

JUL 11 2017

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

**Re: Final - Authority to Construct / Certificate of Conformity (Significant Mod)
District Facility # N-3606, Project # N-1170908**

Dear Mr. McCullough:

The Air Pollution Control Officer has issued Authority to Construct (ATC) N-3606-35-0 with a Certificate of Conformity to Pacific Southwest Container LLC at 4530 Leckron Road, Modesto, California. The proposed project is to relocate flexographic printing press with folder and gluer from Pacific Southwest Container's Stockton facility N-7464 to Pacific Southwest Container's Modesto facility N-3606.

Enclosed are the ATC 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 ATC was published on May 25, 2017. The District's analysis of the proposal was also sent to CARB and US EPA Region IX on May 22, 2017. No comments were received following the District's preliminary decision on this project.

Prior to operating with the modifications authorized by the ATC, 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 are found on the District's website at www.valleyair.org/permits/TVforms.

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

Seyed Sadredin
Executive Director/Air Pollution Control Officer

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

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

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



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/1ptoformidx.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 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. Sample record keeping forms can be found at http://www.valleyair.org/busind/comply/compliance_forms.htm.

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.**

Debra E. Burrell
Executive Director/Air Pollution Control Officer

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

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

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34946 Flyover Court
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Tel: 661-392-5500 FAX: 661-392-5585



AUTHORITY TO CONSTRUCT

PERMIT NO: N-3606-35-0

ISSUANCE DATE: 07/11/2017

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 4-COLOR BOBST/MARTIN MODEL MIDLINE 924 (A-0498-200) NON-HEATSET FLEXOGRAPHIC PRINTER WITH FOLDER, GLUER, AND ROTARY DIE-CUTTER

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. Upon implementation of this Authority to Construct, Permit to Operate N-7464-1 shall be cancelled. [District Rule 2201] Federally Enforceable Through Title V Permit
4. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
5. No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (02/17/05). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101, and County Rules 401 (in all eight counties in the San Joaquin Valley)] 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 Marjolle, Director of Permit Services

N-3606-35-0 : Jul 11 2017 3:41PM - KAHLOJ : Joint Inspection NOT Required

6. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. 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 Rules 2201 and 4607] Federally Enforceable Through Title V Permit
7. VOC emissions from this permit unit shall not exceed any of the following limits: 30 lb/day and 7,800 lb/year (12-month rolling total). [District Rule 2201] Federally Enforceable Through Title V Permit
8. Facility-wide VOC emissions shall not exceed 73,403 lb/year on a rolling 12-month basis. [District Rule 2201] Federally Enforceable Through Title V Permit
9. 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
10. VOC content of the materials shall not exceed the following: (a) For standard graphics printing, use inks with a VOC content of less than or equal to 0.3 lb/gal (less water and exempt compounds); (b). For high end graphics printing, use inks with a VOC content of less than or equal to 0.88 lb/gal (less water and exempt compounds); (c) For high end graphics printing with metallic inks, use inks with a VOC content of less than or equal to 2.5 lb/gal (less water and exempt compounds); (d) Adhesive with a VOC content of less than or equal to 0.021 lb/gal (less water and exempt compounds); (e) Fountain solutions - 8.0% by volume. The use of specialty inks shall not exceed 2 gallons in a calendar day and 120 gallons in a calendar year. [District Rules 2201, 4607 and 4653] Federally Enforceable Through Title V Permit
11. 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
12. 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
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 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
14. 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
15. Permittee shall store or dispose of fresh or spent solvents, waste solvent cleaning materials, coatings, adhesives, catalysts, thinners, and inks in closed, non-absorbent, non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4607] Federally Enforceable Through Title V Permit
16. 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, density, and composite vapor pressure. [District Rule 4607] Federally Enforceable Through Title V Permit
17. 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. A daily record of the type and amount of flexographic specialty inks used shall be maintained. [District Rules 2201 and 4607] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

18. Permittee shall maintain records of the daily VOC emissions in pounds from this permit unit. Daily VOC emissions may be calculated from the monthly materials (inks, coatings, solvents, fountain solutions, wash primers, adhesives, etc.) usage records and the number of days per calendar month this unit was operated. [District Rule 2201] Federally Enforceable Through Title V Permit
19. On a monthly basis, the permittee shall calculate and record the monthly VOC emissions in pounds from this permit unit. [District Rule 2201] Federally Enforceable Through Title V Permit
20. On a monthly basis, the permittee shall calculate and record the annual VOC emissions in pounds by summing the VOC emissions from the previous 12 months. [District Rule 2201] Federally Enforceable Through Title V Permit
21. On a monthly basis, the permittee shall calculate and record the facility-wide VOC emissions in pounds for the rolling 12-month period. The facility-wide VOC emissions shall be calculated by summing the VOC emissions from the previous 12 months from every permitted unit at this facility. [District Rule 2201] Federally Enforceable Through Title V Permit
22. All records shall be maintained for a period of at least five years and shall be made available to the District, ARB and EPA upon request. [District Rules 2201 and 4607] Federally Enforceable Through Title V Permit