JAN 30 2013

Richard Sanchez
Label Technology, Inc.
2050 Wardrobe Avenue
Merced, CA 95341

Re: Notice of Preliminary Decision - Federally Mandated Operating Permit District Facility # N-3852 Project # N-1113134

Dear Mr. Sanchez:

Enclosed for your review and comment is the District's analysis of Label Technology Incorporated's application for the Federally Mandated Operating Permit for its graphic arts operation at 2050 Wardrobe Avenue in Merced, California.

The notice of preliminary decision for this project will be published approximately three days from the date of this letter. Please submit your written comments on this project within the 30-day comment period which begins on the date of publication of the public notice.

Thank you for your cooperation in this matter. If you have any questions regarding this matter, please contact Mr. Rupi Gill, Permit Services Manager, at (209) 557-6400.

Sincerely,

David Warner
Director of Permit Services

DW:MS/st

Enclosures
JAN 3 2013

Gerardo C. Rios, Chief
Permits Office (AIR-3)
U.S. EPA - Region IX
75 Hawthorne St
San Francisco, CA 94105

Re: Notice of Preliminary Decision - Federally Mandated Operating Permit
District Facility # N-3852
Project # N-1113134

Dear Mr. Rios:

Enclosed for your review and comment is the District's analysis of Label Technology Incorporated's application for the Federally Mandated Operating Permit for its graphic arts operation at 2050 Wardrobe Avenue in Merced, California.

The notice of preliminary decision for this project will be published approximately three days from the date of this letter. Please submit your written comments on this project within the 45-day comment period which begins on the date of publication of the public notice.

Thank you for your cooperation in this matter. If you have any questions regarding this matter, please contact Mr. Rupi Gill, Permit Services Manager, at (209) 557-6400.

Sincerely,

[Signature]

David Warner
Director of Permit Services

DW:MS/st

Enclosures
JAN 30 2013

Mike Tollstrup, Chief
Project Assessment Branch
Air Resources Board
P O Box 2815
Sacramento, CA 95812-2815

Re: Notice of Preliminary Decision - Federally Mandated Operating Permit
   District Facility # N-3852
   Project # N-1113134

Dear Mr. Tollstrup:

Enclosed for your review and comment is the District's analysis of Label Technology
Incorporated's application for the Federally Mandated Operating Permit for its graphic
arts operation at 2050 Wardrobe Avenue in Merced, California.

The notice of preliminary decision for this project will be published approximately three
days from the date of this letter. Please submit your written comments on this project
within the 30-day comment period which begins on the date of publication of the public
notice.

Thank you for your cooperation in this matter. If you have any questions regarding this
matter, please contact Mr. Rupi Gill, Permit Services Manager, at (209) 557-6400.

Sincerely,

David Warner
Director of Permit Services

DW:MS/st

Enclosures
NOTICE OF PRELIMINARY DECISION
FOR THE PROPOSED ISSUANCE OF
FEDERALLY MANDATED OPERATING PERMITS

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Air Pollution Control District solicits public comment on the proposed issuance of the Federally Mandated Operating permits to Label Technology, Inc. for its graphic arts operation at 2050 Wardrobe Avenue in Merced, California.

The District’s analysis of the legal and factual basis for this proposed action, project #N-1113134, is available for public inspection at http://www.valleyair.org/notices/public_notices_idx.htm and the District office at the address below. There are no emission changes associated with this proposed action. This will be the public’s only opportunity to comment on the specific conditions of the proposed Federally Mandated Operating initial permits. If requested by the public, the District will hold a public hearing regarding issuance of this initial permit. For additional information, please contact Mr. Rupi Gill, Permit Services Manager, at (209) 557-6400. Written comments on the proposed initial permit must be submitted within 30 days of the publication date of this notice to DAVID WARNER, DIRECTOR OF PERMIT SERVICES, SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT, 4800 ENTERPRISE WAY, MODESTO, CALIFORNIA 95356.
San Joaquin Valley
Air Pollution Control District

Proposed Initial Title V Permit Evaluation
Label Technology
N-3852

TABLE OF CONTENTS

I. PROPOSAL
II. FACILITY LOCATION
III. EQUIPMENT LISTING
IV. GENERAL PERMIT TEMPLATE USAGE
V. SCOPE OF EPA AND PUBLIC REVIEW
VI. FEDERALLY ENFORCEABLE REQUIREMENTS
VII. REQUIREMENTS NOT FEDERALLY ENFORCEABLE
VIII. PERMIT REQUIREMENTS
IX. PERMIT SHIELDS
X. PERMIT CONDITIONS
XI. ATTACHMENTS

A. DRAFT INITIAL TITLE V OPERATING PERMIT
B. DETAILED FACILITY LIST
INITIAL TITLE V PERMIT EVALUATION
GRAPHIC ARTS FACILITY

Engineer: Mark Schonhoff
Date: January 23, 2013

Facility Number: N-3852
Facility Name: Label Technology
Mailing Address: 2050 Wardrobe Avenue
Merced, CA 95341

Contact Name: Richard Sanchez
Telephone: (209) 384-1000

Responsible Official: Vinton Thergvall
Title: CFO

Project Number: N-1113134
Deemed Complete: November 15, 2011

I. PROPOSAL

As required by District Rule 2520, Label Technology has applied for a Title V operating permit. The existing permit will be reviewed and modified to reflect all applicable District and Federal rules.

The purpose of this evaluation is to provide the legal and factual basis for all applicable requirements and to determine if the facility will comply with these requirements.

II. FACILITY LOCATION

2050 Wardrobe Avenue
Merced, CA

III. EQUIPMENT LISTING

N-3852-1-5

GRAPHIC ARTS PRINTING OPERATION CONSISTING OF A ROTOPRESS
MODEL 2002 10 INCH 8-COLOR FLEXOGRAPHIC PRINTING PRESS
N-3852-2-5

GRAPHIC ARTS PRINTING OPERATION CONSISTING OF A ROTOPRESS
MODEL 4002 10 INCH 4-COLOR FLEXOGRAPHIC PRINTING PRESS

N-3852-9-3

GRAPHIC ARTS PRINTING OPERATION CONSISTING OF A ROTOPRESS 10
INCH 8-COLOR FLEXOGRAPHIC PRESS

N-3852-13-2

GRAPHIC ARTS PRINTING OPERATION CONSISTING OF A MARK ANDY
MODEL 4150 9-COLOR FLEXOGRAPHIC PRINTING PRESS (PRESS IS
EQUIPPED WITH PERMIT EXEMPT ELECTRICAL DRYERS)

N-3852-14-2

GRAPHIC ARTS PRINTING OPERATION CONSISTING OF A ROTOPRESS
MODEL 3516 9-COLOR FLEXOGRAPHIC PRINTING PRESS

N-3852-15-1

GRAPHIC ARTS PRINTING OPERATION CONSISTING OF A PCMC
"EVOLUTION" 26 INCH 9-COLOR FLEXOGRAPHIC PRINTING AND DIE
CUTTING PRESS

N-3852-16-2

GRAPHIC ARTS PRINTING OPERATION CONSISTING OF A MARK ANDY
MODEL LP3430-17 10-COLOR FLEXOGRAPHIC PRINTING AND DIE
CUTTING PRESS

N-3852-17-1

GRAPHIC ARTS OPERATION CONSISTING OF A DRI-TEC 30 INCH
LAMINATOR. THE LAMINATOR IS EQUIPPED WITH A PERMIT EXEMPT
NATURAL GAS FIRED DRYER (RULE 2020 SECTION 6.B.1).

N-3852-18-1

GRAPHIC ARTS PRINTING OPERATION CONSISTING OF A MARK ANDY
MODEL XP5000-20 10-COLOR FLEXOGRAPHIC LABEL AND TAG PRINTING
AND DIE CUTTING PRESS WITH TEN 7.5 KW DRYERS
IV. GENERAL PERMIT TEMPLATE USAGE

The applicant is requesting the use of the following model general permit template:

A. Template SJV-UM-0-3 Facility Wide Umbrella

The applicant has requested the utilization of template number 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 operating permit are based on model general permit templates that have been previously subjected 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 the 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 N-3852-0-1.
VI. FEDERALLY ENFORCEABLE REQUIREMENTS

District Rule 2201, New and Modified Stationary Source Review Rule
(last amended April 21, 2011)

District Rule 2520, Federally Mandated Operating Permits
(last amended June 21, 2001)

District Rule 4131, Visible Emissions
(last amended February 17, 2005)

District Rule 4351, Boilers, Steam Generators and Process heaters – Phase 1
(last amended August 21, 2003)

District Rule 4305, Boilers, Steam Generators and Process heaters – Phase 2
(last amended August 21, 2003)

District Rule 4306, Boilers, Steam Generators and Process heaters – Phase 3
(last amended October 16, 2008)

District Rule 4320, Advanced Emission Reduction Options for Boilers, Steam Generators and Process Heaters Greater than 5.0 MMBtu/hr
(last amended October 16, 2008)

District Rule 4308, Boilers, Steam Generators and Process Heaters – 0.075 MMBtu/hr to less than 2.0 MMBtu/hr
(last amended December 17, 2009)

District Rule 4309, Dryers, Dehydrators and Ovens
(last amended December 15, 2005)

District Rule 4607, Graphic Arts and Paper, Film, Foil and Fabric Coatings
(last amended December 18, 2008)

District Rule 4653, Adhesives and Sealants
(last amended September 16, 2010)

District Rule 4661, Organic Solvents
(last amended September 20, 2007)

District Rule 4801, Sulfur Compounds
(last amended December 17, 1992)
40 CFR Part 60 Subpart QQ, Standards of Performance for the Graphic Arts Industry: Publication Rotogravure Printing

40 CFR Part 63, Subpart KK, National Emission Standards for the Printing and Publishing Industry


40 CFR Part 64, Compliance Assurance Monitoring (CAM)

VII. RULES NOT FEDERALLY ENFORCEABLE

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

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

VIII. Permit Requirements

This section includes the Federally enforceable requirements. Clarification of equipment descriptions and the correction of typographical errors that do not change the meaning of an equipment description or condition will be made but not be discussed.

District Rule 2201, New and Modified Stationary Source Review Rule (last amended April 21, 2011)

The permit units listed on the following table were subject to a District NSR Rule upon application for Authority to Construct (ATC). In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

<table>
<thead>
<tr>
<th>New Title V Permit Number</th>
<th>Condition Numbers</th>
</tr>
</thead>
<tbody>
<tr>
<td>N-3852-1-5</td>
<td>2, 3, 15, 22, 24</td>
</tr>
<tr>
<td>N-3852-2-5</td>
<td>2, 3, 15, 22, 24</td>
</tr>
<tr>
<td>N-3852-9-3</td>
<td>2, 3, 15, 22, 24</td>
</tr>
<tr>
<td>N-3852-13-2</td>
<td>2, 3, 15, 22, 24</td>
</tr>
<tr>
<td>N-3852-14-2</td>
<td>2, 3, 5, 6, 16, 23, 25</td>
</tr>
<tr>
<td>N-3852-15-1</td>
<td>2, 3, 5, 6, 16, 23, 24, 26</td>
</tr>
<tr>
<td>N-3852-15-2</td>
<td>2, 3, 5, 6, 16, 23, 24, 26</td>
</tr>
<tr>
<td>N-3852-17-1</td>
<td>2, 3, 15, 22, 24</td>
</tr>
<tr>
<td>N-3852-18-1</td>
<td>2, 3, 5, 6, 16, 23, 25</td>
</tr>
<tr>
<td>N-3952-19-1</td>
<td>2, 3, 4, 6, 7, 8, 9, 12, 14</td>
</tr>
<tr>
<td>N-3852-20-1</td>
<td>2, 3, 5, 6, 16, 23, 24, 26</td>
</tr>
</tbody>
</table>
District Rule 2520, Federally Mandated Operating Permits
(last amended June 21, 2001)

General Umbrella Template SJV-UM-0-3 addresses this rule, therefore, no discussion is required.

Greenhouse Gas Discussion

There are no federally applicable Greenhouse Gas (GHG) requirements for this source. It should be noted that the Mandatory Greenhouse Gas Reporting rule (40 CFR Part 98) is not included in the definition of an applicable requirement within Title V (per 40 CFR 71.2). Therefore, there will be no further discussion of GHG in this evaluation.

District Rule 4351, Boilers, Steam Generators and Process heaters – Phase 1
(last amended August 21, 2003)

District Rule 4305, Boilers, Steam Generators and Process heaters – Phase 2
(last amended August 21, 2003)

District Rule 4306, Boilers, Steam Generators and Process heaters – Phase 3
(last amended October 16, 2008)

District Rule 4320, Advanced Emission Reduction Options for Boilers, Steam Generators and Process Heaters Greater than 5.0 MMBtu/hr
(last amended October 16, 2008)

Permit unit N-3852-17 includes a permit exempt 0.8 MMBtu/hr natural gas fired tunnel drier. These rules apply only to units rated at more than 5.0 MMBtu/hr, therefore, they do not apply.

District Rule 4308, Boilers, Steam Generators and Process Heaters – 0.075 MMBtu/hr to less than 2.0 MMBtu/hr
(last amended December 17, 2009)

Permit unit N-3852-17 includes a permit exempt 0.8 MMBtu/hr tunnel drier (process heater). This rule applies only to the installation of units installed after its adoption (October 20, 2005). The Authority-to-Construct application that proposed the installation of this unit was deemed complete by the District on September 25, 2005 (this is the date that the District establishes applicable requirements). Therefore, the process heater is not subject to this rule.
District Rule 4309, **Dryers, Dehydrators and Ovens**
(last amended December 15, 2005)

Permit unit N-3852-17 includes a permit exempt 0.8 MMBtu/hr natural gas fired tunnel drier. This rule applies only to units rated at more than 5.0 MMBtu/hr, therefore, it does not apply.
**District Rule 4607, Graphic Arts and Paper, Film, Foil and Fabric Coatings**
(last amended December 18, 2008)

<table>
<thead>
<tr>
<th>New Title V Permit Number</th>
<th>Condition #</th>
<th>Requirement</th>
<th>Basis</th>
</tr>
</thead>
<tbody>
<tr>
<td>N-3852-1-5</td>
<td>5</td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-3852-2-5</td>
<td>5</td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-3852-9-3</td>
<td>5</td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-3852-13-2</td>
<td>5</td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-3852-14-2</td>
<td>6, 7</td>
<td>VOC content limits (non-specialty inks, adhesives and coatings)</td>
<td>Sect 5.1</td>
</tr>
<tr>
<td>N-3852-15-1</td>
<td>6, 7</td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-3852-16-2</td>
<td>6, 7</td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-3852-17-1</td>
<td>5</td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-3852-18-1</td>
<td>6, 7</td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-3852-20-1</td>
<td>6, 7</td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-3852-1-5</td>
<td>6</td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-3852-2-5</td>
<td>6</td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-3852-9-3</td>
<td>6</td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-3852-13-2</td>
<td>6</td>
<td>VOC content limits (specialty inks)</td>
<td>Sect 5.2.1</td>
</tr>
<tr>
<td>N-3852-14-2</td>
<td>6</td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-3852-15-1</td>
<td>6</td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-3852-16-2</td>
<td>6</td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-3852-17-1</td>
<td>6</td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-3852-18-1</td>
<td>6</td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-3852-20-1</td>
<td>6</td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-3852-1-5</td>
<td>7</td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-3852-2-5</td>
<td>7</td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-3852-9-3</td>
<td>7</td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-3852-13-2</td>
<td>7</td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-3852-14-2</td>
<td>8</td>
<td>Specialty ink use rate</td>
<td>Sect 5.2.1</td>
</tr>
<tr>
<td>N-3852-15-1</td>
<td>8</td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-3852-16-2</td>
<td>8</td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-3852-17-1</td>
<td>7</td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-3852-18-1</td>
<td>8</td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-3852-20-1</td>
<td>8</td>
<td></td>
<td></td>
</tr>
<tr>
<td>N/A</td>
<td>N/A</td>
<td>VOC content limits (paper, film, foil or fabric coating operations)</td>
<td>Sect 5.5 – note 1</td>
</tr>
</tbody>
</table>

**Note 1:** The coatings applied are applied in association with printing operations. Therefore, the operations are Graphic Arts Printing Operations subject to section 5.1 (they are not paper, film, foil or fabric coating operations subject to section 5.5).
### District Rule 4607, Graphic Arts and Paper, Film, Foil and Fabric Coatings - continued
(last amended December 18, 2008)

<table>
<thead>
<tr>
<th>New Title V Permit Number</th>
<th>Condition #</th>
<th>Requirement</th>
<th>Basis</th>
</tr>
</thead>
<tbody>
<tr>
<td>N-3852-1-5</td>
<td>15</td>
<td>Coating application equipment</td>
<td>Sect 5.7 – note 2</td>
</tr>
<tr>
<td>N-3852-2-5</td>
<td>15</td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-3852-9-3</td>
<td>15</td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-3852-13-2</td>
<td>15</td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-3852-14-2</td>
<td>16</td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-3852-15-1</td>
<td>16</td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-3852-16-2</td>
<td>16</td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-3852-17-1</td>
<td>15</td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-3852-18-1</td>
<td>16</td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-3852-20-1</td>
<td>16</td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-3852-1-5</td>
<td>8</td>
<td>VOC content limits (solvents)</td>
<td>Sect 5.8.1 (table 7)</td>
</tr>
<tr>
<td>N-3852-2-5</td>
<td>8</td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-3852-9-3</td>
<td>8</td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-3852-13-2</td>
<td>8</td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-3852-14-2</td>
<td>9</td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-3852-15-1</td>
<td>9</td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-3852-16-2</td>
<td>9</td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-3852-17-1</td>
<td>8</td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-3852-18-1</td>
<td>9</td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-3852-20-1</td>
<td>9</td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-3852-1-5</td>
<td>9</td>
<td>Solvent cleaning methods</td>
<td></td>
</tr>
<tr>
<td>N-3852-2-5</td>
<td>9</td>
<td>Specialty flexographic</td>
<td>Sect 5.8.2, 5.8.3</td>
</tr>
<tr>
<td>N-3852-9-3</td>
<td>9</td>
<td>Solvent atomization restriction</td>
<td>Sect 5.8.4</td>
</tr>
<tr>
<td>N-3852-13-2</td>
<td>10</td>
<td>Solvent cleaning methods</td>
<td></td>
</tr>
<tr>
<td>N-3852-17-1</td>
<td>10</td>
<td>Specialty flexographic</td>
<td>Sect 5.8.2, 5.8.3</td>
</tr>
<tr>
<td>N-3852-18-1</td>
<td>10</td>
<td>Solvent atomization restriction</td>
<td>Sect 5.8.4</td>
</tr>
<tr>
<td>N-3852-20-1</td>
<td>11</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Note 2:** Section 5.7 of this rule allows several coating application methods. However, since the permits do not allow particulate matter emissions, the spray methods allowed by section 5.7 of the rule will not be allowed by the permits.
### District Rule 4607, Graphic Arts and Paper, Film, Foil and Fabric Coatings - continued
(last amended December 18, 2008)

<table>
<thead>
<tr>
<th>New Title V Permit Number</th>
<th>Condition #</th>
<th>Requirement</th>
<th>Basis</th>
</tr>
</thead>
<tbody>
<tr>
<td>N-3852-1-5</td>
<td>11</td>
<td>Organic solvent storage and disposal</td>
<td>Sect 5.9</td>
</tr>
<tr>
<td>N-3852-2-5</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-3852-9-3</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-3852-13-2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-3852-17-1</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-3852-14-2</td>
<td>12</td>
<td>Organic solvent storage and disposal</td>
<td>Sect 5.9</td>
</tr>
<tr>
<td>N-3852-15-1</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-3852-16-2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-3852-18-1</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-3852-20-1</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-3852-1-5</td>
<td>16</td>
<td>Work practices</td>
<td>5.10</td>
</tr>
<tr>
<td>N-3852-2-5</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-3852-9-3</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-3852-13-2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-3852-17-1</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-3852-14-2</td>
<td>17</td>
<td>Work practices</td>
<td>5.10</td>
</tr>
<tr>
<td>N-3852-15-1</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-3852-16-2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-3852-18-1</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-3852-20-1</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Continued – Next Page
<table>
<thead>
<tr>
<th>New Title V Permit Number</th>
<th>Condition #</th>
<th>Requirement</th>
<th>Basis</th>
</tr>
</thead>
<tbody>
<tr>
<td>N-3852-1-5</td>
<td>24</td>
<td>Record keeping</td>
<td>Sect 6.1</td>
</tr>
<tr>
<td>N-3852-2-5</td>
<td>17</td>
<td>Record retention</td>
<td>Sect 6.1.1</td>
</tr>
<tr>
<td>N-3852-9-3</td>
<td>18</td>
<td>Material list</td>
<td>Sect 6.1.2.1</td>
</tr>
<tr>
<td>N-3852-13-2</td>
<td>19</td>
<td>Monthly ink use records</td>
<td>Sect 6.1.2.2</td>
</tr>
<tr>
<td>N-3852-17-1</td>
<td>20</td>
<td>Monthly coating adhesive, wash primer and solvent usage</td>
<td>Sect 6.1.2.3</td>
</tr>
<tr>
<td></td>
<td>N/A</td>
<td>Daily non-compliant material usage</td>
<td>Sect 6.1.3 – note 3</td>
</tr>
<tr>
<td></td>
<td>21</td>
<td>Daily specialty flexographic ink usage</td>
<td>Sect 6.1.4</td>
</tr>
<tr>
<td>N-3852-14-2</td>
<td>18</td>
<td>Material list</td>
<td>Sect 6.1.1</td>
</tr>
<tr>
<td>N-3852-15-1</td>
<td>19</td>
<td>Monthly ink use records</td>
<td>Sect 6.1.2.1</td>
</tr>
<tr>
<td>N-3852-16-2</td>
<td>20</td>
<td>Monthly coating adhesive, wash primer and solvent usage</td>
<td>Sect 6.1.2.2</td>
</tr>
<tr>
<td>N-3852-18-1</td>
<td>21</td>
<td>Monthly fountain solution usage</td>
<td>Sect 6.1.2.3</td>
</tr>
<tr>
<td></td>
<td>N/A</td>
<td>Daily non-compliant material usage</td>
<td>Sect 6.1.3 – note 3</td>
</tr>
<tr>
<td></td>
<td>22</td>
<td>Daily specialty flexographic ink usage</td>
<td>Sect 6.1.4</td>
</tr>
</tbody>
</table>

Note 3: Non-compliant materials are not used.
<table>
<thead>
<tr>
<th>New Title V Permit Number</th>
<th>Condition #</th>
<th>Requirement</th>
<th>Basis</th>
</tr>
</thead>
<tbody>
<tr>
<td>N-3852-14-1 N-3852-18-1</td>
<td>25</td>
<td>Record keeping</td>
<td>Sect 6.1</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Record retention</td>
<td></td>
</tr>
<tr>
<td>N-3852-15-1 N-3852-16-2 N-3852-20-1</td>
<td>26</td>
<td>Record keeping</td>
<td>Sect 6.1</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Record retention</td>
<td></td>
</tr>
</tbody>
</table>
District Rule 4653, Adhesives and Sealants
(last amended September 16, 2010)

This rule applies to the application of adhesives, sealants and the solvent use associated with the use of these materials. With the exception of the printing plate manufacturing operation (N-3852-19), all of the permitted operations, including the laminator operating under permit N-3852-17, are Graphic Arts Printing Operations as defined in Rule 4607. Therefore, per section 4.1.8, the equipment (except for unit N-3852-19) is subject only to the work practice requirements of section 5.3.

<table>
<thead>
<tr>
<th>New Title V Permit Number</th>
<th>Condition #</th>
<th>Requirement</th>
<th>Basis</th>
</tr>
</thead>
<tbody>
<tr>
<td>N-3852-1-5</td>
<td>11</td>
<td>Work practices</td>
<td></td>
</tr>
<tr>
<td>N-3852-2-5</td>
<td></td>
<td>Storage and disposal of adhesives and other waste</td>
<td>Sect 5.3.1</td>
</tr>
<tr>
<td>N-3852-9-3</td>
<td>12</td>
<td>Closed mixing containers</td>
<td>Sect 5.3.2</td>
</tr>
<tr>
<td>N-3852-13-2</td>
<td>13</td>
<td>Spill minimization</td>
<td>Sect 5.3.3</td>
</tr>
<tr>
<td>N-3852-17-1</td>
<td>14</td>
<td>VOC containing material transport</td>
<td>Sect 5.3.4</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>New Title V Permit Number</th>
<th>Condition #</th>
<th>Requirement</th>
<th>Basis</th>
</tr>
</thead>
<tbody>
<tr>
<td>N-3852-14-2</td>
<td>12</td>
<td>Work practices</td>
<td></td>
</tr>
<tr>
<td>N-3852-15-1</td>
<td></td>
<td>Storage and disposal of adhesives and other waste</td>
<td>Sect 5.3.1</td>
</tr>
<tr>
<td>N-3852-16-2</td>
<td>13</td>
<td>Closed mixing containers</td>
<td>Sect 5.3.2</td>
</tr>
<tr>
<td>N-3852-18-1</td>
<td>14</td>
<td>Spill minimization</td>
<td>Sect 5.3.3</td>
</tr>
<tr>
<td>N-3852-20-1</td>
<td>15</td>
<td>VOC containing material transport</td>
<td>Sect 5.3.4</td>
</tr>
</tbody>
</table>
District Rule 4661, *Organic Solvents*  
(last amended September 20, 2007)

N-3852-1-5, N-3852-2-5, N-3852-9-3, N-3852-13-2, N-3852-14-2, N-3852-15-1, N-3852-16-2, N-3852-17-1 and N-3852-18-1:

These units are subject to District Rule 4607 (Graphic Arts and Paper, Film, Foil and Fabric Coatings) and are therefore exempt from Rule 4661 per section 4.2.7.

**N-3852-19-1 (Printing Plate Manufacturing Operation)**

<table>
<thead>
<tr>
<th>New Title V Permit Number</th>
<th>Condition #</th>
<th>Requirement</th>
<th>Basis</th>
</tr>
</thead>
<tbody>
<tr>
<td>N-3852-19-1</td>
<td>3, 4</td>
<td>VOC emission limit</td>
<td>Sect 5.8</td>
</tr>
<tr>
<td></td>
<td>N/A – Note 1</td>
<td>Organic solvent cleaning, storage and disposal</td>
<td>Sect 5.10</td>
</tr>
<tr>
<td></td>
<td>10</td>
<td>Materials list</td>
<td>Sect 6.1.2.1</td>
</tr>
<tr>
<td></td>
<td>11</td>
<td>Daily material usage</td>
<td>Sect 6.1.2.2</td>
</tr>
<tr>
<td></td>
<td>14</td>
<td>Record retention</td>
<td>Sect 6.1.4</td>
</tr>
</tbody>
</table>

Note 1: Section 5.10 of this rule states that compliance with Rule 4663 is required when performing organic solvent cleaning and storage and disposal of organic solvents, waste solvents, coatings, adhesives, catalysts and thinners. Coatings, adhesives, catalysts and thinners are not used in this operation and the materials used do not meet the Rule 4663 definition of “Solvent”. Therefore, this requirement does not apply.
District Rule 4801, Sulfur Compounds  
(last amended December 17, 1992)

The facility does not operate any fuel burning equipment that is subject to a District Permit to Operate. Therefore, conditions requiring compliance with this rule are not necessary.

40 CFR Part 60 Subpart QQ, Standards of Performance for the Graphic Arts Industry: Publication Rotogravure Printing

Per section 60.430, this subpart applies only to publication rotogravure printing presses. None of the presses at the facility are the rotogravure type, therefore, this subpart does not apply.

40 CFR Part 63, Subpart KK, National Emission Standards for the Printing and Publishing Industry

§63.820 Applicability

This facility has establish itself as an area source of HAP emissions by limiting its HAP potential to emit (Project N-1113462), as described in §63.820(a)(2). Pursuant to §63.820(a)(3), area sources are only subject to the provisions of §63.829(d) and §63.830(b)(1) of this subpart.

§63.829(d) states that the owner or operator must keep records of all required measurements and calculations needed to demonstrate compliance with the HAP emission limit.

§63.830(b)(1) requires the facility to submit an initial notification to the District. The Initial TV permit application includes the data required by the notification; therefore, this requirement has been satisfied.

The following conditions will be included on the new Title V permits. Refer to the table below for the condition numbers on a permit basis:

Total stationary source emissions shall not exceed 10 tons in any rolling-12 month period of any single hazardous air pollutant (HAP) (as defined in 40 CFR 63.2) and 25 tons in any rolling-12 month period of any combination of HAPs. [District Rule 4002 and 40 CFR 63 Subpart KK]

The operator shall maintain records of the emissions of each individual HAP and of the combined HAP emissions. The records shall be kept on a rolling 12-month basis and shall be updated at least monthly. District approved estimating techniques shall be used to determine the HAP emissions. The monthly records shall include records of all
required measurements and calculations necessary to demonstrate compliance, including the mass of all HAP containing materials used and the mass fraction of each HAP present in each HAP containing material. [District Rule 4002 and 40 CFR Part 63 Subpart KK]

<table>
<thead>
<tr>
<th>New Title V Permit Number</th>
<th>Condition #</th>
<th>Requirement</th>
<th>Basis</th>
</tr>
</thead>
<tbody>
<tr>
<td>N-3852-1-5</td>
<td>4</td>
<td>HAP emission limit</td>
<td>40 CFR Part 63.820(a)(3)</td>
</tr>
<tr>
<td>N-3852-2-5</td>
<td>4</td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-3852-9-3</td>
<td>4</td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-3852-13-2</td>
<td>4</td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-3852-14-2</td>
<td>4</td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-3852-15-1</td>
<td>4</td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-3852-16-2</td>
<td>4</td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-3852-17-1</td>
<td>4</td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-3852-18-1</td>
<td>4</td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-3852-19-1</td>
<td>5</td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-3852-20-1</td>
<td>4</td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-3852-1-5</td>
<td>23</td>
<td>HAP emission records</td>
<td>40 CFR Part 63.829(d)</td>
</tr>
<tr>
<td>N-3852-2-5</td>
<td>23</td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-3852-9-3</td>
<td>23</td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-3852-13-2</td>
<td>23</td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-3852-14-2</td>
<td>24</td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-3852-15-1</td>
<td>25</td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-3852-16-2</td>
<td>25</td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-3852-17-1</td>
<td>23</td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-3852-18-1</td>
<td>24</td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-3852-19-1</td>
<td>13</td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-3852-20-1</td>
<td>25</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>


Per section 63.3290, this subpart applies only to Major HAP sources as defined in section 63.2. It was determined during the processing of the application for Authority-to-Construct N-3852-20-0 (Project N-1113462) that the facility is not currently a major HAP source and that Authority-to-Construct includes conditions prohibiting HAP emissions in excess of the major HAP source thresholds. Those conditions will be placed on the remainder of the permits at this time. Since this facility is not a Major HAP source, this subpart does not apply.
40 CFR Part 64, Compliance Assurance Monitoring (CAM)

For a unit to be subject to CAM, all of the following must be true:

1. The facility must be a Major Source
2. The unit must have an emission limit that is complied with utilizing a control device
3. The uncontrolled emissions from the unit must be in excess of the Major Source threshold.

Although the facility is a Major Source for VOC, none of the VOC emission limits is complied with utilizing an emission control device. Therefore, CAM is not required.

Non-Federally Enforceable Rules:

District Rule 1070, Inspections (amended December 17, 1992)
District Rule 4102, Nuisance (amended December 17, 1992)

Any permit conditions attributable solely to these rules will be identified as non-Federally enforceable.

IX. Permit Shields

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 Permit to Operate is considered compliance with all applicable requirements upon which those conditions are based.
A. Requirements addressed by Model General Permit Templates

1. Model General Permit Template SJV-UM-03

   The facility submitted a Title V General Permit Template Qualification form for the use of Facility-Wide Umbrella General Permit Template SJV-UM-0-3. Therefore, the permit shields granted in General Permit Template SJV-UM-03 are included as conditions 39 and 40 of permit N-3852-0-1.

B. Permit Shield Requirements Not Addressed by Model General Permit Templates

1. None.

X. Permit Conditions

See Appendix A – Draft Initial Title V Operating Permit

XI. Appendices

Appendix A: Draft Initial Title V Operating Permit
Appendix B: Detailed Facility List
Appendix A
Draft Initial Title V Operating Permit
San Joaquin Valley
Air Pollution Control District

FACILITY: N-3852-0-1

FACILITY-WIDE REQUIREMENTS

1. (4362) 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. (4363) 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. (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, 9.9.1 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 2631] 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

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: LABEL TECHNOLOGY, INC.
Location: 20920 WARDROBE AVE, MERCED, CA 95340

DRAFT

N-3852-0-1: Jan 18 2013 8:54AM - SCRD/RKM
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

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 permittee, 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. (4384) No person shall manufacture, blend, repackage, supply, sell, solicit or apply any architectural coating with a VOC content in excess of the corresponding limit specified in Table of Standards 1 effective until 12/30/10 or Table of Standards 2 effective on and after 1/1/11 of District Rule 4601 (12/17/09) for use or sale within the District. [District Rule 4601, 5.1] Federally Enforceable Through Title V Permit

24. (4385) All VOC-containing materials subject to Rule 4601 (12/17/09) shall be stored in closed containers when not in use. [District Rule 4601, 5.4] Federally Enforceable Through Title V Permit

25. (4386) The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.3 (12/17/09). [District Rule 4601, 6.1 and 6.3] Federally Enforceable Through Title V Permit

26. (4387) With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.13.1 and 10.0] Federally Enforceable Through Title V Permit

27. (4388) If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR Part 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit

28. (4389) If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR Part 82, Subpart B. [40 CFR Part 82, Subpart B] Federally Enforceable Through Title V Permit

29. (4390) Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (08/19/2004) or Rule 8011 (08/19/2004). [District Rule 8021 and 8011] 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 (08/19/2004) or Rule 8011 (08/19/2004). [District Rule 8031 and 8011] 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 (08/19/2004) or Rule 8011 (08/19/2004). [District Rule 8041 and 8011] 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 (08/19/2004) or Rule 8011 (08/19/2004). [District Rule 8051 and 8011] 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 (08/19/2004) or Rule 8011 (08/19/2004). [District Rule 8061 and 8011] Federally Enforceable Through Title V Permit
34. (4395) Any unpaved vehicle/equipment area that anticipates more than 50 average annual daily trips (AADT) shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 150 vehicle trips per day (VDT) shall comply with the requirements of Section 5.1.2 of District Rule 8071. On each day that 25 or more VDT with 3 or more axles will occur on an unpaved vehicle/equipment traffic area, the owner/operator shall comply with the requirements of Section 5.1.3 of District Rule 8071. On each day when a special event will result in 1,000 or more vehicles that will travel/park on an unpaved area, the owner/operator shall comply with the requirements of Section 5.1.4 of District Rule 8071. All sources shall comply with the requirements of Section 5.0 of District Rule 8071 unless specifically exempted under Section 4.0 of Rule 8071 (9/16/2004) or Rule 8011 (8/19/2004). [District Rule 8071 and Rule 8011] 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); 2086 (12/17/92); 4101 (2/27/05); 4601 (12/17/99); 8621 (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

These terms and conditions are part of the Facility-wide Permit to Operate.
San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: N-3852-1-5

EXPIRATION DATE: 10/31/2017

EQUIPMENT DESCRIPTION:
GRAPHIC ARTS PRINTING OPERATION CONSISTING OF A ROTOPRESS MODEL #2002 10 INCH 6-COLOR
FLEXOGRAPHIC PRINTING PRESS

PERMIT UNIT REQUIREMENTS

1. (98) No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. The facility-wide VOC emissions, on a rolling 12-month basis, shall be less than 50,000 pounds. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The VOC emissions shall not exceed 49.2 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The facility-wide emissions of hazardous air pollutants (HAPs) shall not exceed 10 tons in any rolling 12-month period of any single HAP (as defined in 40 CFR 63.2) and 25 tons in any rolling 12-month period of any combination of HAPs. [District Rule 4002 and 40 CFR Part 63 Subpart KK] Federally Enforceable Through Title V Permit
5. The VOC content of graphic arts materials shall not exceed any of the following limits: inks for porous substrates; 225 g/l (1.88 lb/gal), all other inks; 300 g/l (2.5 lb/gal), coatings; 300 g/l (2.5 lb/gal), adhesives; 150 g/l (1.25 lb/gal). These VOC content limits are in g/l or lb/gal less water and exempt compounds, as applied. [District Rule 4607] Federally Enforceable Through Title V Permit
6. The VOC content of specialty inks shall not exceed 300 g/l (2.5 lb/gal) less water and exempt compounds, as applied. [District Rule 4607] Federally Enforceable Through Title V Permit
7. The use of specialty inks, as defined in District Rule 4607, shall not exceed 2 gallons in a calendar day and 120 gallons in a calendar year. [District Rule 4607] Federally Enforceable Through Title V Permit
8. Except during the cleaning of specialty ink application equipment, the VOC content of solvents shall not exceed 25 g/l (0.21 lb/gal). [District Rule 4607] Federally Enforceable Through Title V Permit
9. If using solvents with VOC contents in excess of 25 g/l (0.21 lb/gal) to clean specialty ink application equipment, cleaning shall be performed utilizing only the following methods: (1) wipe cleaning or, (2) application of solvent from hand-held 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 that 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 it 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
10. Solvent shall not be atomized into the open air unless it is vented to a VOC control device that complies with section 5.6 of District Rule 4607. This provision shall not apply to printing operations where roller or blanket wash is applied automatically and the cleaning of nozzle tips of automated spray equipment systems, except for robotic systems, and cleaning with spray bottles or containers from which the solvents are dispensed with a propellant-induced force. [District Rule 4607] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

Facility Name: LABEL TECHNOLOGY, INC.
Location: 2050 WARDROBE AVE, MERCED, CA 95340

N-3852-1-5: Jan 18 2013 05:44AM - SCHWIND
11. The operator shall store and dispose of fresh and spent solvents, waste solvent cleaning materials, coatings, adhesives, catalysts, thinners and inks in closed, non-absorbent, non-leaking, self closing containers. The containers shall remain closed at all times except when depositing or removing their contents or when they are empty. [District Rules 4607 and 4653] Federally Enforceable Through Title V Permit

12. The operator shall keep mixers containing VOC-containing adhesives and process-related waste materials closed at all times except when depositing or removing these materials. [District Rule 4653] Federally Enforceable Through Title V Permit

13. The operator shall minimize spills of VOC containing adhesive products and process-related waste. [District Rule 4653] Federally Enforceable Through Title V Permit

14. The operator shall convey VOC containing adhesive products and process-related waste materials from one location to another in closed containers or pipes. [District Rule 4653] Federally Enforceable Through Title V Permit

15. Coatings shall be applied utilizing only the following types of equipment (as defined in Rule 4607): flow coaters, roll coaters, dip coaters, foam coaters, die coaters and hand applicators. [District Rules 2201 and 4607] Federally Enforceable Through Title V Permit

16. The operator 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

17. The operator shall maintain a current file documenting the coatings, inks, adhesives, fountain solutions, wash primers and solvents in use and in storage. The file shall include a material safety data sheet or product data sheet for each material showing the material name, manufacturer's name, VOC content as applied, specific mixing instructions and density. [District Rule 4607] Federally Enforceable Through Title V Permit

18. The operator shall record, on a monthly basis, the type and amount of all inks used according to one of the following methods: (1) group the quantity of all inks used and identify the maximum VOC content and use the maximum density of 1,010 g/l (8.44 lb/gal), (2) report process inks and pantone inks separately and use specific VOC content and density values for each process ink, and the highest VOC content and the maximum density of 1,010 g/l (8.44 lb/gal) for pantone inks or, (3) report process inks and pantone inks separately and use the maximum VOC content and minimum density value for both process and pantone inks, or use the density of 1,010 g/l (8.44 lb/gal) for pantone inks or, (4) itemize each ink and pantone ink and use the specific VOC content and density value for each. [District Rule 4607] Federally Enforceable Through Title V Permit

19. The operator shall record, on a monthly basis, the type and amount of each coating, adhesive, wash primer and solvent (including cleaning solvents) used. [District Rule 4607] Federally Enforceable Through Title V Permit

20. The operator shall record, on a monthly basis, the type, amount and percent VOC by volume of each fountain solution used. [District Rule 4607] Federally Enforceable Through Title V Permit

21. The operator shall record, on a daily basis, the type and amount of each specialty ink (as defined in Rule 4607) used. [District Rule 4607] Federally Enforceable Through Title V Permit

22. A record of the facility-wide VOC emissions, on a rolling 12-month basis, shall be kept. The records shall be updated at least monthly. [District Rule 2201] Federally Enforceable Through Title V Permit

23. The operator shall maintain records of the emissions of each individual HAP and of the combined HAP emissions. The records shall be kept on a rolling 12-month basis and shall be updated at least monthly. District approved estimating techniques shall be used to determine the HAP emissions. The monthly records shall include records of all required measurements and calculations necessary to demonstrate compliance, including the mass of all HAP containing materials used and the mass fraction of each HAP present in each HAP containing material. [District Rule 4002 and 40 CFR Part 63 Subpart KK] Federally Enforceable Through Title V Permit

24. All records shall be maintained for a period of at least five years and shall be made available to the District, ARB and EPA upon request. [District Rules 2201 and 4607] Federally Enforceable Through Title V Permit
PERMIT UNIT REQUIREMENTS

1. (98) No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

2. The facility-wide VOC emissions, on a rolling 12-month basis, shall be less than 50,000 pounds. [District Rule 2201] Federally Enforceable Through Title V Permit

3. The VOC emissions shall not exceed 49.2 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit

4. The facility-wide emissions of hazardous air pollutants (HAPs) shall not exceed 10 tons in any rolling 12-month period of any single HAP (as defined in 40 CFR 63.2) and 25 tons in any rolling 12-month period of any combination of HAPs. [District Rule 4002 and 40 CFR Part 63 Subpart KK] Federally Enforceable Through Title V Permit

5. The VOC content of graphic arts materials shall not exceed any of the following limits: inks for porous substrates; 225 g/l (1.88 lb/gal), all other inks; 300 g/l (2.5 lb/gal), coatings; 300 g/l (2.5 lb/gal), adhesives; 150 g/l (1.25 lb/gal). These VOC content limits are in g/l or lb/gal less water and exempt compounds, as applied. [District Rule 4607] Federally Enforceable Through Title V Permit

6. The VOC content of specialty inks shall not exceed 300 g/l (2.5 lb/gal) less water and exempt compounds, as applied. [District Rule 4607] Federally Enforceable Through Title V Permit

7. The use of specialty inks, as defined in District Rule 4607, shall not exceed 2 gallons in a calendar day and 120 gallons in a calendar year. [District Rule 4607] Federally Enforceable Through Title V Permit

8. Except during the cleaning of specialty ink application equipment, the VOC content of solvents shall not exceed 25 g/l (0.21 lb/gal). [District Rule 4607] Federally Enforceable Through Title V Permit

9. If using solvents with VOC contents in excess of 25 g/l (0.21 lb/gal) to clean specialty ink application equipment, cleaning shall be performed utilizing only the following methods: (1) wipe cleaning or, (2) application of solvent from hand-held 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 that 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 it 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

10. Solvent shall not be atomized into the open air unless it is vented to a VOC control device that complies with section 5.6 of District Rule 4607. This provision shall not apply to printing operations where roller or blanket wash is applied automatically and the cleaning of nozzle tips of automated spray equipment systems, except for robotic systems, and cleaning with spray bottles or containers from which the solvents are dispensed with a propellant-induced force. [District Rule 4607] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.
11. The operator shall store and dispose of fresh and spent solvents, waste solvent cleaning materials, coatings, adhesives, catalysts, thinners and inks in closed, non-absorbent, non-leaking, self closing containers. The containers shall remain closed at all times except when depositing or removing their contents or when they are empty. [District Rules 4607 and 4653] Federally Enforceable Through Title V Permit

12. The operator shall keep mixing containers for VOC-containing adhesives and process-related waste materials closed at all times except when depositing or removing these materials. [District Rule 4653] Federally Enforceable Through Title V Permit

13. The operator shall minimize spills of VOC containing adhesive products and process-related waste. [District Rule 4653] Federally Enforceable Through Title V Permit

14. The operator shall convey VOC containing adhesive products and process-related waste materials from one location to another in closed containers or pipes. [District Rule 4653] Federally Enforceable Through Title V Permit

15. Coatings shall be applied utilizing only the following types of equipment (as defined in Rule 4607): flow coaters, roll coaters, dip coaters, foam coaters, die coaters and hand applicators. [District Rules 2201 and 4607] Federally Enforceable Through Title V Permit

16. The operator 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

17. The operator shall maintain a current file documenting the coatings, inks, adhesives, fountain solutions, wash primers and solvents in use and in storage. The file shall include a material safety data sheet or product data sheet for each material showing the material name, manufacturer's name, VOC content as applied, specific mixing instructions and density. [District Rule 4607] Federally Enforceable Through Title V Permit

18. The operator shall record, on a monthly basis, the type and amount of all inks used according to one of the following methods; (1) group the quantity of all inks used and identify the maximum VOC content and use the maximum density of 1,010 g/l (8.44 lb/gal), (2) report process inks and pantone inks separately and use specific VOC content and density values for each process ink, and the highest VOC content and the maximum density of 1,010 g/l (8.44 lb/gal) for pantone inks or, (3) report process inks and pantone inks separately and use the maximum VOC content and minimum density value for both process and pantone inks, or use the density of 1,010 g/l (8.44 lb/gal) for pantone inks or, (4) itemize each ink and pantone ink and use the specific VOC content and density value for each. [District Rule 4607] Federally Enforceable Through Title V Permit

19. The operator shall record, on a monthly basis, the type and amount of each coating, adhesive, wash primer and solvent (including cleaning solvents) used. [District Rule 4607] Federally Enforceable Through Title V Permit

20. The operator shall record, on a monthly basis, the type, amount and percent VOC by volume of each fountain solution used. [District Rule 4607] Federally Enforceable Through Title V Permit

21. The operator shall record, on a daily basis, the type and amount of each specialty ink (as defined in Rule 4607) used. [District Rule 4607] Federally Enforceable Through Title V Permit

22. A record of the facility-wide VOC emissions, on a rolling 12-month basis, shall be kept. The records shall be updated at least monthly. [District Rule 2201] Federally Enforceable Through Title V Permit

23. The operator shall maintain records of the emissions of each individual HAP and of the combined HAP emissions. The records shall be kept on a rolling 12-month basis and shall be updated at least monthly. District approved estimating techniques shall be used to determine the HAP emissions. The monthly records shall include records of all required measurements and calculations necessary to demonstrate compliance, including the mass of all HAP containing materials used and the mass fraction of each HAP present in each HAP containing material. [District Rule 4002 and 40 CFR Part 63 Subpart KK] Federally Enforceable Through Title V Permit

24. All records shall be maintained for a period of at least five years and shall be made available to the District, ARB and EPA upon request. [District Rules 2201 and 4607] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.
PERMIT UNIT: N-3852-9-3

EQUIPMENT DESCRIPTION:
GRAPHIC ARTS PRINTING OPERATION CONSISTING OF A ROTOPRESS 10 INCH 8-COLOR FLEXOGRAPHIC PRESS

PERMIT UNIT REQUIREMENTS

1. [98] No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

2. The facility-wide VOC emissions, on a rolling 12-month basis, shall be less than 50,000 pounds. [District Rule 2201] Federally Enforceable Through Title V Permit

3. The VOC emissions shall not exceed 49.2 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit

4. The facility-wide emissions of hazardous air pollutants (HAPs) shall not exceed 10 tons in any rolling 12-month period of any single HAP (as defined in 40 CFR 63.2) and 25 tons in any rolling 12-month period of any combination of HAPs. [District Rule 4002 and 40 CFR Part 63 Subpart KK] Federally Enforceable Through Title V Permit

5. The VOC content of graphic arts materials shall not exceed any of the following limits: inks for porous substrates; 225 g/l (1.88 lb/gal), all other inks; 300 g/l (2.5 lb/gal), coatings; 300 g/l (2.5 lb/gal), adhesives; 150 g/l (1.25 lb/gal). These VOC content limits are in g/l or lb/gal less water and exempt compounds, as applied. [District Rule 4607] Federally Enforceable Through Title V Permit

6. The VOC content of specialty inks shall not exceed 300 g/l (2.5 lb/gal) less water and exempt compounds, as applied. [District Rule 4607] Federally Enforceable Through Title V Permit

7. The use of specialty inks, as defined in District Rule 4607, shall not exceed 2 gallons in a calendar day and 120 gallons in a calendar year. [District Rule 4607] Federally Enforceable Through Title V Permit

8. Except during the cleaning of specialty ink application equipment, the VOC content of solvents shall not exceed 25 g/l (0.21 lb/gal). [District Rule 4607] Federally Enforceable Through Title V Permit

9. If using solvents with VOC contents in excess of 25 g/l (0.21 lb/gal) to clean specialty ink application equipment, cleaning shall be performed utilizing only the following methods: (1) wipe cleaning or, (2) application of solvent from hand-held 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 that 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 it 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

10. Solvent shall not be atomized into the open air unless it is vented to a VOC control device that complies with section 5.6 of District Rule 4607. This provision shall not apply to printing operations where roller or blanket wash is applied automatically and the cleaning of nozzle tips of automated spray equipment systems, except for robotic systems, and cleaning with spray bottles or containers from which the solvents are dispensed with a propellant-induced force. [District Rule 4607] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-Wide Permit to Operate.
11. The operator shall store and dispose of fresh and spent solvents, waste solvent cleaning materials, coatings, adhesives, catalysts, thinners and inks in closed, non-absorbent, non-leaking, self closing containers. The containers shall remain closed at all times except when depositing or removing their contents or when they are empty. [District Rules 4607 and 4653] Federally Enforceable Through Title V Permit

12. The operator shall keep mixing containers for VOC-containing adhesives and process-related waste materials closed at all times except when depositing or removing these materials. [District Rule 4653] Federally Enforceable Through Title V Permit

13. The operator shall minimize spills of VOC containing adhesive products and process-related waste. [District Rule 4653] Federally Enforceable Through Title V Permit

14. The operator shall convey VOC containing adhesive products and process-related waste materials from one location to another in closed containers or pipes. [District Rule 4653] Federally Enforceable Through Title V Permit

15. Coatings shall be applied utilizing only the following types of equipment (as defined in Rule 4607): flow coaters, roll coaters, dip coaters, foam coaters, die coaters and hand applicators. [District Rules 2201 and 4607] Federally Enforceable Through Title V Permit

16. The operator 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

17. The operator shall maintain a current file documenting the coatings, inks, adhesives, fountain solutions, wash primers and solvents in use and in storage. The file shall include a material safety data sheet or product data sheet for each material showing the material name, manufacturer's name, VOC content as applied, specific mixing instructions and density. [District Rule 4607] Federally Enforceable Through Title V Permit

18. The operator shall record, on a monthly basis, the type and amount of all inks used according to one of the following methods; (1) group the quantity of all inks used and identify the maximum VOC content and use the maximum density of 1,010 g/l (8.44 lb/gal), (2) report process inks and pantone inks separately and use specific VOC content and density values for each process ink, and the highest VOC content and the maximum density of 1,010 g/l (8.44 lb/gal) for pantone inks or, (3) report process inks and pantone inks separately and use the maximum VOC content and maximum density value for both process and pantone inks, or use the density of 1,010 g/l (8.44 lb/gal) for pantone inks or, (4) itemize each ink and pantone ink and use the specific VOC content and density value for each. [District Rule 4607] Federally Enforceable Through Title V Permit

19. The operator shall record, on a monthly basis, the type and amount of each coating, adhesive, wash primer and solvent (including cleaning solvents) used. [District Rule 4607] Federally Enforceable Through Title V Permit

20. The operator shall record, on a monthly basis, the type, amount and percent VOC by volume of each fountain solution used. [District Rule 4607] Federally Enforceable Through Title V Permit

21. The operator shall record, on a daily basis, the type and amount of each specialty ink (as defined in Rule 4607) used. [District Rule 4607] Federally Enforceable Through Title V Permit

22. A record of the facility-wide VOC emissions, on a rolling 12-month basis, shall be kept. The records shall be updated at least monthly. [District Rule 2201] Federally Enforceable Through Title V Permit

23. The operator shall maintain records of the emissions of each individual HAP and of the combined HAP emissions. The records shall be kept on a rolling 12-month basis and shall be updated at least monthly. District approved estimating techniques shall be used to determine the HAP emissions. The monthly records shall include records of all required measurements and calculations necessary to demonstrate compliance, including the mass of all HAP containing materials used and the mass fraction of each HAP present in each HAP containing material. [District Rule 4002 and 40 CFR Part 63 Subpart KK] Federally Enforceable Through Title V Permit

24. All records shall be maintained for a period of at least five years and shall be made available to the District, ARB and EPA upon request. [District Rules 2201 and 4607] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.
San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: N-3852-13-2

EXPIRATION DATE: 10/31/2017

EQUIPMENT DESCRIPTION:
GRAPHIC ARTS PRINTING OPERATION CONSISTING OF A 9-COLOR MARK ANDY MODEL 74150 FLEXOGRAPHIC PRINTING PRESS (PRESS IS EQUIPPED WITH PERMIT EXEMPT ELECTRICAL DRYERS)

PERMIT UNIT REQUIREMENTS

1. [98] No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

2. The facility-wide VOC emissions, on a rolling 12-month basis, shall be less than 50,000 pounds. [District Rule 2201]
   Federally Enforceable Through Title V Permit

3. The VOC emissions shall not exceed 40.0 pounds in any one day. [District Rule 2201]
   Federally Enforceable Through Title V Permit

4. The facility-wide emissions of hazardous air pollutants (HAPs) shall not exceed 10 tons in any rolling 12-month period of any single HAP (as defined in 40 CFR 63.2) and 25 tons in any rolling 12-month period of any combination of HAPs. [District Rule 4002 and 40 CFR Part 63 Subpart KK]
   Federally Enforceable Through Title V Permit

5. The VOC content of graphic arts materials shall not exceed any of the following limits: inks for porous substrates; 225 g/l (1.88 lb/gal), all other inks; 300 g/l (2.5 lb/gal), coatings; 300 g/l (2.5 lb/gal), adhesives; 150 g/l (1.25 lb/gal).
   These VOC content limits are in g/l or lb/gal less water and exempt compounds, as applied. [District Rule 4607]
   Federally Enforceable Through Title V Permit

6. The VOC content of specialty inks shall not exceed 300 g/l (2.5 lb/gal) less water and exempt compounds, as applied. [District Rule 4607]
   Federally Enforceable Through Title V Permit

7. The use of specialty inks, as defined in District Rule 4607, shall not exceed 2 gallons in a calendar day and 120 gallons in a calendar year. [District Rule 4607]
   Federally Enforceable Through Title V Permit

8. Except during the cleaning of specialty ink application equipment, the VOC content of solvents shall not exceed 25 g/l (0.21 lb/gal). [District Rule 4607]
   Federally Enforceable Through Title V Permit

9. If using solvents with VOC contents in excess of 25 g/l (0.21 lb/gal) to clean specialty ink application equipment, cleaning shall be performed utilizing only the following methods: (1) wipe cleaning or, (2) application of solvent from hand-held 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 that 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 it 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

10. Solvent shall not be atomized into the open air unless it is vented to a VOC control device that complies with section 5.6 of District Rule 4607. This provision shall not apply to printing operations where roller or blanket wash is applied automatically and the cleaning of nozzle tips of automated spray equipment systems, except for robotic systems, and cleaning with spray bottles or containers from which the solvents are dispensed with a propellant-induced force. [District Rule 4607]
    Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

Facility Name: LABEL TECHNOLOGY, INC.
Location: 2050 WARDROBE AVE, MERCED, CA 95340
N-3852-13-2: Jan 18 2013 8:54AM - SCHROHOM
11. The operator shall store and dispose of fresh and spent solvents, waste solvent cleaning materials, coatings, adhesives, catalysts, thinners and inks in closed, non-absorbent, non-leaking, self closing containers. The containers shall remain closed at all times except when depositing or removing their contents or when they are empty. [District Rules 4607 and 4653] Federally Enforceable Through Title V Permit

12. The operator shall keep mixing containers for VOC-containing adhesives and process-related waste materials closed at all times except when depositing or removing these materials. [District Rule 4653] Federally Enforceable Through Title V Permit

13. The operator shall minimize spills of VOC containing adhesive products and process-related waste. [District Rule 4653] Federally Enforceable Through Title V Permit

14. The operator shall convey VOC containing adhesive products and process-related waste materials from one location to another in closed containers or pipes. [District Rule 4653] Federally Enforceable Through Title V Permit

15. Coatings shall be applied utilizing only the following types of equipment (as defined in Rule 4607): flow coaters, roll coaters, dip coaters, foam coaters, die coaters and hand applicators. [District Rules 2201 and 4607] Federally Enforceable Through Title V Permit

16. The operator 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

17. The operator shall maintain a current file documenting the coatings, inks, adhesives, fountain solutions, wash primers and solvents in use and in storage. The file shall include a material safety data sheet or product data sheet for each material showing the material name, manufacturer's name, VOC content as applied, specific mixing instructions and density. [District Rule 4607] Federally Enforceable Through Title V Permit

18. The operator shall record, on a monthly basis, the type and amount of all inks used according to one of the following methods; (1) group the quantity of all inks used and identify the maximum VOC content and use the maximum density of 1,010 g/l (8.44 lb/gal), (2) report process inks and pantone inks separately and use specific VOC content and density values for each process ink, and the highest VOC content and the maximum density of 1,010 g/l (8.44 lb/gal) for pantone inks or, (3) report process inks and pantone inks separately and use the maximum VOC content and minimum density value for both process and pantone inks, or use the density of 1,010 g/l (8.44 lb/gal) for pantone inks or, (4) itemize each ink and pantone ink and use the specific VOC content and density value for each. [District Rule 4607] Federally Enforceable Through Title V Permit

19. The operator shall record, on a monthly basis, the type and amount of each coating, adhesive, wash primer and solvent (including cleaning solvents) used. [District Rule 4607] Federally Enforceable Through Title V Permit

20. The operator shall record, on a monthly basis, the type, amount and percent VOC by volume of each fountain solution used. [District Rule 4607] Federally Enforceable Through Title V Permit

21. The operator shall record, on a daily basis, the type and amount of each specialty ink (as defined in Rule 4607) used. [District Rule 4607] Federally Enforceable Through Title V Permit

22. A record of the facility-wide VOC emissions, on a rolling 12-month basis, shall be kept. The records shall be updated at least monthly. [District Rule 2201] Federally Enforceable Through Title V Permit

23. The operator shall maintain records of the emissions of each individual HAP and of the combined HAP emissions. The records shall be kept on a rolling 12-month basis and shall be updated at least monthly. District approved estimating techniques shall be used to determine the HAP emissions. The monthly records shall include records of all required measurements and calculations necessary to demonstrate compliance, including the mass of all HAP containing materials used and the mass fraction of each HAP present in each HAP containing material. [District Rule 4002 and 40 CFR Part 63 Subpart KK] Federally Enforceable Through Title V Permit

24. All records shall be maintained for a period of at least five years and shall be made available to the District, ARB and EPA upon request. [District Rules 2201 and 4607] Federally Enforceable Through Title V Permit

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

1. [98] No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

2. The facility-wide VOC emissions, on a rolling 12-month basis, shall be less than 50,000 pounds. [District Rule 2201] Federally Enforceable Through Title V Permit

3. The VOC emissions shall not exceed 20.0 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit

4. The facility-wide emissions of hazardous air pollutants (HAPs) shall not exceed 10 tons in any rolling 12-month period of any single HAP (as defined in 40 CFR 63.2) and 25 tons in any rolling 12-month period of any combination of HAPs. [District Rule 4002 and 40 CFR Part 63 Subpart KK] Federally Enforceable Through Title V Permit

5. This press shall be utilized only for printing onto low porosity materials. [District Rule 2201] Federally Enforceable Through Title V Permit

6. The VOC content of the inks applied utilizing this press shall not exceed 2.4 lb/gal, less water and exempt compounds. [District Rules 2201 and 4607] Federally Enforceable Through Title V Permit

7. The VOC content of graphic arts materials shall not exceed the following limits: coatings; 300 g/l (2.5 lb/gal), adhesives; 150 g/l (1.25 lb/gal). These VOC content limits are in g/l or lb/gal less water and exempt compounds, as applied. [District Rule 4607] Federally Enforceable Through Title V Permit

8. The use of specialty inks, as defined in District Rule 4607, shall not exceed 2 gallons in a calendar day and 120 gallons in a calendar year. [District Rule 4607] Federally Enforceable Through Title V Permit

9. Except during the cleaning of specialty ink application equipment, the VOC content of solvents shall not exceed 25 g/l (0.21 lb/gal). [District Rule 4607] Federally Enforceable Through Title V Permit

10. If using solvents with VOC contents in excess of 25 g/l (0.21 lb/gal) to clean specialty ink application equipment, cleaning shall be performed utilizing only the following methods: (1) wipe cleaning or, (2) application of solvent from hand-held 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 that 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 it 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
11. Solvent shall not be atomized into the open air unless it is vented to a VOC control device that complies with section 5.6 of District Rule 4607. This provision shall not apply to printing operations where roller or blanket wash is applied automatically and the cleaning of nozzle tips of automated spray equipment systems, except for robotic systems, and cleaning with spray bottles or containers from which the solvents are dispensed with a propellant-induced force. [District Rule 4607] Federally Enforceable Through Title V Permit

12. The operator shall store and dispose of fresh and spent solvents, waste solvent cleaning materials, coatings, adhesives, catalysts, thinners and inks in closed, non-absorbent, non-leaking, self closing containers. The containers shall remain closed at all times except when depositing or removing their contents or when they are empty. [District Rules 4607 and 4653] Federally Enforceable Through Title V Permit

13. The operator shall keep mixing containers for VOC-containing adhesives and process-related waste materials closed at all times except when depositing or removing these materials. [District Rule 4653] Federally Enforceable Through Title V Permit

14. The operator shall minimize spills of VOC containing adhesive products and process-related waste. [District Rule 4653] Federally Enforceable Through Title V Permit

15. The operator shall convey VOC containing adhesive products and process-related waste materials from one location to another in closed containers or pipes. [District Rule 4653] Federally Enforceable Through Title V Permit

16. Coatings shall be applied utilizing only the following types of equipment (as defined in Rule 4607): flow coaters, roll coaters, dip coaters, foam coaters, die coaters and hand applicators. [District Rules 2201 and 4607] Federally Enforceable Through Title V Permit

17. The operator 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

18. The operator shall maintain a current file documenting the coatings, inks, adhesives, fountain solutions, wash primers and solvents in use and in storage. The file shall include a material safety data sheet or product data sheet for each material showing the material name, manufacturer's name, VOC content as applied, specific mixing instructions and density. [District Rule 4607] Federally Enforceable Through Title V Permit

19. The operator shall record, on a monthly basis, the type and amount of all inks used according to one of the following methods; (1) group the quantity of all inks used and identify the maximum VOC content and use the maximum density of 1,010 g/l (8.44 lb/gal), (2) report process inks and pantone inks separately and use specific VOC content and density values for each process ink, and the highest VOC content and the maximum density of 1,010 g/l (8.44 lb/gal) for pantone inks or, (3) report process inks and pantone inks separately and use the maximum VOC content and minimum density value for both process and pantone inks, or use the density of 1,010 g/l (8.44 lb/gal) for pantone inks or, (4) itemize each ink and pantone ink and use the specific VOC content and density value for each. [District Rule 4607] Federally Enforceable Through Title V Permit

20. The operator shall record, on a monthly basis, the type and amount of each coating, adhesive, wash primer and solvent (including cleaning solvents) used. [District Rule 4607] Federally Enforceable Through Title V Permit

21. The operator shall record, on a monthly basis, the type, amount and percent VOC by volume of each fountain solution used. [District Rule 4607] Federally Enforceable Through Title V Permit

22. The operator shall record, on a daily basis, the type and amount of each specialty ink (as defined in Rule 4607) used. [District Rule 4607] Federally Enforceable Through Title V Permit

23. A record of the facility-wide VOC emissions, on a rolling 12-month basis, shall be kept. The records shall be updated at least monthly. [District Rule 2201] Federally Enforceable Through Title V Permit
24. The operator shall maintain records of the emissions of each individual HAP and of the combined HAP emissions. The records shall be kept on a rolling 12-month basis and shall be updated at least monthly. District approved estimating techniques shall be used to determine the HAP emissions. The monthly records shall include records of all required measurements and calculations necessary to demonstrate compliance, including the mass of all HAP containing materials used and the mass fraction of each HAP present in each HAP containing material. [District Rule 4002 and 40 CFR Part 63 Subpart KK] Federally Enforceable Through Title V Permit

25. All records shall be maintained for a period of at least five years and shall be made available to the District, ARB and EPA upon request. [District Rules 2201 and 4607] Federally Enforceable Through Title V Permit
San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: N-3852-15-1

EQUIPMENT DESCRIPTION:
GRAPHIC ARTS PRINTING OPERATION CONSISTING OF A 26 INCH POMC "EVOLUTION" 9-COLOR
FLEXOGRAPHIC PRINTING AND DIE CUTTING PRESS

PERMIT UNIT REQUIREMENTS

1. [98] No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

2. The facility-wide VOC emissions, on a rolling 12-month basis, shall be less than 50,000 pounds. [District Rule 2201] Federally Enforceable Through Title V Permit

3. The VOC emissions shall not exceed 27.0 pounds in any one day and 9,828 pounds during rolling 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit

4. The facility-wide emissions of hazardous air pollutants (HAPs) shall not exceed 10 tons in any rolling 12-month period of any single HAP (as defined in 40 CFR 63.2) and 25 tons in any rolling 12-month period of any combination of HAPs. [District Rule 4002 and 40 CFR Part 63 Subpart KK] Federally Enforceable Through Title V Permit

5. This press shall be utilized only for printing onto low porosity materials. [District Rule 2201] Federally Enforceable Through Title V Permit

6. The VOC content of the inks applied utilizing this press shall not exceed 2.4 lb/gal, less water and exempt compounds. [District Rules 2201 and 4607] Federally Enforceable Through Title V Permit

7. The VOC content of graphic arts materials shall not exceed the following limits: coatings; 300 g/l (2.5 lb/gal), adhesives; 150 g/l (1.25 lb/gal). These VOC content limits are in g/l or lb/gal less water and exempt compounds, as applied. [District Rule 4607] Federally Enforceable Through Title V Permit

8. The use of specialty inks, as defined in District Rule 4607, shall not exceed 2 gallons in a calendar day and 120 gallons in a calendar year. [District Rule 4607] Federally Enforceable Through Title V Permit

9. Except during the cleaning of specialty ink application equipment, the VOC content of solvents shall not exceed 25 g/l (0.21 lb/gal). [District Rule 4607] Federally Enforceable Through Title V Permit

10. If using solvents with VOC contents in excess of 25 g/l (0.21 lb/gal) to clean specialty ink application equipment, cleaning shall be performed utilizing only the following methods: (1) wipe cleaning or, (2) application of solvent from hand-held 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 that 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 it 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

Facility Name: LABEL TECHNOLOGY, INC.
Location: 2050 WARDROBE AVE, MERced, CA 95340
N-3852-15-1: Am 10 2013 @5AM - BCONDA

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.
11. Solvent shall not be atomized into the open air unless it is vented to a VOC control device that complies with section 5.6 of District Rule 4607. This provision shall not apply to printing operations where roller or blanket wash is applied automatically and the cleaning of nozzle tips of automated spray equipment systems, except for robotic systems, and cleaning with spray bottles or containers from which the solvents are dispensed with a propellant-induced force. [District Rule 4607] Federally Enforceable Through Title V Permit

12. The operator shall store and dispose of fresh and spent solvents, waste solvent cleaning materials, coatings, adhesives, catalysts, thinners and inks in closed, non-absorbent, non-leaking, self-closing containers. The containers shall remain closed at all times except when depositing or removing their contents or when they are empty. [District Rules 4607 and 4653] Federally Enforceable Through Title V Permit

13. The operator shall keep mixing containers for VOC-containing adhesives and process-related waste materials closed at all times except when depositing or removing these materials. [District Rule 4653] Federally Enforceable Through Title V Permit

14. The operator shall minimize spills of VOC containing adhesive products and process-related waste. [District Rule 4653] Federally Enforceable Through Title V Permit

15. The operator shall convey VOC containing adhesive products and process-related waste materials from one location to another in closed containers or pipes. [District Rule 4653] Federally Enforceable Through Title V Permit

16. Coatings shall be applied utilizing only the following types of equipment (as defined in Rule 4607): flow coaters, roll coaters, dip coaters, foam coaters, die coaters and hand applicators. [District Rules 2201 and 4607] Federally Enforceable Through Title V Permit

17. The operator 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

18. The operator shall maintain a current file documenting the coatings, inks, adhesives, fountain solutions, wash primers and solvents in use and in storage. The file shall include a material safety data sheet or product data sheet for each material showing the material name, manufacturer's name, VOC content as applied, specific mixing instructions and density. [District Rule 4607] Federally Enforceable Through Title V Permit

19. The operator shall record, on a monthly basis, the type and amount of all inks used according to one of the following methods; (1) group the quantity of all inks used and identify the maximum VOC content and use the maximum density of 1,010 g/l (8.44 lb/gal), (2) report process inks and pantone inks separately and use specific VOC content and density values for each process ink, and the highest VOC content and the maximum density of 1,010 g/l (8.44 lb/gal) for pantone inks or, (3) report process inks and pantone inks separately and use the maximum VOC content and minimum density value for both process and pantone inks, or use the density of 1,010 g/l (8.44 lb/gal) for pantone inks or, (4) itemize each ink and pantone ink and use the specific VOC content and density value for each. [District Rule 4607] Federally Enforceable Through Title V Permit

20. The operator shall record, on a monthly basis, the type and amount of each coating, adhesive, wash primer and solvent (including cleaning solvents) used. [District Rule 4607] Federally Enforceable Through Title V Permit

21. The operator shall record, on a monthly basis, the type, amount and percent VOC by volume of each fountain solution used. [District Rule 4607] Federally Enforceable Through Title V Permit

22. The operator shall record, on a daily basis, the type and amount of each specialty ink (as defined in Rule 4607) used. [District Rule 4607] Federally Enforceable Through Title V Permit

23. A record of the facility-wide VOC emissions, on a rolling 12-month basis, shall be kept. The records shall be updated at least monthly. [District Rule 2201] Federally Enforceable Through Title V Permit

24. A record of the VOC emissions from this unit, on a rolling 12-month basis, shall be kept. [District Rule 2201]
25. The operator shall maintain records of the emissions of each individual HAP and of the combined HAP emissions. The records shall be kept on a rolling 12-month basis and shall be updated at least monthly. District approved estimating techniques shall be used to determine the HAP emissions. The monthly records shall include records of all required measurements and calculations necessary to demonstrate compliance, including the mass of all HAP containing materials used and the mass fraction of each HAP present in each HAP containing material. [District Rule 4002 and 40 CFR Part 63 Subpart KK] Federally Enforceable Through Title V Permit

26. All records shall be maintained for a period of at least five years and shall be made available to the District, ARB and EPA upon request. [District Rules 2201 and 4607] Federally Enforceable Through Title V Permit
San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: N-3852-16-2

EQUIPMENT DESCRIPTION:
GRAPHIC ARTS PRINTING OPERATION CONSISTING OF A MARK ANDY MODEL #LP3430-17 10-COLOR FLEXOGRAPHIC PRINTING AND DIE CUTTING PRESS

PERMIT UNIT REQUIREMENTS

1. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

2. The facility-wide VOC emissions, on a rolling 12-month basis, shall be less than 50,000 pounds. [District Rule 2201] Federally Enforceable Through Title V Permit

3. The VOC emissions shall not exceed 27.0 pounds in any one day and 9,855 pounds during rolling 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit

4. The facility-wide emissions of hazardous air pollutants (HAPs) shall not exceed 10 tons in any rolling 12-month period of any single HAP (as defined in 40 CFR 63.2) and 25 tons in any rolling 12-month period of any combination of HAPs. [District Rule 4002 and 40 CFR Part 63 Subpart KK] Federally Enforceable Through Title V Permit

5. This press shall be utilized only for printing onto low porosity materials. [District Rule 2201] Federally Enforceable Through Title V Permit

6. The VOC content of the inks applied utilizing this press shall not exceed 2.4 lb/gal, less water and exempt compounds. [District Rules 2201 and 4607] Federally Enforceable Through Title V Permit

7. The VOC content of graphic arts materials shall not exceed the following limits: coatings; 300 g/l (2.5 lb/gal), adhesives; 150 g/l (1.25 lb/gal). These VOC content limits are in g/l or lb/gal less water and exempt compounds, as applied. [District Rule 4607] Federally Enforceable Through Title V Permit

8. The use of specialty inks, as defined in District Rule 4607, shall not exceed 2 gallons in a calendar day and 120 gallons in a calendar year. [District Rule 4607] Federally Enforceable Through Title V Permit

9. Except during the cleaning of specialty ink application equipment, the VOC content of solvents shall not exceed 25 g/l (0.21 lb/gal). [District Rule 4607] Federally Enforceable Through Title V Permit

10. If using solvents with VOC contents in excess of 25 g/l (0.21 lb/gal) to clean specialty ink application equipment, cleaning shall be performed utilizing only the following methods: (1) wipe cleaning or, (2) application of solvent from hand-held 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 that 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 it 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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.
11. Solvent shall not be atomized into the open air unless it is vented to a VOC control device that complies with section 5.6 of District Rule 4607. This provision shall not apply to printing operations where roller or blanket wash is applied automatically and the cleaning of nozzle tips of automated spray equipment systems, except for robotic systems, and cleaning with spray bottles or containers from which the solvents are dispensed with a propellant-induced force. [District Rule 4607] Federally Enforceable Through Title V Permit

12. The operator shall store and dispose of fresh and spent solvents, waste solvent cleaning materials, coatings, adhesives, catalysts, thinners and inks in closed, non-absorbent, non-leaking, self closing containers. The containers shall remain closed at all times except when depositing or removing their contents or when they are empty. [District Rules 4607 and 4653] Federally Enforceable Through Title V Permit

13. The operator shall keep mixing containers for VOC-containing adhesives and process-related waste materials closed at all times except when depositing or removing these materials. [District Rule 4653] Federally Enforceable Through Title V Permit

14. The operator shall minimize spills of VOC containing adhesive products and process-related waste. [District Rule 4653] Federally Enforceable Through Title V Permit

15. The operator shall convey VOC containing adhesive products and process-related waste materials from one location to another in closed containers or pipes. [District Rule 4653] Federally Enforceable Through Title V Permit

16. Coatings shall be applied utilizing only the following types of equipment (as defined in Rule 4607): flow coaters, roll coaters, dip coaters, foam coaters, die coaters and hand applicators. [District Rules 2201 and 4607] Federally Enforceable Through Title V Permit

17. The operator 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

18. The operator shall maintain a current file documenting the coatings, inks, adhesives, fountain solutions, wash primers and solvents in use and in storage. The file shall include a material safety data sheet or product data sheet for each material showing the material name, manufacturer’s name, VOC content as applied, specific mixing instructions and density. [District Rule 4607] Federally Enforceable Through Title V Permit

19. The operator shall record, on a monthly basis, the type and amount of all inks used according to one of the following methods; (1) group the quantity of all inks used and identify the maximum VOC content and use the maximum density of 1,010 g/l (8.44 lb/gal), (2) report process inks and pantone inks separately and use specific VOC content and density values for each process ink, and the highest VOC content and the maximum density of 1,010 g/l (8.44 lb/gal) for pantone inks or, (3) report process inks and pantone inks separately and use the maximum VOC content and minimum density value for both process and pantone inks, or use the density of 1,010 g/l (8.44 lb/gal) for pantone inks or, (4) itemize each ink and pantone ink and use the specific VOC content and density value for each. [District Rule 4607] Federally Enforceable Through Title V Permit

20. The operator shall record, on a monthly basis, the type and amount of each coating, adhesive, wash primer and solvent (including cleaning solvents) used. [District Rule 4607] Federally Enforceable Through Title V Permit

21. The operator shall record, on a monthly basis, the type, amount and percent VOC by volume of each fountain solution used. [District Rule 4607] Federally Enforceable Through Title V Permit

22. The operator shall record, on a daily basis, the type and amount of each specialty ink (as defined in Rule 4607) used. [District Rule 4607] Federally Enforceable Through Title V Permit

23. A record of the facility-wide VOC emissions, on a rolling 12-month basis, shall be kept. The records shall be updated at least monthly. [District Rule 2201] Federally Enforceable Through Title V Permit

24. A record of the VOC emissions from this unit, on a rolling 12-month basis, shall be kept. [District Rule 2201]
25. The operator shall maintain records of the emissions of each individual HAP and of the combined HAP emissions. The records shall be kept on a rolling 12-month basis and shall be updated at least monthly. District approved estimating techniques shall be used to determine the HAP emissions. The monthly records shall include records of all required measurements and calculations necessary to demonstrate compliance, including the mass of all HAP containing materials used and the mass fraction of each HAP present in each HAP containing material. [District Rule 4002 and 40 CFR Part 63 Subpart KK] Federally Enforceable Through Title V Permit

26. All records shall be maintained for a period of at least five years and shall be made available to the District, ARB and EPA upon request. [District Rules 2201 and 4607] Federally Enforceable Through Title V Permit
San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: N-3852-17-1

EQUIPMENT DESCRIPTION:
GRAPHIC ARTS OPERATION CONSISTING OF A 30 INCH DRI-TEC LAMINATOR (LAMINATOR IS EQUIPPED WITH A PERMIT EXEMPT NATURAL GAS FIRED HEATING UNIT (RULE 2020 SECTION 6.6.1))

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. The facility-wide VOC emissions, on a rolling 12-month basis, shall be less than 50,000 pounds. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The VOC emissions shall not exceed 0.7 pound during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The facility-wide emissions of hazardous air pollutants (HAPs) shall not exceed 10 tons in any rolling 12-month period of any single HAP (as defined in 40 CFR 63.2) and 25 tons in any rolling 12-month period of any combination of HAPs. [District Rule 4002 and 40 CFR Part 63 Subpart KK] Federally Enforceable Through Title V Permit
5. The VOC content of graphic arts materials shall not exceed any of the following limits: inks for porous substrates, 225 g/l (1.88 lb/gal), all other inks, 300 g/l (2.5 lb/gal), coatings, 300 g/l (2.5 lb/gal), adhesives, 150 g/l (1.25 lb/gal). These VOC content limits are in g/l or lb/gal less water and exempt compounds, as applied. [District Rule 4607] Federally Enforceable Through Title V Permit
6. The VOC content of specialty inks shall not exceed 300 g/l (2.5 lb/gal) less water and exempt compounds, as applied. [District Rule 4607] Federally Enforceable Through Title V Permit
7. The use of specialty inks, as defined in District Rule 4607, shall not exceed 2 gallons in a calendar day and 120 gallons in a calendar year. [District Rule 4607] Federally Enforceable Through Title V Permit
8. Except during the cleaning of specialty ink application equipment, the VOC content of solvents shall not exceed 25 g/l (0.21 lb/gal). [District Rule 4607] Federally Enforceable Through Title V Permit
9. If using solvents with VOC contents in excess of 25 g/l (0.21 lb/gal) to clean specialty ink application equipment, cleaning shall be performed utilizing only the following methods: (1) wipe cleaning or, (2) application of solvent from hand-held 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 that 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 it 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
10. Solvent shall not be atomized into the open air unless it is vented to a VOC control device that complies with section 5.6 of District Rule 4607. This provision shall not apply to printing operations where roller or blanket wash is applied automatically and the cleaning of nozzle tips of automated spray equipment systems, except for robotic systems, and cleaning with spray bottles or containers from which the solvents are dispensed with a propellant-induced force. [District Rule 4607] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate
11. The operator shall store and dispose of fresh and spent solvents, waste solvent cleaning materials, coatings, adhesives, catalysts, thinners and inks in closed, non-absorbent, non-leaking, self-closing containers. The containers shall remain closed at all times except when depositing or removing their contents or when they are empty. [District Rules 4607 and 4653] Federally Enforceable Through Title V Permit

12. The operator shall keep mixing containers for VOC-containing adhesives and process-related waste materials closed at all times except when depositing or removing these materials. [District Rule 4653] Federally Enforceable Through Title V Permit

13. The operator shall minimize spills of VOC containing adhesive products and process-related waste. [District Rule 4653] Federally Enforceable Through Title V Permit

14. The operator shall convey VOC containing adhesive products and process-related waste materials from one location to another in closed containers or pipes. [District Rule 4653] Federally Enforceable Through Title V Permit

15. Coatings shall be applied utilizing only the following types of equipment (as defined in Rule 4607): flow coaters, roll coaters, dip coaters, foam coaters, die coaters and hand applicators. [District Rules 2201 and 4607] Federally Enforceable Through Title V Permit

16. The operator 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

17. The operator shall maintain a current file documenting the coatings, inks, adhesives, fountain solutions, wash primers and solvents in use and in storage. The file shall include a material safety data sheet or product data sheet showing the material name, manufacturer's name, VOC content as applied, specific mixing instructions and density. [District Rule 4607] Federally Enforceable Through Title V Permit

18. The operator shall record, on a monthly basis, the type and amount of all inks used according to one of the following methods; (1) group the quantity of all inks used and identify the maximum VOC content and use the maximum density of 1,010 g/l (8.44 lb/gal), (2) report process inks and pantone inks separately and use specific VOC content and density values for each process ink, and the highest VOC content and the maximum density of 1,010 g/l (8.44 lb/gal) for pantone inks or, (3) report process inks and pantone inks separately and use the maximum VOC content and minimum density value for both process and pantone inks, or use the density of 1,010 g/l (8.44 lb/gal) for pantone inks or, (4) itemize each ink and pantone ink and use the specific VOC content and density value for each. [District Rule 4607] Federally Enforceable Through Title V Permit

19. The operator shall record, on a monthly basis, the type and amount of each coating, adhesive, wash primer and solvent (including cleaning solvents) used. [District Rule 4607] Federally Enforceable Through Title V Permit

20. The operator shall record, on a monthly basis, the type, amount and percent VOC by volume of each fountain solution used. [District Rule 4607] Federally Enforceable Through Title V Permit

21. The operator shall record, on a daily basis, the type and amount of each specialty ink (as defined in Rule 4607) used. [District Rule 4607] Federally Enforceable Through Title V Permit

22. A record of the facility-wide VOC emissions, on a rolling 12-month basis, shall be kept. The records shall be updated at least monthly. [District Rule 2201] Federally Enforceable Through Title V Permit

23. The operator shall maintain records of the emissions of each individual HAP and of the combined HAP emissions. The records shall be kept on a rolling 12-month basis and shall be updated at least monthly. District approved estimating techniques shall be used to determine the HAP emissions. The monthly records shall include records of all required measurements and calculations necessary to demonstrate compliance, including the mass of all HAP containing materials used and the mass fraction of each HAP present in each HAP containing material. [District Rule 4002 and 40 CFR Part 63 Subpart KK] Federally Enforceable Through Title V Permit

24. All records shall be maintained for a period of at least five years and shall be made available to the District, ARB and EPA upon request. [District Rules 2201 and 4607] Federally Enforceable Through Title V Permit
PERMIT UNIT REQUIREMENTS

1. (98) No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

2. The facility-wide VOC emissions, on a rolling 12-month basis, shall be less than 50,000 pounds. [District Rule 2201] Federally Enforceable Through Title V Permit

3. The VOC emissions shall not exceed 40.0 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit

4. The facility-wide emissions of hazardous air pollutants (HAPs) shall not exceed 10 tons in any rolling 12-month period of any single HAP (as defined in 40 CFR 63.2) and 25 tons in any rolling 12-month period of any combination of HAPs. [District Rule 4002 and 40 CFR Part 63 Subpart KK] Federally Enforceable Through Title V Permit

5. This press shall be utilized only for printing onto low porosity materials. [District Rule 2201] Federally Enforceable Through Title V Permit

6. The VOC content of the inks applied utilizing this press shall not exceed 2.4 lb/gal. less water and exempt compounds. [District Rules 2201 and 4607] Federally Enforceable Through Title V Permit

7. The VOC content of graphic arts materials shall not exceed the following limits: coatings; 300 g/l (2.5 lb/gal), adhesives; 150 g/l (1.25 lb/gal). These VOC content limits are in g/l or lb/gal less water and exempt compounds, as applied. [District Rule 4607] Federally Enforceable Through Title V Permit

8. The use of specialty inks, as defined in District Rule 4607, shall not exceed 2 gallons in a calendar day and 120 gallons in a calendar year. [District Rule 4607] Federally Enforceable Through Title V Permit

9. Except during the cleaning of specialty ink application equipment, the VOC content of solvents shall not exceed 25 g/l (0.21 lb/gal). [District Rule 4607] Federally Enforceable Through Title V Permit

10. If using solvents with VOC contents in excess of 25 g/l (0.21 lb/gal) to clean specialty ink application equipment, cleaning shall be performed utilizing only the following methods: (1) wipe cleaning or, (2) application of solvent from hand-held 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 that 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 it 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
Solvent shall not be atomized into the open air unless it is vented to a VOC control device that complies with section 5.6 of District Rule 4607. This provision shall not apply to printing operations where roller or blanket wash is applied automatically and the cleaning of nozzle tips of automated spray equipment systems, except for robotic systems, and cleaning with spray bottles or containers from which the solvents are dispensed with a propellant-induced force. [District Rule 4607] Federally Enforceable Through Title V Permit

12. The operator shall store and dispose of fresh and spent solvents, waste solvent cleaning materials, coatings, adhesives, catalysts, thinners and inks in closed, non-absorbent, non-leaking, self-closing containers. The containers shall remain closed at all times except when depositing or removing their contents or when they are empty. [District Rules 4607 and 4653] Federally Enforceable Through Title V Permit

13. The operator shall keep mixing containers for VOC-containing adhesives and process-related waste materials closed at all times except when depositing or removing these materials. [District Rule 4653] Federally Enforceable Through Title V Permit

14. The operator shall minimize spills of VOC containing adhesive products and process-related waste. [District Rule 4653] Federally Enforceable Through Title V Permit

15. The operator shall convey VOC containing adhesive products and process-related waste materials from one location to another in closed containers or pipes. [District Rule 4653] Federally Enforceable Through Title V Permit

16. Coatings shall be applied utilizing only the following types of equipment (as defined in Rule 4607): flow coaters, roll coaters, dip coaters, foam coaters, die coaters and hand applicators. [District Rules 2201 and 4607] Federally Enforceable Through Title V Permit

17. The operator 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 4677] Federally Enforceable Through Title V Permit

18. The operator shall maintain a current file documenting the coatings, inks, adhesives, fountain solutions, wash primers and solvents in use and in storage. The file shall include a material safety data sheet or product data sheet for each material showing the material name, manufacturer’s name, VOC content as applied, specific mixing instructions and density. [District Rule 4607] Federally Enforceable Through Title V Permit

19. The operator shall record, on a monthly basis, the type and amount of all inks used according to one of the following methods: (1) group the quantity of all inks used and identify the maximum VOC content and use the maximum density of 1.010 g/l (8.44 lb/gal), (2) report process inks and pantone inks separately and use specific VOC content and density values for each process ink, and the highest VOC content and the maximum density of 1.010 g/l (8.44 lb/gal) for pantone inks or, (3) report process inks and pantone inks separately and use the maximum VOC content and minimum density values for both process and pantone inks, or use the density of 1.010 g/l (8.44 lb/gal) for pantone inks or, (4) itemize each ink and pantone ink and use the specific VOC content and density value for each. [District Rule 4607] Federally Enforceable Through Title V Permit

20. The operator shall record, on a monthly basis, the type and amount of each coating, adhesive, wash primer and solvent (including cleaning solvents) used. [District Rule 4607] Federally Enforceable Through Title V Permit

21. The operator shall record, on a monthly basis, the type, amount and percent VOC by volume of each fountain solution used. [District Rule 4607] Federally Enforceable Through Title V Permit

22. The operator shall record, on a daily basis, the type and amount of each specialty ink (as defined in Rule 4607) used. [District Rule 4607] Federally Enforceable Through Title V Permit

23. A record of the facility-wide VOC emissions, on a rolling 12-month basis, shall be kept. The records shall be updated at least monthly. [District Rule 2201] Federally Enforceable Through Title V Permit
24. The operator shall maintain records of the emissions of each individual HAP and of the combined HAP emissions. The records shall be kept on a rolling 12-month basis and shall be updated at least monthly. District approved estimating techniques shall be used to determine the HAP emissions. The monthly records shall include records of all required measurements and calculations necessary to demonstrate compliance, including the mass of all HAP containing materials used and the mass fraction of each HAP present in each HAP containing material. [District Rule 4062 and 40 CFR Part 63 Subpart KK] Federally Enforceable Through Title V Permit

25. All records shall be maintained for a period of at least five years and shall be made available to the District, ARB and EPA upon request. [District Rules 2201 and 4607] Federally Enforceable Through Title V Permit
San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: N-3652-19-1

EXPIRATION DATE: 10/31/2017

EQUIPMENT DESCRIPTION:
FLEXOGRAPHIC PRINTING PLATE MANUFACTURING OPERATION CONSISTING OF A NYOFLEX COMBI IIII
EXPOSURE UNIT, A NYOFLEX FLOWLINE IIII WASHER UNIT, AND AN ELECTRIC DRYING OVEN

PERMIT UNIT REQUIREMENTS

1. [76] No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

2. The facility-wide VOC emissions, on a rolling 12-month basis, shall be less than 50,000 pounds. [District Rule 2201] Federally Enforceable Through Title V Permit

3. The plate manufacturing throughput shall not exceed 120 square feet of photopolymer sheets processed in any one day. [District Rules 2201 and 4661] Federally Enforceable Through Title V Permit

4. VOC emissions from the plate manufacturing operation shall not exceed 0.023 lb-VOC/square foot of photopolymer sheets processed. [District Rules 2201 and 4661] Federally Enforceable Through Title V Permit

5. The facility-wide emissions of hazardous air pollutants (HAPs) shall not exceed 10 tons in any rolling 12-month period of any single HAP (as defined in 40 CFR 63.2) and 25 tons in any rolling 12-month period of any combination of HAPs. [District Rule 4002 and 40 CFR Part 63 Subpart KK] Federally Enforceable Through Title V Permit

6. The VOC content of the processor solvent shall not exceed 7.3 pounds per gallon, less water and exempt compounds. [District Rule 2201] Federally Enforceable Through Title V Permit

7. All solvents, not in active use, shall be stored in closed containers. Solvent laden cloth or paper shall be stored and disposed in closed non-absorbent containers. [District Rules 2201 and 4661] Federally Enforceable Through Title V Permit

8. Permittee shall keep a daily record of the quantity of photopolymer sheets processed, in square feet. [District Rule 2201] Federally Enforceable Through Title V Permit

9. Permittee shall keep records of the VOC content of the processor solvents used. The record shall include the product ID and the VOC content, less water and exempt compounds. [District Rule 2201] Federally Enforceable Through Title V Permit

10. The operator shall keep a list of materials that provides all of the data necessary to evaluate compliance with this rule, including: (1) specific manufacturer's name of each solvent containing material, including solvents, catalysts and thinners, (2) VOC content of each solvent containing material as used, in g/l or lb/gal. [District Rule 4661] Federally Enforceable Through Title V Permit

11. The operator shall keep daily usage records that include the following information: (1) material name, (2) volume of material used (gallons), (3) specific solvents, catalysts and thinners added to the materials, (4) volume of each solvent, catalyst and thinner added (gallons), (5) when the material is a mixture of different materials that are blended by the operator, the mix ratio of the batch shall be recorded and the VOC content of the batch shall be calculated and recorded in order to determine compliance with the VOC emission limits. [District Rule 4661] Federally Enforceable Through Title V Permit

12. A record of the facility-wide VOC emissions, on a rolling 12-month basis, shall be kept. The records shall be updated at least monthly. [District Rule 2201] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.
13. The operator shall maintain records of the emissions of each individual HAP and of the combined HAP emissions. The records shall be kept on a rolling 12-month basis and shall be updated at least monthly. District approved estimating techniques shall be used to determine the HAP emissions. The monthly records shall include records of all required measurements and calculations necessary to demonstrate compliance, including the mass of all HAP containing materials used and the mass fraction of each HAP present in each HAP containing material. [District Rule 4002 and 40 CFR Part 63 Subpart KK] Federally Enforceable Through Title V Permit

14. 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 2201 and 4661] Federally Enforceable Through Title V Permit
PERMIT UNIT REQUIREMENTS

1. (98) No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

2. The facility-wide VOC emissions, on a rolling 12-month basis, shall be less than 50,000 pounds. [District Rule 2201] Federally Enforceable Through Title V Permit

3. The VOC emissions shall not exceed 4.9 pounds in any one day and 419 pounds during rolling 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit

4. The facility-wide emissions of hazardous air pollutants (HAPs) shall not exceed 10 tons in any rolling 12-month period of any single HAP (as defined in 40 CFR 63.2) and 25 tons in any rolling 12-month period of any combination of HAPs. [District Rule 4002 and 40 CFR Part 63 Subpart KK] Federally Enforceable Through Title V Permit

5. This press shall be utilized only for printing onto low porosity materials. [District Rule 2201] Federally Enforceable Through Title V Permit

6. The VOC content of the inks applied utilizing this press shall not exceed 2.4 lb/gal, less water and exempt compounds. [District Rules 2201 and 4607] Federally Enforceable Through Title V Permit

7. The VOC content of graphic arts materials shall not exceed the following limits: coatings; 300 g/l (2.5 lb/gal), adhesives; 150 g/l (1.25 lb/gal). These VOC content limits are in g/l or lb/gal less water and exempt compounds, as applied. [District Rule 4607] Federally Enforceable Through Title V Permit

8. The use of specialty inks, as defined in District Rule 4607, shall not exceed 2 gallons in a calendar day and 120 gallons in a calendar year. [District Rule 4607] Federally Enforceable Through Title V Permit

9. Except during the cleaning of specialty ink application equipment, the VOC content of solvents shall not exceed 25 g/l (0.21 lb/gal). [District Rule 4607] Federally Enforceable Through Title V Permit

10. If using solvents with VOC contents in excess of 25 g/l (0.21 lb/gal) to clean specialty ink application equipment, cleaning shall be performed utilizing only the following methods: (1) wipe cleaning or, (2) application of solvent from hand-held 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 that 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 it 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

DRAFT
11. Solvent shall not be atomized into the open air unless it is vented to a VOC control device that complies with section 5.6 of District Rule 4607. This provision shall not apply to printing operations where roller or blanket wash is applied automatically and the cleaning of nozzle tips of automated spray equipment systems, except for robotic systems, and cleaning with spray bottles or containers from which the solvents are dispensed with a propellant-induced force. [District Rule 4607] Federally Enforceable Through Title V Permit

12. The operator shall store and dispose of fresh and spent solvents, waste solvent cleaning materials, coatings, adhesives, catalysts, thinners and inks in closed, non-absorbing, non-leaking, self-closing containers. The containers shall remain closed at all times except when depositing or removing their contents or when they are empty. [District Rules 4607 and 4653] Federally Enforceable Through Title V Permit

13. The operator shall keep mixing containers for VOC-containing adhesives and process-related waste materials closed at all times except when depositing or removing these materials. [District Rule 4653] Federally Enforceable Through Title V Permit

14. The operator shall minimize spills of VOC containing adhesive products and process-related waste. [District Rule 4653] Federally Enforceable Through Title V Permit

15. The operator shall convey VOC containing adhesive products and process-related waste materials from one location to another in closed containers or pipes. [District Rule 4653] Federally Enforceable Through Title V Permit

16. Coatings shall be applied utilizing only the following types of equipment (as defined in Rule 4607); flow coaters, roll coaters, dip coaters, foam coaters, die coaters and hand applicators. [District Rules 2201 and 4607] Federally Enforceable Through Title V Permit

17. The operator 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

18. The operator shall maintain a current file documenting the coatings, inks, adhesives, fountain solutions, wash primers and solvents in use and in storage. The file shall include a material safety data sheet or product data sheet for each material showing the material name, manufacturer’s name, VOC content as applied, specific mixing instructions and density. [District Rule 4607] Federally Enforceable Through Title V Permit

19. The operator shall record, on a monthly basis, the type and amount of all inks used according to one of the following methods; (1) group the quantity of all inks used and identify the maximum VOC content and use the maximum density of 1,010 g/l (8.44 lb/gal), (2) report process inks and pantone inks separately and use specific VOC content and density values for each process ink, and the highest VOC content and the maximum density of 1,010 g/l (8.44 lb/gal) for pantone inks or, (3) report process inks and pantone inks separately and use the maximum VOC content and minimum density value for both process and pantone inks, or use the density of 1,010 g/l (8.44 lb/gal) for pantone inks or, (4) itemize each ink and pantone ink and use the specific VOC content and density value for each. [District Rule 4607] Federally Enforceable Through Title V Permit

20. The operator shall record, on a monthly basis, the type and amount of each coating, adhesive, wash primer and solvent (including cleaning solvents) used. [District Rule 4607] Federally Enforceable Through Title V Permit

21. The operator shall record, on a monthly basis, the type, amount and percent VOC by volume of each fountain solution used. [District Rule 4607] Federally Enforceable Through Title V Permit

22. The operator shall record, on a daily basis, the type and amount of each specialty ink (as defined in Rule 4607) used. [District Rule 4607] Federally Enforceable Through Title V Permit

23. A record of the facility-wide VOC emissions, on a rolling 12-month basis, shall be kept. The records shall be updated at least monthly. [District Rule 2201] Federally Enforceable Through Title V Permit

24. A record of the VOC emissions from this unit, on a rolling 12-month basis, shall be kept. [District Rule 2201]
25. The operator shall maintain records of the emissions of each individual HAP and of the combined HAP emissions. The records shall be kept on a rolling 12-month basis and shall be updated at least monthly. District-approved estimating techniques shall be used to determine the HAP emissions. The monthly records shall include records of all required measurements and calculations necessary to demonstrate compliance, including the mass of all HAP containing materials used and the mass fraction of each HAP present in each HAP containing material. [District Rule 4002 and 40 CFR Part 63 Subpart KK] Federally Enforceable Through Title V Permit

26. All records shall be maintained for a period of at least five years and shall be made available to the District, ARB and EPA upon request. [District Rules 2201 and 4607] Federally Enforceable Through Title V Permit
Appendix B
Detailed Facility List
<table>
<thead>
<tr>
<th>PERMIT NUMBER</th>
<th>FEE DESCRIPTION</th>
<th>FEE RULE</th>
<th>QTY</th>
<th>FEE AMOUNT</th>
<th>FEE TOTAL</th>
<th>PERMIT STATUS</th>
<th>EQUIPMENT DESCRIPTION</th>
</tr>
</thead>
<tbody>
<tr>
<td>N-3852-1-4</td>
<td>19 BHP</td>
<td>3020-01 A</td>
<td>1</td>
<td>87.00</td>
<td>87.00</td>
<td>A</td>
<td>GRAPHIC ARTS PRINTING OPERATION CONSISTING OF A ROTOPRESS MODEL 2002 10 INCH 8-COLOR FLEXOGRAPHIC PRINTING PRESS</td>
</tr>
<tr>
<td>N-3852-2-4</td>
<td>19 BHP</td>
<td>3020-01 A</td>
<td>1</td>
<td>87.00</td>
<td>87.00</td>
<td>A</td>
<td>GRAPHIC ARTS PRINTING OPERATION CONSISTING OF A ROTOPRESS MODEL 4002 10 INCH 4-COLOR FLEXOGRAPHIC PRINTING PRESS</td>
</tr>
<tr>
<td>N-3852-9-2</td>
<td>25 BHP</td>
<td>3020-01 A</td>
<td>1</td>
<td>87.00</td>
<td>87.00</td>
<td>A</td>
<td>GRAPHIC ARTS OPERATION CONSISTING OF A ROTOPRESS 10 INCH 8-COLOR FLEXOGRAPHIC PRESS</td>
</tr>
<tr>
<td>N-3852-13-1</td>
<td>25 BHP</td>
<td>3020-01 A</td>
<td>1</td>
<td>87.00</td>
<td>87.00</td>
<td>A</td>
<td>GRAPHIC ARTS PRINTING OPERATION CONSISTING OF A MARK ANDY MODEL 4150 9-COLOR FLEXOGRAPHIC PRINTING PRESS (PRESS IS EQUIPPED WITH PERMIT EXEMPT ELECTRICAL DRYERS)</td>
</tr>
<tr>
<td>N-3852-14-1</td>
<td>22.75 BHP</td>
<td>3020-01 A</td>
<td>1</td>
<td>87.00</td>
<td>87.00</td>
<td>A</td>
<td>GRAPHIC ARTS PRINTING OPERATION CONSISTING OF A ROTOPRESS MODEL 3516 9-COLOR FLEXOGRAPHIC PRINTING PRESS</td>
</tr>
<tr>
<td>N-3852-15-0</td>
<td>8.5 BHP</td>
<td>3020-01 A</td>
<td>1</td>
<td>87.00</td>
<td>87.00</td>
<td>A</td>
<td>GRAPHIC ARTS OPERATION WITH A PCMC &quot;EVOLUTION&quot; 26 INCH 9-COLOR FLEXOGRAPHIC PRINTING AND DIE CUTTING PRESS</td>
</tr>
<tr>
<td>N-3852-16-1</td>
<td>27.5 BHP</td>
<td>3020-01 B</td>
<td>1</td>
<td>117.00</td>
<td>117.00</td>
<td>A</td>
<td>GRAPHIC ARTS PRINTING OPERATION CONSISTING OF A MARK ANDY MODEL LP3430-17 10-COLOR FLEXOGRAPHIC PRINTING AND DIE CUTTING PRESS</td>
</tr>
<tr>
<td>N-3852-17-0</td>
<td>38 BHP</td>
<td>3020-01 B</td>
<td>1</td>
<td>117.00</td>
<td>117.00</td>
<td>A</td>
<td>GRAPHIC ARTS OPERATION OF A DRI-TEC 30 INCH LAMINATOR (LAMINATOR IS EQUIPPED WITH A PERMIT EXEMPT NATURAL GAS FIRED UNIT (RULE 2020 SECTION 6.6.1))</td>
</tr>
<tr>
<td>N-3852-18-0</td>
<td>75 KVA ELECTRIC DRYERS</td>
<td>3020-03 B</td>
<td>1</td>
<td>117.00</td>
<td>117.00</td>
<td>A</td>
<td>GRAPHIC ARTS OPERATION WITH A MARK ANDY MODEL XP5000-20 10-COLOR FLEXOGRAPHIC LABEL AND TAG PRINTING AND DIE CUTTING PRESS WITH TEN 7.5 KW DRYERS</td>
</tr>
<tr>
<td>N-3852-19-0</td>
<td>29.4 electric HP</td>
<td>3020-01 B</td>
<td>1</td>
<td>117.00</td>
<td>117.00</td>
<td>A</td>
<td>FLEXOGRAPHIC PRINTING PLATE MANUFACTURING OPERATION CONSISTING OF A NYOFLEX COMBI FII EXPOSURE UNIT, A NYOFLEX FLOWLINE FII WASHER UNIT, AND AN ELECTRIC DRYING OVEN</td>
</tr>
<tr>
<td>N-3852-20-0</td>
<td>371 kVA</td>
<td>3020-03 C</td>
<td>1</td>
<td>197.00</td>
<td>197.00</td>
<td>A</td>
<td>GRAPHIC ARTS PRINTING OPERATION CONSISTING OF AN MPS 10-COLOR FLEXOGRAPHIC PRINTING PRESS EQUIPPED WITH ELECTRIC DRYERS</td>
</tr>
</tbody>
</table>

Number of Facilities Reported: 1