

JUN 20 2016

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

**Re: Final - Authority to Construct / Certificate of Conformity (Significant Mod)  
District Facility # N-3606  
Project # N-1160509**

Dear Mr. McCullough:

The Air Pollution Control Officer has issued an Authority to Construct (N-3606-33-0) with a Certificate of Conformity to Pacific Southwest Container at 4530 Leckron Road, Modesto, CA 95357. This project is to install a new lithographic printing press, and keep the facility-wide VOC emissions unchanged. Enclosed are the Authority to Construct and a copy of the notice of final action to be published approximately three days from the date of this letter.

Notice of the District's preliminary decision to issue the Authority to Construct permit was published on April 29, 2016. The District's analysis of the proposal was also sent to CARB and US EPA Region IX on April 26, 2016. No comments were received following the District's preliminary decision on this project.

Prior to operating with the modifications authorized by the Authority to Construct, you must submit an application to modify the Title V permit as an administrative amendment in accordance with District Rule 2520, Section 11.5. Application forms have been enclosed for your use. These forms may also be found on the District's website at [www.valleyair.org](http://www.valleyair.org).

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

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

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

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

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

Sincerely,



Arnaud Marjollet  
Director of Permit Services

Enclosures

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



Facility # N-3606  
PACIFIC SOUTHWEST CONTAINER  
ATTN: SR VICE PRESIDENT OF QUALITY & ENVIRONMENTAL MNGT  
4530 LECKRON RD  
MODESTO, CA 95357

## **AUTHORITY TO CONSTRUCT (ATC)**

### **QUICK START GUIDE**

1. **Pay Invoice:** Please pay enclosed invoice before due date.
2. **Modify Your Title V Permit.** Prior to operating the equipment authorized under this ATC, submit an application to modify your Title V permit. See application forms at <http://www.valleyair.org/busind/pto/ptoforms/1ptoforidx.htm>.
3. **Fully Understand ATC:** Make sure you understand ALL conditions in the ATC prior to construction, modification and/or operation.
4. **Follow ATC:** You must construct, modify and/or operate your equipment as specified on the ATC. Any unspecified changes may require a new ATC.
5. **Notify District:** You must notify the District's Compliance Department, at the telephone numbers below, upon start-up and/or operation under the ATC. Please record the date construction or modification commenced and the date the equipment began operation under the ATC. You may NOT operate your equipment until you have notified the District's Compliance Department. A startup inspection may be required prior to receiving your Permit to Operate.
6. **Source Test:** Schedule and perform any required source testing. See [http://www.valleyair.org/busind/comply/source\\_testing.htm](http://www.valleyair.org/busind/comply/source_testing.htm) for source testing resources.
7. **Maintain Records:** Maintain all records required by ATC. Records are reviewed during every inspection (or upon request) and must be retained for at least 5 years.

By operating in compliance, you are doing your part to improve air quality for all Valley residents.

**For assistance, please contact District Compliance staff at  
any of the telephone numbers listed below.**

Seyed Sadredin  
Executive Director/Air Pollution Control Officer

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Northern Region  
4800 Enterprise Way  
Modesto, CA 95356-8718  
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## AUTHORITY TO CONSTRUCT

**PERMIT NO:** N-3606-33-0

**ISSUANCE DATE:** 06/15/2016

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

**LOCATION:** 4530 LECKRON RD  
MODESTO, CA 95357

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

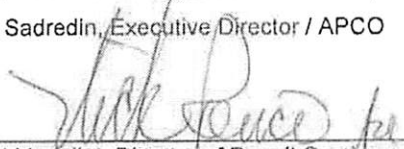
### CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
5. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. The permittee shall properly use and properly operate all graphic arts printing technologies as directed and/or specified by the manufacturer of the printer or graphic arts material. [District Rule 4607] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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

Seyed Sadredin, Executive Director / APCO

  
Arnaud Marjollet, Director of Permit Services

N-3606-33-0: Jun 15 2016 1:54PM - SOW - Joint Inspection NOT Required

6. Only flow coater, roll coater, dip coater, foam coater, die coater, hand application methods shall be used to apply coatings. HVLP spray equipment may be used for air dried coatings only. Application equipment shall be operated in accordance with the manufacturer's specifications. [District Rule 4607] Federally Enforceable Through Title V Permit
7. VOC emissions from this unit shall not exceed 130.0 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. VOC emissions from this unit shall not exceed 39,000 pounds on a rolling 12-month basis. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Total VOC emissions from all permitted graphic arts printing and corrugated board finishing operations in the facility shall not exceed 870 pounds in any one day. [District Rules 2201 and 4607] Federally Enforceable Through Title V Permit
10. Compliance with the daily VOC emissions limit shall be calculated as follows: Total daily VOC emissions = {[VOC Content (ink #1) x Daily usage (ink #1) x (1 - 0.95)] + ... + [VOC Content (ink #n) x Daily usage (ink #n) x (1 - 0.95)]} + {[VOC Content (fountain solution #1) x Daily usage (fountain solution #1)] + [VOC Content (wash primer #1) x Daily usage (wash primer #1)] + [VOC Content (cleanup solvent #1) x Daily usage (cleanup solvent #1)] + ... + [VOC Content (fountain solution #n) x Daily usage (fountain solution #n)] + [VOC Content (wash primer #n) x Daily usage (wash primer #n)] + [VOC Content (cleanup solvent #n) x Daily usage (cleanup solvent #n)]}. [District Rules 2201 and 4607] Federally Enforceable Through Title V Permit
11. Facility-wide VOC emissions shall not exceed 73,403 pounds on a rolling 12-month basis. [District Rule 2201] Federally Enforceable Through Title V Permit
12. VOC content of the materials shall not exceed any of the following limits: inks - less than 5% VOC by weight (less water and exempt compounds), or 2.5 lb/gallon (less water and exempt compounds, as applied); coatings - 2.5 lb/gallon (less water and exempt compounds, as applied); inks for high end graphics - less than 30% VOC by weight (less water and exempt compounds), or 2.5 lb/gallon (less water and exempt compounds, as applied); fountain solutions - less than 5.0% VOC by volume. [District Rules 2201 and 4607] Federally Enforceable Through Title V Permit
13. Permittee shall utilize organic solvents for cleaning operations that complied with the VOC content limit specified in Table 7 of District Rule 4607. [District Rule 4607] Federally Enforceable Through Title V Permit
14. For a permittee using any solvent containing more than 25 g/L of VOC for organic solvent cleaning, cleaning activities shall be by one of the following methods: wipe cleaning; application of solvent using nonpropellant-induced, hand-held spray bottles; non-atomized solvent flow method, or solvent flushing method. [District Rule 4607] Federally Enforceable Through Title V Permit
15. For a permittee using any solvent containing more than 25 g/L of VOC for organic solvent cleaning, solvent shall not be atomized into the open air unless it is vented to a VOC control device. This provision shall not apply to operations where roller or blanket wash is applied automatically and the cleaning of the nozzle tips of automated spray equipment systems, except for robotic systems, and cleaning with nonpropellant-induced, hand-held spray bottles. [District Rule 4607] Federally Enforceable Through Title V Permit
16. For a permittee using any solvent containing more than 25 g/L of VOC for organic solvent cleaning, the permittee shall not use VOC-containing material to clean spray equipment used for the application of coatings, adhesives, or ink, unless an enclosed system or equipment that is proven to be equally effective at controlling emissions is used for cleaning. If an enclosed system is used, it must totally enclose component part(s) being cleaned during washing, rinsing, draining procedures and it must be used according to manufacturer's recommendations and must be closed when not in use. [District Rule 4607] Federally Enforceable Through Title V Permit
17. Permittee shall store and dispose of fresh or spent solvents and waste solvent cleaning materials such as cloth, paper, etc. in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing material or when it is empty. [District Rules 4607 and 4663] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

18. Permittee shall maintain a current file of coatings, inks, adhesives, fountain solutions, wash primers, and solvents in use and in storage. The file shall include safety data sheet (SDS) or product data sheet showing the material name, manufacturer's name, VOC content as applied, mixing instruction, and density. [District Rule 4607] Federally Enforceable Through Title V Permit
19. Monthly records shall be maintained and contain the following information: (a) The name, type, quantity and VOC content (in lb/gal, less water and exempt compounds) of all inks, fountain solutions, wash primers, coatings, adhesives, solvents, and cleaning materials used or stored at the facility; (b) The combined total amount of VOC's emitted from the use of all VOC containing material (in pounds); (c) The dates of operation of this permit unit. [District Rules 2201 and 4607] Federally Enforceable Through Title V Permit
20. Permittee shall maintain a current list of solvents that are in use at the stationary source. The list shall include the following information: (1) the name of the solvent and its manufacturer; (2) the VOC content of each solvent expressed in grams/liter or lb/gal; (3) when the solvent is a mixture of different materials that are blended by the operator, the mix ratio of the batch shall be recorded and the VOC content of the batch shall be calculated and recorded in order to determine compliance with the specified limits of VOC content, as applied; (4) the type of cleaning activity for each solvent that is being used at the stationary source in accordance with the applicable cleaning category specified in Table 1 of this rule; (5) the daily quantity of solvents used in solvent cleaning operations. [District Rule 4663] Federally Enforceable Through Title V Permit
21. Records of the daily VOC emissions from this unit shall be kept. Daily VOC emissions may be calculated from the monthly materials (inks, coatings, solvents, fountain solutions, wash primers, etc.) usage records and the number of days per calendar month this unit was operated. [District Rule 2201] Federally Enforceable Through Title V Permit
22. Record of the total daily VOC emissions from all permitted graphic arts printing and corrugated board finishing operations in the facility shall be kept. [District Rules 2201 and 4607] Federally Enforceable Through Title V Permit
23. Record of the VOC emissions from this unit, on a rolling 12-month basis, shall be kept. The record shall be updated at least monthly. [District Rule 2201] Federally Enforceable Through Title V Permit
24. Record of the facility-wide VOC emissions, on a rolling 12-month basis, shall be kept. The record shall be updated at least monthly. [District Rule 2201] Federally Enforceable Through Title V Permit
25. All records shall be maintained for a period of at least five years and shall be made available to the District, ARB and EPA inspection upon request. [District Rules 2201, 4607 and 4663] Federally Enforceable Through Title V Permit