

# 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:**  
**SKC America, Inc.**  
**Facility # A9248**

**Facility Address:**  
307 N. Pastoria Ave.  
Sunnyvale, CA 94086

**Mailing Address:**  
307 N. Pastoria Ave.  
Sunnyvale, CA 94086

**Responsible Official**  
Zora Ljoljic, Vice President  
(408) 739-4170

**Facility Contact**  
Richard Rosdail, Facilities Maintenance,  
Environmental Health & Safety Manager  
(408) 739-4170, ext. 2241

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**Type of Facility:** Film Products Manufacturer  
**Primary SIC:** 3081  
**Product:** Film Products

**BAAQMD Permit Division Contact:**  
M.K. Carol Lee

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

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Ellen Garvey, Executive Officer/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 10/7/98);

SIP Regulation 1 - General Provisions and Definitions  
(as approved by EPA through 8/27/99);

BAAQMD Regulation 2, Rule 1 - Permits, General Requirements  
(as amended by the District Board on 10/7/98);

SIP Regulation 2, Rule 1 - Permits, General Requirements  
(as approved by EPA through 2/25/99);

BAAQMD Regulation 2, Rule 2 - Permits, New Source Review  
(as amended by the District Board on 10/7/98);

SIP Regulation 2, Rule 2 - Permits, New Source Review and Prevention of Significant Deterioration  
(as approved by EPA through 2/25/99);

BAAQMD Regulation 2, Rule 4 - Permits, Emissions Banking  
(as amended by the District Board on 10/7/98); and

SIP Regulation 2, Rule 4 - Permits, Emissions Banking  
(as approved by EPA through 2/25/99).

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

1. This Major Facility Review Permit was issued on [ ] and expires on [when issued, enter 5<sup>th</sup> anniversary of issue date]. The permit holder shall submit a complete application for renewal of this Major Facility Review Permit no later than [when issued, enter date 6 months prior to permit expiration date] and no earlier than [when issued, enter date 12 months prior to expiration date]. **If a complete application for renewal has not been submitted in accordance with these deadlines, the facility may not operate after** [when issued, enter 5<sup>th</sup> anniversary of issue date]. (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)

## **I. Standard Conditions**

5. The filing of a request by the facility for a permit modification, revocation and re-issuance, or termination, or 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, nor 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 which 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)

### **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 which 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**

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 [date of issuance] to [six months later]. The

## I. Standard Conditions

report shall be submitted by [one month after end of reporting period]. Subsequent reports shall be for the following periods: [\_\_\_\_ 1st through \_\_\_\_ 30th or 31st] and [\_\_\_\_ 1st through \_\_\_\_ 30th or 31st], 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  
Bay Area Air Quality Management District  
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 \_\_\_\_\_ 1st to \_\_\_\_\_ 30th or 31st. The certification shall be submitted by \_\_\_\_\_ 30th or 31st 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 breakdown, as defined by Regulation 1-208 of the District's Rules and Regulations, by

## **I. Standard Conditions**

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 caused by conditions beyond the permit holder's reasonable control 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. Any variance granted by the Hearing Board from any term or condition of this permit that lasts longer than 90 days will be subject to EPA approval. (MOP Volume II, Part 3, §4.8)
3. Notwithstanding the foregoing, 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)

## 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.

| S# | Description   | Make or Type                       | Model      | Capacity            |
|----|---|------------------------------------|------------|---------------------|
| 1  | Polymer Vessel  | Pfaudler Reactor                   | #E374-0068 | 500 Gallon Capacity |
| 2  | Line #1 Sub-Coater  | In-house Design                    | N/A        | 150 FPM             |
| 3  | Line #1 – Sub-Coat Dryer (Heat Recovery – No Fuel Used)         | In-house Design                    | N/A        | 150 FPM             |
| 4  | Line #1 – Top Coater  | Inta-Roto Coating Machine          | N/A        | 150 FPM             |
| 5  | Line #1 Top Coat Dryer (Heat Recovery – No Fuel Used)           | Inta-Roto Film Coating Dryer       | N/A        | N/A                 |
| 6  | Vessel Unloading Surge Tank                                     | N/A                                | N/A        | 500 Gallon Tank     |
| 20 | Line #3 Sub-Coater  | Inta-Roto Rotogravure Coater       | N/A        | N/A                 |
| 21 | Line #3 Sub-Coat Dryer (Heat Recovery – No Fuel Used)           | Midland-Ross Dryer                 | N/A        | N/A                 |
| 22 | Top Roller Coater, Line #3                                      | Waldron-Hartig Y-1000 Coater       | N/A        | N/A                 |
| 23 | Top Dryer, Coating Oven, Line #3 (Heat Recovery – No Fuel Used) | Midland Ross Dryer                 | N/A        | N/A                 |
| 30 | Holding Tank, Vesicular, T-322                                  | Stainless Steel Kettle             | N/A        | 600 Gallon          |
| 32 | Mix Tank, Diazo, T-311  | Stainless Steel Kettle             | N/A        | 600 Gallon          |
| 33 | Holding Tank, Diazo, T-321                                      | Stainless Steel Kettle             | N/A        | 600 Gallon          |
| 34 | Mix Tank, Vesicular, T-312                                      | Stainless Steel Kettle             | N/A        | 600 Gallon          |
| 36 | Polymer Holding Kettle  | Jacketed S.S. Kettle               | N/A        | 528 Gallon          |
| 53 | Custom Cold Solvent Sink  | N/A                                | N/A        | N/A                 |
| 56 | Centrifuge Decanter   | Sharples Horizontal Super-D-Canter | P3400      | N/A                 |
| 57 | A/S Kettle  | Chem-Tek Jovs                      | N/A        | N/A                 |
| 58 | Chemical Transporter (contained)                                | Custom-Made                        | N/A        | N/A                 |

## 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.

| S#  | Description  | Make or Type                                  | Model | Capacity   |
|-----|--|---|-------|------------|
| 60  | Vesicular side feed tank T-332                     | Perma-san Jovs                                | N/A   | 3 gal/hr   |
| 61  | Spare Vesic mix Live #3 T-333                      | Chem-Tek Jovs                                 | N/A   | N/A        |
| 70  | Mixing Kettle T-100, 225 Gallon Capacity           | Process Equipment Corporation, Chem-Tek JOVS, | N/A   | 9 gal/hr   |
| 71  | Hold Tank, T-200, 225 Gallon Capacity              | Process Equipment Corporation, Chem-Tek JOVS, | N/A   | 9 gal/hr   |
| 72  | Feed Tank, Mezzanine Level, 225 Gallon Capacity    | Process Equipment Corporation, Chem-Tek JOVS, | N/A   | 9 gal/hr   |
| 73  | Sub Mix Tank, Line #1, 225 Gallon Capacity         | Process Equipment Corporation, Chem-Tek JOVS, | N/A   | 4.9 gal/hr |
| 74  | Sub Mix Tank, Line # 3, 225 Gallon Capacity        | Process Equipment Corporation, Chem-Tek JOVS, | N/A   | 13 gal/hr  |
| 77  | Flexographic Striper for 105mm Duplicate Microfilm | Manhasset                                     | N/A   | 150 ft/min |
| 78  | Flexographic Striper for 105mm Duplicate Microfilm | Manhasset                                     | N/A   | 150 ft/min |
| 79  | Flexographic Striper for 105mm Duplicate Microfilm | Manhasset                                     | N/A   | 150 ft/min |
| 80  | 59" Flexographic Striper for Microfilm             | Faust   | FWS   | N/A        |
| 81  | Custom Cold Solvent Sink - Striping Operation      | Custom Made                                   | N/A   | N/A        |
| 82  | Pilot Line Roller Coater/Electric Dryer            | Talboys; T-Line Coater; 13.5" machine width;  | N/A   | 100 ft/min |
| 100 | Facility Wipe Cleaning Permit                      | N/A   | N/A   | N/A        |

## 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.

| <b>S#</b> | <b>Description</b>              | <b>Make or Type</b> | <b>Model</b> | <b>Capacity</b>        |
|-----------|---------------------------------|---------------------|--------------|------------------------|
| 200       | Joor 10,000 Gallon Storage Tank | Joor                | N/A          | 10,000 Gallon Capacity |
| 201       | Joor 10,000 Gallon Storage Tank | Joor                | N/A          | 10,000 Gallon Capacity |
| 202       | Joor 10,000 Gallon Storage Tank | Joor                | N/A          | 10,000 Gallon Capacity |
| 203       | Joor 10,000 Gallon Storage Tank | Joor                | N/A          | 10,000 Gallon Capacity |
| 204       | Joor 10,000 Gallon Storage Tank | Joor                | N/A          | 10,000 Gallon Capacity |

## II. Equipment

**Table II B – Abatement Devices**

| <b>A#</b> | <b>Description</b> | <b>Source(s)<br/>Controlled</b>  | <b>Applicable<br/>Requirement</b>   | <b>Operating<br/>Parameters</b>                       | <b>Limit or<br/>Efficiency</b>   |
|-----------|--------------------|----------------------------------|---|---|--|
| 24        | Thermal Oxidizer   | S77, S78,<br>S79, S80            | District<br>Regulation<br>8-20-308;<br>District<br>Condition<br># 12974<br>Part 3 | Minimum operating<br>temperature of<br>1450 degrees F | POC<br>destruction<br>efficiency $\geq$<br>98.5 % wt. &<br>Overall POC<br>abatement<br>efficiency $\geq$<br>75 % wt. |
| 25        | Thermal Oxidizer   | S3, S5,<br>S21, S23,<br>S56, S82 | District<br>Regulation<br>8-12-301.2  | Minimum operating<br>temperature of 1400<br>degrees F | VOC<br>emissions $\leq$<br>1.0 lb<br>VOC/gal   |
|           |                    | S3, S5,<br>S21, S23,<br>S56, S82 | District<br>Condition #<br>1132 Part 1  | Minimum operating<br>temperature of 1400<br>degrees F | Overall POC<br>abatement<br>efficiency $\geq$<br>95 wt. %  |

### 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
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 included in Appendix A of this permit if the SIP requirement is different from the current BAAQMD requirement.

**NOTE:**

There are differences between the current BAAQMD rule and the version of the rule in the SIP. For specific information, contact the District's Rule Development Section of the Enforcement Division. 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**

| Applicable Requirement | Regulation Title or Description of Requirement | Federally Enforceable (Y/N) |
|------------------------|--|-----------------------------|
| BAAQMD Regulation 1    | General Provisions and Definitions (10/7/98)   | N                           |
| SIP Regulation 1       | General Provisions and Definitions (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                           |

### 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 5           | Open Burning (11/2/94)   | N                                  |
| BAAQMD Regulation 6           | Particulate Matter and Visible Emissions (12/19/90)                                | N                                  |
| BAAQMD Regulation 7           | Odororous 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                                  |
| BAAQMD Regulation 8, Rule 22  | Organic Compounds – Valves and Flanges at Chemical Plants (06/01/94)               | 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 8, Rule 51  | Organic Compounds - Adhesive and Sealant Products (12/20/95)                       | N                                  |
| 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)                    | Y                                  |
| EPA Regulation 40 CFR 82      | Protection of Stratospheric Ozone (2/21/95)  |                                    |
| Subpart F, 40 CFR 82.156      | Leak Repair  | Y                                  |
| Subpart F, 40 CFR 82.161      | Certification of Technicians   | Y                                  |
| Subpart F, 40 CFR 82.166      | Records of Refrigerant   | 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
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 included in Appendix A of this permit if the SIP requirements are different from the current BAAQMD requirements. All other text may be found in the regulations themselves.

**Table IV - A**  
**Source-specific Applicable Requirements**  
**S1 - POLYMER VESSEL**

| Applicable Requirement              | Regulation Title or Description of Requirement                       | Federally Enforceable (Y/N) | Future Effective Date |
|-------------------------------------|--|-----------------------------|-----------------------|
| <b>BAAQMD Regulation 8, Rule 36</b> | <b>Resin Manufacturing (06/06/84)</b>                                |                             |                       |
| 8-36-301                            | Resin Reactors, Thinning Tanks, and Blending Tanks                   | Y                           |                       |
| 8-36-301.2                          | POC $\leq$ 10 lb/day   | Y                           |                       |
| <b>BAAQMD Condition # 17003</b>     |  |                             |                       |
| Part 1                              | Vessel shall not be vented during normal operations (basis: 2-1-403) | Y                           |                       |
| Part 2                              | Vessel gasket inspections (basis: 2-1-403)                           | Y                           |                       |

#### IV. Source-Specific Applicable Requirements

**Table IV - B**  
**Source-specific Applicable Requirements**  
**S6 – VESSEL UNLOADING SURGE TANK**  
**S36 – POLYMER HOLDING KETTLE**

| Applicable Requirement             | Regulation Title or Description of Requirement                      | Federally Enforceable (Y/N) | Future Effective Date |
|------------------------------------|---|-----------------------------|-----------------------|
| <b>BAAQMD Regulation 8, Rule 5</b> | <b>Storage of Organic Liquids (01/20/93)</b>                        |                             |                       |
| 8-5-301.1                          | Storage Tanks Smaller than 150 m <sup>3</sup> , Submerged Fill Pipe | Y                           |                       |
| 8-5-501                            | Records   | Y                           |                       |

**Table IV – C**  
**Source-specific Applicable Requirements**  
**S2 – LINE # 1 SUB-COATER**  
**S3 – LINE # 1 SUB-COAT DRYER**  
**S4– LINE # 1 – TOP COATER**  
**S5– LINE # 1 TOP COAT DRYER**  
**S20 – LINE # 3 SUB-COATER**  
**S21 – LINE # 3 SUB-COAT DRYER**  
**S22 – TOP ROLLER COATER, LINE # 3**  
**S23– TOP DRYER, COATING OVEN, LINE # 3**

| Applicable Requirement              | Regulation Title or Description of Requirement   | Federally Enforceable (Y/N) | Future Effective Date |
|-------------------------------------|--|-----------------------------|-----------------------|
| <b>BAAQMD Regulation 8, Rule 12</b> | <b>Paper, Fabric and Film Coating (12/20/95)</b> |                             |                       |
| 8-12-301                            | Limitations, Coating Lines                       | Y                           |                       |
| 8-12-301.2                          | Approved Emission Control System                 | Y                           |                       |
| 8-12-305                            | Surface Preparation and Cleanup Solvent          | Y                           |                       |
| 8-12-501                            | Coating Records                                  | Y                           |                       |

#### IV. Source-Specific Applicable Requirements

**Table IV – C**  
**Source-specific Applicable Requirements**  
**S2 – LINE # 1 SUB-COATER**  
**S3 – LINE # 1 SUB-COAT DRYER**  
**S4– LINE # 1 – TOP COATER**  
**S5– LINE # 1 TOP COAT DRYER**  
**S20 – LINE # 3 SUB-COATER**  
**S21 – LINE # 3 SUB-COAT DRYER**  
**S22 – TOP ROLLER COATER, LINE # 3**  
**S23– TOP DRYER, COATING OVEN, LINE # 3**

| Applicable Requirement         | Regulation Title or Description of Requirement                          | Federally Enforceable (Y/N) | Future Effective Date |
|--------------------------------|---|-----------------------------|-----------------------|
| <b>BAAQMD Condition # 1132</b> |   |                             |                       |
| Part 1                         | Abatement Efficiency (basis: BACT; Cumulative Increase)                 | Y                           |                       |
| Part 4                         | Pressure Drop (basis: Regulation 2-1-403)                               | Y                           |                       |
| Part 5                         | Minimum Temperature (basis: Regulation 2-1-403)                         | Y                           |                       |
| Part 6                         | Temperature Monitoring Device (basis: Regulation 1-521)                 | Y                           |                       |
| Part 7                         | Source Test (basis: Regulation 2-1-403)                                 | Y                           |                       |
| Part 8                         | Lowering Minimum Temperature (basis: Regulation 2-1-403)                | Y                           |                       |
| Part 9                         | Allowable Temperature Excursions (basis: Regulation 2-1-403)            | Y                           |                       |
| Part 10                        | Records of Allowable Temperature Excursions (basis: Regulation 2-1-403) | Y                           |                       |
| Part 11                        | Temperature Recordkeeping (basis: Regulation 8-12-501.3)                | Y                           |                       |

#### IV. Source-Specific Applicable Requirements

**Table IV - D**  
**Source-specific Applicable Requirements**  
**S30 – HOLDING TANK, VESICULAR, T-322**  
**S32–MIX TANK, DIAZO, T-321**  
**S33– HOLDING TANK, DIAZO, T-321**  
**S34 – MIX TANK, VESICULAR, T-312**  
**S36 – POLYMER HOLDING KETTLE**  
**S57–A/S KETTLE**  
**S58– CHEMICAL TRANSPORTER (CONTAINED)**  
**S60– VESICULAR SIDE FEED TANK T-332**  
**S61 – SPARE VESIC MIX LIVE # 3 T-333**

| Applicable Requirement       | Regulation Title or Description of Requirement | Federally Enforceable (Y/N) | Future Effective Date |
|------------------------------|--|-----------------------------|-----------------------|
| BAAQMD Regulation 8, Rule 12 | Paper, Fabric and Film Coating                 |                             |                       |
| 8-12-302                     | Storage and Mixing Operations                  | Y                           |                       |
| 8-12-305                     | Surface Preparation and Cleanup Solvent        | Y                           |                       |

**Table IV - E**  
**Source-specific Applicable Requirements**  
**S53 – CUSTOM COLD SOLVENT SINK**

| Applicable Requirement       | Regulation Title or Description of Requirement  | Federally Enforceable (Y/N) | Future Effective Date |
|------------------------------|---|-----------------------------|-----------------------|
| BAAQMD Regulation 8, Rule 16 | Organic Compounds - Solvent Cleaning Operations |                             |                       |
| 8-16-303                     | Cold Cleaner Requirements                       | N                           |                       |
| 8-16-303.1                   | General Operating Requirements                  | Y                           |                       |
| 8-16-303.1.1                 | Proper Operation and Maintenance                | Y                           |                       |
| 8-16-303.1.2                 | Leak Repair Requirement                         | Y                           |                       |
| 8-16-303.1.3                 | Prevention of Evaporation of Solvent            | Y                           |                       |

#### IV. Source-Specific Applicable Requirements

**Table IV - E**  
**Source-specific Applicable Requirements**  
**S53 – CUSTOM COLD SOLVENT SINK**

| <b>Applicable Requirement</b>    | <b>Regulation Title or Description of Requirement</b>  | <b>Federally Enforceable (Y/N)</b> | <b>Future Effective Date</b> |
|----------------------------------|--|------------------------------------|------------------------------|
| 8-16-303.1.4                     | Waste Solvent  | Y                                  |                              |
| 8-16-303.1.5                     | Solvent Covers/Remote Reservoirs   | Y                                  |                              |
| 8-16-303.1.6                     | Solvent Spray  | N                                  |                              |
| 8-16-303.2                       | Cold Cleaner Operating Requirements  | Y                                  |                              |
| 8-16-303.3                       | Cold Cleaner General Equipment Requirements  | Y                                  |                              |
| 8-16-303.4                       | Cold Cleaner Control Devices   | Y                                  |                              |
| 8-16-303.5                       | Multiple Cold Cleaner Requirements   | N                                  |                              |
| 8-16-501                         | Solvent Records  | N                                  |                              |
| 8-16-501.2                       | Facility-wide, Annual Records of Make-up Solvent   | N                                  |                              |
| 8-16-501.3                       | Annual Records of Solvent Subject to 8-16-111  | N                                  |                              |
| 8-16-501.5                       | Records Made Available to APCO   | N                                  |                              |
| 8-16-501.6                       | Other Information (i.e., Purchase Orders or Hazardous Waste Manifests)                                     | N                                  |                              |
| <b>SIP Regulation 8, Rule 16</b> | <b>PROVISIONS NO LONGER IN CURRENT RULE<br/>Organic Compounds - Solvent Cleaning Operations (12/09/94)</b> |                                    |                              |
| 8-16-303                         | Cold Cleaner Requirements  | Y <sup>1</sup>                     |                              |
| 8-16-303.1.6                     | Solvent Spray  | Y <sup>1</sup>                     |                              |
| 8-16-501                         | Solvent Records  | Y <sup>1</sup>                     |                              |
| 8-16-501.2                       | All Other Solvents   | Y <sup>1</sup>                     |                              |

<sup>1</sup> This section has been removed from BAAQMD Regulations because it has been superseded. Nevertheless, the source must comply with this regulation until US EPA has reviewed and approved (or disapproved) the District's revision of the regulation.

## IV. Source-Specific Applicable Requirements

**Table IV - F**  
**Source-specific Applicable Requirements**  
**S56 – CENTRIFUGE DECANTER**

| <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 8, Rule 36</b> | <b>Resin Manufacturing (06/06/84)</b>                                   |                                    |                              |
| 8-36-301                            | Resin Reactors, Thinning Tanks, and Blending Tanks                      | Y                                  |                              |
| 8-36-301.1                          | Overall POC Abatement $\geq$ 95 % wt.                                   | Y                                  |                              |
| <b>BAAQMD Condition # 1132</b>      |   |                                    |                              |
| Part 1                              | Abatement Efficiency (basis: BACT; Cumulative Increase)                 | Y                                  |                              |
| Part 2                              | Usage (basis: Cumulative Increase)                                      | Y                                  |                              |
| Part 3                              | Records (basis: Cumulative Increase)                                    | Y                                  |                              |
| Part 4                              | Pressure Drop (basis: Regulation 2-1-403)                               | Y                                  |                              |
| Part 5                              | Minimum Temperature (basis: Regulation 2-1-403)                         | Y                                  |                              |
| Part 6                              | Temperature Monitoring Device (basis: Regulation 1-521)                 | Y                                  |                              |
| Part 7                              | Source Test (basis: Regulation 2-1-403)                                 | Y                                  |                              |
| Part 8                              | Lowering Minimum Temperature (basis: Regulation 2-1-403)                | Y                                  |                              |
| Part 9                              | Allowable Temperature Excursions (basis: Regulation 2-1-403)            | Y                                  |                              |
| Part 10                             | Records of Allowable Temperature Excursions (basis: Regulation 2-1-403) | Y                                  |                              |
| Part 11                             | Temperature Recordkeeping (basis: Regulation 8-12-501.3)                | Y                                  |                              |

#### IV. Source-Specific Applicable Requirements

**Table IV - G**  
**Source-specific Applicable Requirements**  
**S70 – MIXING KETTLE T-100, 225 GALLON CAPACITY**  
**S71 – HOLD TANK, T-200, 225 GALLON CAPACITY**  
**S72– FEED TANK, MEZZANINE LEVEL, 225 GALLON CAPACITY**

| Applicable Requirement       | Regulation Title or Description of Requirement | Federally Enforceable (Y/N) | Future Effective Date |
|------------------------------|--|-----------------------------|-----------------------|
| BAAQMD Regulation 8, Rule 12 | Paper, Fabric and Film Coating                 |                             |                       |
| 8-12-302                     | Storage and Mixing Operations                  | Y                           |                       |
| 8-12-305                     | Surface Preparation and Cleanup Solvent        | Y                           |                       |
| BAAQMD Condition # 15371     |  |                             |                       |
| Part 1                       | Usage (basis: Cumulative Increase)             | Y                           |                       |
| Part 2                       | Usage (basis: Cumulative Increase)             | Y                           |                       |
| Part 3                       | Records (basis: Cumulative Increase)           | Y                           |                       |

**Table IV - H**  
**Source-specific Applicable Requirements**  
**S73 – SUB-MIX TANK, LINE # 1, 225 GALLON CAPACITY**  
**S74 – SUB-MIX TANK, LINE # 3, 225 GALLON CAPACITY**

| Applicable Requirement       | Regulation Title or Description of Requirement | Federally Enforceable (Y/N) | Future Effective Date |
|------------------------------|--|-----------------------------|-----------------------|
| BAAQMD Regulation 8, Rule 12 | Paper, Fabric and Film Coating                 |                             |                       |
| 8-12-302                     | Storage and Mixing Operations                  | Y                           |                       |
| 8-12-305                     | Surface Preparation and Cleanup Solvent        | Y                           |                       |

#### IV. Source-Specific Applicable Requirements

**Table IV - H**  
**Source-specific Applicable Requirements**  
**S73 – SUB-MIX TANK, LINE # 1, 225 GALLON CAPACITY**  
**S74 – SUB-MIX TANK, LINE # 3, 225 GALLON CAPACITY**

| Applicable Requirement         | Regulation Title or Description of Requirement | Federally Enforceable (Y/N) | Future Effective Date |
|--------------------------------|--|-----------------------------|-----------------------|
| <b>BAAQMD Condition # 7612</b> |  |                             |                       |
| Part 1                         | Usage (basis: Cumulative Increase)             | Y                           |                       |
| Part 2                         | Records (basis: Cumulative Increase)           | Y                           |                       |

**Table IV - I**  
**Source-specific Applicable Requirements**  
**S77 – FLEXOGRAPHIC STRIPER FOR 105MM DUPLICATE MICROFILM**  
**S78 – FLEXOGRAPHIC STRIPER FOR 105MM DUPLICATE MICROFILM**  
**S79 – FLEXOGRAPHIC STRIPER FOR 105MM DUPLICATE MICROFILM**  
**S80 – 59” FLEXOGRAPHIC STRIPER FOR MICROFILM**

| 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 (03/3/99)</b>                                      |                             |                       |
| 8-20-308                            | Approved Emission Control System Requirements  | Y                           |                       |
| 8-20-309                            | Cleaning Products Requirements   | N                           |                       |
| 8-20-320                            | Solvent Evaporative Loss Minimization  | Y                           |                       |
| 8-20-503                            | Records  | N                           |                       |
| 8-20-505                            | Emission Control System Monitoring   | Y                           |                       |
| 8-20-506                            | Emission Control System, Recordkeeping Requirements  | Y                           |                       |
| <b>SIP Regulation 8, Rule 20</b>    | <b>PROVISIONS NO LONGER IN CURRENT RULE</b><br><b>Graphic Arts Printing and Coating Operations</b> |                             |                       |
| 8-20-503                            | Records  | Y                           |                       |

#### IV. Source-Specific Applicable Requirements

**Table IV - I**  
**Source-specific Applicable Requirements**  
**S77 – FLEXOGRAPHIC STRIPER FOR 105MM DUPLICATE MICROFILM**  
**S78 – FLEXOGRAPHIC STRIPER FOR 105MM DUPLICATE MICROFILM**  
**S79 – FLEXOGRAPHIC STRIPER FOR 105MM DUPLICATE MICROFILM**  
**S80 – 59” FLEXOGRAPHIC STRIPER FOR MICROFILM**

| <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 Condition # 12974</b> |   |                                    |                              |
| Part 1                          | Thermal Oxidizer (basis: BACT; Cumulative Increase)   | Y                                  |                              |
| Part 2                          | POC Destruction and Overall Capture/Destruction Efficiency (basis: BACT; Cumulative Increase) | Y                                  |                              |
| Part 3                          | Minimum Temperature (basis: Regulation 2-1-403)   | Y                                  |                              |
| Part 4                          | Continuous Temperature Monitor (basis: 1-521)   | Y                                  |                              |
| Part 5                          | Usage (basis: Cumulative Increase)  | Y                                  |                              |
| Part 6                          | Usage (basis: Cumulative Increase)  | Y                                  |                              |
| Part 8                          | Records (basis: Cumulative Increase)  | Y                                  |                              |
| Part 9                          | Pressure Drop (basis: Regulation 2-1-403)   | Y                                  |                              |
| Part 10                         | Source Test (basis: Regulation 2-1-403)   | Y                                  |                              |
| Part 11                         | Lowering Minimum Temperature (basis: Regulation 2-1-403)                                      | Y                                  |                              |
| Part 12                         | Allowable Temperature Excursions (basis: Regulation 2-1-403)                                  | Y                                  |                              |
| Part 13                         | Records of Allowable Temperature Excursions (basis: Regulation 2-1-403)                       | Y                                  |                              |
| Part 14                         | Temperature Recordkeeping (Regulation 8-12-501.3)   | Y                                  |                              |

## IV. Source-Specific Applicable Requirements

**Table IV - J**  
**Source-specific Applicable Requirements**  
**S81 – CUSTOM COLD SOLVENT SINK - STRIPING OPERATION**

| <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 8, Rule 16</b> | <b>Organic Compounds - Solvent Cleaning Operations</b>   |                                    |                              |
| 8-16-303                            | Cold Cleaner Requirements  | N                                  |                              |
| 8-16-303.1                          | General Operating Requirements   | Y                                  |                              |
| 8-16-303.1.1                        | Proper Operation and Maintenance   | Y                                  |                              |
| 8-16-303.1.2                        | Leak Repair Requirement  | Y                                  |                              |
| 8-16-303.1.3                        | Prevention of Evaporation of Solvent   | Y                                  |                              |
| 8-16-303.1.4                        | Waste Solvent  | Y                                  |                              |
| 8-16-303.1.5                        | Solvent Covers/Remote Reservoirs   | Y                                  |                              |
| 8-16-303.1.6                        | Solvent Spray  | N                                  |                              |
| 8-16-303.2                          | Cold Cleaner Operating Requirements  | Y                                  |                              |
| 8-16-303.3                          | Cold Cleaner General Equipment Requirements  | Y                                  |                              |
| 8-16-303.4                          | Cold Cleaner Control Devices   | Y                                  |                              |
| 8-16-303.5                          | Multiple Cold Cleaner Requirements   | N                                  |                              |
| 8-16-501                            | Solvent Records  | N                                  |                              |
| 8-16-501.2                          | Facility-wide, Annual Records of Make-up Solvent   | N                                  |                              |
| 8-16-501.3                          | Annual Records of Solvent Subject to 8-16-111  | N                                  |                              |
| 8-16-501.5                          | Records Made Available to APCO   | N                                  |                              |
| 8-16-501.6                          | Other Information (i.e., Purchase Orders or Hazardous Waste Manifests)   | N                                  |                              |
| <b>SIP Regulation 8, Rule 16</b>    | <b>PROVISIONS NO LONGER IN CURRENT RULE</b><br><b>Organic Compounds - Solvent Cleaning Operations (12/09/94)</b> |                                    |                              |
| 8-16-303                            | Cold Cleaner Requirements  | Y <sup>1</sup>                     |                              |

<sup>1</sup> This section has been removed from BAAQMD Regulations because it has been superseded. Nevertheless, the source must comply with this regulation until US EPA has reviewed and approved (or disapproved) the District's revision of the regulation

#### IV. Source-Specific Applicable Requirements

**Table IV - J**  
**Source-specific Applicable Requirements**  
**S81 – CUSTOM COLD SOLVENT SINK - STRIPING OPERATION**

| <b>Applicable Requirement</b>   | <b>Regulation Title or Description of Requirement</b> | <b>Federally Enforceable (Y/N)</b> | <b>Future Effective Date</b> |
|---------------------------------|---|------------------------------------|------------------------------|
| 8-16-303.1.6                    | Solvent Spray   | Y <sup>1</sup>                     |                              |
| 8-16-501                        | Solvent Records                                       | Y <sup>1</sup>                     |                              |
| 8-16-501.2                      | All Other Solvents                                    | Y <sup>1</sup>                     |                              |
| <b>BAAQMD Condition # 12974</b> |   |                                    |                              |
| Part 7                          | Usage (basis: Cumulative Increase)                    | Y                                  |                              |
| Part 8                          | Records (basis: Cumulative Increase)                  | Y                                  |                              |

**Table IV - K**  
**Source-specific Applicable Requirements**  
**S82 – PILOT LINE ROLLER COATER/ELECTRIC 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 8, Rule 12</b> | <b>Paper, Fabric and Film Coating</b>                   |                                    |                              |
| 8-12-301                            | Limitations, Coating Lines                              | Y                                  |                              |
| 8-12-301.2                          | Approved Emission Control System                        | Y                                  |                              |
| 8-12-305                            | Surface Preparation and Cleanup Solvent                 | Y                                  |                              |
| 8-12-501                            | Coating Records   | Y                                  |                              |
| <b>BAAQMD Condition # 1132</b>      |   |                                    |                              |
| Part 1                              | Abatement Efficiency (basis: BACT; Cumulative Increase) | Y                                  |                              |
| Part 2                              | Usage (basis: Cumulative Increase)                      | Y                                  |                              |
| Part 3                              | Records (basis: Cumulative Increase)                    | Y                                  |                              |

#### IV. Source-Specific Applicable Requirements

**Table IV - K**  
**Source-specific Applicable Requirements**  
**S82 – PILOT LINE ROLLER COATER/ELECTRIC DRYER**

| <b>Applicable Requirement</b> | <b>Regulation Title or Description of Requirement</b>                   | <b>Federally Enforceable (Y/N)</b> | <b>Future Effective Date</b> |
|-------------------------------|---|------------------------------------|------------------------------|
| Part 4                        | Pressure Drop (basis: Regulation 2-1-403)                               | Y                                  |                              |
| Part 5                        | Minimum Temperature (basis: Regulation 2-1-403)                         | Y                                  |                              |
| Part 6                        | Temperature Monitoring Device (basis: Regulation 1-521)                 | Y                                  |                              |
| Part 7                        | Source Test (basis: Regulation 2-1-403)                                 | Y                                  |                              |
| Part 8                        | Lowering Minimum Temperature (basis: Regulation 2-1-403)                | Y                                  |                              |
| Part 9                        | Allowable Temperature Excursions (basis: Regulation 2-1-403)            | Y                                  |                              |
| Part 10                       | Records of Allowable Temperature Excursions (basis: Regulation 2-1-403) | Y                                  |                              |
| Part 11                       | Temperature Recordkeeping (basis: Regulation 8-12-501.3)                | Y                                  |                              |

**Table IV – L**  
**Source-specific Applicable Requirements**  
**S100– FACILITY WIPE CLEANING PERMIT**

| <b>Applicable Requirement</b>       | <b>Regulation Title or Description of Requirement</b>  | <b>Federally Enforceable (Y<sup>1</sup>/N)</b> | <b>Future Effective Date</b> |
|-------------------------------------|--|--|------------------------------|
| <b>BAAQMD Regulation 8, Rule 1</b>  | <b>Organic Compounds – General Requirements (06/15/94)</b>   |  |                              |
| 8-1-320                             | Surface Preparation; Cleanup; Coating, Ink, Paint Removal  | Y  |                              |
| 8-1-321                             | Closed Containers  | Y  |                              |
| <b>BAAQMD Regulation 8, Rule 16</b> | <b>Organic Compounds - Solvent Cleaning Operations (08/16/98)</b>  |  |                              |
| 8-16-501                            | Solvent Records  | N  |                              |
| <b>SIP Regulation 8, Rule 16</b>    | <b>PROVISIONS NO LONGER IN CURRENT RULE</b><br><b>Organic Compounds - Solvent Cleaning Operations (12/09/94)</b> |  |                              |
| 8-16-501                            | Solvent Records  | Y <sup>1</sup>                                 |                              |

#### IV. Source-Specific Applicable Requirements

**Table IV – L**  
**Source-specific Applicable Requirements**  
**S100– FACILITY WIPE CLEANING PERMIT**

| <b>Applicable Requirement</b>   | <b>Regulation Title or Description of Requirement</b> | <b>Federally Enforceable (Y<sup>1</sup>/N)</b> | <b>Future Effective Date</b> |
|---------------------------------|---|--|------------------------------|
| 8-16-501.1                      | Trichloroethylene                                     | Y <sup>1</sup>                                 |                              |
| 8-16-501.2                      | All Other Solvents                                    | Y <sup>1</sup>                                 |                              |
| <b>BAAQMD Condition # 15371</b> |   |  |                              |
| Part 2                          | Usage (basis: Cumulative Increase)                    | Y  |                              |
| Part 3                          | Records (basis: Cumulative Increase)                  | Y  |                              |

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<sup>1</sup> This section has been removed from BAAQMD Regulations because it has been superseded. Nevertheless, the source must comply with this regulation until US EPA has reviewed and approved (or disapproved) the District's revision of the regulation.

#### IV. Source-Specific Applicable Requirements

**Table IV - M**  
**Source-specific Applicable Requirements**  
**S200 – JOOR 10,000 GALLON STORAGE TANK**  
**S201 – JOOR 10,000 GALLON STORAGE TANK**  
**S202 – JOOR 10,000 GALLON STORAGE TANK**  
**S203 – JOOR 10,000 GALLON STORAGE TANK**  
**S204 – JOOR 10,000 GALLON STORAGE TANK**

| <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 8, Rule 5</b> | Storage of Organic Liquids                            |                                    |                              |
| 8-5-301                            | Storage Tanks Smaller than 150 m <sup>3</sup>         | Y                                  |                              |
| 8-5-501                            | Records   | Y                                  |                              |
| <b>BAAQMD Condition # 15247</b>    |   |                                    |                              |
| Part 1                             | Usage (basis: Cumulative Increase)                    | Y                                  |                              |
| Part 2                             | Usage (basis: Cumulative Increase)                    | Y                                  |                              |
| Part 3                             | Records (basis: Cumulative Increase)                  | 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.

## VI. PERMIT CONDITIONS

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

The following conditions will be amended to include references to S3, S5, S21, and S23, which are also abated by A-25, and to add monitoring requirements: [underlined text indicate additions]

### CONDITION # 1132

FOR S2, LINE # 1 SUB-COATER

S3, LINE # 1 SUB-COAT DRYER

S4, LINE # 1 – TOP COATER

S5, LINE # 1 TOP COAT DRYER

S20, LINE # 3 SUB-COATER

S21, LINE # 3 SUB-COAT DRYER

S22, TOP ROLLER COATER, LINE # 3

S23, TOP DRYER, COATING OVEN, LINE # 3

S56, CENTRIFUGE DECANTER, AND

S82, PILOT LINE ROLLER COATER/ELECTRIC DRYER:

1. S3, S5, S21, S23, S56 and S82 shall not be used unless emissions of Precursor Organic Compounds are vented to Reeco Thermal ~~Incinerator~~ Oxidizer, A25, which is in full operation and achieving a ~~control~~ destruction efficiency of at least 95%, by ~~volume~~ weight, for Precursor Organic Compounds. (basis: BACT; Cumulative Increase)
2. SKC shall not process more than 250,000 gallons of coating per calendar year through S56 and S82 combined. (basis: Cumulative Increase)
3. SKC shall keep a District approved log of the coating processed at S56 and S82. These records shall be retained for a period of ~~two~~ five years and be made available at all times for review by the BAAQMD staff. (basis: BACT; Cumulative Increase)

## VI. Permit Conditions

### CONDITION # 1132

#### FOR S2, LINE # 1 SUB-COATER

S3, LINE # 1 SUB-COAT DRYER

S4, LINE # 1 – TOP COATER

S5, LINE # 1 TOP COAT DRYER

S20, LINE # 3 SUB-COATER

S21, LINE # 3 SUB-COAT DRYER

S22, TOP ROLLER COATER, LINE # 3

S23, TOP DRYER, COATING OVEN, LINE # 3

S56, CENTRIFUGE DECANIER, AND

S82, PILOT LINE ROLLER COATER/ELECTRIC DRYER:

4. In order to demonstrate adequate VOC capture at the S3, S5, S21, S23, S56 and S82, within three (3) months of issuance of the Title V permit, a manahelic gauge or other approved device shall be installed and maintained downstream of each affected exhaust duct to indicate negative pressure at the duct. A minimum vacuum pressure of 0.2 inches of water column (as indicated by the monitoring devices) shall be maintained throughout the system. The pressure drop shall be recorded on a daily basis. This pressure drop log shall be made available for District inspection upon request and shall be retained for a period of five years. (basis: Regulation 2-1-403)
5. The minimum temperature of A25 shall be at least 1400 degrees Fahrenheit (F) whenever S-3, S-5, S-21, S-23, S56 and S82 are in operation. This minimum temperature may be adjusted by the District if source test data demonstrate that an alternate temperature is necessary for or capable of maintaining compliance with part 1 above. (basis: Regulation 2-1-403)
6. The A25 Reeco Thermal Oxidizer shall be equipped with a temperature-measuring device capable of continuously measuring and recording the temperature in A25 Reeco Thermal Oxidizer. This device shall be accurate to within 5 degrees F and shall be maintained in accordance with manufacturer's recommendations. This temperature monitor shall be used to determine compliance with the temperature requirements in part 5. In addition, the temperature log of A25 shall be made available for District inspection upon request and shall be retained for a period of 5 years from the date of each record. (basis: Regulation 1-521)

## VI. Permit Conditions

### CONDITION # 1132

FOR S2, LINE # 1 SUB-COATER

S3, LINE # 1 SUB-COAT DRYER

S4, LINE # 1 – TOP COATER

S5, LINE # 1 TOP COAT DRYER

S20, LINE # 3 SUB-COATER

S21, LINE # 3 SUB-COAT DRYER

S22, TOP ROLLER COATER, LINE # 3

S23, TOP DRYER, COATING OVEN, LINE # 3

S56, CENTRIFUGE DECANTER, AND

S82, PILOT LINE ROLLER COATER/ELECTRIC DRYER:

7. In order to demonstrate compliance with part 1 above, the permit holder shall perform a District approved source test annually, in accordance with the District's Manual of Procedures. The permit holder shall notify the Manager of the District's Source Test Section at least seven (7) days prior to the test, to provide the District staff the option of observing the testing. Within 45 days of test completion, a comprehensive report of the test results shall be submitted to the Manager of the District's Source Test Section for review and disposition. (basis: Regulation 2-1-403)
8. The facility may conduct a source test for the purpose of lowering the minimum temperature requirement provided that the following has occurred:
  - a. The facility has applied to the Permit Services Division for a change of conditions.
  - b. The Source Test Section was notified at least seven days prior to testing and the test protocol was deemed acceptable.
  - c. The results of the test demonstrate that A25 Reeco Thermal Oxidizer is capable of meeting the emission factor limits imposed in part 1 for Precursor Organic Compounds at the lower operating temperature.
  - d. The temperature limit shall be changed in this permit as an administrative permit amendment. (basis: Regulation 2-1-403)
9. The minimum temperature requirement of part 5 shall not apply during an "Allowable Temperature Excursion" below the minimum temperature, provided that the controller set temperature is at or above the minimum temperature requirement. An Allowable Temperature Excursion is one of the following:
  - a. A temperature excursion not exceeding 20 degrees F; or
  - b. A temperature excursion for a period or periods aggregating less than or equal to 15 minutes in any hour; or

## VI. Permit Conditions

### CONDITION # 1132

#### FOR S2, LINE # 1 SUB-COATER

S3, LINE # 1 SUB-COAT DRYER

S4, LINE # 1 – TOP COATER

S5, LINE # 1 TOP COAT DRYER

S20, LINE # 3 SUB-COATER

S21, LINE # 3 SUB-COAT DRYER

S22, TOP ROLLER COATER, LINE # 3

S23, TOP DRYER, COATING OVEN, LINE #3

S56, CENTRIFUGE DECANIER, AND

S82, PILOT LINE ROLLER COATER/ELECTRIC DRYER:

- c. A temperature excursion for a period or periods aggregating more than 15 minutes in any hour, provided that both of the following criteria are met. Only twelve such excursions are allowed per calendar year.
  - i. the excursion does not exceed 50 degrees F; and
  - ii. the duration of the excursion does not exceed 24 hours.

Two or more excursions greater than 15 minutes in duration occurring during the same 24-hour period shall be counted as one excursion toward the 12-excursion limit. (basis: Regulation 2-1-403)

- 10. For each Allowable Temperature Excursion that exceeds 20 degrees F and 15 minutes in duration, the Permit Holder shall keep sufficient records to demonstrate that they meet the qualifying criteria described above. Records shall be retained for a minimum of five years from the date of entry, and shall be made available to the District upon request. Records shall include at least the following information:
  - a. Thermal oxidizer controller set temperature;
  - b. Starting date and time, and duration of each Allowable Temperature Excursion;
  - c. Minimum temperature during each Allowable Temperature Excursion;
  - d. Number of Allowable Temperature Excursions per month, and total number for the current calendar year; and
  - e. All strip charts or other temperature records.  
(basis: Regulation 2-1-403)
- 11. The temperature log of A25 shall be made available for District inspection upon request and shall be retained for a period of 5 years from the date of each record. (basis: Regulation 8-

## VI. Permit Conditions

12-501.3)

### **CONDITION # 15371**

**FOR S70, MIXING KETTLE T-100, 225 GALLON CAPACITY  
S71, HOLD TANK, T-200, 225 GALLON CAPACITY,  
S72, FEED TANK, MEZZANINE LEVEL, 225 GALLON CAPACITY, AND  
S100, FACILITY WIPE CLEANING PERMIT:**

1. The total combined throughput of product manufactured at S70, S71, and S72, mixing kettles, shall not exceed 170,010 gallons during any consecutive twelve-month period. (basis: cumulative increase)
2. The total clean-up solvent used at S70, S71, S72 mixing kettles and S100 wipe cleaning shall not exceed 3,500 gallons during any consecutive twelve-month period. (basis: Cumulative Increase)
3. In order to demonstrate compliance with the above ~~condition parts~~ parts, the following records shall be maintained in a District-approved log. These records shall be kept on site and made available for inspection for a period of at least ~~24 months~~ five years from the date on which a record is made.
  - a. The type and amount of product produced at S70, S71, and S72, in gallons per month.
  - b. The type and amount of clean-up solvent used at S70, S71, S72 and S100, in gallons per month.
  - c. The monthly quantities shall be totaled on a ~~quarterly~~ consecutive twelve-month basis. (basis: ~~record-keeping~~ Cumulative Increase)

### **CONDITION # 7612**

**FOR S73, SUB MIX TANK, LINE # 1, 225 GALLON CAPACITY, AND  
S74, SUB MIX TANK, LINE # 3, 225 GALLON CAPACITY**

1. The total combined throughput of product manufactured at S73 and S74 shall not exceed 111,000 gallons during any consecutive twelve-month period. (basis: Cumulative Increase)

## VI. Permit Conditions

### CONDITION # 7612

**FOR S73, SUB MIX TANK, LINE # 1, 225 GALLON CAPACITY, AND  
S74, SUB MIX TANK, LINE # 3, 225 GALLON CAPACITY**

2. In order to demonstrate compliance with the above ~~condition part~~, the following records shall be maintained in a District-approved log. These records shall be kept on site and made available for inspection for a period of ~~24 months~~ five years from the date on which a record is made. (basis: Cumulative Increase)
  - a. The type and amount of product produced at S73 and S74 in gallons per month.
  - b. The monthly quantities shall be totaled on a ~~quarterly~~ consecutive twelve-month basis.

### CONDITION # 12974

**FOR S77, FLEXOGRAPHIC STRIPER FOR 105MM DUPLICATE MICROFILM  
S78, Flexographic STRIPER FOR 105MM DUPLICATE MICROFILM  
S79, FLEXOGRAPHIC STRIPER FOR 105MM DUPLICATE MICROFILM, AND  
S80, 59" FLEXOGRAPHIC STRIPER FOR MICROFILM  
S81, CUSTOM COLD SOLVENT SINK – STRIPING OPERATION**

1. During all periods of operation, organic compound emissions from S77, S78, S79, and S80, shall be vented to A24, Thermal Oxidizer. (basis: BACT; Cumulative Increase)
2. The precursor organic compound destruction efficiency of A24, Thermal Oxidizer, shall be maintained at a minimum of 98.5% by weight and the overall capture/destruction efficiency of A24 shall be maintained at a minimum of 75% by weight overall. (basis: BACT; Cumulative Increase)
3. A24 Thermal Oxidizer, shall be properly maintained and kept in good operating condition at all times. In no event shall the minimum operating temperature of the Thermal Oxidizer be less than 1450 degrees F, whenever S77, S78, S79, or S80 is in operation. (basis: Regulation 2-1-403)

## VI. Permit Conditions

### CONDITION # 12974

**FOR S77, FLEXOGRAPHIC STRIPER FOR 105MM DUPLICATE MICROFILM  
S78, Flexographic STRIPER FOR 105MM DUPLICATE MICROFILM  
S79, FLEXOGRAPHIC STRIPER FOR 105MM DUPLICATE MICROFILM, AND  
S80, 59" FLEXOGRAPHIC STRIPER FOR MICROFILM  
S81, CUSTOM COLD SOLVENT SINK – STRIPING OPERATION**

4. In order to determine compliance with ~~Condition~~ part 3, A 24, Thermal Oxidizer, shall be equipped with continuous temperature measuring instrumentation consisting of at least 1 thermocouple temperature probe in the thermal oxidizer. The temperature log of A24 shall be made available to the District upon request and kept for a period of five years. (basis: Regulation 1-521)
5. The total amount of inks, including make-up solvent, applied at sources S77, S78, S79, and S80 shall not exceed 6,510 gallons during any consecutive twelve-month period. (basis: Cumulative Increase)
6. The net usage of clean-up solvents used at sources S 77, S78, S79, and S80 shall not exceed 682 gallons during any consecutive twelve-month period. (basis: Cumulative Increase)
7. The net usage of clean-up solvents used at source S81 shall not exceed 200 gallons during any consecutive twelve-month period. (basis: Cumulative Increase)
8. The operator of this source shall maintain the following records for each day of operation of the source in a District approved log: (basis: Cumulative Increase)
  - a. the dates of operation
  - b. each emission test or analysis result logged in for the day of operation they were taken.
  - c. the type, VOC content, and amount of material used daily (separate totals for each material or group of materials consistent with previous ~~condition~~ parts).
  - d. the daily quantities shall be totaled on a monthly and consecutive twelve month basis. These records shall be retained for at least ~~two~~ five years from the date of entry and shall be made available for District inspection upon request.

## VI. Permit Conditions

### CONDITION # 12974

**FOR S77, FLEXOGRAPHIC STRIPER FOR 105MM DUPLICATE MICROFILM  
S78, Flexographic STRIPER FOR 105MM DUPLICATE MICROFILM  
S79, FLEXOGRAPHIC STRIPER FOR 105MM DUPLICATE MICROFILM, AND  
S80, 59" FLEXOGRAPHIC STRIPER FOR MICROFILM  
S81, CUSTOM COLD SOLVENT SINK – STRIPING OPERATION**

9. In order to demonstrate adequate VOC capture at the S77, S78, S79 and S80, within three (3) months of issuance of the Title V permit, a magnahelic gauge or other approved device shall be installed and maintained downstream of each affected exhaust duct to indicate negative pressure at the duct. A minimum vacuum pressure of 0.2 inches of water column (as indicated by the monitoring devices) shall be maintained throughout the system. The pressure drop shall be recorded on a daily basis. This pressure drop log shall be made available for District inspection upon request and shall be retained for a period of five years. (basis: Regulation 2-1-403)
  
10. In order to demonstrate compliance with part 2 above, the permit holder shall perform a District approved source test annually, in accordance with the District's Manual of Procedures. The permit holder shall notify the Manager of the District's Source Test Section at least seven (7) days prior to the test, to provide the District staff the option of observing the testing. Within 45 days of test completion, a comprehensive report of the test results shall be submitted to the Manager of the District's Source Test Section for review and disposition. (basis: Regulation 2-1-403)
  
11. The facility may conduct a source test for the purpose of lowering the minimum temperature requirement provided that the following has occurred:
  - a. The facility has applied to the Permit Services Division for a change of conditions.
  - b. The Source Test Section was notified at least seven days prior to testing and the test protocol was deemed acceptable.
  - c. The results of the test demonstrate that A24 Thermal Oxidizer is capable of meeting the emission factor limits imposed in part 2 for Precursor Organic Compounds at the lower operating temperature.
  - d. The temperature limit shall be changed in this permit as an administrative permit amendment. (basis: Regulation 2-1-403)

## VI. Permit Conditions

### CONDITION # 12974

**FOR S77, FLEXOGRAPHIC STRIPER FOR 105MM DUPLICATE MICROFILM  
S78, Flexographic STRIPER FOR 105MM DUPLICATE MICROFILM  
S79, FLEXOGRAPHIC STRIPER FOR 105MM DUPLICATE MICROFILM, AND  
S80, 59" FLEXOGRAPHIC STRIPER FOR MICROFILM  
S81, CUSTOM COLD SOLVENT SINK – STRIPING OPERATION**

12. The minimum temperature requirement of part 3 shall not apply during an “Allowable Temperature Excursion” below the minimum temperature, provided that the controller set temperature is at or above the minimum temperature requirement. An Allowable Temperature Excursion is one of the following:

- a. A temperature excursion not exceeding 20 degrees F; or
- b. A temperature excursion for a period or periods aggregating less than or equal to 15 minutes in any hour; or
- c. A temperature excursion for a period or periods aggregating more than 15 minutes in any hour, provided that both of the following criteria are met. Only twelve such excursions are allowed per calendar year.
  - i. the excursion does not exceed 50 degrees F; and
  - ii. the duration of the excursion does not exceed 24 hours.

Two or more excursions greater than 15 minutes in duration occurring during the same 24-hour period shall be counted as one excursion toward the 12-excursion limit. (basis: Regulation 2-1-403)

13. For each Allowable Temperature Excursion that exceeds 20 degrees F and 15 minutes in duration, the Permit Holder shall keep sufficient records to demonstrate that they meet the qualifying criteria described above. Records shall be retained for a minimum of five years from the date of entry, and shall be made available to the District upon request. Records shall include at least the following information:

- a. Thermal oxidizer controller set temperature;
  - b. Starting date and time, and duration of each Allowable Temperature Excursion;
  - c. Minimum temperature during each Allowable Temperature Excursion;
  - d. Number of Allowable Temperature Excursions per month, and total number for the current calendar year; and
  - e. All strip charts or other temperature records.
- (basis: Regulation 2-1-403)

## VI. Permit Conditions

### CONDITION # 12974

**FOR S77, FLEXOGRAPHIC STRIPER FOR 105MM DUPLICATE MICROFILM  
S78, Flexographic STRIPER FOR 105MM DUPLICATE MICROFILM  
S79, FLEXOGRAPHIC STRIPER FOR 105MM DUPLICATE MICROFILM, AND  
S80, 59" FLEXOGRAPHIC STRIPER FOR MICROFILM  
S81, CUSTOM COLD SOLVENT SINK – STRIPING OPERATION**

14. The temperature log of A24 shall be made available for District inspection upon request and shall be retained for a period of 5 years from the date of each record. (basis: Regulation 8-12-501.3)

### CONDITION # 15247

**FOR S200, JOOR 10,000 GALLON STORAGE TANK  
S201, JOOR 10,000 GALLON STORAGE TANK  
S202, JOOR 10,000 GALLON STORAGE TANK  
S203, JOOR 10,000 GALLON STORAGE TANK, AND  
S204, JOOR 10,000 GALLON STORAGE TANK**

1. Only the following materials shall be stored in S200, S201, S202, S203, and S204: Acetone, MEK, Propylene Glycol Methyl Ether, Ethanol, MIBK, ~~Methanol MeOH~~, Isopropyl Alcohol. (basis: Cumulative Increase)
2. The combined throughput of sources S200, S201, S202, S203, and S204 shall not exceed 1,000,000 gallons in any consecutive 12-month period. (basis: Cumulative Increase)
3. Owner/operator shall record, in a District-approved log, the throughput of each of the sources S200, S201, S202, S203, and S204, summarized on a monthly basis. This log shall remain on site for at least 2 5 years from the date the record was made. Monthly records shall be totaled on a consecutive twelve-month basis. (basis: Cumulative Increase)

## VI. Permit Conditions

The following conditions will be added to S1 Polymer Vessel to ensure that emissions are negligible (< 10 lb/day):

### **CONDITION # 17003 FOR S1, POLYMER VESSEL**

1. There shall be no venting of the Polymer Vessel (S-1) directly to atmosphere during normal operating conditions. (basis: 2-1-403)
2. The Polymer Vessel (S-1) shall be inspected weekly for damaged or missing seals or gaskets. Any damaged or missing seals or gaskets shall be replaced within 48 hours of discovery. The results of such weekly inspections and any repair or replacement action shall be recorded in a District-approved log and made available for District inspection. This inspection log shall remain on site for at least 5 years from the date the record was made. (basis: 2-1-403)

## 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 indicates whether periodic (P) or continuous (C) monitoring is required. For periodic monitoring, the frequency of the monitoring has also been shown, either annual (A), quarterly (Q), monthly (M), weekly (W), 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**  
**S1 - POLYMER VESSEL**

| Type of Limit | Emission Limit Citation | FE Y/N | Future Effective Date | Emission Limit       | Monitoring Requirement Citation | Monitoring Frequency (P/C/N) | Monitoring Type   |
|---------------|-------------------------|--------|-----------------------|----------------------|---------------------------------|------------------------------|-------------------|
| POC           | BAAQMD 8-36-301.2       | Y      |                       | POC $\leq$ 10 lb/day | BAAQMD Condition # 17003 Part 2 | P/W                          | Visual Inspection |

## VII. Applicable Limits and Compliance Monitoring Requirements

**Table VII - B**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S2 – LINE # 1 SUB-COATER**  
**S3 – LINE # 1 SUB-COAT DRYER**  
**S4– LINE # 1 – TOP COATER**  
**S5– LINE # 1 TOP COAT DRYER**  
**S20 – LINE # 3 SUB-COATER**  
**S21 – LINE # 3 SUB-COAT DRYER**  
**S22 – TOP ROLLER COATER, LINE # 3**  
**S23– TOP DRYER, COATING OVEN, LINE # 3**

| Type of Limit | Emission Limit Citation                 | FE Y/N | Future Effective Date | Emission Limit                  | Monitoring Requirement Citation                               | Monitoring Frequency (P/C/N) | Monitoring Type |
|---------------|---|--------|-----------------------|---------------------------------|---|------------------------------|-----------------|
| POC           | BAAQMD<br>8-12-301.2                    | Y      |                       | VOC < 1.0 lb/gal                | BAAQMD<br>8-12-501<br>BAAQMD<br>Condition #<br>1132<br>Part 4 | P/D                          | Pressure Drop   |
|               | BAAQMD<br>8-12-301.2                    | Y      |                       | VOC < 1.0 lb/gal                | BAAQMD<br>8-12-501<br>BAAQMD<br>Condition #<br>1132<br>Part 6 | P/C                          | Temperature     |
|               | BAAQMD<br>8-12-301.2                    | Y      |                       | VOC < 1.0 lb/gal                | BAAQMD<br>Condition #<br>1132<br>Part 7                       | P/A                          | Source Test     |
|               | BAAQMD<br>Condition #<br>1132<br>Part 5 | Y      |                       | Temperature ≥ 1400<br>degrees F | BAAQMD<br>Condition #<br>1132<br>Part 6                       | P/C                          | Temperature     |

## VII. Applicable Limits and Compliance Monitoring Requirements

**Table VII – C**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S56 – CENTRIFUGE DECANTER**

| Type of Limit | Emission Limit Citation                           | FE Y/N | Future Effective Date | Emission Limit                                   | Monitoring Requirement Citation | Monitoring Frequency (P/C/N) | Monitoring Type |
|---------------|---|--------|-----------------------|--|---------------------------------|------------------------------|-----------------|
| POC           | BAAQMD 8-36-301.1; BAAQMD Condition # 1132 Part 4 | Y      |                       | Destruction Abatement Efficiency $\geq 95$ % wt. | BAAQMD Condition # 1132 Part 4  | P/D                          | Pressure Drop   |
|               | BAAQMD 8-36-301.1; BAAQMD Condition # 1132 Part 5 | Y      |                       | Destruction Abatement Efficiency $\geq 95$ % wt. | BAAQMD Condition # 1132 Part 6  | P/C                          | Temperature     |
|               | BAAQMD 8-36-301.1; BAAQMD Condition # 1132 Part 1 | Y      |                       | Destruction Abatement Efficiency $\geq 95$ % wt. | BAAQMD Condition # 1132 Part 7  | P/A                          | Source Test     |
|               | BAAQMD Condition # 1132 Part 2                    | Y      |                       | Coating $\leq 250,000$ gal/yr                    | BAAQMD Condition # 1132 Part 3  | P/M                          | Records         |
|               | BAAQMD Condition # 1132 Part 5                    | Y      |                       | Temperature $\geq 1400$ degrees F                | BAAQMD Condition # 1132 Part 6  | P/C                          | Temperature     |

## VII. Applicable Limits and Compliance Monitoring Requirements

**Table VII - D**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S70 –MIXING KETTLE T-100, 225 GALLON CAPACITY**  
**S71 – HOLD TANK, T-200, 225 GALLON CAPACITY**  
**S72–FEED TANK, MEZZANINE LEVEL, 225 GALLON CAPACITY**

| Type of Limit | Emission Limit Citation         | FE Y/N | Future Effective Date | Emission Limit   | Monitoring Requirement Citation | Monitoring Frequency (P/C/N) | Monitoring Type |
|---------------|---------------------------------|--------|-----------------------|--|---------------------------------|------------------------------|-----------------|
| POC           | BAAQMD Condition # 15371 Part 1 | Y      |                       | Total combined throughput of product $\leq$ 170,010 gal/yr | BAAQMD Condition # 15371 Part 3 | P/M                          | Records         |
|               | BAAQMD Condition # 15371 Part 2 | Y      |                       | Clean-up solvent $\leq$ 3,500 gal/yr                       | BAAQMD Condition # 15371 Part 3 | P/M                          | Records         |

**Table VII – E**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S73 –SUB-MIX TANK, LINE # 1, 225 GALLON CAPACITY**  
**S74 – SUB-MIX TANK, LINE # 3, 225 GALLON CAPACITY**

| Type of Limit | Emission Limit Citation        | FE Y/N | Future Effective Date | Emission Limit   | Monitoring Requirement Citation | Monitoring Frequency (P/C/N) | Monitoring Type |
|---------------|--------------------------------|--------|-----------------------|--|---------------------------------|------------------------------|-----------------|
| POC           | BAAQMD Condition # 7612 Part 1 | Y      |                       | Total combined throughput of product $\leq$ 111,000 gal/yr | BAAQMD Condition # 7612 Part 2  | P/M                          | Records         |

## VII. Applicable Limits and Compliance Monitoring Requirements

**Table VII – F**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S77 – FLEXOGRAPHIC STRIPER FOR 105MM DUPLICATE MICROFILM**  
**S78 – FLEXOGRAPHIC STRIPER FOR 105MM DUPLICATE MICROFILM**  
**S79 – FLEXOGRAPHIC STRIPER FOR 105MM DUPLICATE MICROFILM**  
**S80 – 59” FLEXOGRAPHIC STRIPER FOR MICROFILM**

| Type of Limit | Emission Limit Citation         | FE Y/N | Future Effective Date | Emission Limit   | Monitoring Requirement Citation  | Monitoring Frequency (P/C/N) | Monitoring Type |
|---------------|---------------------------------|--------|-----------------------|--|----------------------------------|------------------------------|-----------------|
| POC           | BAAQMD 8-20-308                 | Y      |                       | Overall Capture/Destruction Efficiency $\geq 75$ % wt.   | BAAQMD Condition 12974 Part 9    | P/D                          | Pressure Drop   |
|               | BAAQMD 8-20-308                 | Y      |                       | Overall Capture/Destruction Efficiency $\geq 75$ % wt.   | BAAQMD 8-20-505                  | P/C                          | Temperature     |
|               | BAAQMD Condition # 12974 Part 2 | Y      |                       | Destruction Efficiency $\geq 98.5$ % wt., and Overall Capture/Destruction Efficiency $\geq 75$ % wt. | BAAQMD Condition # 12974 Part 4  | P/C                          | Temperature     |
|               | BAAQMD Condition # 12974 Part 2 | Y      |                       | Destruction Efficiency $\geq 98.5$ % wt., and Overall Capture/Destruction Efficiency $\geq 75$ % wt. | BAAQMD Condition # 12974 Part 9  | P/D                          | Pressure Drop   |
|               | BAAQMD Condition # 12974 Part 2 | Y      |                       | Destruction Efficiency $\geq 98.5$ % wt., and Overall Capture/Destruction Efficiency $\geq 75$ % wt. | BAAQMD Condition # 12974 Part 10 | P/A                          | Source Test     |
|               | BAAQMD Condition # 12974 Part 3 | Y      |                       | Temperature $\geq 1450$ degrees F  | BAAQMD Condition # 12974 Part 4  | P/C                          | Temperature     |
|               | BAAQMD Condition # 12974 Part 5 | Y      |                       | Inks including make-up solvent $\leq 6,510$ gal/yr   | BAAQMD Condition # 12974 Part 8  | P/M                          | Records         |

## VII. Applicable Limits and Compliance Monitoring Requirements

**Table VII – F**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S77 – FLEXOGRAPHIC STRIPER FOR 105MM DUPLICATE MICROFILM**  
**S78 – FLEXOGRAPHIC STRIPER FOR 105MM DUPLICATE MICROFILM**  
**S79 – FLEXOGRAPHIC STRIPER FOR 105MM DUPLICATE MICROFILM**  
**S80 – 59” FLEXOGRAPHIC STRIPER FOR MICROFILM**

| Type of Limit | Emission Limit Citation         | FE Y/N | Future Effective Date | Emission Limit                     | Monitoring Requirement Citation | Monitoring Frequency (P/C/N) | Monitoring Type |
|---------------|---------------------------------|--------|-----------------------|------------------------------------|---------------------------------|------------------------------|-----------------|
|               | BAAQMD Condition # 12974 Part 6 | Y      |                       | Clean-up solvent $\leq$ 682 gal/yr | BAAQMD Condition # 12974 Part 8 | P/M                          | Records         |

**Table VII – G**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S81 – CUSTOM COLD SOLVENT SINK - STRIPING OPERATION**

| Type of Limit | Emission Limit Citation         | FE Y/N | Future Effective Date | Emission Limit                     | Monitoring Requirement Citation | Monitoring Frequency (P/C/N) | Monitoring Type |
|---------------|---------------------------------|--------|-----------------------|------------------------------------|---------------------------------|------------------------------|-----------------|
| POC           | BAAQMD Condition # 12974 Part 7 | Y      |                       | Clean-up solvent $\leq$ 200 gal/yr | BAAQMD Condition # 12974 Part 8 | P/M                          | Records         |

## VII. Applicable Limits and Compliance Monitoring Requirements

**Table VII – H**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S82 – PILOT LINE ROLLER COATER/ELECTRIC DRYER**

| Type of Limit | Emission Limit Citation        | FE Y/N | Future Effective Date | Emission Limit                                   | Monitoring Requirement Citation | Monitoring Frequency (P/C/N) | Monitoring Type |
|---------------|--------------------------------|--------|-----------------------|--|---------------------------------|------------------------------|-----------------|
| POC           | BAAQMD 8-12-301.2              | Y      |                       | VOC $\leq$ 1.0 lb/gal                            | BAAQMD Condition # 1132 Part 4  | P/D                          | Pressure Drop   |
|               | BAAQMD 8-12-301.2              | Y      |                       | VOC $\leq$ 1.0 lb/gal                            | BAAQMD 8-12-501.3               | P/C                          | Temperature     |
|               | BAAQMD Condition # 1132 Part 1 | Y      |                       | Destruction Abatement Efficiency $\geq$ 95 % wt. | BAAQMD Condition # 1132 Part 7  | P/A                          | Source Test     |
|               | BAAQMD Condition # 1132 Part 5 | Y      |                       | Temperature $\geq$ 1400 degrees F                | BAAQMD Condition # 1132 Part 6  | P/C                          | Temperature     |
|               | BAAQMD Condition # 1132 Part 2 | Y      |                       | Coating $\leq$ 250,000 gal/yr                    | BAAQMD Condition # 1132 Part 3  | P/M                          | Records         |

## VII. Applicable Limits and Compliance Monitoring Requirements

**Table VII – I**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S100 – FACILITY WIPE CLEANING PERMIT**

| Type of Limit | Emission Limit Citation         | FE Y/N | Future Effective Date | Emission Limit   | Monitoring Requirement Citation | Monitoring Frequency (P/C/N) | Monitoring Type |
|---------------|---------------------------------|--------|-----------------------|--|---------------------------------|------------------------------|-----------------|
|               | BAAQMD Condition # 15371 Part 2 | Y      |                       | Clean-up solvent of S70, S71, S72, and S100 ≤ 3,500 gal/yr | BAAQMD Condition # 15371 Part 3 | P/M                          | Records         |

**Table VII – J**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S200 – JOOR 10,000 GALLON STORAGE TANK**  
**S201 – JOOR 10,000 GALLON STORAGE TANK**  
**S202 – JOOR 10,000 GALLON STORAGE TANK**  
**S203 – JOOR 10,000 GALLON STORAGE TANK**  
**S204 – JOOR 10,000 GALLON STORAGE TANK**

| Type of Limit | Emission Limit Citation         | FE Y/N | Future Effective Date | Emission Limit                                       | Monitoring Requirement Citation | Monitoring Frequency (P/C/N) | Monitoring Type |
|---------------|---------------------------------|--------|-----------------------|--|---------------------------------|------------------------------|-----------------|
| POC           | BAAQMD Condition # 15247 Part 2 | Y      |                       | Total combined liquids throughput ≤ 1,000,000 gal/yr | BAAQMD Condition # 15247 Part 3 | P/M                          | Records         |

## VIII. TEST METHODS

The test methods associated with the emission limit of a District regulation are generally referenced in Section 600 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 Regulation 8-12-301.2  | Limitations, Coating Lines                            | Manual of Procedures, Volume IV, ST-7, Non-Methane Organic Carbon Sampling, or EPA Method 25, Gaseous Non-Methane Organic Emissions or 25A, Gaseous Organic Concentration (Flame Ionization) |
| BAAQMD Regulation 8-20-308    | Limitations, Coating Lines                            | Manual of Procedures, Volume IV, ST-7, Non-Methane Organic Carbon Sampling, or EPA Method 25, Gaseous Non-Methane Organic Emissions or 25A, Gaseous Organic Concentration (Flame Ionization) |
| BAAQMD Regulation 8-22-301    | Valves and Flanges                                    | Combustible Gas Indicator Approved by APCO in accordance with EPA Method 21  |
| BAAQMD Regulation 8-35-301.6  | Portable and Stationary Mixing Operating Requirements | Manual of Procedures, Volume IV, ST-7, Non-Methane Organic Carbon Sampling, or EPA Method 25, Gaseous Non-Methane Organic Emissions or 25A, Gaseous Organic Concentration (Flame Ionization) |
| BAAQMD Regulation 8-36-301.2  | Resin Reactors, Thinning Tanks, and Blending Tanks    | Manual of Procedures, Volume IV, ST-7, Non-Methane Organic Carbon Sampling   |

## **IX. PERMIT SHIELD**

**Not applicable.**

## **X. GLOSSARY**

### **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, and District Regulation 2, Rule 5.

### **Major Facility**

A facility with potential emissions of regulated air pollutants greater than or equal to 100 tons per year, greater than or equal to 10 tons per year of any single hazardous air pollutant, and/or greater than or equal to 25 tons per year of any combination of hazardous air pollutants, or such lesser quantity as determined by the EPA administrator.

### **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. Contained 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 both 40 CFR Part 60 and District Regulation 10.

## **X. Glossary**

### **NSR**

New Source Review. A federal program for pre-construction review and permitting of new 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 by virtue of certain other characteristics (defined in Regulation 2, Rule 6) is subject to Titles IV and V of the Clean Air Act.

### **POC**

Precursor Organic Compounds

### **PM**

Total Particulate Matter

### **PM<sub>10</sub>**

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.

### **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.

## **X. Glossary**

### **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.

### **TSP**

Total Suspended Particulate

### **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                             |

## **XI. APPLICABLE STATE IMPLEMENTATION PLAN**

See Attachments