

**JAN 17 2019**

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

**RE: Notice of Final Action - Authority to Construct**  
**Facility Number: N-8044**  
**Project Number: N-1183218**

Dear Mr. McCullough:

The Air Pollution Control Officer has issued the Authority to Construct permit to Pacific Southwest Container, LLC for the installation of a non-heatset flexographic printing operation, at 671 Mariposa Road in Modesto, California. Enclosed are the Authority to Construct permit 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 November 27, 2018. The District's analysis of the proposal was also sent to CARB on November 20, 2018. No comments were received following the District's preliminary decision on this project.

Also enclosed is an invoice for the engineering evaluation fees pursuant to District Rule 3010. Please remit the amount owed, along with a copy of the attached invoice, within 60 days.

**Samir Sheikh**  
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 at (209) 557-6400.

Sincerely,

A handwritten signature in blue ink, appearing to read "Arnaud Marjollet". The signature is written in a cursive style and is positioned above a horizontal line.

Arnaud Marjollet  
Director of Permit Services

AM:WMS

Enclosures

cc: Tung Le, CARB (w/enclosure) via email



Facility # N-8044  
PACIFIC SOUTHWEST CONTAINER, LLC  
4530 LECKRON RD  
MODESTO, CA 95357

## AUTHORITY TO CONSTRUCT (ATC)

### QUICK START GUIDE

1. **Pay Invoice:** Please pay enclosed invoice before due date.
2. **Fully Understand ATC:** Make sure you understand ALL conditions in the ATC prior to construction, modification and/or operation.
3. **Follow ATC:** You must construct, modify and/or operate your equipment as specified on the ATC. Any unspecified changes may require a new ATC.
4. **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.
5. **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.
6. **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](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.**

**Samir Sheikh**

Executive Director/Air Pollution Control Officer

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## AUTHORITY TO CONSTRUCT

**PERMIT NO:** N-8044-8-0

**ISSUANCE DATE:** 01/14/2019

**LEGAL OWNER OR OPERATOR:** PACIFIC SOUTHWEST CONTAINER, LLC

**MAILING ADDRESS:** 4530 LECKRON RD  
MODESTO, CA 95357

**LOCATION:** 671 MARIPOSA ROAD  
MODESTO, CA

**EQUIPMENT DESCRIPTION:**

GRAPHIC ARTS PRINTING OPERATION CONSISTING OF A 4-COLOR BOBST MODEL FFG 924 NT RAPIDSET NON-HEATSET FLEXOGRAPHIC PRINTER WITH FOLDER, GLUER, AND ROTARY DIE-CUTTER

## CONDITIONS

1. Prior to operating equipment under this Authority to Construct, permittee shall surrender VOC emission reduction credits for the following quantity of emissions: 1st quarter - 1,120 lb, 2nd quarter - 1,120 lb, 3rd quarter - 1,120 lb, and 4th quarter - 1,121 lb. These amounts include the applicable offset ratio specified in Rule 2201 Section 4.8 for the ERC specified below. [District Rule 2201]
2. ERC Certificate Number S-5013-1 (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 District Rule 2520 - Federal Mandated Operating Permits within twelve months of commencing operation of this permit unit, or comply with District Rule 2530 - Federally Enforceable Potential to Emit. [District Rule 2520]
4. 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]

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.

Samir Sheikh, Executive Director / APCO

  
Arnaud Marjollet, Director of Permit Services

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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]
7. VOC emissions from this permit unit shall not exceed 19.6 pounds in any one day. [District Rule 2201]
8. VOC emissions from this permit unit shall not exceed 4,900 pounds on a rolling 12-month basis. [District Rule 2201]
9. VOC content of the materials shall not exceed the following: (a) For Low-End 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) For coatings, use coatings with a VOC content of less than or equal to 2.5 lb/gal (less water and exempt compounds); (e) Use of adhesive with no VOC content; and (f) Use of fountain solutions (if applicable) with up to 8.0% VOC 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]
10. High-End Graphics print jobs are print jobs that require any of the following: a glossy finish, multiple colors, highly refined graphic image, or very high letter-quality printing. [District Rule 2201]
11. Low-End Graphics print jobs are print jobs that do not qualify as High-End Graphic print jobs. [District Rule 2201]
12. 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]
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]
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]
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]
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]
17. 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]
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, density, and composite vapor pressure. [District Rule 4607]
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. A daily record of the type and amount of flexographic specialty inks used shall be maintained. [District Rules 2201 and 4607]

CONDITIONS CONTINUE ON NEXT PAGE

20. 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, adhesives, etc.) usage records and the number of days per calendar month this unit was operated. [District Rule 2201]
21. Records 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]
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]