



September 8, 2021

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

Re: Notice of Preliminary Decision - Federally Mandated Operating Permit

Facility Number: N-8044 Project Number: N-1193264

Dear Mr. McCullough:

Enclosed for your review is the District's analysis of Pacific Southwest Container, LLC's application for the Federally Mandated Operating Permit for its operation at 671 Mariposa Rd, Modesto, California.

The notice of preliminary decision for this project has been posted on the District's website (www.valleyair.org). After addressing all comments made during the 30-day public notice and the 45-day EPA comment periods, the District intends to issue the Federally Mandated Operating Permit. 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, please contact Mr. Errol Villegas, Permit Services Manager, at (559) 230-5900.

Sincerely,

**Brian Clements** 

**Director of Permit Services** 

**Enclosures** 

CC: Courtney Graham, CARB (w/enclosure) via email Laura Yannayon, EPA (w/enclosure) via EPS CC:

> Samir Sheikh Executive Director/Air Pollution Control Officer

# SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT

# **Pacific Southwest Container**

# PROPOSED ENGINEERING EVALUATION TABLE OF CONTENTS

SEC	TION	PAGE
I.	PROPOSAL	2
II.	FACILITY LOCATION	2
III.	EQUIPMENT LISTING	2
IV.	GENERAL PERMIT TEMPLATE USAGE	3
V.	SCOPE OF EPA AND PUBLIC REVIEW	3
VI.	APPLICABLE REQUIREMENTS ADDRESSED BY A GENERAL PERMIT TEMPLATE	3
VII.	APPLICABLE REQUIREMENTS NOT ADDRESSED BY A GENERAL PERMIT TEMPLATE	3
VIII.	REQUIREMENTS NOT FEDERALLY ENFORCEABLE	5
IX.	COMPLIANCE	6
Χ.	PERMIT SHIELD	43
XI.	PERMIT CONDITIONS	43
ATTA	ACHMENT A - DETAILED FACILITY PRINTOUT ACHMENT B - EXEMPT EQUIPMENT ACHMENT C - SJVUAPCD PERMITS ACHMENT D - SUMMARY OF HAP EMISSIONS	

# TITLE V APPLICATION REVIEW

Project #: N-1193264

Deemed Complete: September 17, 2019

Engineer: Mohamed Muthana Date: September 7, 2021

Facility Number: N-8044

Facility Name: Pacific Southwest Container, LLC

Mailing Address: 4530 Leckron Rd

Modesto, CA 95357

Contact Name: Mac McCullough

Phone: (209) 526-0444

Responsible Official: Mac McCullough

Title: Senior VP Quality & Environmental Manager

#### I. PROPOSAL

Pacific Southwest Container, LLC. Is proposing that an initial Title V permit be issued for its existing paper product manufacturing facility in Modesto, CA. The purpose of this evaluation is to identify all applicable requirements, determine if the facility will comply with those applicable requirements, and to provide the legal and factual basis for proposed permit conditions.

### II. FACILITY LOCATION

The paper product manufacturing facility is located at 671 Mariposa Rd in Modesto, in Stanislaus County, CA.

### III. EQUIPMENT LISTING

A detailed facility printout listing all permitted equipment at the facility is shown in Attachment A.

A summary of the exempt equipment categories which describe the insignificant activities or equipment at the facility not requiring a permit is shown in Attachment B. This equipment is not exempt from facility-wide requirements.

#### IV. GENERAL PERMIT TEMPLATE USAGE

The applicant has chosen to not use any model general permit templates.

### V. SCOPE OF EPA AND PUBLIC REVIEW

The applicant has not requested to utilize any model general permit templates. Therefore, the proposed permit in its entirety is subject to EPA and public review.

# VI. APPLICABLE REQUIREMENTS ADDRESSED BY GENERAL PERMIT TEMPLATES

The applicant has not proposed to utilize any model general permit templates. All applicable requirements are explicitly addressed in the permit outside of the general permit templates.

# VII. APPLICABLE REQUIREMENTS NOT ADDRESSED BY GENERAL PERMIT TEMPLATES

District Rule 1070, Inspections, (amended December 17, 1992)

District Rule 1081, Source Sampling, (amended December 16, 1993)

District Rule 1100, Equipment Breakdown, (amended December 17, 1992)

District Rule 1160, Emission Statements, (adopted November 18, 1992)

District Rule 2010, Permits Required, (amended December 17, 1992)

District Rule 2020, Exemptions, (amended December 18, 2014)

District Rule 2031, Transfer of Permits (amended December 17, 1992)

District Rule 2040, Applications, (amended December 17, 1992)

District Rule 2070, <u>Standards for Granting Applications</u> (amended December 17, 1992)

District Rule 2080, Conditional Approval, (amended December 17, 1992)

- District Rule 2201, <u>District New and Modified Stationary Source Review Rule</u>, (amended August 15, 2019)
- District Rule 2520, <u>Federally Mandated Operating Permits</u>, (amended August 15, 2019)
- District Rule 4101, Visible Emissions, (amended December 17, 2005)
- District Rule 4201, <u>Particulate Matter Concentration</u>, (amended December 17, 1992)
- District Rule 4305, <u>Boilers, Steam Generators, and Process Heaters Phase 2,</u> (amended August 21, 2003)
- District Rule 4306, <u>Boilers, Steam Generators, and Process Heaters Phase 3</u>, (amended December 17, 2020)
- District Rule 4320, Advanced Emission Reduction Options for Boilers, Steam Generators, and Process Heaters Greater than 5.0 MMBTU/HR, (amended December 17, 2020)
- District Rule 4601, Architectural Coatings, (amended April 16, 2020)
- District Rule 4607, Graphic Arts and Paper, Film, Foil and Fabric Coatings, (amended December 18, 2008)
- District Rule 4653, Adhesives and Sealants, (amended September 16, 2010)
- District Rule 4702, Internal Combustion Engines (amended August 19, 2021)
- District Rule 4801, Sulfur Compounds, (amended December 17, 1992) (Non SIP replacement for Kern County Rule 407)
- District Rules 8021, 8031, 8041, 8051, and 8061, <u>Fugitive Dust (PM<sub>10</sub>) Emissions</u> (as amended August 19, 2004)
- District Rule 8071, Fugitive Dust (PM<sub>10</sub>) Emissions, (as amended Sept. 16, 2004)
- 40 CFR Part 60, Subpart Dc, <u>Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units</u>, (as amended February 16, 2012)

- 40 CFR Part 60, Subpart IIII, <u>Standards of Performance for Stationary</u>
  <u>Compression Ignition Internal Combustion Engines (as amended June 29, 2021)</u>
- 40 CFR 61, Subpart M, <u>National Emission Standard for Asbestos</u>, (amended July 20, 2004)
- 40 CFR Part 63, Subpart KK, <u>National Emission Standards for the Printing and</u>
  Publishing Industry (amended November 19, 2020)
- 40 CFR Part 63, Subpart ZZZZ, National Emissions Standards for Hazardous Air
  Pollutants for Stationary Reciprocating Internal Combustion
  Engines (amended August 15, 2014)
- 40 CFR 63 Subpart DDDD, National Emission Standards for Hazardous Air
  Pollutants for Major Sources: Industrial, Commercial, and
  Institutional Boilers and Process Heaters (amended 11/20/15)
- 40 CFR Part 63, Subpart JJJJJ, <u>National Emission Standards for Hazardous Air</u>

  <u>Pollutants for Industrial, Commercial, and Institutional</u>

  <u>Boilers Area Sources</u> (amended September 14, 2016)
- 40 CFR Part 82, Subpart B and F, Stratospheric Ozone
- 40 CFR Part 64, Compliance Assurance Monitoring

#### VIII. REQUIREMENTS NOT FEDERALLY ENFORCEABLE

For each Title V source, the District issues a single permit that contains the Federally Enforceable requirements, as well as the District-only requirements. The District-only requirements are not a part of the Title V Operating Permits. The terms and conditions that are part of the facility's Title V permit are designated as Federally Enforceable through Title V Permit.

This facility is subject to the following rules that are not currently federally enforceable:

- 1. District Rule 1100, <u>Equipment Breakdown</u> (amended December 17,1992)
- 2. District Rule 4102, Nuisance (amended December 17, 1992)

3. Title 17 CCR, Section 93115, Airborne Toxic Control Measure (ATCM) for Stationary Compression-Ignition (CI) Engines

The Purpose of this ATCM is to protect public health by controlling particulate matter (PM) and criteria pollutant emissions from stationary diesel fueled portable engines rated at 50 horsepower and greater operating in California. All applicable requirements for this ATCM are satisfied via District Rule 4702 and 40 CFR 60 subpart IIII. No additional compliance determination is needed.

The following permit conditions are soley enforced by District Rule 4102 and are not Federally Enforceable through Title V:

Permit Unit	Permit Conditions
N-8044-2-1	1 and 3
N-8044-3-1	1
N-8044-4-2	1
N-8044-5-1	1
N-8044-6-2	1
N-8044-7-1	1
N-8044-8-1	1
N-8044-9-1	1
N-8044-10-1	1
N-8044-11-1	1

#### IX. COMPLIANCE

A. Requirements Addressed by Model General Permit Templates

The applicant has not proposed to utilize any model general permit templates. All applicable requirements are explicitly addressed in the permit outside of the general permit templates.

B. Requirements Not Addressed by Model General Permit Templates

#### 1. District Rule 1070, <u>Inspections</u>

 a. 29.47 MMBtu/hr natural gas-fired boiler equipped with a low NOx burner and a Selective Catalytic Reduction (SCR) system (N-8044-4-2)

- b. Starch receiving and storage operation (N-8044-6-1)
- c. Corrugated cardboard manufacturing operation (N-8044-7-1)

This rule applies to any source operation which emits or may emit air contaminants. It explains the Districts authority in determining compliance applicable rules and regulations. The District has the authority to require recordkeeping, to make inspections and to conduct tests of air pollution sources.

The following conditions on the draft permit will serve as a mechanism to ensure compliance with the requirements of this rule:

Permit Unit	Permit Conditions
N-8044-4-2	36
N-8044-6-2	17
N-8044-7-1	11

#### 2. District Rule 1081, Source Sampling

 a. 29.47 MMBtu/hr natural gas-fired boiler equipped with a low NOx burner and a Selective Catalytic Reduction (SCR) system (N-8044-4-2)

This rule grants the APCO the authority to request the installation, use maintenance, and inspection of continuous emission monitoring equipment. The general, source, and pollutant specific requirements for continuous emission monitoring equipment (CEM) are defined. This rule also specifies the performance standards for the equipment and administrative recordkeeping, reporting, and violation and equipment breakdown notification requirements.

Section 6.3 requires that calibration gas mixtures shall meet the specifications in 40 CFR, Part 51, Appendix P, Section 3.3, and Part 60, Appendix B, Performance Specification 2, Section 2.1, or shall meet equivalent specifications established by mutual agreement of the District, the ARB and the Environmental Protection Agency.

Section 6.4 requires that cycling times shall be those specified in 40 CFR, Part 51, Appendix P, Sections 3.4, 3.4.1 and 3.4.2, or shall meet equivalent specifications established by mutual agreement of the District, the ARB and the Environmental Protection Agency.

Section 6.5 requires that the continuous  $SO_2$  and  $NO_x$  monitors meet the applicable performance specification requirements in 40 CFR, Part 51, Appendix P, and Part 60, Appendix B, or shall meet equivalent specifications established by mutual agreement of the District, the ARB, and the Environmental Protection Agency.

Section 6.6 requires that the continuous CO<sub>2</sub> and O<sub>2</sub> monitoring system shall meet the performance specification requirements in 40 CFR, Part 51, Appendix P, and Part 60, Appendix B, or shall meet equivalent specifications established by mutual agreement of the District, the ARB, and the Environmental Protection Agency.

Section 6.7 requires that the continuous opacity monitoring system shall meet the performance specification requirements in 40 CFR, Part 51, Appendix P, and Part 60, Appendix B, or shall meet equivalent specifications established by mutual agreement of the District, the ARB, and the Environmental Protection Agency.

Section 7.1 requires that a person operating or using a stackmonitoring system shall, upon written notice from the APCO, provide a summary of the data obtained from such systems. This summary of data shall be in the form and the manner prescribed by the APCO.

Section 7.2 requires that data shall be reduced according to the procedure established in 40 CFR, Part 51, Appendix P, paragraphs 5.0 through 5.3.3, or by other methods deemed equivalent by mutual agreement of the District, the ARB and the Environmental Protection Agency.

Section 7.3 requires that records from the monitoring equipment shall be kept by the owner for a period of two (2) years. The records shall be in permanent form, shall be suitable for inspection and shall be made available to the ARB and the District upon request. The records shall at a minimum include:

- 7.3.1 The occurrence and duration of any start-up, shutdown or malfunction in the operation of any affected facility;
- 7.3.2 Performance testing, evaluations, calibrations, checks, adjustments and maintenance of any continuous emission monitors that have been installed pursuant to this rule; and
- 7.3.3 Emission measurements.

Section 8.0 requires that owners or operators subject to Section 4.0 shall submit a written report for each calendar quarter to the APCO. The report is due by the 30<sup>th</sup> day following the end of the calendar quarter and shall include:

- 8.1 Time intervals, data and magnitude of excess emissions, nature and cause of the excess (if known), corrective actions taken and preventive measures adopted.
- 8.2 Averaging period used for data reporting corresponding to averaging period specified in the emission test period used to determine compliance with an emission standard for the pollutant/source category in question.
- 8.3 Time and date of each period during which the continuous monitoring system was inoperative, except for zero and span checks, and the nature of system repairs and adjustments.
- 8.4 A negative declaration when no excess emissions occurred.
- 8.5 Reports on opacity monitors giving the number of three (3) minute periods during which the average opacity exceeded the standard for each hour of operation. The averages may be obtained by integration over the averaging period or by arithmetically averaging a minimum of four (4) equally spaced instantaneous opacity measurements per minute. Any time period exempted shall be considered before determining the excess averages of opacity.

Section 9.0 requires that a violation of emission standards of these rules, as shown by the stack-monitoring system, shall be reported by such person to the Air Pollution Control Officer within 96 hours.

Section 10.0 requires that in the event of a breakdown of monitoring equipment, the owner shall notify the APCO as soon as reasonably possible, but no later than eight (8) hours after its detection, unless the owner or operator demonstrates to the APCO's satisfaction that a longer reporting period was necessary, and shall initiate repairs. The owner shall inform the APCO of the intent to shut down any monitoring equipment at least 24 hours prior to the event.

Section 11.0 requires that the APCO or an authorized representative shall inspect, as he determines to be necessary, the monitoring devices required by this rule to ensure that such devices are functioning properly.

The following conditions on the draft permit will serve as a mechanism to ensure compliance with the requirements of this rule:

Permit Unit	Permit Conditions
N-8044-4-2	18, 27

### 3. District Rule 1100, Equipment Breakdown

# a. Facility-wide (N-8044-0-0)

District Rule 1100 has been submitted to the EPA to replace the SIP approved 110 County APCD Rule 1100. District Rule 1100 is at least as stringent as the Stanislaus County Rule addressing breakdowns, as is evident in the comparison on below in table 1:

Table 1. Comparison of District Rule 1100 to County Rule

REQUIREMENTS	District Rule 1100	Rule 110 (Stanislaus)
A breakdown occurrence must be reported as soon as reasonably possible as but no later than 1 hour after detection.	X	X
A variance must be obtained if the occurrence will last longer than a production run or 24 hours, whichever is shorter (96 hours for CEM systems).	Х	Х
A report must be submitted to the APCO within 10 days of the correction of the breakdown occurrence which includes:	X	X
<ol> <li>A statement that the breakdown condition has been corrected, together with the date of correction and proof of compliance.</li> </ol>	X	X
2) A specific statement of the reason(s) or cause(s) for the occurrence sufficient to enable the APCO to determine whether the occurrence was a breakdown condition.	X	X
A description of the corrective measures     undertaken and/or to be undertaken to     avoid such an occurrence in the future.	Х	
<ol> <li>Pictures of the equipment or controls which failed if available.</li> </ol>	X	

Section 6.1 requires the owner or operator to notify the APCO of any occurrence which constitutes a breakdown condition; the notification should include time, location, and equipment involved and to the extent known the cause of the occurrence. Such notification should be a given as soon as reasonably possible, but no later than one hour after detection, unless the owner or operator demonstrates to the APCO that the longer reporting period was necessary.

Section 7.0 requires the owner or operator to submit the APCO a written report within ten days of any occurrence that constitutes a breakdown condition. The report should include time, location, equipment involved, cause of the occurrence, estimated emissions in excess of those allowed, and methods utilized to restore normal operation.

The following conditions on the draft permit will serve as a mechanism to ensure compliance with the requirements of this rule:

Permit Unit	Permit Conditions
N-8044-0-0	1, 2, and 11

#### 4. District Rule 1160, Emission Statements

#### a. Facility-wide (N-8044-0-0)

Section 5.0 requires the owner or operator of any stationary source to provide the District with a written emission statement showing actual emissions of reactive organic gases (ROGs) and nitrogen oxides (NOx) from that source. The District waives this requirement for sources emitting less than 25 tons per year of these pollutants if the District provides the Air Resources Board (ARB) with an emission inventory of sources emitting greater than 10 tons per year of NOx or ROGs based on the use of emission factors acceptable to the ARB.

The following condition on the draft permit will serve as a mechanism to ensure compliance with the requirements of this rule:

Permit Unit	Permit Condition
N-8044-0-0	3

# 5. District Rule 2010 , <u>Permits Required</u> District Rule 2020, <u>Exemptions</u>

#### a. Facility-wide (N-8044-0-0)

District Rule 2010 sections 3.0 and 4.0 require any person building, modifying or replacing any operation that may cause the issuance of air contaminants to apply for an Authority to Construct (ATC) from the District in advance. The ATC will remain in effect until the Permit to Operate (PTO) is granted.

District Rule 2020 lists equipment, which are specifically exempt from obtaining permits and specifies recordkeeping requirements to verify such exemptions.

The following condition on the draft permit will serve as a mechanism to ensure compliance with the requirements of these rules:

Permit Unit	Permit Condition
N-8044-0-0	4

# 6. District Rule 2031, <u>Transfer of Permits</u> District Rule 2070, <u>Standards for Granting Applications</u> District Rule 2080, Conditional Approval

#### a. Facility-wide (N-8044-0-0)

These rules set forth requirements to comply with all conditions of the Permit to Operate. Permits to Operate or Authorities to Construct are not transferable unless a new application is filed with and approved by the District. All source operations must be constructed and operated as specified in the Authority to Construct.

The following conditions on the draft permit will serve as a mechanism to ensure compliance with the requirements of these rules:

Permit Unit	Permit Conditions
N-8044-0-0	5 and 6

### 7. District Rule 2040, Applications

a. Facility-wide (N-8044-0-0)

Section 3.0 requires that every application for a permit shall be filed in a manner and form prescribed by the District.

The following condition on the draft permit will serve as a mechanism to ensure compliance with the requirements of this rule:

Permit Unit	Permit Condition
N-8044-0-0	7

# 8. District Rule 2201 New and Modified Stationary Source Review Rule(District NSR Rule)

- a. 305 bhp diesel fired Tier 3 emergency IC engine powering a fire pump (N-8044-2-1)
- b. 29.47 MMBtu/hr natural gas-fired boiler equipped with a low NOx burner and a Selective Catalytic Reduction (SCR) system (N-8044-4-2)
- c. Graphic arts printing operations consisting of flexographic printers (N-8044-3-1, -5-1, and -8-1 through -11-1)
- d. Starch receiving and storage operation (N-8044-6-1)
- e. Corrugated cardboard manufacturing operation (N-8044-7-1)

District Rule 2201 applies to new and modifying stationary sources that require a District permit. District Rule 2201 was last amended on August 15, 2019. This initial Title V permit does not constitute a modification per Section 3.25 of the rule. Therefore, the updated requirements of this rule are not applicable at this time.

Conditions from the current Permits to Operate (PTOs) are incorporated into the proposed Title V permit as stated in the following table:

Permit Unit	Permit Conditions
N-8044-2-1	4,6, and 7
N-8044-3-1	2, 3, 5 – 7, and 14 - 18
N-8044-4-2	3 -16, 18, 22, 35
N-8044-5-1	2 – 6, 12, and 14 - 17
N-8044-6-2	2, 4 - 17
N-8044-7-1	2 - 11
N-8044-8-1	2 – 7, 13, and 15 - 18
N-8044-9-1	2 – 7, and 15 - 20
N-8044-10-1	2 – 7, and 15 - 20
N-8044-11-1	2 – 7, and 15 - 20

### 9. District Rule 2520, <u>Federally Mandated Operating Permits</u>

#### a. Facility-wide (N-8044-0-0)

Section 5.2 requires that permittees submit applications for Title V permit renewal at least six months prior to permit expiration. Condition 36 of the facility wide requirements (N-8044-0-0) assures compliance with this requirement.

Section 9.0 of District Rule 2520 requires certain elements to be contained in each Title V permit:

Section 9.1.1 of District Rule 2520 requires all conditions on Title V permits specify a reference of the origin of an authority for each term or condition, and identify any difference in form as compared to the applicable requirements upon which the term or condition is based.

Section 9.4 contains requirements to incorporate all applicable recordkeeping requirements into the Title V permit, specific records of any required monitoring, and the retention of all required monitoring data and support information for five years. The requirements to keep specific monitoring records and retain records for five years are stated in condition 8 and 9 of the facility wide requirements (N-8044-0-0).

Section 9.5 contains requirements for the submittal of reports of monitoring at least every six months and prompt reporting of deviations from permitting requirements, including those attributable to upset conditions. The responsible official must certify all required reports.

These requirements are stated in permit conditions 10 and 11 of the facility wide requirements (N-8044-0-0).

Section 9.7 states that the Title V permit must also contain a severability clause in case of a court challenge; the severability clause is stated in permit condition 12 of the facility wide requirements (N-8044-0-0).

Section 9.8 contains requirements for provisions in the Title V permit stating 1) that the permittee must comply with all permit conditions; 2) that the permitted activity would have to be reduced to comply with the permit conditions should not be a defense in an enforcement action, 3) that the permit may be revoked, modified, reissued, or reopened for cause, 4) that the Title V permit does not reflect any property rights, and 5) that the permittee will furnish the District with any requested information to determine compliance with the conditions of the Title V permit. Compliance with these sections of Rule 2520 will be assured by permit conditions 5 and 13 – 16 of the facility wide requirements (N-8044-0-0).

Section 9.9 contains the requirement to provide in the permit that the permittee pay annual permit fees and applicable fees from District Rules 3010, 3030, 3050, 3080, 3090, 3110, and 3120. This requirement is stated in condition 17 of the facility wide requirements (N-8044-0-0).

Section 9.13.1 requires any report or document submitted under a permit requirement or a request for information by the District or EPA shall contain a certification by a responsible official to truth, accuracy, and completeness. Compliance with this section will be assured by permit condition 26 of the facility wide requirements (N-8044-0-0).

Section 9.13.2 contains inspection and entry requirements that allows an authorized representative of the District to enter a permittee's premises to inspect equipment, operations, work practices, permits on file, and to sample substances or monitor parameters for the purpose of assuring compliance with the permit requirements. Compliance with this section will be assured by permit conditions 18, 19, 20 and 21 of the facility wide requirements (N-8044-0-0).

Section 9.16 requires that the permittee submit certification of compliance with the terms and standards of Title V permits to the EPA and the District annually (or more frequently as required by the applicable requirement or the District). Condition 36 of the facility wide requirements (N-8044-0-0) assures compliance with this requirement.

Section 10.0 requires any application form, report, or compliance certification submitted pursuant to these regulations shall contain certification of truth accuracy, and completeness by a responsible official. Compliance with this section will be assured by permit condition 26 of the facility wide requirements (N-8044-0-0).

### 10. District Rule 4101, Visible Emissions

a. Facility-wide (N-8044-0-0)

Section 5.0 prohibits the discharge of any air contaminant for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker in shade as that designated as No.1 on the Ringlemann Chart; or is of such opacity as to obscure an observer's view to a degree equal to or greater than 20% opacity.

The following condition on the draft permit will serve as a mechanism to ensure compliance with the requirements of this rule:

Permit Unit	Permit Condition
N-8044-0-0	22

#### 11. District Rule 4201, Particulate Matter Concentration

Section 3.0 prohibits the discharge into the atmosphere of dust, fumes, or total suspended particulate matter from any single source operation in excess of 0.1 grain per cubic foot of gas at dry standard conditions.

a. 305 bhp diesel fired Tier 3 emergency IC engine powering a fire pump (N-8044-2-1)

Per the CAPCOA/CARB/EPA IX Title V Periodic Monitoring Recommendations memo, dated July 2001, diesel-fired emergency IC engines do not need to be source tested for compliance with the District's grain loading limit of 0.1 grain/dscf as long as the following conditions are in the Permit to Operate:

- 1) Engine usage is limited to maintenance, testing, and time of actual unforeseen emergencies.
- 2) Usage for maintenance and testing is not to exceed 200 hours per year.
- 3) Maintain records of all engine usage and maintenance.

The following condition on the draft permit will serve as a mechanism to ensure compliance with the requirements of this rule:

Permit Unit	Permit Condition
N-8044-2-1	1

 b. 29.47 MMBtu/hr natural gas-fired boiler equipped with a low NOx burner and a Selective Catalytic Reduction (SCR) system (N-8044-4-2)

Compliance with District Rule 4201 limits can be shown as follows:

NATURAL GAS FIRED UNITS

$$\left(\frac{13.7 \ lb \ PM}{10^6 \ ft^3}\right) \left(\frac{1 \ MMBtu}{8710 \ dscf}\right) \left(\frac{1 \ scf}{900 \ Btu}\right) \left(\frac{7000 \ gr}{1 \ lb}\right) = 0.01 \frac{grains}{dscf}$$

Where:

$$13.7 \ \frac{lb \cdot PM}{10^6 \cdot ft^3} = \text{uncontrolled emission factor for natural gas fired boilers (AP42, Table 1.4-1)} \\ \frac{900 \ Btu}{scf} = \text{the minimum expected higher heating value of natural gas (AP42, 1.4.1)} \\ 100 \ \frac{MMBtu}{hr} = \text{maximum heat input this template} \\ \frac{8710 \ dscf}{MMBtu} = \text{F factor, Fd, for natural gas (40CFR§60, App. A, Meth. 19, Table 19-1)} \\ \frac{7000 \ gr}{1 \ lb} = \text{conversion factor (AP42, Appendix A)}$$

The following condition on the draft permit will serve as a mechanism to ensure compliance with the requirements of this rule:

Permit Unit	Permit Condition
N-8044-4-2	1

### c. Starch receiving and storage operation (N-8044-6-1)

The maximum PM emission rate on the current PTO and the exhaust flow of the bin vent filter system were used to determine the PM concentration (gr/scf). See the calculation below.

PM Conc. (gr/scf) = 
$$(\underline{PM \text{ emission rate}}) \times (7,000 \text{ gr/lb})$$
  
(Exhaust Air flow rate) x (60 min/hr) x (24 hr/day)

 $PM_{10}$  emission rate = 0.1 lb/day. Assuming 100% of PM is  $PM_{10}$  Exhaust Gas Flow = 600 scfm

PM Conc. (gr/scf) = 
$$[(0.1 \text{ lb/day}) * (7,000 \text{ gr/lb})] \div [(600 \text{ ft}^3/\text{min}) * (60 \text{ min/hr}) * (24 \text{ hr/day})]$$

PM Conc. = 0.0008 gr/scf

As demonstrated with the calculation above, compliance with the Particulate Matter (PM) emission limit of 0.1 gr/dscf is expected.

The following condition on the draft permit will serve as a mechanism to ensure compliance with the requirements of this rule:

Permit Unit	Permit Condition
N-8044-6-2	3

# 12. District Rule 4305, <u>Boilers, Steam Generators, and Process</u> <u>Heaters - Phase 2</u>

Permit units subject to Rule 4305 are also subject to District Rules 4306 and 4320. Since the emissions limits of District Rule 4320 and all other requirements are equivalent or more stringent than District Rule 4305 requirements, compliance with District Rule 4320 requirements will satisfy requirements of District Rule 4305

### 13. District Rule 4306, <u>Boilers, Steam Generators, and Process</u> Heaters - Phase 3

This rule limits NOx, CO, SO<sub>2</sub> and PM<sub>10</sub> emissions from boilers, steam generators and process heaters rated greater than 5 MMBtu/hr.

This rule was most recently amended on December 17, 2020, but these rule amendments have not been incorporated into the SIP. The amended rule is as stringent as the SIP approved version of the rule that was adopted on October 16, 2008.

Permit units subject to Rule 4306 are also subject to District Rule 4320. Since emissions limits of District Rule 4320 and all other requirements are equivalent or more stringent than District Rule 4306 requirements, compliance with District Rule 4320 requirements will satisfy requirements of District Rule 4306.

# 14. District Rule 4320, <u>Advanced Emission Reduction Options for Boilers, Steam Generators, and Process Heaters Greater than 5.0 MMBTU/HR</u>

 a. 29.47 MMBtu/hr natural gas-fired boiler equipped with a low NOx burner and a Selective Catalytic Reduction (SCR) system (N-8044-4-2)

The purpose of District rule 4320 is to limit emissions of oxides of nitrogen (NOx) and carbon monoxide (CO) from boilers, steam generators, and process heaters.

This rule was most recently amended on December 17, 2020, but these rule amendments have not been incorporated into the SIP. The amended rule is as stringent as the SIP approved version of the rule that was adopted on October 16, 2008.

Section 4.2 states that the requirements of Sections 5.2 shall not apply to a unit when burning any fuel other than California PUC quality natural gas during California PUC quality natural gas curtailment provided all of the following conditions are met:

- 4.2.1 Fuels other than California PUC quality natural gas are burned no more than 168 cumulative hours in a calendar year plus 48 hours per calendar year for equipment testing, as limited by Permit to Operate.
- 4.2.2 NOx emission shall not exceed 150 ppmv or 0.215 lb/MMBtu. Demonstration of compliance with this limit shall be made by either source testing, continuous emission monitoring system (CEMS), an APCO approved Alternate Monitoring System, or an APCO approved portable NOx analyzer.

The unit's permit does not contain any provisions for natural gas curtailment; therefore, this section does not apply.

Section 5.2 of the rule specifies NOx and CO emission limits

Section 5.3.1 states that on and after January 1, 2010, an operator with units that will comply with the requirements of Section 5.1.2 in lieu of complying with Section 5.2 Table 1 shall pay a total annual fee to the District based on the total NOx emissions from those units.

Section 5.3.2 states that beginning January 1, 2025, an operator with units that will comply with the requirements of Section 5.1.2 in lieu of complying with Section 5.2 Table 2 shall pay a total annual emission fee to the District based on total NOx emissions from those units. Units paying an emissions fee under this section are not subject to Section 5.3.1.

Section 5.4.1 of this rule requires the operator to comply with one of the following requirements for the boiler:

- 5.4.1.1 Fire the boiler exclusively on PUC-quality natural gas, commercial propane, butane, or liquefied petroleum gas, or a combination of such gases;
- 5.4.1.2 Limit fuel sulfur content to no more than five (5) grains of total sulfur per one hundred (100) standard cubic feet;
- 5.4.1.3 Install and properly operate an emission control system that reduces SO<sub>2</sub> emissions by at least 95% by weight; or limit exhaust SO<sub>2</sub> to less than or equal to 9 ppmv corrected to 3.0% O<sub>2</sub>;

Section 5.5 requires low use units that are limited to less than or equal to 1.8 billion Btu per calendar year to comply with the following:

- 5.5.1 Tune the unit at least twice per calendar year, (from four to eight months apart).
- 5.5.2 Maintain exhaust oxygen concentrations at less than or equal to 3.00 percent by volume on a dry basis.

Section 5.6 states that on and after the Compliance Deadline in Section 5.0, the applicable emission limits of Sections 5.2 Table 1, Table 2, and 5.5.2 shall not apply during start-up or shutdown, provided an operator complies with the requirements specified in Sections 5.6.1 through 5.6.5. Sections 5.6.1 through 5.6.5 require the following:

1. The duration of each startup or each shutdown shall not exceed two hours, except as provided in Section 5.6.3.

2. The emission control system shall be in operation and emissions shall be minimized insofar as technologically feasible during startup and shutdown.

Section 5.7.1 requires that permit units subject to District Rule 4320, Section 5.2 emissions limits shall either install and maintain Continuous Emission Monitoring System (CEMS) for NOx, CO and oxygen, or implement an APCO-approved Alternate monitoring System.

Sections 5.7.2 and 5.7.3 require low use units subject to Section 5.5 to monitor operation characteristics recommended by the manufacturer as approved by the District, and maintain an operation non-resettable volumetric flow meter in each fuel line to each unit, so cumulative annual fuel usage can be verified. A group of similar units can share a centralized volumetric flow meter.

Section 5.7.4 allows units operated at seasonal sources and subject to 40 CFR 60 Subpart Db to install a parametric monitoring system in lieu of a CEMS.

Section 5.75 requires all approved alternative monitoring or parametric monitoring systems document continued operation within ranges of specified emissions-related performance indicators or operational characteristics in order to provide a reasonable assurance of compliance with applicable emission limits.

Section 5.7.6.1 requires operators complying with Sections 5.4.1.1 or 5.4.1.2 shall provide an annual fuel analysis to the District unless a more frequent sampling and reporting period is included in the Permit to Operate. Sulfur analysis shall be performed in accordance with the test methods in Section 6.2.

Section 5.7.6.2 requires operators complying with Section 5.4.1.3 by installing and operating a control device with 95% SOx reduction shall propose the key system operating parameters and frequency of the monitoring and recording. The monitoring option proposed shall be submitted for approval by the APCO.

Section 5.7.6.3 requires operators complying with Section 5.4.1.3 shall perform an annual source test unless a more frequent sampling and reporting period is included in the Permit to Operate. Source tests shall be performed in accordance with the test methods in Section 6.2.

Section 5.8.1 requires that the operator of any unit shall have the option of complying with either the applicable heat input (lb/MMBtu) emission limits or the concentration (ppmv) emission limits specified in Section 5.2. The emission limits selected to demonstrate compliance shall be specified in the source test proposal pursuant to Rule 1081 (Source Sampling)

Section 5.8.2 requires that all emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. Unless otherwise specified in the Permit to Operate, no determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0.

Section 5.8.3 requires Continuous Emissions Monitoring System (CEMS) emissions measurements to be averaged over a period of 15 consecutive minutes to demonstrate compliance with the applicable emission limits.

Section 5.8.4 requires that for emissions monitoring pursuant to Sections 5.7.1 and 6.3.1 using a portable NO<sub>X</sub> analyzer as part of an APCO approved Alternate Emissions Monitoring System, emission readings shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15-consecutive-minute sample reading or by taking at least five (5) readings evenly spaced out over the 15-consecutive-minute period.

Section 5.8.5 requires that for emissions source testing performed pursuant to Section 6.3.1 for the purpose of determining compliance with an applicable standard or numerical limitation of this rule, the arithmetic average of three (3) 30-consecutive-minute test runs shall apply. If two (2) of three (3) runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit.

Section 6.1 requires that the records required by Sections 6.1.1 through 6.1.5 shall be maintained for five calendar years and shall be made available to the APCO upon request. Failure to maintain records or information contained in the records that demonstrate noncompliance with the applicable requirements of this rule shall constitute a violation of this rule.

Section 6.1.2 requires that the operator of any unit subject to Section 5.5 shall record the amount of fuel use at least on a monthly basis for each unit.

Section 6.1.3 requires that the operator of any unit subject to Section 5.5.1 or 6.3.1 shall maintain records to verify that the required tune-up and the required monitoring of the operational characteristics of the unit have been performed.

Section 6.1.4 requires that the operator of a unit with startup or shutdown provisions keep records of the duration of the startup or shutdowns.

Section 6.1.5 requires that the operator of any unit fired on liquid fuel during PUC-quality natural gas curtailment periods pursuant to Section 5.4.2 shall record the sulfur content of the fuel, amount of fuel used, and duration of the natural gas curtailment period.

Section 6.2 identifies the following test methods as District-approved source testing methods for the pollutants listed:

Pollutant	Units	Test Method Required
NOx	ppmv	EPA Method 7E or ARB Method 100
NOx	lb/MMBtu	EPA Method 19
CO	ppmv	EPA Method 10 or ARB Method 100
Stack Gas O <sub>2</sub>	%	EPA Method 3 or 3A, or ARB Method 100
Stack Gas Velocities	ft/min	EPA Method 2
Stack Gas Moisture Content	%	EPA Method 4

Section 6.3.1 requires that this unit be tested to determine compliance with the applicable requirements of section 5.2 not less than once every 12 months. Upon demonstrating compliance on two consecutive compliance source tests, the following source test may be deferred for up to thirty-six months.

Sections 6.3.2.1 through 6.3.2.7 specify the requirements for units to qualify for group testing. There is only one boiler at this facility, therefore these sections are not applicable.

Section 6.4.1 requires that the operator of any unit shall submit to the APCO for approval an Emissions Control Plan according to the compliance schedule in Section 7.0 of District Rule 4320. The requirements of this section have already been satisfied.

Section 7.0 indicates that an operator must be in compliance with both the ATC deadline and compliance deadlines listed in Table 1 of Section 5.2 of Rule 4320. The boiler at this facility is already in compliance with upcoming compliance deadlines.

The following conditions on the draft permit will serve as a mechanism to ensure compliance with the requirements of this rule:

Permit Unit	Permit Conditions
N-8044-4-2	4 – 13, 19 – 22, 24 -26, 28 -34, 36, and 37

### 15. District Rule 4601, Architectural Coatings

a. Facility-wide (N-8044-0-0)

This rule limits the emissions of VOCs from architectural coatings. It requires limiting the application of any architectural coating to no more than 250 grams of VOC/liter of coating (less water and exempt compounds). Also, the Tables of Standards (section 5.2) limits the use of Specialty Coatings to a VOC content not to exceed the specified limits in Table 1 and Table 2 of Rule 4601. This rule further specifies labeling requirements, coatings thinning recommendations, storage requirements and cleanup requirements.

The following conditions on the draft permit will serve as a mechanism to ensure compliance with the requirements of this rule:

Permit Unit	Permit Conditions
N-8044-0-0	23, 24, and 25

# 16. District Rule 4607, <u>Graphic Arts and Paper, Film, Foil and Fabric Coatings</u>

a. Graphic arts printing operations consisting of flexographic printers (N-8044-3-1, -5-1, and -8-1 through -11-1)

The purpose of this rule is to limit VOC emissions from graphic arts printing operations, digital printing operations, and paper, film, foil or fabric coating operations.

This rule is applicable to any graphic arts printing operation, to digital printing operations, and to any paper, film, foil, or fabric coating

operation and to the organic solvent cleaning materials and processes associated with such operations.

Section 5.1 requires that any operator performing a graphic arts printing operation not subject to Section 5.2, 5.3, 5.4, or 5.5 of the rule shall not use graphic arts materials in excess of the VOC content limits in the tables shown below, in accordance with the corresponding effective date.

VOC Content Limits for Inks, Coatings, and Adhesives	
Material	Grams of VOC per liter (lb/gal), less water and less exempt compounds, as applied, effective on and after January 1, 2010
Flexographic Ink on Porous Substrates	225 (1.88)
All Other Inks	300 (2.5)
Coatings	300 (2.5)
Adhesives	150 (1.25)
Web Splicing Adhesives	150 (1.25)

VOC Content Limits for Fountain Solution	
Fountain Solution	Percent VOC by Volume, effective on and after January 1, 2010
Heatset Web Offset Lithographic	1.6
Coldset Web Offset Lithographic	5.0
Sheet-fed Offset Lithographic with maximum sheet size greater than 11 x 17 inches	5.0
All Other Presses	8.0

Section 5.2 specifies that an operator using a flexographic printing operation shall not use a specialty ink in excess of the VOC content limit in the table shown below, 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.

VOC Content Limits for Flexographic Specialty Ink	
Grams of VOC per liter (lb/gal), less and less exempt compounds, as ap effective on and after January 1, 2	
Metallic Ink	460 (3.8)
Matte Finish Ink	535 (4.5)
Metallic Ink and Matte Finish Ink on Flexible Package Printing	383 (3.2)

Section 5.3 specifies that an operator performing coldset web offset lithographic printing shall use fountain solution with that is 5% alcohol substitute or less, by weight, and shall have no alcohol in the fountain solution.

Section 5.4 specifies that an operator using a screen printing operation shall not use graphic arts materials in excess of the VOC content limits

Section 5.5 specifies the maximum VOC content of graphic arts materials used in paper, film, foil, and fabric coating operations

Section 5.6 states that an operation in lieu of compliance with VOC emission requirements of Rule 4607, a District approved VOC control must be used system used. The operations at this facility are in compliance with rule therefore no additional controls are needed.

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

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

Section 5.8, requires that an operator shall not use organic solvents for cleaning operations that exceed the VOC content limits specified in the following table.

VOC Content Limits for Solvent Cleaning	
Type of Solvent Cleaning Operation	VOC content, less water & exempts compounds (lb/gal)
Surface Preparation for coating, ink, or adhesive application	0.21
Cleaning of coating or adhesive application equipment	0.21
Cleaning of ink application equipment	0.83
<ul> <li>Flexographic printing</li> </ul>	0.21
<ul> <li>Specialty Flexographic Printing</li> </ul>	0.83

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

Section 5.10 requires that an operator shall properly use and properly operates all graphic arts printing technologies as directed and/or specified by the manufacturer of the printer or graphic arts materials.

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

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

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

Section 6.1.4 specifies recordkeeping requirements for the flexographic specialty inks. If flexographic specialty inks are used pursuant to Section 5.2, the permittee shall record, on a daily basis, the type and amount of each specialty ink used.

The following conditions on the draft permit will serve as a mechanism to ensure compliance with the requirements of this rule:

Permit Unit	Permit Conditions
N-8044-3-1	3, 5, 6, 9 – 15, and 19
N-8044-5-1	2, 4, 7 – 14, and 17
N-8044-8-1	2, 5, 8 – 15, and 18
N-8044-9-1	2, 5, 8 – 15, and 20
N-8044-10-1	2, 5, 8 – 15, and 20
N-8044-11-1	2, 5, 8 – 15, and 20

#### 17. District Rule 4653, Adhesives and Sealants

a. Graphic arts printing operations consisting of flexographic printers (N-8044-3-1, -5-1, and -8-1 through -11-1)

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.

Section 4.1.2 states the use of adhesive products or sealant products containing less than 20 grams VOC per liter is exempt from the requirements of this rule. The adhesives used by the facility contain no VOCs.

The following conditions on the draft permit will serve as a mechanism to ensure compliance with the requirements of this rule:

Permit Unit	Permit Condition
N-8044-3-1	5
N-8044-5-1	4
N-8044-8-1	5
N-8044-9-1	5
N-8044-10-1	5
N-8044-11-1	5

#### 18. District Rule 4702, Internal Combustion Engines

a. 305 bhp diesel fired Tier 3 emergency IC engine powering a fire pump (N-8044-2-1)

The purpose of this rule is to limit the emissions of nitrogen oxides (NOx), carbon monoxide (CO), and volatile organic compounds (VOC) from internal combustion engines. This rule applies to any internal combustion engine with a rated brake horsepower greater than 50 horsepower.

This rule was most recently amended on August 19, 2021, but these rule amendments have not been incorporated into the SIP. The amended rule is as stringent as the SIP approved version of the rule that was adopted on November 14, 2013.

Section 4.2 state exempts emergency standby IC engines with nonresettable elapsed time meters from all Rule 4702 requirements except for Section 5.9 and Section 6.2.3. In lieu of a nonresettable time meter, the owner of an emergency engine may use an alternative device, method, or technique, in determining operating time provided that the alternative is approved by the APCO. The owner of the engine shall properly maintain and operate the time meter or alternative device in accordance with the manufacturer's instructions.

Section 4.3 provides that except for the administrative requirements of section 6.2.3, the requirements of this rule shall not apply to an engine that is:

- (a) operated exclusively to preserve or protect property, human life, or public health during a disaster or state of emergency, such as a fire or flood:
- (b) except for operations associated with (a), limited to operate no more than 100 hours per calendar year as determined by an operational nonresettable elapsed operating time meter, for periodic maintenance, periodic readiness testing, and readiness testing during and after repair work of the engine, and
- (c) operated with a nonresettable elapsed operating time meter. In lieu of installing a nonresettable time meter, the owner of an engine may use an alternative device, method, or technique, in determining operating time provided that the alternative is approved

by the APCO. The owner of the engine shall properly maintain and operate the time meter or alternative device in accordance with the manufacturer's instructions.

#### Section 5.9 requires the owner to:

- 5.9.2 Properly operate and maintain each engine as recommended by the engine manufacturer or emission control system supplier.
- 5.9.3 Monitor the operational characteristics of each engine as recommended by the engine manufacturer or emission control system supplier.
- 5.9.4 Install and operate a nonresettable elapsed operating time meter. In lieu of installing a nonresettable time meter, the owner of an engine may use an alternative device, method, or technique, in determining operating time provided that the alternative is approved by the APCO and is allowed by Permit-to-Operate or Permit-Exempt Equipment Registration condition. The owner of the engine shall properly maintain and operate the time meter or alternative device in accordance with the manufacturer's instructions.

Section 6.2.3 requires that an owner claiming an exemption under section 4.3 shall maintain annual operating records. This information shall be retained for at least five years, shall be readily available, and provided to the APCO upon request. The records shall include, but are not limited to, the following: total hours of operation, the type of fuel used, the purpose for operating the engine, for emergency standby engines, all hours of nonemergency and emergency operation shall be reported, and other support documentation necessary to demonstrate claim to the exemption.

The following conditions on the draft permit will serve as a mechanism to ensure compliance with the requirements of this rule:

Permit Unit	Permit Condition
N-8044-2-1	5, 7, and 12

### 19. District Rule 4801, Sulfur Compounds

- a. 305 bhp diesel fired Tier 3 emergency IC engine powering a fire pump (N-8044-2-1)
- b. 29.47 MMBtu/hr natural gas-fired boiler equipped with a low NOx burner and a Selective Catalytic Reduction (SCR) system (N-8044-4-2)

Rule 4801 requires that sulfur compound emissions (as SO<sub>2</sub>) shall not exceed 0.2% by volume.

The following conditions on the draft permit will serve as a mechanism to ensure compliance with the requirements of this rule:

Permit Unit	Permit Condition	
N-8044-2-1	4	
N-8044-4-2	4	

# 20. District Rules 8021, 8031, 8041, 8051, 8061, and District Rule 8071, Fugitive Dust (PM<sub>10</sub>) Emissions

a. Facility-wide (N-8044-0-0)

These regulations contain requirements for the control of fugitive dust. These requirements apply to various sources, including construction, demolition, excavation, extraction, mining activities, outdoor storage piles, paved and unpaved roads.

The following conditions on the draft permit will serve as a mechanism to ensure compliance with the requirements of this rule:

Permit Unit	Permit Condition	
N-8044-0-0	29-34	

# 21. 40 CFR Subpart Dc, <u>Standards of Performance for Small</u> Industrial-Commercial-Institutional Steam Generating Units

 a. 29.47 MMBtu/hr natural gas-fired boiler equipped with a low NOx burner and a Selective Catalytic Reduction (SCR) system (N-8044-4-2)

This subpart applies to Small Industrial-Commercial-Industrial Steam Generators between 10 MMBtu/hr and 100 MMBtu/hr (post-6/9/89 construction, modification or, reconstruction). Subpart Dc has standards for SO<sub>x</sub> and PM<sub>10</sub>.

# 60.42c - Standards for Sulfur Dioxide (SO2)

Since coal is not combusted by the boiler in this project, the requirements of this section are not applicable.

#### <u>60.43c – Standards for Particulate Matter (PM)</u>

The boiler is not fired on coal, combust mixtures of coal with other fuels, combust wood, combust mixtures of wood with other fuels, or oil; therefore, the boiler will not be subject to the requirements of this section.

# <u>60.44c – Compliance and Performance Tests Methods and Procedures for Sulfur Dioxide.</u>

Since the boiler at this facility is not subject to the sulfur dioxide requirements of this subpart, no testing to show compliance is required. Therefore, the requirements of this section are not applicable to the boiler in this project.

# <u>60.45c – Compliance and Performance Test Methods and Procedures</u> for Particulate Matter

Since the boiler at this facility is not subject to the particulate matter requirements of this subpart, no testing to show compliance is required. Therefore, the requirements of this section are not applicable to the boiler in this project.

#### <u>60.46c – Emission Monitoring for Sulfur Dioxide</u>

Since the boiler at this facility is not subject to the sulfur dioxide requirements of this subpart, no monitoring is required. Therefore, the requirements of this section are not applicable to the boiler in this project.

#### 60.47c – Emission Monitoring for Particulate Matter

Since the boiler in this project is not subject to the particulate matter requirements of this subpart, no monitoring is required. Therefore, the requirements of this section are not applicable to the boiler in this project.

# <u>60.48c – Reporting and Recordingkeeping Requirements</u>

Section 60.48c(a) states that the owner or operator of each affected facility shall submit notification of the date of construction or reconstruction and actual startup, as provided by §60.7 of this part. This notification shall include:

(1) The design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility.

The design heat input capacity and type of fuel combusted at the facility will be listed on the unit's equipment description. No conditions are required to show compliance with this requirement.

(2) If applicable, a copy of any federally enforceable requirement that limits the annual capacity factor for any fuel mixture of fuels under §60.42c or §40.43c.

This requirement is not applicable since the unit is not subject to §60.42c or §40.43c.

(3) The annual capacity factor at which the owner or operator anticipates operating the affected facility based on all fuels fired and based on each individual fuel fired.

The facility has not proposed an annual capacity factor; therefore, one will not be required.

(4) Notification if an emerging technology will be used for controlling SO<sub>2</sub> emissions. The Administrator will examine the description of

the control device and will determine whether the technology qualifies as an emerging technology. In making this determination, the Administrator may require the owner or operator of the affected facility to submit additional information concerning the control device. The affected facility is subject to the provisions of §60.42c(a) or (b)(1), unless and until this determination is made by the Administrator

This requirement is not applicable since the unit is not equipped with an emerging technology used to control SO<sub>2</sub> emissions.

Section 60.48c(g) states that the owner or operator of each affected facility shall record and maintain records of the amounts of each fuel combusted during each operating day.

Section 60.48c(i) states that all records required under this section shall be maintained by the owner or operator of the affected facility for a period of two years following the date of such record. District Rule 4320 requires that records be kept for five years.

The following conditions on the draft permit will serve as a mechanism to ensure compliance with the requirements of this rule:

Permit Unit	Permit Condition	
N-8044-4-2	4 and 34	

# 22. 40 CFR 60, Subpart IIII, <u>Standards of Performance for Stationary</u> <u>Compression Ignition Internal Combustion Engines</u>

a. 305 bhp diesel fired Tier 3 emergency IC engine powering a fire pump (N-8044-2-1)

This subpart is applicable to owners and operators of stationary compression ignited internal combustion engines that commence construction after July 11, 2005, or July 1 2006 for fire pump engines.

Section 60.4205(b) states that owners and operators of fire pump engines must comply with the following emission standards in table 4 of the subpart. The fire pump engine at this facility must meet the following emission requirements:

Max Engine power	NMHC + NO <sub>x</sub>	CO	PM
225≤KW<450	4.0 (3.0)	3.5 (2.6)	0.20 (0.15)
(300≤HP<600)			

Section 60.4206 states that owners or operators of CI engines must meet the applicable emission standards for the entire life of said engines. The Tier 3 level emissions for the proposed engine will be listed on the permit as emission factors, ensuring that the emission standards are met over the entire life of the engine. Conditions 6 and 7 of proposed permit N-8044-2-1 ensure compliance with this section.

Section 60.4207(b) states that beginning October 1, 2010, owners and operators of stationary CI ICE subject to this subpart with a displacement of less than 30 liters per cylinder that use diesel fuel must use diesel fuel that meets the requirements of 40 CFR 80.510(b) for nonroad diesel fuel. Section 80.510(b) states that beginning June 1, 2010, except as otherwise specifically provided in this subpart, the sulfur content for all non-road diesel fuel shall not exceed 15 ppm. Condition 4 of proposed permit N-8044-2-1 ensures compliance with this section.

Section 60.4208 lists deadline dates for importing or installing stationary CI engines produced in the previous model year. None of the deadline dates affect the engine proposed in this project. Therefore, this section does not apply.

Section 60.4209 applies to emergency stationary CI engines that do not meet the applicable standards and stationary CI engines equipped with a diesel particulate filter. The proposed engine in this project does not fall under either of these two categories. Therefore, this section does not apply.

Section 60.4210 applies only to engine manufacturers. Therefore, this section will not be discussed unless it is referenced later by another section of this subpart.

Section 60.4211(a) states that owners or operators who comply with the emission standards specified in this subpart must operate and maintain the stationary CI engine and control device according to the manufacturer's written instructions or procedures developed by the owner or operator that are approved by the engine manufacturer. Condition 9 of proposed permit N-8044-2-1 ensures compliance with this section.

Section 60.4211(b) applies to pre-2007 model year engines. Therefore, this section does not apply.

Section 60.4211(c) states that if you are an owner or operator of a 2007 model year and later stationary CI internal combustion engine and must comply with the emission standards specified in Section 60.4204(b) or Section 60.4205(b), or if you are an owner or operator of a CI fire pump engine that is manufactured during or after the model year that applies to your fire pump engine power rating in table 3 to this subpart and must comply with the emission standards specified in Section 60.4205(c), you must comply by purchasing an engine certified to the emission standards in Section 60.4204(b), or Section 60.4205(b) or (c), as applicable, for the same model year and maximum (or in the case of fire pumps, NFPA nameplate) engine power. The engine must be installed and configured according to the manufacturer's specifications.

Section 60.4211(d) applies to owners or operators who must comply with the emission standards specified in Section 60.4204(c) or Section 60.4205(d). The fire pump engine at this facility is not subject to the emission standards specified in Sections 60.4204(c) or 60.4205(d). Therefore, this section does not apply.

Section 60.4211(e) applies to owners or operators of modified or reconstructed stationary CI internal combustion engines. As discussed, the proposed engine is new; therefore, this section does not apply.

Section 60.4211(f) applies to owners or operators of an emergency stationary ICE. This section states you must operate the emergency stationary ICE according to the requirements in paragraphs (f)(1) through (3). In order for the engine to be considered an emergency stationary ICE under this subpart, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 100 hours per year, as described in paragraphs (f)(1) through (3) of this section, is prohibited. If you do not operate the engine according to the requirements in paragraphs (f)(1) through (3) of this section, the engine will not be considered an emergency engine under this subpart and must meet all requirements for non-emergency engines. Section 60.4212 applies to owners or operators of a stationary CI engine with a displacement of less than 30 liters per cylinder and required to conduct performance tests pursuant to Section 60.4211(b). Section 60.4211(b) does not apply to this engine; therefore, performance tests are not required and this section does not apply.

Section 60.4213 applies to owners or operators of CI engines with a displacement of greater than or equal to 30 liters per cylinder. The

displacement is less than 30 liters per cylinder for this engine in this project, therefore, this section does not apply.

Section 60.4214(a) states owners and operators of non-emergency stationary CI engines that are greater than 3,000 hp, or have a displacement of greater than or equal to 10 liters per cylinder, or are pre-2007 model year engines that are greater than 175 hp and not certified, must meet the requirements of paragraphs (a)(1) and (2) of this section. The proposed engine is a post-2007 model year emergency engine rated less than 3,000 hp and has a displacement less than 10 liters per cylinder. Therefore, this section does not apply.

Section 60.4214(b) states that if the stationary CI internal combustion engine is an emergency stationary internal combustion engine, the owner or operator is not required to submit an initial notification. Starting with the model years in table 5 to this subpart, if the emergency engine does not meet the standards applicable to non-emergency engines in the applicable model year, the owner or operator must keep records of the operation of the engine in emergency and non-emergency service that are recorded through the non-resettable hour meter. The owner must record the time of operation of the engine and the reason the engine was in operation during that time. Since the engine in this project meets the applicable standards, this section does not apply.

Section 60.4214(c) applies to stationary CI engines equipped with a diesel particulate filter. Therefore, this section does not apply.

Sections 60.4215 and 60.4216 apply to engines operated outside the continental United States. Therefore, these sections do not apply.

Section 60.4217 applies to engines that use special fuels and cannot meet the emission limits that the engine was originally certified to. Since the proposed engine is diesel-fired and meets the emission limits that the engine was originally certified to, this section does not apply.

#### 23. 40 CFR 61, Subpart M National Emission Standard for Asbestos

#### a. Facility-wide (N-8044-0-0)

There are applicable requirements from the National Emissions Standards for Hazardous Air Pollutants that apply to all sources in general. These requirements pertain to asbestos removal and disposal from renovated or demolished structures.

The following condition on the draft permit will serve as a mechanism to ensure compliance with the requirements of this rule:

Permit Unit	Permit Condition
N-8044-0-0	35

## 24. 40 CFR Part 63, <u>Subpart KK National Emission Standards for the</u> Printing and Publishing Industry

a. Graphic arts printing operations consisting of flexographic printers (N-8044-3-1, -5-1, and -8-1 through -11-1)

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

40 CFR 63.2 defines "major source" as any stationary source or group of stationary sources located within a contiguous area and under common control that emits or has the potential to emit considering controls, in the aggregate, 10 tons per year or more of any hazardous air pollutant or 25 tons per year or more of any combination of hazardous air pollutants, unless the Administrator establishes a lesser quantity, or in the case of radionuclides, different criteria from those specified in this sentence.

Per the HAP Emission summary included in Attachment D, the facility is not a "major source of HAP emissions." Therefore, the graphic arts operations at this facility are not subject to this subpart.

# 25. 40 CFR 63, Subpart ZZZZ, <u>National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines</u>

a. Graphic arts printing operations consisting of flexographic printers (N-8044-3-1, -5-1, and -8-1 through -11-1)

This subpart applies to Stationary RICE engines located a major area source of HAP emissions.

The requirements of this subpart are met when stationary engines meet the requirements of either 40 CFR Subpart IIII or 40 CFR Subpart JJJJ. The engine at this facility meets the requirements of 40 CFR Subpart IIII, Therefore no further discussion is required

# 26.40 CFR 63, Subpart DDDDD, <u>National Emission Standards for Hazardous Air Pollutants for Industrial for Institutional</u>, Commercial, and Industrial Boilers and Process Heaters

 a. 29.47 MMBtu/hr natural gas-fired boiler equipped with a low NOx burner and a Selective Catalytic Reduction (SCR) system (N-8044-4-2)

This subpart establishes national emission limitations and work practice standards for hazardous air pollutants (HAP) emitted from industrial, commercial, and institutional boilers and process heaters located at major sources of HAP.

40 CFR 63.2 defines "major source" as any stationary source or group of stationary sources located within a contiguous area and under common control that emits or has the potential to emit considering controls, in the aggregate, 10 tons per year or more of any hazardous air pollutant or 25 tons per year or more of any combination of hazardous air pollutants, unless the Administrator establishes a lesser quantity, or in the case of radionuclides, different criteria from those specified in this sentence.

Per the HAP Emission summary included in Attachment D, the facility is not a "major source of HAP emissions." Therefore, the boiler at this facility are not subject to this subpart.

# 27.40 CFR 63 Subpart JJJJJJ, <u>National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources</u>

 a. 29.47 MMBtu/hr natural gas-fired boiler equipped with a low NOx burner and a Selective Catalytic Reduction (SCR) system (N-8044-4-2)

The requirements of this subpart apply to industrial, commercial, or institutional boilers at any area source of hazardous air pollutants (HAP). Section 63.11195 states gas-fired boilers are not subject to this

subpart. The boiler at this facility is solely gas-fired and is therefore not subject to this subpart. No further discussion is required

#### 28. 40 CFR 82, Subpart F, Stratospheric Ozone

#### a. Facility-wide (N-8044-0-0)

There are applicable requirements from Title VI of the CAA (Stratospheric Ozone) that apply to all sources in general. These requirements pertain to air conditioners, chillers and refrigerators located at a Title V source and to disposal of air conditioners or maintenance/recharging/disposal of motor vehicle air conditioners (MVAC).

The following conditions on the draft permit will serve as a mechanism to ensure compliance with the requirements of this rule:

Permit Unit	Permit Condition			
N-8044-0-0	27 and 28			

#### 29. 40 CFR Part 64, Compliance Assurance Monitoring (CAM)

#### §64.2 – Applicability

This section requires Compliance Assurance Monitoring (CAM) for units that meet the following three criteria:

- 1. the unit must have an emission limit for the pollutant;
- the unit must have add-on controls for the pollutant; these are devices such as flue gas recirculation (FGR), baghouses, and catalytic oxidizers; and
- 3. the unit must have a pre-control potential to emit of greater than the major source thresholds.

Pollutant	Major Source Threshold (lb/year)
VOC	20,000
NOx	20,000
CO	200,000
PM <sub>10</sub>	140,000
SO <sub>X</sub>	140,000

a. 305 bhp diesel fired Tier 3 emergency IC engine powering a fire pump (N-8044-2-1)

This engine is not equipped with any add-on control equipment. Therefore, this unit is not subject to CAM requirements.

 b. 29.47 MMBtu/hr natural gas-fired boiler equipped with a low NOx burner and a Selective Catalytic Reduction (SCR) system (N-8044-4-2)

This unit contains emission limits for NOx, SOx, PM10, CO, and VOC. This unit has no add-on controls for SOx, PM10 or VOC emissions. Therefore, this unit is not subject to CAM for SOx, PM10 or VOC emissions.

This unit is equipped with a Selective Catalytic Reduction (SCR) system that decreases NOx and CO emissions using a catalyst.

Uncontrolled NOx and CO emissions can be calculated using the small boiler low NOx boiler emission factor in AP-42 and an assumed natural gas heating value of 1050 (MMBtu/MMscf).

Pollutant	Controlled Emission Factor lb/MMBtu (ppmvd)	Uncontrolled Emission Factor lb/MMBtu (lb/MMscf)		
NOx	0.0030 (2.5)	0.048 (50)		
CO	0.037 (50)	0.08 (84)		

#### Uncontrolled Potential to Emit

UPE = EF (lb/MMscf) x Natural Gas Heating Value (MMscf/MMBtu) x Heat Input (MMBtu/hr) x 8,760 hr/year

 $UPE_{NOx} = 50 \text{ (lb/MMscf) } x \text{ 1/1050 (MMscf/MMBtu) } x \text{ 29.47}$  (MMBtu/hr) x 8,760 hr/year

 $UPE_{NOx} = 12,293 lb-NOx/year$ 

Since 12,293 lb-NOx/year < 20,000 lb-NOx/year (Major Source threshold for NOx), this unit is not subject to CAM for NOx emissions.

UPEco = 84 (lb/MMscf) x 1/1050 (MMscf/MMBtu) x 29.47 (MMBtu/hr) x 8,760 hr/year

 $UPE_{CO} = 20,653 \text{ lb-CO/year}$ 

Since 20,653 lb-CO/year < 200,000 lb-CO/year (Major Source threshold for CO), this unit is not subject to CAM for CO emissions.

c. Graphic arts printing operations consisting of flexographic printers (N-8044-3-1, -5-1, and -8-1 through -11-1)

These flexographic printing operations are not equipped with any add-on control equipment. Therefore, these units are not subject to CAM requirements.

d. Starch receiving and storage operation (N-8044-6-1)

This strach reciving and storage operation only has an emission limit for PM10 emissiosn. PM emissions are controlled by bin vent filter. The control efficency of the filter is listed at 99% for PM10. The uncontrolled emissions from this operation can be calculted using the current permit PM10 emission limit and the filter control efficency.

Uncontrolled EF = Controlled EF/(1-control efficiency)

Pollutant	Controlled Emission Factor lb-PM10/ton-starch	Uncontrolled Emission Factor lb-PM10/ton-starch
PM10	0.00238	0.238

#### Uncontrolled Potential to Emit

UPE<sub>PM10</sub> = Uncontrolled EF (lb/ton) x [Throuput/year (ton/year)]

 $UPE_{PM10} = 0.238 \text{ (lb/ton) } x [50 \text{ (ton/day) } x 365 \text{ (day/year)}]$ 

 $UPE_{PM10} = 4,344 \text{ lb-PM10/year}$ 

Since 4,344 lb-PM10/year < 140,000 lb-PM10/year (Major Source threshold for PM10), this unit is not subject to CAM for PM10 emissions.

e. Corrugated cardboard manufacturing operation (N-8044-7-1)

The corrugated cardboard manufacturing operation has emission limits for VOC emissions only. This operation is not equipped with any add-on control equipment. Therefore, this operation is not subject to CAM requirements.

#### X. PERMIT SHIELD

A permit shield legally protects a facility from enforcement of the shielded regulations when a source is in compliance with the terms and conditions of the Title V permit. Compliance with the terms and conditions of the Operating Permit is considered compliance with all applicable requirements upon which those conditions are based, including those that have been subsumed.

A. Requirements Addressed by Model General Permit Templates

The applicant has not requested to utilize any model general permit templates.

#### XI. PERMIT CONDITIONS

See draft operating permit, beginning on the following page.

**EXPIRATION DA FACILITY:** N-8044-0-0

## **FACILITY-WIDE REQUIREMENTS**

- 1. The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1 and Stanislaus County Rule 110] Federally Enforceable Through Title V Permit
- The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0 and Stanislaus County Rule 110] Federally Enforceable Through Title V Permit
- {4364} The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0] Federally Enforceable Through Title V Permit
- Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (12/18/2014). [District Rule 2010, 3.0 and 4.0; and 2020] Federally Enforceable Through Title V Permit
- {4366} The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 7.0; 2080; and 2520, 9.8.1 and 9.13.1] Federally Enforceable Through Title V Permit
- {4367} A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District. [District Rule 2031] Federally Enforceable Through Title V Permit
- {4368} Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District. [District Rule 2040] Federally Enforceable Through Title V Permit
- {4369} The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit
- {4370} The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.4:2] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate. Any amendments to these Facility-wide Requirements that affect specific Permit Units may constitute modification of those Permit Units

Facility Name: PACIFIC SOUTHWEST CONTAINER, LLC Location: 671 MARIPOSA RD, MODESTO, CA N-8044-0-0: Sep 2 2021 11:33AM -- MUTHANAM

- 10. {4371} The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.5.1] Federally Enforceable Through Title V Permit
- 11. {4372} Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520 (6/21/01). [District Rules 2520, 9.5.2 and 1100, 7.0] Federally Enforceable Through Title V Permit
- 12. {4373} If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.7] Federally Enforceable Through Title V Permit
- 13. {4374} It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520, 9.8.2] Federally Enforceable Through Title V Permit
- 14. {4375} The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.8.3] Federally Enforceable Through Title V Permit
- 15. {4376} The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.8.4] Federally Enforceable Through Title V Permit
- 16. {4377} The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520, 9.8.5] Federally Enforceable Through Title V Permit
- 17. {4378} The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.9] Federally Enforceable Through Title V Permit
- 18. {4379} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520, 9.13.2.1] Federally Enforceable Through Title V Permit
- 19. {4380} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.13.2.2] Federally Enforceable Through Title V Permit
- 20. {4381} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520, 9.13.2.3] Federally Enforceable Through Title V Permit
- 21. {4382} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520, 9.13.2.4] Federally Enforceable Through Title V Permit
- 22. 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 Stanislaus County Rule 401] Federally Enforceable Through Title V Permit FACILITY WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

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

Facility Name: PACIFIC SOUTHWEST CONTAINER, LLC Location: 671 MARIPOSA RD, MODESTO, CA N-8044-0-0: Sep 2 2021 11:33AM -- MUTHANAM

- 23. {4384} No person shall manufacture, blend, repackage, supply, sell, solicit or apply any architectural coating with a VOC content in excess of the corresponding limit specified in Table of Standards 1 effective until 12/30/10 or Table of Standards 2 effective on and after 1/1/11 of District Rule 4601 (12/17/09) for use or sale within the District. [District Rule 4601, 5.1] Federally Enforceable Through Title V Permit
- 24. {4385} All VOC-containing materials subject to Rule 4601 (12/17/09) shall be stored in closed containers when not in use. [District Rule 4601, 5.4] Federally Enforceable Through Title V Permit
- 25. {4386} The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.3 (12/17/09). [District Rule 4601, 6.1 and 6.3] Federally Enforceable Through Title V Permit
- 26. {4387} With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.13.1 and 10.0] Federally Enforceable Through Title V Permit
- 27. {4388} If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR Part 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit
- 28. {4389} If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR Part 82, Subpart B. [40 CFR Part 82, Subpart B] Federally Enforceable Through Title V Permit
- 29. {4390} Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8021] Federally Enforceable Through Title V Permit
- 30. {4391} Outdoor handling, storage and transport of any bulk material which emits dust shall comply with the requirements of District Rule 8031, unless specifically exempted under Section 4.0 of Rule 8031 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8031] Federally Enforceable Through Title V Permit
- 31. {4392} An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8041] Federally Enforceable Through Title V Permit
- 32. {4393} Whenever open areas are disturbed, or vehicles are used in open areas, the facility shall comply with the requirements of Section 5.0 of District Rule 8051, unless specifically exempted under Section 4.0 of Rule 8051 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8051] Federally Enforceable Through Title V Permit
- 33. {4394} Any paved road or unpaved road shall comply with the requirements of District Rule 8061 unless specifically exempted under Section 4.0 of Rule 8061 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8061] Federally Enforceable Through Title V Permit
- 34. {4395} Any unpaved vehicle/equipment area that anticipates more than 50 Average annual daily Trips (AADT) shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 150 vehicle trips per day (VDT) shall comply with the requirements of Section 5.1.2 of District Rule 8071. On each day that 25 or more VDT with 3 or more axles will occur on an unpaved vehicle/equipment traffic area, the owner/operator shall comply with the requirements of Section 5.1.3 of District Rule 8071. On each day when a special event will result in 1,000 or more vehicles that will travel/park on an unpaved area, the owner/operator shall comply with the requirements of Section 5.1.4 of District Rule 8071. All sources shall comply with the requirements of Section 5.0 of District Rule 8071 unless specifically exempted under Section 4.0 of Rule 8071 (9/16/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8071] Federally Enforceable Through Title V Permit
- 35. {4396} Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation) [40 CFR 61 Subpart M] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE These terms and conditions are part of the Facility-wide Permit to Operate.

Facility Name: PACIFIC SOUTHWEST CONTAINER, LLC 671 MARIPOSA RD, MODESTO, CA Location:

N-8044-0-0 : Sep 2 2021 11:33AM -- MUTHANAN

- 36. {4397} The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit
- 37. {4398} The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V Permit
- 38. {4399} When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit
- 39. On {Insert issuance date}, the initial Title V permit was issued. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report are based upon this initial permit issuance date, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days after the end of the reporting period. [District Rule 2520] Federally Enforceable Through Title V Permit

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

Facility Name: PACIFIC SOUTHWEST CONTAINER, LLC Location: 671 MARIPOSA RD, MODESTO, CA
N-8044-0-0 - Sep 2 2021 11:33AM -- MITHANAM

N-8044-0-0 : Sep 2 2021 11:33AM -- MUTHAN

**PERMIT UNIT:** N-8044-2-1

EXPIRATION DATE: 08/31/2024

#### **EQUIPMENT DESCRIPTION:**

305 BHP CUMMINS MODEL CFP9E-F30 DIESEL FIRED EMERGENCY ENGINE (TIER 3 CERT) FIED) POWERING A FIRE PUMP.

## PERMIT UNIT REQUIREMENTS

- 1. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
- 2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
- 3. {1898} The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
- 4. Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801, and 17 CCR 93115 and 40 CFR 60 Subpart IIII] Federally Enforceable Through Title V Permit
- 5. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit
- Emissions from this IC engine shall not exceed any of the following limits: 2.20 g-NOx/bhp-hr, 1.417 g-CO/bhp-hr, or 0.123 g-VOC/bhp-hr. [District Rule 2201 and 13 CCR 2423, 17 CCR 93115, and 40 CFR 60 Subpart IIII] Federally Enforceable Through Title V Permit
- 7. Emissions from this IC engine shall not exceed 0.118 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102 and 13 CCR 2423, 17 CCR 93115, and 40 CFR 60 Subpart IIII] Federally Enforceable Through Title V Permit
- 8. This engine shall be operated only for testing and maintenance of the engine, required regulatory purposes, and during emergency situations. For testing purposes, the engine shall only be operated the number of hours necessary to comply with the testing requirements of the National Fire Protection Association (NFPA) 25 "Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems". Total hours of operation for all maintenance, testing, and required regulatory purposes shall not exceed 100 hours per calendar year. [District Rule 4702 and 17 CCR 93115 and 40 CFR 60 Subpart IIII] Federally Enforceable Through Title V Permit
- 9. This engine shall be operated and maintained in proper operating condition as recommended by the engine manufacturer or emissions control system supplier. [District Rule 4702 and 40 CFR 60 Subpart IIII] Federally Enforceable Through Title V Permit
- 10. An emergency situation is an unscheduled electrical power outage caused by sudden and reasonably unforeseen natural disasters or sudden and reasonably unforeseen events beyond the control of the permittee. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit
- 11. The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and maintenance operations, and the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.). For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

Facility Name: PACIFIC SOUTHWEST CONTAINER, LLC Location: 671 MARIPOSA RD, MODESTO, CA

N-8044-2-1 : Sep 2 2021 11:33AM -- MUTHANAM

12. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit

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

Facility Name: PACIFIC SOUTHWEST CONTAINER, LLC Location: 671 MARIPOSA RD, MODESTO, CA
N-8044-2-1: Sep 2 2021 11:33AM -- MUTHANAM

**PERMIT UNIT:** N-8044-3-1

EXPIRATION DATE: 08/31/2024

#### **EQUIPMENT DESCRIPTION:**

GRAPHIC ARTS PRINTING OPERATION CONSISTING OF A 5-COLOR BOBST MODEL DRO 1632 RS NON-HEATSET FLEXOGRAPHIC PRINTER WITH FOLDER, GLUER, AND A ROTARY DIE-CUTTER

## PERMIT UNIT REQUIREMENTS

- 1. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
- 2. 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
- 3. VOC emissions from this permit unit shall not exceed any of the following limits: 16.7 lb/day and 5,817 lb/year (12-month rolling total). [District Rule 2201] Federally Enforceable Through Title V Permit
- 4. 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
- 5. 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] Federally Enforceable Through Title V Permit
- 6. 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] Federally Enforceable Through Title V Permit
- 7. Low-End Graphics print jobs are print jobs that does not qualify the definition of High-End Graphic print jobs. [District Rule 2201] Federally Enforceable Through Title V Permit
- 8. 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
- 9. 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, handheld spray bottles; non-atomized solvent flow method, or solvent flushing method. [District Rule 4607] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

Facility Name: PACIFIC SOUTHWEST CONTAINER, LLC

Location: 671 MARIPOSA RD, MODESTO, CA N-8044-3-1: Sep 2 2021 11:34AM -- MUTHANAM

- 10. 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
- 11. 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
- 12. 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
- 13. 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
- 14. 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
- 15. 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
- 16. 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
- 17. 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
- 18. 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

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

Facility Name: PACIFIC SOUTHWEST CONTAINER, LLC Location: 671 MARIPOSA RD, MODESTO, CA
N-8044-3-1: Sep 2 2021 11:34AM -- MUTHANAM

**PERMIT UNIT:** N-8044-4-2

EXPIRATION DATE: 08/31/2024

#### **EQUIPMENT DESCRIPTION:**

29.47 MMBTU/HR CLEAVER BROOKS MODEL CBEX-E 700-722-250ST NATURAL GAS-FIRED BONLER EQUIPPED WITH A CBEX ELITE LOW NOX BURNER SYSTEM AND UMICORE MODEL DNX-1029 SELECTIVE CATALYTIC REDUCTION (SCR) SYSTEM

## PERMIT UNIT REQUIREMENTS

- 1. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
- 2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
- 3. The unit shall only be fired on PUC-quality natural gas. [District Rules 2201, 4320, and 4801] Federally Enforceable Through Title V Permit
- 4. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of fuel combusted in the unit shall be installed, utilized and maintained. [District Rules 2201, 4305, 4306, and 4320, and 40 CFR 60.48c(g)] Federally Enforceable Through Title V Permit
- 5. During startup or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 6. The total duration of startup events shall not exceed either of the following limits: 2.0 hour/day or 104 hour/year. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 7. The total duration of shutdown events shall not exceed either of the following limits: 0.5 hour/day or 26 hour/year. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 8. During startup, NOx emissions shall not exceed 50 ppmvd @ 3% O2 (equivalent to 0.061 lb/MMBtu). [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 9. During shutdown, NOx emissions shall not exceed 30 ppmvd @ 3% O2 (equivalent to 0.036 lb/MMBtu). [District Rule 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 10. Except during startup and shutdown, NOx emissions shall not exceed 2.5 ppmvd @ 3% O2 (equivalent to 0.0030 lb/MMBtu), referenced as NO2. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 11. During shutdown, CO emissions shall not exceed 200 ppmvd @ 3% O2 (equivalent to 0.148 lb/MMBtu). [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 12. Except during shutdown, CO emissions shall not exceed 50 ppmvd @ 3% O2 (equivalent to 0.037 lb/MMBtu). [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 13. SOx emissions shall not exceed 0.00285 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
- 14. PM10 emissions shall not exceed 0.003 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

Facility Name: PACIFIC SOUTHWEST CONTAINER, LLC Location: 671 MARIPOSA RD, MODESTO, CA

N-8044-4-2 : Sep 2 2021 11:34AM -- MUTHANAM

- 15. VOC emissions shall not exceed 0.0055 lb/MMBtu, referenced as methane. [District Rule 2201] Federally Enforceable Through Title V Permit
- 16. NH3 emissions from the SCR system shall not exceed 10 ppmvd @ 3% O2. [District Rule 2201] Federally Enforceable Through Title V Permit
- 17. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
- 18. Source testing to measure NOx, CO, and NH3 emissions during steady state operation from this unit while fired on natural gas shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 19. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 20. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 21. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 22. Source testing for NH3 emissions shall be conducted utilizing BAAQMD Method ST-1B. [District Rule 2201] Federally Enforceable Through Title V Permit
- 23. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 24. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4320. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 25. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 26. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
- 27. The permittee shall monitor and record the stack concentration of NOx, CO, NH3 and O2 at least once during each month in which source testing is not performed. NOx, CO and O2 monitoring shall be conducted utilizing a portable analyzer that meets District specifications. NH3 monitoring shall be conducted utilizing Draeger tubes or a District approved equivalent method. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless it has been performed within the last month. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

PERMITUNIT REQUIREMENTS CONTINUE ON NEXT PAGE These terms and conditions are part of the Facility-wide Permit to Operate.

Facility Name: PACIFIC SOUTHWEST CONTAINER, LLC 671 MARIPOSA RD, MODESTO, CA Location:

N-8044-4-2 : Sep 2 2021 11:34AM -- MUTHANAN

- 28. If the NOx, CO or NH3 concentrations, as measured by the portable analyzer or the District approved ammonia monitoring equipment, exceed the permitted levels the permittee shall return the emissions to compliant levels as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer or the ammonia monitoring equipment continue to show emission limit violations after 1 hour of operation following detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation that is subject to enforcement action has occurred. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
- 29. All NOx, CO, O2 and ammonia emission readings shall be taken with the unit operating at conditions representative of normal operation or under the conditions specified in the Permit to Operate. The NOx, CO and O2 analyzer as well as the NH3 emission monitoring equipment shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Analyzer readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
- 30. Ammonia emission readings shall be conducted at the time the NOx, CO and O2 readings are taken. The readings shall be converted to ppmvd @ 3% O2. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
- 31. The permittee shall maintain records of: (1) the date and time of NOx, CO, NH3 and O2 measurements, (2) the O2 concentration in percent by volume and the measured NOx, CO and NH3 concentrations corrected to 3% O2, (3) make and model of the portable analyzer, (4) portable analyzer calibration records, (5) the method of determining the NH3 emission concentration, and (6) a description of any corrective action taken to maintain the emissions at or below the acceptable levels. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
- 32. Permittee shall determine sulfur content of combusted gas annually or shall demonstrate that the combusted gas is provided from a PUC or FERC regulated source. [District Rules 1081 and 4320] Federally Enforceable Through Title V Permit
- 33. Valid purchase contracts, supplier certifications, tariff sheets, or transportation contracts may be used to satisfy the fuel sulfur content analysis, provided they establish the fuel sulfur concentration and higher heating value. [District Rule 4320] Federally Enforceable Through Title V Permit
- 34. The permittee shall maintain daily records of the type and quantity of fuel combusted by the boiler. [40 CFR 60.48c(g)] Federally Enforceable Through Title V Permit
- 35. The owner or operator shall maintain records of the date, total duration of startup time (hours per day), total duration of shutdown time (hours per day), total duration of startup time per year (hours per year), and total duration of shutdown time per year (hours per year). The annual records shall be updated at least on a monthly basis. [District Rules 2201, 4306, and 43201 Federally Enforceable Through Title V Permit
- 36. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

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

Facility Name: PACIFIC SOUTHWEST CONTAINER, LLC 671 MARIPOSA RD, MODESTO, CA Location: N-8044-4-2 : Sep 2 2021 11:34AM -- MUTHANAN

**PERMIT UNIT:** N-8044-5-1

EXPIRATION DATE: 08/31/2024

#### **EQUIPMENT DESCRIPTION:**

GRAPHIC ARTS PRINTING OPERATION CONSISTING OF A 7-COLOR BOBST MODEL FFG 1228 NT RAPIDSET NON-HEATSET FLEXOGRAPHIC PRINTER WITH FOLDER, GLUER, AND A ROTARY DIE-CUTTER (REVISED 10/18/18)

## PERMIT UNIT REQUIREMENTS

- 1. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
- 2. 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
- 3. VOC emissions from this permit unit shall not exceed 32.3 pounds in any one day and 8,076 pounds in any one calendar year. [District Rule 2201] Federally Enforceable Through Title V Permit
- 4. 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] Federally Enforceable Through Title V Permit
- 5. 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] Federally Enforceable Through Title V Permit
- 6. Low-End Graphics print jobs are print jobs that does not qualify the definition of High-End Graphic print jobs. [District Rule 2201] Federally Enforceable Through Title V Permit
- 7. 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
- 8. 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
- 9. 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, handheld spray bottles; non-atomized solvent flow method, or solvent flushing method. [District Rule 4607] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

Facility Name: PACIFIC SOUTHWEST CONTAINER, LLC Location: 671 MARIPOSA RD, MODESTO, CA

N-8044-5-1 : Sep 2 2021 11:34AM -- MUTHANAN

- 10. 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
- 11. 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
- 12. 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] Federally Enforceable Through Title V Permit
- 13. 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
- 14. 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
- 15. 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] Federally Enforceable Through Title V Permit
- 16. Records of the cumulative annual VOC emissions from this unit shall be kept. The record shall be updated at least monthly. [District Rule 2201] Federally Enforceable Through Title V Permit
- 17. 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

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

Facility Name: PACIFIC SOUTHWEST CONTAINER, LLC Location: 671 MARIPOSA RD, MODESTO, CA
N-8044-5-1: Sep 2 2021 11:34AM -- MUTHANAM

**PERMIT UNIT:** N-8044-6-2

EXPIRATION DATE: 08/31/2024

#### **EQUIPMENT DESCRIPTION:**

STARCH RECEIVING AND STORAGE OPERATION CONSISTING OF A STORAGE SILO EQUIPPED WITH A C.P.E. FILTERS INC. MODEL 36-CBFB-009-C-23I BIN VENT FILTER SYSTEM

## PERMIT UNIT REQUIREMENTS

- 1. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
- 2. Visible emissions from the bin vent filter serving the starch receiving and storage operation shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
- 3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
- 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] Federally Enforceable Through Title V Permit
- 5. The bin vent filter shall be maintained and operated according to manufacturer's specifications. [District Rule 2201] Federally Enforceable Through Title V Permit
- 6. The cleaning frequency and duration for the bin vent filter shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
- 7. Material removed from the bin vent filter system shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
- 8. A spare set of bags shall be maintained on the premises at all times. [District Rule 2201]
- 9. Bin vent filter shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter breakthrough and shall be replaced as needed. [District Rule 2201] Federally Enforceable Through Title V Permit
- 10. The bin vent filter system shall be equipped with a pressure differential gauge to indicate the pressure drop across the filters. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201] Federally Enforceable Through Title V Permit
- 11. When in operation, the differential pressure of the bin vent filter shall not be less than 0.5 inches water column nor greater than 8 inches water column. [District Rule 2201] Federally Enforceable Through Title V Permit
- 12. The quantity of starch loaded into the storage silo shall not exceed 50 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
- 13. PM10 emissions from the starch receiving and storage operation shall not exceed 0.00238 pounds per ton of starch loaded into the silo. [District Rule 2201] Federally Enforceable Through Title V Permit
- 14. Differential operating pressure of the bin vent filter system shall be monitored and recorded on each day that it operates. [District Rule 2201] Federally Enforceable Through Title V Permit
- 15. Records of all maintenance of the bin vent filter system, including all change outs of bags or filter media, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit

  PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

Facility Name: PACIFIC SOUTHWEST CONTAINER, LLC Location: 671 MARIPOSA RD, MODESTO, CA

N-8044-6-2 : Sep 2 2021 11:34AM -- MUTHANAM

- 16. Permittee shall keep daily records of the quantity of starch loaded into the silo, in tons. [District Rule 2201] Federally Enforceable Through Title V Permit
- 17. All records shall be maintained and retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit

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

Facility Name: PACIFIC SOUTHWEST CONTAINER, LLC Location: 671 MARIPOSA RD,MODESTO, CA
N-8044-8-2: Sep 2 2021 11:34AM -- MUTHANAM

**PERMIT UNIT:** N-8044-7-1

EXPIRATION DA

#### **EQUIPMENT DESCRIPTION:**

CORRUGATED CARDBOARD MANUFACTURING OPERATION CONSISTING OF A FOSBER MODEL CORRUGATOR INCLUDING TWO SINGLE FACER UNITS, ONE DUAL ARCH GLUING UNIT, ONE PRE-HEATER, ONE CREST GLUING UNIT, ONE DOUBLE FACER UNIT, ONE ROTARY SHEAR UNIT, ONE SLITTER UNIT WITH WEB DIVERTER, ONE CUT OFF UNIT, AND ONE DOUBLE DOWN STACKER UNIT

## PERMIT UNIT REQUIREMENTS

- {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102] 1.
- 2. Only single-wall or double-wall corrugated board shall be produced utilizing the equipment under this permit unit. [District Rule 2201] Federally Enforceable Through Title V Permit
- 3. VOC emissions shall not exceed 1.0 pounds per million square feet of single-wall corrugated board produced. [District Rule 2201] Federally Enforceable Through Title V Permit
- VOC emissions shall not exceed 3.5 pounds per million square feet of double-wall corrugated board produced. [District Rule 2201] Federally Enforceable Through Title V Permit
- The total amount of corrugated board produced under this permit unit shall not exceed 13,000,000 square feet per day. [District Rule 2201] Federally Enforceable Through Title V Permit
- The total amount of single-wall corrugated board produced under this permit unit shall not exceed 1,980,000,000 square feet per year. [District Rule 2201] Federally Enforceable Through Title V Permit
- The total amount of double-wall corrugated board produced under this permit unit shall not exceed 220,000,000 square feet per year. [District Rule 2201] Federally Enforceable Through Title V Permit
- The cornstarch-based adhesive and each of other adhesives shall not contain any VOC containing ingredient. Permittee shall keep sufficient records (e.g. safety data sheets or product data sheets with VOC content information, manufacturer supplied documents, etc.) to demonstrate compliance with this requirement. [District Rule 2201] Federally Enforceable Through Title V Permit
- Permittee shall keep the following daily records: a) date, b) type of board produced, and c) total amount of corrugated board produced under this permit unit, in unit of million square feet. [District Rule 2201] Federally Enforceable Through Title V Permit
- 10. Permittee shall keep cumulative annual record of total amount of each type of corrugated board produced under this permit unit, in unit of million square feet. The records shall be updated at least monthly. [District Rule 2201] Federally Enforceable Through Title V Permit
- 11. All records shall be maintained and retained on-site for a period of at least five years and shall be made available to the District, ARB and EPA inspection upon request. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit

These terms and conditions acility-wide Permit to Operate.

Facility Name: PACIFIC SOUTHWEST CONTAINER, LLC 671 MARIPOSA RD, MODESTO, CA Location: N-8044-7-1 : Sep 2 2021 11:34AM -- MUTHANAM

**PERMIT UNIT:** N-8044-8-1

EXPIRATION DATE: 08/31/2024

#### **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

## PERMIT UNIT REQUIREMENTS

- 1. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
- 2. 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
- 3. VOC emissions from this permit unit shall not exceed 19.6 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
- 4. VOC emissions from this permit unit shall not exceed 4,900 pounds on a rolling 12-month basis. [District Rule 2201] Federally Enforceable Through Title V Permit
- 5. 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] Federally Enforceable Through Title V Permit
- 6. 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] Federally Enforceable Through Title V Permit
- 7. Low-End Graphics print jobs are print jobs that do not qualify as High-End Graphic print jobs. [District Rule 2201] Federally Enforceable Through Title V Permit
- 8. 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
- 9. 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
- 10. 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, handheld spray bottles; non-atomized solvent flow method, or solvent flushing method. [District Rule 4607] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

Facility Name: PACIFIC SOUTHWEST CONTAINER, LLC Location: 671 MARIPOSA RD, MODESTO, CA

N-8044-8-1 : Sep 2 2021 11:34AM -- MUTHANAN

- 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 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
- 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] Federally Enforceable Through Title V Permit
- 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] Federally Enforceable Through Title V Permit
- 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 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
- 15. 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
- 16. 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] Federally Enforceable Through Title V Permit
- 17. 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] Federally Enforceable Through Title V Permit
- 18. 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

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

Facility Name: PACIFIC SOUTHWEST CONTAINER, LLC 671 MARIPOSA RD, MODESTO, CA Location: N-8044-8-1 : Sep 2 2021 11:34AM -- MUTHANAM

**PERMIT UNIT:** N-8044-9-1

EXPIRATION DATE: 08/31/2024

#### **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 (S-924)

## PERMIT UNIT REQUIREMENTS

- 1. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
- 2. 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
- 3. VOC emissions from this permit unit shall not exceed any of the following limits: 32.0 lb/day and 7,976 lb/year (12-month rolling total). [District Rule 2201] Federally Enforceable Through Title V Permit
- 4. The combined total VOC emissions from permits units N-8044-9, N-8044-10 and N-8044-11 shall not exceed 13,012 lb/year (12-month rolling total). [District Rule 2201] Federally Enforceable Through Title V Permit
- 5. 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] Federally Enforceable Through Title V Permit
- 6. 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] Federally Enforceable Through Title V Permit
- 7. Low-End Graphics print jobs are print jobs that are not High-End Graphic print jobs as defined in this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
- 8. 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
- 9. 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
- 10. 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, handheld spray bottles; non-atomized solvent flow method, or solvent flushing method. [District Rule 4607] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

Facility Name: PACIFIC SOUTHWEST CONTAINER, LLC Location: 671 MARIPOSA RD, MODESTO, CA

N-8044-9-1 : Sep 2 2021 11:35AM -- MUTHANAM

- 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 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
- 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] Federally Enforceable Through Title V Permit
- 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 Rule 4607] Federally Enforceable Through Title V Permit
- 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 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
- 15. 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
- 16. Permittee shall maintain records of the daily VOC emissions 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
- 17. 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
- 18. On a monthly basis, the permittee shall calculate and record the annual VOC emissions in pounds from this permit by summing the VOC emissions from the previous 12 months. [District Rule 2201] Federally Enforceable Through Title V Permit
- 19. On a monthly basis, the permittee shall calculate and record the total annual VOC emissions in pounds from permits N-8044-9, N-8044-10 and N-8044-11 by summing the VOC emissions from the previous 12 months. [District Rule 2201] Federally Enforceable Through Title V Permit
- 20. 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

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

Facility Name: PACIFIC SOUTHWEST CONTAINER, LLC 671 MARIPOSA RD, MODESTO, CA N-8044-9-1 : Sep 2 2021 11:35AM -- MUTHANAM

**PERMIT UNIT:** N-8044-10-1

EXPIRATION DATE: 08/31/2024

#### **EQUIPMENT DESCRIPTION:**

GRAPHIC ARTS PRINTING OPERATION CONSISTING OF A 5-COLOR MARTIN MODEL 1628 FLEXOGRAPHIC PRINTER WITH FOLDER, GLUER, AND ROTARY DIE-CUTTER

## PERMIT UNIT REQUIREMENTS

- 1. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
- 2. 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
- 3. VOC emissions from this permit unit shall not exceed any of the following limits: 19.5 lb/day and 4,874 lb/year (12-month rolling total). [District Rule 2201] Federally Enforceable Through Title V Permit
- 4. The combined total VOC emissions from permits units N-8044-9, N-8044-10 and N-8044-11 shall not exceed 13,012 lb/year (12-month rolling total). [District Rule 2201] Federally Enforceable Through Title V Permit
- 5. 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] Federally Enforceable Through Title V Permit
- 6. 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] Federally Enforceable Through Title V Permit
- 7. Low-End Graphics print jobs are print jobs that are not High-End Graphic print jobs as defined in this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
- 8. 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
- 9. 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
- 10. 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, handheld spray bottles; non-atomized solvent flow method, or solvent flushing method. [District Rule 4607] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

Facility Name: PACIFIC SOUTHWEST CONTAINER, LLC Location: 671 MARIPOSA RD, MODESTO, CA

N-8044-10-1 : Sep 2 2021 11:35AM -- MUTHANAN

- 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 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
- 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] Federally Enforceable Through Title V Permit
- 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 Rule 4607] Federally Enforceable Through Title V Permit
- 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 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
- 15. 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
- 16. Permittee shall maintain records of the daily VOC emissions 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
- 17. 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
- 18. On a monthly basis, the permittee shall calculate and record the annual VOC emissions in pounds from this permit by summing the VOC emissions from the previous 12 months. [District Rule 2201] Federally Enforceable Through Title V Permit
- 19. On a monthly basis, the permittee shall calculate and record the total annual VOC emissions in pounds from permits N-8044-9, N-8044-10 and N-8044-11 by summing the VOC emissions from the previous 12 months. [District Rule 2201] Federally Enforceable Through Title V Permit
- 20. 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

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

Facility Name: PACIFIC SOUTHWEST CONTAINER, LLC 671 MARIPOSA RD, MODESTO, CA N-8044-10-1 : Sep 2 2021 11:35AM -- MUTHANAN

**PERMIT UNIT:** N-8044-11-1

EXPIRATION DATE: 08/31/2024

#### **EQUIPMENT DESCRIPTION:**

GRAPHIC ARTS PRINTING OPERATION CONSISTING OF A 1-COLOR BOBST MARTIN MODEL 1628 FFG FLEXOGRAPHIC PRINTER (S/N 6506) WITH A PRINTER WITH FOLDER, GLUER, AND ROTARY DIE-CUTTER

## PERMIT UNIT REQUIREMENTS

- 1. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
- 2. 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
- 3. VOC emissions from this permit unit shall not exceed any of the following limits: 10.2 lb/day and 2,544 lb/year (12-month rolling total). [District Rule 2201] Federally Enforceable Through Title V Permit
- 4. The combined total VOC emissions from permits units N-8044-9, N-8044-10 and N-8044-11 shall not exceed 13,012 lb/year (12-month rolling total). [District Rule 2201] Federally Enforceable Through Title V Permit
- 5. 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] Federally Enforceable Through Title V Permit
- 6. 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] Federally Enforceable Through Title V Permit
- 7. Low-End Graphics print jobs are print jobs that are not High-End Graphic print jobs as defined in this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
- 8. 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
- 9. 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
- 10. 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, handheld spray bottles; non-atomized solvent flow method, or solvent flushing method. [District Rule 4607] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

Facility Name: PACIFIC SOUTHWEST CONTAINER, LLC Location: 671 MARIPOSA RD, MODESTO, CA

N-8044-11-1 : Sep 2 2021 11:35AM -- MUTHANAN

- 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 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
- 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] Federally Enforceable Through Title V Permit
- 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 Rule 4607] Federally Enforceable Through Title V Permit
- 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 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
- 15. 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
- 16. Permittee shall maintain records of the daily VOC emissions 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
- 17. 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
- 18. On a monthly basis, the permittee shall calculate and record the annual VOC emissions in pounds from this permit by summing the VOC emissions from the previous 12 months. [District Rule 2201] Federally Enforceable Through Title V Permit
- 19. On a monthly basis, the permittee shall calculate and record the total annual VOC emissions in pounds from permits N-8044-9, N-8044-10 and N-8044-11 by summing the VOC emissions from the previous 12 months. [District Rule 2201] Federally Enforceable Through Title V Permit
- 20. 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

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

Facility Name: PACIFIC SOUTHWEST CONTAINER, LLC 671 MARIPOSA RD, MODESTO, CA N-8044-11-1 : Sep 2 2021 11:35AM -- MUTHANAN

# Attachment A DETAILED FACILITY PRINTOUT

## Detailed Facility Report For Facility=8044

Sorted by Facility Name and Permit Number

8/31/21 9:13 am

PACIFIC SOUTHWEST CONTAINER, LLC 671 MARIPOSA RD MODESTO, CA			FAC # STATUS: TELEPHONE:		N 8044 A		TYPE: <b>TitleV</b> EXPIRE ON: 08/31/2024 TOXIC ID: <b>71078</b> AREA: 5 / INSP. DATE: 08/21	
PERMIT NUMBER	FEE DESCRIPTION	FEE RULE	QTY	FEE AMOUNT	FEE TOTAL	PERMIT STATUS	EQUIPMENT DESCRIPTION	
N-8044-1-0	288 bhp	3020-10 C	1	290.00	290.00	D	288 BHP CUMMINS MODEL CFP83 F40 TIER 2 CERTIFIED DIESEL- FIRED EMERGENCY IC ENGINE POWERING A FIREWATER PUMP *** PERMIT DELETED - FJCRUZ 8/26/2019 ***	
N-8044-2-0	305 bhp	3020-10 C	1	290.00	290.00	Α	305 BHP CUMMINS MODEL CFP9E-F30 DIESEL FIRED EMERGENCY ENGINE (TIER 3 CERTIFIED) POWERING A FIRE PUMP.	
N-8044-3-0	607 hp electric motors	3020-01 F	1	731.00	731.00	Α	GRAPHIC ARTS PRINTING OPERATION CONSISTING OF A 5-COLOR BOBST MODEL DRO 1632 RS NON-HEATSET FLEXOGRAPHIC PRINTER WITH FOLDER, GLUER, AND A ROTARY DIE-CUTTER	
N-8044-4-0	29.8 MMBtu/hr boiler	3020-02 H	1	1,238.00	1,238.00	Α	29.8 MMBTU/HR CLEAVER BROOKS BOILER EQUIPPED WITH CBEX ELITE LOW NOX BURNER SYSTEM AND UMICORE MODEL DNX-1029 SELECTIVE CATALYTIC REDUCTION (SCR) SYSTEM (OR EQUIVALENT MAKE AND MODEL OF BOILER AND SCR SYSTEM)	
N-8044-5-0	Total of 594 hp	3020-01 F	1	731.00	731.00	A	GRAPHIC ARTS PRINTING OPERATION CONSISTING OF A 7-COLOR BOBST MODEL FFG 1228 NT RAPIDSET NON-HEATSET FLEXOGRAPHIC PRINTER WITH FOLDER, GLUER, AND A ROTARY DIE CUTTER (REVISED 10/18/18)	
N-8044-6-1	15,697 gallon	3020-05 B	1	113.00	113.00	А	STARCH RECEIVING AND STORAGE OPERATION CONSISTING OF A STORAGE SILO EQUIPPED WITH A C.P.E. FILTERS INC. MODEL 36-CBFB-009-C-23I BIN VENT FILTER SYSTEM	
N-8044-7-0	1,869.42 hp (total)	3020-01 H	1	1,238.00	1,238.00	Α	CORRUGATED CARDBOARD MANUFACTURING OPERATION CONSISTING OF A FOSBER MODEL 111 CORRUGATOR INCLUDING TWO SINGLE FACER UNITS, ONE DUAL ARCH GLUING UNIT, ONE PRE- HEATER, ONE CREST GLUING UNIT, ONE DOUBLE FACER UNIT, ONE ROTARY SHEAR UNIT, ONE SLITTER UNIT WITH WEB DIVERTER, ONE CUT OFF UNIT, AND ONE DOUBLE DOWN STACKER UNIT	
N-8044-8-0	Total of 1,089.6 hp	3020-01 G	1	980.00	980.00	Α	GRAPHIC ARTS PRINTING OPERATION CONSISTING OF A 4-COLOR BOBST MODEL FFG 924 NT RAPIDSET NON-HEATSET FLEXOGRAPHI PRINTER WITH FOLDER, GLUER, AND ROTARY DIE-CUTTER	
N-8044-9-0	942.4 hp, electric motors	3020-01 G	1	980.00	980.00	Α	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 (S-924)	
N-8044-10-0	100 hp	3020-01 D	1	379.00	379.00	А	GRAPHIC ARTS PRINTING OPERATION CONSISTING OF A 5-COLOR MARTIN MODEL 1628 FLEXOGRAPHIC PRINTER WITH FOLDER, GLUER, AND ROTARY DIE-CUTTER	
N-8044-11-0	100 hp	3020-01 D	1	379.00	379.00	Α	GRAPHIC ARTS PRINTING OPERATION CONSISTING OF A 1-COLOR BOBST MARTIN MODEL 1628 FFG FLEXOGRAPHIC PRINTER (S/N 6506) WITH A PRINTER WITH FOLDER, GLUER, AND ROTARY DIE-CUTTER	

Number of Facilities Reported: 1

# Attachment B Exempt Equipment

The following exempt equipment was identified by the applicant on TVFORM-003, Insignificant Activities:

<b>Exemption Category</b>	Rule 2020 Citation	✓
Non-structural repairs & maintenance to permitted equipment.	7.3	✓

# Attachment C

# **Current District PTOs**

**PERMIT UNIT:** N-8044-2-0 **EXPIRATION DATE:** 08/31/2024

#### **EQUIPMENT DESCRIPTION:**

305 BHP CUMMINS MODEL CFP9E-F30 DIESEL FIRED EMERGENCY ENGINE (TIER 3 CERTIFIED) POWERING A FIRE PUMP.

## PERMIT UNIT REQUIREMENTS

- No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
- 2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
- 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]
- The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
- Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801 and 17 CCR 93115]
- This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702 and 17 CCR 93115]
- Emissions from this IC engine shall not exceed any of the following limits: 2.20 g-NOx/bhp-hr, 1.417 g-CO/bhp-hr, or 0.123 g-VOC/bhp-hr. [District Rule 2201 and 13 CCR 2423 and 17 CCR 93115]
- Emissions from this IC engine shall not exceed 0.118 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102 and 13 CCR 2423 and 17 CCR 93115]
- This engine shall be operated only for testing and maintenance of the engine, required regulatory purposes, and during emergency situations. For testing purposes, the engine shall only be operated the number of hours necessary to comply with the testing requirements of the National Fire Protection Association (NFPA) 25 - "Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems". Total hours of operation for all maintenance, testing, and required regulatory purposes shall not exceed 100 hours per calendar year. [District Rule 4702 and 17 CCR 931151
- 10. An emergency situation is an unscheduled electrical power outage caused by sudden and reasonably unforeseen natural disasters or sudden and reasonably unforeseen events beyond the control of the permittee. [District Rule 4702 and 17 CCR 93115]
- 11. The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and maintenance operations, and the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.). For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rule 4702 and 17 CCR 931151
- 12. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 4702 and 17 CCR 93115]

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

Facility Name: PACIFIC SOUTHWEST CONTAINER, LLC Location: 671 MARIPOSA RD, MODESTO, CA N-8044-2-0 : Sep 2 2021 11:27AM -- MUTHANAM

**PERMIT UNIT:** N-8044-3-0 **EXPIRATION DATE:** 08/31/2024

#### **EQUIPMENT DESCRIPTION:**

GRAPHIC ARTS PRINTING OPERATION CONSISTING OF A 5-COLOR BOBST MODEL DRO 1632 RS NON-HEATSET FLEXOGRAPHIC PRINTER WITH FOLDER, GLUER, AND A ROTARY DIE-CUTTER

# PERMIT UNIT REQUIREMENTS

- 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]
- 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]
- VOC emissions from this permit unit shall not exceed any of the following limits: 16.7 lb/day and 5,817 lb/year (12month rolling total). [District Rule 2201]
- 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]
- 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]
- 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]
- Low-End Graphics print jobs are print jobs that does not qualify the definition of High-End Graphic print jobs. [District Rule 2201]
- 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]
- 10. 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, handheld spray bottles; non-atomized solvent flow method, or solvent flushing method. [District Rule 4607]

Facility Name: PACIFIC SOUTHWEST CONTAINER, LLC Location: 671 MARIPOSA RD, MODESTO, CA N-8044-3-0: Sep 2 2021 11:27AM -- MUTHANAM

- 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 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]
- 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. 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]
- 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 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]
- 15. 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]
- 16. 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]
- 17. On a monthly basis, the permittee shall calculate and record the monthly VOC emissions in pounds from this permit unit. [District Rule 2201]
- 18. 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]
- 19. 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]

PERMIT UNIT: N-8044-4-0 EXPIRATION DATE: 08/31/2024

#### **EQUIPMENT DESCRIPTION:**

29.47 MMBTU/HR CLEAVER BROOKS MODEL CBEX-E 700-722-250ST NATURAL GAS-FIRED BOILER EQUIPPED WITH A CBEX ELITE LOW NOX BURNER SYSTEM AND UMICORE MODEL DNX-1029 SELECTIVE CATALYTIC REDUCTION (SCR) SYSTEM

## PERMIT UNIT REQUIREMENTS

- 1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
- 2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
- 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. The unit shall only be fired on PUC-quality natural gas. [District Rules 2201, 4320, and 4801]
- 5. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of fuel combusted in the unit shall be installed, utilized and maintained. [District Rules 2201, 4305, 4306, and 4320, and 40 CFR 60.48c(g)]
- 6. During startup or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. [District Rules 2201, 4305, 4306, and 4320]
- 7. The total duration of startup events shall not exceed either of the following limits: 2.0 hour/day or 104 hour/year. [District Rules 2201, 4305, 4306, and 4320]
- 8. The total duration of shutdown events shall not exceed either of the following limits: 0.5 hour/day or 26 hour/year. [District Rules 2201, 4305, 4306, and 4320]
- 9. During startup, NOx emissions shall not exceed 50 ppmvd @ 3% O2 (equivalent to 0.061 lb/MMBtu). [District Rules 2201, 4305, 4306, and 4320]
- 10. During shutdown, NOx emissions shall not exceed 30 ppmvd @ 3% O2 (equivalent to 0.036 lb/MMBtu). [District Rule 2201, 4305, 4306, and 4320]
- 11. Except during startup and shutdown, NOx emissions shall not exceed 2.5 ppmvd @ 3% O2 (equivalent to 0.0030 lb/MMBtu), referenced as NO2. [District Rules 2201, 4305, 4306, and 4320]
- 12. During shutdown, CO emissions shall not exceed 200 ppmvd @ 3% O2 (equivalent to 0.148 lb/MMBtu). [District Rules 2201, 4305, 4306, and 4320]
- 13. Except during shutdown, CO emissions shall not exceed 50 ppmvd @ 3% O2 (equivalent to 0.037 lb/MMBtu). [District Rules 2201, 4305, 4306, and 4320]
- 14. SOx emissions shall not exceed 0.00285 lb/MMBtu. [District Rule 2201]
- 15. PM10 emissions shall not exceed 0.003 lb/MMBtu. [District Rule 2201]
- 16. VOC emissions shall not exceed 0.0055 lb/MMBtu, referenced as methane. [District Rule 2201]
- 17. NH3 emissions from the SCR system shall not exceed 10 ppmvd @ 3% O2. [District Rule 2201]

Facility Name: PACIFIC SOUTHWEST CONTAINER, LLC Location: 671 MARIPOSA RD, MODESTO, CA
N-8044-4-0: Sep 2 2021 11:27AM - MUTHANAM

- 18. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081]
- 19. Source testing to measure NOx, CO, and NH3 emissions during steady state operation from this unit while fired on natural gas shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 2201, 4305, 4306, and 4320]
- 20. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306, and 4320]
- 21. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306, and 4320]
- 22. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306, and 4320]
- 23. Source testing for NH3 emissions shall be conducted utilizing BAAQMD Method ST-1B. [District Rule 2201]
- 24. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306, and 4320]
- 25. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4320. [District Rules 4305, 4306, and 4320]
- 26. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306, and 4320]
- 27. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081]
- 28. The permittee shall monitor and record the stack concentration of NOx, CO, NH3 and O2 at least once during each month in which source testing is not performed. NOx, CO and O2 monitoring shall be conducted utilizing a portable analyzer that meets District specifications. NH3 monitoring shall be conducted utilizing Draeger tubes or a District approved equivalent method. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless it has been performed within the last month. [District Rules 4305, 4306 and 4320]
- 29. If the NOx, CO or NH3 concentrations, as measured by the portable analyzer or the District approved ammonia monitoring equipment, exceed the permitted levels the permittee shall return the emissions to compliant levels as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer or the ammonia monitoring equipment continue to show emission limit violations after 1 hour of operation following detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation that is subject to enforcement action has occurred. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306 and 4320]
- 30. All NOx, CO, O2 and ammonia emission readings shall be taken with the unit operating at conditions representative of normal operation or under the conditions specified in the Permit to Operate. The NOx, CO and O2 analyzer as well as the NH3 emission monitoring equipment shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Analyzer readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306 and 4320]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE These terms and conditions are part of the Facility-wide Permit to Operate.

Facility Name: PACIFIC SOUTHWEST CONTAINER, LLC Location: 671 MARIPOSA RD, MODESTO, CA
N-8044-4-0: Sep 2 2021 11:27AM - MUTHANAM

- 31. Ammonia emission readings shall be conducted at the time the NOx, CO and O2 readings are taken. The readings shall be converted to ppmvd @ 3% O2. [District Rules 4305, 4306 and 4320]
- 32. The permittee shall maintain records of: (1) the date and time of NOx, CO, NH3 and O2 measurements, (2) the O2 concentration in percent by volume and the measured NOx, CO and NH3 concentrations corrected to 3% O2, (3) make and model of the portable analyzer, (4) portable analyzer calibration records, (5) the method of determining the NH3 emission concentration, and (6) a description of any corrective action taken to maintain the emissions at or below the acceptable levels. [District Rules 4305, 4306 and 4320]
- 33. Permittee shall determine sulfur content of combusted gas annually or shall demonstrate that the combusted gas is provided from a PUC or FERC regulated source. [District Rules 1081 and 4320]
- 34. Valid purchase contracts, supplier certifications, tariff sheets, or transportation contracts may be used to satisfy the fuel sulfur content analysis, provided they establish the fuel sulfur concentration and higher heating value. [District Rule 4320]
- 35. The permittee shall maintain daily records of the type and quantity of fuel combusted by the boiler. [40 CFR 60.48c(g)]
- 36. The owner or operator shall maintain records of the date, total duration of startup time (hours per day), total duration of shutdown time (hours per day), total duration of startup time per year (hours per year), and total duration of shutdown time per year (hours per year). The annual records shall be updated at least on a monthly basis. [District Rules 2201, 4306, and 4320]
- 37. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320]

**PERMIT UNIT:** N-8044-5-0 **EXPIRATION DATE:** 08/31/2024

#### **EQUIPMENT DESCRIPTION:**

GRAPHIC ARTS PRINTING OPERATION CONSISTING OF A 7-COLOR BOBST MODEL FFG 1228 NT RAPIDSET NON-HEATSET FLEXOGRAPHIC PRINTER WITH FOLDER, GLUER, AND A ROTARY DIE-CUTTER (REVISED 10/18/18)

# PERMIT UNIT REQUIREMENTS

- 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]
- 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]
- VOC emissions from this permit unit shall not exceed 32.3 pounds in any one day and 8,076 pounds in any one calendar vear. [District Rule 2201]
- 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]
- 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]
- Low-End Graphics print jobs are print jobs that does not qualify the definition of High-End Graphic print jobs. [District Rule 2201]
- 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]
- 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]
- 10. 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, handheld spray bottles; non-atomized solvent flow method, or solvent flushing method. [District Rule 4607]

Facility Name: PACIFIC SOUTHWEST CONTAINER, LLC Location: 671 MARIPOSA RD, MODESTO, CA N-8044-5-0 : Sep 2 2021 11:27AM -- MUTHANAM

- 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 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]
- 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. 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 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]
- 15. 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]
- 16. 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]
- 17. Records of the cumulative annual VOC emissions from this unit shall be kept. The record shall be updated at least monthly. [District Rule 2201]
- 18. 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]

PERMIT UNIT: N-8044-6-1 EXPIRATION DATE: 08/31/2024

#### **EQUIPMENT DESCRIPTION:**

STARCH RECEIVING AND STORAGE OPERATION CONSISTING OF A STORAGE SILO EQUIPPED WITH A C.P.E. FILTERS INC. MODEL 36-CBFB-009-C-23I BIN VENT FILTER SYSTEM

# PERMIT UNIT REQUIREMENTS

- 1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
- 2. Visible emissions from the bin vent filter serving the starch receiving and storage operation shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201]
- 3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
- 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. The bin vent filter shall be maintained and operated according to manufacturer's specifications. [District Rule 2201]
- 6. The cleaning frequency and duration for the bin vent filter shall be adjusted to optimize the control efficiency. [District Rule 2201]
- 7. Material removed from the bin vent filter system shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201]
- 8. A spare set of bags shall be maintained on the premises at all times. [District Rule 2201]
- 9. Bin vent filter shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter breakthrough and shall be replaced as needed. [District Rule 2201]
- 10. The bin vent filter system shall be equipped with a pressure differential gauge to indicate the pressure drop across the filters. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201]
- 11. When in operation, the differential pressure of the bin vent filter shall not be less than 0.5 inches water column nor greater than 8 inches water column. [District Rule 2201]
- 12. The quantity of starch loaded into the storage silo shall not exceed 50 tons in any one day. [District Rule 2201]
- 13. PM10 emissions from the starch receiving and storage operation shall not exceed 0.00238 pounds per ton of starch loaded into the silo. [District Rule 2201]
- 14. Differential operating pressure of the bin vent filter system shall be monitored and recorded on each day that it operates. [District Rule 2201]
- 15. Records of all maintenance of the bin vent filter system, including all change outs of bags or filter media, shall be maintained. [District Rule 2201]
- 16. Permittee shall keep daily records of the quantity of starch loaded into the silo, in tons. [District Rule 2201]
- 17. All records shall be maintained and retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 1070 and 2201]

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

**PERMIT UNIT:** N-8044-7-0 **EXPIRATION DATE:** 08/31/2024

#### **EQUIPMENT DESCRIPTION:**

CORRUGATED CARDBOARD MANUFACTURING OPERATION CONSISTING OF A FOSBER MODEL 111 CORRUGATOR INCLUDING TWO SINGLE FACER UNITS, ONE DUAL ARCH GLUING UNIT, ONE PRE-HEATER, ONE CREST GLUING UNIT, ONE DOUBLE FACER UNIT, ONE ROTARY SHEAR UNIT, ONE SLITTER UNIT WITH WEB DIVERTER, ONE CUT OFF UNIT, AND ONE DOUBLE DOWN STACKER UNIT

## PERMIT UNIT REQUIREMENTS

- 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. Only single-wall or double-wall corrugated board shall be produced utilizing the equipment under this permit unit. [District Rule 2201]
- 4. VOC emissions shall not exceed 1.0 pounds per million square feet of single-wall corrugated board produced. [District Rule 2201]
- 5. VOC emissions shall not exceed 3.5 pounds per million square feet of double-wall corrugated board produced. [District Rule 2201]
- 6. The total amount of corrugated board produced under this permit unit shall not exceed 13,000,000 square feet per day. [District Rule 2201]
- 7. The total amount of single-wall corrugated board produced under this permit unit shall not exceed 1,980,000,000 square feet per year. [District Rule 2201]
- 8. The total amount of double-wall corrugated board produced under this permit unit shall not exceed 220,000,000 square feet per year. [District Rule 2201]
- 9. The cornstarch-based adhesive and each of other adhesives shall not contain any VOC containing ingredient. Permittee shall keep sufficient records (e.g. safety data sheets or product data sheets with VOC content information, manufacturer supplied documents, etc.) to demonstrate compliance with this requirement. [District Rule 2201]
- 10. Permittee shall keep the following daily records: a) date, b) type of board produced, and c) total amount of corrugated board produced under this permit unit, in unit of million square feet. [District Rule 2201]
- 11. Permittee shall keep cumulative annual record of total amount of each type of corrugated board produced under this permit unit, in unit of million square feet. The records shall be updated at least monthly. [District Rule 2201]
- 12. All records shall be maintained and retained on-site for a period of at least five years and shall be made available to the District, ARB and EPA inspection upon request. [District Rules 1070 and 2201]

Facility Name: PACIFIC SOUTHWEST CONTAINER, LLC Location: 671 MARIPOSA RD, MODESTO, CA N-8044-70. Sep 2 2021 11:28AM -- MUTHANAM

**PERMIT UNIT:** N-8044-8-0 **EXPIRATION DATE:** 08/31/2024

#### **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

## PERMIT UNIT REQUIREMENTS

- 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. 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]
- 4. VOC emissions from this permit unit shall not exceed 19.6 pounds in any one day. [District Rule 2201]
- 5. VOC emissions from this permit unit shall not exceed 4,900 pounds on a rolling 12-month basis. [District Rule 2201]
- 6. 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]
- 7. 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]
- 8. Low-End Graphics print jobs are print jobs that do not qualify as High-End Graphic print jobs. [District Rule 2201]
- 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]
- 10. 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]
- 11. 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, handheld spray bottles; non-atomized solvent flow method, or solvent flushing method. [District Rule 4607]

Facility Name: PACIFIC SOUTHWEST CONTAINER, LLC Location: 671 MARIPOSA RD, MODESTO, CA
N-8044-8-0: Sep 2 2021 11:28AM -- MUTHANAM

- 12. 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]
- 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. 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]
- 15. 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]
- 16. 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]
- 17. 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]
- 18. 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]
- 19. 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]

**PERMIT UNIT:** N-8044-9-0 **EXPIRATION DATE:** 08/31/2024

#### **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 (S-924)

### PERMIT UNIT REQUIREMENTS

- 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. 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]
- 4. VOC emissions from this permit unit shall not exceed any of the following limits: 32.0 lb/day and 7,976 lb/year (12-month rolling total). [District Rule 2201]
- 5. The combined total VOC emissions from permits units N-8044-9, N-8044-10 and N-8044-11 shall not exceed 13,012 lb/year (12-month rolling total). [District Rule 2201]
- 6. 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]
- 7. 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]
- 8. Low-End Graphics print jobs are print jobs that are not High-End Graphic print jobs as defined in this permit. [District Rule 2201]
- 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]
- 10. 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]
- 11. 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, handheld spray bottles; non-atomized solvent flow method, or solvent flushing method. [District Rule 4607]

Facility Name: PACIFIC SOUTHWEST CONTAINER, LLC Location: 671 MARIPOSA RD, MODESTO, CA N-8044-90. Sep 2 2021 11:28AM -- MUTHANAM

**PERMIT UNIT:** N-8044-10-0 **EXPIRATION DATE:** 08/31/2024

#### **EQUIPMENT DESCRIPTION:**

GRAPHIC ARTS PRINTING OPERATION CONSISTING OF A 5-COLOR MARTIN MODEL 1628 FLEXOGRAPHIC PRINTER WITH FOLDER, GLUER, AND ROTARY DIE-CUTTER

## PERMIT UNIT REQUIREMENTS

- 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. 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]
- 4. VOC emissions from this permit unit shall not exceed any of the following limits: 19.5 lb/day and 4,874 lb/year (12-month rolling total). [District Rule 2201]
- 5. The combined total VOC emissions from permits units N-8044-9, N-8044-10 and N-8044-11 shall not exceed 13,012 lb/year (12-month rolling total). [District Rule 2201]
- 6. 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]
- 7. 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]
- 8. Low-End Graphics print jobs are print jobs that are not High-End Graphic print jobs as defined in this permit. [District Rule 2201]
- 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]
- 10. 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]
- 11. 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, handheld spray bottles; non-atomized solvent flow method, or solvent flushing method. [District Rule 4607]

Facility Name: PACIFIC SOUTHWEST CONTAINER, LLC Location: 671 MARIPOSA RD, MODESTO, CA
N-8044-10-0: Sep 2 2021 11:28AM - MUTHANAM

- 12. 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]
- 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. 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]
- 15. 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]
- 16. 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]
- 17. Permittee shall maintain records of the daily VOC emissions 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]
- 18. On a monthly basis, the permittee shall calculate and record the monthly VOC emissions in pounds from this permit unit. [District Rule 2201]
- 19. On a monthly basis, the permittee shall calculate and record the annual VOC emissions in pounds from this permit by summing the VOC emissions from the previous 12 months. [District Rule 2201]
- 20. On a monthly basis, the permittee shall calculate and record the total annual VOC emissions in pounds from permits N-8044-9, N-8044-10 and N-8044-11 by summing the VOC emissions from the previous 12 months. [District Rule 2201]
- 21. 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]

Facility Name: PACIFIC SOUTHWEST CONTAINER, LLC Location: 671 MARIPOSA RD, MODESTO, CA
N-8044-10-0: Sep 2 2021 11:28AM - MUTHANAM

- 12. 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]
- 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. 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]
- 15. 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]
- 16. 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]
- 17. Permittee shall maintain records of the daily VOC emissions 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]
- 18. On a monthly basis, the permittee shall calculate and record the monthly VOC emissions in pounds from this permit unit. [District Rule 2201]
- 19. On a monthly basis, the permittee shall calculate and record the annual VOC emissions in pounds from this permit by summing the VOC emissions from the previous 12 months. [District Rule 2201]
- 20. On a monthly basis, the permittee shall calculate and record the total annual VOC emissions in pounds from permits N-8044-9, N-8044-10 and N-8044-11 by summing the VOC emissions from the previous 12 months. [District Rule 2201]
- 21. 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]

**PERMIT UNIT:** N-8044-11-0 **EXPIRATION DATE:** 08/31/2024

#### **EQUIPMENT DESCRIPTION:**

GRAPHIC ARTS PRINTING OPERATION CONSISTING OF A 1-COLOR BOBST MARTIN MODEL 1628 FFG FLEXOGRAPHIC PRINTER (S/N 6506) WITH A PRINTER WITH FOLDER, GLUER, AND ROTARY DIE-CUTTER

## PERMIT UNIT REQUIREMENTS

- No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102] 1.
- 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]
- 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]
- VOC emissions from this permit unit shall not exceed any of the following limits: 10.2 lb/day and 2,544 lb/year (12month rolling total). [District Rule 2201]
- The combined total VOC emissions from permits units N-8044-9, N-8044-10 and N-8044-11 shall not exceed 13,012 lb/year (12-month rolling total). [District Rule 2201]
- 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]
- 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]
- 8. Low-End Graphics print jobs are print jobs that are not High-End Graphic print jobs as defined in this permit. [District Rule 2201]
- 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]
- 10. 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]
- 11. 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, handheld spray bottles; non-atomized solvent flow method, or solvent flushing method. [District Rule 4607]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE These terms and conditions are part of the Facility-wide Permit to Operate.

Facility Name: PACIFIC SOUTHWEST CONTAINER, LLC 671 MARIPOSA RD, MODESTO, CA Location:

- 12. 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]
- 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. 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]
- 15. 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]
- 16. 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]
- 17. Permittee shall maintain records of the daily VOC emissions 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]
- 18. On a monthly basis, the permittee shall calculate and record the monthly VOC emissions in pounds from this permit unit. [District Rule 2201]
- 19. On a monthly basis, the permittee shall calculate and record the annual VOC emissions in pounds from this permit by summing the VOC emissions from the previous 12 months. [District Rule 2201]
- 20. On a monthly basis, the permittee shall calculate and record the total annual VOC emissions in pounds from permits N-8044-9, N-8044-10 and N-8044-11 by summing the VOC emissions from the previous 12 months. [District Rule 2201]
- 21. 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]

Facility Name: PACIFIC SOUTHWEST CONTAINER, LLC Location: 671 MARIPOSA RD, MODESTO, CA
N-8044-11-0: Sep 2 2021 11:28AM - MUTHANAM

# Attachment D SUMMARY OF HAP EMISSION

# Summary of HAP Emissions (N-8044)

Pollutant	N-8044-2-0	N-8044-3-0	N-8044-4-0	N-8044-5-0	N-8044-8-0	N-8044-9-0, '-10 and '-11-0	Total (lb/yr)	HAP	HAP (lb/yr)
Benzene	0.3	-	1.5		<b>-</b>	-	1.8	Y	1.80
Formaldehyde	2.7		3.2	-	-		5.9	Y	5.90
PAHs	0.1	-	0	-	-	-	0.1	Y	0.10
Naphthalene	0	-	0.1	(-)	-	-	0.1	Y	0.10
Acetaldehyde	1.2	-	8.0	2,000	-	-	2.0	Y	2.00
Acrolein	0.1	-	0.7	-	-	=	8.0	Y	0.80
1,3-Butadiene	0.3	-	-	-	_	-	0.3	Y	0.30
Chlorobenzene	0		-		_	-	0.0	Y	0.00
Propylene	0.7	-	138.4	-	_	_	139.1	Y	139.10
Hexane	0	-	1.2	-	-	-	1.2	Y	1.20
Toluene	0	-	6.9	-	-	-	6.9	Y	6,90
Xylene	0.1	_	5.1	-	-		5.2	Y	5.20
Ethyl Benzene	0	_	1.8	-	(5 <del>40</del> )	-	1.8	Y	1.80
Hydrogen Chloride	0.1	-	_	-	-	-	0.1	Y	0.10
Arsenic	0	T -	-	-	-	-	0.0	Y	0.00
Cadmium	0		_	22	_		0.0	Y	0.00
Total Chromium	0		-	-	-	_	0.0	Y	0.00
Hexavalent Chromium	0		-			_	0.0	Y	0.00
Copper	0	_	-	-	-	_	0.0	Y	0.00
Lead	0	-	-	-	-	-	0.0	Y	0.00
Manganses	0	-	_	( <del></del>	(2 <del>-1</del> )		0.0	Y	0.00
Mercury	0	-	-	-	-	-	0.0	Y	0.00
Nickel	0			-	_		0.0	Y	0.00
Selenium	0	44	-	2	_		0.0	Y	0.00
Zinc	0		2		lan.	-	0.0	Y	0.00
Ammonia	-	3960	-	4400	4400	-	8360.0	N	0.00
Dipropylene glycol monomethyl ether		7.6	-		1400	-	7.6	Y	7.60
								Total:	173