- 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 or equal to one. According to the Technical Services Memo for this project (Appendix E), the total facility prioritization score including this project was less than or equal to one. Therefore, no future analysis is required to determine the impact from this project and 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 10 in a million). As outlined by the HRA Summary in

Appendix E of this report, the emissions increases for this project was determined to be less than significant.

### **Rule 4607 Graphic Arts**

C-3609-2-2, '-4-4, '-5-2, '-6-2, '-8-2, '-9-2

The purpose of this rule is to limit VOC emissions from graphic arts printing operations. This rule is applicable to any graphic arts printing operation, to any paper or fabric coating operation, to the organic solvent cleaning, and to the storage and disposal of solvents and waste solvent materials associated with such operations as defined in Section 3.0 of this rule.

Rule 4607 defines graphic arts printing operations as “those operations employing gravure, *flexography*, letterpress, lithography, screen, or any coating or laminating process to produce published products and *packages*. Organic solvent cleaning operations performed in order to produce published products and packages are considered to be part of graphic arts printing operations.”

Since the units in this project employ a flexographic method of printing, the units are subject to this rule.

#### Section 5.1 Graphic Arts Printing Operation

Section 5.1 states an operator performing a graphic arts printing operation, not subject to Section 5.2, 5.3, 5.4, or 5.5, shall not use graphic arts materials in excess of the VOC content limits in Table 1 and Table 2, in accordance with the corresponding effective date.

<b>Table 1 VOC Content Limits for Inks, Coatings, and Adhesives</b>	
<b>Material</b>	<b>Grams of VOC per liter (lb/gal), less water and exempt compounds</b>
	Effective 1/1/10
Flexographic Ink on Porous Substrates	225 (1.88)
All Other Inks	300 (2.5)
Coating	300 (2.5)
Adhesives	150 (1.25)
Web Splicing Adhesives	150 (1.25)

The following conditions will be listed on the permits to ensure compliance with the VOC content limits of Table 1:

- 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]

Section 5.2 Flexographic Specialty Ink

Section 5.2 states an operator using a flexographic printing operation shall not use a specialty ink in excess of the VOC content limit in Table 3, and shall not use more than 2 gallons of specialty inks in a calendar day and 120 gallons of specialty inks in a calendar year.

Although the proposed corrugated paper box manufacturing machine is a flexographic printer, it does not use “specialty” inks as defined in Rule 4607; therefore, the VOC content limits of Section 5.2 are not applicable.

Section 5.4 Screen Printing Operations

This section applies to screen printing operations. The corrugated paper box manufacturing machine has a flexographic printer; therefore, Section 5.4 does not apply.

Section 5.5 Paper or Fabric Coating Operation

The corrugated paper box manufacturing machine in this project does not perform paper or fabric coating as defined in the rule; therefore, the VOC content limits of this section do not apply.

Section 5.6 Approved Emission Control System

The corrugated paper box manufacturing machine is not equipped with an emission control

system; therefore, the requirements of Section 5.6 do not apply.

### Section 5.7 Coating Application Equipment

This section requires all coating application equipment to be operated according to the manufacturer's specifications, and only the following application methods may be used: flow coater, roll coater, dip coater, foam coater, die coater, hand application methods, or high volume low pressure (HVLP) spray for air dried coatings.

The applicant did not propose a coating-type operation<sup>1</sup> as defined in this rule; therefore, this section does not apply to the corrugated paper box manufacturing machine.

### Section 5.8 Organic Solvent Cleaning

Section 5.8 states an owner or operator shall not use organic solvents for cleaning operations that exceed the VOC content limits specified in the Table 7. The facility will use solvents for cleaning based upon the flexographic specialty ink printing.

<b>Table 7</b>	
<b>Cleaning Solvent Use</b>	<b>VOC Content Limit grams/liter (lb/gal)</b>
A. Cleaning of Ink Application Equipment 1. Specialty Flexographic Printing	100 (0.83)

Section 5.8.3 requires cleaning activities that use solvents with a VOC content greater than 25 g/l (0.21 lb/gallon) 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.

<sup>1</sup> Rule 4607 defines "coating" as the application of a uniform layer of material across the entire width of a substrate. Those machines which have both coating and printing units should be considered as performing a printing operation.



The following condition will be listed on the permits to ensure compliance:

- 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]

Section 5.8.4 prohibits the atomization into the open air of solvents with a VOC content greater than 25 g/l (0.21 lb/gallon) used for cleaning activities unless such solvents are vented to a VOC emission control system that complies with Section 5.6. This provision shall not apply to printing operations where the roller or blanket wash is applied automatically and the cleaning of nozzle tips of automated spray equipment systems, except for robotic systems, and cleaning with spray bottles or containers described in Section 5.8.3.2.

The following condition will be listed on the permits to ensure compliance:

- 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. 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 non-propellant-induced, hand-held spray bottles. [District Rule 4607]

Section 5.8.5 prohibits the use of solvents with a VOC content greater than 25 g/l (0.21 lb/gallon) to clean spray equipment used for the application of coatings, adhesives, or ink, unless an enclosed system or equipment that is proven to be equally effective at controlling emissions is used for cleaning. If an enclosed system is used, it must totally enclose spray guns, cups, nozzles, bowls, and other parts during washing, rinsing and draining procedures, and it must be used according to the manufacturer's recommendations and must be closed when not in use.

The following condition will be listed on the permits to ensure compliance:

- 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 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 storage or disposal of fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc., coatings, adhesives, catalysts, thinners, and ink in closed, non-absorbent and non-leaking containers. The containers must 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 permits to ensure compliance:

- Permittee shall store or dispose of fresh or spent solvents, waste solvent cleaning materials, adhesives, 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]

## Section 6.0 Administrative Requirements

### Section 6.1 Recordkeeping

Any person subject to the provisions of this rule including stationary sources exempt pursuant to Section 4.1, shall comply with the following requirements:

Section 6.1.1 requires the permittee to maintain a current file of coatings, inks, adhesives, fountain solutions, wash primers, and solvents in use and in storage. The file shall include a material data sheet or product data sheet showing the material name, manufacturer's name, VOC content as applied, specific mixing instruction, density, and if required, composite vapor pressure.

The following condition will be listed on the permits to ensure compliance:

- 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]

Section 6.1.2 states that if the facility only uses materials that are compliant with the VOC content limits from Sections 5.1, 5.2, 5.3, 5.4, or 5.5, then (section 6.1.2.1) the facility shall record, on a monthly basis, the type and amount of all inks used according to one of the following methods:

- 6.1.2.1.1 Group the quantity of all inks used and identify the maximum VOC content and use the minimum density of 1010 gm/liter (8.44 lb/gal); or

- 6.1.2.1.2 Report process inks and pantone inks separately and use specific VOC content and density value for each process ink, and the highest VOC content and the minimum density of 1010 gm/liter (8.44 lb/gal) for pantone inks; or
- 6.1.2.1.3 Report process inks and pantone inks separately and use the maximum VOC content and minimum density value for both process and pantone inks, or use the density of 1010 gm/liter (8.44 lb/gal) for pantone inks; or
- 6.1.2.1.4 Itemize each ink and pantone ink and use the specific VOC content and density value for each.

In addition, Section 6.1.2.2 requires the facility to record, on a monthly basis, the type and amount of each coating, adhesive, fountain solution, wash primer, and solvent used.

Since the facility is not making use of the 400 lb-VOC/month exemption under Section 4.1 of this rule, and the Rule 2201 recordkeeping requirements require a daily record of the printing materials used, the following current, more stringent Rule 2201-based condition on the permits will ensure compliance:

- For each ink, adhesive, and solvent 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 (lb-VOC/gal), material VOC content (lb-VOC/gal), and the VOC emissions in pounds (material VOC content in lb-VOC/gal multiplied by the usage in gallons). [District Rules 2201 and 4607]

Section 6.1.4 applies to the use of flexographic specialty inks. The applicant has not proposed any flexographic specialty inks; therefore, this section is not applicable.

Section 6.1.5 applies to graphic arts operations served by a VOC control device. None of the printers in this project are equipped with a VOC control device; therefore, this section is not applicable.

Section 6.1 requires the facility to keep records for five years. The following condition will be listed on the permits to ensure compliance:

- 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]

Section 6.2, Compliance Statement Requirement, applies to the manufacturers of graphic arts materials. This facility is not a manufacturer of graphic arts materials; therefore, this section does not apply.

Section 6.3 Determination of VOC Emissions from Inks Used in a Lithographic Printing Operation.

This section is not applicable to flexographic-type printing operations.

Section 6.4 lists the approved test methods. No testing is required; therefore, none of the test methods will be listed on the permit.

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

### **Rule 4653 Adhesives**

The purpose of this rule is to reduce emissions of volatile organic compounds (VOCs) from the application of adhesive products, sealant products, and associated solvent cleaning operations. This rule is applicable to any person who supplies, sells, offers for sale, or applies any adhesive product, sealant product, or associated solvent, used within the District.

#### C-8609-2-1

The facility uses adhesive composed of starch, borax, caustic soda, and water and contains no VOC.

Therefore, the equipment in this project is exempt from the requirements of this rule.

#### C-3609-2-2, '-4-4, '-5-2, '-6-2, '-8-2, '-9-2

Pursuant to Section 4.1.2, the provisions of this rule shall not apply to the use of adhesive products or sealant products containing less than 20 grams VOC per liter. The proposed adhesive VOC content is 0.0312 lb/gal, equivalent to 3.74 g/L, which is less than 20 g/L; therefore, the proposed operations are not subject to the provisions of this rule. The following condition will be listed on each permit.

- VOC content of adhesive products used in this operation shall not exceed 3.74 g/L (equivalent to 0.0312 lb/gal). [District Rules 2201, 4607 and 4653]

### **Rule 4661 Organic Solvents**

The purpose of this rule is to limit the emissions of volatile organic compounds (VOCs) from the use of organic solvents and the provisions of this rule shall apply to any source operation that uses organic solvents unless the source is exempted under Section 4.0.

#### C-3609-2-2, '-4-4, '-5-2, '-6-2, '-8-2, '-9-2

Pursuant to Section 4.2.7, the provisions of this rule shall not apply to any source operation that is subject to or specifically exempted by Rule 4607 (Graphic Arts). Since the proposed operation is subject to Rule 4607, the operation is exempt from the provisions of this rule. No further discussion is required.

### **California Health & Safety Code 42301.6 (School Notice)**

The District has verified that the equipment is located within 1,000 feet of the outer boundary of a K-12 school; however, it is located inside of a building.

The majority of the building vents and doors are not located within 1,000 feet of the outer

boundary of a K-12 school. The building does have one exhaust vent, one roof intake hood, and two emergency exit doors within 1,000 feet of the outer boundary of a K-12 school. The exhaust vent has been permanently closed. The roof intake hood has backdraft protection and the emergency doors will remain closed during all operating hours. The following conditions will ensure compliance with these requirements:

- The building exhaust vent located within 1,000 feet of the outer boundary of a K-12 school shall be permanently closed. [CH&SC 42301.6]
- The building emergency doors located within 1,000 feet of the outer boundary of a K-12 school shall remain closed during all operating hours. [CH&SC 42301.6]
- The building roof intake hood located within 1,000 feet of the outer boundary of a K-12 school shall be operated with backdraft protection during all operating hours. [CH&SC 42301.6]

Therefore, the public notification requirement of California Health and Safety Code 42301.6 is not applicable to this project.

### **California Environmental Quality Act (CEQA)**

The California Environmental Quality Act (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 San Joaquin Valley Unified Air Pollution Control District (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.
- 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**

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 is the Lead Agency for this project because there is no other agency with broader statutory authority over this project. The District performed an Engineering Evaluation (this document) for the proposed project and determined that the activity will occur at an existing

facility and the project involves negligible expansion of the existing use. Furthermore, the District determined that the activity will not have a significant effect on the environment. The District finds that the activity is categorically exempt from the provisions of CEQA pursuant to CEQA Guideline § 15031 (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)).

**IX. Recommendation**

Compliance with all applicable rules and regulations is expected. Pending a successful NSR Public Noticing period, issue ATCs C-8909-2-1 and C-3609-2-2, '-4-4, '-5-2, '-6-2, '-8-2, '-9-2 subject to the permit conditions on the attached draft ATC permits in Appendix F.

**X. Billing Information**

<b>Annual Permit Fees</b>			
Permit Number	Fee Schedule	Fee Description	Annual Fee
C-8609-2-1	3020-01-H	2400 HP	\$1,080
C-3609-2-2	3020-01-C	98.75 HP	\$207
C-3609-4-4	3020-01-C	98.75 HP	\$207
C-3609-5-2	3020-01-C	98.75 HP	\$207
C-3609-6-2	3020-01-C	98.75 HP	\$207
C-3609-8-2	3020-01-C	50 HP	\$207
C-3609-9-2	3020-01-C	50 HP	\$207

**Appendices**

- A: Current Permits to Operate and Authorities to Construct to be Implemented
- B: Statewide Compliance Certification
- C: BACT Guideline 4.9.13 and Top Down BACT Analysis
- D: BACT Guideline 4.7.4 and 4.7.15 and Top Down BACT Analysis
- E: Health Risk Assessment Analysis
- F: Draft Authority to Construct Permits

## **Appendix A**

### **Current Permits to Operate and Authorities to Construct to be Implemented**

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-8609-2-0

**EXPIRATION DATE:** 10/31/2018

**EQUIPMENT DESCRIPTION:**

CORRUGATED BOARD MANUFACTURING OPERATION AND A STARCH-BASED ADHESIVE MIXING SYSTEM WITH PERMIT EXEMPT SCRAP HANDLING SYSTEM SERVED BY A BAGHOUSE (LOW EMITTING UNIT)

## PERMIT UNIT REQUIREMENTS

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1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
3. VOC emissions from the corrugator shall not exceed 8 pounds per million square feet of corrugated boards produced. [District Rule 2201]
4. The quantity of corrugated board processed shall not exceed any of the following: 7,000,000 square feet in any one day or 1,500,000,000 square feet in any one year. [District Rule 2201]
5. Adhesives used shall not contain any VOC. [District Rule 2201]
6. The permittee shall keep records of the date and total amount of the corrugated boards produced in million square feet. [District Rule 2201]
7. All records shall be retained on-site for a minimum of five years and shall be made available to the District upon request. [District Rule 1070]
8. Facilities C-8609 (Central California Sheets, LLC) and C-3609 (Sacramento Container Corporation) are the same Stationary Source. [District Rule 2010]

These terms and conditions are part of the Facility-wide Permit to Operate.





## AUTHORITY TO CONSTRUCT

**PERMIT NO:** C-3609-2-1

**ISSUANCE DATE:** 03/24/2015

**LEGAL OWNER OR OPERATOR:** SACRAMENTO CONTAINER CORPORATION

**MAILING ADDRESS:** 4841 URBANI AVE  
MCCLELLAN, CA 95652

**LOCATION:** 909 UNION ST  
KINGSBURG, CA 93631-0007

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF MARTIN MODEL 924 FLEXO-PRINTER/FOLDER/GLUER CORRUGATED PAPER BOX MANUFACTURING MACHINE WITH A PERMIT EXEMPT DIE CUTTER SERVED BY A SCRAP COLLECTION SYSTEM WITH A BAGHOUSE (UNCONTROLLED PM10 EMISSIONS LESS THAN 2.0 LB/DAY): ESTABLISH SPECIFIC LIMITING CONDITION FOR VOC FOR THE EQUIPMENT LISTED IN PERMIT UNITS C-3609-2, '4, '5, '6, '8, AND '9

### CONDITIONS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
3. 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]
4. VOC emissions from the use of inks and adhesives shall not exceed 4.8 pounds in any one day. [District Rule 2201]
5. Combined VOC emissions from the equipment listed in permits C-3609-2, '4, '5, '6, '8, and '9 shall not exceed 1,881 pounds in any one year. [District Rule 2201]
6. VOC content of adhesive products used in this operation shall not exceed 3.74 g/L (equivalent to 0.0312 lb/gal). [District Rules 2201, 4607 and 4653]
7. VOC content (less water and exempt compounds) of low-end flexographic inks shall not exceed 0.3 lb/gallon. [District Rules 2201 and 4607]
8. VOC content (less water and exempt compounds) of high-end flexographic inks shall not exceed 0.88 lb/gallon. [District Rules 2201 and 4607]

CONDITIONS CONTINUE ON NEXT PAGE

YOU **MUST** NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 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

**COPY**

Arnaud Marjollet, Director of Permit Services

C-3609-2-1 Apr 12 2015 3:21PM -- GARCIA/J Joint Inspection NOT Required

9. VOC content of cleaning solvents shall not exceed any of the following limits: product cleaning during manufacturing process or surface preparation for ink or adhesive application: 25 g/l (0.21 lb/gal); repair and maintenance cleaning: 25 g/l (0.21 lb/gal); cleaning of ink application equipment: 25 g/l (0.21 lb/gal). [District Rule 4607]
10. 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]
11. 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. 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 non-propellant-induced, hand-held spray bottles. [District Rule 4607]
12. 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]
13. 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 Rules 2201 and 4607]
14. Permittee shall maintain a current file of coatings, inks, adhesives, fountain solutions, wash primers, and solvents in use and in storage. The file shall include material safety data sheet (MSDS) or product data sheet showing the material name, manufacturer's name, VOC content as applied (or sufficient composition data to calculate this value), material VOC content (or VOC content "as packaged" from manufacturer), mixing instruction, and density. [District Rule 4607]
15. For each ink, adhesive, and solvent used in this operation, the permittee shall record on a monthly basis the product/material name, material type (e.g. ink), amount used (gallons), VOC content, less water and exempt compounds (lb-VOC/gal), and material VOC content (lb-VOC/gal). [District Rules 2201 and 4607]
16. Permittee shall maintain a record of the average daily VOC emissions to be calculated from monthly records of inks, adhesives, solvents and cleaning materials used in a calendar month, and the number days this unit is operated in a calendar month. [District Rule 2201]
17. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070, 2201, and 4607]
18. Facilities C-3609 (Sacramento Container Corporation) and C-8609 (Central California Sheets, LLC) are the same Stationary Source. [District Rule 2010]

## AUTHORITY TO CONSTRUCT

**PERMIT NO:** C-3609-4-1

**ISSUANCE DATE:** 03/24/2015

**LEGAL OWNER OR OPERATOR:** SACRAMENTO CONTAINER CORPORATION

**MAILING ADDRESS:** 4841 URBANI AVE  
MCCLELLAN, CA 95652

**LOCATION:** 909 UNION ST  
KINGSBURG, CA 93631-0007

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF MARTIN MODEL 924 FLEXO-PRINTER/FOLDER/GLUER CORRUGATED PAPER BOX MANUFACTURING MACHINE WITH A PERMIT EXEMPT DIE CUTTER SERVED BY A SCRAP COLLECTION SYSTEM WITH A BAGHOUSE (UNCONTROLLED PM10 EMISSIONS LESS THAN 2.0 LB/DAY): ESTABLISH SPECIFIC LIMITING CONDITION FOR VOC FOR THE EQUIPMENT LISTED IN PERMIT UNITS C-3609-2, '4, '5, '6, '8, AND '9

### CONDITIONS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
3. 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]
4. VOC emissions from the use of inks and adhesives shall not exceed 4.8 pounds in any one day. [District Rule 2201]
5. Combined VOC emissions from the equipment listed in permits C-3609-2, '4, '5, '6, '8, and '9 shall not exceed 1,881 pounds in any one year. [District Rule 2201]
6. VOC content of adhesive products used in this operation shall not exceed 3.74 g/L (equivalent to 0.0312 lb/gal). [District Rules 2201, 4607 and 4653]
7. VOC content (less water and exempt compounds) of low-end flexographic inks shall not exceed 0.3 lb/gallon. [District Rules 2201 and 4607]
8. VOC content (less water and exempt compounds) of high-end flexographic inks shall not exceed 0.88 lb/gallon. [District Rules 2201 and 4607]

CONDITIONS CONTINUE ON NEXT PAGE

**YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 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

9. VOC content of cleaning solvents shall not exceed any of the following limits: product cleaning during manufacturing process or surface preparation for ink or adhesive application: 25 g/l (0.21 lb/gal); repair and maintenance cleaning: 25 g/l (0.21 lb/gal); cleaning of ink application equipment: 25 g/l (0.21 lb/gal). [District Rule 4607]
10. 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]
11. 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. 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 non-propellant-induced, hand-held spray bottles. [District Rule 4607]
12. 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]
13. 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 Rules 2201 and 4607]
14. Permittee shall maintain a current file of coatings, inks, adhesives, fountain solutions, wash primers, and solvents in use and in storage. The file shall include material safety data sheet (MSDS) or product data sheet showing the material name, manufacturer's name, VOC content as applied (or sufficient composition data to calculate this value), material VOC content (or VOC content "as packaged" from manufacturer), mixing instruction, and density. [District Rule 4607]
15. For each ink, adhesive, and solvent used in this operation, the permittee shall record on a monthly basis the product/material name, material type (e.g. ink), amount used (gallons), VOC content, less water and exempt compounds (lb-VOC/gal), and material VOC content (lb-VOC/gal). [District Rules 2201 and 4607]
16. Permittee shall maintain a record of the average daily VOC emissions to be calculated from monthly records of inks, adhesives, solvents and cleaning materials used in a calendar month, and the number days this unit is operated in a calendar month. [District Rule 2201]
17. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070, 2201, and 4607]
18. Facilities C-3609 (Sacramento Container Corporation) and C-8609 (Central California Sheets, LLC) are the same Stationary Source. [District Rule 2010]



## AUTHORITY TO CONSTRUCT

**PERMIT NO:** C-3609-5-1

**ISSUANCE DATE:** 03/24/2015

**LEGAL OWNER OR OPERATOR:** SACRAMENTO CONTAINER CORPORATION

**MAILING ADDRESS:** 4841 URBANI AVE  
MCCLELLAN, CA 95652

**LOCATION:** 909 UNION ST  
KINGSBURG, CA 93631-0007

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF WARD MODEL 4-C FLEXO-PRINTER/FOLDER/GLUER CORRUGATED PAPER BOX MANUFACTURING MACHINE WITH A PERMIT EXEMPT DIE CUTTER SERVED BY A SCRAP COLLECTION SYSTEM WITH A BAGHOUSE (UNCONTROLLED PM10 EMISSIONS LESS THAN 2.0 LB/DAY): ESTABLISH SPECIFIC LIMITING CONDITION FOR VOC FOR THE EQUIPMENT LISTED IN PERMIT UNITS C-3609-2, '4, '5, '6, '8, AND '9

### CONDITIONS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
3. 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]
4. VOC emissions from the use of inks and adhesives shall not exceed 4.8 pounds in any one day. [District Rule 2201]
5. Combined VOC emissions from the equipment listed in permits C-3609-2, '4, '5, '6, '8, and '9 shall not exceed 1,881 pounds in any one year. [District Rule 2201]
6. VOC content of adhesive products used in this operation shall not exceed 3.74 g/L (equivalent to 0.0312 lb/gal). [District Rules 2201, 4607 and 4653]
7. VOC content (less water and exempt compounds) of low-end flexographic inks shall not exceed 0.3 lb/gallon. [District Rules 2201 and 4607]
8. VOC content (less water and exempt compounds) of high-end flexographic inks shall not exceed 0.88 lb/gallon. [District Rules 2201 and 4607]

CONDITIONS CONTINUE ON NEXT PAGE

**YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 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

**COPY**

Arnaud Marjollet, Director of Permit Services

C-3609-5-1: Apr 12 2016 3:21PM -- GARCIAJ . Joint Inspection NOT Required

9. VOC content of cleaning solvents shall not exceed any of the following limits: product cleaning during manufacturing process or surface preparation for ink or adhesive application: 25 g/l (0.21 lb/gal); repair and maintenance cleaning: 25 g/l (0.21 lb/gal); cleaning of ink application equipment: 25 g/l (0.21 lb/gal). [District Rule 4607]
10. 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]
11. 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. 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 non-propellant-induced, hand-held spray bottles. [District Rule 4607]
12. 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]
13. 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 Rules 2201 and 4607]
14. Permittee shall maintain a current file of coatings, inks, adhesives, fountain solutions, wash primers, and solvents in use and in storage. The file shall include material safety data sheet (MSDS) or product data sheet showing the material name, manufacturer's name, VOC content as applied (or sufficient composition data to calculate this value), material VOC content (or VOC content "as packaged" from manufacturer), mixing instruction, and density. [District Rule 4607]
15. For each ink, adhesive, and solvent used in this operation, the permittee shall record on a monthly basis the product/material name, material type (e.g. ink), amount used (gallons), VOC content, less water and exempt compounds (lb-VOC/gal), and material VOC content (lb-VOC/gal). [District Rules 2201 and 4607]
16. Permittee shall maintain a record of the average daily VOC emissions to be calculated from monthly records of inks, adhesives, solvents and cleaning materials used in a calendar month, and the number days this unit is operated in a calendar month. [District Rule 2201]
17. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070, 2201, and 4607]
18. Facilities C-3609 (Sacramento Container Corporation) and C-8609 (Central California Sheets, LLC) are the same Stationary Source. [District Rule 2010]



## AUTHORITY TO CONSTRUCT

**PERMIT NO:** C-3609-6-1

**ISSUANCE DATE:** 03/24/2015

**LEGAL OWNER OR OPERATOR:** SACRAMENTO CONTAINER CORPORATION

**MAILING ADDRESS:** 4841 URBANI AVE  
MCCLELLAN, CA 95652

**LOCATION:** 909 UNION ST  
KINGSBURG, CA 93631-0007

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF WARD MODEL # 16000 SV (S/N 16331) 4-COLOR FLEXOGRAPHIC PRINTER CORRUGATED PAPER BOX MACHINE WITH A PERMIT EXEMPT ROTARY DIE CUTTER SERVED BY A SCRAP COLLECTION SYSTEM WITH A BAGHOUSE (UNCONTROLLED PM10 EMISSIONS LESS THAN 2.0 LB/DAY): ESTABLISH SPECIFIC LIMITING CONDITION FOR VOC FOR THE EQUIPMENT LISTED IN PERMIT UNITS C-3609-2, '4, '5, '6, '8, AND '9

### CONDITIONS

1. Authority to Construct (ATC) C-3609-6-0 shall be implemented concurrently, or prior to the modification and startup of the equipment authorized by this Authority to Construct. [District Rule 2201]
2. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
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]
4. 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]
5. VOC emissions from the use of inks shall not exceed 4.4 pounds in any one day. [District Rule 2201]
6. Combined VOC emissions from the equipment listed in permits C-3609-2, '4, '5, '6, '8, and '9 shall not exceed 1,881 pounds in any one year. [District Rule 2201]
7. VOC content (less water and exempt compounds) of low-end flexographic inks shall not exceed 0.3 lb/gallon. [District Rules 2201 and 4607]
8. VOC content (less water and exempt compounds) of high-end flexographic inks shall not exceed 0.88 lb/gallon. [District Rules 2201 and 4607]

CONDITIONS CONTINUE ON NEXT PAGE

**YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 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

**COPY**

Arnaud Marjollet, Director of Permit Services  
C-3609-6-1 Apr 12 2016 3 21PM - GARCIAJ Joint Inspection NOT Required

9. VOC content of cleaning solvents shall not exceed any of the following limits: product cleaning during manufacturing process or surface preparation for ink or adhesive application: 25 g/l (0.21 lb/gal); repair and maintenance cleaning: 25 g/l (0.21 lb/gal); cleaning of ink application equipment: 25 g/l (0.21 lb/gal). [District Rule 4607]
10. 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]
11. 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. 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 non-propellant-induced, hand-held spray bottles. [District Rule 4607]
12. 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]
13. Permittee shall store or dispose of fresh or spent solvents, waste solvent cleaning materials, coatings, 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 Rules 2201 and 4607]
14. Permittee shall maintain a current file of coatings, inks, fountain solutions, wash primers, and solvents in use and in storage. The file shall include material safety data sheet (MSDS) or product data sheet showing the material name, manufacturer's name, VOC content, as applied (or sufficient composition data to calculate this value), material VOC content (or VOC content "as packaged" from manufacturer), mixing instruction, and density. [District Rule 4607]
15. For each ink and solvent used in this operation, the permittee shall record on a monthly basis the product/material name, material type (e.g. ink), amount used (gallons), VOC content, less water and exempt compounds (lb-VOC/gal), and material VOC content (lb-VOC/gal). [District Rules 2201 and 4607]
16. Permittee shall maintain a record of the average daily VOC emissions to be calculated from monthly records of inks, solvents, and cleaning materials used in a calendar month, and the number days this unit is operated in a calendar month. [District Rule 2201]
17. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070, 2201, and 4607]
18. Facilities C-3609 (Sacramento Container Corporation) and C-8609 (Central California Sheets, LLC) are the same Stationary Source. [District Rule 2010]





## AUTHORITY TO CONSTRUCT

**PERMIT NO:** C-3609-8-0

**ISSUANCE DATE:** 03/24/2015

**LEGAL OWNER OR OPERATOR:** SACRAMENTO CONTAINER CORPORATION

**MAILING ADDRESS:** 4841 URBANI AVE  
MCCLELLAN, CA 95652

**LOCATION:** 909 UNION ST  
KINGSBURG, CA 93631-0007

**EQUIPMENT DESCRIPTION:**

MARTIN MODEL 924 FLEXO-PRINTER/FOLDER/GLUER CORRUGATED PAPER BOX MANUFACTURING MACHINE WITH A PERMIT EXEMPT DIE CUTTER SERVED BY A SCRAP COLLECTION SYSTEM WITH A BAGHOUSE (UNCONTROLLED PM10 EMISSIONS LESS THAN 2.0 LB/DAY)

### CONDITIONS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
3. 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]
4. The building exhaust vent located within 1,000 feet of the outer boundary of a K-12 school shall be permanently closed. [CH&SC 42301.6]
5. The building emergency doors located within 1,000 feet of the outer boundary of a K-12 school shall remain closed during all operating hours. [CH&SC 42301.6]
6. The building roof intake hood located within 1,000 feet of the outer boundary of a K-12 school shall be operated with backdraft protection during all operating hours. [CH&SC 42301.6]
7. VOC emissions from the use of inks and adhesives shall not exceed 4.8 pounds in any one day. [District Rule 2201]
8. Combined VOC emissions from the equipment listed in permits C-3609-2, '4, '5, '6, '8, and '9 shall not exceed 1,881 pounds in any one year. [District Rule 2201]

CONDITIONS CONTINUE ON NEXT PAGE

**YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 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

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Arnaud Marjollet, Director of Permit Services  
C-3609-8-0 Apr 12 2016 3:22PM -- GARCIAJ Joint Inspection NOT Required

9. VOC content of adhesive products used in this operation shall not exceed 3.74 g/L (equivalent to 0.0312 lb/gal). [District Rules 2201, 4607 and 4653]
10. VOC content (less water and exempt compounds) of low-end flexographic inks shall not exceed 0.3 lb/gallon. [District Rules 2201 and 4607]
11. VOC content (less water and exempt compounds) of high-end flexographic inks shall not exceed 0.88 lb/gallon. [District Rules 2201 and 4607]
12. VOC content of cleaning solvents shall not exceed any of the following limits: product cleaning during manufacturing process or surface preparation for ink or adhesive application: 25 g/l (0.21 lb/gal); repair and maintenance cleaning: 25 g/l (0.21 lb/gal); cleaning of ink application equipment: 25 g/l (0.21 lb/gal). [District Rule 4607]
13. 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]
14. 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. 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 non-propellant-induced, hand-held spray bottles. [District Rule 4607]
15. 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]
16. 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 Rules 2201 and 4607]
17. Permittee shall maintain a current file of coatings, inks, adhesives, fountain solutions, wash primers, and solvents in use and in storage. The file shall include material safety data sheet (MSDS) or product data sheet showing the material name, manufacturer's name, VOC content as applied (or sufficient composition data to calculate this value), material VOC content (or VOC content "as packaged" from manufacturer), mixing instruction, and density. [District Rule 4607]
18. For each ink, adhesive, and solvent used in this operation, the permittee shall record on a monthly basis the product/material name, material type (e.g. ink), amount used (gallons), VOC content, less water and exempt compounds (lb-VOC/gal), and material VOC content (lb-VOC/gal). [District Rules 2201 and 4607]
19. Permittee shall maintain a record of the average daily VOC emissions to be calculated from monthly records of inks, adhesives, solvents and cleaning materials used in a calendar month, and the number days this unit is operated in a calendar month. [District Rule 2201]
20. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070, 2201, and 4607]
21. Facilities C-3609 (Sacramento Container Corporation) and C-8609 (Central California Sheets, LLC) are the same Stationary Source. [District Rule 2010]

## AUTHORITY TO CONSTRUCT

**PERMIT NO:** C-3609-9-0

**ISSUANCE DATE:** 03/24/2015

**LEGAL OWNER OR OPERATOR:** SACRAMENTO CONTAINER CORPORATION

**MAILING ADDRESS:** 4841 URBANI AVE  
MCCLELLAN, CA 95652

**LOCATION:** 909 UNION ST  
KINGSBURG, CA 93631-0007

**EQUIPMENT DESCRIPTION:**

WARD MODEL # 16000 SV (S/N 16331) 4-COLOR FLEXOGRAPHIC PRINTER CORRUGATED PAPER BOX MACHINE WITH A PERMIT EXEMPT ROTARY DIE CUTTER SERVED BY A SCRAP COLLECTION SYSTEM WITH A BAGHOUSE (UNCONTROLLED PM10 EMISSIONS LESS THAN 2.0 LB/DAY)

### CONDITIONS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
3. 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]
4. The building exhaust vent located within 1,000 feet of the outer boundary of a K-12 school shall be permanently closed. [CH&SC 42301.6]
5. The building emergency doors located within 1,000 feet of the outer boundary of a K-12 school shall remain closed during all operating hours. [CH&SC 42301.6]
6. The building roof intake hood located within 1,000 feet of the outer boundary of a K-12 school shall be operated with backdraft protection during all operating hours. [CH&SC 42301.6]
7. VOC emissions from the use of inks shall not exceed 4.4 pounds in any one day. [District Rule 2201]
8. Combined VOC emissions from the equipment listed in permits C-3609-2, '4, '5, '6, '8, and '9 shall not exceed 1,881 pounds in any one year. [District Rule 2201]

CONDITIONS CONTINUE ON NEXT PAGE

**YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 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

**COPY**

Arnaud Marjollet, Director of Permit Services  
C-3609-9-0 : Apr 12 2015 3:22PM -- GARCIAJ Joint Inspection NOT Required

9. VOC content (less water and exempt compounds) of low-end flexographic inks shall not exceed 0.3 lb/gallon. [District Rules 2201 and 4607]
10. VOC content (less water and exempt compounds) of high-end flexographic inks shall not exceed 0.88 lb/gallon. [District Rules 2201 and 4607]
11. VOC content of cleaning solvents shall not exceed any of the following limits: product cleaning during manufacturing process or surface preparation for ink or adhesive application: 25 g/l (0.21 lb/gal); repair and maintenance cleaning: 25 g/l (0.21 lb/gal); cleaning of ink application equipment: 25 g/l (0.21 lb/gal). [District Rule 4607]
12. 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]
13. 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. 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 non-propellant-induced, hand-held spray bottles. [District Rule 4607]
14. 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]
15. Permittee shall store or dispose of fresh or spent solvents, waste solvent cleaning materials, coatings, 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 Rules 2201 and 4607]
16. Permittee shall maintain a current file of coatings, inks, fountain solutions, wash primers, and solvents in use and in storage. The file shall include material safety data sheet (MSDS) or product data sheet showing the material name, manufacturer's name, VOC content, as applied (or sufficient composition data to calculate this value), material VOC content (or VOC content "as packaged" from manufacturer), mixing instruction, and density. [District Rule 4607]
17. For each ink and solvent used in this operation, the permittee shall record on a monthly basis the product/material name, material type (e.g. ink), amount used (gallons), VOC content, less water and exempt compounds (lb-VOC/gal), and material VOC content (lb-VOC/gal). [District Rules 2201 and 4607]
18. Permittee shall maintain a record of the average daily VOC emissions to be calculated from monthly records of inks, solvents, and cleaning materials used in a calendar month, and the number days this unit is operated in a calendar month. [District Rule 2201]
19. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070, 2201, and 4607]
20. Facilities C-3609 (Sacramento Container Corporation) and C-8609 (Central California Sheets, LLC) are the same Stationary Source. [District Rule 2010]

## **Appendix B**

### **Statewide Compliance Certification**



909 Union Street  
Kingsburg, CA 93631  
559/419-6111

Mr. Jesse Garcia  
San Joaquin Valley Air Pollution Control District  
1990 E. Gettysburg Avenue  
Fresno, CA 93726

April 12, 2016

**Subject: Compliance Statement for Central California Sheets (C-8609) and Sacramento Container Corp. (C-3609).**

Dear Mr. Garcia:

In accordance with Rule 2201, Section 4.15, "Additional Requirements for New Major Sources and Federal Major Modifications," Central California Sheets (C-8609) and Sacramento Container Corp. (C-3609) are pleased to provide this compliance statement regarding their proposed modification to the corrugated board manufacturing (project N-1160267) and printing machines project N-1160266).

All major stationary sources in California owned or operated by Central California Sheets and Sacramento Container Corp., or by any entity controlling, controlled by, or under common control with Central California Sheets and Sacramento Container Corp., 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: Central California Sheets, 909 Union Street, Kingsburg, CA 93631

Facility #2: Sacramento Container Corp., 909 Union Street, Kingsburg, CA 93631

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,

A handwritten signature in cursive script, appearing to read "David Demeter".

David Demeter  
Regional General Manager  
West Coast Operations

## **Appendix C**

### **BACT Guideline 4.9.13 and Top Down BACT Analysis**

San Joaquin Valley  
Unified Air Pollution Control District

**Best Available Control Technology (BACT) Guideline 4.9.13\***

Last Update: 1/30/2015

**Corrugated Cardboard Manufacturing (Corrugator)**

<b>Pollutant</b>	<b>Achieved in Practice or contained in the SIP</b>	<b>Technologically Feasible</b>	<b>Alternate Basic Equipment</b>
VOC	Steam Conditioning of Paper - 8 lb-VOC/10 <sup>6</sup> sq ft  Adhesives - 0.015 lb-VOC/gal (less water and exempt compounds)	1. VOC Capture and Thermal/Catalytic Incineration  2. VOC Capture and Carbon Adsorption	

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 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 for Permit C-8609-2-1

## Step 1 – Identify all control technologies

From the SJVUAPCD BACT Clearinghouse, Guideline 4.9.13, Corrugated Cardboard, identifies BACT for VOC emissions as follows:

Pollutant	Achieved in Practice or contained in SIP	Technologically Feasible	Alternate Basic Equipment
VOC	Steam conditioning of paper – 8 lb-VOC/10 <sup>6</sup> ft <sup>2</sup> ; Adhesives – 0.015 lb-VOC/gal (less water and exempt compounds)	<ol style="list-style-type: none"> <li>1. VOC Capture and Thermal/Catalytic Oxidation</li> <li>2. capture of VOCs and carbon adsorption</li> <li>3. capture of VOCs and regenerative thermal oxidizer</li> </ol>	

## Step 2 – Eliminate Technologically Infeasible Options

None of the above listed options are technologically infeasible.

## Step 3 – Rank Remaining Control Technologies by Control Effectiveness

Rank	Control Technology	Achieved in Practice
1	VOC Capture and Thermal/Catalytic Oxidizer	N
2	VOC Capture and Carbon Adsorption	N
3	Steam conditioning of paper – 8 lb-VOC/10 <sup>6</sup> ft <sup>2</sup> ; Adhesives – 0.015 lb-VOC/gal (less water and exempt compounds)	Y

## Step 4 – Cost Effectiveness Analysis

Pursuant to Section IX.D of District Policy APR 1305 – BACT Policy, a cost effectiveness analysis is required for the options that have not been determined to be achieved in practice. In accordance with the District's Revised BACT Cost Effectiveness Thresholds Memo (5/14/08), to determine the cost effectiveness of particular technologically feasible control options or alternate equipment options, the amount of emissions resulting from each option will be quantified and compared to the District Standard Emissions allowed by the District Rule that is applicable to the particular unit. The emission reductions will be equal to the difference between the District Standard Emissions and the emissions resulting from the particular option being evaluated.

## **Option 1: VOC Capture and thermal/catalytic oxidation (Technologically Feasible)**

### Assumptions

Per project C-1132539, the required air flow rate is approximately 14,000 cfm.

### Capital Cost

Per Babcock & Wilcox MEGTEC, the cost of an RTO handling a flow rate of 12,573 scfm as quoted on January 7, 2016 for project N-1237, 1142303 would be \$394,100 not including sales tax, freight expenses, operational and maintenance costs, site preparation, etc.

This project requires an oxidizer sized to handle 14,000 scfm; conservatively, the cost for the under-sized 12,573 scfm unit will be used.

Regenerative Thermal Oxidizer Capital Cost = \$394,100

<b>Thermal/Catalytic Oxidation</b>	
Cost Description	Cost (\$)
Regenerative Thermal Oxidizer cost	\$394,100
Inflation adjusting factor (none required)	1.0
Inflation adjusted Regenerative Thermal Oxidizer cost	\$394,100
The following cost data is taken from EPA Control Cost Manual, Sixth Edition (EPA/452/B-02-001).	
<b>Direct Costs (DC)</b>	
Base Equipment Costs (Regenerative Thermal Oxidizer System) See Above	\$394,100
Instrumentation 10%	\$39,410
Sales Tax 3%	\$11,823
Freight 5%	\$19,705
<b>Purchased equipment cost</b>	<b>\$465,038</b>
Foundations & supports 8%	\$37,203
Handling & erection 14%	\$65,105
Electrical 4%	\$18,602
Piping 2%	\$9,301
Painting 1%	\$4,650
Insulation 1%	\$4,650
<b>Direct installation costs</b>	<b>\$139,511</b>
<b>Total Direct Costs</b>	<b>\$604,549</b>
<b>Indirect Costs (IC)</b>	
Engineering 10%	\$46,504
Construction and field expenses 5%	\$23,252
Contractor fees 10%	\$46,504
Start-up 2%	\$9,301
Performance test 1%	\$4,650
Contingencies 3%	\$13,951
<b>Total Indirect Costs</b>	<b>\$144,162</b>
<b>Total Capital Cost (DC + IC)</b>	<b>\$748,711</b>

### Annualized Capital Cost

Pursuant to District Policy APR 1305, section X (11/09/99), the capital cost for the purchase of the equipment will be spread over the expected life of the system using the capital recovery equation. The expected life of the entire system will be estimated at 10 years. A 10% interest rate is assumed in the equation and the assumption will be made that the equipment has no salvage value at the end of the ten-year cycle.

$$A = [P \times i(1+i)^n] / [(1+i)^n - 1]$$

Where: A = Annual Cost

P = Present Value  
 I = Interest Rate (10%)  
 N = Equipment Life (10 years)  
  
 A =  $\$748,711 \times [0.1(1.1)^{10}] / [(1.1)^{10} - 1]$   
 = **\$122,040/year**

### Operation and Maintenance Costs

To perform properly, a catalytic oxidizer (the oxidizer that would require the least amount of heat) would require that the contaminated air stream be heated to 600 degrees F. The ambient temperature of the air fluctuates depending on the time of year but it will be assumed to be 77 degrees F. The following equation will be utilized to determine the quantity of natural gas required to heat the contaminated air from 77 degrees F to 600 degrees F:

$$[\text{Flow Rate} \times C_{p\text{Air}} \times \Delta T \times \text{HEF} \times \text{hr/yr}] - [\text{VOC} \times \text{HC}]$$

Where: Flow Rate is 14,000 scfm  
 $C_{p\text{Air}}$  is the specific heat of air (0.0194 Btu/scf - °F)  
 $\Delta T$  is the change in temperature required  
 HEF is the heat exchanger factor (0.5 is assumed)  
 hr/yr is the number of hours the control device would have to operate. Since the steam generator listed under permit C-8609-3 which supplies steam to the paper board manufacturing process is permitted to operate 8,760 hr/yr, it is assumed the control device will be required to operate as many hours.  
 VOC = 17,600 lb/yr  
 HC is the heat content of the VOC's in the contaminated air stream. The heat content of MEK, which is 13,729 Btu/lb will be assumed as was used in N-1061044 for a similar operation.

$$\begin{aligned} \text{Fuel Requirement} &= [(14,000 \text{ scfm}) \times (60 \text{ min/hr}) \times (0.0194 \text{ Btu/scf} - \text{°F}) \times (600\text{°F} - \\ &\quad 77\text{°F}) \times (0.5) \times (8,760 \text{ hr/yr})] - [(17,600 \text{ lb/yr}) \times (13,729 \text{ Btu/lb})] \\ &= 37,088 \text{ MMBtu/yr} \end{aligned}$$

### Fuel Costs

The cost for natural gas shall be based upon the average price of natural gas sold to "Commercial Consumers" in California for the years 2013, 2014 and 2015.<sup>2</sup>

2015 = \$7.98/thousand ft<sup>3</sup> total monthly average  
 2014 = \$9.05/thousand ft<sup>3</sup> total monthly average  
 2013 = \$7.81/thousand ft<sup>3</sup> total monthly average  
 Average for three years = \$8.28/thousand ft<sup>3</sup> total monthly average

$$\text{Fuel Cost} = (37,088 \text{ MMBtu/yr}) \times (\$8.28/\text{MMBtu}) = \$307,089/\text{yr}$$

<sup>2</sup>

Energy Information Administration/Natural Gas; Average Price of Natural Gas Sold to Commercial Consumers by State, 2010 – 2015: [http://www.eia.gov/dnav/ng/ng\\_pri\\_sum\\_dcu\\_sca\\_a.htm](http://www.eia.gov/dnav/ng/ng_pri_sum_dcu_sca_a.htm)

No additional annual operating and maintenance costs will be considered for this analysis.

### Emission Reduction

Assuming that the designed hood captures 100% of the VOC emissions from each graphic arts operation and the catalytic incinerator controls those VOC emissions with an efficiency of 98%, the amount of VOC emissions reduced is equal to the following:

$$\begin{aligned}\text{Annual Emission Reduction} &= \text{Uncontrolled Emissions} \times 0.98 \\ &= 17,600 \text{ lb-VOC/year} \times 0.98 \\ &= 17,248 \text{ lb-VOC/year} \div 2000 \text{ lb/ton} \\ &= 8.6 \text{ tons-VOC/year}\end{aligned}$$

### Cost Effectiveness

$$\begin{aligned}\text{Cost Effectiveness} &= \$(122,040 + 307,089)/\text{year} \div 8.6 \text{ tons-VOC/year} \\ &= \$49,899/\text{ton-VOC}\end{aligned}$$

The analysis demonstrates that the annualized capital cost of the regenerative thermal/thermal and catalytic oxidizer system results in a cost effectiveness which exceeds the District's Guideline of \$17,500/ton-VOC. The actual cost is expected to be considerably more taking into account the costs of a permanent total enclosure and annual operating costs. Therefore, this option is not cost effective and is being removed from consideration.

### **Option 2: Capture of VOCs and carbon adsorption (Technologically Feasible)**

Carbon adsorption occurs when air containing VOCs are blown through a carbon unit and the VOCs are adsorbed onto the surface of the cracks in the activated carbon particles.

### Capital Costs

The capital costs will not be considered for this analysis.

### Annual Cost

Assuming a carbon adsorption unit achieves a control efficiency of 95% and that the carbon will absorb 20% of its weight in VOCs, the amount of carbon required is determined as follows:

$$\begin{aligned}\text{Carbon required} &= 17,600 \text{ lb-VOC/year} \times 0.95 \times 1/0.20 \\ &= 83,600 \text{ lb-carbon/year}\end{aligned}$$

Per Kurt Keefer of EAS Corp. (916-967-9007), the cost range of a carbon disposal/replacement is \$2/lb to \$10/lb (see project N-1110320). The value of \$2/lb will be used as a conservative estimate and the cost due to inflation will not be considered at this time.

$$\text{Annual Carbon Cost} = 83,600 \text{ lb-carbon/year} \times \$2/\text{lb-carbon} = \$167,200/\text{year}$$

### Emission Reductions

$$\begin{aligned}\text{Annual Emission Reduction} &= 17,600 \text{ lb-VOC/year} \times 0.95 \times \text{ton}/2,000 \text{ lb} \\ &= 8.36 \text{ tons-VOC/year}\end{aligned}$$

### Cost Effectiveness

$$\begin{aligned}\text{Cost Effectiveness} &= \$167,200/\text{year} \div 8.36 \text{ tons-VOC/year} \\ &= \$20,000/\text{ton-VOC}\end{aligned}$$

The analysis demonstrates that the annual carbon cost alone results in a cost effectiveness which exceeds the District's Guideline of \$17,500/ton-VOC. The actual cost is expected to be considerably more taking into account the costs of a permanent total enclosure and carbon adsorption equipment capital costs. Therefore this option is not cost-effective and will not be considered for this project.

### **Step 5 – Select BACT**

Pursuant to the above Top-Down BACT Analysis, there are no cost effective BACT options for corrugators. Therefore, BACT is satisfied with no control equipment.

The applicant is proposing the use of adhesives with no VOCs. Therefore, BACT is satisfied.

## **Appendix D**

**BACT Guideline 4.7.4 and 4.7.15 and Top Down BACT Analysis**

San Joaquin Valley  
Unified Air Pollution Control District

**Best Available Control Technology (BACT) Guideline 4.7.4\***

Last Update: 9/22/2006

**Flexographic Printing - Corrugated Boxes, High End Graphics**

Pollutant	Achieved in Practice or contained in the SIP	Technologically Feasible	Alternate Basic Equipment
VOC	Use of inks with a VOC content not exceeding 1.1 lb/gal (less water & exempt compounds) for high-end graphics and use of inks with a VOC content not exceeding 2.5 lb/gal (less water & exempt compounds) for metallic inks	1) capture of VOCs and thermal or catalytic oxidation.  2) capture of VOCs and carbon absorption  3) capture of VOCs and regenerative thermal oxidizer  4) use of inks with VOC content not exceeding 0.88 lb/gal (less water and exempt compounds) for high-end graphics printing	

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 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**



San Joaquin Valley  
Unified Air Pollution Control District

**Best Available Control Technology (BACT) Guideline 4.7.15\***

Last Update: 9/22/2006

**Flexographic Printing - Corrugated Boxes, Low-end Graphics**

Pollutant	Achieved in Practice or contained in the SIP	Technologically Feasible	Alternate Basic Equipment
VOC	use of coating with a VOC content (less water and exempt compounds) as indicated, or lower: 0.3 lb/gal and evaporative minimization methods, which include keeping all solvents and solvent-laden cloths/papers, not in active use, in closed containers.	1) capture of VOCs and thermal or catalytic oxidation  2) capture of VOCs and carbon absorption  3) capture of VOCs and regenerative thermal oxidizer	

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 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 Flexographic Printing Operation for VOC Emissions for Permits C-3609-2-2, '-4-4, '-5-2, '-6-2, '-8-2, '-9-2

## Step 1 - Identify All Possible Control Technologies

From the SJVUAPCD BACT Clearinghouse, Guideline 4.7.4, Flexographic Printing – Corrugated Boxes, High End Graphics, identifies BACT for VOC emissions as follows:

Pollutant	Achieved in Practice or contained in SIP	Technologically Feasible	Alternate Basic Equipment
VOC	Use of inks with a VOC content not exceeding 1.1 lb/gal (less water & exempt compounds) for high-end graphics and use of inks with a VOC content not exceeding 2.5 lb/gal (less water & exempt compounds) for metallic inks	<ol style="list-style-type: none"> <li>capture of VOCs and thermal or catalytic oxidation</li> <li>capture of VOCs and carbon adsorption</li> <li>capture of VOCs and regenerative thermal oxidizer</li> <li>use of inks with VOC content not exceeding 0.88 lb/gal (less water and exempt compounds) for high-end graphics printing</li> </ol>	

From the SJVUAPCD BACT Clearinghouse, Guideline 4.7.15, Flexographic Printing – Corrugated Boxes, Low-end Graphics, 1<sup>st</sup> quarter 2015, identifies BACT for VOC emissions as follows:

Pollutant	Achieved in Practice or contained in SIP	Technologically Feasible	Alternate Basic Equipment
VOC	use of coating with a VOC content (less water and exempt compounds) as indicated, or lower: 0.3 lb/gal and evaporative minimization methods, which include keeping all solvents and solvent-laden cloths/papers, not in active use, in closed containers.	<ol style="list-style-type: none"> <li>capture of VOCs and thermal or catalytic oxidation</li> <li>capture of VOCs and carbon adsorption</li> <li>capture of VOCs and regenerative thermal oxidizer</li> </ol>	

## Step 2 - Eliminate Technologically Infeasible Options

None of the above listed options are technologically infeasible.

### Step 3 - Rank Remaining Control Technologies by Control Effectiveness

Rank	Control Technology	Achieved in Practice
1	capture of VOCs and thermal or catalytic oxidation	N
	capture of VOCs and regenerative thermal oxidizer	N
2	capture of VOCs and carbon adsorption	N
3	use of inks with VOC content not exceeding 0.88 lb/gal (less water and exempt compounds) for high-end graphics printing	N
4	Use of inks with a VOC content not exceeding 1.1 lb/gal (less water & exempt compounds) for high-end graphics and use of inks with a VOC content not exceeding 2.5 lb/gal (less water & exempt compounds) for metallic inks	Y
4	use of coating with a VOC content (less water and exempt compounds) as indicated, or lower: 0.3 lb/gal and evaporative minimization methods, which include keeping all solvents and solvent-laden cloths/papers, not in active use, in closed containers.	Y

### Step 4 - Cost Effectiveness Analysis

Pursuant to Section IX.D of District Policy APR 1305 – BACT Policy, a cost effectiveness analysis is required for the options that have not been determined to be achieved in practice. In accordance with the District’s Revised BACT Cost Effectiveness Thresholds Memo (5/14/08), to determine the cost effectiveness of particular technologically feasible control options or alternate equipment options, the amount of emissions resulting from each option will be quantified and compared to the District Standard Emissions allowed by the District Rule that is applicable to the particular unit. The emission reductions will be equal to the difference between the District Standard Emissions and the emissions resulting from the particular option being evaluated.

#### **Option 1: capture of VOCs and thermal/catalytic/regenerative thermal oxidation (98% control efficiency) (Technologically Feasible)**

##### Assumptions

Per District practice, it is assumed that an open area maintaining a face velocity of 100 fpm will have no fugitive emissions escaping out of the open area. The airflow that would be needed, to achieve a face velocity of 100 fpm, for a draft hood can be estimated using the following equation:<sup>(1)</sup>

$$Q = 1.4 \times P \times H \times V$$

<sup>(1)</sup> Equation taken from, Industrial Ventilation, 17<sup>th</sup> edition, A Manual of Recommended Practice, Section 5, page 5-101, 1982.

Where: Q = airflow, in dry standard cubic feet per minute  
P = perimeter of printing operation, in feet  
H = height of hood above operation, in feet<sup>(2)</sup>  
FV = face velocity, in feet per minute

Per the applicant, the length and width maximum size of the printing area for each unit is provided in the table below. P is calculated as  $\{(L \times 2) + (W \times 2)\} \times (1 \text{ ft}/12 \text{ inches})$  and Q is calculated using the equation above and presented in the following table:

Permit	Dimensions, inches (L x W)	Source	P, feet	Q, dscfm
C-3609-2	39 x 94	Per Applicant in Project C-1133255	22.2	3,108
C-3609-4	39 x 94	Per Applicant in Project C-1133422	22.2	3,108
C-3609-5	50 x 113		27.2	3,808
C-3609-6	66 x 125	Per Applicant in Project C-1141228	31.8	4,452
C-3609-8	66 x 125	Per Applicant in Project C-1150134	31.8	4,452
C-3609-9	66 x 125		31.8	4,452
Total				23,380

### Capital Cost

Per Babcock & Wilcox MEGTEC, the cost of an RTO handling a flow rate of 12,573 scfm as quoted on January 7, 2016 for project N-1237, 1142303 would be \$394,100 not including sales tax, freight expenses, operational and maintenance costs, site preparation, etc.

This project requires an oxidizer sized to handle 23,380 scfm; conservatively, the cost for the under-sized 12,573 scfm unit will be used.

Regenerative Thermal Oxidizer Capital Cost = \$394,100

<sup>(2)</sup> As a conservative estimate for the purpose of this cost effective analysis, it will be assumed that the draft hood will be hung at a height of 1 foot above the printing presses.

<b>Thermal/Catalytic Oxidation</b>	
Cost Description	Cost (\$)
Regenerative Thermal Oxidizer cost	\$394,100
Inflation adjusting factor (none required)	1.0
Inflation adjusted Regenerative Thermal Oxidizer cost	\$394,100
The following cost data is taken from EPA Control Cost Manual, Sixth Edition (EPA/452/B-02-001).	
<b>Direct Costs (DC)</b>	
Base Equipment Costs (Regenerative Thermal Oxidizer System) See Above	\$394,100
Instrumentation 10%	\$39,410
Sales Tax 3%	\$11,823
Freight 5%	\$19,705
<b>Purchased equipment cost</b>	<b>\$465,038</b>
Foundations & supports 8%	\$37,203
Handling & erection 14%	\$65,105
Electrical 4%	\$18,602
Piping 2%	\$9,301
Painting 1%	\$4,650
Insulation 1%	\$4,650
<b>Direct installation costs</b>	<b>\$139,511</b>
<b>Total Direct Costs</b>	<b>\$604,549</b>
<b>Indirect Costs (IC)</b>	
Engineering 10%	\$46,504
Construction and field expenses 5%	\$23,252
Contractor fees 10%	\$46,504
Start-up 2%	\$9,301
Performance test 1%	\$4,650
Contingencies 3%	\$13,951
<b>Total Indirect Costs</b>	<b>\$144,162</b>
<b>Total Capital Cost (DC + IC)</b>	<b>\$748,711</b>

### Annualized Capital Cost

Pursuant to District Policy APR 1305, section X (11/09/99), the capital cost for the purchase of the equipment will be spread over the expected life of the system using the capital recovery equation. The expected life of the entire system will be estimated at 10 years. A 10% interest rate is assumed in the equation and the assumption will be made that the equipment has no salvage value at the end of the ten-year cycle.

$$A = [P \times i(1+i)^n] / [(1+i)^n - 1]$$

Where: A = Annual Cost  
P = Present Value  
I = Interest Rate (10%)  
N = Equipment Life (10 years)

$$\begin{aligned} A &= \$748,711 \times [0.1(1.1)^{10}] / [(1.1)^{10} - 1] \\ &= \mathbf{\$122,040/year} \end{aligned}$$

### Operation and Maintenance Costs

The annual operating and maintenance costs will not be considered for this analysis.

### Emission Reductions

Assuming that the designed hood captures 100% of the VOC emissions from each graphic arts operation and the catalytic incinerator controls those VOC emissions with an efficiency of 98%, the amount of VOC emissions reduced is equal to the following:

$$\begin{aligned} \text{Annual Emission Reduction} &= \text{Uncontrolled Emissions} \times 0.98 \\ &= 6,184 \text{ lb-VOC/year} \times 0.98 \\ &= 6,060 \text{ lb-VOC/year} \div 2000 \text{ lb/ton} \\ &= 3.0 \text{ tons-VOC/year} \end{aligned}$$

### Cost Effectiveness

Cost Effectiveness = Total Annual Cost ÷ Annual Emission Reductions

$$\begin{aligned} \text{Cost Effectiveness} &= \$122,040/year \div 3.0 \text{ tons-VOC/year} \\ &= \$40,780/ton-VOC \end{aligned}$$

For both high-end and low-end graphics printing, the analysis demonstrates that the annualized purchase cost of the thermal and catalytic oxidizer system alone results in a cost effectiveness which exceeds the District's Guideline of \$17,500/ton-VOC. Therefore this option is not cost-effective and will not be considered for this project.

## Option 2: capture of VOCs and carbon adsorption (Technologically Feasible)

Carbon adsorption occurs when air containing VOC's is blown through a carbon unit and the VOCs are adsorbed onto the surface of the cracks in the activated carbon particles.

### Capital Costs

The capital costs will not be considered for this analysis.

### Annual Cost

Assuming a carbon adsorption unit achieves a control efficiency of 95% and that the carbon will absorb 20% of its weight in VOCs, the amount of carbon required is determined as follows:

$$\begin{aligned}\text{Carbon required} &= 6,184 \text{ lb-VOC/year} \times 0.95 \times 1/0.20 \\ &= \sim 29,000 \text{ lb carbon}\end{aligned}$$

Per Kurt Keefer of EAS Corp. (916-967-9007), the cost range of a carbon disposal/replacement is \$2/lb to \$10/lb (see project N-1110320). The value of \$2/lb will be used as a conservative estimate and the cost due to inflation will not be considered at this time.

$$\text{Annual Carbon Cost} = 29,000 \text{ lb-carbon/year} \times \$2/\text{lb-carbon} = \$58,000/\text{year}$$

### Emission Reductions

Assuming that the designed hood captures 100% of the VOC emissions from the adhesive operation and the carbon adsorption system controls those VOC emissions with an efficiency of 95%, the amount of VOC emissions reduced is equal to the following:

$$\begin{aligned}\text{Annual Emission Reduction} &= \text{Uncontrolled Emissions} \times 0.95 \\ &= 6,184 \text{ lb-VOC/year} \times 0.95 \\ &= 5,875 \text{ lb-VOC/year} \div 2000 \text{ lb/ton} \\ &= 2.9 \text{ tons-VOC/year}\end{aligned}$$

### Cost Effectiveness

$$\text{Cost Effectiveness} = \text{Total Annual Cost} \div \text{Annual Emission Reductions}$$

$$\begin{aligned}\text{Cost Effectiveness} &= \$58,000/\text{year} \div 2.9 \text{ tons-VOC/year} \\ &= \$20,000/\text{ton-VOC}\end{aligned}$$

For both high-end and low-end graphics printing, the analysis demonstrates that the capital cost and cost of the carbon replacement alone results in a cost effectiveness which exceeds the District's Guideline of \$17,500/ton-VOC. Therefore this option is not cost-effective and will not be considered for this project.

**Option 3: use of inks with VOC content not exceeding 0.88 lb/gal (less water and exempt compounds) for high-end graphics printing (Technologically Feasible)**

For high-end graphics printing, since each ink proposed for use in the operation evaluated in this project has a VOC content of less than 0.88 lb/gal, this technologically feasible option is met; therefore, a cost effectiveness analysis is not required.

**Step 5 - Select BACT**

Pursuant to the above Top-Down BACT Analysis, BACT for the corrugated paper box manufacturing operation is satisfied with the following:

For high-end graphics printing, the applicant has proposed inks that meet the requirements of the technologically feasible option 4 from Step 3 above. All other technologically feasible options from Step 3 have been eliminated since each option exceeds the cost effectiveness threshold for VOC emissions. Therefore, for high-end graphics printing, the BACT requirement is met by the use of inks with a VOC content not exceeding 0.88 lb/gal (less water and exempt compounds).

For low-end graphics, each technologically feasible option from Step 3 has been eliminated since each option exceeds the cost effectiveness threshold for VOC emissions. Therefore, for low-end graphics printing, the BACT requirement is met by complying with the achieved in practice category; the use of inks with a VOC content of 0.3 lb/gal (less water and exempt compounds) as indicated, or lower; and evaporative minimization methods, which include keeping all solvents and solvent-laden cloths/papers, not in active use, in closed containers. The applicant has proposed inks which meet these requirements.



## **Appendix E**

### **Health Risk Assessment Analysis**

# San Joaquin Valley Air Pollution Control District Risk Management Review

To: Jesse A. Garcia – Permit Services  
 From: Tadeh Issakhanian – Technical Services  
 Date: April 14, 2016  
 Facility Name: Central Ca Sheets  
 Location: 909 Union St. Kingsburg  
 Application #(s): C-8609-2-1  
 Project #: C-1160267

## A. RMR SUMMARY

RMR Summary			
Categories	Corrugated Box Mfg. w/ Baghouse (Unit 2-1)	Project Totals	Facility Totals
<b>C-8609 &amp; C-3609 are the same stationary source</b>			
<b>Prioritization Score</b>	0.00 <sup>1</sup>	0.90	0.90
<b>Acute Hazard Index</b>	N/A <sup>2</sup>	N/A <sup>2</sup>	N/A
<b>Chronic Hazard Index</b>	N/A <sup>2</sup>	N/A <sup>2</sup>	N/A
<b>Maximum Individual Cancer Risk</b>	N/A <sup>2</sup>	N/A <sup>2</sup>	N/A
<b>T-BACT Required?</b>	<b>No</b>		
<b>Special Permit Requirements?</b>	<b>No</b>		

<sup>1</sup>No HAPs are associated with these units.

<sup>2</sup>This project passes on prioritization with a score less than 1.0; therefore, no further analysis is necessary.

## B. RMR REPORT

### I. Project Description

Technical Services received a request on April 4, 2016 to perform a Risk Management Review for a proposed modification to a corrugated cardboard manufacturing operation. The modification consisted of the installation of: an increase in daily and annual throughput of corrugated board processed.

### II. Analysis

Technical Services reviewed all MSDS sheets submitted by the applicant for toxic air contaminants (TACs). After reviewing the MSDS sheets, it was determined that there are no TACs present that could be related to the increase in VOC. No prioritization was required or performed for this project. Therefore, no further analysis was necessary.

### **III. Conclusion**

The proposed project will not contribute to the facility's risk. 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

# San Joaquin Valley Air Pollution Control District Risk Management Review

To: Jesse A. Garcia – Permit Services  
 From: Tadeh Issakhanian – Technical Services  
 Date: April 20, 2016  
 Facility Name: Sacramento Container Corp.  
 Location: 909 Union St. Kingsburg  
 Application #(s): C-3609-2-2, -4-2, -5-2, -6-2, -8-1, -9-1  
 Project #: C-1160267

## A. RMR SUMMARY

RMR Summary			
Categories	Printing Operation (2-2,4-2,5-2,6-2,8-1,9-1)	Project Totals	Facility Totals
Prioritization Score	0.4	0.4	<1.0
Acute Hazard Index	N/A <sup>1</sup>	N/A <sup>1</sup>	N/A <sup>1</sup>
Chronic Hazard Index	N/A <sup>1</sup>	N/A <sup>1</sup>	N/A <sup>1</sup>
Maximum Individual Cancer Risk	N/A <sup>1</sup>	N/A <sup>1</sup>	N/A <sup>1</sup>
T-BACT Required?	No		
Special Permit Requirements?	No		

<sup>1</sup>Acute and Chronic Hazard Index and Maximum Individual Cancer Risk were not calculated since the total facility prioritization score was less than 1.0.

## B. RMR REPORT

### I. Project Description

Technical Services received a request on April, 4 2016, to perform a Risk Management Review for a proposed increase of annual combined VOC limit for a printing operation.

### II. Analysis

Toxic emissions for this proposed unit were calculated by reviewing annual VOC emissions from ammonia, 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 less than 1.0 (see RMR Summary Table). Therefore, no further analysis was necessary.

The following parameters were used for the review:

<b>Analysis Parameters</b>			
<b>Unit 2-2,4-2,5-2,6-2,8-1,9-1</b>			
<b>VOC Rate (lbs/yr)</b>	4,303	<b>Closest Receptor (m)</b>	98

### III. Conclusion

The prioritization score is less than 1.0. **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

## **Appendix F**

### **Draft Authority to Construct Permits**

San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

ISSUANCE DATE: DRAFT  
**DRAFT**

**PERMIT NO:** C-8609-2-1

**LEGAL OWNER OR OPERATOR:** CENTRAL CALIFORNIA SHEETS, LLC  
**MAILING ADDRESS:** 909 UNION STREET  
KINGSBURG, CA 93631

**LOCATION:** 909 UNION STREET  
KINGSBURG, CA 93631

**EQUIPMENT DESCRIPTION:**  
MODIFICATION OF CORRUGATED BOARD MANUFACTURING OPERATION AND A STARCH-BASED ADHESIVE MIXING SYSTEM WITH PERMIT EXEMPT SCRAP HANDLING SYSTEM SERVED BY A BAGHOUSE (LOW EMITTING UNIT): INCREASE CORRUGATED BOARD PROCESSED LIMIT FROM 7,000,000 SQ FT/DAY AND 1,500,000,000 SQ FT/YEAR TO 8,000,000 SQ FT/DAY AND 2,200,000,000 SQ FT/YEAR

**CONDITIONS**

1. Prior to operating equipment under this Authority to Construct (ATC), permittee shall surrender VOC emission reduction credits for the following quantity of emissions: 1st quarter - 3,297 lb, 2nd quarter - 3,298 lb, 3rd quarter - 3,298 lb, and fourth quarter - 3,298 lb. These amounts include the applicable offset ratio specified in Rule 2201 Section 4.8 (as amended 2/18/16) for the ERC specified below. [District Rule 2201]
2. ERC Certificate Number S-4675-1 (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]
3. Permittee shall submit an application to comply with SJVUAPCD District Rule 2520 - Federally Mandated Operating Permits within 12 months of implementing this ATC. [District Rule 2520]
4. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
5. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
6. The building exhaust vent located within 1,000 feet of the outer boundary of a K-12 school shall be permanently closed. [CH&SC 42301.6]

CONDITIONS CONTINUE ON NEXT PAGE

**YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 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**  
C-8609-2-1 : Apr 25 2018 9:49AM -- GARCIAJ - Joint Inspection NOT Required

7. The building emergency doors located within 1,000 feet of the outer boundary of a K-12 school shall remain closed during all operating hours. [CH&SC 42301.6]
8. The building roof intake hood located within 1,000 feet of the outer boundary of a K-12 school shall be operated with backdraft protection during all operating hours. [CH&SC 42301.6]
9. VOC emissions from the corrugator shall not exceed 8 pounds per million square feet of corrugated boards produced. [District Rule 2201]
10. The quantity of corrugated board processed shall not exceed any of the following: 8,000,000 square feet in any one day and 2,200,000,000 square feet in any one year. [District Rule 2201]
11. Adhesives used shall not contain any VOC. [District Rule 2201]
12. The permittee shall keep records of the date and total amount of the corrugated boards produced in million square feet. [District Rule 2201]
13. All records shall be retained on-site for a minimum of five years and shall be made available to the District upon request. [District Rule 1070]
14. Facilities C-8609 (Central California Sheets, LLC) and C-3609 (Sacramento Container Corporation) are the same Stationary Source. [District Rule 2010]

DRAFT



San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

**ISSUANCE DATE: DRAFT**

**PERMIT NO:** C-3609-2-2

**LEGAL OWNER OR OPERATOR:** SACRAMENTO CONTAINER CORPORATION  
**MAILING ADDRESS:** 4841 URBANI AVE  
MCCLELLAN, CA 95652

**LOCATION:** 909 UNION ST  
KINGSBURG, CA 93631-0007

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF MARTIN MODEL 924 FLEXO-PRINTER/FOLDER/GLUER CORRUGATED PAPER BOX MANUFACTURING MACHINE WITH A PERMIT EXEMPT DIE CUTTER SERVED BY A SCRAP COLLECTION SYSTEM WITH A BAGHOUSE (UNCONTROLLED PM10 EMISSIONS LESS THAN 2.0 LB/DAY); INCREASE SPECIFIC LIMITING CONDITION FROM 1,881 LBS-VOC/YEAR TO 6,184 LBS-VOC/YEAR

**CONDITIONS**

1. Authority to Construct (ATC) C-3609-2-1 shall be implemented concurrently, or prior to the modification and startup of the equipment authorized by this Authority to Construct. [District Rule 2201]
2. This Authority to Construct (ATC) shall be implemented concurrently with ATCs C-3609-4-4, '-5-2, '-6-2, '-8-1, '-9-1. [District Rule 2201]
3. Prior to operating equipment under this Authority to Construct (ATC), permittee shall surrender VOC emission reduction credits for the following quantity of emissions: 1st quarter - 3,297 lb, 2nd quarter - 3,298 lb, 3rd quarter - 3,298 lb, and fourth quarter - 3,298 lb. These amounts include the applicable offset ratio specified in Rule 2201 Section 4.8 (as amended 2/18/16) for the ERC specified below. [District Rule 2201]
4. ERC Certificate Number S-4675-1 (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]
5. Permittee shall submit an application to comply with SJVUAPCD District Rule 2520 - Federally Mandated Operating Permits within 12 months of implementing this ATC. [District Rule 2520]
6. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

CONDITIONS CONTINUE ON NEXT PAGE

**YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 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 Marjolle, Director of Permit Services

C-3609-2-2 Apr 25 2016 9:50AM -- GARCIAJ Joint Inspection NOT Required

7. {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]
8. {271} 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]
9. The building exhaust vent located within 1,000 feet of the outer boundary of a K-12 school shall be permanently closed. [CH&SC 42301.6]
10. The building emergency doors located within 1,000 feet of the outer boundary of a K-12 school shall remain closed during all operating hours. [CH&SC 42301.6]
11. The building roof intake hood located within 1,000 feet of the outer boundary of a K-12 school shall be operated with backdraft protection during all operating hours. [CH&SC 42301.6]
12. VOC emissions from the use of inks and adhesives shall not exceed 4.8 pounds in any one day. [District Rule 2201]
13. Combined VOC emissions from the equipment listed in permits C-3609-2, '4, '5, '6, '8, and '9 shall not exceed 6,184 pounds in any one year, based on a 12 month rolling average. [District Rule 2201]
14. VOC content of adhesive products used in this operation shall not exceed 3.74 g/l (equivalent to 0.0312 lb/gal). [District Rules 2201, 4607 and 4653]
15. VOC content (less water and exempt compounds) of low-end flexographic inks shall not exceed 0.3 lb/gallon. [District Rules 2201 and 4607]
16. VOC content (less water and exempt compounds) of high-end flexographic inks shall not exceed 0.88 lb/gallon. [District Rules 2201 and 4607]
17. VOC content of cleaning solvents shall not exceed any of the following limits: product cleaning during manufacturing process or surface preparation for ink or adhesive application: 25 g/l (0.21 lb/gal); repair and maintenance cleaning: 25 g/l (0.21 lb/gal); cleaning of ink application equipment: 25 g/l (0.21 lb/gal). [District Rule 4607]
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 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]
19. 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. 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 non-propellant-induced, hand-held spray bottles. [District Rule 4607]
20. 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]
21. 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 Rules 2201 and 4607]

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CONDITIONS CONTINUE ON NEXT PAGE

22. Permittee shall maintain a current file of coatings, inks, adhesives, fountain solutions, wash primers, and solvents in use and in storage. The file shall include material safety data sheet (MSDS) or product data sheet showing the material name, manufacturer's name, VOC content as applied (or sufficient composition data to calculate this value), material VOC content (or VOC content "as packaged" from manufacturer), mixing instruction, and density. [District Rule 4607]
23. For each ink, adhesive, and solvent used in this operation, the permittee shall record on a monthly basis the product/material name, material type (e.g. ink), amount used (gallons), VOC content, less water and exempt compounds (lb-VOC/gal), and material VOC content (lb-VOC/gal). [District Rules 2201 and 4607]
24. Permittee shall maintain a record of the average daily VOC emissions to be calculated from monthly records of inks, adhesives, solvents and cleaning materials used in a calendar month, and the number days this unit is operated in a calendar month. [District Rule 2201]
25. Permittee shall maintain a record of the combined annual VOC emissions from permits C-3609-2, '4, '5, '6, '8, and '9, updated monthly. [District Rule 2201]
26. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070, 2201, and 4607]
27. Facilities C-3609 (Sacramento Container Corporation) and C-8609 (Central California Sheets, LLC) are the same Stationary Source. [District Rule 2010]

DRAFT

San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

**ISSUANCE DATE:** DRAFT

**PERMIT NO:** C-3609-4-2

**LEGAL OWNER OR OPERATOR:** SACRAMENTO CONTAINER CORPORATION  
**MAILING ADDRESS:** 4841 URBANI AVE  
MCCLELLAN, CA 95652

**LOCATION:** 909 UNION ST  
KINGSBURG, CA 93631-0007

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF MARTIN MODEL 924 FLEXO-PRINTER/FOLDER/GLUER CORRUGATED PAPER BOX MANUFACTURING MACHINE WITH A PERMIT EXEMPT DIE CUTTER SERVED BY A SCRAP COLLECTION SYSTEM WITH A BAGHOUSE (UNCONTROLLED PM10 EMISSIONS LESS THAN 2.0 LB/DAY): INCREASE SPECIFIC LIMITING CONDITION FROM 1,881 LBS-VOC/YEAR TO 6,184 LBS-VOC/YEAR

**CONDITIONS**

1. Authority to Construct (ATC) C-3609-4-1 shall be implemented concurrently, or prior to the modification and startup of the equipment authorized by this Authority to Construct. [District Rule 2201]
2. This Authority to Construct (ATC) shall be implemented concurrently with ATCs C-3609-2-2, '-5-2, '-6-2, '-8-1, '-9-1. [District Rule 2201]
3. Prior to operating equipment under this Authority to Construct (ATC), permittee shall surrender VOC emission reduction credits for the following quantity of emissions: 1st quarter - 3,297 lb, 2nd quarter - 3,298 lb, 3rd quarter - 3,298 lb, and fourth quarter - 3,298 lb. These amounts include the applicable offset ratio specified in Rule 2201 Section 4.8 (as amended 2/18/16) for the ERC specified below. [District Rule 2201]
4. ERC Certificate Number S-4675-1 (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]
5. Permittee shall submit an application to comply with SJVUAPCD District Rule 2520 - Federally Mandated Operating Permits within 12 months of implementing this ATC. [District Rule 2520]
6. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

CONDITIONS CONTINUE ON NEXT PAGE

**YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 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 Marjolle, Director of Permit Services  
C-3609-4-2, Apr 25 2016, 9:50AM - GARCIAJ Joint Inspection NOT Required

7. {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]
8. {271} 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]
9. The building exhaust vent located within 1,000 feet of the outer boundary of a K-12 school shall be permanently closed. [CH&SC 42301.6]
10. The building emergency doors located within 1,000 feet of the outer boundary of a K-12 school shall remain closed during all operating hours. [CH&SC 42301.6]
11. The building roof intake hood located within 1,000 feet of the outer boundary of a K-12 school shall be operated with backdraft protection during all operating hours. [CH&SC 42301.6]
12. VOC emissions from the use of inks and adhesives shall not exceed 4.8 pounds in any one day. [District Rule 2201]
13. Combined VOC emissions from the equipment listed in permits C-3609-2, '4, '5, '6, '8, and '9 shall not exceed 6,184 pounds in any one year, based on a 12 month rolling average. [District Rule 2201]
14. VOC content of adhesive products used in this operation shall not exceed 3.74 g/l (equivalent to 0.0312 lb/gal). [District Rules 2201, 4607 and 4653]
15. VOC content (less water and exempt compounds) of low-end flexographic inks shall not exceed 0.3 lb/gallon. [District Rules 2201 and 4607]
16. VOC content (less water and exempt compounds) of high-end flexographic inks shall not exceed 0.88 lb/gallon. [District Rules 2201 and 4607]
17. VOC content of cleaning solvents shall not exceed any of the following limits: product cleaning during manufacturing process or surface preparation for ink or adhesive application: 25 g/l (0.21 lb/gal); repair and maintenance cleaning: 25 g/l (0.21 lb/gal); cleaning of ink application equipment: 25 g/l (0.21 lb/gal). [District Rule 4607]
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 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]
19. 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. 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 non-propellant-induced, hand-held spray bottles. [District Rule 4607]
20. 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]
21. 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 Rules 2201 and 4607]

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CONDITIONS CONTINUE ON NEXT PAGE

22. Permittee shall maintain a current file of coatings, inks, adhesives, fountain solutions, wash primers, and solvents in use and in storage. The file shall include material safety data sheet (MSDS) or product data sheet showing the material name, manufacturer's name, VOC content as applied (or sufficient composition data to calculate this value), material VOC content (or VOC content "as packaged" from manufacturer), mixing instruction, and density. [District Rule 4607]
23. For each ink, adhesive, and solvent used in this operation, the permittee shall record on a monthly basis the product/material name, material type (e.g. ink), amount used (gallons), VOC content, less water and exempt compounds (lb-VOC/gal), and material VOC content (lb-VOC/gal). [District Rules 2201 and 4607]
24. Permittee shall maintain a record of the average daily VOC emissions to be calculated from monthly records of inks, adhesives, solvents and cleaning materials used in a calendar month, and the number days this unit is operated in a calendar month. [District Rule 2201]
25. Permittee shall maintain a record of the combined annual VOC emissions from permits C-3609-2, '4, '5, '6, '8, and '9, updated monthly. [District Rule 2201]
26. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070, 2201, and 4607]
27. Facilities C-3609 (Sacramento Container Corporation) and C-8609 (Central California Sheets, LLC) are the same Stationary Source. [District Rule 2010]

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San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

**ISSUANCE DATE:** DRAFT

**PERMIT NO:** C-3609-5-2

**LEGAL OWNER OR OPERATOR:** SACRAMENTO CONTAINER CORPORATION  
**MAILING ADDRESS:** 4841 URBANI AVE  
MCCLELLAN, CA 95652

**LOCATION:** 909 UNION ST  
KINGSBURG, CA 93631-0007

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF WARD MODEL 4-C FLEXO-PRINTER/FOLDER/GLUER CORRUGATED PAPER BOX MANUFACTURING MACHINE WITH A PERMIT EXEMPT DIE CUTTER SERVED BY A SCRAP COLLECTION SYSTEM WITH A BAGHOUSE (UNCONTROLLED PM10 EMISSIONS LESS THAN 2.0 LB/DAY): INCREASE SPECIFIC LIMITING CONDITION FROM 1,881 LBS-VOC/YEAR TO 6,184 LBS-VOC/YEAR

**CONDITIONS**

1. Authority to Construct (ATC) C-3609-5-1 shall be implemented concurrently, or prior to the modification and startup of the equipment authorized by this Authority to Construct. [District Rule 2201]
2. This Authority to Construct (ATC) shall be implemented concurrently with ATCs C-3609-2-2, '-4-4, '-6-2, '-8-1, '-9-1. [District Rule 2201]
3. Prior to operating equipment under this Authority to Construct (ATC), permittee shall surrender VOC emission reduction credits for the following quantity of emissions: 1st quarter - 3,297 lb, 2nd quarter - 3,298 lb, 3rd quarter - 3,298 lb, and fourth quarter - 3,298 lb. These amounts include the applicable offset ratio specified in Rule 2201 Section 4.8 (as amended 2/18/16) for the ERC specified below. [District Rule 2201]
4. ERC Certificate Number S-4675-1 (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]
5. Permittee shall submit an application to comply with SJVUAPCD District Rule 2520 - Federally Mandated Operating Permits within 12 months of implementing this ATC. [District Rule 2520]
6. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

CONDITIONS CONTINUE ON NEXT PAGE

**YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 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 Marjolle, Director of Permit Services

C-3609-5-2 Apr 25 2016 9:58AM -- GARCIAJ Joint Inspection NOT Required

7. {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]
8. {271} 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]
9. The building exhaust vent located within 1,000 feet of the outer boundary of a K-12 school shall be permanently closed. [CH&SC 42301.6]
10. The building emergency doors located within 1,000 feet of the outer boundary of a K-12 school shall remain closed during all operating hours. [CH&SC 42301.6]
11. The building roof intake hood located within 1,000 feet of the outer boundary of a K-12 school shall be operated with backdraft protection during all operating hours. [CH&SC 42301.6]
12. VOC emissions from the use of inks and adhesives shall not exceed 4.8 pounds in any one day. [District Rule 2201]
13. Combined VOC emissions from the equipment listed in permits C-3609-2, '4, '5, '6, '8, and '9 shall not exceed 6,184 pounds in any one year, based on a 12 month rolling average. [District Rule 2201]
14. VOC content of adhesive products used in this operation shall not exceed 3.74 g/l (equivalent to 0.0312 lb/gal). [District Rules 2201, 4607 and 4653]
15. VOC content (less water and exempt compounds) of low-end flexographic inks shall not exceed 0.3 lb/gallon. [District Rules 2201 and 4607]
16. VOC content (less water and exempt compounds) of high-end flexographic inks shall not exceed 0.88 lb/gallon. [District Rules 2201 and 4607]
17. VOC content of cleaning solvents shall not exceed any of the following limits: product cleaning during manufacturing process or surface preparation for ink or adhesive application: 25 g/l (0.21 lb/gal); repair and maintenance cleaning: 25 g/l (0.21 lb/gal); cleaning of ink application equipment: 25 g/l (0.21 lb/gal). [District Rule 4607]
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 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]
19. 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. 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 non-propellant-induced, hand-held spray bottles. [District Rule 4607]
20. 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]
21. 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 Rules 2201 and 4607]

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CONDITIONS CONTINUE ON NEXT PAGE



22. Permittee shall maintain a current file of coatings, inks, adhesives, fountain solutions, wash primers, and solvents in use and in storage. The file shall include material safety data sheet (MSDS) or product data sheet showing the material name, manufacturer's name, VOC content as applied (or sufficient composition data to calculate this value), material VOC content (or VOC content "as packaged" from manufacturer), mixing instruction, and density. [District Rule 4607]
23. For each ink, adhesive, and solvent used in this operation, the permittee shall record on a monthly basis the product/material name, material type (e.g. ink), amount used (gallons), VOC content, less water and exempt compounds (lb-VOC/gal), and material VOC content (lb-VOC/gal). [District Rules 2201 and 4607]
24. Permittee shall maintain a record of the average daily VOC emissions to be calculated from monthly records of inks, adhesives, solvents and cleaning materials used in a calendar month, and the number days this unit is operated in a calendar month. [District Rule 2201]
25. Permittee shall maintain a record of the combined annual VOC emissions from permits C-3609-2, '4, '5, '6, '8, and '9, updated monthly. [District Rule 2201]
26. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070, 2201, and 4607]
27. Facilities C-3609 (Sacramento Container Corporation) and C-8609 (Central California Sheets, LLC) are the same Stationary Source. [District Rule 2010]

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San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

**DRAFT**  
ISSUANCE DATE: DRAFT

**PERMIT NO:** C-3609-6-2

**LEGAL OWNER OR OPERATOR:** SACRAMENTO CONTAINER CORPORATION  
**MAILING ADDRESS:** 4841 URBANI AVE  
MCCLELLAN, CA 95652

**LOCATION:** 909 UNION ST  
KINGSBURG, CA 93631-0007

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF WARD MODEL # 16000 SV (S/N 16331) 4-COLOR FLEXOGRAPHIC PRINTER CORRUGATED PAPER BOX MACHINE WITH A PERMIT EXEMPT ROTARY DIE CUTTER SERVED BY A SCRAP COLLECTION SYSTEM WITH A BAGHOUSE (UNCONTROLLED PM10 EMISSIONS LESS THAN 2.0 LB/DAY): INCREASE SPECIFIC LIMITING CONDITION FROM 1,881 LBS-VOC/YEAR TO 6,184 LBS-VOC/YEAR

**CONDITIONS**

1. Authority to Construct (ATC) C-3609-6-1 shall be implemented concurrently, or prior to the modification and startup of the equipment authorized by this Authority to Construct. [District Rule 2201]
2. This Authority to Construct (ATC) shall be implemented concurrently with ATCs C-3609-2-2, '-4-4, '-5-2, '-8-1, '-9-1. [District Rule 2201]
3. Prior to operating equipment under this Authority to Construct (ATC), permittee shall surrender VOC emission reduction credits for the following quantity of emissions: 1st quarter - 3,297 lb, 2nd quarter - 3,298 lb, 3rd quarter - 3,298 lb, and fourth quarter - 3,298 lb. These amounts include the applicable offset ratio specified in Rule 2201 Section 4.8 (as amended 2/18/16) for the ERC specified below. [District Rule 2201]
4. ERC Certificate Number S-4675-1 (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]
5. Permittee shall submit an application to comply with SJVUAPCD District Rule 2520 - Federally Mandated Operating Permits within 12 months of implementing this ATC. [District Rule 2520]
6. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

CONDITIONS CONTINUE ON NEXT PAGE

**YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 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 Marjolle, Director of Permit Services**

C-3609-6-2 Apr 25 2016 9:50AM -- GARCIAJ Joint Inspection NOT Required

7. {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]
8. {271} 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]
9. The building exhaust vent located within 1,000 feet of the outer boundary of a K-12 school shall be permanently closed. [CH&SC 42301.6]
10. The building emergency doors located within 1,000 feet of the outer boundary of a K-12 school shall remain closed during all operating hours. [CH&SC 42301.6]
11. The building roof intake hood located within 1,000 feet of the outer boundary of a K-12 school shall be operated with backdraft protection during all operating hours. [CH&SC 42301.6]
12. VOC emissions from the use of inks shall not exceed 4.4 pounds in any one day. [District Rule 2201]
13. Combined VOC emissions from the equipment listed in permits C-3609-2, '4, '5, '6, '8, and '9 shall not exceed 6,184 pounds in any one year, based on a 12 month rolling average. [District Rule 2201]
14. VOC content of cleaning solvents shall not exceed any of the following limits: product cleaning during manufacturing process or surface preparation for ink or adhesive application: 25 g/l (0.21 lb/gal); repair and maintenance cleaning: 25 g/l (0.21 lb/gal); cleaning of ink application equipment: 25 g/l (0.21 lb/gal). [District Rule 4607]
15. 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]
16. 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. 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 non-propellant-induced, hand-held spray bottles. [District Rule 4607]
17. 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]
18. Permittee shall store or dispose of fresh or spent solvents, waste solvent cleaning materials, coatings, 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 Rules 2201 and 4607]
19. Permittee shall maintain a current file of coatings, inks, fountain solutions, wash primers, and solvents in use and in storage. The file shall include material safety data sheet (MSDS) or product data sheet showing the material name, manufacturer's name, VOC content, as applied (or sufficient composition data to calculate this value), material VOC content (or VOC content "as packaged" from manufacturer), mixing instruction, and density. [District Rule 4607]
20. For each ink and solvent used in this operation, the permittee shall record on a monthly basis the product/material name, material type (e.g. ink), amount used (gallons), VOC content, less water and exempt compounds (lb-VOC/gal), and material VOC content (lb-VOC/gal). [District Rules 2201 and 4607]

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CONDITIONS CONTINUE ON NEXT PAGE

21. Permittee shall maintain a record of the average daily VOC emissions to be calculated from monthly records of inks, adhesives, solvents and cleaning materials used in a calendar month, and the number days this unit is operated in a calendar month. [District Rule 2201]
22. Permittee shall maintain a record of the combined annual VOC emissions from permits C-3609-2, '4, '5, '6, '8, and '9, updated monthly. [District Rule 2201]
23. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070, 2201, and 4607]
24. Facilities C-3609 (Sacramento Container Corporation) and C-8609 (Central California Sheets, LLC) are the same Stationary Source. [District Rule 2010]

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San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

**ISSUANCE DATE:** DRAFT

**PERMIT NO:** C-3609-8-1

**LEGAL OWNER OR OPERATOR:** SACRAMENTO CONTAINER CORPORATION  
**MAILING ADDRESS:** 4841 URBANI AVE  
MCCLELLAN, CA 95652

**LOCATION:** 909 UNION ST  
KINGSBURG, CA 93631-0007

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF MARTIN MODEL 924 FLEXO-PRINTER/FOLDER/GLUER CORRUGATED PAPER BOX MANUFACTURING MACHINE WITH A PERMIT EXEMPT DIE CUTTER SERVED BY A SCRAP COLLECTION SYSTEM WITH A BAGHOUSE (UNCONTROLLED PM10 EMISSIONS LESS THAN 2.0 LB/DAY); INCREASE SPECIFIC LIMITING CONDITION FROM 1,881 LBS-VOC/YEAR TO 6,184 LBS-VOC/YEAR

**CONDITIONS**

1. Authority to Construct (ATC) C-3609-8-0 shall be implemented concurrently, or prior to the modification and startup of the equipment authorized by this Authority to Construct. [District Rule 2201]
2. This Authority to Construct (ATC) shall be implemented concurrently with ATCs C-3609-2-2, '-4-4, '-5-2, '-6-2, '-9-1. [District Rule 2201]
3. Prior to operating equipment under this Authority to Construct (ATC), permittee shall surrender VOC emission reduction credits for the following quantity of emissions: 1st quarter - 3,297 lb, 2nd quarter - 3,298 lb, 3rd quarter - 3,298 lb, and fourth quarter - 3,298 lb. These amounts include the applicable offset ratio specified in Rule 2201 Section 4.8 (as amended 2/18/16) for the ERC specified below. [District Rule 2201]
4. ERC Certificate Number S-4675-1 (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]
5. Permittee shall submit an application to comply with SJVUAPCD District Rule 2520 - Federally Mandated Operating Permits within 12 months of implementing this ATC. [District Rule 2520]
6. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

CONDITIONS CONTINUE ON NEXT PAGE

**YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 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

C-3609-8-1 Apr 25 2016 9:50AM -- GARCIAJ Joint Inspection NOT Required

7. {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]
8. {271} 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]
9. The building exhaust vent located within 1,000 feet of the outer boundary of a K-12 school shall be permanently closed. [CH&SC 42301.6]
10. The building emergency doors located within 1,000 feet of the outer boundary of a K-12 school shall remain closed during all operating hours. [CH&SC 42301.6]
11. The building roof intake hood located within 1,000 feet of the outer boundary of a K-12 school shall be operated with backdraft protection during all operating hours. [CH&SC 42301.6]
12. VOC emissions from the use of inks and adhesives shall not exceed 4.8 pounds in any one day. [District Rule 2201]
13. Combined VOC emissions from the equipment listed in permits C-3609-2, '4, '5, '6, '8, and '9 shall not exceed 6,184 pounds in any one year, based on a 12 month rolling average. [District Rule 2201]
14. VOC content of adhesive products used in this operation shall not exceed 3.74 g/l (equivalent to 0.0312 lb/gal). [District Rules 2201, 4607 and 4653]
15. VOC content (less water and exempt compounds) of low-end flexographic inks shall not exceed 0.3 lb/gallon. [District Rules 2201 and 4607]
16. VOC content (less water and exempt compounds) of high-end flexographic inks shall not exceed 0.88 lb/gallon. [District Rules 2201 and 4607]
17. VOC content of cleaning solvents shall not exceed any of the following limits: product cleaning during manufacturing process or surface preparation for ink or adhesive application: 25 g/l (0.21 lb/gal); repair and maintenance cleaning: 25 g/l (0.21 lb/gal); cleaning of ink application equipment: 25 g/l (0.21 lb/gal). [District Rule 4607]
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 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]
19. 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. 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 non-propellant-induced, hand-held spray bottles. [District Rule 4607]
20. 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]
21. 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 Rules 2201 and 4607]

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CONDITIONS CONTINUE ON NEXT PAGE

22. Permittee shall maintain a current file of coatings, inks, adhesives, fountain solutions, wash primers, and solvents in use and in storage. The file shall include material safety data sheet (MSDS) or product data sheet showing the material name, manufacturer's name, VOC content as applied (or sufficient composition data to calculate this value), material VOC content (or VOC content "as packaged" from manufacturer), mixing instruction, and density. [District Rule 4607]
23. For each ink, adhesive, and solvent used in this operation, the permittee shall record on a monthly basis the product/material name, material type (e.g. ink), amount used (gallons), VOC content, less water and exempt compounds (lb-VOC/gal), and material VOC content (lb-VOC/gal). [District Rules 2201 and 4607]
24. Permittee shall maintain a record of the average daily VOC emissions to be calculated from monthly records of inks, adhesives, solvents and cleaning materials used in a calendar month, and the number days this unit is operated in a calendar month. [District Rule 2201]
25. Permittee shall maintain a record of the combined annual VOC emissions from permits C-3609-2, '4, '5, '6, '8, and '9, updated monthly. [District Rule 2201]
26. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070, 2201, and 4607]
27. Facilities C-3609 (Sacramento Container Corporation) and C-8609 (Central California Sheets, LLC) are the same Stationary Source. [District Rule 2010]

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San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

ISSUANCE DATE: DRAFT  
**DRAFT**

**PERMIT NO:** C-3609-9-1

**LEGAL OWNER OR OPERATOR:** SACRAMENTO CONTAINER CORPORATION  
**MAILING ADDRESS:** 4841 URBANI AVE  
MCCLELLAN, CA 95652

**LOCATION:** 909 UNION ST  
KINGSBURG, CA 93631-0007

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF WARD MODEL # 16000 SV (S/N 16331) 4-COLOR FLEXOGRAPHIC PRINTER CORRUGATED PAPER BOX MACHINE WITH A PERMIT EXEMPT ROTARY DIE CUTTER SERVED BY A SCRAP COLLECTION SYSTEM WITH A BAGHOUSE (UNCONTROLLED PM10 EMISSIONS LESS THAN 2.0 LB/DAY): INCREASE SPECIFIC LIMITING CONDITION FROM 1,881 LBS-VOC/YEAR TO 6,184 LBS-VOC/YEAR

**CONDITIONS**

1. Authority to Construct (ATC) C-3609-9-0 shall be implemented concurrently, or prior to the modification and startup of the equipment authorized by this Authority to Construct. [District Rule 2201]
2. This Authority to Construct (ATC) shall be implemented concurrently with ATCs C-3609-2-2, '-4-4, '-5-2, '-6-2, '-8-2. [District Rule 2201]
3. Prior to operating equipment under this Authority to Construct (ATC), permittee shall surrender VOC emission reduction credits for the following quantity of emissions: 1st quarter - 3,297 lb, 2nd quarter - 3,298 lb, 3rd quarter - 3,298 lb, and fourth quarter - 3,298 lb. These amounts include the applicable offset ratio specified in Rule 2201 Section 4.8 (as amended 2/18/16) for the ERC specified below. [District Rule 2201]
4. ERC Certificate Number S-4675-1 (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]
5. Permittee shall submit an application to comply with SJVUAPCD District Rule 2520 - Federally Mandated Operating Permits within 12 months of implementing this ATC. [District Rule 2520]
6. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

CONDITIONS CONTINUE ON NEXT PAGE

**YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 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 Marjolle, Director of Permit Services**  
C-3609-9-1 Apr 25 2016 9:50AM - GARCIAJ Joint Inspection NOT Required



7. {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]
8. {271} 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]
9. The building exhaust vent located within 1,000 feet of the outer boundary of a K-12 school shall be permanently closed. [CH&SC 42301.6]
10. The building emergency doors located within 1,000 feet of the outer boundary of a K-12 school shall remain closed during all operating hours. [CH&SC 42301.6]
11. The building roof intake hood located within 1,000 feet of the outer boundary of a K-12 school shall be operated with backdraft protection during all operating hours. [CH&SC 42301.6]
12. VOC emissions from the use of inks shall not exceed 4.4 pounds in any one day. [District Rule 2201]
13. Combined VOC emissions from the equipment listed in permits C-3609-2, '4, '5, '6, '8, and '9 shall not exceed 6,184 pounds in any one year, based on a 12 month rolling average. [District Rule 2201]
14. VOC content (less water and exempt compounds) of low-end flexographic inks shall not exceed 0.3 lb/gallon. [District Rules 2201 and 4607]
15. VOC content (less water and exempt compounds) of high-end flexographic inks shall not exceed 0.88 lb/gallon. [District Rules 2201 and 4607]
16. VOC content of cleaning solvents shall not exceed any of the following limits: product cleaning during manufacturing process or surface preparation for ink or adhesive application: 25 g/l (0.21 lb/gal); repair and maintenance cleaning: 25 g/l (0.21 lb/gal); cleaning of ink application equipment: 25 g/l (0.21 lb/gal). [District Rule 4607]
17. 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]
18. 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. 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 non-propellant-induced, hand-held spray bottles. [District Rule 4607]
19. 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]
20. Permittee shall store or dispose of fresh or spent solvents, waste solvent cleaning materials, coatings, 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 Rules 2201 and 4607]
21. Permittee shall maintain a current file of coatings, inks, fountain solutions, wash primers, and solvents in use and in storage. The file shall include material safety data sheet (MSDS) or product data sheet showing the material name, manufacturer's name, VOC content, as applied (or sufficient composition data to calculate this value), material VOC content (or VOC content "as packaged" from manufacturer), mixing instruction, and density. [District Rule 4607]

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CONDITIONS CONTINUE ON NEXT PAGE

22. For each ink and solvent used in this operation, the permittee shall record on a monthly basis the product/material name, material type (e.g. ink), amount used (gallons), VOC content, less water and exempt compounds (lb-VOC/gal), and material VOC content (lb-VOC/gal). [District Rules 2201 and 4607]
23. Permittee shall maintain a record of the average daily VOC emissions to be calculated from monthly records of inks, adhesives, solvents and cleaning materials used in a calendar month, and the number days this unit is operated in a calendar month. [District Rule 2201]
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, 2201, and 4607]
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