

# Bay Area Air Quality Management District

939 Ellis Street  
San Francisco, CA 94109  
(415) 771-6000

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## Proposed

# MAJOR FACILITY REVIEW PERMIT

Issued To:

**Pechiney Plastic Packaging, Inc.**  
**Facility #A0273**

**Facility Address:**

6590 Central Avenue  
Newark CA 94560

**Mailing Address:**

6590 Central Avenue  
Newark CA 94560

### Responsible Official

Tom Brehm, Plant Manager  
(510) 797-3710

### Facility Contact

Jennifer Phelps, Process Engineer  
(510) 797-3710, ext. 357

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**Type of Facility:** Flexible Packaging Manufacturing    BAAQMD Permit Division Contact:  
**Primary SIC:** 2671, 2754    Allan Chiu  
**Product:** Flexible Packaging/Plastic Bottles

**ISSUED BY THE BAY AREA AIR QUALITY MANAGEMENT DISTRICT**

\_\_\_\_\_  
Jack P. Broadbent, Executive Office/Air Pollution Control Officer

\_\_\_\_\_  
Date

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## I. STANDARD CONDITIONS

### A. Administrative Requirements

The permit holder shall comply with all applicable requirements in the following regulations:

- BAAQMD Regulation 1 - General Provisions and Definitions  
(as amended by the District Board on 5/2/01);
- SIP Regulation 1 - General Provisions and Definitions  
(as approved by EPA through 6/28/99);
- BAAQMD Regulation 2, Rule 1 - Permits, General Requirements  
(as amended by the District Board on 8/1/01);
- SIP Regulation 2, Rule 1 - Permits, General Requirements  
(as approved by EPA through 1/26/99);
- BAAQMD Regulation 2, Rule 2 - Permits, New Source Review  
(as amended by the District Board on 5/17/00);
- SIP Regulation 2, Rule 2 - Permits, New Source Review and Prevention of Significant Deterioration  
(as approved by EPA through 1/26/99);
- BAAQMD Regulation 2, Rule 4 - Permits, Emissions Banking  
(as amended by the District Board on 5/17/00);
- SIP Regulation 2, Rule 4 - Permits, Emissions Banking  
(as approved by EPA through 1/26/99); and
- BAAQMD Regulation 2, Rule 6 - Permits, Major Facility Review  
(as amended by the District Board on 5/2/01).

### B. Conditions to Implement Regulation 2, Rule 6, Major Facility Review

1. This Major Facility Review Permit was issued on November 6, 2001, and expires on October 31, 2006. The permit holder shall submit a complete application for renewal of this Major Facility Review Permit no later than April 30, 2006 and no earlier than October 31, 2005. **If a complete application for renewal has not been submitted in accordance with this deadline, the facility may not operate after October 31, 2006.** (Regulation 2-6-307, 404.2, & 409.6; MOP Volume II, Part 3, §4.2)
2. The permit holder shall comply with all conditions of this permit. The permit consists of this document and all appendices. Any non-compliance with the terms and conditions of this permit will constitute a violation of the law and will be grounds for enforcement action; permit termination, revocation and re-issuance, or modification; or denial of a permit renewal application. (Regulation 2-6-307; MOP Volume II, Part 3, §4.11)
3. In the event any enforcement action is brought as a result of a violation of any term or condition of this permit, the fact that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with such term or condition shall not be a defense to such enforcement action. (MOP Volume II, Part 3, §4.11)
4. This permit may be modified, revoked, reopened and reissued, or terminated for cause. (Regulation 2-6-307, 409.8, 415; MOP Volume II, Part 3, §4.11)
5. The filing of a request by the facility for a permit modification, revocation and re-

## **I. Standard Conditions**

- issuance, or termination, or the filing of a notification of planned changes or anticipated non-compliance does not stay the applicability of any permit condition. (Regulation 2-6-409.7; MOP Volume II, Part 3, §4.11)
6. This permit does not convey any property rights of any sort, or any exclusive privilege. (Regulation 2-6-409.7; MOP Volume II, Part 3, §4.11)
  7. The permit holder shall supply within 30 days any information that the District requests in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. (Regulation 1-441, Regulation 2-6-409.4 & 501; MOP Volume II, Part 3, §4.11)
  8. Any records required to be maintained pursuant to this permit that the permittee considers to contain proprietary or trade secret information shall be prominently designated as such. Copies of any such proprietary or trade secret information which are provided to the District shall be maintained by the District in a locked confidential file, provided, however, that requests from the public for the review of any such information shall be handled in accordance with the District's procedures set forth in Section 11 of the District Administrative Code. (Regulation 2-6-419; MOP Volume II, Part 3, §4.11)
  9. Proprietary or trade secret information provided to EPA will be subject to the requirements of 40 CFR Part 2, Subpart B - Public Information, Confidentiality of Business Information. (40 CFR Part 2)
  10. The emissions inventory submitted with the application for this Major Facility Review Permit is an estimate of actual emissions for the time period stated and is included only as one means of determining applicable requirements for emission sources. It does not establish, or constitute a basis for establishing, any new emission limitations. (MOP Volume II, Part 3, §4.11)
  11. The responsible official shall certify all documents submitted by the facility pursuant to the major facility review permit. The certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. A responsible official for the facility shall sign the certifications. (MOP Volume II, Part 3, §4.11)

### **C. Requirement to Pay Fees**

The permit holder shall pay annual fees in accordance with District Regulation 3, including Schedule P. (Regulation 2-6-402 & 409.13, Regulation 3; MOP Volume II, Part 3, §4.12)

### **D. Inspection and Entry**

Access to Facility: The permit holder shall provide reasonable access to the facility and equipment that is subject to this permit to the APCO and/or to his or her designee. (Regulation 1-440, Regulation 2-6-409.3; MOP Volume II, Part 3, §4.14)

### **E. Records**

1. The permit holder must provide any information, records, and reports requested or

## I. Standard Conditions

- specified by the APCO. (Regulation 1-441, Regulation 2-6-409.4)
2. Notwithstanding the specific wording in any requirement, all records for federally enforceable requirements shall be maintained for at least five years from the date of entry. (Regulation 2-6-501, Regulation 3; MOP Volume II, Part 3, §4.7)

## F. Monitoring Reports

Reports of all required monitoring must be submitted to the District at least once every six months, except where an applicable requirement specifies more frequent reporting. The first reporting period for this permit shall be November 6, 2001, to April 30, 2002. The report shall be submitted by May 31, 2002. Subsequent reports shall be for the following periods: May 1st through October 31st and November 1st through April 30th, and are due on the last day of the month after the end of the reporting period. All instances of non-compliance shall be clearly identified in these reports. The reports shall be certified by the responsible official as true, accurate, and complete. In addition, all instances of non-compliance with the permit shall be reported in writing to the District's Compliance and Enforcement Division within 10 calendar days of the discovery of the incident. Within 30 calendar days of the discovery of any incident of non-compliance, the facility shall submit a written report including the probable cause of non-compliance and any corrective or preventative actions. The reports shall be sent to the following address:

Director of Compliance and Enforcement  
939 Ellis Street  
San Francisco, CA 94109  
Attn: Title V Reports

(Regulation 2-6-502, Regulation 3; MOP Volume II, Part 3, §4.7)

## G. Compliance Certification

Compliance certifications shall be submitted annually by the responsible official of this facility to the Bay Area Air Quality Management District and to the Environmental Protection Agency. The certification period will be November 1st to October 31st. The certification shall be submitted by November 30th of each year. The certification must list each applicable requirement, the compliance status, whether compliance was continuous or intermittent, the method used to determine compliance, and any other specific information required by the permit. The permit holder may satisfy this requirement through submittal of District-generated Compliance Certification forms. The certification should be directed to the District's Compliance and Enforcement Division at the address above, and a copy of the certification should be sent to the Environmental Protection Agency at the following address:

Director of the Air Division  
USEPA, Region IX  
75 Hawthorne Street  
San Francisco, CA 94105  
Attention: Air-3

(MOP Volume II, Part 3, §4.5 and 4.15)

## H. Emergency Provisions

1. The permit holder may seek relief from enforcement action in the event of a

## **I. Standard Conditions**

breakdown, as defined by Regulation 1-208 of the District's Rules and Regulations, by following the procedures contained in Regulations 1-431 and 1-432. The District will thereafter determine whether breakdown relief will be granted in accordance with Regulation 1-433. (MOP Volume II, Part 3, §4.8)

2. The permit holder may seek relief from enforcement action for a violation of any of the terms and conditions of this permit by applying to the District's Hearing Board for a variance pursuant to Health and Safety Code Section 42350. The Hearing Board will determine after notice and hearing whether variance relief should be granted in accordance with the procedures and standards set forth in Health and Safety Code Section 42350 et seq. (MOP Volume II, Part 3, §4.8)
3. The granting by the District of breakdown relief or the issuance by the Hearing Board of a variance will not provide relief from federal enforcement. (MOP Volume II, Part 3, §4.8)

### **I. Severability**

In the event that any provision of this permit is invalidated by a court or tribunal of competent jurisdiction, or by the Administrator of the EPA, all remaining portions of the permit shall remain in full force and effect. (Regulation 2-6-409.5; MOP Volume II, Part 3, §4.10)

### **J. Miscellaneous Conditions**

1. The maximum capacity for each source as shown in Table II-A is the maximum allowable capacity. Exceedance of the maximum allowable capacity for any source is a violation of Regulation 2, Rule 1, Section 301. (Regulation 2-1-301)

## II. EQUIPMENT

**Table II A - Permitted Sources**

Each of the following sources has been issued a permit to operate pursuant to the requirements of BAAQMD Regulation 2, Permits. The capacities in this table are the maximum allowable capacities for each source, pursuant to Standard Condition I.J and Regulation 2-1-301.

S-#	Description	Make or Type	Model	Capacity
1	Rotogravure Coater at Extruder Laminator #11	Faustel	None	<del>69 reams/hour</del>
2	Drying Oven at Extruder Laminator #11 (natural gas)	Faustel	None	600,000 BTU/hour
17	Primer Station #1 at Extruder Laminator #15	Guardian/Faustel	None	<del>108 reams/hour</del>
18	Drying Oven #1 at Extruder Laminator #15 (natural gas)	Guardian	None	600,000 BTU/hour
22	6-Color Flexographic Press P-4	NCF-4	None	<del>65 reams/hr</del>
23	Drying Oven at Press P-4 (natural gas)	PCMC	None	600,000 BTU/hour
24	Primer Station #2 at Extruder Laminator #15	Inter-Roto	None	<del>60 reams/hour</del>
25	Drying Oven #2 at Extruder Laminator #15 (natural gas)	Inter-Roto	None	3 MM BTU/hour
26	Flexographic Press P-5 w/Between-Color Dryers and Tunnel Dryer (natural gas)	PCMC	6971	2.4 MM BTU/hour

## II. Equipment

**Table II B - Abatement Devices**

A-#	Description	Source(s) Controlled	Applicable Requirement	Operating Parameters	Limit or Efficiency
2	Catalytic Oxidizer, Grace TEC Systems, Magnum 9	S-1, S-2, S-17, S-18, S-22, S-23, S-24, S-25, & S-26	BAAQMD Condition #14373, part 2	Minimum operating temperature of 500°F or adjusted in accordance to source test result	See Note 1 Below
3	Catalytic Oxidizer, Megtec Systems, Magnum	S-1, S-2, S-17, S-18, S-22, S-23, S-24, S-25, & S-26	BAAQMD Condition #14373, part 2	Minimum operating temperature of 500°F or adjusted in accordance to source test result	See Note 1 Below

Note 1: The owner/operator shall not operate the A-2 and/or A-3 catalytic oxidizer unless one of the following is met: (basis: BACT)

- a. an outlet non-methane hydrocarbon (NMHC) concentration of 10 ppmv or less, OR
- b. one of the following, as determined by the inlet NMHC concentration into A-2 and/or A-3:
  1. NMHC destruction efficiency of at least 98.5% if inlet NMHC concentration is greater than 2000 ppmv; OR
  2. NMHC destruction efficiency of at least 97% if inlet NMHC concentration is greater than 200 ppmv, but no greater than 2000 ppmv; OR
  3. NMHC destruction efficiency of at least 90% if inlet NMHC concentration is 200 ppmv or less.



### III. GENERALLY APPLICABLE REQUIREMENTS

The permit holder shall comply with all applicable requirements, including those specified in the BAAQMD and SIP Rules and Regulations and other federal requirements cited below. These requirements apply in a general manner to the facility and/or to sources exempt from the requirement to obtain a District Permit to Operate. The District has determined that these requirements would not be violated under normal, routine operations, and that no additional periodic monitoring or reporting to demonstrate compliance is warranted. In cases where a requirement, in addition to being generally applicable, is also specifically applicable to one or more sources, the requirement and the source are also included in Section IV, Source-Specific Applicable Requirements, of this permit.

The dates in parenthesis in the Title column identify the versions of the regulations being cited and are, as applicable:

1. BAAQMD regulation(s): The date(s) of adoption or most recent amendment of the regulation by the District Board of Directors.
2. Any federal requirement, including a version of a District regulation that has been approved into the SIP: The most recent date of EPA approval of any portion of the rule, encompassing all actions on the rule through that date

The full language of SIP requirements is on EPA Region 9's website. The address is included at the end of this permit.

**NOTE:**

There are differences between the current BAAQMD rule and the version of the rule in the SIP. All sources must comply with both versions of the rule until US EPA has reviewed and approved (or disapproved) the District's revision of the regulation.

**Table III  
 Generally Applicable Requirements**

<b>Applicable Requirement</b>	<b>Regulation Title or Description of Requirement</b>	<b>Federally Enforceable (Y/N)</b>
BAAQMD Regulation 1	General Provisions and Definitions (5/2/01)	N
SIP Regulation 1	General Provisions and Definitions (8/27/99)	Y
BAAQMD Regulation 2, Rule 1	General Requirements (8/1/01)	N
BAAQMD 2-1-429	Federal Emissions Statement (6/7/95)	Y
SIP Regulation 2, Rule 1	General Requirements (8/27/99)	Y
BAAQMD Regulation 4	Air Pollution Episode Plan (3/20/91)	N
SIP Regulation 4	Air Pollution Episode Plan (8/06/90)	Y
BAAQMD Regulation 5	Open Burning (3/6/02)	N
SIP Regulation 5	Open Burning 9/4/98)	Y

### III. Generally Applicable Requirements

**Table III**  
**Generally Applicable Requirements**

<b>Applicable Requirement</b>	<b>Regulation Title or Description of Requirement</b>	<b>Federally Enforceable (Y/N)</b>
BAAQMD Regulation 6	Particulate Matter and Visible Emissions (12/19/90)	Y
BAAQMD Regulation 7	Odorous Substances (3/17/82)	N
BAAQMD Regulation 8, Rule 1	Organic Compounds - General Provisions (6/15/94)	Y
BAAQMD Regulation 8, Rule 3	Organic Compounds - Architectural Coatings (12/20/95)	Y
SIP Regulation 8, Rule 3	Organic Compounds - Architectural Coatings (2/18/98)	Y
BAAQMD Regulation 8, Rule 49	Organic Compounds - Aerosol Paint Products (12/20/95)	N
SIP Regulation 8, Rule 49	Organic Compounds - Aerosol Paint Products (3/22/95)	Y
BAAQMD Regulation 11, Rule 2	Hazardous Pollutants - Asbestos Demolition, Renovation and Manufacturing (12/4/91)	Y
BAAQMD Regulation 12, Rule 4	Miscellaneous Standards of Performance - Sandblasting (7/11/90)	N
SIP Regulation 12, Rule 4	Miscellaneous Standards of Performance - Sandblasting (9/2/81)	Y
California Health and Safety Code Section 44300 et seq.	Air Toxics "Hot Spots" Information and Assessment Act of 1987	N
40 CFR Part 61, Subpart M	National Emission Standards for Hazardous Air Pollutants – National Emission Standard for Asbestos (6/19/95)	Y

#### IV. SOURCE-SPECIFIC APPLICABLE REQUIREMENTS

The permit holder shall comply with all applicable requirements, including those specified in the BAAQMD and SIP Rules and Regulations and other federal requirements cited below. The requirements cited in the following tables apply in a specific manner to the indicated source(s).

The dates in parenthesis in the Title column identify the versions of the regulations being cited and are, as applicable:

1. BAAQMD regulation(s): The date(s) of adoption or most recent amendment of the regulation by the District Board of Directors
2. Any federal requirement, including a version of a District regulation that has been approved into the SIP: The most recent date of EPA approval of any portion of the rule, encompassing all actions on the rule through that date

The full text of each permit condition cited is included in Section VI, Permit Conditions, of this permit. The full language of SIP requirements is on EPA Region 9’s website. The address is included at the end of this permit. All other text may be found in the regulations themselves.

**Table IV – A**  
**Source-specific Applicable Requirements**  
**S-1 ROTOGRAVURE COATER AT EXTRUDER LAMINATOR #11**  
**S-2 DRYING OVEN AT EXTRUDER LAMINATOR #11**

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
<b>BAAQMD Regulation 1</b>	<b>General Provisions and Definitions (5/2/01)</b>		
1-523	Parametric monitoring and Recordkeeping Procedures	N	
1-523.1	Parametric monitor periods of in operation	Y	
1-523.2	Limits on periods of in operation	Y	
1-523.3	Reports of Violations	N	
1-523.4	Records	Y	
1-523.5	Maintenance and calibration	N	
<b>SIP Regulation 1</b>	<b>General Provisions and Definitions (6/28/99)</b>		
1-523	Parametric monitoring and Recordkeeping Procedures	Y <sup>1</sup>	
1-523.3	Reports of Violations	Y <sup>1</sup>	
1-523.5	Maintenance and calibration	Y <sup>1</sup>	

## IV. Source-specific Applicable Requirements

**Table IV – A**  
**Source-specific Applicable Requirements**  
**S-1 ROTOGRAVURE COATER AT EXTRUDER LAMINATOR #11**  
**S-2 DRYING OVEN AT EXTRUDER LAMINATOR #11**

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
<b>BAAQMD Regulation 8, Rule 20</b>	<b>Graphic Arts Printing and Coating Operations (3/3/99)</b>		
8-20-302	Flexographic, Gravure, Letterpress, and Lithographic Requirements	N	
8-20-308	Approved Emission Control System Requirements	Y	
8-20-309	Cleaning Product Requirements	N	
8-20-320	Solvent Evaporation Loss Minimization	Y	
8-20-320.1	Closed storage and disposal containers	Y	
8-20-320.2	Closed containers for organic solvents	Y	
8-20-320.3	Closed containers for inks, coatings, adhesives	Y	
8-20-503	Records		
8-20-503.1	Current list of inks, makeup solvent, cleanup solvent	N	
8-20-503.2	Monthly material usage	Y	
8-20-503.3	Monthly coating, adhesive, solvent usage	Y	
8-20-503.4	Record Retention Requirement	Y	
8-20-505	Emission Control System Monitoring (temperature)	Y	
8-20-506	Emission Control System, Recordkeeping Requirements		
8-20-506.1	Current list of inks, coatings, adhesives, makeup solvent	Y	
8-20-506.2	Daily ink, coating, adhesive, solvent usage	Y	
8-20-506.3	Daily monitoring of system parameters	Y	
8-20-506.4	Record Retention	Y	
<b>SIP Regulation 8, Rule 20</b>	<b>Organic Compounds – Graphic Arts Printing and Coating Operations (12/23/97)</b>		
8-20-302	Flexographic, Gravure, Letterpress, and Lithographic Requirements	N	
8-20-308	Approved Emission Control System	Y	
8-20-503	Records	Y	
8-20-503.1	Current list of inks, makeup solvent	Y	
<b>40 CFR Part 63, Subpart KK</b>	<b>National Emission Standards for the Printing and Publishing Industry</b>		
63.820(a)(2)	Standards: Product and packaging rotogravure and wide-web flexographic printing as an area source facility	Y	
63.820(a)(2)(i)	Maintain HAP emissions of less than 10 TPY	Y	
63.820(a)(2)(ii)	Maintain combine HAP emissions of less than 25 TPY	Y	
63.829(d)	Recordkeeping and Calculation Requirements	Y	
63.830(b)(1)	Reporting Requirements	Y	

## IV. Source-specific Applicable Requirements

**Table IV – A**  
**Source-specific Applicable Requirements**  
**S-1 ROTOGRAVURE COATER AT EXTRUDER LAMINATOR #11**  
**S-2 DRYING OVEN AT EXTRUDER LAMINATOR #11**

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
<b>BAAQMD Condition #14373</b>			
Part 1b	Minimum overall A-2 and A-3 control efficiency (basis: cumulative increase)	Y	
Part 2	Minimum A-2 and A-3 destruction efficiency (basis: cumulative increase)		
Part 3	Abatement requirement for non-compliance material defined by Reg.8-302 (basis: cumulative increase)	Y	
Part 4	A-2 and A-3 capture efficiency interlock (basis: BACT)	Y	
Part 5	Minimum inlet catalyst temp. for A-2 and A-3 (basis: cumulative increase)	Y	
Part 6	A-2 and A-3 catalytic oxidizer temp. monitoring (basis: cumulative increase)	Y	
Part 7	A-2 and A-3 catalytic oxidizer preheat requirement (basis: BACT)	Y	
Part 8	Collection system integrity inspection requirement (basis: cumulative increase)	Y	
Part 10	Annual VOC emission limitation (basis: cumulative increase)	Y	
Part 12	Record keeping requirement (basis: cumulative increase)	Y	
Part 13	Violation reporting requirement (basis: 1-420)	Y	
Part 14	Source Test Requirement (basis: BACT)	Y	
Part 15	Source Test Requirement (basis: BACT)	Y	
<b>BAAQMD Condition #20229</b>			
Part 1	HAPs Limitation (basis: <a href="#">40 CFR 63, Subpart KK</a> ; Regulation 2-6-503; Synthetic Minor-Regulation 2-6-311)	Y	
Part 2	HAPs Recordkeeping Requirement (basis: <a href="#">40 CFR 63, Subpart KK</a> ; Regulation 2-6-503; Synthetic Minor-Regulation 2-6-311)	Y	

## IV. Source-specific Applicable Requirements

**Table IV – B**  
**Source-specific Applicable Requirements**  
**S-17 PRIMER STATION #1 AT EXTRUDER LAMINATOR #15**  
**S-18 DRYING OVEN #1 AT EXTRUDER LAMINATOR #15**

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
<b>BAAQMD Regulation 1</b>	<b>General Provisions and Definitions (5/2/01)</b>		
1-523	Parametric monitoring and Recordkeeping Procedures	N	
1-523.1	Parametric monitor periods of in operation	Y	
1-523.2	Limits on periods of in operation	Y	
1-523.3	Reports of Violations	N	
1-523.4	Records	Y	
1-523.5	Maintenance and calibration	N	
<b>SIP Regulation 1</b>	<b>General Provisions and Definitions (6/28/99)</b>		
1-523	Parametric monitoring and Recordkeeping Procedures	Y <sup>1</sup>	
1-523.3	Reports of Violations	Y <sup>1</sup>	
1-523.5	Maintenance and calibration	Y <sup>1</sup>	
<b>BAAQMD Regulation 8, Rule 20</b>	<b>Graphic Arts Printing and Coating Operations (3/3/99)</b>		
8-20-302	Flexographic, Gravure, Letterpress, and Lithographic Requirements	N	
8-20-308	Approved Emission Control System Requirements	Y	
8-20-309	Cleaning Product Requirements	N	
8-20-320	Solvent Evaporation Loss Minimization	Y	
8-20-320.1	Closed storage and disposal containers	Y	
8-20-320.2	Closed containers for organic solvents	Y	
8-20-320.3	Closed containers for inks, coatings, adhesives	Y	
8-20-503	Records		
8-20-503.1	Current list of inks, makeup solvent, cleanup solvent	N	
8-20-503.2	Monthly material usage	Y	
8-20-503.3	Monthly coating, adhesive, solvent usage	Y	
8-20-503.4	Record Retention Requirement	Y	
8-20-505	Emission Control System Monitoring (temperature)	Y	
8-20-506	Emission Control System, Recordkeeping Requirements		
8-20-506.1	Current list of inks, coatings, adhesives, makeup solvent	Y	
8-20-506.2	Daily ink, coating, adhesive, solvent usage	Y	
8-20-506.3	Daily monitoring of system parameters	Y	

## IV. Source-specific Applicable Requirements

**Table IV – B**  
**Source-specific Applicable Requirements**  
**S-17 PRIMER STATION #1 AT EXTRUDER LAMINATOR #15**  
**S-18 DRYING OVEN #1 AT EXTRUDER LAMINATOR #15**

<b>Applicable Requirement</b>	<b>Regulation Title or Description of Requirement</b>	<b>Federally Enforceable (Y/N)</b>	<b>Future Effective Date</b>
8-20-506.4	Record Retention	Y	
<b>SIP Regulation 8, Rule 20</b>	<b>Organic Compounds – Graphic Arts Printing and Coating Operations (12/23/97)</b>		
8-20-302	Flexographic, Gravure, Letterpress, and Lithographic Requirements	N	
8-20-308	Approved Emission Control System	Y	
8-20-503	Records	Y	
8-20-503.1	Current list of inks, makeup solvent	Y	
<b>40 CFR Part 63, Subpart KK</b>	<b>National Emission Standards for the Printing and Publishing Industry</b>		
63.820(a)(2)	Standards: Product and packaging rotogravure and wide-web flexographic printing as an area source facility	Y	
63.820(a)(2)(i)	Maintain HAP emissions of less than 10 TPY	Y	
63.820(a)(2)(ii)	Maintain combine HAP emissions of less than 25 TPY	Y	
63.829(d)	Recordkeeping and Calculation Requirements	Y	
63.830(b)(1)	Reporting Requirements	Y	
<b>BAAQMD Condition #14373</b>			
Part 1a	Minimum overall A-2 and A-3 control efficiency (basis: cumulative increase)	Y	
Part 2	Minimum A-2 and A-3 destruction efficiency (basis: cumulative increase)		
Part 3	Abatement requirement for non-compliance material defined by Reg.8-302 (basis: cumulative increase)	Y	
Part 4	A-2 and A-3 capture efficiency interlock (basis: BACT)	Y	
Part 5	Minimum inlet catalyst temp. for A-2 and A-3 (basis: cumulative increase)	Y	
Part 6	A-2 and A-3 catalytic oxidizer temp. monitoring (basis: cumulative increase)	Y	
Part 7	A-2 and A-3 catalytic oxidizer preheat requirement (basis: BACT)	Y	
Part 8	Collection system integrity inspection requirement (basis: cumulative increase)	Y	
Part 12	Record keeping requirement (basis: cumulative increase)	Y	

#### IV. Source-specific Applicable Requirements

**Table IV – B**  
**Source-specific Applicable Requirements**  
**S-17 PRIMER STATION #1 AT EXTRUDER LAMINATOR #15**  
**S-18 DRYING OVEN #1 AT EXTRUDER LAMINATOR #15**

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
Part 13	Violation reporting requirement (basis: 1-420)	Y	
Part 14	Source Test Requirement (basis: BACT)	Y	
Part 15	Source test requirement (basis: BACT)	Y	
<b>BAAQMD Condition #20229</b>			
Part 1	HAPs Limitation (basis: <del>40 CFR 63, Subpart KK</del> ; Regulation 2-6-503; Synthetic Minor-Regulation 2-6-311)	Y	
Part 2	HAPs record keeping (basis: <del>40 CFR 63, Subpart KK</del> ; Regulation 2-6-503; Synthetic Minor-Regulation 2-6-311)	Y	

**Table IV – C**  
**Source-specific Applicable Requirements**  
**S-22 6-COLOR FLEXOGRAPHIC PRESS P-4**  
**S-23 DRYING OVEN AT PRESS P-4**

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
<b>BAAQMD Regulation 8, Rule 20</b>	<b>Graphic Arts Printing and Coating Operations (3/3/99)</b>		
8-20-302	Flexographic, Gravure, Letterpress, and Lithographic Requirements	Y	
8-20-308	Approved Emission Control System Requirements	Y	
8-20-309	Cleaning Product Requirements	Y	
8-20-320	Solvent Evaporation Loss Minimization		
8-20-320.1	Closed storage and disposal containers	Y	
8-20-320.2	Closed containers for organic solvents	Y	
8-20-320.3	Closed containers for inks, coatings, adhesives	Y	
8-20-503	Records		
8-20-503.1	Current list of inks, makeup solvent, cleanup solvent	N	
8-20-503.2	Monthly material usage	Y	



## IV. Source-specific Applicable Requirements

**Table IV – C**  
**Source-specific Applicable Requirements**  
**S-22 6-COLOR FLEXOGRAPHIC PRESS P-4**  
**S-23 DRYING OVEN AT PRESS P-4**

<b>Applicable Requirement</b>	<b>Regulation Title or Description of Requirement</b>	<b>Federally Enforceable (Y/N)</b>	<b>Future Effective Date</b>
8-20-503.3	Monthly coating, adhesive, solvent usage	Y	
8-20-503.4	Record Retention Requirement	Y	
<b>SIP Regulation 8, Rule 20</b>	<b>Organic Compounds – Graphic Arts Printing and Coating Operations (9/13/00)</b>		
8-20-503	Records	Y	
8-20-505	Emission Control Monitoring	Y	
8-20-506	Emission Control Record keeping	Y	
<b>40 CFR Part 63, Subpart KK</b>	<b>National Emission Standards for the Printing and Publishing Industry</b>		
63.820(a)(2)	Standards: Product and packaging rotogravure and wide-web flexographic printing as an area source facility	Y	
63.820(a)(2)(i)	Maintain HAP emissions of less than 10 TPY	Y	
63.820(a)(2)(ii)	Maintain combined HAP emissions of less than 25 TPY	Y	
63.829(d)	Recordkeeping and Calculation Requirements	Y	
63.830(b)(1)	Reporting Requirements	Y	
<b>BAAQMD Condition #14373</b>			
Part 1c	Minimum overall A-2 and A-3 control efficiency (basis: cumulative increase)	Y	
Part 2	Minimum A-2 and A-3 destruction efficiency (basis: cumulative increase)		
Part 3	Abatement requirement for non-compliance material defined by Reg.8-302 (basis: cumulative increase)	Y	
Part 4	A-2 and A-3 capture efficiency interlock (basis: BACT)	Y	
Part 5	Minimum inlet catalyst temp. for A-2 and A-3 (basis: cumulative increase)	Y	
Part 6	A-2 and A-3 catalytic oxidizer temp. monitoring (basis: cumulative increase)	Y	
Part 7	A-2 and A-3 catalytic oxidizer preheat requirement (basis: BACT)	Y	
Part 8	Collection system integrity inspection requirement	Y	
Part 9	Annual VOC emission limitation (basis: cumulative increase)	Y	
Part 12	Record keeping requirement (basis: cumulative increase)	Y	

#### IV. Source-specific Applicable Requirements

**Table IV – C**  
**Source-specific Applicable Requirements**  
**S-22 6-COLOR FLEXOGRAPHIC PRESS P-4**  
**S-23 DRYING OVEN AT PRESS P-4**

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
Part 13	Violation reporting requirement (basis: 1-420)	Y	
Part 14	Source test requirement (basis: BACT)	Y	
Part 15	Source test requirement (basis: BACT)	Y	
<b>BAAQMD Condition #20229</b>			
Part 1	HAPs Limitation (basis: <del>40 CFR 63, Subpart KK</del> ; Regulation 2-6-503; Synthetic Minor-Regulation 2-6-311)	Y	
Part 2	HAPs record keeping (basis: <del>40 CFR 63, Subpart KK</del> ; Regulation 2-6-503; Synthetic Minor-Regulation 2-6-311)	Y	

**Table IV – D**  
**Source-specific Applicable Requirements**  
**S-24 PRIMER STATION #2 AT EXTRUDER LAMINATOR #15**  
**S-25 DRYING OVEN #2 AT EXTRUDER LAMINATOR #15**

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
<b>BAAQMD Regulation 1</b>	<b>General Provisions and Definitions (5/2/01)</b>		
1-523	Parametric monitoring and Recordkeeping Procedures	N	
1-523.1	Parametric monitor periods of in operation	Y	
1-523.2	Limits on periods of in operation	Y	
1-523.3	Reports of Violations	N	
1-523.4	Records	Y	
1-523.5	Maintenance and calibration	N	
<b>SIP Regulation 1</b>	<b>General Provisions and Definitions (6/28/99)</b>		
1-523	Parametric monitoring and Recordkeeping Procedures	Y <sup>1</sup>	
1-523.3	Reports of Violations	Y <sup>1</sup>	
1-523.5	Maintenance and calibration	Y <sup>1</sup>	

## IV. Source-specific Applicable Requirements

**Table IV – D**  
**Source-specific Applicable Requirements**  
**S-24 PRIMER STATION #2 AT EXTRUDER LAMINATOR #15**  
**S-25 DRYING OVEN #2 AT EXTRUDER LAMINATOR #15**

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
<b>BAAQMD Regulation 8, Rule 20</b>	<b>Graphic Arts Printing and Coating Operations (3/3/99)</b>		
8-20-302	Flexographic, Gravure, Letterpress, and Lithographic Requirements	N	
8-20-308	Approved Emission Control System Requirements	Y	
8-20-309	Cleaning Product Requirements	Y	
8-20-320	Solvent Evaporation Loss Minimization		
8-20-320.1	Closed storage and disposal containers	Y	
8-20-320.2	Closed containers for organic solvents	Y	
8-20-320.3	Closed containers for inks, coatings, adhesives	Y	
8-20-503	Records		
8-20-503.1	Current list of inks, makeup solvent, cleanup solvent	N	
8-20-503.2	Monthly material usage	Y	
8-20-503.3	Monthly coating, adhesive, solvent usage	Y	
8-20-503.4	Record Retention Requirement	Y	
8-20-505	Emission Control System Monitoring (temperature)	Y	
8-20-506	Emission Control System, Recordkeeping Requirements		
8-20-506.1	Current list of inks, coatings, adhesives, makeup solvent	Y	
8-20-506.2	Daily ink, coating, adhesive, solvent usage	Y	
8-20-506.3	Daily monitoring of system parameters	Y	
8-20-506.4	Record Retention	Y	
<b>SIP Regulation 8, Rule 20</b>	<b>Organic Compounds – Graphic Arts Printing and Coating Operations (12/23/97)</b>		
8-20-302	Flexographic, Gravure, Letterpress, and Lithographic Requirements	Y	
8-20-308	Approved Emission Control System	Y	
8-20-503	Records	Y	
8-20-503.1	Current list of inks, makeup solvent	Y	
<b>40 CFR Part 63, Subpart KK</b>	<b>National Emission Standards for the Printing and Publishing Industry</b>		
63.820(a)(2)	Standards: Product and packaging rotogravure and wide-web flexographic printing as an area source facility	Y	
63.820(a)(2)(i)	Maintain HAP emissions of less than 10 TPY	Y	

## IV. Source-specific Applicable Requirements

**Table IV – D**  
**Source-specific Applicable Requirements**  
**S-24 PRIMER STATION #2 AT EXTRUDER LAMINATOR #15**  
**S-25 DRYING OVEN #2 AT EXTRUDER LAMINATOR #15**

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
63.820(a)(2)(ii)	Maintain combined HAP emissions of less than 25 TPY	Y	
63.829(d)	Recordkeeping Requirements	Y	
63.830(b)(1)	Reporting Requirements	Y	
<b>BAAQMD Condition #14373</b>			
Part 1a	Minimum overall A-2 and A-3 control efficiency (basis: cumulative increase)	Y	
Part 2	Minimum A-2 and A-3 destruction efficiency (basis: cumulative increase)		
Part 3	Abatement requirement for non-compliance material defined by Reg.8-302 (basis: cumulative increase)	Y	
Part 4	A-2 and A-3 capture efficiency interlock (basis: BACT)	Y	
Part 5	Minimum inlet catalyst temp. for A-2 and A-3 (basis: cumulative increase)	Y	
Part 6	A-2 and A-3 catalytic oxidizer temp. monitoring (basis: cumulative increase)	Y	
Part 7	A-2 and A-3 catalytic oxidizer preheat requirement (basis: BACT)	Y	
Part 8	Collection system integrity inspection requirement (basis: cumulative increase)	Y	
Part 11	Annual VOC emission limitation (basis: cumulative increase)	Y	
Part 12	Record keeping requirement (basis: cumulative increase)	Y	
Part 13	Violation reporting requirement (basis: 1-420)	Y	
Part 14	Source Test Requirement (basis: BACT)	Y	
Part 15	Source test requirement (basis: BACT)	Y	
<b>BAAQMD Condition #20229</b>			
Part 1	HAPs Limitation (basis: <del>40 CFR 63, Subpart KK</del> ; Regulation 2-6-503; Synthetic Minor-Regulation 2-6-311)	Y	
Part 2	HAPs record keeping (basis: <del>40 CFR 63, Subpart KK</del> ; Regulation 2-6-503; Synthetic Minor-Regulation 2-6-311)	Y	

## IV. Source-specific Applicable Requirements

**Table IV – E**  
**Source-specific Applicable Requirements**  
**S-26 Flexographic Printing Press P-5 w/Between-Color Dryers and Tunnel Dryer**

<b>Applicable Requirement</b>	<b>Regulation Title or Description of Requirement</b>	<b>Federally Enforceable (Y/N)</b>	<b>Future Effective Date</b>
<b>BAAQMD Regulation 1</b>	<b>General Provisions and Definitions (5/2/01)</b>		
1-523	Parametric monitoring and Recordkeeping Procedures	N	
1-523.1	Parametric monitor periods of in operation	Y	
1-523.2	Limits on periods of in operation	Y	
1-523.3	Reports of Violations	N	
1-523.4	Records	Y	
1-523.5	Maintenance and calibration	N	
<b>SIP Regulation 1</b>	<b>General Provisions and Definitions (6/28/99)</b>		
1-523	Parametric monitoring and Recordkeeping Procedures	Y <sup>1</sup>	
1-523.3	Reports of Violations	Y <sup>1</sup>	
1-523.5	Maintenance and calibration	Y <sup>1</sup>	
<b>BAAQMD Regulation 8, Rule 20</b>	<b>Graphic Arts Printing and Coating Operations (3/3/99)</b>		
8-20-302	Flexographic, Gravure, Letterpress, and Lithographic Requirements	Y	
8-20-308	Approved Emission Control System Requirements	Y	
8-20-309	Cleaning Product Requirements	Y	
8-20-320	Solvent Evaporation Loss Minimization		
8-20-320.1	Closed storage and disposal containers	Y	
8-20-320.2	Closed containers for organic solvents	Y	
8-20-320.3	Closed containers for inks, coatings, adhesives	Y	
8-20-503	Records		
8-20-503.1	Current list of inks, makeup solvent, cleanup solvent	N	
8-20-503.2	Monthly material usage	Y	
8-20-503.3	Monthly coating, adhesive, solvent usage	Y	
8-20-503.4	Record Retention Requirement	Y	
<b>SIP Regulation 8, Rule 20</b>	<b>Organic Compounds – Graphic Arts Printing and Coating Operations (9/13/00)</b>		
8-20-503	Records	Y	
8-20-505	Emission Control Monitoring	Y	
8-20-506	Emission Control Record keeping	Y	

## IV. Source-specific Applicable Requirements

**Table IV – E**  
**Source-specific Applicable Requirements**  
**S-26 Flexographic Printing Press P-5 w/Between-Color Dryers and Tunnel Dryer**

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
<b>40 CFR Part 63, Subpart KK</b>	<b>National Emission Standards for the Printing and Publishing Industry</b>		
63.820(a)(2)	Standards: Product and packaging rotogravure and wide-web flexographic printing as an area source facility	Y	
63.820(a)(2)(i)	Maintain HAP emissions of less than 10 TPY	Y	
63.820(a)(2)(ii)	Maintain combine HAP emissions of less than 25 TPY	Y	
63.829(d)	Recordkeeping and Calculation Requirements	Y	
63.830(b)(1)	Reporting Requirements	Y	
<b>BAAQMD Condition #14373</b>			
Part 14	Source test requirement (basis: BACT)	Y	
Part 15	Source test requirement (basis: BACT)	Y	
<b>BAAQMD Condition #15238</b>			
Part 1	Limitation on annual VOC emissions (basis: cumulative increase)	Y	
Part 2	Abatement Requirement (basis: cumulative increase)	Y	
Part 3	Minimum Overall A-2 and A-3 Control Efficiency (basis: cumulative increase)	Y	
Part 4	Waterborne Ink VOC Content Limitation (basis: cumulative increase)	Y	
Part 5	Recordkeeping Requirement (basis: cumulative increase)	Y	
<b>BAAQMD Condition #20229</b>			
Part 1	HAPs Limitation (basis: <del>40 CFR 63, Subpart KK</del> ; Regulation 2-6-503; Synthetic Minor-Regulation 2-6-311)	Y	
Part 2	HAPs Recordkeeping Requirement (basis: <del>40 CFR 63, Subpart KK</del> ; Regulation 2-6-503; Synthetic Minor-Regulation 2-6-311)	Y	

## V. SCHEDULE OF COMPLIANCE

The permit holder shall comply with all applicable requirements cited in this permit. The permit holder shall also comply with applicable requirements that become effective during the term of this permit on a timely basis.

## VI. PERMIT CONDITIONS

Any condition that is preceded by an asterisk is not federally enforceable.

### Condition #14373

For S-1, S-2, S-17, S-18, S-22, S-23, S-24, S-25, and S-26

- 1a. When complying materials (as defined per Regulation 8-20-302) are not being utilized at sources S-17, S-18, S-24, and S-25 the owner/operator shall not operate these sources unless A-2 and/or A-3 catalytic oxidizer are operating with an overall collection and control efficiency of at least 75% ( by weight). (basis: Regulation 8-20-302)
- 1b. When complying materials (as defined per Regulation 8-2-302) are not utilized at sources S-1 and S-2, the owner/operator shall not operate these sources unless A-2 and /or A-3 catalytic oxidizer are operating with an overall collection and control efficiency of at least 87.3% (by weight). (basis: cumulative increase)
- 1c. When complying materials (as defined per Regulation 8-2-302) are not utilized at sources S-22 and S-23, the owner/operator shall not operate these sources unless A-2 and /or A-3 catalytic oxidizer are operating with an overall collection and control efficiency of at least 77.6% (by weight). (basis: cumulative increase)
2. The owner/operator shall not operate the A-2 and/or A-3 catalytic oxidizer unless one of the following is met: (basis: BACT)
  - a. an outlet non-methane hydrocarbon (NMHC) concentration of 10 ppmv or less, OR
  - b. one of the following, as determined by the inlet NMHC concentration into A-2 and/or A-3:
    1. NMHC destruction efficiency of at least 98.5% if inlet NMHC concentration is greater than 2000 ppmv; OR
    2. NMHC destruction efficiency of at least 97% if inlet NMHC concentration is greater than 200 pmv, but no greater than 2000 ppmv; OR
    3. NMHC destruction efficiency of at least 90% if inlet NMHC concentration is 200 ppmv or less.

## VI. PERMIT CONDITIONS

3. Organic emissions from all sources shall be abated by A-2 and/or A-3 whenever any of these sources applies materials that do not comply with the limits in Regulation 8-20-302. (basis: Regulation 8-20-308 and BACT)
4. The following requirement applies when complying materials are not being used at S-1, S-2, S-17, S-18, S-22, S-23, S-24, or S-25. Complying materials are defined per Regulation 8-20-302. All sources shall be interlocked with A-2 and/or A-3 Catalytic Oxidizer so that the sources cannot operate in production mode unless both of the following requirements are being met:
  - a. The emissions of each subject source are directed to A-2 and/or A-3 Catalytic Oxidizer
  - b. A-2 and A-3 Catalytic Oxidizers are operating in compliance with condition 14373, parts 5 and 7.  
(basis: BACT)
5. The inlet catalyst cell temperature of A-2 and/or A-3 Catalytic Oxidizer shall be maintained at a minimum operating temperature of 500 degrees Fahrenheit whenever there is a pollutant stream directed to A-2 and/or A-3. The minimum temperatures may be adjusted by the District if source test data demonstrate that an alternate temperature is necessary for, or capable of, maintaining compliance with condition #14373, parts 1 and 2. (basis: cumulative increase)
6. The owner/operator shall install and maintain a continuous temperature recorder to monitor the A-2 and A-3 catalyst inlet cell temperature.  
(basis: cumulative increase)
7. A-2 and A-3 Catalytic Oxidizer shall be designed, equipped, and operated with a preheat feature which insures that the minimum inlet catalyst cell temperature specified in condition 14373, part 5, is achieved prior to the introduction of the pollutant stream to A-2 and/or A-3. (basis: BACT)
8. To verify compliance with Condition 14373, parts 1, 2, and 4, the owner/operator of S-1, S-2, S-17, S-18, S-22, S-23, S-24, and S-25 shall inspect and evaluate on a monthly basis the collection system interlock, ducting, dampers (including t-dampers and bypass dampers), and all ancillary equipment related to the emission collection system for each source to insure the collection system integrity and reliability.  
(basis: cumulative increase)



## VI. PERMIT CONDITIONS

### Condition #14373

#### For S-1, S-2, S-17, S-18, S-22, S-23, S-24, S-25, and S-26

9. Maximum VOC emissions from sources S-22 and S-23, resulting from all coatings, primers, make-up solvent, and cleanup solvent usage shall not exceed 39 tons per rolling 12-month year. (basis: cumulative increase)
10. Maximum VOC emissions from sources S-1 and S-2, resulting from all coatings, primers, make-up solvent, and cleanup solvent usage shall not exceed 6.63 tons per rolling 12-month year. (basis: cumulative increase)
11. Maximum VOC emissions from sources S-24 and S-25, resulting from all coatings, primers, make-up solvent, and cleanup solvent usage shall not exceed 12.3 tons per rolling 12-month year. (basis cumulative increase)
12. The owner/operator shall maintain daily ~~usage~~ records from which daily usage of ink, primer, coating, makeup solvent, and cleanup solvent used at source S-1, S-2, S-17, S-18, S-22, S-23, S-24 and S-25 can be determined. The records shall be kept in an APCO approved log and maintained on-site for at least five years from date of entry. These records shall contain the following:
  - a. date of record
  - b. name of each ink, primer, or coating used
  - c. quantity of each ink, primer, or coating used
  - d. amount of make-up solvent used
  - e. amount of cleanup solvent used
  - f. calculation of emissions based on MSDS information and allowable overall control efficiency (when no control is used, the control efficiency shall be zero) (basis: cumulative increase)
  - g. Within 30 days of the end of each month, the owner/operator shall summarize the emissions for the last consecutive 12 months.  
(Cumulative Increase)
13. If any limitation specified in parts 9, 10, and 11 is exceeded, the permit holder shall provide a written report to the APCO indicating the date of the violation and the resultant excess emissions. This report shall include the cause of the violation and proposed future measures to assure that no further violations will occur. This report shall be submitted within 10 days of determining that a limitation has been exceeded in accordance with Standard Condition I. F.  
(basis: District Regulation 1-420)

## VI. PERMIT CONDITIONS

### Condition #14373

For S-1, S-2, S-17, S-18, S-22, S-23, S-24, S-25, and S-26

- ~~14. A source test shall be conducted within one year of the installation of the A-3 Catalytic Oxidizer to determine compliance with part 2 of this condition. The Source test shall be repeated annually. The source test protocol shall be approved by the District's Source Test Manager. A copy of the test results shall be submitted to the District Staff. (basis: BACT, District Regulation 2-6-503)~~
14. The owner/operator shall conduct annual screening testing of the A-2 and A-3 catalytic oxidizer system, prior to October 31 of each calendar year. The screening testing shall be conducted at the shared outlet of the oxidizers (rather than at both the inlet and outlet of each of the oxidizers), unless the owner/operator elects to isolate each oxidizer and conduct simultaneous inlet and outlet testing for each oxidizer. The screening testing shall be conducted using District Method ST-7 or an alternative method approved in writing by the District, reporting non-methane hydrocarbon ("NMHC") in parts per million by volume concentration ("ppmv"). As part of the screening testing, any NHMC concentration attributable to contamination present in sampling equipment shall be determined by sampling of ambient air and used in determining the results of the screening testing. (basis: BACT, District Regulation 2-6-503)
15. ~~An annual source test of the A-2 Catalytic Oxidizer shall be conducted annually to determine compliance with part 2 of this condition. The source test protocol shall be approved by the District's Source Test Manager. A copy of the test results shall be submitted to the District Staff. (basis: BACT, District Regulation 2-6-503)~~
15. The results of a valid annual screening testing shall be submitted to the District within 60 days of completion of the screening test. If such results measure outlet NHMC at a level exceeding 10 ppmv, then within 30 days of conducting the screening test, the owner/operator may conduct a screening test of each oxidizer individually. If a valid screening test on an individual oxidizer is not done or if a valid screening test is done and measured outlet NHMC at a level exceeding 10 ppmv, the owner/operator shall then within 60 days of the original test date conduct inlet/outlet testing of that oxidizer to determine compliance with part 2b of this condition. The results of any such additional testing shall be submitted to the District within 60 days of completion of the testing. (basis: BACT, District Regulation 2-6-503)

### Condition #15238

For S-26, Flexographic Press

## VI. PERMIT CONDITIONS

1. Total Volatile Organic Compound (VOC) emissions due to ink, coatings, and cleanup solvent usage at S-26 shall not exceed 39 tons totaled over any consecutive twelve-month period. (basis: cumulative increase)
2. The between-color dryers and tunnel dryer associated with S-26 Flexographic Printing Press shall be abated by A-2 and/or A-3 Catalytic Oxidizer whenever solvent borne ink and coatings are applied at S-26. (basis: cumulative increase)
3. A-2 and/or A-3 Catalytic Oxidizer shall achieve an overall (capture x destruction) POC control efficiency of 75% by weight when abating POC emissions from S-26. (basis: cumulative increase)
4. The VOC content of waterborne inks (excluding metallic inks) applied at S-26 shall not exceed 1 pound per gallon, as applied. (basis: cumulative increase)
5. The owner/operator of S-26 shall maintain records of the following, VOC content, and net usage on a monthly basis in a District-approved log and retained on site for a minimum of five years from the date of entry: (basis: cumulative increase)
  - a. ink, coating, makeup solvent, and cleanup solvent type (waterborne, solvent borne, metallic)
  - b. ink, coating, makeup solvent, and cleanup solvent VOC content (pounds per gallon, as-supplied)
  - c. ink, coating, makeup solvent, and cleanup solvent net usage (pounds per month)

### **Condition #15238**

#### **For S-26, Flexographic Press**

- d. calculation of monthly VOC emissions (pounds per month) based on a 75% overall abatement efficiency for solvent based inks. For water based inks, assume all VOC contained in water based inks are emitted

If calculated VOC emissions exceed 39 tons for 12-month consecutive period, the owner/operator shall report non-compliance in accordance with Standard Condition I.F.

### **Condition #20229**

#### **Facility-wide Condition for Hazardous Air Pollutants:**

1. The owner/operator shall not emit more than 9 tons of any single hazardous air pollutant (HAP) or 23 tons of any combination of HAPs in any consecutive 12-month period. The sum of all glycol ethers that meet the definition in Section 112(b) of the Clean Air Act shall be considered one HAP. (basis: ~~40 CFR 63, Subpart KK~~; Synthetic Minor-Regulation 2-6-311)

## VI. PERMIT CONDITIONS

2. The owner/operator shall calculate and maintain records on a monthly basis of the quantities of each HAP emitted into the atmosphere from all sources at the facility. The owner/operator shall use the manufacturer's chemical speciation data or the MSDS information to calculate HAPs. For abated operations, the overall control efficiency shall be considered to be the overall control efficiency required by Condition 14373 part 1a, 1b, and 1c, provided that, the most recent source test for the abatement device meets the destruction efficiency requirements in Condition 14373, part 2. For unabated operations, all HAPs shall be considered fugitive. Within 30 days of the end of each month the HAPs must be totaled for the last consecutive 12-month period to ensure compliance with part 1. A summary of these records shall be submitted to the Director of Enforcement on an annual basis. (basis: ~~40 CFR 63, Subpart KK~~; Regulation 2-6-503; Synthetic Minor-Regulation 2-6-311)

## VII. APPLICABLE LIMITS & COMPLIANCE MONITORING REQUIREMENTS

This section has been included only to summarize the applicable emission limits contained in Section IV, Source-Specific Applicable Requirements, of this permit. The following tables show the relationship between each emission limit and the associated compliance monitoring provisions, if any. The monitoring frequency column indicates whether periodic (P) or continuous (C) monitoring is required. For periodic monitoring, the frequency of the monitoring has also been shown, using the following codes: annual (A), quarterly (Q), monthly (M), daily (D), or on an event basis (E). No monitoring (N) has been required if the current applicable rule or regulation does not require monitoring, and the operation is unlikely to deviate from the applicable emission limit based upon the nature of the operation.

**Table VII – A**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S-1 ROTOGRAVURE COATER AT EXTRUDER LAMINATOR #11**  
**S-2 DRYING OVEN AT EXTRUDER LAMINATOR #11**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
VOC	BAAQMD 8-20-302	Y		2.5 lb VOC/gal of ink and coating <a href="#">(during unabated operation)</a>	BAAQMD 8-20-503	P/M	Coating records
	BAAQMD 8-20-302	Y		1.25 lb VOC/gal of adhesive <a href="#">(during unabated operation)</a>	BAAQMD 8-20-503	P/M	Coating records
	BAAQMD 8-20-308	N		75% (wt) or greater overall VOC collection and control efficiency <a href="#">(during abated operation)</a>	BAAQMD 8-20-505	C	Temperature Gauge
	BAAQMD 8-20-308	N		75% (wt) or greater overall VOC collection and control efficiency <a href="#">(during abated operation)</a>	BAAQMD Condition #14373 Part 2	C	Mechanical interlock system
	BAAQMD 8-20-308	N		75% (wt) or greater overall VOC collection and control efficiency <a href="#">(during abated operation)</a>	BAAQMD Condition #14373 Parts 45 14 and 46 15	P/A	source test

## VII. Applicable Limits and Compliance Monitoring Requirements

**Table VII – A**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S-1 ROTOGRAVURE COATER AT EXTRUDER LAMINATOR #11**  
**S-2 DRYING OVEN AT EXTRUDER LAMINATOR #11**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
	BAAQMD 8-20-309	N		Cleaning Product VOC content limit of 7.4 lb/gal and VOC composite vapor pressure limit of 25 mm Hg @ 20°C	BAAQMD 8-20-503	P/M	Cleaning Product Records
	SIP 8-20-302	Y		2.5 lb VOC/gal of ink, coating, and adhesive <a href="#">(during unabated operation)</a>	BAAQMD 8-20-503	P/M	Coating records
	SIP 8-20-308	Y		75% (wt) or greater overall VOC collection and control efficiency <a href="#">(during abated operation)</a>	BAAQMD 8-20-505	C	Temperature Gauge
	SIP 8-20-308	Y		75% (wt) or greater overall VOC collection and control efficiency <a href="#">(during abated operation)</a>	BAAQMD Condition #14373 Part 4	C	Mechanical interlock system
	SIP 8-20-308	Y		75% (wt) or greater overall VOC collection and control efficiency <a href="#">(during abated operation)</a>	BAAQMD Condition #14373 Parts 15 and 16 14 and 15	P/A	Source test
VOC	BAAQMD Condition #14373, part 1b	Y		87.3% (wt) or greater overall VOC collection and destruction efficiency	BAAQMD Condition #14373 Part 6	C	Temperature Chart Recorder
VOC	BAAQMD Condition #14373, Part 1b	Y		87.3% (wt) or greater overall VOC collection and destruction efficiency	BAAQMD Condition #14373 Part 4	C	Mechanical interlock system
	BAAQMD Condition #14373, Part 1b	Y		87.3% (wt) or greater overall VOC collection and destruction efficiency	BAAQMD Condition #14373 Part 8	P/M	Collection System Integrity Inspection

## VII. Applicable Limits and Compliance Monitoring Requirements

**Table VII – A**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S-1 ROTOGRAVURE COATER AT EXTRUDER LAMINATOR #11**  
**S-2 DRYING OVEN AT EXTRUDER LAMINATOR #11**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
<a href="#">VOC</a>	BAAQMD Condition #14373, Part 1b	Y		87.3% (wt) or greater overall VOC collection and destruction efficiency	BAAQMD Condition #14373 Parts 14 and 15 <del>15</del> and <del>16</del>	P/A	source test
VOC	BAAQMD Condition #14373, Part 2	Y		Outlet NMHC concentration of 10 ppm <sub>y</sub> or less; <a href="#">or</a> if inlet concentration > 2000 ppm <sub>y</sub> then destruction efficiency of at least 98.5%; <a href="#">or</a> if inlet concentration is between 200 & 2000 ppm <sub>y</sub> then destruction efficiency of at least 97%; <a href="#">or</a> if inlet concentration < 200 ppm <sub>y</sub> then destruction efficiency of at least 90%	BAAQMD Condition #14373 part 4	C	Source/A-2 and A-3 interlock system
	BAAQMD Condition #14373, Part 2	Y		Outlet NMHC concentration of 10 ppm <sub>y</sub> or less; <a href="#">or</a> if inlet concentration > 2000 ppm <sub>y</sub> then destruction efficiency of at least 98.5%; <a href="#">or</a> if inlet concentration is between 200 & 2000 ppm <sub>y</sub> then destruction efficiency of at least 97%; <a href="#">or</a> if inlet concentration < 200 ppm <sub>y</sub> then destruction efficiency of at least 90%	BAAQMD Condition #14373 part 8	P/M	Collection System Integrity Inspection

## VII. Applicable Limits and Compliance Monitoring Requirements

**Table VII – A**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S-1 ROTOGRAVURE COATER AT EXTRUDER LAMINATOR #11**  
**S-2 DRYING OVEN AT EXTRUDER LAMINATOR #11**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
	BAAQMD Condition #14373, Part 2	Y		Outlet NMHC concentration of 10 ppm <sub>y</sub> or less; <u>or</u> if inlet concentration > 2000 ppm <sub>y</sub> then destruction efficiency of at least 98.5%; <u>or</u> if inlet concentration is between 200 & 2000 ppm <sub>y</sub> then destruction efficiency of at least 97%; <u>or</u> if inlet concentration < 200 ppm <sub>y</sub> then destruction efficiency of at least 90%	BAAQMD Condition #14373 Parts <del>15 and 16</del> <u>14 and 15</u>	P/A	Source test
	BAAQMD Condition #14373, Part 3	Y		Non-complying materials must be abated by A-2 &/or A-3	BAAQMD Condition #14373 Part 4	C	<del>Temperature Chart Recorder</del> Mechanical Interlock System
	BAAQMD Condition #14373, Part 5	Y		Minimum A-2 &/or A3 inlet catalyst cell temperature of 500°F or inlet catalyst cell temperature as established by most recent source test demonstrating compliance	BAAQMD Condition #14373 Part 6	C	Temperature Chart Recorder
	BAAQMD Condition #14373, part 7	Y		Allowable temperature excursion from A-2 &/or A3 operating temperature limit	BAAQMD Condition #14373 Part 6	P/M	Temperature chart recorder



## VII. Applicable Limits and Compliance Monitoring Requirements

**Table VII – A**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S-1 ROTOGRAVURE COATER AT EXTRUDER LAMINATOR #11**  
**S-2 DRYING OVEN AT EXTRUDER LAMINATOR #11**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
	BAAQMD Condition #14373 Part 10	Y		Maximum VOC emissions not to exceed 6.63 TPY	BAAQMD Condition #14373 Part 12	P/D	Usage records, calculations
	BAAQMD Condition #20229 Part 1			Single HAPs of less than 9 TPY and combine HAPs of 23 TPY	BAAQMD Condition #20229, Part2	P/M	Coating records, calculations
HAPs	40 CFR Part 63, Subpart KK, Section 63.820(a)(2)	Y		Each affected source's HAP emissions not to exceed 10 TPY for a single HAP and a combine HAP of 25 TPY	40 CFR Part 63, Subpart KK, Section 63.829(d) & 63.830(b)(1)	P/M	HAP Material usage records and certified product data sheets

**Table VII – B**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S-17 PRINTER STATION #1 AT EXTRUDER LAMINATOR #15**  
**S-18 DRYING OVEN #1 AT EXTRUDER LAMINATOR #15**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
VOC	BAAQMD 8-20-302	Y		2.5 lb VOC/gal of ink and coating ( <a href="#">during unabated operation</a> )	BAAQMD 8-20-503	P/M	Coating records
	BAAQMD 8-20-302	Y		1.25 lb VOC/gal of adhesive ( <a href="#">during unabated operation</a> )	BAAQMD 8-20-503	P/M	Coating records

## VII. Applicable Limits and Compliance Monitoring Requirements

**Table VII – B**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S-17 PRINTER STATION #1 AT EXTRUDER LAMINATOR #15**  
**S-18 DRYING OVEN #1 AT EXTRUDER LAMINATOR #15**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
	BAAQMD 8-20-308	N		75% (wt) or greater overall VOC collection and control efficiency <u>(during abated operation)</u>	BAAQMD 8-20-505	C	Temperature Gauge
	BAAQMD 8-20-308	N		75% (wt) or greater overall VOC collection and control efficiency <u>(during abated operation)</u>	BAAQMD Condition #14373 Part <del>2</del> 4	C	Mechanical interlock system
	BAAQMD 8-20-308	N		75% (wt) or greater overall VOC collection and control efficiency <u>(during abated operation)</u>	BAAQMD Condition #14373 Parts <del>15 and 16</del> 14 and 15	P/A	source test
	BAAQMD 8-20-309	N		Cleaning Product VOC content limit of 7.4 lb/gal and VOC composite vapor pressure limit of 25 mm Hg @ 20°C	BAAQMD 8-20-503	P/M	Cleaning Product Records
VOC	SIP 8-20-302	Y		2.5 lb VOC/gal of ink, coating, and adhesive <u>(during unabated operation)</u>	BAAQMD 8-20-503	P/M	Coating records
	SIP 8-20-308	Y		75% (wt) or greater overall VOC collection and control efficiency <u>(during abated operation)</u>	BAAQMD 8-20-505	C	Temperature Gauge
	SIP 8-20-308	Y		75% (wt) or greater overall VOC collection and control efficiency <u>(during abated operation)</u>	BAAQMD Condition #14373 Part <del>4</del> 2	C	Mechanical interlock system
VOC	BAAQMD Condition #14373, Part 1a	Y		75% (wt) or greater overall VOC collection and control efficiency	BAAQMD Condition #14373 Part 6	C	Temperature Chart Recorder

## VII. Applicable Limits and Compliance Monitoring Requirements

**Table VII – B**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S-17 PRINTER STATION #1 AT EXTRUDER LAMINATOR #15**  
**S-18 DRYING OVEN #1 AT EXTRUDER LAMINATOR #15**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
	BAAQMD Condition #14373, Part 1a	Y		75% (wt) or greater overall VOC collection and control efficiency	BAAQMD Condition #14373 Part 4	C	Mechanical interlock system
	BAAQMD Condition #14373, Part 1a	Y		75% (wt) or greater overall VOC collection and control efficiency	BAAQMD Condition #14373 Part 8	P/M	Collection System Integrity Inspection
	BAAQMD Condition #14373, part 1a	Y		75% (wt) or greater overall VOC collection and control efficiency	BAAQMD Condition #14373 Parts <del>15 and 16</del> 14 and 15	P/A	Source test
	BAAQMD Condition #14373, Part 2	Y		Outlet NMHC concentration of 10 ppm <sub>y</sub> or less; <u>or</u> if inlet concentration > 2000 ppm <sub>y</sub> then destruction efficiency of at least 98.5%; <u>or</u> if inlet concentration is between 200 & 2000 ppm <sub>y</sub> then destruction efficiency of at least 97%; <u>or</u> if inlet concentration < 200 ppm <sub>y</sub> then destruction efficiency of least 90%	BAAQMD Condition #14373 part 4	C	Source/A-2 and A-3 interlock system

## VII. Applicable Limits and Compliance Monitoring Requirements

**Table VII – B**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S-17 PRINTER STATION #1 AT EXTRUDER LAMINATOR #15**  
**S-18 DRYING OVEN #1 AT EXTRUDER LAMINATOR #15**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
	BAAQMD Condition #14373, Part 2	Y		Outlet NMHC concentration of 10 ppm <sub>y</sub> or less; <u>or</u> if inlet concentration > 2000 ppm <sub>y</sub> then destruction efficiency of at least 98.5%; <u>or</u> if inlet concentration is between 200 & 2000 ppm <sub>y</sub> then destruction efficiency of at least 97%; <u>or</u> if inlet concentration < 200 ppm <sub>y</sub> then destruction efficiency of at least 90%	BAAQMD Condition #14373 Part 8	P/M	Collection System Integrity Inspection
	BAAQMD Condition #14373, Part 2	Y		Outlet NMHC concentration of 10 ppm <sub>y</sub> or less; <u>or</u> if inlet concentration > 2000 ppm <sub>y</sub> then destruction efficiency of at least 98.5%; <u>or</u> if inlet concentration is between 200 & 2000 ppm <sub>y</sub> then destruction efficiency of at least 97%; <u>or</u> if inlet concentration < 200 ppm <sub>y</sub> then destruction efficiency of at least 90%	BAAQMD Condition #14373 Parts <del>15 and 16</del> <u>14 and 15</u>	P/A	Source test
	BAAQMD Condition #14373, Part 3	Y		Non-complying materials must be abated by A-2 &/or A-3	BAAQMD Condition #14373 Part 4	C	<del>Temperature Chart Recorder</del> Mechanical Interlock System

## VII. Applicable Limits and Compliance Monitoring Requirements

**Table VII – B**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S-17 PRINTER STATION #1 AT EXTRUDER LAMINATOR #15**  
**S-18 DRYING OVEN #1 AT EXTRUDER LAMINATOR #15**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
	BAAQMD Condition #14373, Part 5	Y		Minimum A-2 &/or A3 inlet catalyst cell temperature of 500°F or inlet catalyst cell temperature as established by most recent source test demonstrating compliance	BAAQMD Condition #14373 Part 6	C	Temperature Chart Recorder
	BAAQMD Condition #14373, Part 7	Y		Allowable temperature excursion from A-2 &/or A3 operating temperature limit	BAAQMD Condition #14373 Part 6	P/M	Temperature chart recorder
	BAAQMD Condition #20229 Part 1			Single HAPs of less than 9 TPY and combine HAPs of 23 TPY	BAAQMD Condition #20229, Part 2	P/M	Coating records, calculations
HAPs	40 CFR Part 63, Subpart KK, Section 63.820(a)(2)	Y		Each affected source's HAP emissions not to exceed 10 TPY for a single HAP and a combine HAP of 25 TPY	40 CFR Part 63, Subpart KK, Section 63.829(d) & 63.830(b)(1)	P/M	HAP Material usage records and certified product data sheets

## VII. Applicable Limits and Compliance Monitoring Requirements

**Table VII - C**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S-22 6-COLOR FLEXOGRAPHIC PRESS P-4**  
**S-23 DRYING OVEN AT PRESS P-4**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
VOC	BAAQMD 8-20-302	Y		2.5 lb VOC/gal of ink and coating ( <a href="#">during unabated operation</a> )	BAAQMD 8-20-503	P/M	Coating records
VOC	BAAQMD 8-20-308	Y		75% (wt) or greater overall VOC collection and control efficiency ( <a href="#">during abated operation</a> )	BAAQMD Condition #14373 <del>Part 8</del> Part 4	C	Mechanical interlock system
VOC	BAAQMD 8-20-308	Y		75% (wt) or greater overall VOC collection and control efficiency ( <a href="#">during abated operation</a> )	BAAQMD Condition #14373 Parts <del>15 and 16</del> 14 and 15	P/A	Source test
VOC	BAAQMD 8-20-309	N		Cleaning Product VOC content limit of 7.4 lb/gal and VOC composite vapor pressure limit of 25 mm Hg @ 20°C	BAAQMD 8-20-503	P/M	Cleaning Product Records
	SIP 8-20-302	Y		2.5 lb VOC/gal of ink, coating, and adhesive ( <a href="#">during unabated operation</a> )	BAAQMD 8-20-503	P/M	Coating records
	SIP 8-20-308	Y		75% (wt) or greater overall VOC collection and control efficiency when using non-complying materials ( <a href="#">during abated operation</a> )	BAAQMD Condition #14373 <del>Part 8</del> Part 4	C	Mechanical interlock system
	SIP 8-20-308	Y		75% (wt) or greater overall VOC collection and control efficiency when using non-complying materials ( <a href="#">during abated operation</a> )	BAAQMD Condition #14373 Parts <del>15 and 16</del> 14 and 15	P/A	Source test

## VII. Applicable Limits and Compliance Monitoring Requirements

**Table VII - C**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S-22 6-COLOR FLEXOGRAPHIC PRESS P-4**  
**S-23 DRYING OVEN AT PRESS P-4**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
VOC	BAAQMD Condition #14373, part 1c	Y		77.6% (wt) or greater overall VOC collection and destruction efficiency	BAAQMD Condition #14373 Part 6	C	Temperature Chart Recorder
	BAAQMD Condition #14373, part 1c	Y		77.6% (wt) or greater overall VOC collection and destruction efficiency	BAAQMD Condition #14373 Part <del>4</del>	C	Mechanical interlock system
	BAAQMD Condition #14373, part 1c	Y		77.6% (wt) or greater overall VOC collection and destruction efficiency	BAAQMD Condition #14373 Part 8	P/M	Collection System Integrity Inspection
	BAAQMD Condition #14373, part 1c	Y		77.6% (wt) or greater overall VOC collection and destruction efficiency	BAAQMD Condition #14373 Parts <del>15 and 16</del> 14 and 15	P/A	Source test
	BAAQMD Condition #14373, Part 2	Y		Outlet NMHC concentration of 10 ppm <sub>y</sub> or less; <u>or</u> if inlet concentration > 2000 ppm <sub>y</sub> then destruction efficiency of at least 98.5%; <u>or</u> if inlet concentration is between 200 & 2000 ppm <sub>y</sub> then destruction efficiency of at least 97%; <u>or</u> if inlet concentration < 200 ppm <sub>y</sub> then destruction efficiency of least 90%	BAAQMD Condition #14373 part 4	C	Source/A-2 and A-3 interlock system

## VII. Applicable Limits and Compliance Monitoring Requirements

**Table VII - C**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S-22 6-COLOR FLEXOGRAPHIC PRESS P-4**  
**S-23 DRYING OVEN AT PRESS P-4**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
	BAAQMD Condition #14373, Part 2	Y		Outlet NMHC concentration of 10 ppm <sub>y</sub> or less; <u>or</u> if inlet concentration > 2000 ppm <sub>y</sub> then destruction efficiency of at least 98.5%; <u>or</u> if inlet concentration is between 200 & 2000 ppm <sub>y</sub> then destruction efficiency of at least 97%; <u>or</u> if inlet concentration < 200 ppm <sub>y</sub> then destruction efficiency of at least 90%	BAAQMD Condition #14373 Parts <del>15 and 16</del> 14 and 15	P/A	Source test
	BAAQMD Condition #14373, Part 2	Y		Outlet NMHC concentration of 10 ppm <sub>y</sub> or less; <u>or</u> if inlet concentration > 2000 ppm <sub>y</sub> then destruction efficiency of at least 98.5%; <u>or</u> if inlet concentration is between 200 & 2000 ppm <sub>y</sub> then destruction efficiency of at least 97%; <u>or</u> if inlet concentration < 200 ppm <sub>y</sub> then destruction efficiency of at least 90%	BAAQMD Condition #14373 Part 8	P/M	Collection System Integrity Inspection
	BAAQMD Condition #14373, Part 3	Y		Non-complying materials must be abated by A-2 &/or A-3	BAAQMD Condition #14373 Part 4	C	<del>Temperature Chart Recorder</del> Mechanical Interlock System



## VII. Applicable Limits and Compliance Monitoring Requirements

**Table VII - C**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S-22 6-COLOR FLEXOGRAPHIC PRESS P-4**  
**S-23 DRYING OVEN AT PRESS P-4**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
	BAAQMD Condition #14373, Part 5	Y		Minimum A-2 &/or A3 inlet catalyst cell temperature of 500°F or inlet catalyst cell temperature as established by most recent source test demonstrating compliance	BAAQMD Condition #14373 Part 6	C	Temperature Chart Recorder
	BAAQMD Condition #14373, part 7	Y		Allowable temperature excursion from A-2 & /or A3 operating temperature limit	BAAQMD Condition #14373 Part 6	P/M	Temperature chart recorder
	BAAQMD Condition #14373 Part 10	Y		Maximum VOC emissions not to exceed 39 TPY	BAAQMD Condition #14373 Part 12	P/D	Usage records, calculations
	BAAQMD Condition #20229 Part 1	Y		Single HAPs not to exceed 9 TPY and combine HAPS of no more than 23 TPY	BAAQMD Condition #20229 part 2	P/D	Usage records, calculations
HAPs	40 CFR Part 63, Subpart KK, Section 63.820(a)(2)	Y		Each affected source's HAP emissions not to exceed 10 TPY for a single HAP and a combined HAPs of 25 TPY	40 CFR Part 63, Subpart KK, Section 63.829(d) & 63.830(b)(1)	P/M	HAP Material usage records and certified product data sheets

## VII. Applicable Limits and Compliance Monitoring Requirements

**Table VII – D**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S-24 PRIMER STATION #2 AT EXTRUDER LAMINATOR #15**  
**S-25 DRYING OVEN #2 AT EXTRUDER LAMINATOR #15**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
VOC	BAAQMD 8-20-302	Y		2.5 lb VOC/gal of ink and coating ( <a href="#">during unabated operation</a> )	BAAQMD 8-20-503	P/M	Coating records
	BAAQMD 8-20-308	Y		75% (wt) or greater overall VOC collection and control efficiency ( <a href="#">during abated operation</a> )	BAAQMD 8-20-505	C	Temperature Gauge
	BAAQMD 8-20-308	Y		75% (wt) or greater overall VOC collection and control efficiency ( <a href="#">during abated operation</a> )	BAAQMD Condition #14373 Parts 15 and 16 14 and 15	P/A	Source test
	SIP 8-20-302	Y		2.5 lb VOC/gal of ink, coating, and adhesive ( <a href="#">during unabated operation</a> )	BAAQMD 8-20-503	P/M	Coating records
	SIP 8-20-308	Y		75% (wt) or greater overall VOC collection and control efficiency ( <a href="#">during abated operation</a> )	BAAQMD 8-20-505	C	Temperature Gauge
	SIP 8-20-308	Y		75% (wt) or greater overall VOC collection and control efficiency ( <a href="#">during abated operation</a> )	BAAQMD Condition #14373 Parts 15 and 16 14 and 15	P/A	Source test
VOC	BAAQMD Condition #14373, part 1a	Y		75% (wt) or greater overall VOC collection and control efficiency	BAAQMD Condition #14373 Part 6	C	Temperature Chart Recorder
	BAAQMD Condition #14373, part 1a	Y		75% (wt) or greater overall VOC collection and control efficiency	BAAQMD Condition #14373 Part 4	C	Mechanical interlock system

## VII. Applicable Limits and Compliance Monitoring Requirements

**Table VII – D**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S-24 PRIMER STATION #2 AT EXTRUDER LAMINATOR #15**  
**S-25 DRYING OVEN #2 AT EXTRUDER LAMINATOR #15**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
	BAAQMD Condition #14373, part 1a	Y		75% (wt) or greater overall VOC collection and control efficiency	BAAQMD Condition #14373 Part 8	P/M	Collection System Integrity Inspection
	BAAQMD Condition #14373, part 1a	Y		75% (wt) or greater overall VOC collection and control efficiency	BAAQMD Condition #14373 Parts <del>15 and 16</del> 14 and 15	P/A	Source test
	BAAQMD Condition #14373, Part 2	Y		Outlet NMHC concentration of 10 ppm <sub>y</sub> or less; <u>or</u> if inlet concentration > 2000 ppm <sub>y</sub> then destruction efficiency of at least 98.5%; <u>or</u> if inlet concentration is between 200 & 2000 ppm <sub>y</sub> then destruction efficiency of at least 97%; <u>or</u> if inlet concentration < 200 ppm <sub>y</sub> then destruction efficiency of least 90%	BAAQMD Condition #14373 part 4	C	Source/A-2 and A-3 interlock system

## VII. Applicable Limits and Compliance Monitoring Requirements

**Table VII – D**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S-24 PRIMER STATION #2 AT EXTRUDER LAMINATOR #15**  
**S-25 DRYING OVEN #2 AT EXTRUDER LAMINATOR #15**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
	BAAQMD Condition #14373, Part 2	Y		Outlet NMHC concentration of 10 ppm <sub>y</sub> or less; <u>or</u> if inlet concentration > 2000 ppm <sub>y</sub> then destruction efficiency of at least 98.5%; <u>or</u> if inlet concentration is between 200 & 2000 ppm <sub>y</sub> then destruction efficiency of at least 97%; <u>or</u> if inlet concentration < 200 ppm <sub>y</sub> then destruction efficiency of at least 90%	BAAQMD Condition #14373 Part 8	P/M	Collection System Integrity Inspection
	BAAQMD Condition #14373, Part 2	Y		Outlet NMHC concentration of 10 ppm <sub>y</sub> or less; <u>or</u> if inlet concentration > 2000 ppm <sub>y</sub> then destruction efficiency of at least 98.5%; <u>or</u> if inlet concentration is between 200 & 2000 ppm <sub>y</sub> then destruction efficiency of at least 97%; <u>or</u> if inlet concentration < 200 ppm <sub>y</sub> then destruction efficiency of at least 90%	BAAQMD Condition #14373 Parts <del>15 and 16</del> 14 and 15	P/A	Source test
	BAAQMD Condition #14373, Part 3	Y		Non-complying materials must be abated by A-2 &/or A-3	BAAQMD Condition #14373 Part 4	C	<del>Temperature Chart Recorder</del> Mechanical Interlock System

## VII. Applicable Limits and Compliance Monitoring Requirements

**Table VII – D**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S-24 PRIMER STATION #2 AT EXTRUDER LAMINATOR #15**  
**S-25 DRYING OVEN #2 AT EXTRUDER LAMINATOR #15**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
	BAAQMD Condition #14373, Part 5	Y		Minimum A-2 &/or A3 inlet catalyst cell temperature of 500°F or inlet catalyst cell temperature as established by most recent source test demonstrating compliance	BAAQMD Condition #14373 Part 6	C	Temperature Chart Recorder
	BAAQMD Condition #14373, part 7	Y		Allowable temperature excursion from A-2 &/or A3 operating temperature limit	BAAQMD Condition #14373 Part 6	P/M	Temperature chart recorder
	BAAQMD Condition #14373, Part 11	Y		12.3 tons/yr	BAAQMD Condition #14373, Part 12	P/D	Primer, coatings, makeup solvent, & cleanup solvent records, calculations
	BAAQMD Condition #20229 Part 1			Single HAPs of less than 9 TPY and combine HAPs of 23 TPY	BAAQMD Condition #20229 Part 2	P/M	Coating records, calculations
HAPs	40 CFR Part 63, Subpart KK, Section 63.820(a)(2)	Y		Each affected source's HAP emissions not to exceed 10 TPY for a single HAP and a combine HAP of 25 TPY	40 CFR Part 63, Subpart KK, Section 63.829(d) & 63.830(b)(1)	P/M	HAP Material usage records and certified product data sheets

## VII. Applicable Limits and Compliance Monitoring Requirements

**Table VII – E**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S-26 Flexographic Printing Press P-5 w/Between-Color Dryers and Tunnel Dryer**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
VOC	BAAQMD 8-20-302	Y		2.5 lb VOC/gal of ink and coating ( <a href="#">during unabated operation</a> )	BAAQMD 8-20-503	P/M	Coating records
	BAAQMD 8-20-308	N		75% (wt) or greater overall VOC collection and control efficiency ( <a href="#">during abated operation</a> )	BAAQMD 8-20-505	C	Temperature Gauge
	BAAQMD 8-20-308	N		75% (wt) or greater overall VOC collection and control efficiency ( <a href="#">during abated operation</a> )	BAAQMD Condition #15238, part 3	C	Mechanical interlock system
	BAAQMD 8-20-308	N		75% (wt) or greater overall VOC collection and control efficiency ( <a href="#">during abated operation</a> )	BAAQMD Condition #14373 Parts <del>15 and 16</del> 14 and 15	P/A	Source test
	SIP 8-20-302	Y		2.5 lb VOC/gal of ink, coating, and adhesive ( <a href="#">during unabated operation</a> )	BAAQMD 8-20-503	P/M	Coating records
	SIP 8-20-308	Y		75% (wt) or greater overall VOC collection and control efficiency ( <a href="#">during abated operation</a> )	BAAQMD Condition #14373 Parts <del>15 and 16</del> 14 and 15	P/A	Source test
VOC	BAAQMD Condition #15238, Part 1	Y		39 tons/yr	BAAQMD Condition #15238, part 6	P/M	Ink, makeup solvent, & cleanup solvent records, calculations

## VII. Applicable Limits and Compliance Monitoring Requirements

**Table VII – E**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S-26 Flexographic Printing Press P-5 w/Between-Color Dryers and Tunnel Dryer**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
	BAAQMD Condition #15238, Part 2	Y		S-26 to be abated by A-2 &/or A-3	BAAQMD 8-20-308	C	Temperature Gauge Mechanical Interlock System
	BAAQMD Condition #15238, Part 3	Y		75% (wt) or greater overall VOC capture and destruction efficiency	BAAQMD 8-20-505	C	Temperature Gauge
	BAAQMD Condition #15238, Part 3	Y		75% (wt) or greater overall VOC capture and destruction efficiency	BAAQMD Condition #14373 Parts <del>15 and 16</del> 14 and 15	P/A	Source test
	BAAQMD Condition #15238, Part 5			1.0 lb VOC/gal of waterborne inks	BAAQMD Condition #15238, Part <del>6</del> 5	P/M	Coating records
	BAAQMD Condition #20229, Part 1			Single HAPs of less than 9 TPY and combine HAPs of 23 TPY	BAAQMD Condition #20229, Part 2	P/M	Coating records, calculations
HAPs	40 CFR Part 63, Subpart KK, Section 63.820(a)(2)	Y		Each affected source's HAP emissions not to exceed 10 TPY for a single HAP and a combined HAPs of 25 TPY	40 CFR Part 63, Subpart KK, Section 63.829(d) & 63.830(b)(1)	P/M	HAP Material usage records and certified product data sheets

## VIII. TEST METHODS

The test methods associated with the emission limit of a District regulation are generally referenced in Section 600 et seq. of the regulation. The following table indicates only the test methods associated with the emission limits referenced in Section VII, Applicable Emission Limits & Compliance Monitoring Requirements, of this permit.

**Table VIII**  
**Test Methods**

<b>Applicable Requirement</b>	<b>Description of Requirement</b>	<b>Acceptable Test Methods</b>
BAAQMD 6-301	Ringelmann No. 1 Limitation	Manual of Procedures, Volume I, Evaluation of Visible Emissions
BAAQMD 6-310	Particulate Weight Limitation	Manual of Procedures, Volume IV, ST-15, Particulates Sampling
BAAQMD 8-20-302	Ink and Coating VOC Content Limitations	Manual of Procedures, Volume III, Method 21, “Determination of Compliance of Volatile Organic Compounds for Water Reducible Coatings” or Method 22, ““Determination of Compliance of Volatile Organic Compounds for Solvent Based Coating”
SIP 8-20-308	Approved Emission Control System Requirements	Manual of Procedures, Volume IV, ST-7 or EPA Method 25 or 25A
BAAQMD 8-20-309	Cleaning Product Requirements	Manual of Procedures, Volume III, Method 31



## **IX. PERMIT SHIELD**

**Not Applicable**

## **X. REVISION HISTORY**

**Title V Permit Issuance:**

**November 6, 2001**

**Significant Revision:**

**May 6, 2003**

Purpose: to allow the use of solvent-based coatings at the facility with additional controls and to impose synthetic minor conditions to allow the facility to be an area source with regards to 40 CFR 63, Subpart KK.

## **XI. GLOSSARY**

**ACT**

Federal Clean Air Act

**BAAQMD**

Bay Area Air Quality Management District

**BACT**

Best Available Control Technology

**CAA**

The federal Clean Air Act

**CAAQS**

California Ambient Air Quality Standards

**CEQA**

California Environmental Quality Act

**CFR**

The Code of Federal Regulations. 40 CFR contains the implementing regulations for federal environmental statutes such as the Clean Air Act. Parts 50-99 of 40 CFR contain the requirements for air pollution programs.

**CO**

Carbon Monoxide

**Cumulative Increase**

The sum of permitted emissions from each new or modified source since a specified date pursuant to BAAQMD Rule 2-1-403, Permit Conditions (as amended by the District Board on 7/17/91) and SIP Rule 2-1-403, Permit Conditions (as approved by EPA on 6/23/95). Used to determine whether threshold-based requirements are triggered.

**District**

The Bay Area Air Quality Management District

**EPA**

The federal Environmental Protection Agency.

**Excluded**

Not subject to any District Regulations.

## **X. Glossary**

### **Federally Enforceable, FE**

All limitations and conditions which are enforceable by the Administrator of the EPA including those requirements developed pursuant to 40 CFR Part 51, subpart I (NSR), Part 52.21 (PSD), Part 60 (NSPS), Part 61 (NESHAPs), Part 63 (HAP), and Part 72 (Permits Regulation, Acid Rain), and also including limitations and conditions contained in operating permits issued under an EPA-approved program that has been incorporated into the SIP.

### **HAP**

Hazardous Air Pollutant. Any pollutant listed pursuant to Section 112(b) of the Act. Also refers to the program mandated by Title I, Section 112, of the Act and implemented by both 40 CFR Part 63

### **Major Facility**

All limitations and conditions which are enforceable by the Administrator of the EPA including those requirements developed pursuant to 40 CFR Part 51, subpart I (NSR), Part 52.21 (PSD), Part 60 (NSPS), Part 61 (NESHAPs), Part 63 (HAP), and Part 72 (Permits Regulation, Acid Rain), and also including limitations and conditions contained in operating permits issued under an EPA-approved program that has been incorporated into the SIP.

### **MFR**

Major Facility Review. The District's term for the federal operating permit program mandated by Title V of the Act and implemented by District Regulation 2, Rule 6.

### **MOP**

The District's Manual of Procedures.

### **NAAQS**

National Ambient Air Quality Standards

### **NESHAPs**

National Emission Standards for Hazardous Air Pollutants. See in 40 CFR Part 61.

### **NMHC**

Non-methane Hydrocarbons

### **NO<sub>x</sub>**

Oxides of nitrogen.

### **NSPS**

Standards of Performance for New Stationary Sources. Federal standards for emissions from new stationary sources. Mandated by Title I, Section 111 of the Act, and implemented by 40 CFR Part 60 and District Regulation 10.

### **NSR**

New Source Review. A federal program for pre-construction review and permitting of new

## **X. Glossary**

and modified sources of air pollutants for which the District is classified "non-attainment". Mandated by Title I of the Clean Air Act and implemented by 40 CFR Parts 51 and 52 as well as District Regulation 2, Rule 2. (Note: There are additional NSR requirements mandated by the California Clean Air Act.)

### **Offset Requirement**

A New Source Review requirement to provide federally enforceable emission offsets at a specified ratio for the emissions from a new or modified source and any pre-existing cumulative increase minus any onsite contemporaneous emission reduction credits. Applies to emissions of POC, NO<sub>x</sub>, PM<sub>10</sub>, and SO<sub>2</sub>.

### **Phase II Acid Rain Facility**

A facility that generates electricity for sale through fossil-fuel combustion and is not exempted by 40 CFR 72 from Titles IV and V of the Clean Air Act.

### **POC**

Precursor Organic Compounds

### **PM**

Total Particulate Matter

### **PM10**

Particulate matter with aerodynamic equivalent diameter of less than or equal to 10 microns

### **PSD**

Prevention of Significant Deterioration. A federal program for permitting new and modified sources of air pollutants for which the District is classified "attainment" of the National Air Ambient Quality Standards. Mandated by Title I of the Act and implemented by both 40 CFR Part 52 and District Regulation 2, Rule 2.

### **Synthetic Minor Operating Permit**

A District operating permit that has been modified to include conditions imposing enforceable permit conditions on a facility or source. A synthetic minor operating permit is subject to all the provisions of District Regulations 1, 2, and 3, including, but not limited to, permitting, compliance, and fee requirements.

### **SIP**

State Implementation Plan. State and District programs and regulations approved by EPA and developed in order to attain the National Air Ambient Quality Standards. Mandated by Title I of the Act.

### **SO<sub>2</sub>**

Sulfur dioxide

### **Title V**

Title V of the federal Clean Air Act. Requires a federally enforceable operating permit program for major and certain other facilities.

## X. Glossary

### VOC

Volatile Organic Compounds

#### Units of Measure:

Bhp	=	brake-horsepower
Btu	=	British thermal unit
g	=	grams
gal	=	gallon
hp	=	horsepower
hr	=	hour
lb	=	pound
in	=	inches
max	=	maximum
m <sup>2</sup>	=	square meter
min	=	minute
mm	=	million
ppmv	=	parts per million, by volume
ppmw	=	parts per million, by weight
psia	=	pounds per square inch, absolute
psig	=	pounds per square inch, gauge
scfm	=	standard cubic feet per minute
yr	=	year

## **XII. APPLICABLE STATE IMPLEMENTATION PLAN**

The Bay Area Air Quality Management District's portion of the State Implementation Plan can be found at EPA Region 9's website. The address is:

<http://yosemite1.epa.gov/r9/r9sips.nsf/California?ReadForm&Start=1&Count=30&Expand=3.1>