

**YOLO-SOLANO AIR QUALITY MANAGEMENT DISTRICT**

1947 Galileo Court, Suite 103; Davis, CA 95618

**Emission Evaluation and Statement of Basis Addendum**

<b>ENGINEER:</b>	Kyle Rohlfing	ATC #	C-10-123
		SIC Code #	9223
<b>FACILITY NAME:</b>	Prison Industry Authority	UTM E	589.9 km
		UTM N	4241.5 km
<b>LOCATION:</b>	The equipment is located at 2100 Peabody Road, Bldg. 603, in Vacaville. The equipment is not located within 1,000 feet of a K-12 school and is not subject to the requirements of H&S 42301.6.		
<b>PROPOSAL:</b>	The applicant is proposing to modify P-77-92(a) to change the permitted process limits from volume of material usage to amount of VOCs emitted.		
<b>PROCESS:</b>	Letterpress and Silkscreen Printing Operation		
<b>FLOW DIAGRAM:</b>	None required		

**EQUIPMENT:**

<u>Device Type</u>	<u>Equipment</u>	<u>Model No.</u>	<u>Horsepower</u>
Letterpress	Heidelberg	-	3 HP
Letterpress	Brandtjen & Kluge, Inc.	D Series	3 HP
Letterpress	Brandtjen & Kluge, Inc.	D Series	2 HP
Letterpress	Brandtjen & Kluge, Inc.	D Series	2 HP
Screen Printing Press	American M&M	Cameo 18	0.75 HP
Screen Printing Press	American M&M	Cameo 24 DC	0.25 HP
Screen Printing Press	American M&M	Cameo 30 DC	0.5 HP
Screen Printing Press	American M&M	Cameo 38 DC	0.75 HP
Dryer, UV	AWT	XL24 Dryer/4827D	0.33 HP
Dryer, UV	American Screen Printing Equipment	48-300w	0.25 HP
Plate Maker	Pro-Light 2 Vacuum Frame	PLS-84112-2	0.75 HP *
Parts Washer	High Pressure Water System	KO-74	0.75 HP *
<b>Total Proposed Horsepower:</b>			<b>12.8 HP</b>

\* Will not be accounted in the permitted inventory since the equipment does not generate VOC emissions.

**CONTROL EQUIPMENT:** None

**APPLICATION DATA:**

<u>Letterpress Ink</u>	<u>Units</u>	<u>Formula Symbol</u>	<u>Reference</u>
Daily Limit =	22.5 lb of ink	AD	Applicant
Quarterly Limit =	400.0 lb of ink	AQ	Applicant
Yearly Limit =	1,400.0 lb of ink	AY	Applicant
<u>High-VOC Silkscreen Ink</u>	<u>Units</u>	<u>Formula Symbol</u>	<u>Reference</u>
Daily Limit =	0.1 gallons	BD	Applicant
Quarterly Limit =	0.1 gallons	BQ	Applicant
Yearly Limit =	0.5 gallons	BY	Applicant
<u>Med.-VOC Silkscreen Ink</u>	<u>Units</u>	<u>Formula Symbol</u>	<u>Reference</u>
Daily Limit =	0.9 gallons	CD	Applicant
Quarterly Limit =	0.9 gallons	CQ	Applicant
Yearly Limit =	1.4 gallons	CY	Applicant
<u>Low-VOC Silkscreen Ink</u>	<u>Units</u>	<u>Formula Symbol</u>	<u>Reference</u>
Daily Limit =	29.5 gallons	DD	Applicant
Quarterly Limit =	221.0 gallons	DQ	Applicant
Yearly Limit =	848.8 gallons	DY	Applicant
<u>Adhesive</u>	<u>Units</u>	<u>Formula Symbol</u>	<u>Reference</u>
Daily Limit =	1.0 gallons	RD	Applicant

Quarterly Limit =	4.0 gallons	RQ	Applicant
Yearly Limit =	16.0 gallons	RY	Applicant

<u>UV &amp; Non-UV Ink Solvent</u>	<u>Units</u>	<u>Formula Symbol</u>	<u>Reference</u>
Daily Limit =	1.50 gallons	SD	Applicant
Quarterly Limit =	17.0 gallons	SQ	Applicant
Yearly Limit =	60.0 gallons	SY	Applicant

**ASSUMPTIONS:**

<u>Ink Density Data</u>	<u>Units</u>	<u>Formula Symbol</u>	<u>Reference</u>
Letterpress Ink =	11.41 avg. lb/gallon	D1	P-77-92(a)
<u>Misc. Data</u>	<u>Units</u>	<u>Formula Symbol</u>	<u>Reference</u>
Substrate Retention =	95 % Retained	IR	EPA CTG Pg. 9, (9/06) *
Shop Towel Retention =	50 % Retained	SR	EPA CTG Pg. 19, (9/06) *
% of Shop Towel Application =	50 % of All Solvent Used	SP	Applicant **

\* EPA Control Techniques Guidelines for Offset Lithographic Printing and Letterpress Printing (9/06).

\*\* Conservative assumption that half of the solvent used in the operation is not applied with a shop rag.

**EMISSION FACTORS:**

<u>VOC Factors</u>	<u>Units</u>	<u>Formula Symbol</u>	<u>Reference</u>
Letterpress Ink =	2.50 lb/gallon	EF1	Applicant <sup>a</sup> .
High-VOC Silkscreen Ink =	7.00 lb/gallon	EF2	Applicant <sup>a</sup> .
Med-VOC Silkscreen Ink =	4.50 lb/gallon	EF3	Applicant <sup>a</sup> .
Low-VOC Silkscreen Ink =	0.33 lb/gallon	EF4	Applicant <sup>a</sup> .
Adhesive =	5.50 lb/gallon	EFr	Applicant <sup>a</sup> .
Solvent =	1.99 lb/gallon	EFs	Applicant <sup>b</sup> .

a. Since the source is not subject to the requirements of Rule 2.29 - Graphic Arts Printing Operations (see comments below), the applicant had proposed maximum VOC contents for the various categories of ink. With this modification the applicant has decided to change only the maximum VOC content of the low-VOC silkscreen ink from the limits of P-77-92(a). The maximum VOC content of solvents has been decreased due to the lower of limits in the last revision of Rule 2.31 - Surface Preparation and Cleanup.

b. Conservatively, all solvents (surface prep. and cleanup) will be evaluated at the higher VOC limit of 1.99 lb/gallon.

**EMISSION CALCULATIONS:**

**1. Determine VOC Emissions:**

**Letterpress Ink Emissions:**

Max Daily VOC Emissions = $AD / D1 * EF1 * (100\% - IR) =$	0.2 lb/day
Quarterly VOC Emissions = $AQ / D1 * EF1 * (100\% - IR) =$	4 lb/quarter
Max Yearly VOC Emissions = $AY / D1 * EF1 * (100\% - IR) * (1 \text{ ton}/2,000 \text{ lb}) =$	0.01 tons/year

**Silkscreen Ink Emissions:**

Max Daily VOC Emissions = $(BD*EF2) + (CD*EF3) + (DD*EF4) =$	14.7 lb/day
Quarterly VOC Emissions = $(BQ*EF2) + (CQ*EF3) + (DQ*EF4) =$	78 lb/quarter
Yearly VOC Ems. = $[(BY*EF2) + (CY*EF3) + (DY*EF4)] * (1 \text{ ton}/2,000 \text{ lb}) =$	0.15 tons/year

**Adhesive Emissions:**

Max Daily VOC Emissions = $RD * EFr =$	5.5 lb/day
Quarterly VOC Emissions = $RQ * EFr =$	22 lb/quarter
Max Yearly VOC Emissions = $RY * EFr =$	88.0 lb/year
Max Yearly VOC Emissions = $RY * EFr * (1 \text{ ton}/2,000 \text{ lb}) =$	0.04 tons/year

**Solvent Emissions:**

Max Daily VOC Emissions = $SD * EFs * (100\% - SP*SR) =$	2.2 lb/day
Quarterly VOC Emissions = $SQ * EFs * (100\% - SP*SR) =$	25 lb/quarter
Max Yearly VOC Emissions = $SY * EFs * (100\% - SP*SR) * (1 \text{ ton}/2,000 \text{ lb}) =$	0.04 tons/year

**Total VOC Emissions:**

Max Daily VOC Emissions = $SUM [\text{Inks} + \text{Adhesive} + \text{Solvent}] =$	22.7 lb/day
Quarterly VOC Emissions = $SUM [\text{Inks} + \text{Adhesive} + \text{Solvent}] =$	130 lb/quarter
Max Yearly VOC Emissions = $SUM [\text{Inks} + \text{Adhesive} + \text{Solvent}] =$	0.24 tons/year

Max Yearly VOC Emissions = SUM [Inks + Adhesive + Solvent] = 483 lb/year

**RULE & REGULATION COMPLIANCE EVALUATION:**

**District Rule 2.3-Ringelmann**

The version of the rule used in this evaluation is the rule adopted on October 1, 1971, and is part of the California State Implementation Plan (SIP). The source is currently in compliance with the requirements of the rule.

- 1. Requirement:** The Permit Holder shall not discharge into the atmosphere from any single source of emission whatsoever, any air contaminant for a period or periods aggregating more than three (3) minutes in any one (1) hour which is:
- As dark or darker in shade as that designated as No. 2 on the Ringelmann Chart as published by the United States Bureau of Mines; or
  - Of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke described in subsection a. of this condition. [District Rule 2.3]

**Subsuming Demonstration:** The requirements of the rule can be streamlined by a Rule 3.4, New Source Review condition

**Subsuming condition:** The Permit Holder shall not discharge into the atmosphere any air contaminant for a period or periods aggregating more than 3 minutes in any one hour which is:

- As dark or darker in shade than No. 1 on the Ringelmann Chart; or
- Greater than 20% opacity. [District Rule 3.4/C-10-123]

**District Rule 2.5-Nuisance**

The operation is expected to comply with the rule requirement of no discharge which causes injury, detriment, nuisance, or annoyance to any considerable number of persons or the public. A condition will not be placed on the ATC, but will be added to the PTO upon implementation.

**District Rule 2.13-Organic Solvents**

Per Section 110.2, the provisions of this rule do not apply since the solvent cleaning and preparation activities are subject to the provisions of Rule 2.31, Surface Preparation and Cleanup.

**District Rule 2.29-Graphic Arts Printing Operation**

Per Section 110.2, any graphic arts facility which emits less than 400 lb of VOC in any month (including all emissions from solvent preparation and cleanup) is exempt from the requirements of the rule. As calculated above, the total quarterly emissions for the operation are not to exceed 130 pounds. As such, the facility complies with the 400 lb per month exemption threshold, and is exempt from the requirements of the rule (except for the record retention requirements of Section 110.3). Section 110.3 requires that exempt facilities maintain all records necessary to demonstrate compliance with the exemption level of the rule.

**1. Requirement:** Section 110.3 of the rule reads:

"Any person claiming an exemption under this Section shall have information available, such as purchase orders or hazardous waste manifests, that would allow the Air Pollution Control Officer to verify facility usage."

**Subsuming Demonstration:** For P-77-92(a) the letterpress and silkscreen printing operation is subject to other federally enforceable coating and solvent usage tracking requirements based on the authority of District Rule 3.4 which are more stringent than the requirement of section 110.3, and therefore, this Rule 2.29 requirement can be subsumed by the Rule 3.4 requirements.

**Subsuming conditions:** The Permit Holder shall on a monthly basis record the type, the amount, and the as-applied VOC-content of each ink and adhesive used in the printing operation. [District Rule 3.4/C-10-123]

The Permit Holder shall on a monthly basis record the type, the amount, and the as-applied VOC-content of each solvent used in the printing operation. [District Rule 3.4/C-10-123]

**District Rule 2.31-Surface Preparation and Cleanup**

This rule was revised on May 14, 2008, however the rule has not yet been approved as part of the SIP, therefore the previous (SIP-approved) version was evaluated here.

**1. Requirement:** Section 301 of the rule reads:

"A person shall not use a solvent to perform solvent cleaning operations, including the use of cleaning devices or methods, unless the solvent complies with the applicable requirements set forth below:

301.1 On or after January 1, 1996, the solvents used on substrates during the manufacturing process or for surface preparation prior to coating, adhesive, or ink applications shall have a VOC content of 200 grams or less of VOC per liter of

material.

301.2 On and after January 1, 1996, the solvents used for maintenance and repair cleaning shall have a VOC content of 900 grams or less of VOC per liter of material and a VOC composite partial pressure of 20 mm Hg or less at 20°C (68°F).

301.3 On and after January 1, 1996, the solvents used for cleaning coatings or adhesives application equipment shall have a VOC content of 950 grams or less of VOC per liter of material and a VOC composite partial pressure of 35 mm Hg or less at 20°C (68°F).

301.4 On and after January 1, 1996, the solvents used for cleaning polyester resin application equipment shall comply with one of the limits specified below:

- a. The solvent shall have a VOC content of 200 grams or less of VOC per liter of material;
- b. The solvent shall have a VOC content of 1100 grams or less of VOC per liter and a VOC composite partial pressure of 1.0 mm Hg or less at 20°C (68°F); or
- c. A solvent reclamation system shall be used if the solvent exceeds the limits of Sections 301.4.a and 301.4.b, and the solvent usage at the facility exceeds four gallons on any one day. The

301.5 On and after January 1, 1996, the solvent used for cleaning of ink application equipment in graphic arts shall meet the limits specified below:

- a. The solvents used in screen printing shall have a VOC content of 1070 grams or less of VOC per liter of material and a VOC composite partial pressure of 5 mm Hg or less at 20°C (68°F).
- b. The solvents used in lithographic and letterpress printing not subject to the provisions of Section 301.5.d shall have a VOC content of 900 grams or less of VOC per liter of material and a VOC composite partial pressure of 25 mm Hg or less at 20°C (68°F).
- c. The solvents used in graphic arts printing operations not subject to the provisions of Sections 301.5.a, 301.5.b, or 301.5.d shall have a VOC content of 100 grams or less of VOC per liter of material and a VOC composite partial pressure of 3 mm Hg or less at 20°C (68°F).
- d. The solvents used in graphic arts printing operations, except screen printing to remove ultraviolet inks from application equipment, shall have a VOC content of 800 grams or less of VOC per liter of material and a VOC composite partial pressure of 33 mm Hg or less at 20°C (68°F).

301.6 On and after January 1, 1996, the solvents used for manufacturing or maintenance cleaning of electronic assemblies shall have a VOC content of 900 grams or less of VOC per liter of material and a VOC composite partial pressure of 33 mm Hg or less at 20°C (68°F)."

**Subsuming Demonstration:** The graphic arts printing operation is subject to other federally enforceable solvent VOC content requirements based on the authority of District Rule 3.4 which is more stringent, and therefore, these Rule 2.31 requirements can be subsumed by Rule 3.4 requirements.

**Subsuming Conditions:** The maximum as-applied VOC-content of solvents used to clean silkscreen ink from application equipment shall not exceed 100 g/L (0.83 lb/gallon). [District Rule 3.4/C-10-123]

The maximum as-applied VOC-content of solvents used to clean letterpress ink from application equipment shall not exceed 238 g/L (1.99 lb/gallon). [District Rule 3.4/C-10-123]

The maximum as-applied VOC-content of solvents used to clean all other materials from application equipment shall not exceed 25 g/L (0.21 lb/gallon). [District Rule 3.4/C-10-123]

The maximum as-applied VOC-content of solvents used for product cleaning or general applications shall not exceed 25 g/L (0.21 lb/gallon). [District Rule 3.4/C-10-123]

**2. Requirement:** Section 302 of the rule reads:

"A person shall not perform solvent cleaning operations unless one of the following cleaning devices or methods is used:

302.1 Wipe cleaning;

302.2 Spray bottles or containers with a maximum capacity of 16 fluid ounces from which solvents are applied without a propellant-induced force;

302.3 Cleaning equipment which has a solvent container that can be, and is, closed during cleaning operations, except when depositing and removing objects to be cleaned, and is closed during non-operation with the exception of maintenance and

repair to the cleaning equipment itself;

302.4 Cleaning device or mechanism which has been determined by the Air Pollution Control Officer to result in equivalent or lower emissions;

302.5 Remote reservoir cold cleaner used pursuant to Section 303 of this Rule;

302.6 Non-atomized solvent flow method where the cleaning solvent is collected in a container or a collection system which is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container; or

302.7 Solvent flushing method where the cleaning solvent is discharged into a container which is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container. The discharged solvent from the equipment must be collected into containers without atomizing into the open air. The solvent may be flushed through the system by air or hydraulic pressure, or by pumping."

**Subsuming Demonstration:** The graphic arts printing operation is subject to other federally enforceable solvent cleaning method requirements based on the authority of District Rule 3.4 which are more stringent, and therefore, these Rule 2.31 requirements can be subsumed by Rule 3.4 requirements.

**Subsuming Condition:** A person shall not perform surface preparation and cleanup using a solvent with a VOC content greater than 25 g/L unless one of the following cleaning devices or methods is used:

- a. Wipe Cleaning;
- b. Spray bottles or containers with a maximum capacity of 16 fluid ounces from which solvents are applied without a propellant-induced force; or
- c. Any other method approved by the District. [District Rule 3.4/C-10-123]

**3. Requirement:** Section 303 of the rule reads:

"Any person owning or operating a remote reservoir cold cleaner shall comply with all of the following requirements:

303.1 Prevent solvent vapors from escaping from the solvent container by using such devices as a cover or a valve when the remote reservoir is not being used, cleaned, or repaired;

303.2 Limit draft rate in the work room, as measured within three (3) feet from the location of the solvent discharge and parallel to the plane of the remote reservoir cold cleaner opening, to less than 9.1 meters per minute (30 feet per minute), unless necessary to meet Occupational Health and Safety Administration (OSHA) requirements;

303.3 Direct solvent flow in a manner that will prevent liquid solvent from splashing outside of the remote reservoir cold cleaner;

303.4 Do not degrease porous or absorbent materials, such as cloth, leather, rope, and wood; and

303.5 Use only solvent containers free of all liquid leaks. Auxiliary equipment, such as pumps, pipelines, or flanges shall not have any liquid leaks, visible tears, or cracks. Any liquid leak, visible tear, or crack detected shall be repaired within one calendar day, or the leaking section of the remote reservoir cold cleaner shall be drained of all solvent and shut down until it is replaced or repaired."

The facility is subject to Rule 2.31, but the requirements of this section do not require permit conditions.

**4. Requirement:** Section 304 of the rule reads:

"All VOC-containing materials used in solvent cleaning operations, regardless of their VOC-content, such as solvents, and cloth and paper moistened with solvents, shall be stored in non-absorbent, non-leaking containers which shall be kept closed at all times except when filling or emptying."

**Subsuming Demonstration:** The graphic arts printing operation is subject to another federally enforceable storage and disposal requirement based on the authority of District Rule 3.4 which is more stringent, and therefore this Rule 2.31 requirement can be subsumed by the Rule 3.4 requirement.

**Subsuming Condition:** The Permit Holder shall store all VOC-containing materials (including shop rags and towels) used in the printing operation, regardless of their VOC-content, in non-absorbent, non-leaking containers. The containers are to be kept closed at all times except when filling or emptying. [District Rule 3.4/C-10-123]

**5. Requirement:** Section 305 of the rule reads:

"In lieu of complying with the requirements in Sections 301, 302, or 306.1 of this Rule, a person may comply by using collection and control systems in association with the solvent cleaning operation subject to this Rule provided:

305.1 The collection system collects at least 90 percent, by weight, of the emissions generated by the solvent cleaning operation; and the control system reduces VOC emissions from the emission collection system by at least 95 percent, by weight; or

305.2 The collection system collects at least 90 percent, by weight, of the emissions generated by the solvent cleaning operation; and the output of the control system is less than 50 parts per million weight (ppmw) calculated as carbon with no dilution."

The facility is subject to Rule 2.31, but the requirements of this section do not require permit conditions.

**6. Requirement:** Section 306 of the rule reads:

"306.1 On or after January 1, 1996, a person shall not atomize any solvent into open air.

306.2 On or after January 1, 1996, a person shall not specify or require any person to use solvent or equipment subject to the provisions of this Rule that do not meet the requirements of this Rule."

The facility is subject to Rule 2.31, but the requirements of this section do not require permit conditions.

**7. Requirement:** Section 501 of the rule reads:

"Records shall be maintained pursuant to this Section, for all applications subject to this Rule, including those exempted under Sections 110 through 118 of this Rule, except for cleaning operations performed with a solvent which has a water content of 98 percent or more, by weight, or a VOC composite partial pressure of 0.1 mm Hg or less at 20°C (68°F). Each owner or operator of a facility subject to the provisions of this Rule shall collect and record all information necessary to demonstrate daily compliance with the requirements of Section 300 of this Rule or with the exemption conditions of Sections 110 through 118 of this Rule, and shall maintain this information at the facility for a period of two years. The information shall be collected and recorded monthly, and shall be made available to the Air Pollution Control Officer upon request. The information shall include, but not limited to, the following:

501.1 Identification of each solvent cleaning operation and other process at the facility subject to this Rule. the identification shall include location, permit number (if applicable), description of activity, and substrate type;

501.2 The amount and type of each VOC-containing material used at each operation and process, including exempt compounds. Use of amounts of one pint per week or less may be recorded on a monthly basis;

501.3 The VOC content of each VOC-containing material;

501.4 Where applicable, the vapor pressure of each VOC-containing material; and

501.5 Records demonstrating compliance with Section 305 of this Rule."

**Subsuming Demonstration:** The graphic arts printing operation is subject to other federally enforceable record keeping requirements based on the authority of District Rule 3.4 which is more stringent, and therefore this Rule 2.31 requirement can be subsumed by the Rule 3.4 requirements.

**Subsuming Conditions:** The Permit Holder shall maintain a current list that includes the following for all VOC containing materials:

- a. Material name and manufacturer's product data sheet or material safety data sheet (MSDS);
- b. Material application method;
- c. Material category and specific mix ratio;
- d. Actual VOC content (in g/l or lb/gallon); and
- e. As-applied regulatory VOC content (in g/l or lb/gallon). [District Rule 3.4/C-10-123]

The Permit Holder shall on a monthly basis record the type, the amount, and the as-applied VOC-content of each solvent used in the printing operation. [District Rule 3.4/C-10-123]

The Permit Holder shall maintain purchase records identifying the type, name, and volume of each VOC containing material, and any other records necessary to demonstrate compliance with this permit. [District Rule 3.4/C-10-123]

**8. Requirement:** Section 502 of the rule reads:

"For the purposes of this Rule, the following test methods shall be used. Other test methods determined to be equivalent and

approved in writing by the District, Air Resources Board, and the US Environmental Protection Agency may also be used. VOC emissions or other parameters determined to exceed any limits established by this Rule through the use of any of the following test methods shall constitute a violation of this Rule.

502.1 The VOC content of materials subject to the provisions of this Rule shall be determined by EPA Reference Test Method 24 (40 CFR 60, Appendix A).

502.2 The efficiency of the emissions collection system shall be determined by the EPA method described at 40 CFR 52.741(a)(4)(iii).

502.3 The efficiency of the control device shall be determined by the EPA method described at 40 CFR 52.741(a)(4)(iv). The VOC content measured and calculated as carbon in the control device shall be determined by EPA Reference Test Method 25 or 25A (40 CFR 60, Appendix A).

502.4 The identity of components in solvents shall be determined by EPA Reference Test Method 18 (40 CFR 60, Appendix A).

502.5 Vapor pressure of a VOC shall be determined by ASTM Test Method D 2879-86 or may be obtained from a published source such as: Boublik, T., V. Freid and E. Hala, "The Vapor Pressure of Pure Substances", Elsevier Scientific Publishing Co., New York (1973), Perry's Chemical Engineer's Handbook, McGraw-Hill Book Company (1984), CRC Handbook of Chemistry and Physics, Chemical Rubber Publishing Company (1986-87), and Lange's Handbook of Chemistry, John A. Dean, editor, McGraw-Hill Book Company (1985).

502.6 Measurement of average workroom draft rate shall be measured parallel to the remote reservoir cold cleaner opening with a thermistor anemometer which has an accuracy of ±2 percent of reading plus 1/2 percent of full scale and is annually factory-calibrated in a National Institute of Standards and Technology traceable wind tunnel."

The facility is subject to Rule 2.31, but the requirements of this section do not require permit conditions.

**District Rule 2.33-Adhesive Operations**

Per Section 110.4, the provisions of this rule do not apply since the adhesives are subject to consumer products regulation of Title 17, Section 94507 of the California Code of Regulations.

**District Rule 3.4-New Source Review**

**PROPOSED EMISSION SUMMARY FOR NEW OR MODIFIED PERMIT**

	<u>Daily</u>	<u>Yearly</u>	
VOC	22.7 lb	0.24 tons	Use for annual billing
CO	0.0 lb	0.00 tons	Use for annual billing
NOx	0.0 lb	0.00 tons	Use for annual billing
SOx	0.0 lb	0.00 tons	Use for annual billing
PM10	0.0 lb	0.00 tons	Use for annual billing

	<u>Quarterly</u>			
	<u>1st</u>	<u>2nd</u>	<u>3rd</u>	<u>4th</u>
VOC (lb)	130	130	130	130
CO (lb)	0	0	0	0
NOx (lb)	0	0	0	0
SOx (lb)	0	0	0	0
PM10 (lb)	0	0	0	0

**Previous quarterly potential to emit for modified permit\***

	<u>1st</u>	<u>2nd</u>	<u>3rd</u>	<u>4th</u>
VOC (lb)	130	130	130	130
CO (lb)	0	0	0	0
NOx (lb)	0	0	0	0
SOx (lb)	0	0	0	0
PM10 (lb)	0	0	0	0

\* From PTO P-77-92(a)

**Historic potential emissions for modified permit\***

	<u>1st</u>	<u>2nd</u>	<u>3rd</u>	<u>4th</u>
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VOC (lb)	130	130	130	130
CO (lb)	0	0	0	0
NOx (lb)	0	0	0	0
SOx (lb)	0	0	0	0
PM10 (lb)	0	0	0	0

\* The throughput report from 2008 documented 750.77 lbs of Low-VOC Silkscreen Ink, which was 375 % of permitted throughput. Therefore, because the historic emissions are over 80% in at least one year out of the last five, the historic potential equals the previous potential to emit.

<u>Pollutant</u>	<u>Trigger</u> (lb/day)	<u>BACT</u>		<u>Quarterly Increase</u>	<u>BACT</u>
		<u>Proposed</u> (lb/day)			
VOC	10	23		No	No
CO	250	0		No	No
NOx	10	0		No	No
SOx	80	0		No	No
PM10	80	0		No	No

#### OFFSETS

##### Quarterly permitted emissions for other permits at the stationary source\*

	<u>1st</u>	<u>2nd</u>	<u>3rd</u>	<u>4th</u>
VOC (lb)	19,710	19,817	20,013	19,967
CO (lb)	44,306	44,612	44,918	44,918
NOx (lb)	35,187	35,515	35,781	35,781
SOx (lb)	499	507	510	510
PM10 (lb)	4,621	4,658	4,709	4,700

\* See attached quarterly PTE determination

##### Quarterly permitted emissions for the stationary source including proposed emissions

	<u>1st</u>	<u>2nd</u>	<u>3rd</u>	<u>4th</u>
VOC (lb)	19,839	19,946	20,142	20,096
CO (lb)	44,306	44,612	44,918	44,918
NOx (lb)	35,187	35,515	35,781	35,781
SOx (lb)	499	507	510	510
PM10 (lb)	4,621	4,658	4,709	4,700

##### Offset triggers

	<u>1st</u>	<u>2nd</u>	<u>3rd</u>	<u>4th</u>
VOC (lb)	7,500	7,500	7,500	7,500
CO (lb)	49,500	49,500	49,500	49,500
NOx (lb)	7,500	7,500	7,500	7,500
SOx (lb)	13,650	13,650	13,650	13,650
PM10 (lb)	13,650	13,650	13,650	13,650

##### Quantity of offsets required

	<u>1st</u>	<u>2nd</u>	<u>3rd</u>	<u>4th</u>
VOC (lb)	0	0	0	0
CO (lb)	0	0	0	0
NOx (lb)	0	0	0	0
SOx (lb)	0	0	0	0
PM10 (lb)	0	0	0	0

#### MAJOR MODIFICATION

##### Facility Total Potential to Emit\*

36.30 TPY VOC  
81.33 TPY CO  
67.32 TPY NOx  
1.10 TPY SOx  
9.13 TPY PM10

##### Major Source Thresholds

25 TPY VOC  
100 TPY CO  
25 TPY NOx  
100 TPY SOx  
100 TPY PM10

\* See attached quarterly PTE determination

##### Last five year emission aggregate\*

##### Major Modification Thresholds

0.10 TPY VOC	25 TPY VOC
0.26 TPY CO	100 TPY CO
1.09 TPY NOx	25 TPY NOx
0.01 TPY SOx	40 TPY SOx
0.24 TPY PM10	25 TPY PM10

\* See attached 5 year aggregate worksheet

**Result: The proposed modification is not a major modification**

**PUBLIC NOTICE**

**"Increase in historic potential to emit"**

0 lb VOC/quarter  
0 lb CO/quarter  
0 lb NOx/quarter  
0 lb SOx/quarter  
0 lb PM10/quarter

**Exemption level for notification**

7,500 lb VOC/quarter  
49,500 lb CO/quarter  
7,500 lb NOx/quarter  
13,650 lb SOx/quarter  
13,650 lb PM10/quarter

**Result: Public notice is not required**

**1. Requirement:**

The VOC emissions from the graphic arts operation shall not exceed 22.7 lb/day, 130 lb/1st calendar quarter, 130 lb/2nd calendar quarter, 130 lb/3rd calendar quarter, 130 lb/4th calendar quarter, and 483 lb/calendar year. [District Rule 3.4/C-10-123]

**2. Requirement:**

The maximum as-applied VOC-content (excluding water and exempt compounds) of letterpress inks shall not exceed 300 g/L (2.5 lb/gallon). [District Rule 3.4/C-10-123]

**3. Requirement:**

The maximum as-applied VOC-content (excluding water and exempt compounds) of the high-VOC silkscreening inks shall not exceed 840 g/L (7.0 lb/gallon). [District Rule 3.4/C-10-123]

**4. Requirement:**

The maximum as-applied VOC-content (excluding water and exempt compounds) of the medium-VOC silkscreening inks shall not exceed 540 g/L (4.5 lb/gallon). [District Rule 3.4/C-10-123]

**5. Requirement:**

The maximum as-applied VOC-content (excluding water and exempt compounds) of the low-VOC silkscreening inks shall not exceed 40 g/L (0.33 lb/gallon). [District Rule 3.4/C-10-123]

**6. Requirement:**

The maximum as-applied VOC-content (excluding water and exempt compounds) of adhesives used in the printing operation shall not exceed 660 g/L (5.5 lb/gallon). [District Rule 3.4/C-10-123]

**7. Requirement:**

The Permit Holder shall not discharge into the atmosphere any air contaminant for a period or periods aggregating more than 3 minutes in any one hour which is:

- a. As dark or darker in shade than No. 1 on the Ringelmann Chart; or
- b. Greater than 20% opacity. [District Rule 3.4/C-10-123]

**8. Requirement:**

The Permit Holder shall on a monthly basis record the type, the amount, and the as-applied VOC-content of each ink and adhesive used in the printing operation. [District Rule 3.4/C-10-123]

**9. Requirement:**

The Permit Holder shall on a monthly basis record the type, the amount, and the as-applied VOC-content of each solvent used in the printing operation. [District Rule 3.4/C-10-123]

**10. Requirement:**

The maximum as-applied VOC-content of solvents used to clean silkscreen ink from application equipment shall not exceed 100 g/L (0.83 lb/gallon). [District Rule 3.4/C-10-123]

**11. Requirement:**

The maximum as-applied VOC-content of solvents used to clean letterpress ink from application equipment shall not exceed 238 g/L (1.99 lb/gallon). [District Rule 3.4/C-10-123]

**12. Requirement:**

The maximum as-applied VOC-content of solvents used to clean all other materials from application equipment shall not exceed 25 g/L (0.21 lb/gallon). [District Rule 3.4/C-10-123]

**13. Requirement:**

The maximum as-applied VOC-content of solvents used for product cleaning or general applications shall not exceed 25 g/L (0.21 lb/gallon). [District Rule 3.4/C-10-123]

**14. Requirement:**

A person shall not perform surface preparation and cleanup using a solvent with a VOC content greater than 25 g/L unless one of the following cleaning devices or methods is used:

- a. Wipe Cleaning;
- b. Spray bottles or containers with a maximum capacity of 16 fluid ounces from which solvents are applied without a propellant-induced force; or
- c. Any other method approved by the District. [District Rule 3.4/C-10-123]

**15. Requirement:**

The Permit Holder shall store all VOC-containing materials (including shop rags and towels) used in the printing operation, regardless of their VOC-content, in non-absorbent, non-leaking containers. The containers are to be kept closed at all times except when filling or emptying. [District Rule 3.4/C-10-123]

**16. Requirement:**

The Permit Holder shall maintain a current list that includes the following for all VOC containing materials:

- a. Material name and manufacturer's product data sheet or material safety data sheet (MSDS);
- b. Material application method;
- c. Material category and specific mix ratio;
- d. Actual VOC content (in g/l or lb/gallon); and
- e. As-applied regulatory VOC content (in g/L or lb/gallon). [District Rule 3.4/C-10-123]

**17. Requirement:**

The Permit Holder shall maintain purchase records identifying the type, name, and volume of each VOC containing material, and any other records necessary to demonstrate compliance with this permit. [District Rule 3.4/C-10-123]

**District Rule 3.8-Federal Operating Permits**

This rule implements the requirements of Title V of the Federal CAA as amended in 1990 for permits to operate. Title V provides for the establishment of operating permit programs for sources which emit regulated air pollutants, including attainment and non-attainment pollutants.

The source is in compliance with the requirements of this rule. The source currently has one proposed change for which the District is issuing an ATC, which is being processed according to the District's Enhanced NSR guidelines in District Rule 3.4, Section 404.

In accordance with District Rule 3.8, section 409, a minor permit modification requires that the District provide written notice, proposed permit, and District Analysis to the USEPA, California Air Resources Board, all interested parties and agencies, and the source. The proposed permit will have a 5 working day regulatory review period.

Upon implementation of the District ATC into a PTO, the source may submit a written request for District action to amend the Title V operating permit pursuant to District Rule 3.8, section 404.1. Since the District ATC has been processed according to enhanced NSR guidelines, upon written request by the source, the District shall incorporate the changes into the Title V permit as an administrative permit amendment pursuant to District Rule 3.8, section 412.1.

**1. Requirement:**

All required records shall be retained for a minimum of five (5) years and shall be made available for District inspection upon request. [District Rule 3.8, section 302.6(b)/C-10-123]

**District Rule 3.20-Ozone Transport Mitigation**

As documented above, the facility total potential to emit is above 10 tons per year for VOC or NOx, and therefore the post-project Stationary Source Potential to Emit (SSPE) will be calculated.

**Annual permitted emissions for the stationary source including proposed emissions**

VOC (lb)	72,606	lbs
NOx (lb)	134,631	lbs

**Annual permitted emissions for equipment which is exempt from Rule 3.4\***

VOC (lb)	486	lbs
NOx (lb)	9,912	lbs

\* From PTOs P-27-95, P-28-95, P-29-95, P-30-95, P-31-95, P-64-04, P-51-10, P-131-95, P-132-95, P-203-95, P-7-98(a), and P-19-08 for emergency engines

**Post-project Stationary Source Potential to Emit (SSPE)**

VOC (lb)	72,120	lbs
NOx (lb)	124,719	lbs

Because the post-project SSPE is greater than 10 tons (20,000) lbs per year for VOC or NOx, per section 301.1, calculations shall be performed to determine the quantity of mitigation required, if any.

**Pre-project Stationary Source Potential to Emit (SSPE)**

VOC (lb)	72,120	lbs
NOx (lb)	124,719	lbs

**Quantity of offsets required by Rule 3.4**

VOC (lb)	0	lbs
NOx (lb)	0	lbs

**Quantity of Mitigation required by Rule 3.20**

VOC (lb)	0	lbs
NOx (lb)	0	lbs

**District Risk Management Plan and Risk Assessment Guidelines**

The application does not propose an increase of the permitted emission limits. As such, the District does not expect an increase in any associated hazardous air pollutant emissions. As allowed by the RMPRAG policy, no toxics review is required for the facility.

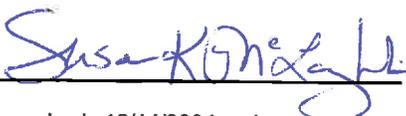
**COMMENTS:**

- BACT is not triggered
- NSR public notice is not required
- Offsets are not required
- Rule 3.20 mitigation is not required
- Title V regulatory notice is required

**RECOMMENDATIONS:** Perform the regulatory notice

Engineer: 

Date: 6/23/11

Reviewed by: 

Date: 6/30/11

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**YOLO-SOLANO AIR QUALITY MANAGEMENT DISTRICT**  
 1847 Galileo Ct., Suite F-103, Davis, Ca 95618

## New Source Review

### Quarterly Potential To Emit Determination

NSR Version 8/13/97

Evaluation to be used on existing permits to obtain their quarterly PTE.

SIC Code # 9223

Engineer/Evaluator: Kyle Rohlfing

Facility Name: California Medical Facility, California State Prison - Solano, and Prison Industry Authority

Date of Initial Quarterly PTE Determination: 09/18/1998  
 Date of Previous Quarterly PTE Determination: 04/22/2010  
 Date of Current Quarterly PTE Determination: 04/08/2011

Location: 1600 California Drive and 2100 Peabody Road; Vacaville, CA

**CURRENT APPLICATIONS:**

**AIC's**  
C-10-123

Current Permits:	VOC Emissions				CO Emissions				NOx Emissions				SOx Emissions				PM10 Emissions				
	QTR 1 (lbs)	QTR 2 (lbs)	QTR 3 (lbs)	QTR 4 (lbs)	Annual (TPY)	QTR 1 (lbs)	QTR 2 (lbs)	QTR 3 (lbs)	QTR 4 (lbs)	Annual (TPY)	QTR 1 (lbs)	QTR 2 (lbs)	QTR 3 (lbs)	QTR 4 (lbs)	Annual (TPY)	QTR 1 (lbs)	QTR 2 (lbs)	QTR 3 (lbs)	QTR 4 (lbs)	Annual (TPY)	
<b>Prison Industry Authority</b>																					
Coating: Metal Parts P-22-04(a)	577	588	618	618	1.20	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Coating: Metal Parts P-41-88(a1)	1,067	1,063	1,108	1,062	2.10	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Combustion Emission Cap CAP	22	23	23	23	0.05	344	348	351	351	0.70	408	414	418	418	0.83	0	0	0	0	0	0
Enclosed Steel Shot Blasting P-42-88	0	0	0	0	0.00	0	0	0	0	0.00	0	0	0	0	0.00	0	0	0	0	0	0
Letterpress and Silkscreen Printing P-77-92(a)	130	130	130	130	0.24	0	0	0	0	0.00	0	0	0	0	0.00	0	0	0	0	0	0
Institutional Laundry C-10-123	130	130	130	130	0.24	0	0	0	0	0.00	0	0	0	0	0.00	0	0	0	0	0	0
Coating: Automotive P-55-97	34	34	34	34	0.06	135	135	135	135	0.23	643	643	643	643	1.11	4	4	4	4	0.01	77
Coating: Automotive P-133-95	2,153	2,153	2,153	2,153	5.23	0	0	0	0	0.00	0	0	0	0	0.00	0	0	0	0	0.00	306
Coating: Automotive P-53-88(a)	1,619	1,637	1,655	1,655	2.17	0	0	0	0	0.00	0	0	0	0	0.00	0	0	0	0	0.00	210
PIA Pre-Project SSPE (lb/year)	5,603	5,619	5,722	5,676	22.100	479	483	486	486	1,854	1,052	1,057	1,061	1,061	3,879	6	6	6	6	30	1,122
PIA Post-Project SSPE (lb/year)	5,602	5,618	5,721	5,675	22.100	479	483	486	486	1,854	1,052	1,057	1,061	1,061	3,879	6	6	6	6	30	1,122
No Emergency Equipment	5,603	5,619	5,722	5,676	11.05	479	483	486	486	0.93	1,052	1,057	1,061	1,061	1.94	6	6	6	6	0.01	1,122
PIA Pre-Project PIA Total PTE	5,602	5,618	5,721	5,675	11.05	479	483	486	486	0.93	1,052	1,057	1,061	1,061	1.94	6	6	6	6	0.01	1,122
PIA Post-Project PIA Total PTE	5,602	5,618	5,721	5,675	11.05	479	483	486	486	0.93	1,052	1,057	1,061	1,061	1.94	6	6	6	6	0.01	1,122
PIA Policy 25 Post-Project PIA Total PTE	5,602	5,618	5,721	5,675	11.05	479	483	486	486	0.93	1,052	1,057	1,061	1,061	1.94	6	6	6	6	0.01	1,122
<b>California State Prison - Solano</b>																					
Coating: Wood Products P-3-90	1,040	1,040	1,040	1,040	0.52	0	0	0	0	0.00	0	0	0	0	0.00	0	0	0	0	0.00	0
Woodworking P-35-92	0	0	0	0	0.00	0	0	0	0	0.00	0	0	0	0	0.00	0	0	0	0	0.00	185
Woodworking P-36-92	0	0	0	0	0.00	0	0	0	0	0.00	0	0	0	0	0.00	0	0	0	0	0.00	165
Coating: Metal Parts P-167-95	819	819	819	819	0.46	0	0	0	0	0.00	0	0	0	0	0.00	0	0	0	0	0.00	27
CSP Pre-Project SSPE (lb/year)	1,859	1,859	1,859	1,859	1,960	0	0	0	0	0	0	0	0	0	0.00	0	0	0	0	0.00	397
CSP Post-Project SSPE (lb/year)	1,859	1,859	1,859	1,859	1,960	0	0	0	0	0	0	0	0	0	0.00	0	0	0	0	0.00	397
P-27-95	25	25	25	25	0.01	56	56	56	56	0.03	259	259	259	259	0.13	4	4	4	4	0.00	18
Emergency IC Engine (960 BHP) P-28-95	25	25	25	25	0.01	56	56	56	56	0.03	259	259	259	259	0.13	4	4	4	4	0.00	18
Emergency IC Engine (940 BHP) P-29-95	25	25	25	25	0.01	56	56	56	56	0.03	259	259	259	259	0.13	4	4	4	4	0.00	18
Emergency IC Engine (940 BHP) P-30-95	25	25	25	25	0.01	56	56	56	56	0.03	259	259	259	259	0.13	4	4	4	4	0.00	18
Emergency IC Engine (750 BHP) P-31-95	21	21	21	21	0.01	49	49	49	49	0.02	225	225	225	225	0.11	3	3	3	3	0.00	18
Emergency IC Engine (415 BHP) P-64-04	19	19	19	19	0.01	83	83	83	83	0.04	805	805	805	805	0.40	34	34	34	34	0.00	16
Emergency IC Engine (165 BHP) P-51-10	83	83	83	83	0.04	65	65	65	65	0.03	271	271	271	271	0.14	0	0	0	0	0.00	16
CSP Pre-Project PIA Total PTE	2,082	2,082	2,082	2,082	1.09	421.15	421.15	421.15	421.15	0.21	2,337.36	2,337.36	2,337.36	2,337.36	1.17	53.40	53.40	53.40	53.40	0.00	513.24
CSP Post-Project PIA Total PTE	2,082	2,082	2,082	2,082	1.09	421.15	421.15	421.15	421.15	0.21	2,337.36	2,337.36	2,337.36	2,337.36	1.17	53.40	53.40	53.40	53.40	0.00	513.24
CSP Policy 25 Post-Project PIA Total PTE	1,859	1,859	1,859	1,859	0.96	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	395.50
<b>California Medical Facility</b>																					
Coating: Metal Parts & Wood Products P-72-88	4,069	4,069	4,069	4,069	8.10	0	0	0	0	0.00	0	0	0	0	0.00	0	0	0	0	0.00	0
Non-Retail GDF P-42-90(a3)	55	55	55	55	0.11	0	0	0	0	0.00	0	0	0	0	0.00	0	0	0	0	0.00	0
Woodworking P-37-92	0	0	0	0	0.00	0	0	0	0	0.00	0	0	0	0	0.00	0	0	0	0	0.00	0
IC Engine Co-Generation Boiler (44.8 MMBtu/hr) P-130-95(a)	6,571	6,644	6,717	6,717	12.41	20,802	21,033	21,265	21,265	39.29	20,505	20,733	20,961	20,961	38.73	310	314	317	317	0.59	605
P-9-00	532	538	544	544	1.08	7,510	7,510	7,510	7,510	12.70	4,306	4,336	4,336	4,336	6.86	58	59	59	59	0.12	735
P-10-00	532	538	544	544	1.08	7,510	7,510	7,510	7,510	12.70	4,306	4,336	4,336	4,336	6.86	58	59	59	59	0.12	735
Boiler (39.5 MMBtu/hr) P-11-00	469	474	480	480	0.95	5,689	5,722	5,776	5,776	11.25	3,797	3,823	3,849	3,849	6.04	51	52	52	52	0.10	648



**YOLO-SOLANO AIR QUALITY MANAGEMENT DISTRICT**  
1947 Galileo Ct., Suite #103, Davis, Ca 95616

**New Source Review  
Last Five Year Activity**

Evaluator: Kyle Rohlfing

SIC Code # 9223

Facility Name: CMF, CSP, and PIA

Date of Initial Determination: 03/21/2003

Date of Previous Determination: 06/08/2010

Date of Current Determination: 04/18/2011

Location: 1600 California Drive and 2100 Peabody Road; Vacaville, CA

Facility	Process	Issued Permits	Date PTO Issued	ATC	Date ATC Issued	VOC (tpy)	CO (tpy)	NOx (tpy)	SOx (tpy)	PM10 (tpy)
CSP	Coating: Automotive	P-53-88	-	-	-	2.88	0.00	0.00	0.00	0.06
PIA	Metal Grinding	P-48-97	11/05/1997	C-97-47	06/05/1997	0.00	0.00	0.00	0.00	0.06
CMF	Non-Retail GDF	P-42-90(a)	12/22/1997	C-97-112	11/17/1997	0.05	0.00	0.00	0.00	0.00
PIA	Institutional Laundry	P-55-97	12/22/1997	A-54-97	12/22/1997	0.06	0.23	1.11	0.01	0.13
PIA	Coating: Metal Parts	P-41-88(a)	10/06/1999	C-99-80	07/28/1999	0.68	0.34	1.60	0.01	1.05
CMF	Boiler (44.8 MMBtu/hr) <sup>a</sup>	P-9-00	05/26/2000	C-99-102	01/26/2000	0.00	0.00	0.00	0.00	0.00
CMF	Boiler (44.8 MMBtu/hr) <sup>a</sup>	P-10-00	05/26/2000	C-99-103	01/26/2000	0.00	0.00	0.00	0.00	0.00
CMF	Boiler (39.5 MMBtu/hr) <sup>a</sup>	P-11-00	05/26/2000	C-99-104	01/26/2000	0.00	0.00	0.00	0.00	0.00
CMF	Boiler (12.6 MMBtu/hr) <sup>b</sup>	P-12-00	05/26/2000	C-99-105	01/26/2000	0.00	0.00	0.00	0.00	0.00
CMF	IC Engine Co-Generation	P-130-95(a)	03/27/2003	C-03-46	03/25/2003	0.00	10.33	0.00	0.00	0.04
CMF	Emergency IC Engine	P-7-98(a)	04/24/2003	C-03-21	03/07/2003	0.01	0.06	2.68	0.11	0.01
CSP	Emergency IC Engine	P-64-04	09/28/2004	C-02-360	05/20/2003	0.01	0.04	0.40	0.02	0.01
PIA	Coating: Metal Parts <sup>c</sup>	P-41-88(a1)	11/12/2004	C-02-142	09/29/2003	0.00	0.36	0.00	0.00	0.00
PIA	Coating: Metal Parts <sup>c</sup>	P-22-04	03/26/2004	C-03-75	09/29/2003	-	-	-	-	-
CMF	Non-Retail GDF	P-42-90(a1)	09/09/2005	C-05-35	06/08/2005	0.02	0.00	0.00	0.00	0.00
PIA	Metal Grinding <sup>d</sup>	P-48-97(a)	-	C-05-93	CANCELED	-	-	-	-	-
PIA	Letterpress and Silkscreen	P-77-92(a)	-	C-06-64	05/21/2007	0.00	0.00	0.00	0.00	0.00
CMF	Emergency IC Engine	P-70-07	-	C-07-124	11/02/2007	0.03	0.13	1.09	0.00	0.02
PIA	Mcoating: Metal Parts	-	-	C-07-176	08/05/2008	0.00	0.00	0.00	0.00	0.00
CSP	Emergency IC Engine	-	-	C-08-258	01/07/2010	0.03	0.14	0.00	0.01	0.00
CMF	Non-Retail GDF	P-42-90(a2)	01/07/2010	C-09-53	03/24/2009	0.00	0.00	0.00	0.00	0.00
CMF	Non-Retail GDF	P-42-90(a3)	06/03/2010	C-09-159	02/01/2010	0.04	0.00	0.00	0.00	0.00
PIA	Coating: Automotive	P-53-88(a)	12/20/2010	C-10-30	10/29/2010	0.00	0.00	0.00	0.00	0.22
PIA	Letterpress and Silkscreen	P-77-92(a1)	-	C-10-123	PENDING	0.00	0.00	0.00	0.00	0.00
<b>TOTAL</b>						0.10	0.26	1.09	0.01	0.24

<sup>a</sup> Split of P-8-72(a) into C-99-102, C-99-103, and C-99-104 with no emission aggregate.

<sup>b</sup> PTO P-89-89 replaced with equipment authorized by C-99-105 with no emission aggregate.

<sup>c</sup> Split of P-41-88(a) into C-02-142 and C-03-75. Because C-02-142 and C-03-75 are part of a cap, the emission aggregate represented under C-02-142.

<sup>d</sup> ATC C-05-93 and PTO P-48-97 canceled on 3/8/2006; operation deemed exempt from air quality permitting.

**COMMENTS:**

These permits are sorted by the ATC issuance dates. According to Rule 3.4 Section 221, a major modification is calculated based on all creditable increases and decreases from the source over the period of five consecutive years before the application, including the calendar year of the most recent application. Since ATC application C-10-123 was received on December 20, 2010, the applicable 5-year period ranges from December 2005 to December 2010.

Engineer:

Kyle Rohlfing

Date:

6/23/11

Reviewed by:

Suzanne K. O'Connell

Date:

6/30/11