

September 8, 2022

Mr. Edward Burton
Evergreen Beverage Packaging
1500 W. Main St.
Turlock, CA 95380

Re: Notice of Preliminary Decision – Title V Permit Renewal
Facility Number: N-1980
Project Number: N-1210595

Dear Mr. Burton:

Enclosed for your review and comment is the District's analysis of the application to renew the Federally Mandated Operating Permit for Evergreen Beverage Packaging at 1500 W. Main St. in Turlock, 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 renewed 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. Nick Peirce, Permit Services Manager, at (209) 557-6400.

Sincerely,



Brian Clements
Director of Permit Services

Enclosures

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

Samir Sheikh
Executive Director/Air Pollution Control Officer

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4800 Enterprise Way
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**SAN JOAQUIN VALLEY
AIR POLLUTION CONTROL DISTRICT**

**Proposed Title V Permit Renewal Evaluation
Evergreen Beverage Packaging
N-1980**

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TITLE V PERMIT RENEWAL EVALUATION

Engineer: Marisol Miranda
Date: September 8, 2022

Facility Number: N-1980
Facility Name: Evergreen Beverage Packaging
Mailing Address: 1500 West Main Street, Turlock CA 95380-3704

Contact Name: Edward Burton
Phone: 209-664-3400

Responsible Official: Edward Burton
Title: Facility Manager

Project # : N-1210595
Deemed Complete: 5/2/21

I. PROPOSAL

Evergreen Beverage Packing was issued a Title V permit on December 31, 2004. As required by District Rule 2520, the applicant is requesting a permit renewal. The existing Title V permit shall be reviewed and modified to reflect all applicable District and Federal rules that are updated, removed, or added since the issuance of the most recent title V permit renewal dated 9/21/16.

The purpose of this evaluation is to provide the legal and factual basis for all updated applicable requirements and to determine if the facility will comply with these updated requirements. It also specifically identifies all additions, deletions, and/or changes made to permit conditions or equipment descriptions.

II. FACILITY LOCATION

Evergreen Beverage Packing is located at 1500 West Main Street in Turlock, California.

III. EQUIPMENT LISTING

A detailed facility printout listing all permitted equipment at the facility is included as **Attachment C**.

IV. GENERAL PERMIT TEMPLATE USAGE

The applicant is requesting to use the following model general permit Templates:

A. Template SJV-UM-0-1 Facility Wide Umbrella

The applicant has requested to utilize template No. SJV-UM-0-3, Facility Wide Umbrella. Based on the information submitted in the Template Qualification Form, the applicant qualifies for the use of this template.

V. SCOPE OF EPA AND PUBLIC REVIEW

Certain segments of the proposed Renewed Operating Permit are based on model general permit templates that have been previously subject to EPA and public review. The terms and conditions from the model general permit templates are included in the proposed permit and are not subject to further EPA and public review.

For permit applications utilizing model general permit templates, public and agency comments on the District's proposed actions are limited to the applicant's eligibility for model general permit template, applicable requirements not covered by the model general permit template, and the applicable procedural requirements for issuance of Title V Operating Permits.

The following permit conditions, including their underlying applicable requirements, originate from model general permit templates and are not subject to further EPA or public review.

Conditions 1 through 40 of the requirements for permit unit N-1980-0-4.

VI. FEDERALLY ENFORCEABLE REQUIREMENTS

Rules Added since September 21, 2016

There are no applicable rules that were added since the last Title V renewal.

Rules Removed

- San Joaquin County Rule 110, Equipment Breakdown (rescinded from SIP February 17, 2022)

Rules Updated since September 21, 2016

- District Rule 2201, New and Modified Stationary Source Review Rule (amended August 15, 2019)
- District Rule 2520, Federally Mandated Operating Permits (amended August 15, 2019)
- District Rule 4601, Architectural Coatings (amended April 16, 2020)
- 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners (amended March 24, 2021)
- 40 CFR 82, Subpart F, Recycling and Emission Reduction (amended April 10, 2020)

Rules Not Updated since September 21, 2016

- District Rule 1070, Inspections (amended December 17, 1992)
- 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, Standards for Granting Applications (amended December 17, 1992)
- District Rule 2080, Conditional Approval (amended December 17, 1992)
- District Rule 4101, Visible Emissions (amended February 17, 2005)

- District Rule 4201, Particulate Matter Concentration (amended December 17, 1992)
- District Rule 4607, Graphic Arts and Paper, Film, Foil and Fabric Coatings (amended December 18, 2008)
- District Rule 4801, Sulfur Compounds (amended December 17, 1992)
- District Rule 8011, General Requirements (amended August 19, 2004)
- District Rule 8021, Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities (amended August 19, 2004)
- District Rule 8031, Bulk Materials (amended August 19, 2004)
- District Rule 8041, Carryout and Trackout (amended August 19, 2004)
- District Rule 8051, Open Areas (amended August 19, 2004)
- District Rule 8061, Paved and Unpaved Roads (amended August 19, 2004)
- District Rule 8071, Unpaved Vehicle/Equipment Traffic Areas (amended September 16, 2004)
- 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos (amended July 20, 2004)
- 40 CFR Part 64, Compliance Assurance Monitoring (amended October 22, 1997)

VII. 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".

For this facility, the following are not federally enforceable and will not be discussed in further detail:

A. Rules Added

There are no applicable rules that were added since the last Title V renewal.

B. Rules Not Updated

- District Rule 4102, Nuisance (December 17, 1992)

VIII. PERMIT REQUIREMENTS

The purpose of this evaluation is to review changes to federally enforceable requirements; therefore, this compliance section will only address rules that have been amended or added since the issuance of the initial Title V permit or most recent renewal of the Title V permit.

A. Stanislaus County Rule 110 – Equipment Breakdown

In accordance with EPA’s State Implementation Plan (SIP) Call on February 17, 2022, the District rescinded Stanislaus County Rule 110 from the San Joaquin Valley SIP.

Since Stanislaus County Rule 110 was removed from the SIP and District Rule 1100 for breakdowns is not SIP-approved, conditions #1 and #2 on permit N-1980-0-4 are modified to remove the reference to Stanislaus County Rule 110 and the conditions are no longer federally enforceable.

B. District Rule 2201 - New and Modified Stationary Source Review (NSR)

District Rule 2201 has been amended since this facility’s Title V permit was last renewed. However, the requirements of this rule are only triggered at the time the source undergoes a modification. All applicable requirements from any NSR permit actions have already been incorporated into the current Title V permit.

C. District Rule 2520 - Federally Mandated Operating Permits

This rule has been amended since this facility’s previous Title V permit was issued. The amendments enhanced the public notice process by making public notice information available on the District’s website 24 hours/day, 7 days/week, in both Spanish and English. This rule amendment did not require any changes to existing permit conditions. Thus, continued compliance is expected.

D. District Rule 4601 – Architectural Coatings

This rule limits the emissions of VOC's from architectural coatings. The VOC content limits for coatings and colorants are listed in Tables 1 and 2, respectively, of Section 5.0 of the amended rule. This rule also specifies architectural coatings storage, cleanup, and labeling requirements.

The rule was amended in April 16, 2020 but has not been SIP approved. The stringency analysis in Attachment D shows that the amended rule is as stringent as the SIP approved version of the rule that was adopted in December 17, 2009.

The following changes were included in the latest rule amendment that resulted in revising current permit requirements:

- Table of Standards 1 (through 12/31/2010) and Table of Standards 2 (after 1/1/2011) specifying the VOC content of different coatings and colorants have been replaced with Table 1 and Table 2 (effective after 1/1/2022) in Section 5.0.

To ensure compliance with Rule 4601 as amended 4/16/2020, conditions #23, #24, and #25 of the current facility-wide permit N-1980-0-3 will be replaced with conditions #23, #24, and #25 on the draft facility-wide permit N-96-0-4.

- No person shall manufacture, blend, repackage, supply, market, sell, solicit or apply any architectural coating or colorant with a VOC content in excess of the applicable limits specified in Table 1 (Coatings) and Table 2 (Colorants) of District Rule 4601 (4/16/20), unless exempted under section 4.0 of District Rule 4601 (Amended 4/16/20). [District Rule 4601]
- All VOC-containing materials subject to Rule 4601 (4/16/20) shall be stored in closed containers when not in use. [District Rule 4601, 5.4]
- The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.3 (4/16/20). [District Rule 4601, 6.1 and 6.3]

E. 40 CFR Part 64 - Compliance Assurance Monitoring (CAM)

40 CFR Part 64 requires Compliance Assurance Monitoring (CAM) for units that meet the following three criteria:

1. The unit must have an emission limit for the pollutant;
2. 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.

Flexographic printing and converting systems (Permit unit N-1980-2 through N-1980-6)

These permit units do not contain emission limits for any criteria pollutant, and these units are not equipped with any add-on control devices. Therefore, these units are not subject to CAM.

Waste paperboard pick-up systems (Permit unit N-1980-7)

This permit unit does contain emission limits for criteria pollutants, however this unit is not equipped with an add-on control device. Therefore, this unit is not subject to CAM.

Flexographic printing operation (Permit unit N-1980-10)

This permit unit does contain emission limits for criteria pollutants, however this unit is not equipped with an add-on control device. Therefore, this unit is not subject to CAM.

Therefore, there are no applicable CAM requirements for this facility's units and no further discussion is required.

F. 40 CFR 82, Subparts B - Servicing of Motor Vehicle Air Conditioners

The purpose of 40 CFR Part 82 Subpart B is to implement section 609 of the Clean Air Act, as amended regarding the servicing of motor vehicle air conditioners (MVACs), and to implement section 608 of the Clean Air Act regarding certain servicing, maintenance, repair and disposal of air conditioners in MVACs and MVAC-like appliances.

These regulations apply to any person performing service on a motor vehicle for consideration when this service involves the refrigerant in the motor vehicle air conditioner.

The amendments to this rule did not have any effect on the current permit requirements and condition #28 of permit unit N-1980-0-3 assures compliance with the requirements.

G. 40 CFR 82, Subpart F, Recycling and Emission Reduction

The purpose of 40 CFR 82 Subpart F is to reduce emissions of class I and class II refrigerants and their substitutes to the lowest achievable level by maximizing the recapture and recycling of such refrigerants during the service, maintenance, repair, and disposal of appliances and restricting the sale of refrigerants consisting in whole or in part of a class I and class II ODS in accordance with Title VI of the Clean Air Act.

These regulations apply to any person servicing, maintaining, or repairing appliances. This subpart also applies to persons disposing of appliances, including small appliances and motor vehicle air conditioners. In addition, this subpart applies to refrigerant reclaimers, technician certifying programs, appliance owners and operators, manufacturers of appliances, manufacturers of recycling and recovery equipment, approved recycling and recovery equipment testing organizations, persons selling class I or class II refrigerants or offering class I or class II refrigerants for sale, and persons purchasing class I or class II refrigerants.

The amendments to this rule did not have any effect on current permit requirements and condition #27 of permit unit N-1980-0-3 assures compliance with the requirements.

IX. 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

By using the model general permit template listed in Section IV of this Evaluation, the applicant has requested that a permit shield be issued for requirements addressed in the template. The basis for each permit shield is discussed in the Permit Shield section of each template.

B. Requirements not Addressed by Model General Permit Templates

The applicant is not proposing any new permit shields. Permit shields that refer to rules that have been amended have been removed as they no longer apply.

X. PERMIT CONDITIONS

See Attachment A - Draft Renewed Title V Operating Permit.

XI. ATTACHMENTS

- A. Draft Renewed Title V Operating Permit
- B. Previous Title V Operating Permit
- C. Detailed Facility List
- D. Rule 4601 Stringency Analysis

ATTACHMENT A

Draft Renewed Title V Operating Permit

San Joaquin Valley Air Pollution Control District

FACILITY: N-1980-0-4

EXPIRATION DATE: 09/30/2021

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]
2. 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]
3. {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
4. {4365} 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 (12/20/07). [District Rule 2010, 3.0 and 4.0; and 2020] Federally Enforceable Through Title V Permit
5. {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
6. {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
7. {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
8. {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
9. {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: EVERGREEN BEVERAGE PACKAGING
Location: 1500 W MAIN ST, TURLOCK, CA 95380-0000
N-1980-0-4 - Sep 6 2022 10:56AM - MIRANDAM

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

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

22. {4383} No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (02/17/05). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101, and County Rules 401 (in all eight counties in the San Joaquin Valley)] Federally Enforceable Through Title V Permit
23. No person shall manufacture, blend, repackage, supply, market, sell, solicit or apply any architectural coating or colorant with a VOC content in excess of the applicable limits specified in Table 1 (Coatings) and Table 2 (Colorants) of District Rule 4601 (4/16/20), unless exempted under section 4.0 of District Rule 4601 (Amended 4/16/20). [District Rule 4601] Federally Enforceable Through Title V Permit
24. All VOC-containing materials subject to Rule 4601 (4/16/20) shall be stored in closed containers when not in use. [District Rule 4601, 5.4] Federally Enforceable Through Title V Permit
25. The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.3 (4/16/20). [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

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

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
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. {4400} Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following outdated SIP requirements: Rule 401 (Madera, Fresno, Kern, Kings, San Joaquin, Stanislaus, Tulare and Merced), Rule 110 (Fresno, Stanislaus, San Joaquin), Rule 109 (Merced), Rule 113 (Madera), Rule 111 (Kern, Tulare, Kings), and Rule 202 (Fresno, Kern, Tulare, Kings, Madera, Stanislaus, Merced, San Joaquin). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
40. {4401} Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2040 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (2/17/05); 4601 (12/17/09); 8021 (8/19/2004); 8031 (8/19/2004); 8041 (8/19/2004); 8051 (8/19/2004); 8061 (8/19/2004); and 8071 (9/16/2004). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
41. {118} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
42. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report begin January 1 of every year, 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.

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1980-2-4

EXPIRATION DATE: 09/30/2021

EQUIPMENT DESCRIPTION:

FLEXOGRAPHIC PRINTING AND CONVERTING SYSTEM (LINE B) SERVED BY AN 875,000 BTU/HR NATURAL GAS-FIRED DRYER

PERMIT UNIT REQUIREMENTS

1. For flexographic printing operations, VOC content of graphic arts materials, less water and less exempt compounds, as applied, shall not exceed any of the following limits: flexographic ink on porous substrates: 225 g/l (1.88 lb/gal), all other inks: 300 g/l (2.5 lb/gal), coating: 300 g/l (2.5 lb/gal), adhesive: 150 g/l (1.25 lb/gal), web splicing adhesive: 150 g/l (1.25 lb/gal). [District Rules 2520, 9.3.2 and 4607, 5.1] Federally Enforceable Through Title V Permit
2. For flexographic printing operations, VOC content of specialty ink, less water and less exempt compounds, as applied, shall not exceed any of the following limits: metallic ink: 300 g/l (2.5 lb/gal), matte finish ink: 300 g/l (2.5 lb/gal), metallic ink and matte finish ink on flexible package printing: 300 g/l (2.5 lb/gal). In addition, the specialty inks used shall not exceed two gallons in a calendar day and 120 gallons in a calendar year. [District Rules 2520, 9.3.2 and 4607, 5.2] Federally Enforceable Through Title V Permit
3. 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, 5.7] Federally Enforceable Through Title V Permit
4. No owner or operator shall use organic solvents for cleaning operations that exceed the VOC content limit specified in Table 7 of District Rule 4607 (12/18/2008). [District Rule 4607, 5.8.1] Federally Enforceable Through Title V Permit
5. For a permittee using any solvent containing more than 25 g/L of VOC for organic solvent cleaning, cleaning activities shall be by one of the following methods: wipe cleaning; application of solvent using nonpropellant-induced, hand-held spray bottles; non-atomized solvent flow method, or solvent flushing method. [District Rule 4607, 5.8.3] Federally Enforceable Through Title V Permit
6. 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, 5.8.4] Federally Enforceable Through Title V Permit
7. 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 materials 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, 5.8.5] Federally Enforceable Through Title V Permit
8. 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, 5.9] 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.

9. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. The permittee shall properly use and properly operate all graphic arts printing technologies as directed and/or specified by the manufacturer of the printer or graphic arts material. [District Rule 4607, 5.10] Federally Enforceable Through Title V Permit
10. Permittee shall maintain a current file documenting coatings, inks, adhesives, fountain solutions, wash primers, and solvents in use and in storage. The file shall include material safety data sheet (MSDS) or product data sheet showing the material name, manufacturer's name, VOC content as applied, specific mixing instructions, and density. [District Rule 4607, 6.1.1] Federally Enforceable Through Title V Permit
11. Permittee shall record on a monthly basis, the type and amount of all inks, coating, adhesive, wash primer, solvent, and percent VOC by volume of fountain solution used at the facility. [District Rules 1070, 4.0 and 4607, 6.1.2] Federally Enforceable Through Title V Permit
12. Permittee shall record on a daily basis, the type and amount of each specialty ink used at the facility, as defined in Rule 4607. [District Rules 1070, 4.0 and 4607, 6.1.4] Federally Enforceable Through Title V Permit
13. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070, 4.0, 2520, 9.4.2 and 4607, 6.1] Federally Enforceable Through Title V Permit
14. The unit shall only be fired on PUC-regulated natural gas. [District Rule 4801] Federally Enforceable Through Title V Permit
15. Sulfur compound emissions shall not exceed 2000 ppmv as SO₂. [District Rule 4801] Federally Enforceable Through Title V Permit
16. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit

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

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1980-3-4

EXPIRATION DATE: 09/30/2021

EQUIPMENT DESCRIPTION:

FLEXOGRAPHIC PRINTING AND CONVERTING SYSTEM (LINE C) SERVED BY AN 875,000 BTU/HR NATURAL GAS-FIRED DRYER

PERMIT UNIT REQUIREMENTS

1. For flexographic printing operations, VOC content of graphic arts materials, less water and less exempt compounds, as applied, shall not exceed any of the following limits: flexographic ink on porous substrates: 225 g/l (1.88 lb/gal), all other inks: 300 g/l (2.5 lb/gal), coating: 300 g/l (2.5 lb/gal), adhesive: 150 g/l (1.25 lb/gal), web splicing adhesive: 150 g/l (1.25 lb/gal). [District Rules 2520, 9.3.2 and 4607, 5.1] Federally Enforceable Through Title V Permit
2. For flexographic printing operations, VOC content of specialty ink, less water and less exempt compounds, as applied, shall not exceed any of the following limits: metallic ink: 300 g/l (2.5 lb/gal), matte finish ink: 300 g/l (2.5 lb/gal), metallic ink and matte finish ink on flexible package printing: 300 g/l (2.5 lb/gal). In addition, the specialty inks used shall not exceed two gallons in a calendar day and 120 gallons in a calendar year. [District Rules 2520, 9.3.2 and 4607, 5.2] Federally Enforceable Through Title V Permit
3. 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, 5.7] Federally Enforceable Through Title V Permit
4. No owner or operator shall use organic solvents for cleaning operations that exceed the VOC content limit specified in Table 7 of District Rule 4607 (12/18/2008). [District Rule 4607, 5.8.1] Federally Enforceable Through Title V Permit
5. For a permittee using any solvent containing more than 25 g/L of VOC for organic solvent cleaning, cleaning activities shall be by one of the following methods: wipe cleaning; application of solvent using nonpropellant-induced, hand-held spray bottles; non-atomized solvent flow method, or solvent flushing method. [District Rule 4607, 5.8.3] Federally Enforceable Through Title V Permit
6. 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, 5.8.4] Federally Enforceable Through Title V Permit
7. 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 materials 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, 5.8.5] Federally Enforceable Through Title V Permit
8. 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, 5.9] 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.

9. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. The permittee shall properly use and properly operate all graphic arts printing technologies as directed and/or specified by the manufacturer of the printer or graphic arts material. [District Rule 4607, 5.10] Federally Enforceable Through Title V Permit
10. Permittee shall maintain a current file documenting coatings, inks, adhesives, fountain solutions, wash primers, and solvents in use and in storage. The file shall include material safety data sheet (MSDS) or product data sheet showing the material name, manufacturer's name, VOC content as applied, specific mixing instructions, and density. [District Rule 4607, 6.1.1] Federally Enforceable Through Title V Permit
11. Permittee shall record on a monthly basis, the type and amount of all inks, coating, adhesive, wash primer, solvent, and percent VOC by volume of fountain solution used at the facility. [District Rules 1070, 4.0 and 4607, 6.1.2] Federally Enforceable Through Title V Permit
12. Permittee shall record on a daily basis, the type and amount of each specialty ink used at the facility, as defined in Rule 4607. [District Rules 1070, 4.0 and 4607, 6.1.4] Federally Enforceable Through Title V Permit
13. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070, 4.0, 2520, 9.4.2 and 4607, 6.1] Federally Enforceable Through Title V Permit
14. The unit shall only be fired on PUC-regulated natural gas. [District Rule 4801] Federally Enforceable Through Title V Permit
15. Sulfur compound emissions shall not exceed 2000 ppmv as SO₂. [District Rule 4801] Federally Enforceable Through Title V Permit
16. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit

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

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1980-4-4

EXPIRATION DATE: 09/30/2021

EQUIPMENT DESCRIPTION:

FLEXOGRAPHIC PRINTING AND CONVERTING SYSTEM (LINE D) SERVED BY AN 875,000 BTU/HR NATURAL GAS-FIRED DRYER

PERMIT UNIT REQUIREMENTS

1. For flexographic printing operations, VOC content of graphic arts materials, less water and less exempt compounds, as applied, shall not exceed any of the following limits: flexographic ink on porous substrates: 225 g/l (1.88 lb/gal), all other inks: 300 g/l (2.5 lb/gal), coating: 300 g/l (2.5 lb/gal), adhesive: 150 g/l (1.25 lb/gal), web splicing adhesive: 150 g/l (1.25 lb/gal). [District Rules 2520, 9.3.2 and 4607, 5.1] Federally Enforceable Through Title V Permit
2. For flexographic printing operations, VOC content of specialty ink, less water and less exempt compounds, as applied, shall not exceed any of the following limits: metallic ink: 300 g/l (2.5 lb/gal), matte finish ink: 300 g/l (2.5 lb/gal), metallic ink and matte finish ink on flexible package printing: 300 g/l (2.5 lb/gal). In addition, the specialty inks used shall not exceed two gallons in a calendar day and 120 gallons in a calendar year. [District Rules 2520, 9.3.2 and 4607, 5.2] Federally Enforceable Through Title V Permit
3. 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, 5.7] Federally Enforceable Through Title V Permit
4. No owner or operator shall use organic solvents for cleaning operations that exceed the VOC content limit specified in Table 7 of District Rule 4607 (12/18/2008). [District Rule 4607, 5.8.1] Federally Enforceable Through Title V Permit
5. For a permittee using any solvent containing more than 25 g/L of VOC for organic solvent cleaning, cleaning activities shall be by one of the following methods: wipe cleaning; application of solvent using nonpropellant-induced, hand-held spray bottles; non-atomized solvent flow method, or solvent flushing method. [District Rule 4607, 5.8.3] Federally Enforceable Through Title V Permit
6. 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, 5.8.4] Federally Enforceable Through Title V Permit
7. 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 materials 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, 5.8.5] Federally Enforceable Through Title V Permit
8. 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, 5.9] 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.

9. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. The permittee shall properly use and properly operate all graphic arts printing technologies as directed and/or specified by the manufacturer of the printer or graphic arts material. [District Rule 4607, 5.10] Federally Enforceable Through Title V Permit
10. Permittee shall maintain a current file documenting coatings, inks, adhesives, fountain solutions, wash primers, and solvents in use and in storage. The file shall include material safety data sheet (MSDS) or product data sheet showing the material name, manufacturer's name, VOC content as applied, specific mixing instructions, and density. [District Rule 4607, 6.1.1] Federally Enforceable Through Title V Permit
11. Permittee shall record on a monthly basis, the type and amount of all inks, coating, adhesive, wash primer, solvent, and percent VOC by volume of fountain solution used at the facility. [District Rules 1070, 4.0 and 4607, 6.1.2] Federally Enforceable Through Title V Permit
12. Permittee shall record on a daily basis, the type and amount of each specialty ink used at the facility, as defined in Rule 4607. [District Rules 1070, 4.0 and 4607, 6.1.4] Federally Enforceable Through Title V Permit
13. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070, 4.0, 2520, 9.4.2 and 4607, 6.1] Federally Enforceable Through Title V Permit
14. The unit shall only be fired on PUC-regulated natural gas. [District Rule 4801] Federally Enforceable Through Title V Permit
15. Sulfur compound emissions shall not exceed 2000 ppmv as SO₂. [District Rule 4801] Federally Enforceable Through Title V Permit
16. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit

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

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1980-5-4

EXPIRATION DATE: 09/30/2021

EQUIPMENT DESCRIPTION:

FLEXOGRAPHIC PRINTING AND CONVERTING SYSTEM (LINE E) SERVED BY AN 875,000 BTU/HR NATURAL GAS-FIRED DRYER

PERMIT UNIT REQUIREMENTS

1. For flexographic printing operations, VOC content of graphic arts materials, less water and less exempt compounds, as applied, shall not exceed any of the following limits: flexographic ink on porous substrates: 225 g/l (1.88 lb/gal), all other inks: 300 g/l (2.5 lb/gal), coating: 300 g/l (2.5 lb/gal), adhesive: 150 g/l (1.25 lb/gal), web splicing adhesive: 150 g/l (1.25 lb/gal). [District Rules 2520, 9.3.2 and 4607, 5.1] Federally Enforceable Through Title V Permit
2. For flexographic printing operations, VOC content of specialty ink, less water and less exempt compounds, as applied, shall not exceed any of the following limits: metallic ink: 300 g/l (2.5 lb/gal), matte finish ink: 300 g/l (2.5 lb/gal), metallic ink and matte finish ink on flexible package printing: 300 g/l (2.5 lb/gal). In addition, the specialty inks used shall not exceed two gallons in a calendar day and 120 gallons in a calendar year. [District Rules 2520, 9.3.2 and 4607, 5.2] Federally Enforceable Through Title V Permit
3. 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, 5.7] Federally Enforceable Through Title V Permit
4. No owner or operator shall use organic solvents for cleaning operations that exceed the VOC content limit specified in Table 7 of District Rule 4607 (12/18/2008). [District Rule 4607, 5.8.1] Federally Enforceable Through Title V Permit
5. For a permittee using any solvent containing more than 25 g/L of VOC for organic solvent cleaning, cleaning activities shall be by one of the following methods: wipe cleaning; application of solvent using nonpropellant-induced, hand-held spray bottles; non-atomized solvent flow method, or solvent flushing method. [District Rule 4607, 5.8.3] Federally Enforceable Through Title V Permit
6. 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, 5.8.4] Federally Enforceable Through Title V Permit
7. 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 materials 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, 5.8.5] Federally Enforceable Through Title V Permit
8. 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, 5.9] 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.

9. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. The permittee shall properly use and properly operate all graphic arts printing technologies as directed and/or specified by the manufacturer of the printer or graphic arts material. [District Rule 4607, 5.10] Federally Enforceable Through Title V Permit
10. Permittee shall maintain a current file documenting coatings, inks, adhesives, fountain solutions, wash primers, and solvents in use and in storage. The file shall include material safety data sheet (MSDS) or product data sheet showing the material name, manufacturer's name, VOC content as applied, specific mixing instructions, and density. [District Rule 4607, 6.1.1] Federally Enforceable Through Title V Permit
11. Permittee shall record on a monthly basis, the type and amount of all inks, coating, adhesive, wash primer, solvent, and percent VOC by volume of fountain solution used at the facility. [District Rules 1070, 4.0 and 4607, 6.1.2] Federally Enforceable Through Title V Permit
12. Permittee shall record on a daily basis, the type and amount of each specialty ink used at the facility, as defined in Rule 4607. [District Rules 1070, 4.0 and 4607, 6.1.4] Federally Enforceable Through Title V Permit
13. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070, 4.0, 2520, 9.4.2 and 4607, 6.1] Federally Enforceable Through Title V Permit
14. The unit shall only be fired on PUC-regulated natural gas. [District Rule 4801] Federally Enforceable Through Title V Permit
15. Sulfur compound emissions shall not exceed 2000 ppmv as SO₂. [District Rule 4801] Federally Enforceable Through Title V Permit
16. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit

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

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1980-6-4

EXPIRATION DATE: 09/30/2021

EQUIPMENT DESCRIPTION:

FLEXOGRAPHIC PRINTING AND CONVERTING SYSTEM (LINE F) SERVED BY AN 875,000 BTU/HR NATURAL GAS-FIRED DRYER

PERMIT UNIT REQUIREMENTS

1. For flexographic printing operations, VOC content of graphic arts materials, less water and less exempt compounds, as applied, shall not exceed any of the following limits: flexographic ink on porous substrates: 225 g/l (1.88 lb/gal), all other inks: 300 g/l (2.5 lb/gal), coating: 300 g/l (2.5 lb/gal), adhesive: 150 g/l (1.25 lb/gal), web splicing adhesive: 150 g/l (1.25 lb/gal). [District Rules 2520, 9.3.2 and 4607, 5.1] Federally Enforceable Through Title V Permit
2. For flexographic printing operations, VOC content of specialty ink, less water and less exempt compounds, as applied, shall not exceed any of the following limits: metallic ink: 300 g/l (2.5 lb/gal), matte finish ink: 300 g/l (2.5 lb/gal), metallic ink and matte finish ink on flexible package printing: 300 g/l (2.5 lb/gal). In addition, the specialty inks used shall not exceed two gallons in a calendar day and 120 gallons in a calendar year. [District Rules 2520, 9.3.2 and 4607, 5.2] Federally Enforceable Through Title V Permit
3. 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, 5.7] Federally Enforceable Through Title V Permit
4. No owner or operator shall use organic solvents for cleaning operations that exceed the VOC content limit specified in Table 7 of District Rule 4607 (12/18/2008). [District Rule 4607, 5.8.1] Federally Enforceable Through Title V Permit
5. For a permittee using any solvent containing more than 25 g/L of VOC for organic solvent cleaning, cleaning activities shall be by one of the following methods: wipe cleaning; application of solvent using nonpropellant-induced, hand-held spray bottles; non-atomized solvent flow method, or solvent flushing method. [District Rule 4607, 5.8.3] Federally Enforceable Through Title V Permit
6. 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, 5.8.4] Federally Enforceable Through Title V Permit
7. 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 materials 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, 5.8.5] Federally Enforceable Through Title V Permit
8. 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, 5.9] 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.

9. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. The permittee shall properly use and properly operate all graphic arts printing technologies as directed and/or specified by the manufacturer of the printer or graphic arts material. [District Rule 4607, 5.10] Federally Enforceable Through Title V Permit
10. Permittee shall maintain a current file documenting coatings, inks, adhesives, fountain solutions, wash primers, and solvents in use and in storage. The file shall include material safety data sheet (MSDS) or product data sheet showing the material name, manufacturer's name, VOC content as applied, specific mixing instructions, and density. [District Rule 4607, 6.1.1] Federally Enforceable Through Title V Permit
11. Permittee shall record on a monthly basis, the type and amount of all inks, coating, adhesive, wash primer, solvent, and percent VOC by volume of fountain solution used at the facility. [District Rules 1070, 4.0 and 4607, 6.1.2] Federally Enforceable Through Title V Permit
12. Permittee shall record on a daily basis, the type and amount of each specialty ink used at the facility, as defined in Rule 4607. [District Rules 1070, 4.0 and 4607, 6.1.4] Federally Enforceable Through Title V Permit
13. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070, 4.0, 2520, 9.4.2 and 4607, 6.1] Federally Enforceable Through Title V Permit
14. The unit shall only be fired on PUC-regulated natural gas. [District Rule 4801] Federally Enforceable Through Title V Permit
15. Sulfur compound emissions shall not exceed 2000 ppmv as SO₂. [District Rule 4801] Federally Enforceable Through Title V Permit
16. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit

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

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***San Joaquin Valley
Air Pollution Control District***

PERMIT UNIT: N-1980-7-6

EXPIRATION DATE: 09/30/2021

EQUIPMENT DESCRIPTION:

WASTE PAPERBOARD PICK-UP SYSTEM, BLOWER AND CHOPPER AND A SHREDDER/HOGGER SERVED BY TWO CYCLONES

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. {12} Material removed from dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201]
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] Federally Enforceable Through Title V Permit
4. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
5. 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
6. The amount of material collected by the waste paperboard pick-up system and cyclones shall not exceed 20 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
7. PM10 emissions from the waste paperboard pick-up system and cyclones shall not exceed 0.0000082 lb per lb of waste paperboard. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Permittee shall record on a daily basis the amount of waste paperboard collected in tons. [District Rule 2201] Federally Enforceable Through Title V Permit
9. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1980-10-3

EXPIRATION DATE: 09/30/2021

EQUIPMENT DESCRIPTION:

FLEXOGRAPHIC PRINTING OPERATION CONSISTING OF A WEB-FED 4-COLOR EVERS FLEXOGRAPHIC PRINTING PRESS, A 0.6 MMBTU/HR NATURAL GAS-FIRED DRYING OVEN, AN ADHESIVE APPLICATION OPERATION, AND A SCORING/CUTTING/TRIMMING SYSTEM SERVED BY A PAPER WASTEBOARD PICK-UP SYSTEM LISTED IN PERMIT N-1980-7

PERMIT UNIT REQUIREMENTS

1. {98} 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] 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. The drying oven shall only be fired on PUC-regulated natural gas. [District Rules 2201 and 4801] Federally Enforceable Through Title V Permit
5. Drying oven emission factors shall not exceed any of the following limits: 0.1 lb-NO_x/MMBtu, 0.00285 lb-SO_x/MMBtu, 0.0076 lb-PM₁₀/MMBtu, 0.084 lb-CO/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
6. VOC content of the following materials shall not exceed any of the following limits: adhesive materials: 2.40 lb/gal excluding water and exempt compounds; ink with ink additives (if any): 2.40 lb/gal excluding water and exempt compounds; cleaning solvent materials for specialty flexographic printing ink application equipment: 0.83 lb/gal. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Ammonia Hydroxide (NH₄OH) content of the following materials shall not exceed any of the following limits: adhesive materials: 4.0 lb/100 lb adhesive; ink additive: 13.0 lb/100 lb ink additive. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Total emissions from all adhesives, inks, ink additives and solvents shall not exceed either of the following limits: 91.5 lb-VOC/day and 2.8 lb-NH₃/day. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Total VOC emissions from all adhesives, inks, ink additives and solvents shall not exceed 23,791 pounds in any rolling 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Total ammonia (NH₃) emissions from all adhesives, inks, ink additives and solvents shall not exceed 988 pounds per year. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Ammonia (NH₃) emissions from each product shall be determined using the following equation: Ammonia Hydroxide (NH₄OH) content (lb-NH₄OH/lb-product) x usage (gal/day or gal/year) x 17.03 ÷ 35.05 x density (lb/gal). [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.

12. For flexographic printing operations, VOC content of graphic arts materials, less water and less exempt compounds, as applied, shall not exceed any of the following limits: flexographic ink on porous substrates: 225 g/l (1.88 lb/gal); all other inks: 300 g/l (2.5 lb/gal); coating: 300 g/l (2.5 lb/gal); adhesive: 150 g/l (1.25 lb/gal); web splicing adhesive: 150 g/l (1.25 lb/gal). [District Rules 2520 and 4607] Federally Enforceable Through Title V Permit
13. For flexographic printing operations, VOC content of specialty ink, less water and less exempt compounds, as applied, shall not exceed any of the following limits: metallic ink: 300 g/l (2.5 lb/gal); matte finish ink: 300 g/l (2.5 lb/gal); metallic ink and matte finish ink on flexible package printing: 300 g/l (2.5 lb/gal). In addition, the specialty inks used shall not exceed two gallons in a calendar day and 120 gallons in a calendar year. [District Rules 2520 and 4607] Federally Enforceable Through Title V Permit
14. 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
15. Cleaning activities that use solvents with a VOC content greater than 25 g/l (0.21 lb/gallon) shall be performed by one or more of the following methods: (1) wipe cleaning; or (2) application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force; or (3) non-atomized solvent flow method in which the cleaning solvent is collected in a container or a collection system which is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container; or (4) solvent flushing method in which the cleaning solvent is discharged into a container that is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container. The discharged solvent from the equipment must be collected into containers without atomizing into the open air. The solvent may be flushed through the system by air or hydraulic pressure, or by pumping. [District Rule 4607] Federally Enforceable Through Title V Permit
16. For a permittee using any solvent containing more than 25 g/L of VOC for organic solvent cleaning, 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
17. For a permittee using any solvent containing more than 25 g/L of VOC for organic solvent cleaning, the permittee shall not use VOC-containing materials 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
18. 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
19. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. The permittee shall properly use and properly operate all graphic arts printing technologies as directed and/or specified by the manufacturer of the printer or graphic arts material. [District Rule 4607] Federally Enforceable Through Title V Permit
20. Permittee shall maintain a current file of inks, adhesives, and solvents in use and in storage. The file shall include material safety data sheet (MSDS) or product data sheet showing the material name, manufacturer's name, VOC content, less water and exempt compounds and Ammonia Hydroxide (NH₄OH) content (or sufficient composition data to calculate these values), material VOC content (or VOC content "as packaged" from manufacturer), mixing instructions, and density. [District Rules 2201 and 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.

21. For each ink, adhesive and solvent material used in this operation, the permittee shall record on a daily basis the product/material name, material type (e.g. ink), amount used (gallons), VOC content, less water and exempt compounds (lb-VOC/gal), material VOC content (lb-VOC/gal), the VOC emissions in pounds (material VOC content in lb-VOC/gal multiplied by the usage in gallons), Ammonia Hydroxide (NH₄OH) content (lb-NH₄OH/lb-product), and the ammonia (NH₃) emissions in pounds. [District Rules 2201 and 4607] Federally Enforceable Through Title V Permit
22. Permittee shall record on a daily basis, the type and amount of each specialty ink used at the facility, as defined in Rule 4607. [District Rules 1070 and 4607] Federally Enforceable Through Title V Permit
23. On a monthly basis, the permittee shall calculate and record the monthly VOC emissions from this unit. [District Rule 2201] Federally Enforceable Through Title V Permit
24. The permittee shall calculate and record the annual ammonia (NH₃) emissions from this unit. [District Rule 2201] Federally Enforceable Through Title V Permit
25. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070, 2520, and 4607] Federally Enforceable Through Title V Permit

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

DRAFT

ATTACHMENT B

Previous Title V Operating Permit

San Joaquin Valley

Air Pollution Control District

FACILITY: N-1980-0-3

EXPIRATION DATE: 09/30/2021

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; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
2. 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; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
3. 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
4. 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 (12/20/07). [District Rule 2010, 3.0 and 4.0; and 2020] Federally Enforceable Through Title V Permit
5. 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
6. 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
7. 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
8. 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
9. 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: EVERGREEN BEVERAGE PACKAGING
Location: 1500 W MAIN ST, TURLOCK, CA 95380-0000
N-1980-0-3 : Sep 1 2022 2:11PM - MIRANDAM

10. 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. 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. 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. 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. 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. 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. 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. 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. 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. 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. 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. 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 County Rules 401 (in all eight counties in the San Joaquin Valley)] 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.

23. 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. 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. 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. 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. 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. 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. 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. 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. 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. 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. 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. 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. 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.

36. 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. 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. 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. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following outdated SIP requirements: Rule 401 (Madera, Fresno, Kern, Kings, San Joaquin, Stanislaus, Tulare and Merced), Rule 110 (Fresno, Stanislaus, San Joaquin), Rule 109 (Merced), Rule 113 (Madera), Rule 111 (Kern, Tulare, Kings), and Rule 202 (Fresno, Kern, Tulare, Kings, Madera, Stanislaus, Merced, San Joaquin). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
40. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2040 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (2/17/05); 4601 (12/17/09); 8021 (8/19/2004); 8031 (8/19/2004); 8041 (8/19/2004); 8051 (8/19/2004); 8061 (8/19/2004); and 8071 (9/16/2004). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
41. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
42. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report begin January 1 of every year, 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.

San Joaquin Valley

Air Pollution Control District

PERMIT UNIT: N-1980-2-3

EXPIRATION DATE: 09/30/2021

EQUIPMENT DESCRIPTION:

FLEXOGRAPHIC PRINTING AND CONVERTING SYSTEM (LINE B) SERVED BY AN 875,000 BTU/HR NATURAL GAS-FIRED DRYER

PERMIT UNIT REQUIREMENTS

1. For flexographic printing operations, VOC content of graphic arts materials, less water and less exempt compounds, as applied, shall not exceed any of the following limits: flexographic ink on porous substrates: 225 g/l (1.88 lb/gal), all other inks: 300 g/l (2.5 lb/gal), coating: 300 g/l (2.5 lb/gal), adhesive: 150 g/l (1.25 lb/gal), web splicing adhesive: 150 g/l (1.25 lb/gal). [District Rules 2520, 9.3.2 and 4607, 5.1] Federally Enforceable Through Title V Permit
2. For flexographic printing operations, VOC content of specialty ink, less water and less exempt compounds, as applied, shall not exceed any of the following limits: metallic ink: 300 g/l (2.5 lb/gal), matte finish ink: 300 g/l (2.5 lb/gal), metallic ink and matte finish ink on flexible package printing: 300 g/l (2.5 lb/gal). In addition, the specialty inks used shall not exceed two gallons in a calendar day and 120 gallons in a calendar year. [District Rules 2520, 9.3.2 and 4607, 5.2] Federally Enforceable Through Title V Permit
3. 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, 5.7] Federally Enforceable Through Title V Permit
4. No owner or operator shall use organic solvents for cleaning operations that exceed the VOC content limit specified in Table 7 of District Rule 4607 (12/18/2008). [District Rule 4607, 5.8.1] Federally Enforceable Through Title V Permit
5. For a permittee using any solvent containing more than 25 g/L of VOC for organic solvent cleaning, cleaning activities shall be by one of the following methods: wipe cleaning; application of solvent using nonpropellant-induced, hand-held spray bottles; non-atomized solvent flow method, or solvent flushing method. [District Rule 4607, 5.8.3] Federally Enforceable Through Title V Permit
6. 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, 5.8.4] Federally Enforceable Through Title V Permit
7. 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 materials 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, 5.8.5] Federally Enforceable Through Title V Permit
8. 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, 5.9] 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.

9. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. The permittee shall properly use and properly operate all graphic arts printing technologies as directed and/or specified by the manufacturer of the printer or graphic arts material. [District Rule 4607, 5.10] Federally Enforceable Through Title V Permit
10. Permittee shall maintain a current file documenting coatings, inks, adhesives, fountain solutions, wash primers, and solvents in use and in storage. The file shall include material safety data sheet (MSDS) or product data sheet showing the material name, manufacturer's name, VOC content as applied, specific mixing instructions, and density. [District Rule 4607, 6.1.1] Federally Enforceable Through Title V Permit
11. Permittee shall record on a monthly basis, the type and amount of all inks, coating, adhesive, wash primer, solvent, and percent VOC by volume of fountain solution used at the facility. [District Rules 1070, 4.0 and 4607, 6.1.2] Federally Enforceable Through Title V Permit
12. Permittee shall record on a daily basis, the type and amount of each specialty ink used at the facility, as defined in Rule 4607. [District Rules 1070, 4.0 and 4607, 6.1.4] Federally Enforceable Through Title V Permit
13. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070, 4.0, 2520, 9.4.2 and 4607, 6.1] Federally Enforceable Through Title V Permit
14. The unit shall only be fired on PUC-regulated natural gas. [District Rule 4801] Federally Enforceable Through Title V Permit
15. Sulfur compound emissions shall not exceed 2000 ppmv as SO₂. [District Rule 4801] Federally Enforceable Through Title V Permit
16. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit

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

San Joaquin Valley *Air Pollution Control District*

PERMIT UNIT: N-1980-3-3

EXPIRATION DATE: 09/30/2021

EQUIPMENT DESCRIPTION:

FLEXOGRAPHIC PRINTING AND CONVERTING SYSTEM (LINE C) SERVED BY AN 875,000 BTU/HR NATURAL GAS-FIRED DRYER

PERMIT UNIT REQUIREMENTS

1. For flexographic printing operations, VOC content of graphic arts materials, less water and less exempt compounds, as applied, shall not exceed any of the following limits: flexographic ink on porous substrates: 225 g/l (1.88 lb/gal), all other inks: 300 g/l (2.5 lb/gal), coating: 300 g/l (2.5 lb/gal), adhesive: 150 g/l (1.25 lb/gal), web splicing adhesive: 150 g/l (1.25 lb/gal). [District Rules 2520, 9.3.2 and 4607, 5.1] Federally Enforceable Through Title V Permit
2. For flexographic printing operations, VOC content of specialty ink, less water and less exempt compounds, as applied, shall not exceed any of the following limits: metallic ink: 300 g/l (2.5 lb/gal), matte finish ink: 300 g/l (2.5 lb/gal), metallic ink and matte finish ink on flexible package printing: 300 g/l (2.5 lb/gal). In addition, the specialty inks used shall not exceed two gallons in a calendar day and 120 gallons in a calendar year. [District Rules 2520, 9.3.2 and 4607, 5.2] Federally Enforceable Through Title V Permit
3. 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, 5.7] Federally Enforceable Through Title V Permit
4. No owner or operator shall use organic solvents for cleaning operations that exceed the VOC content limit specified in Table 7 of District Rule 4607 (12/18/2008). [District Rule 4607, 5.8.1] Federally Enforceable Through Title V Permit
5. For a permittee using any solvent containing more than 25 g/L of VOC for organic solvent cleaning, cleaning activities shall be by one of the following methods: wipe cleaning; application of solvent using nonpropellant-induced, hand-held spray bottles; non-atomized solvent flow method, or solvent flushing method. [District Rule 4607, 5.8.3] Federally Enforceable Through Title V Permit
6. 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, 5.8.4] Federally Enforceable Through Title V Permit
7. 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 materials 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, 5.8.5] Federally Enforceable Through Title V Permit
8. 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, 5.9] 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.

9. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. The permittee shall properly use and properly operate all graphic arts printing technologies as directed and/or specified by the manufacturer of the printer or graphic arts material. [District Rule 4607, 5.10] Federally Enforceable Through Title V Permit
10. Permittee shall maintain a current file documenting coatings, inks, adhesives, fountain solutions, wash primers, and solvents in use and in storage. The file shall include material safety data sheet (MSDS) or product data sheet showing the material name, manufacturer's name, VOC content as applied, specific mixing instructions, and density. [District Rule 4607, 6.1.1] Federally Enforceable Through Title V Permit
11. Permittee shall record on a monthly basis, the type and amount of all inks, coating, adhesive, wash primer, solvent, and percent VOC by volume of fountain solution used at the facility. [District Rules 1070, 4.0 and 4607, 6.1.2] Federally Enforceable Through Title V Permit
12. Permittee shall record on a daily basis, the type and amount of each specialty ink used at the facility, as defined in Rule 4607. [District Rules 1070, 4.0 and 4607, 6.1.4] Federally Enforceable Through Title V Permit
13. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070, 4.0, 2520, 9.4.2 and 4607, 6.1] Federally Enforceable Through Title V Permit
14. The unit shall only be fired on PUC-regulated natural gas. [District Rule 4801] Federally Enforceable Through Title V Permit
15. Sulfur compound emissions shall not exceed 2000 ppmv as SO₂. [District Rule 4801] Federally Enforceable Through Title V Permit
16. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit

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

San Joaquin Valley

Air Pollution Control District

PERMIT UNIT: N-1980-4-3

EXPIRATION DATE: 09/30/2021

EQUIPMENT DESCRIPTION:

FLEXOGRAPHIC PRINTING AND CONVERTING SYSTEM (LINE D) SERVED BY AN 875,000 BTU/HR NATURAL GAS-FIRED DRYER

PERMIT UNIT REQUIREMENTS

1. For flexographic printing operations, VOC content of graphic arts materials, less water and less exempt compounds, as applied, shall not exceed any of the following limits: flexographic ink on porous substrates: 225 g/l (1.88 lb/gal), all other inks: 300 g/l (2.5 lb/gal), coating: 300 g/l (2.5 lb/gal), adhesive: 150 g/l (1.25 lb/gal), web splicing adhesive: 150 g/l (1.25 lb/gal). [District Rules 2520, 9.3.2 and 4607, 5.1] Federally Enforceable Through Title V Permit
2. For flexographic printing operations, VOC content of specialty ink, less water and less exempt compounds, as applied, shall not exceed any of the following limits: metallic ink: 300 g/l (2.5 lb/gal), matte finish ink: 300 g/l (2.5 lb/gal), metallic ink and matte finish ink on flexible package printing: 300 g/l (2.5 lb/gal). In addition, the specialty inks used shall not exceed two gallons in a calendar day and 120 gallons in a calendar year. [District Rules 2520, 9.3.2 and 4607, 5.2] Federally Enforceable Through Title V Permit
3. 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, 5.7] Federally Enforceable Through Title V Permit
4. No owner or operator shall use organic solvents for cleaning operations that exceed the VOC content limit specified in Table 7 of District Rule 4607 (12/18/2008). [District Rule 4607, 5.8.1] Federally Enforceable Through Title V Permit
5. For a permittee using any solvent containing more than 25 g/L of VOC for organic solvent cleaning, cleaning activities shall be by one of the following methods: wipe cleaning; application of solvent using nonpropellant-induced, hand-held spray bottles; non-atomized solvent flow method, or solvent flushing method. [District Rule 4607, 5.8.3] Federally Enforceable Through Title V Permit
6. 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, 5.8.4] Federally Enforceable Through Title V Permit
7. 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 materials 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, 5.8.5] Federally Enforceable Through Title V Permit
8. 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, 5.9] 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.

9. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. The permittee shall properly use and properly operate all graphic arts printing technologies as directed and/or specified by the manufacturer of the printer or graphic arts material. [District Rule 4607, 5.10] Federally Enforceable Through Title V Permit
10. Permittee shall maintain a current file documenting coatings, inks, adhesives, fountain solutions, wash primers, and solvents in use and in storage. The file shall include material safety data sheet (MSDS) or product data sheet showing the material name, manufacturer's name, VOC content as applied, specific mixing instructions, and density. [District Rule 4607, 6.1.1] Federally Enforceable Through Title V Permit
11. Permittee shall record on a monthly basis, the type and amount of all inks, coating, adhesive, wash primer, solvent, and percent VOC by volume of fountain solution used at the facility. [District Rules 1070, 4.0 and 4607, 6.1.2] Federally Enforceable Through Title V Permit
12. Permittee shall record on a daily basis, the type and amount of each specialty ink used at the facility, as defined in Rule 4607. [District Rules 1070, 4.0 and 4607, 6.1.4] Federally Enforceable Through Title V Permit
13. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070, 4.0, 2520, 9.4.2 and 4607, 6.1] Federally Enforceable Through Title V Permit
14. The unit shall only be fired on PUC-regulated natural gas. [District Rule 4801] Federally Enforceable Through Title V Permit
15. Sulfur compound emissions shall not exceed 2000 ppmv as SO₂. [District Rule 4801] Federally Enforceable Through Title V Permit
16. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit

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

San Joaquin Valley *Air Pollution Control District*

PERMIT UNIT: N-1980-5-3

EXPIRATION DATE: 09/30/2021

EQUIPMENT DESCRIPTION:

FLEXOGRAPHIC PRINTING AND CONVERTING SYSTEM (LINE E) SERVED BY AN 875,000 BTU/HR NATURAL GAS-FIRED DRYER

PERMIT UNIT REQUIREMENTS

1. For flexographic printing operations, VOC content of graphic arts materials, less water and less exempt compounds, as applied, shall not exceed any of the following limits: flexographic ink on porous substrates: 225 g/l (1.88 lb/gal), all other inks: 300 g/l (2.5 lb/gal), coating: 300 g/l (2.5 lb/gal), adhesive: 150 g/l (1.25 lb/gal), web splicing adhesive: 150 g/l (1.25 lb/gal). [District Rules 2520, 9.3.2 and 4607, 5.1] Federally Enforceable Through Title V Permit
2. For flexographic printing operations, VOC content of specialty ink, less water and less exempt compounds, as applied, shall not exceed any of the following limits: metallic ink: 300 g/l (2.5 lb/gal), matte finish ink: 300 g/l (2.5 lb/gal), metallic ink and matte finish ink on flexible package printing: 300 g/l (2.5 lb/gal). In addition, the specialty inks used shall not exceed two gallons in a calendar day and 120 gallons in a calendar year. [District Rules 2520, 9.3.2 and 4607, 5.2] Federally Enforceable Through Title V Permit
3. 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, 5.7] Federally Enforceable Through Title V Permit
4. No owner or operator shall use organic solvents for cleaning operations that exceed the VOC content limit specified in Table 7 of District Rule 4607 (12/18/2008). [District Rule 4607, 5.8.1] Federally Enforceable Through Title V Permit
5. For a permittee using any solvent containing more than 25 g/L of VOC for organic solvent cleaning, cleaning activities shall be by one of the following methods: wipe cleaning; application of solvent using nonpropellant-induced, hand-held spray bottles; non-atomized solvent flow method, or solvent flushing method. [District Rule 4607, 5.8.3] Federally Enforceable Through Title V Permit
6. 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, 5.8.4] Federally Enforceable Through Title V Permit
7. 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 materials 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, 5.8.5] Federally Enforceable Through Title V Permit
8. 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, 5.9] 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.

9. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. The permittee shall properly use and properly operate all graphic arts printing technologies as directed and/or specified by the manufacturer of the printer or graphic arts material. [District Rule 4607, 5.10] Federally Enforceable Through Title V Permit
10. Permittee shall maintain a current file documenting coatings, inks, adhesives, fountain solutions, wash primers, and solvents in use and in storage. The file shall include material safety data sheet (MSDS) or product data sheet showing the material name, manufacturer's name, VOC content as applied, specific mixing instructions, and density. [District Rule 4607, 6.1.1] Federally Enforceable Through Title V Permit
11. Permittee shall record on a monthly basis, the type and amount of all inks, coating, adhesive, wash primer, solvent, and percent VOC by volume of fountain solution used at the facility. [District Rules 1070, 4.0 and 4607, 6.1.2] Federally Enforceable Through Title V Permit
12. Permittee shall record on a daily basis, the type and amount of each specialty ink used at the facility, as defined in Rule 4607. [District Rules 1070, 4.0 and 4607, 6.1.4] Federally Enforceable Through Title V Permit
13. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070, 4.0, 2520, 9.4.2 and 4607, 6.1] Federally Enforceable Through Title V Permit
14. The unit shall only be fired on PUC-regulated natural gas. [District Rule 4801] Federally Enforceable Through Title V Permit
15. Sulfur compound emissions shall not exceed 2000 ppmv as SO₂. [District Rule 4801] Federally Enforceable Through Title V Permit
16. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit

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

San Joaquin Valley

Air Pollution Control District

PERMIT UNIT: N-1980-6-3

EXPIRATION DATE: 09/30/2021

EQUIPMENT DESCRIPTION:

FLEXOGRAPHIC PRINTING AND CONVERTING SYSTEM (LINE F) SERVED BY AN 875,000 BTU/HR NATURAL GAS-FIRED DRYER

PERMIT UNIT REQUIREMENTS

1. For flexographic printing operations, VOC content of graphic arts materials, less water and less exempt compounds, as applied, shall not exceed any of the following limits: flexographic ink on porous substrates: 225 g/l (1.88 lb/gal), all other inks: 300 g/l (2.5 lb/gal), coating: 300 g/l (2.5 lb/gal), adhesive: 150 g/l (1.25 lb/gal), web splicing adhesive: 150 g/l (1.25 lb/gal). [District Rules 2520, 9.3.2 and 4607, 5.1] Federally Enforceable Through Title V Permit
2. For flexographic printing operations, VOC content of specialty ink, less water and less exempt compounds, as applied, shall not exceed any of the following limits: metallic ink: 300 g/l (2.5 lb/gal), matte finish ink: 300 g/l (2.5 lb/gal), metallic ink and matte finish ink on flexible package printing: 300 g/l (2.5 lb/gal). In addition, the specialty inks used shall not exceed two gallons in a calendar day and 120 gallons in a calendar year. [District Rules 2520, 9.3.2 and 4607, 5.2] Federally Enforceable Through Title V Permit
3. 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, 5.7] Federally Enforceable Through Title V Permit
4. No owner or operator shall use organic solvents for cleaning operations that exceed the VOC content limit specified in Table 7 of District Rule 4607 (12/18/2008). [District Rule 4607, 5.8.1] Federally Enforceable Through Title V Permit
5. For a permittee using any solvent containing more than 25 g/L of VOC for organic solvent cleaning, cleaning activities shall be by one of the following methods: wipe cleaning; application of solvent using nonpropellant-induced, hand-held spray bottles; non-atomized solvent flow method, or solvent flushing method. [District Rule 4607, 5.8.3] Federally Enforceable Through Title V Permit
6. 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, 5.8.4] Federally Enforceable Through Title V Permit
7. 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 materials 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, 5.8.5] Federally Enforceable Through Title V Permit
8. 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, 5.9] 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.

9. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. The permittee shall properly use and properly operate all graphic arts printing technologies as directed and/or specified by the manufacturer of the printer or graphic arts material. [District Rule 4607, 5.10] Federally Enforceable Through Title V Permit
10. Permittee shall maintain a current file documenting coatings, inks, adhesives, fountain solutions, wash primers, and solvents in use and in storage. The file shall include material safety data sheet (MSDS) or product data sheet showing the material name, manufacturer's name, VOC content as applied, specific mixing instructions, and density. [District Rule 4607, 6.1.1] Federally Enforceable Through Title V Permit
11. Permittee shall record on a monthly basis, the type and amount of all inks, coating, adhesive, wash primer, solvent, and percent VOC by volume of fountain solution used at the facility. [District Rules 1070, 4.0 and 4607, 6.1.2] Federally Enforceable Through Title V Permit
12. Permittee shall record on a daily basis, the type and amount of each specialty ink used at the facility, as defined in Rule 4607. [District Rules 1070, 4.0 and 4607, 6.1.4] Federally Enforceable Through Title V Permit
13. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070, 4.0, 2520, 9.4.2 and 4607, 6.1] Federally Enforceable Through Title V Permit
14. The unit shall only be fired on PUC-regulated natural gas. [District Rule 4801] Federally Enforceable Through Title V Permit
15. Sulfur compound emissions shall not exceed 2000 ppmv as SO₂. [District Rule 4801] Federally Enforceable Through Title V Permit
16. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit

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

San Joaquin Valley

Air Pollution Control District

PERMIT UNIT: N-1980-7-5

EXPIRATION DATE: 09/30/2021

EQUIPMENT DESCRIPTION:

WASTE PAPERBOARD PICK-UP SYSTEM, BLOWER AND CHOPPER AND A SHREDDER/HOGGER SERVED BY TWO CYCLONES

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. Material removed from dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201]
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] Federally Enforceable Through Title V Permit
4. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
5. 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
6. The amount of material collected by the waste paperboard pick-up system and cyclones shall not exceed 20 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
7. PM10 emissions from the waste paperboard pick-up system and cyclones shall not exceed 0.0000082 lb per lb of waste paperboard. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Permittee shall record on a daily basis the amount of waste paperboard collected in tons. [District Rule 2201] Federally Enforceable Through Title V Permit
9. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

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

San Joaquin Valley *Air Pollution Control District*

PERMIT UNIT: N-1980-10-1

EXPIRATION DATE: 09/30/2021

EQUIPMENT DESCRIPTION:

FLEXOGRAPHIC PRINTING OPERATION CONSISTING OF A WEB-FED 4-COLOR EVERS FLEXOGRAPHIC PRINTING PRESS, A 0.6 MMBTU/HR NATURAL GAS-FIRED DRYING OVEN, AN ADHESIVE APPLICATION OPERATION, AND A SCORING/CUTTING/TRIMMING SYSTEM SERVED BY A PAPER WASTEBOARD PICK-UP SYSTEM LISTED IN PERMIT N-1980-7

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] 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. The drying oven shall only be fired on PUC-regulated natural gas. [District Rules 2201 and 4801] Federally Enforceable Through Title V Permit
5. Drying oven emission factors shall not exceed any of the following limits: 0.1 lb-NO_x/MMBtu, 0.00285 lb-SO_x/MMBtu, 0.0076 lb-PM₁₀/MMBtu, 0.084 lb-CO/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
6. VOC content of the following materials shall not exceed any of the following limits: adhesive materials: 2.40 lb/gal excluding water and exempt compounds; ink with ink additives (if any): 2.40 lb/gal excluding water and exempt compounds; cleaning solvent materials for specialty flexographic printing ink application equipment: 0.83 lb/gal. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Ammonia Hydroxide (NH₄OH) content of the following materials shall not exceed any of the following limits: adhesive materials: 4.0 lb/100 lb adhesive; ink additive: 13.0 lb/100 lb ink additive. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Total emissions from all adhesives, inks, ink additives and solvents shall not exceed either of the following limits: 91.5 lb-VOC/day and 2.8 lb-NH₃/day. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Total VOC emissions from all adhesives, inks, ink additives and solvents shall not exceed 23,791 pounds in any rolling 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Total ammonia (NH₃) emissions from all adhesives, inks, ink additives and solvents shall not exceed 988 pounds per year. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Ammonia (NH₃) emissions from each product shall be determined using the following equation: Ammonia Hydroxide (NH₄OH) content (lb-NH₄OH/lb-product) x usage (gal/day or gal/year) x 17.03 ÷ 35.05 x density (lb/gal). [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.

12. For flexographic printing operations, VOC content of graphic arts materials, less water and less exempt compounds, as applied, shall not exceed any of the following limits: flexographic ink on porous substrates: 225 g/l (1.88 lb/gal); all other inks: 300 g/l (2.5 lb/gal); coating: 300 g/l (2.5 lb/gal); adhesive: 150 g/l (1.25 lb/gal); web splicing adhesive: 150 g/l (1.25 lb/gal). [District Rules 2520 and 4607] Federally Enforceable Through Title V Permit
13. For flexographic printing operations, VOC content of specialty ink, less water and less exempt compounds, as applied, shall not exceed any of the following limits: metallic ink: 300 g/l (2.5 lb/gal); matte finish ink: 300 g/l (2.5 lb/gal); metallic ink and matte finish ink on flexible package printing: 300 g/l (2.5 lb/gal). In addition, the specialty inks used shall not exceed two gallons in a calendar day and 120 gallons in a calendar year. [District Rules 2520 and 4607] Federally Enforceable Through Title V Permit
14. 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
15. Cleaning activities that use solvents with a VOC content greater than 25 g/l (0.21 lb/gallon) shall be performed by one or more of the following methods: (1) wipe cleaning; or (2) application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force; or (3) non-atomized solvent flow method in which the cleaning solvent is collected in a container or a collection system which is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container; or (4) solvent flushing method in which the cleaning solvent is discharged into a container that is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container. The discharged solvent from the equipment must be collected into containers without atomizing into the open air. The solvent may be flushed through the system by air or hydraulic pressure, or by pumping. [District Rule 4607] Federally Enforceable Through Title V Permit
16. For a permittee using any solvent containing more than 25 g/L of VOC for organic solvent cleaning, 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
17. For a permittee using any solvent containing more than 25 g/L of VOC for organic solvent cleaning, the permittee shall not use VOC-containing materials 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
18. 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
19. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. The permittee shall properly use and properly operate all graphic arts printing technologies as directed and/or specified by the manufacturer of the printer or graphic arts material. [District Rule 4607] Federally Enforceable Through Title V Permit
20. Permittee shall maintain a current file of inks, adhesives, and solvents in use and in storage. The file shall include material safety data sheet (MSDS) or product data sheet showing the material name, manufacturer's name, VOC content, less water and exempt compounds and Ammonia Hydroxide (NH₄OH) content (or sufficient composition data to calculate these values), material VOC content (or VOC content "as packaged" from manufacturer), mixing instructions, and density. [District Rules 2201 and 4607] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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21. For each ink, adhesive and solvent material used in this operation, the permittee shall record on a daily basis the product/material name, material type (e.g. ink), amount used (gallons), VOC content, less water and exempt compounds (lb-VOC/gal), material VOC content (lb-VOC/gal), the VOC emissions in pounds (material VOC content in lb-VOC/gal multiplied by the usage in gallons), Ammonia Hydroxide (NH₄OH) content (lb-NH₄OH/lb-product), and the ammonia (NH₃) emissions in pounds. [District Rules 2201 and 4607] Federally Enforceable Through Title V Permit
22. Permittee shall record on a daily basis, the type and amount of each specialty ink used at the facility, as defined in Rule 4607. [District Rules 1070 and 4607] Federally Enforceable Through Title V Permit
23. On a monthly basis, the permittee shall calculate and record the monthly VOC emissions from this unit. [District Rule 2201] Federally Enforceable Through Title V Permit
24. The permittee shall calculate and record the annual ammonia (NH₃) emissions from this unit. [District Rule 2201] Federally Enforceable Through Title V Permit
25. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070, 2520, and 4607] Federally Enforceable Through Title V Permit

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

ATTACHMENT C

Detailed Facility List

Detailed Facility Report

For Facility=1980

Sorted by Facility Name and Permit Number

EVERGREEN BEVERAGE PACKAGING 1500 W MAIN ST TURLOCK, CA 95380-0000	FAC # N 1980	TYPE: TOXIC ID:	TitleV 51473	EXPIRE ON: AREA: INSP. DATE:	09/30/2021 6 / 03/22
STATUS: TELEPHONE:	A				

PERMIT NUMBER	FEE DESCRIPTION	FEE RULE	QTY	FEE AMOUNT	TOTAL	FEE PERMIT STATUS	EQUIPMENT DESCRIPTION
N-1980-1-3	0.875 MMBtu/hr	3020-02 D	1	379.00	379.00	D	FLEXOGRAPHIC PRINTING AND CONVERTING SYSTEM (LINE A) SERVED BY AN 875,000 BTU/HR NATURAL GAS-FIRED DRYER *** PERMIT DELETED - FJCRUZ 4/11/2017 ***
N-1980-2-3	0.875 MMBtu/hr	3020-02 D	1	379.00	379.00	A	FLEXOGRAPHIC PRINTING AND CONVERTING SYSTEM (LINE B) SERVED BY AN 875,000 BTU/HR NATURAL GAS-FIRED DRYER
N-1980-3-3	0.875 MMBtu/hr	3020-02 D	1	379.00	379.00	A	FLEXOGRAPHIC PRINTING AND CONVERTING SYSTEM (LINE C) SERVED BY AN 875,000 BTU/HR NATURAL GAS-FIRED DRYER
N-1980-4-3	0.875 MMBtu/hr	3020-02 D	1	379.00	379.00	A	FLEXOGRAPHIC PRINTING AND CONVERTING SYSTEM (LINE D) SERVED BY AN 875,000 BTU/HR NATURAL GAS-FIRED DRYER
N-1980-5-3	0.875 MMBtu/hr	3020-02 D	1	379.00	379.00	A	FLEXOGRAPHIC PRINTING AND CONVERTING SYSTEM (LINE E) SERVED BY AN 875,000 BTU/HR NATURAL GAS-FIRED DRYER
N-1980-6-3	0.875 MMBtu/hr	3020-02 D	1	379.00	379.00	A	FLEXOGRAPHIC PRINTING AND CONVERTING SYSTEM (LINE F) SERVED BY AN 875,000 BTU/HR NATURAL GAS-FIRED DRYER
N-1980-7-5	50 HP	3020-01 C	1	239.00	239.00	A	WASTE PAPERBOARD PICK-UP SYSTEM, BLOWER AND CHOPPER AND A SHREDDER/HOGGER SERVED BY TWO CYCLONES
N-1980-10-1	0.6 MMBtu/hr	3020-02 C	1	239.00	239.00	A	FLEXOGRAPHIC PRINTING OPERATION CONSISTING OF A WEB-FED 4-COLOR EVERS FLEXOGRAPHIC PRINTING PRESS, A 0.6 MMBTU/HR NATURAL GAS-FIRED DRYING OVEN, AN ABHESIVE APPLICATION OPERATION, AND A SCORING/CUTTING/TRIMMING SYSTEM SERVED BY A PAPER WASTEBOARD PICK-UP SYSTEM LISTED IN PERMIT N-1980-7

Number of Facilities Reported: 1

ATTACHMENT D

Rule 4601 Stringency Analysis

Stringency Comparison of District Rule 4601 Non-SIP Version (4/16/20) to Current SIP Version (12/17/09)

Requirement Category	SIP Version of Rule 4601 (12/17/09)	Non-SIP Version of Rule 4601 (4/16/20)	Conclusion
2.0 Applicability	This rule is applicable to any person who supplies, sells, offers for sale, applies, or solicits the application of any architectural coating, or who manufactures, blends or repackages any architectural coating for use within the District.	This rule is applicable to any person who supplies, markets, sells, offers for sale, applies, or solicits the application of any architectural coating, or who manufactures, blends or repackages any architectural coating for use within the District.	The only change is to include applicability of this rule to the person marketing the coatings, therefore, non-SIP version of rule is more stringent than SIP version.
4.0 Exemptions	<p>4.1 The provisions of this rule shall not apply to:</p> <p>4.1.1 Any architectural coating that is supplied, sold, offered for sale, or manufactured for use outside of the District or for shipment to other manufacturers for reformulation or repackaging.</p> <p>4.1.2 Any aerosol coating product.</p> <p>4.2 With the exception of Section 6.2, the provisions of this rule shall not apply to any architectural coating that is sold in a container with a volume of one liter (1.057 quarts) or less.</p>	<p>4.1 The provisions of this rule shall not apply to:</p> <p>4.1.1 Any architectural coating that is supplied, sold, offered for sale, or manufactured for use outside of the District or for shipment to other manufacturers for reformulation or repackaging.</p> <p>4.1.2 Any aerosol coating product.</p> <p>4.2 With the exception of Section 6.2 and Section 4.3, the provisions of this rule shall not apply to any architectural coating that is sold in a container with a volume of one liter (1.057 quarts) or less, provided the following requirements are met:</p> <p>4.2.1 The coating container is not bundled together with other containers of the same specific coating category (listed in Table 1) to be sold as a unit that exceeds one liter (1.057 quart), excluding containers packed together for shipping to a retail outlet, and</p> <p>4.2.2 The label or any other product literature does not suggest combining multiple containers of the same specific category (listed in Table 1) so that the combination exceeds one liter (1.057 quart).</p> <p>4.3 On and after sixty days following the effective date of EPA final rulemaking that the conditions described in Clean Air Act Sections 172(c)(9) and 182(c)(9) have occurred in the San Joaquin Valley regarding the 2008 8-hour Ozone National Ambient Air Quality Standard, the categories of coatings listed below shall no longer be exempt from the provisions of Table 1 of this rule when sold in containers having capacities of one liter (1.057 quarts) or less:</p> <p>4.3.1 Bituminous Roof Coatings;</p> <p>4.3.2 Flat Coatings that are sold in containers having capacities greater than eight fluid ounces;</p> <p>4.3.3 Magnesite Cement Coatings;</p> <p>4.3.4 Multi-Color Coatings;</p>	The exemptions for colorant and for architectural coatings sold in a container with a volume of one liter (1.057 quarts) or less have been added to the rule in order to make the amended rule consistent with the exemptions presented in 2020 California Air Resources Board (ARB) Suggested Control Measures (SCM) for Architectural Coatings. Therefore, the non-SIP version of the rule is as stringent as the SIP version of the rule.

Requirement Category	SIP Version of Rule 4601 (12/17/09)	Non-SIP Version of Rule 4601 (4/16/20)	Conclusion
		<p>4.3.5 Nonflat Coatings that are sold in containers having capacities greater than eight fluid ounces;</p> <p>4.3.6 Pre-Treatment Wash Primers;</p> <p>4.3.7 Reactive Penetrating Sealers;</p> <p>4.3.8 Shellacs (Clear and Opaque);</p> <p>4.3.9 Stone Consolidants;</p> <p>4.3.10 Swimming Pool Coatings;</p> <p>4.3.11 Tub and Tile Refinishing Coatings;</p> <p>4.3.12 Wood Coatings, including Lacquers, Varnishes, and Sanding Sealers; and</p> <p>4.3.13 Wood Preservatives.</p> <p>4.4 Colorant added at the factory or at the worksite is not subject to the VOC limits in Table 2. In addition, containers of colorant sold at the point of sale for use in the field or on a job site are also not subject to the VOC limit in Table 2.</p>	
<p>5.0 Requirements</p>	<p>5.1 VOC Content Limits: Except as provided in Sections 5.2 and 5.3, no person shall manufacture, blend, or repackage for use within the District; or supply, sell, or offer for sale within the District; or solicit for application or apply within the District any architectural coating with a VOC content in excess of the corresponding limit specified in the Table of Standards 1 or the Table of Standards 2, after the specified effective date in the Table of Standards 1 or the Table of Standards 2. Limits are expressed as VOC Regulatory, thinned to the manufacturer's maximum thinning recommendation, excluding any colorant added to tint bases.</p>	<p>5.1 VOC Content Limits: Except as provided in Sections 5.2 and 5.3, no person shall manufacture, blend, or repackage for use within the District; or supply, sell, market or offer for sale within the District; or solicit for application or apply within the District any architectural coating or colorant with a VOC content in excess of the corresponding limit specified in Table 1 or Table 2, after the specified effective date in Table 1 or Table 2. Limits are expressed as VOC Regulatory, thinned to the manufacturer's maximum thinning recommendation, excluding any colorant added to tint bases.</p>	<p>The Table of Standards 1 and the Table of Standard 2 have been replaced with more stringent Table 1 with VOC content limit for coatings and Table 2 with VOC content limit for colorants with more stringent VOC limits as shown in the tables at the end of this document. Therefore, the non-SIP version of the rule is more stringent than the SIP version of the rule.</p>
	<p>5.2 Most Restrictive VOC Limit: If a coating meets the definition in Section 3.0 for one or more specialty coating categories listed in the Table of Standards 1 or the Table of Standards 2, then that coating is not required to meet the VOC limits for Flat, Nonflat, or Nonflat – High Gloss coatings, but is required to meet the VOC limit for the applicable specialty coating listed in the Table of Standards 1 or the Table of Standards 2.</p> <p>5.2.1 Effective until December 31, 2010, with the exception of the specialty coating categories specified in Section 5.2.3.1 through 5.2.3.15, if a coating is recommended for use in more than one of the specialty coating categories listed in the Table of Standards 1, the most restrictive (or lowest) VOC content limit shall apply.</p> <p>5.2.2 Effective on and after January 1, 2011, with the exception of the specialty coating categories specified in Sections 5.2.3.2, 5.2.3.3, 5.2.3.5 through 5.2.3.9, and 5.2.3.14 through 5.2.3.18, if a coating is recommended for use in more than one of the</p>	<p>5.2 Most Restrictive VOC Limit: If a coating meets the definition in Section 3.0 for one or more specialty coating categories listed in Table 1 or, then that coating is not required to meet the VOC limits for Flat or Nonflat coatings, but is required to meet the VOC limit for the applicable specialty coating listed in Table 1 or . With the exception of the specialty coating categories specified in Sections 5.2.1 through 5.2.12, if a coating is recommended for use in more than one of the specialty coating categories listed in Table 1, then the most restrictive (or lowest) VOC content limit shall apply. This requirement applies to: usage recommendations that appear anywhere on the coating container, anywhere on any label or sticker affixed to the container, or in any sales, advertising, or technical literature supplied by a manufacturer or anyone acting on their behalf.</p>	<p>The VOC limit of the non-SIP version is at least as stringent as the SIP version. Therefore, the non-SIP version of the rule is more stringent than the SIP version of the rule.</p>

Requirement Category	SIP Version of Rule 4601 (12/17/09)	Non-SIP Version of Rule 4601 (4/16/20)	Conclusion
	<p>specialty coating categories listed in the Table of Standards 2, the most restrictive (or lowest) VOC content limit shall apply.</p> <p>5.2.3 This requirement applies to: usage recommendations that appear anywhere on the coating container, anywhere on any label or sticker affixed to the container, or in any sales, advertising, or technical literature supplied by a manufacturer or anyone acting on their behalf.</p> <p>5.2.3.1 Lacquer coatings (including lacquer sanding sealers)</p> <p>5.2.3.2 Metallic pigmented coatings</p> <p>5.2.3.3 Shellacs</p> <p>5.2.3.4 Fire-retardant coatings</p> <p>5.2.3.5 Pretreatment wash primers</p> <p>5.2.3.6 Industrial maintenance coatings</p> <p>5.2.3.7 Low-solids coatings</p> <p>5.2.3.8 Wood preservatives</p> <p>5.2.3.9 High temperature coatings</p> <p>5.2.3.10 Temperature-indicator safety coatings</p> <p>5.2.3.11 Antenna coatings</p> <p>5.2.3.12 Antifouling coatings</p> <p>5.2.3.13 Flow coatings</p> <p>5.2.3.14 Bituminous roof primers</p> <p>5.2.3.15 Specialty primers, sealers and undercoaters</p> <p>5.2.3.16 Aluminum roof coatings</p> <p>5.2.3.17 Zinc-rich primers</p> <p>5.2.3.18 Wood Coatings</p>	<p>5.2.1 Metallic pigmented coatings;</p> <p>5.2.2 Shellacs;</p> <p>5.2.3 Pretreatment wash primers;</p> <p>5.2.4 Industrial maintenance coatings;</p> <p>5.2.5 Low-solids coatings;</p> <p>5.2.6 Wood preservatives;</p> <p>5.2.7 High temperature coatings;</p> <p>5.2.8 Bituminous roof primers;</p> <p>5.2.9 Specialty primers, sealers and undercoaters;</p> <p>5.2.10 Aluminum roof coatings;</p> <p>5.2.11 Zinc-rich primers; and</p> <p>5.2.12 Wood Coatings.</p>	
	<p>5.3 Sell-Through of Coatings: A coating manufactured prior to the effective date specified for that coating in the Table of Standards 1 or the Table of Standards 2, and that complied with the standards in effect at the time the coating was manufactured, may be sold, supplied, or offered for sale for up to three years after the specified effective date. In addition, a coating manufactured before the effective date specified for that coating in the Table of Standards 1 or the Table of Standards 2 may be applied at any time, both before and after the specified effective date, so long as the coating complied with the standards in effect at the time the coating was manufactured. This Section 5.3 does not apply to any coating that does not display the date or date-code required by Section 6.1.1.</p>	<p>5.3 Sell-Through of Coatings: 5.3.1 A coating manufactured prior to January 1, 2022, may be sold, supplied, or offered for sale for up to three years after January 1, 2022. In addition, a coating manufactured before January 1, 2022 may be applied at any time, both before and after January 1, 2022, so long as the coating complied with the standards in effect at the time the coating was manufactured. This subsection 5.3.1 does not apply to any coating that does not display the date or date-code required by subsection 6.1.1. 5.3.2 A colorant manufactured prior to January 1, 2022, may be sold, supplied, or offered for sale for up to three years after January 1, 2022. In addition, a colorant manufactured before January 1, 2022 may be applied at any time, both before and after January 1, 2022, so long as the colorant complied with the standards in effect at the time the colorant was manufactured. This subsection 5.3.2 does not apply to any colorant that does not display the date or date-code required by subsection 6.1.1.</p>	<p>The VOC limit of the non-SIP version is at least as stringent as the SIP version. Therefore, the non-SIP version of the rule is more stringent than the SIP version of the rule.</p>
	<p>5.4 Painting Practices: All architectural coating containers used to apply the contents therein to a surface directly from the container by pouring, siphoning, brushing, rolling, padding, ragging or other means,</p>	<p>5.4 Painting Practices: All architectural coating containers used to apply the contents therein to a surface directly from the container by pouring, siphoning, brushing, rolling, padding,</p>	<p>No change in the requirements, therefore, non-SIP version of rule is as stringent as SIP version.</p>

Requirement Category	SIP Version of Rule 4601 (12/17/09)	Non-SIP Version of Rule 4601 (4/16/20)	Conclusion
	shall be closed when not in use. These architectural coating containers include, but are not limited to, drums, buckets, cans, pails, trays or other application containers. Containers of any VOC-containing materials used for thinning and cleanup shall also be closed when not in use.	ragging or other means, shall be closed when not in use. These architectural coating containers include, but are not limited to, drums, buckets, cans, pails, trays or other application containers. Containers of any VOC-containing materials used for thinning and cleanup shall also be closed when not in use.	
	5.5 Thinning: No person who applies or solicits the application of any architectural coating shall apply a coating that is thinned to exceed the applicable VOC limit specified in the Table of Standards 1 or the Table of Standards 2.	5.5 Thinning: No person who applies or solicits the application of any architectural coating shall apply a coating that is thinned to exceed the applicable VOC limit specified in the Table of Standards 1 or the Table of Standards 2.	No change in the requirements, therefore, non-SIP version of rule is as stringent as SIP version.
	5.6 Rust Preventative Coatings: Effective through December 31, 2010, no person shall apply or solicit the application of any rust preventative coating for industrial use, unless such a rust preventative coating complies with the industrial maintenance coating VOC limit specified in the Table of Standards 1.		The VOC limit of the SIP version is no longer applicable at this time and has been removed.
	5.7 Coatings Not Listed in the Table of Standards 1 or the Table of Standards 2: For any coating that does not meet any of the definitions for the specialty coatings categories listed in the Table of Standards 1 or the Table of Standards 2, the VOC content limit shall be determined by classifying the coating as a Flat, Nonflat, or Nonflat – High Gloss coating, based on its gloss, and the corresponding Flat, Nonflat, or Nonflat – High Gloss VOC limit in the Table of Standards 1 or the Table of Standards 2 shall apply.	5.6 Coatings Not Listed in Table 1: For any coating that does not meet any of the definitions for the specialty coatings categories listed in Table 1, the VOC content limit shall be determined by classifying the coating as Flat or Nonflat, based on its gloss, and the corresponding Flat or Nonflat VOC limit in Table 1 shall apply.	The VOC limit of the non-SIP version is at least as stringent as the SIP version. Therefore, the non-SIP version of the rule is more stringent than the SIP version of the rule.
		5.7 Colorants: No person within the District shall, at the point of sale of any architectural coating subject to subsection 5.1, add to such coating any colorant that contains VOCs in excess of the corresponding applicable VOC limit specified in Table 2. The point of sale includes retail outlets that add colorant to a coating container to obtain a specific color.	The VOC limit for colorants in non-SIP version more stringent than the SIP version of the rule.
	5.8 Prior to January 1, 2011, any coating that meets a definition in Section 3.0 for a coating category listed in the Table of Standards 2 and complies with the applicable VOC limit in the Table of Standards 2 and with Sections 5.2 and 6.1 (including those provision of Section 6.1 otherwise effective on January 1, 2011) shall be considered in compliance with this rule.		The VOC limit of the SIP version is no longer applicable at this time and has been removed.
Table of Standards 1 (Effective on and after 1/1/11)		Table 1 VOC Content Limits for Coatings (Effective on and after 1/1/22) (See end of the document for Table Comparison)	The requirements of Table of Standard 1 are more stringent than the Table 1 in the SIP rule. Therefore, non-SIP version of rule is as stringent as SIP version.

Requirement Category	SIP Version of Rule 4601 (12/17/09)	Non-SIP Version of Rule 4601 (4/16/20)	Conclusion
	Table of Standards 2 (Effective on and after 1/1/11)	Table 2 VOC Content Limits for Colorants (Effective on and after 1/1/22) (See end of the document for Table Comparison)	VOC content limits for colorants were added under the amended rule. Therefore, the non-SIP version of the rule is more stringent than the SIP version of the rule.
6.0 Administrative Requirements	<p>6.1 Labeling Requirements: Each manufacturer of any architectural coating subject to this rule shall display the information listed in Sections 6.1.1 through 6.1.14 on the coating container (or label) in which the coating is sold or distributed.</p> <p>6.1.1 Date Code: The date the coating was manufactured, or a date code representing the date, shall be indicated on the label, lid or bottom of the container. If the manufacturer uses a date code for any coating, the manufacturer shall file an explanation of each code with the Executive Officer of the ARB.</p> <p>6.1.2 Thinning Recommendations: A statement of the manufacturer's recommendation regarding thinning of the coating shall be indicated on the label or lid of the container. This requirement does not apply to the thinning of architectural coatings with water. If thinning of the coating prior to use is not necessary, the recommendation must specify that the coating is to be applied without thinning.</p> <p>6.1.3 VOC Content: Each container of any coating subject to this rule shall display one of the following values, in grams of VOC per liter of coating:</p> <p>6.1.3.1 Maximum VOC Content, as determined from all potential product formulations; or</p> <p>6.1.3.2 VOC Content, as determined from actual formulation data; or</p> <p>6.1.3.3 VOC Content, as determined using the test methods in Section 6.3.2.</p> <p>If the manufacturer does not recommend thinning, the container must display the VOC Content, as supplied. If the manufacturer recommends thinning, the container must display the VOC Content, including the maximum amount of thinning solvent recommended by the manufacturer. If the coating is a multicomponent product, the container must display the VOC content as mixed or catalyzed. If the coating contains silanes, siloxanes, or other ingredients that generate ethanol or other VOCs during the curing process, the VOC content must include the VOCs emitted during curing.</p> <p>6.1.4 Faux Finishing Coatings: Effective January 1, 2011, the labels of all clear topcoat Faux Finishing coatings shall prominently display the statement "This product can only be sold or used as part</p>	<p>6.1 Labeling Requirements: Each manufacturer of any architectural coating subject to this rule shall display the information listed in Sections 6.1.1 through 6.1.12 on the coating container (or label) in which the coating is sold or distributed.</p> <p>6.1.1 Date Code: The date the coating was manufactured, or a date code representing the date, shall be indicated on the label, lid or bottom of the container. If the manufacturer uses a date code for any coating, the manufacturer shall file an explanation of each code with the Executive Officer of the ARB.</p> <p>6.1.2 Thinning Recommendations: A statement of the manufacturer's recommendation regarding thinning of the coating shall be indicated on the label or lid of the container. This requirement does not apply to the thinning of architectural coatings with water. If thinning of the coating prior to use is not necessary, the recommendation must specify that the coating is to be applied without thinning.</p> <p>6.1.3 VOC Content: Each container of any coating subject to this rule shall display one of the following values, in grams of VOC per liter of coating:</p> <p>6.1.3.1 Maximum VOC Content, as determined from all potential product formulations; or</p> <p>6.1.3.2 VOC Content, as determined from actual formulation data; or</p> <p>6.1.3.3 VOC Content, as determined using the test methods in Section 6.3.2.</p> <p>If the manufacturer does not recommend thinning, the container must display the VOC Content, as supplied. If the manufacturer recommends thinning, the container must display the VOC Content, including the maximum amount of thinning solvent recommended by the manufacturer. If the coating is a multicomponent product, the container must display the VOC content as mixed or catalyzed. If the coating contains silanes, siloxanes, or other ingredients that generate ethanol or other VOCs during the curing process, the VOC content must include the VOCs emitted during curing. VOC Content shall be determined as defined in subsections</p>	The non-SIP approved rule contain sections listed in the SIP rule plus additional requirements not found in the SIP version for colorants. Therefore, non-SIP version of rule is as stringent as SIP version.

Requirement Category	SIP Version of Rule 4601 (12/17/09)	Non-SIP Version of Rule 4601 (4/16/20)	Conclusion
	<p>of a Faux Finishing coating system”.</p> <p>6.1.5 Industrial Maintenance Coatings: Each manufacturer of any industrial maintenance coating subject to this rule shall display on the label or lid of the container in which the coating is sold or distributed one or more of the following descriptions listed in Section 6.1.5.1 through 6.1.5.3.</p> <p>6.1.5.1 “For industrial use only”</p> <p>6.1.5.2 “For professional use only”</p> <p>6.1.5.3 “Not for residential use” or “Not intended for residential use”</p> <p>6.1.6 Clear Brushing Lacquers: The labels of all clear brushing lacquers shall prominently display the statements “For brush application only,” and “This product must not be thinned or sprayed.” (Category deleted effective January 1, 2011.)</p> <p>6.1.7 Rust Preventative Coatings: The labels of all rust preventative coatings shall prominently display the statement “For Metal Substrates Only”.</p> <p>6.1.8 Specialty Primers, Sealers and Undercoaters: Effective until December 31, 2010, the labels of all specialty primers, sealers and undercoaters shall prominently display one or more of the descriptions listed in Section 6.1.8.1 through 6.1.8.5. Effective on and after January 1, 2011, the labels of all specialty primers, sealers, and undercoaters shall prominently display one or more of the descriptions listed in Sections 6.1.8.1 through 6.1.8.3. On and after January 1, 2011, Sections 6.1.8.4 and 6.1.8.5 will be no longer effective.</p> <p>6.1.8.1 For fire-damaged substrates.</p> <p>6.1.8.2 For smoke-damaged substrates.</p> <p>6.1.8.3 For water-damaged substrates.</p> <p>6.1.8.4 For excessively chalky substrates.</p> <p>6.1.8.5 For blocking stains.</p> <p>6.1.9 Quick Dry Enamels: The labels of all quick dry enamels shall prominently display the words “Quick Dry” and the dry hard time. (Category deleted effective January 1, 2011.)</p> <p>6.1.10 Reactive Penetrating Sealers: Effective January 1, 2011, the labels of all Reactive Penetrating Sealers shall prominently display the statement “Reactive Penetrating Sealer.”</p> <p>6.1.11 Stone Consolidants: Effective January 1, 2011, the labels of all Stone Consolidants shall prominently display the statement “Stone Consolidant - For Professional Use Only.”</p> <p>6.1.12 Nonflat– High Gloss Coatings: The labels of all Nonflat – high gloss coatings shall prominently display the words “High Gloss.”</p>	<p>3.72, 3.73, and 3.74.</p> <p>6.1.4 Faux Finishing Coatings: The labels of all clear topcoat Faux Finishing coatings shall prominently display the statement “This product can only be sold or used as part of a Faux Finishing coating system”.</p> <p>6.1.5 Industrial Maintenance Coatings: Each manufacturer of any industrial maintenance coating subject to this rule shall display on the label or lid of the container in which the coating is sold or distributed one or more of the following descriptions listed in Section 6.1.5.1 through 6.1.5.3.</p> <p>6.1.5.1 “For industrial use only”</p> <p>6.1.5.2 “For professional use only”</p> <p>6.1.6 Rust Preventative Coatings: The labels of all rust preventative coatings shall prominently display the statement “For Metal Substrates Only”.</p> <p>6.1.7 Specialty Primers, Sealers and Undercoaters: The labels of all specialty primers, sealers, and undercoaters shall prominently display the statement “Specialty Primer, Sealer, Undercoater”</p> <p>6.1.8 Reactive Penetrating Sealers: The labels of all Reactive Penetrating Sealers shall prominently display the statement “Reactive Penetrating Sealer.”</p> <p>6.1.9 Stone Consolidants: The labels of all Stone Consolidants shall prominently display the statement “Stone Consolidant - For Professional Use Only.”</p> <p>6.1.10 Wood Coatings: The labels of all Wood Coatings shall prominently display the statement “For Wood Substrates Only.”</p> <p>6.1.11 Zinc Rich Primers: The labels of all Zinc Rich Primers shall prominently display the statement “For professional use only.”</p> <p>6.1.12 Colorants: Effective January 1, 2022, each manufacturer of any colorant subject to this rule shall display the information listed in subsections 6.1.12.1 and 6.1.12.2 on the container (or label) in which the colorant is sold or distributed.</p> <p>6.1.12.1 Date Code: The date the colorant was manufactured, or a date code representing the date, shall be indicated on the label, lid, or bottom of the container. If the manufacturer uses a date code for any colorant, the manufacturer shall file an explanation of each code with the APCO.</p> <p>6.1.12.2 VOC Content: Each container of any colorant subject to this rule shall display one of the following values in grams of VOC per liter of</p>	

Requirement Category	SIP Version of Rule 4601 (12/17/09)	Non-SIP Version of Rule 4601 (4/16/20)	Conclusion
	<p>6.1.13 Wood Coatings: Effective January 1, 2011, the labels of all Wood Coatings shall prominently display the statement "For Wood Substrates Only."</p> <p>6.1.14 Zinc Rich Primers: Effective January 1, 2011, the labels of all Zinc Rich Primers shall prominently display one or more of the following descriptions listed in Section 6.1.14.1 through 6.1.14.3.</p> <p>6.1.14.1 "For industrial use only"</p> <p>6.1.14.2 "For professional use only"</p> <p>6.1.14.3 "Not for residential use" or "Not intended for residential use"</p>	<p>colorant.</p> <p>6.1.12.2.1 Maximum VOC Content as determined from all potential product formulations; or</p> <p>6.1.12.2.2 VOC Content as determined from actual formulation data; or</p> <p>6.1.12.2.3 VOC Content as determined using the test methods in subsection 6.3.2.</p> <p>If the colorant contains silanes, siloxanes, or other ingredients that generate ethanol or other VOCs during the curing process, the VOC content must include the VOCs emitted during curing. VOC Content shall be determined as defined in subsections 3.72, 3.73, and 3.74.</p>	
	<p>6.2 Reporting Requirements</p> <p>The reporting requirements specified in Sections 6.2.1 through 6.2.6 shall apply until December 31, 2010.</p> <p>6.2.1 Clear Brushing Lacquers: Each manufacturer of clear brushing lacquers shall, on or before April 1 of each calendar year beginning in the year 2004, submit an annual report to the Executive Officer of the ARB. The report shall specify the number of gallons of clear brushing lacquers sold in the State during the preceding calendar year, and shall describe the method used by the manufacturer to calculate State sales.</p> <p>6.2.2 Rust Preventative Coatings: Each manufacturer of rust preventative coatings shall, on or before April 1 of each calendar year beginning in the year 2004, submit an annual report to the Executive Officer of the ARB. The report shall specify the number of gallons of rust preventative coatings sold in the State during the preceding calendar year, and shall describe the method used by the manufacturer to calculate State sales.</p> <p>6.2.3 Specialty Primers, Sealers and Undercoaters: Each manufacturer of specialty primers, sealers and undercoaters shall, on or before April 1 of each calendar year beginning in the year 2004, submit an annual report to the Executive Officer of the ARB. The report shall specify the number of gallons of specialty primers, sealers and undercoaters sold in the State during the preceding calendar year, and shall describe the method used by the manufacturer to calculate State sales.</p> <p>6.2.4 Toxic Exempt Compounds: For each architectural coating that contains perchloroethylene or methylene chloride, the manufacturer shall, on or before April 1 of each calendar year beginning in the year 2004, submit an annual report to the Executive Officer of</p>	<p>6.2 Reporting Requirements</p> <p>6.2.1 Sales Data: All sales data listed in Sections 6.2.1.1 to 6.2.1.14 shall be maintained on-site by the responsible official for a minimum of three years. A responsible official from each manufacturer shall upon request of the Executive Officer of CARB, or his or her delegate, provide data concerning the distribution and sales of architectural coatings. Sales data submitted by the responsible official to the Executive Officer of the ARB may be claimed as confidential, and such information shall be handled in accordance with the procedures specified in Title 17, California Code of Regulations Sections 91000-91022. The responsible official shall within 180 days provide information, including, but not limited to the data listed in Sections 6.2.1.1 through 6.2.1.14:</p> <p>6.2.1.1 The name and mailing address of the manufacturer;</p> <p>6.2.1.2 The name, address and telephone number of a contact person;</p> <p>6.2.1.3 The name of the coating product as it appears on the label and the applicable coating category;</p> <p>6.2.1.4 Whether the product is marketed for interior or exterior use or both;</p> <p>6.2.1.5 The number of gallons sold in California in containers greater than one liter (1.057 quart) and equal to or less than one liter (1.057 quart);</p> <p>6.2.1.6 The VOC Actual content and VOC Regulatory content in grams per liter. If thinning is recommended, list the VOC Actual content and VOC Regulatory content after maximum recommended thinning. If containers less</p>	<p>All the reporting requirements were removed except the sales data requirements presented in 2020 California Air Resources Board (ARB) Suggested Control Measures (SCM) for Architectural Coatings in order to make the amended rule consistent with SCM. Therefore, non-SIP version of rule is as stringent as SIP version.</p>

Requirement Category	SIP Version of Rule 4601 (12/17/09)	Non-SIP Version of Rule 4601 (4/16/20)	Conclusion
	<p>the ARB the following information for products sold in the State during the preceding year:</p> <p>6.2.4.1 the product brand name and a copy of the product label with legible usage instructions;</p> <p>6.2.4.2 the product category listed in the Table of Standards 1 or the Table of Standards 2 to which the coating belongs;</p> <p>6.2.4.3 the total sales in California during the calendar year to the nearest gallon;</p> <p>6.2.4.4 the volume percent, to the nearest 0.10 percent, of perchloroethylene and methylene chloride in the coating.</p> <p>6.2.5 Recycled Coatings: Manufacturers of recycled coatings must submit a letter to the Executive Officer of the ARB certifying their status as a Recycled Paint Manufacturer. The manufacturer shall, on or before April 1 of each calendar year beginning with the year 2004, submit an annual report to the Executive Officer of the ARB. The report shall include, for all recycled coatings, the total number of gallons distributed in the State during the preceding year, and shall describe the method used by the manufacturer to calculate State distribution.</p> <p>6.2.6 Bituminous Coatings: Each manufacturer of bituminous roof coatings or bituminous roof primers shall, on or before April 1 of each calendar year beginning with the year 2004, submit an annual report to the Executive Officer of ARB. The report shall specify the number of gallons of bituminous roof coatings or bituminous roof primers sold in the State during the preceding calendar year, and shall describe the method used by the manufacturer to calculate state sales.</p> <p>6.2.7 Effective on and after January 1, 2011, Sales Data: All sales data listed in Sections 6.2.7.1 to 6.2.7.14 shall be maintained on-site by the responsible official for a minimum of three years. A responsible official from each manufacturer shall upon request of the Executive Officer of the ARB, or his or her delegate, provide data concerning the distribution and sales of architectural coatings. Sales data submitted by the responsible official to the Executive Officer of the ARB may be claimed as confidential, and such information shall be handled in accordance with the procedures specified in Title 17, California Code of Regulations Sections 91000-91022. The responsible official shall within 180 days provide information, including, but not limited to the data listed in Sections</p>	<p>than one liter have a different VOC content than containers greater than one liter, list separately. If the coating is a multi-component product, provide the VOC content as mixed or catalyzed;</p> <p>6.2.1.7 The names and CAS numbers of the VOC constituents in the product;</p> <p>6.2.1.8 The names and CAS numbers of any compounds in the product specifically exempted from the VOC definition;</p> <p>6.2.1.9 Whether the product is marketed as solvent-borne, waterborne, or 100% solids;</p> <p>6.2.1.10 Description of resin or binder in the product;</p> <p>6.2.1.11 Whether the coating is a single-component or multi-component product;</p> <p>6.2.1.12 The density of the product in pounds per gallon;</p> <p>6.2.1.13 The percent by weight of: solids, all volatile materials, water, and any compounds in the product specifically exempted from the VOC definition; and</p> <p>6.2.1.14 The percent by volume of: solids, water, and any compounds in the product specifically exempted from the VOC definition.</p>	

Requirement Category	SIP Version of Rule 4601 (12/17/09)	Non-SIP Version of Rule 4601 (4/16/20)	Conclusion
	<p>6.2.7.1 through 6.2.7.14:</p> <p>6.2.7.1 the name and mailing address of the manufacturer;</p> <p>6.2.7.2 the name, address and telephone number of a contact person;</p> <p>6.2.7.3 the name of the coating product as it appears on the label and the applicable coating category;</p> <p>6.2.7.4 whether the product is marketed for interior or exterior use or both;</p> <p>6.2.7.5 the number of gallons sold in California in containers greater than one liter (1.057 quart) and equal to or less than one liter (1.057 quart);</p> <p>6.2.7.6 the VOC Actual content and VOC Regulatory content in grams per liter. If thinning is recommended, list the VOC Actual content and VOC Regulatory content after maximum recommended thinning. If containers less than one liter have a different VOC content than containers greater than one liter, list separately. If the coating is a multi-component product, provide the VOC content as mixed or catalyzed;</p> <p>6.2.7.7 the names and CAS numbers of the VOC constituents in the product;</p> <p>6.2.7.8 the names and CAS numbers of any compounds in the product specifically exempted from the VOC definition;</p> <p>6.2.7.9 whether the product is marketed as solvent-borne, waterborne, or 100% solids;</p> <p>6.2.7.10 description of resin or binder in the product;</p> <p>6.2.7.11 whether the coating is a single-component or multi-component product;</p> <p>6.2.7.12 the density of the product in pounds per gallon;</p> <p>6.2.7.13 the percent by weight of: solids, all volatile materials, water, and any compounds in the product specifically exempted from the VOC definition; and</p> <p>6.2.7.14 the percent by volume of: solids, water, and any compounds in the product specifically exempted from the VOC definition.</p>		
	<p>6.3 Test Methods</p> <p>The test methods listed below shall be used to demonstrate compliance with this rule. Alternate equivalent test methods</p>	<p>6.3 Test Methods</p> <p>The test methods listed below shall be used to demonstrate compliance with this rule. Alternate equivalent test</p>	<p>Numerous definitions were added, deleted or modified in order to make the amended rule</p>

Requirement Category	SIP Version of Rule 4601 (12/17/09)	Non-SIP Version of Rule 4601 (4/16/20)	Conclusion
	<p>may be used provided the test methods have been approved by the APCO and EPA.</p> <p>6.3.1 Calculation of VOC Content: For the purpose of determining compliance with the VOC content limits in the Table of Standards 1 or the Table of Standards 2, the VOC content of a coating shall be determined as defined in Section 3.77, 3.78, or 3.79 as appropriate. The VOC content of a tint base shall be determined without colorant that is added after the tint base is manufactured. If the manufacturer does not recommend thinning, the VOC Content must be calculated for the product as supplied. If the manufacturer recommends thinning, the VOC Content must be calculated including the maximum amount of thinning solvent recommended by the manufacturer. If the coating is a multi-component product, the VOC content must be calculated as mixed or catalyzed. If the coating contains silanes, siloxanes, or other ingredients that generate ethanol or other VOC during the curing process, the VOC content must include the VOCs emitted during curing.</p> <p>6.3.2 VOC Content of Coatings: To determine the physical properties of a coating in order to perform the calculations in Section 3.77 and 3.79, the reference method for VOC content is EPA Method 24, except as provided in Sections 6.3.3 and 6.3.16. An alternative method to determine the VOC content of coatings is SCAQMD Method 304-91 (Revised February 1996). The exempt compounds content shall be determined by SCAQMD Method 303-91 (Revised 1993), BAAQMD Method 43 (Revised 1996), or BAAQMD Method 41 (Revised 1995), as applicable. To determine the VOC content of a coating, the manufacturer may use EPA Method 24, or an alternative method as provided in Section 6.3.3, formulation data, or any other reasonable means for predicting that the coating has been formulated as intended (e.g., quality assurance checks, recordkeeping). However, if there are any inconsistencies between the results of EPA Method 24 test and any other means for determining VOC content, the EPA Method 24 test results will govern, except when an alternative method is approved as specified in Section 6.3.3. The District Air Pollution Control Officer (APCO) may require the manufacturer to conduct an EPA Method 24 analysis.</p> <p>6.3.3 Alternative Test Methods: Other test methods demonstrated to provide results that are acceptable for purposes</p>	<p>methods may be used provided the test methods have been approved by the APCO and EPA.</p> <p>6.3.1 Calculation of VOC Content: For the purpose of determining compliance with the VOC content limits in Table 1 or the 2, the VOC content of a coating shall be determined as defined in Section 3.71, 3.72, or 3.73 as appropriate. The VOC content of a tint base shall be determined without colorant that is added after the tint base is manufactured. If the manufacturer does not recommend thinning, the VOC Content must be calculated for the product as supplied. If the manufacturer recommends thinning, the VOC Content must be calculated including the maximum amount of thinning solvent recommended by the manufacturer. If the coating is a multi-component product, the VOC content must be calculated as mixed or catalyzed. If the coating contains silanes, siloxanes, or other ingredients that generate ethanol or other VOC during the curing process, the VOC content must include the VOCs emitted during curing.</p> <p>6.3.2 VOC Content of Coatings: To VOC Content of Coatings or Colorants: To determine the physical properties of a coating or colorant in order to perform the calculations in Section 3.71 and 3.73, the reference method for VOC content is EPA Method 24, except as provided in Sections 6.3.3 and 6.3.15. An alternative method to determine the VOC content of coatings or colorants is SCAQMD Method 304-91 (Revised February 1996). The exempt compounds content shall be determined by SCAQMD Method 303-91 (Revised 1996), BAAQMD Method 43 (Revised 2005), or BAAQMD Method 41 (Revised 2005), as applicable. To determine the VOC content of a coating or colorant, the manufacturer may use EPA Method 24, or an alternative method as provided in Section 6.3.4, formulation data, or any other reasonable means for predicting that the coating or colorant has been formulated as intended (e.g., quality assurance checks, recordkeeping). However, if there are any inconsistencies between the results of EPA Method 24 test and any other means for determining VOC content, the EPA Method 24 test results will govern, except when an alternative method is approved as specified in Section 6.3.4. The District Air Pollution Control Officer (APCO) may require</p>	<p>consistent with definitions and rule requirements presented in 2020 California Air Resources Board (ARB) Suggested Control Measures (SCM) for Architectural Coatings. Therefore, the non-SIP version of the rule is more stringent than the SIP version of the rule.</p>

Requirement Category	SIP Version of Rule 4601 (12/17/09)	Non-SIP Version of Rule 4601 (4/16/20)	Conclusion
	<p>of determining compliance with Section 6.3.2 4, after review and approved in writing by the staffs of the District, ARB and EPA, may also be used.</p> <p>6.3.4 Methacrylate Traffic Marking Coatings: Analysis of methacrylate multicomponent coatings used as traffic marking coatings shall be conducted according to a modification of EPA Method 24 (40 CFR 59, subpart D, Appendix A). This method has not been approved for methacrylate multicomponent coatings used for other purposes than as traffic marking coatings or for other classes of multicomponent coatings.</p> <p>6.3.5 Flame Spread Index: The flame spread index of a fire-retardant coating shall be determined by ASTM E84-07, "Standard Test Method for Surface Burning Characteristics of Building Materials" (see Section 3.0, Fire-Retardant Coating).</p> <p>6.3.6 Fire Resistance Rating: The fire resistance rating of a fire-resistive coating shall be determined by ASTM E119-07, "Standard Test Methods for Fire Tests of Building Construction Materials" (see Section 3.0, Fire-Resistive Coating).</p> <p>6.3.7 Gloss Determination: The gloss of a coating shall be determined by ASTM D523-89 (1999), "Standard Test Method for Specular Gloss" (see Section 3.0, Flat Coating, Nonflat Coating, Nonflat-High Gloss Coating and Quick-Dry Enamel).</p> <p>6.3.8 Metal Content of Coatings: The metallic content of a coating shall be determined by SCAQMD Method 318-95, Determination of Weight Percent Elemental Metal in Coatings by X-Ray Diffraction, <i>SCAQMD Laboratory Methods of Analysis for Enforcement Samples</i> (see Section 3.0, Metallic Pigmented Coating, Aluminum Roof Coating and Faux Finish).</p> <p>6.3.9 Acid Content of Coatings: The acid content of a coating shall be determined by ASTM D1613-06, "Standard Test Method for Acidity in Volatile Solvents and Chemical Intermediates Used in Paint, Varnish, Lacquer and related products" (see Section 3.0, Pre-Treatment Wash Primer).</p> <p>6.3.10 Drying Times: The set-to-touch, dry-hard, dry-to-touch and dry-to-recoat times of a coating shall be determined by ASTM D1640-95, "Standard Test Methods for Drying, Curing, or Film Formation of Organic Coatings at Room Temperature" (see Section 3.0, Quick-Dry Enamel and Quick-Dry Primer, Sealer and Undercoater) The tack-free time of a quick-dry enamel coating shall be determined by the Mechanical Test Method of ASTM D1640-95. (Category</p>	<p>the manufacturer to conduct an EPA Method 24 analysis.</p> <p>6.3.3 To determine the VOC content of a coating or colorant with a VOC content of 150 g/l or less, the manufacturer may use SCAQMD Method 313, incorporated by reference in subsection 6.3.34, ASTM D6886-18, incorporated by reference in subsection 6.3.35, or any other reasonable means for predicting that the coating or colorant has been formulated as intended (e.g., quality assurance checks, record keeping).</p> <p>6.3.4 Alternative Test Methods: Other test methods demonstrated to provide results that are acceptable for purposes of determining compliance with Section 6.3.2 4, after review and approved in writing by the staffs of the District, ARB and EPA, may also be used.</p> <p>6.3.5 Methacrylate Traffic Marking Coatings: Analysis of methacrylate multicomponent coatings used as traffic marking coatings shall be conducted according to a modification of EPA Method 24 (40 CFR 59, subpart D, Appendix A). This method has not been approved for methacrylate multicomponent coatings used for other purposes than as traffic marking coatings or for other classes of multicomponent coatings.</p> <p>6.3.6 Flame Spread Index: The flame spread index of a fire-retardant coating shall be determined by ASTM E84-18B, "Standard Test Method for Surface Burning Characteristics of Building Materials" (see Section 3.0, Fire-Retardant Coating).</p> <p>6.3.7 Fire Resistance Rating: The fire resistance rating of a fire-resistive coating shall be determined by ASTM E119-18ce1, "Standard Test Methods for Fire Tests of Building Construction Materials" (see Section 3.0, Fire-Resistive Coating).</p> <p>6.3.8 Gloss Determination: The gloss of a coating shall be determined by ASTM D523-14 (2018), "Standard Test Method for Specular Gloss" (see Section 3.0, Flat Coating and Nonflat Coating).</p> <p>6.3.9 Metal Content of Coatings: The metallic content of a coating shall be determined by SCAQMD Method 318-95, Determination of Weight Percent Elemental Metal in Coatings by X-Ray Diffraction, <i>SCAQMD Laboratory Methods of Analysis for Enforcement Samples</i> (see Section 3.0, Metallic Pigmented Coating, Aluminum Roof Coating and Faux Finish).</p> <p>6.3.10 Acid Content of Coatings: The acid content of a coating shall be</p>	

Requirement Category	SIP Version of Rule 4601 (12/17/09)	Non-SIP Version of Rule 4601 (4/16/20)	Conclusion
	<p>deleted effective January 1, 2011.)</p> <p>6.3.11 Surface Chalkiness: The chalkiness of a surface shall be determined using ASTM D4214-98, "Standard Test Methods for Evaluating the Degree of Chalking of Exterior Paint Films"(see Section 3, Specialty Primer, Sealer and Undercoater). (Category deleted effective January 1, 2011.)</p> <p>6.3.12 Exempt Compounds—Siloxanes: Exempt compounds that are cyclic, branched, or linear completely methylated siloxanes, shall be analyzed as exempt compounds for compliance with Section 6 by BAAQMD Method 43, "Determination of Volatile Methylsiloxanes in Solvent-Based Coatings, Inks, and Related Materials," <i>BAAQMD Manual of Procedures</i>, Volume III, adopted 11/6/96 (see Section 3.0, Volatile Organic Compound, and Section 6.3.2).</p> <p>6.3.13 Exempt Compounds—Parachlorobenzotrifluoride (PCBTF): The exempt compound parachlorobenzotrifluoride, shall be analyzed as an exempt compound for compliance with Section 6 by BAAQMD Method 41, "Determination of Volatile Organic Compounds in Solvent Based Coatings and Related Materials Containing Parachlorobenzotrifluoride," <i>BAAQMD Manual of Procedures</i>, Volume III, adopted 12/20/95 (see Section 3.0, Volatile Organic Compound, and Section 6.3.2).</p> <p>6.3.14 Exempt Compounds: The content of compounds under U.S. EPA Method 24 shall be analyzed by SCAQMD Method 303-91 (Revised 1993), "Determination of Exempt Compounds," <i>SCAQMD Laboratory Methods of Analysis for Enforcement Samples</i> (see Section 3.0, Volatile Organic Compound, and Section 6.3.2).</p> <p>6.3.15 VOC Content of Coatings: The VOC content of a coating shall be determined by EPA Method 24 as it exists in appendix A of 40 <i>Code of Federal Regulations</i> (CFR) part 60, "Determination of Volatile Matter Content, Water Content, Density, Volume Solids and Weight Solids of Surface Coatings" (see Section 6.3.2).</p> <p>6.3.16 Alternative VOC Content of Coatings: <i>The VOC content of coatings may be analyzed either by U.S. EPA Method 24 or SCAQMD Method 304-91 (Revised 1996), "Determination of Volatile Organic Compounds (VOC) in Various Materials," SCAQMD Laboratory Methods of Analysis for Enforcement Samples.</i></p> <p>6.3.17 Methacrylate Traffic Marking Coatings: The VOC content of methacrylate multicomponent coatings used as traffic marking coatings shall be</p>	<p>determined by ASTM D1613-17, "Standard Test Method for Acidity in Volatile Solvents and Chemical Intermediates Used in Paint, Varnish, Lacquer and related products" (see Section 3.0, Pre-Treatment Wash Primer).</p> <p>6.3.11 Exempt Compounds—Siloxanes: Exempt compounds that are cyclic, branched, or linear completely methylated siloxanes, shall be analyzed as exempt compounds for compliance with Section 6 by BAAQMD Method 43, "Determination of Volatile Methylsiloxanes in Solvent-Based Coatings, Inks, and Related Materials," <i>BAAQMD Manual of Procedures</i>, Volume III, revised 2006 (see Section 3.0, Volatile Organic Compound, and Section 6.3.2).</p> <p>6.3.12 Exempt Compounds—Parachlorobenzotrifluoride (PCBTF): The exempt compound parachlorobenzotrifluoride, shall be analyzed as an exempt compound for compliance with Section 6 by BAAQMD Method 41, "Determination of Volatile Organic Compounds in Solvent Based Coatings and Related Materials Containing Parachlorobenzotrifluoride," <i>BAAQMD Manual of Procedures</i>, Volume III, revised 2006 (see Section 3.0, Volatile Organic Compound, and Section 6.3.2).</p> <p>6.3.13 Exempt Compounds: The content of compounds exempted under U.S. EPA Method 24 shall be analyzed by SCAQMD Method 303-91 (Revised 1996), "Determination of Exempt Compounds," <i>SCAQMD Laboratory Methods of Analysis for Enforcement Samples</i> (see Section 3.0, Volatile Organic Compound, and Section 6.3.2).</p> <p>6.3.14 VOC Content of Coatings: The VOC content of a coating shall be determined by EPA Method 24 as it exists in appendix A of 40 <i>Code of Federal Regulations</i> (CFR) part 60, "Determination of Volatile Matter Content, Water Content, Density, Volume Solids and Weight Solids of Surface Coatings" (see Section 6.3.2).</p> <p>6.3.15 Alternative VOC Content of Coatings: The VOC content of coatings may be analyzed either by U.S. EPA Method 24 or SCAQMD Method 304-91 (Revised 1996), "Determination of Volatile Organic Compounds (VOC) in Various Materials," <i>SCAQMD Laboratory Methods of Analysis for Enforcement Samples.</i></p> <p>6.3.16 Methacrylate Traffic Marking Coatings: The VOC content of</p>	

Requirement Category	SIP Version of Rule 4601 (12/17/09)	Non-SIP Version of Rule 4601 (4/16/20)	Conclusion
	<p>analyzed by the procedures in 40 CFR part 59, subpart D, appendix A, "Determination of Volatile Matter Content of Methacrylate Multicomponent Coatings Used as Traffic Marking Coatings" (September 11, 1998).</p> <p>6.3.18 Hydrostatic Pressure for Basement Specialty Coatings: The hydrostatic pressure resistance for basement specialty coatings shall be analyzed using ASTM D7088-04, "Standard Practice for Resistance to Hydrostatic Pressure for Coatings Used in Below Grade Applications Applied to Masonry".</p> <p>6.3.19 Tub and Tile Refinish Coating Adhesion: The adhesion of tub and tile coating shall be determined by ASTM D4585-99, "Standard Practice for Testing Water Resistance of Coatings Using Controlled Condensation" and ASTM D3359-02, "Standard Test Methods for Measuring Adhesion by Tape Test".</p> <p>6.3.20 Tub and Tile Refinish Coating Hardness: The hardness of tub and tile refinish coating shall be determined by ASTM D3363-05, "Standard Test Method for Film Hardness by Pencil Test".</p> <p>6.3.21 Tub and Tile Refinish Coating Abrasion Resistance: Abrasion resistance of tub and tile refinish coating shall be analyzed by ASTM D4060-07, "Standard Test Methods for Abrasion Resistance of Organic Coatings by the Taber Abraser".</p> <p>6.3.22 Tub and Tile Refinish Coating Water Resistance: Water resistance of tub and tile refinish coatings shall be determined by ASTM D4585-99, "Standard Practice for Testing Water Resistance of Coatings Using Controlled Condensation" and ASTM D714-02e1, "Standard Test Method for Evaluating Degree of Blistering of Paints".</p> <p>6.3.23 Waterproofing Membrane: Waterproofing membrane shall be tested by ASTM C836-06, "Standard Specification for High Solids Content, Cold Liquid-Applied Elastomeric Waterproofing Membrane for Use with Separate Wearing Course".</p> <p>6.3.24 Mold and Mildew Growth for Basement Specialty Coatings: Mold and mildew growth resistance for basement specialty coatings shall be determined by ASTM D3273-00, "Standard Test Method for Resistance to Growth of Mold on the Surface of Interior Coatings in an Environmental Chamber" and ASTM D3274-95, "Standard Test Method for Evaluating Degree of Surface Disfigurement of Paint Films by Microbial (Fungal or Algal) Growth or Soil and Dirt Accumulation".</p>	<p>methacrylate multicomponent coatings used as traffic marking coatings shall be analyzed by the procedures in 40 CFR part 59, subpart D, appendix A, "Determination of Volatile Matter Content of Methacrylate Multicomponent Coatings Used as Traffic Marking Coatings" (September 11, 1998).</p> <p>6.3.17 Hydrostatic Pressure for Basement Specialty Coatings: The hydrostatic pressure resistance for basement specialty coatings shall be analyzed using ASTM D7088-17, "Standard Practice for Resistance to Hydrostatic Pressure for Coatings Used in Below Grade Applications Applied to Masonry".</p> <p>6.3.18 Tub and Tile Refinish Coating Adhesion: The adhesion of tub and tile coating shall be determined by ASTM D4585/4585M-18, "Standard Practice for Testing Water Resistance of Coatings Using Controlled Condensation" and ASTM D3359-17, "Standard Test Methods for Measuring Adhesion by Tape Test".</p> <p>6.3.19 Tub and Tile Refinish Coating Hardness: The hardness of tub and tile refinish coating shall be determined by ASTM D3363-05 (2011)e2, "Standard Test Method for Film Hardness by Pencil Test".</p> <p>6.3.20 Tub and Tile Refinish Coating Abrasion Resistance: Abrasion resistance of tub and tile refinish coating shall be analyzed by ASTM D4060-14, "Standard Test Methods for Abrasion Resistance of Organic Coatings by the Taber Abraser".</p> <p>6.3.21 Tub and Tile Refinish Coating Water Resistance: Water resistance of tub and tile refinish coatings shall be determined by ASTM D4585/4585M-18, "Standard Practice for Testing Water Resistance of Coatings Using Controlled Condensation" and ASTM D714-02 (2017), "Standard Test Method for Evaluating Degree of Blistering of Paints".</p> <p>6.3.22 Waterproofing Membrane: Waterproofing membrane shall be ASTM C836/836M-18, "Standard Specification for High Solids Content, Cold Liquid-Applied Elastomeric Waterproofing Membrane for Use with Separate Wearing Course".</p> <p>6.3.23 Mold and Mildew Growth for Basement Specialty Coatings: Mold and mildew growth resistance for basement specialty coatings shall be determined by ASTM D3273-16, "Standard Test Method for Resistance to Growth of Mold on the Surface of Interior Coatings in an</p>	

Requirement Category	SIP Version of Rule 4601 (12/17/09)	Non-SIP Version of Rule 4601 (4/16/20)	Conclusion
	<p>6.3.25 Reactive Penetrating Sealer Water Repellency: Reactive penetrating sealer water repellency shall be analyzed by ASTM C67-07, "Standard Test Methods for Sampling and Testing Brick and Structural Clay Tile"; or ASTM C97-02, "Standard Test Methods for Absorption and Bulk Specific Gravity of Dimension Stone"; or ASTM C140-06, "Standard Test Methods for Sampling and Testing Concrete Masonry Units and Related Units".</p> <p>6.3.26 Reactive Penetrating Sealer Water Vapor Transmission: Reactive penetrating sealer water vapor transmission shall be analyzed ASTM E96/E96M-05, "Standard Test Method for Water Vapor Transmission of Materials".</p> <p>6.3.27 Reactive Penetrating Sealer - Chloride Screening Applications: Reactive penetrating sealers shall be analyzed by National Cooperative Highway Research Report 244 (1981), "Concrete Sealers for the Protection of Bridge Structures".</p> <p>6.3.28 Stone Consolidants: Stone consolidants shall be tested using ASTM E2167-01, "Standard Guide for Selection and Use of Stone Consolidants".</p>	<p>Environmental Chamber" and ASTM D3274-09 (2017), "Standard Test Method for Evaluating Degree of Surface Disfigurement of Paint Films by Fungal or Algal Growth or Soil and Dirt Accumulation". 6.3.25 Reactive Penetrating Sealer Water Repellency: Reactive penetrating sealer water repellency shall be analyzed by ASTM C67-07, "Standard Test Methods for Sampling and Testing Brick and Structural Clay Tile"; or ASTM C97-02, "Standard Test Methods for Absorption and Bulk Specific Gravity of Dimension Stone"; or ASTM C140-06, "Standard Test Methods for Sampling and Testing Concrete Masonry Units and Related Units".</p> <p>6.3.24 Reactive Penetrating Sealer Water Repellency: Reactive penetrating sealer water repellency shall be analyzed by ASTM C67/C67M-18, "Standard Test Methods for Sampling and Testing Brick and Structural Clay Tile"; or ASTM C97/97M-18, "Standard Test Methods for Absorption and Bulk Specific Gravity of Dimension Stone"; or ASTM C140-140M-18a, "Standard Test Methods for Sampling and Testing Concrete Masonry Units and Related Units"</p> <p>6.3.25 Reactive Penetrating Sealer Water Vapor Transmission: Reactive penetrating sealer water vapor transmission shall be analyzed ASTM E96/E96M-16, "Standard Test Method for Water Vapor Transmission of Materials" or ASTM D6490-99 (2014), "Standard Test Method for Water Vapor Transmission of Nonfilm Forming Treatments Used on Cementitious Panels".</p> <p>6.3.26 Reactive Penetrating Sealer - Chloride Screening Applications: Reactive penetrating sealers shall be analyzed by National Cooperative Highway Research Report 244 (1981), "Concrete Sealers for the Protection of Bridge Structures".</p> <p>6.3.27 Stone Consolidants: Stone consolidants shall be tested using ASTM E2167-01 (2008), "Standard Guide for Selection and Use of Stone Consolidants".</p> <p>6.3.28 Building Envelope Coating Air Permeance of Building Materials: ASTM E2178-13, "Standard Test Method for Air Permeance of Building Materials".</p> <p>6.3.29 Building Envelope Coating Water Penetration Testing: ASTM E331-00 (2016), "Standard Test Method for Water Penetration of Exterior Windows, Skylights, Doors, and Curtain Walls by Uniform Static Air</p>	

Requirement Category	SIP Version of Rule 4601 (12/17/09)	Non-SIP Version of Rule 4601 (4/16/20)	Conclusion
		<p>Pressure Difference”.</p> <p>6.3.30 Building Envelope Coating Water Vapor Transmission: ASTM E96/96M-16, “Standard Test Methods for Water Vapor Transmission of Materials”.</p> <p>6.3.31 Tile and Stone Sealers Absorption: ASTM C373-18, “Standard Test Methods for Determination of Water Absorption and Associated Properties by Vacuum Method for Pressed Ceramic Tile and Glass Tiles and Boil Method for Extruded Ceramic Tiles and Non-tile Fired Ceramic Whiteware Products”; or ASTM C97/97M-18, “Standard Test Methods for Absorption and Bulk Specific Gravity of Dimension Stone”; or ASTM C642-13, “Standard Test Method for Density, Absorption, and Voids in Hardened Concrete”.</p> <p>6.3.32 Tile and Stone Sealers – Static Coefficient of Friction: ANSI A137.1 (2012), “American National Standard of Specifications for Ceramic Tile”.</p> <p>6.3.33 Tile and Stone Sealers Water Vapor Transmissions: ASTM E96/96M-16, “Standard Test Methods for Water Vapor Transmission of Materials”.</p> <p>6.3.34 VOC Content of Coatings: South Coast AQMD Method 313, “Determination of Volatile Organic Compounds (VOC) by Gas Chromatography/Mass Spectrometry/Flame Ionization Detection (GS/MS/FID)”.</p> <p>6.3.35 VOC Content of Coatings: ASTM D6886-18, “Standard Test Method for Determination of the Weight Percent Individual Volatile Organic Compounds in Waterborne Air-Dry Coatings by Gas Chromatography”.</p>	
7.0 Compliance Schedule	Persons subject to this rule shall be in compliance with this rule by the dates specified within the rule.	Persons subject to this rule shall be in compliance with this rule by the dates specified within the rule.	No change in the requirements, therefore, non-SIP version of rule is as stringent as SIP version.

District Rule 4601 was amended (4/16/20). As analyzed, each amended section of the non-SIP version of the rule is at least as stringent as, or more stringent than the corresponding section of the SIP version of the rule. Therefore, it is concluded that overall the non-SIP version of the rule is more stringent than the SIP version of the rule.

Here is the link to 2020 California Air Resources Board (ARB) Suggested Control Measures (SCM) for Architectural Coatings:

https://ww2.arb.ca.gov/sites/default/files/2020-07/2020SCM_final.pdf

Table 1 VOC Content Limits for Coatings

COATING CATEGORY	Current Rule 4601 VOC Limit (g/l) Effective on and after 1/1/2012	Amended Rule 4601 VOC Limit (g/l) Effective on and after 1/1/2022
Flat Coatings	50	50
Nonflat Coatings	100	50
Specialty Coatings -		
Aluminum Roof Coatings	400	100
Basement Specialty Coatings	400	400
Bituminous Roof Coatings	50	50
Bituminous Roof Primers	350	350
Bond Breakers	350	350
Building Envelope Coatings	-	50
Concrete Curing Compounds	350	350
Concrete/Masonry Sealers	100	100
Driveway Sealers	50	50
Dry Fog Coatings	150	50
Faux Finishing Coatings	350	350
Fire Resistive Coatings	350	150
Floor Coatings	100	50
Form-Release Compounds	250	100
Graphic Arts Coatings (Sign Paints)	500	500
High Temperature Coatings	420	420
Industrial Maintenance Coatings	250	250
Low Solids Coatings ¹²	120 ¹	120 ¹
Magnesite Cement Coatings	450	450
Mastic Texture Coatings	100	100
Metallic Pigmented Coatings	500	500
Multi-Color Coatings	250	250
Pre-Treatment Wash Primers	420	420
Primers, Sealers, and Undercoaters	100	100
Reactive Penetrating Sealers	350	350
Recycled Coatings	250	250
Roof Coatings	50	50
Rust Preventative Coatings	250	250
Shellacs:		
Clear	730	730
Opaque	550	550
Specialty Primers, Sealers, and Undercoaters	100	100
Stains	250	100
Interior Stains	250	
Stone Consolidants	450	450
Swimming Pool Coatings	340	340
Tile and Stone Sealers	100	
Traffic Marking Coatings	100	100
Tub and Tile Refinish Coatings	420	420
Waterproofing Membranes	250	100
Wood Coatings	275	275
Wood Preservatives	350	350
Zinc-Rich Primers	340	340

Table 2 VOC Content Limits for Colorants

Colorants Added To	VOC Limit (g/l) Effective on and after 1/1/2022
Architectural Coatings, excluding Industrial Maintenance Coatings	50
Solvent Based Industrial Maintenance Coatings	600
Waterborne Industrial Maintenance Coatings	50
Wood Coatings	600