



# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178  
(909) 396-2000 • www.aqmd.gov

March 23, 2016

Mr. Gerardo Rios  
Chief – Permits Office  
U. S. EPA, Region IX  
75 Hawthorne Street, Air 3  
San Francisco, CA 94105

Dear Mr. Rios:

Advanced Paper Box Co. (I.D. 047084) has proposed to revise their Title V permit by adding a lithographic printing system to replace an existing lithographic printing system. This is a commercial printing facility (SIC 2657) located at 6100 South Gramercy Place, Los Angeles, CA 90047. This proposed permit revision as requested under Application Number 578942 is considered as a “deminimis significant permit revision” to their Title V permit. Attached for your review are the permit evaluations and draft permit (Section H) for the proposed permit revision. With your receipt of the proposed Title V permit revision today, we will note that the EPA 45-day review period will begin on March 23<sup>rd</sup>.

If you have any questions or need additional information regarding the proposed permit revision, please call Azar Dabiri at (909) 396-2367.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Amir Dejbakhsh'.

Amir Dejbakhsh  
Assistant Deputy Executive Officer  
Engineering and Compliance

AED:1-coverletter

Attachments

<b>SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT</b> <b>ENGINEERING AND COMPLIANCE</b> Coating, Printing, Plating, Military & Entertainment Operations Team  <b>PERMIT APPLICATION EVALUATION</b>	Page	1 of 6
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	Processed By	S Kim
	Reviewed By	
	Date	02/17/2016

**PERMIT TO CONSTRUCT EVALUATION  
LITHOGRAPHIC PRINTING PRESS**

**Business Name:** ADVANCE PAPER BOX CO.

**AQMD Facility ID No.:** 47084

**Mailing Address:** 6100 SOUTH GRAMERCY PLACE, LOS ANGELES, CA 90047

**Equipment Address:** SAME AS THE ABOVE MAILING ADDRESS

**EQUIPMENT DESCRIPTION:**

**A/N 578941 (NEW CONSTRUCTION, P/C)**  
 IDENTICAL REPLACEMENT OF PO G15637 (A/N 525593) BY THE NEW CONSTRUCTION OF:

LITHOGRAPHIC PRINTING SYSTEM CONSISTING OF:

- 1) PRINTING PRESS, KBD RAPIDA, MODEL NO. 145, SERIAL NO. 370362, SEVEN COLORS, PLUS TWO COATERS AND TWO STUB UNITS, 57-INCH WIDE SHEET-FED, AND 214.4-H.P. TOTAL DRIVE.
- 2) INFRARED INTERDECK DRYERS, TOTAL 201.6 KW.
- 3) INFRARED DELIVERY DRYERS, TOTAL 124.8 KW.
- 4) UV DRYERS, TOTAL 195.53 KW.

**A/N 578942**  
 TITLE V PERMIT REVISION

**HISTORY:**

On October 16, 2015, Trinity Consultants, on behalf of Advance Paper Box Co. ("company"), submitted A/N 578941 for a Permit to Construct a new sheet-fed lithographic printing press to replace an existing sheet-fed lithographic printing press under PO G15637 (A/N 525593). A/N 578942 was submitted for the Title V permit revision. The company has requested expedited processing of the applications under Rule 301(v).

This company currently has active permits from the District to operate two lithographic printing presses. The company has a facility-wide VOC emission limit of 76 pounds per day, and the printing press to be replaced (PO G15637) has an equipment-specific VOC emission limit of 900 pounds per month. No increases in the facility-wide or equipment-specific VOC emission limit is being requested.

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District records show no complaints filed against this company in the past two years. Below table lists NC/NOV's issued to this facility in the last two years.

Notice Type	Notice No.	Issue Date	Reason
NOV*	P60856	4/22/15	Failure to submit a registration plan for AC refrigerants >50 pounds per circuit.
NC	E29871	4/9/15	Provide proof of R1415 & 1415.1 submittal for refrigerants >50 lbs per circuit.
NC	E28476	7/11/14	Submit a Rule 1415 registration form and fee to register A/C unit.

\* District records show two plan applications (A/N's 576378, 576254) were filed on 6/24/15.

This company is a Title V facility, and the proposed permit revision is considered a "de minimis significant permit revision" as described in the Regulation XXX evaluation. This is the first revision since the most recent Title V renewal, which was issued on September 16, 2011.

#### PROCESS DESCRIPTION:

This company is a paper box manufacturer where lithographic offset printing is performed on the boxes. Lithographic inks with 2.31 lbs/gal (maximum) VOC content will be used on this press. The fountain solution, as applied, has a VOC content of 0.042 pounds per gallon. The clean-up materials have 0.82 lbs/gal VOC content. Copies of the SDS's for inks and solvents are in the file. The materials comply with R1130 and 1171 requirements.

#### OPERATING SCHEDULE:

Normal: 8 hrs/day, 5 days/wk, 52 wks/yr  
 Maximum: 24 hrs/day, 7 days/wk, 52 wks/yr

#### EMISSION CALCULATIONS:

VOC emissions are expected from the evaporation of solvents contained in the inks, fountain solutions and cleaners to be used in the subject equipment.

The company currently has a facility-wide VOC emission limit of 76 pounds per day, and the printing press being replaced (PO G15637, A/N 525593) has an equipment-specific VOC emission limit of 900 pounds per month. No increases in the facility-wide or equipment-specific VOC emission limits is being requested with this application. Therefore, the emissions from the printing press being replaced (PO G15637, A/N 525593) will be transferred to this application.

#### EMISSIONS FROM A/N 525593:

AEIS:

	R1	R2
ROG	0.66 lbs/hr	0.66 lbs/hr
TOG	0.66 lbs/hr	0.66 lbs/hr

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**NSR:**

	R1 (lbs/hr)	R2 (lbs/hr)	30-DAY AVG. (lbs/day)
ROG	1.24	1.24	12
TOG	1.24	1.24	12
EG	0.0006	0.0006	0.0146
EGMBE	0.74	0.74	18.006666667
FORMALDEHYDE	0.00023	0.00023	0.005596667
NAPHTHAL	0.00009	0.00009	0.00219
TOLUENE	0.012	0.012	0.292
XYLENES_MX	1.23	1.23	29.93

**RULES / REGULATION EVALUATION:**

**RULE 212, PUBLIC NOTIFICATION**

**SUBPARAGRAPH 212(c)(1):**

This paragraph requires a public notice for all new or modified permit units that may emit air contaminants located within 1,000 feet from the outer boundary of a school. The equipment is not located within 1,000 feet of any schools. Therefore, public notice distribution will not be required under this section.

**PARAGRAPH 212(c)(2) & (g):**

This section requires a public notice for all new or modified facilities and units which have on-site emission increases exceeding any of the daily maximum as specified in subdivision (g). There will be no emission increases from the facility since the facility's existing VOC cap will remain the same. The printing press will be given a 900 lbs VOC/mo limit as an equipment limit. Therefore, a public notice will not be triggered.

Lbs/day	CO	NOX	PM <sub>10</sub>	ROG	Lead	SOX
Limit	220	40	30	30	3	60
Facility Increase	0	0	0	0	0	0
Unit Increase	0	0	0	30	0	0

**PARAGRAPH 212(c)(3):**

Please see Rule 1401 evaluation section. Public notice is not required.

**Rule 401, VISIBLE EMISSIONS**

Visible emissions are not expected with the proper operation of the equipment. Compliance is expected.

**Rule 402, NUISANCE**

Nuisance is not expected with the proper operation of the equipment. In addition, there are no recorded complaints within the past two years. Compliance is expected.

**RULE 1130, GRAPHIC ARTS**

Material information submitted with the application shows that the materials are in compliance. Compliance with this rule is expected.

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Material	Rule 1130 Limit	Submitted	Compliance
Ink Systems Inks	300 g VOC/L (2.5 lbs/gal)	2.31 lbs/gal (max.)	YES
Flint Group Inks	300 g VOC/L (2.5 lbs/gal)	2.08 lbs/gal (max.)	YES
Coating	300 g VOC/L (2.5 lbs/gal)	0.19 lbs/gal (max.)	YES
Fountain Solution (Sheet-fed, using alcohol substitute)	50 g VOC/L (0.42 lbs/gal)	0.042 lbs/gal	YES

Fountain solution as applied:

Material	Amount in solution	VOC content (lbs/gal)	VOC content (lbs)
Emerald JRDC Acid Fountain Solution	3 oz.	1.83 lbs/gal	0.043 lbs
Water	128 oz.	0 lbs/gal	0 lbs
Total	131 oz.		0.043 lbs

Fountain solution VOC content by weight:  
 $(0.043 \text{ lbs} / 131 \text{ oz}) (128 \text{ oz} / 1 \text{ gal}) = 0.042 \text{ lbs VOC/gal}$

#### RULE 1171, SOLVENT CLEANING OPERATIONS

Material information submitted with the application shows that the materials are in compliance. Compliance with this rule is expected.

Material	Rule 1171	Submitted
Nova Pressroom Plate Cleaner	100 g VOC/L (0.83 lbs/gal)	0.82 g VOC/L

#### REGULATION XIII

##### Rule 1303(a), BEST AVAILABLE CONTROL TECHNOLOGY (BACT)

The use of R1130-compliant inks/coatings, fountain solution with less than 8% VOC by volume (see calculation below), and blanket/roller wash with less than 100 g/l VOC satisfies BACT requirements.

Fountain solution VOC content by volume:

*The density of VOC when there are different types of VOC's present (per EPA) is 7.36 lbs VOC/gal VOC.*

$(0.042 \text{ lbs VOC} / \text{gal fountain sol}) / (7.36 \text{ lbs VOC} / \text{gal VOC}) = 0.006 \rightarrow 0.6\% \text{ by vol.}$

##### Rule 1303(b)(1), MODELING & Rule 1303(b)(2), EMISSION OFFSETS

Pursuant to Rule 1304(a)(1), a source is exempt from the modeling requirement of Rule 1303 (b)(1) and the offset requirement of Rule 1303(b)(2) when a "source is replacing a functionally identical source or is a functionally identical modification to a source and there is no increase in maximum rating, and the potential to emit of any air contaminant will not be greater from the new source than from the replaced source, when the replaced source was operated at the same conditions and as if current BACT were applied." This is a functionally identical replacement without any emission increases. Current BACT will be applied.

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**RULE 1401, TOXICS**

The printing press to be replaced (PO G15637, A/N 525593) has an equipment-specific VOC emission limit of 900 pounds per month; no increases in the VOC emission limit is being requested with this functionally identical replacement application. In addition, no new toxic compounds will be emitted as a result of this project, except small amounts of diethanolamine (CAS 111-42-2) and phenol (CAS 108-95-2) from the use of UV 52770 – UV S/F Gloss Coating. The SDS shows that these two compounds are present in very low concentrations. The wt % of diethanolamine (CAS 111-42-2) is 0.05% and the wt % of phenol (CAS 108-95-2) is <0.001%. According to the applicant, the maximum usage of UV 52770 – UV S/F Gloss Coating is 5 gallons/day. The expected maximum emissions of diethanolamine and phenol are calculated as follows:

$$5 \text{ gal UV 52770/day} \times 8.93 \text{ lbs/gal UV 52770} = 44.65 \text{ lbs UV 52770/day}$$

$$44.65 \text{ lbs/day} \times 0.05\% \text{ diethanolamine} = 0.022325 \text{ lbs diethanolamine/day}$$

$$44.65 \text{ lbs/day} \times 0.001\% \text{ phenol} = 0.0004464 \text{ lbs phenol/day}$$

As shown in the table below, the above-calculated emissions are well below their respective Tier 1 screening levels. Diethanolamine and phenol will be added to the list of TAC allowed for use in this equipment.

TAC	CAS No.	Yearly Emissions	Hourly Emissions	Screening Emission Level (25 Meter)	
				Chronic	Acute
Diethanolamine	111-42-2	8.15 lbs/yr	9.3e-4 lbs/hr	99.2 lbs/yr	NA
Phenol	108-95-2	0.1629 lbs/yr	1.86e-5 lbs/hr	6610 lbs/yr	2.9 lbs/hr

**REGULATION XXX:**

This facility is not in the RECLAIM program. The proposed project is considered as a “de minimis significant permit revision” to the Title V permit for this facility.

Rule 3000(b)(7) defines a “de minimis significant permit revision” as any Title V permit revision where the cumulative emission increases of non-RECLAIM pollutants or hazardous air pollutants (HAPs) from these permit revisions during the term of the permit are not greater than any of the following emission threshold levels:

Air Contaminant	Daily Maximum (lbs/day)
HAP	30
VOC	30
NOx	40
PM10	30
SOx	60
CO	220

To determine if a project is considered as a “de minimis significant permit revision” for non-RECLAIM pollutants or HAPs, emission increases for non-RECLAIM pollutants or HAPs resulting from all permit revisions that are made after the issuance of the Title V renewal permit shall be accumulated and compared to the above threshold levels. This proposed project is the first permit revision to the Title V renewal permit issued to this facility on 9/16/11. The following table summarizes the cumulative emission increases resulting from all permit revisions since the Title V renewal permit was issued:

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Coating, Printing, Plating, Military & Entertainment Operations Team

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Revision	HAP	VOC	NOx	PM <sub>10</sub>	SOx	CO
1 <sup>st</sup> Permit Revision; construction of a new lithographic printing press (A/N 578941) to replace an existing lithographic printing press under A/N 525593)	0	0	0	0	0	0
Cumulative Total	0	0	0	0	0	0
Maximum Daily	30	30	40	30	60	220

Since the cumulative emission increases resulting from all permit revisions are not greater than any of the emission threshold levels, this proposed project is considered as a "de minimis significant permit revision".

**CONCLUSION / RECOMMENDATIONS:**

The proposed project is expected to comply with all applicable District Rules and Regulations. Since the proposed project is considered as a "de minimis significant permit revision", it is exempt from the public participation requirements under Rule 3006 (b). A proposed permit incorporating this permit revision will be submitted to EPA for a 45-day review pursuant to Rule 3003(j). If EPA does not raise any objections within the review period, a revised Title V permit will be issued to this facility.

## **FACILITY PERMIT TO OPERATE ADVANCE PAPER BOX CO**

### **Facility Equipment and Requirements (Section D)**

This section consists of a table listing all permitted equipment at the facility, facility wide requirements, all individual Permits to Construct and Permits to Operate issued to various equipment at the facility, and Rule 219-exempt equipment subject to source-specific requirements. Each permit and Rule 219-exempt equipment will list operating conditions including periodic monitoring requirements, and applicable emission limits and requirements that the equipment is subject to. Also included is the rule origin and authority of each emission limit and permit condition.

**FACILITY PERMIT TO OPERATE  
ADVANCE PAPER BOX CO**

**PERMITTED EQUIPMENT LIST**

THE FOLLOWING IS A LIST OF ALL PERMITS TO CONSTRUCT AND PERMITS TO OPERATE AT THIS FACILITY:

<b>Application number</b>	<b>Permit to Operate number</b>	<b>Equipment description</b>
525593	G15637	LITHOGRAPHIC PRINTING PRESS, IR/UV DRY
525594	G15638	LITHOGRAPHIC PRINTING PRESS, IR/UV DRY
578941		LITHOGRAPHIC PRINTING PRESS, IR/UV DRY

**NOTE:** EQUIPMENT LISTED ABOVE THAT HAVE NO CORRESPONDING PERMITS TO OPERATE NUMBER ARE ISSUED PERMITS TO CONSTRUCT. THE ISSUANCE OR DENIAL OF THEIR PERMITS TO OPERATE IS SUBJECT TO ENGINEERING FINAL REVIEW. ANY OTHER APPLICATIONS THAT ARE STILL BEING PROCESSED AND HAVE NOT BEEN ISSUED PERMITS TO CONSTRUCT OR PERMITS TO OPERATE WILL NOT BE FOUND IN THIS TITLE V PERMIT.

## **FACILITY PERMIT TO OPERATE ADVANCE PAPER BOX CO**

### **FACILITY WIDE CONDITION(S)**

**Condition(s):**

1. EXCEPT FOR OPEN ABRASIVE BLASTING OPERATIONS, THE OPERATOR SHALL NOT DISCHARGE INTO THE ATMOSPHERE FROM ANY SINGLE SOURCE OF EMISSIONS WHATSOEVER ANY AIR CONTAMINANT FOR A PERIOD OR PERIODS AGGREGATING MORE THAN THREE MINUTES IN ANY ONE HOUR WHICH IS:
  - A. AS DARK OR DARKER IN SHADE AS THAT DESIGNATED NO. 1 ON THE RINGELMANN CHART, AS PUBLISHED BY THE UNITED STATES BUREAU OF MINES; OR
  - B. OF SUCH OPACITY AS TO OBSCURE AN OBSERVER'S VIEW TO A DEGREE EQUAL TO OR GREATER THAN DOES SMOKE DESCRIBED IN SUBPARAGRAPH (A) OF THIS CONDITION.  
[RULE 401]
2. MATERIAL SAFETY DATA SHEETS FOR ALL MATERIALS USED AT THIS FACILITY AND SUBJECT TO DISTRICT RULES SHALL BE KEPT CURRENT AND MADE AVAILABLE TO DISTRICT PERSONNEL UPON REQUEST.  
[RULE 109, 1303(b)(2)-OFFSET]
3. THE TOTAL QUANTITY OF VOLATILE ORGANIC COMPOUNDS (VOC) EMITTED TO THE ATMOSPHERE FROM THIS FACILITY SHALL NOT EXCEED 76 POUNDS IN ANY ONE DAY.  
[RULE 1303(b)(2)-OFFSET]
4. THE OPERATOR SHALL KEEP ADEQUATE RECORDS FOR THIS FACILITY TO VERIFY THE VOC EMISSIONS IN POUNDS PER DAY.  
[RULE 109, 1303(b)(2)-OFFSET]
5. ALL RECORDS REQUIRED BY THIS PERMIT SHALL BE PREPARED IN A FORMAT WHICH IS ACCEPTABLE TO THE DISTRICT, RETAINED AT THE FACILITY FOR AT LEAST FIVE YEARS, AND MADE AVAILABLE TO ANY DISTRICT REPRESENTATIVE UPON REQUEST.  
[RULE 109, 1303(b)(2)-OFFSET]

**FACILITY PERMIT TO OPERATE  
ADVANCE PAPER BOX CO**

**PERMIT TO OPERATE**

**Permit No. G15637  
A/N 525593**

**Equipment Description:**

LITHOGRAPHIC PRINTING SYSTEM NO. 5 CONSISTING OF:

1. PRINTING PRESS, KBA PLANETA, MODEL # RAPIDA 142-7, SERIAL NO. 361283, SEVEN COLORS, PLUS TWO COATERS, 56-INCH WIDE SHEET-FED, AND 100 H. P. TOTAL DRIVE.
2. INFRARED INTERDECK DRYER, TOTAL 4.2 KW.
3. UV INTERDECK DRYER, TWO MODULES, TOTAL 46.4 KW.
4. IR/TL DRYER, TOTAL 52.8 KW.
5. IR/THERMO-AIR DRYER, TOTAL 108.9 KW.
6. FINAL UV DRYER, TOTAL 69.6 KW.

**Conditions:**

1. OPERATION OF THIS EQUIPMENT SHALL BE CONDUCTED IN ACCORDANCE WITH ALL DATA AND SPECIFICATIONS SUBMITTED WITH THE APPLICATION UNDER WHICH THIS PERMIT IS ISSUED UNLESS OTHERWISE NOTED BELOW.  
[RULE 204]
2. THIS EQUIPMENT SHALL BE PROPERLY MAINTAINED AND KEPT IN GOOD OPERATING CONDITION AT ALL TIMES.  
[RULE 204]
3. THE TOTAL QUANTITY OF VOC EMISSIONS DISCHARGED TO THE ATMOSPHERE FROM THIS EQUIPMENT SHALL NOT EXCEED 900 POUNDS IN ANY ONE CALENDAR MONTH.  
[RULE 1303(a)(1)-BACT, 1303(b)(2)-OFFSET]

## FACILITY PERMIT TO OPERATE ADVANCE PAPER BOX CO

4. THE MATERIALS USED IN THIS EQUIPMENT SHALL NOT CONTAIN ANY TOXIC AIR CONTAMINANTS IDENTIFIED IN RULE 1401, TABLE 1 WITH AN EFFECTIVE DATE OF SEPTEMBER 10, 2010, OR EARLIER WITH THE EXCEPTION OF ACRYLIC ACID (CAS # 79-10-7), AMMONIA (CAS # 7664-41-7), COBALT (CAS # 7440-48-4), COPPER & COPPER COMPOUNDS (CAS # 7440-50-8), ETHYLENE GLYCOL MONOBUTYL ETHER (CAS # 111-76-2), ETHYLENE GLYCOL (CAS # 107-21-1), FORMALDEHYDE (CAS # 50-00-0), HYDROCHLORIC ACID (CAS# 7647-01-0), ISOPROPYL ALCOHOL (CAS # 67-63-0), MANGANESE & MANGANESE COMPOUNDS (CAS # 7439-96-5), NAPHTHALENE (CAS # 91-20-3), PHOSPHORIC ACID (CAS # 7664-38-2), SODIUM HYDROXIDE (CAS # 1310-73-2), STYRENE (CAS # 100-42-5), TOLUENE (CAS # 108-88-3), XYLENE (CAS # 1330-20-7), XYLENE (O) (CAS # 95-47-6) XYLENE (M) (CAS # 108-38-3) AND ZINC COMPOUNDS (CAS # 7440-66-6).  
[RULE 1401]
5. THE VOC CONTENT OF THE FOUNTAIN SOLUTION USED IN THIS EQUIPMENT SHALL NOT EXCEED 0.30 POUND PER GALLON OF MATERIAL, AS APPLIED, INCLUDING WATER AND EXEMPT SOLVENTS.  
[RULE 1303(a)(1)-BACT]
6. THE VOC COMPOSITE PARTIAL PRESSURE OF THE BLANKET AND ROLLER WASHES USED IN THIS EQUIPMENT SHALL NOT EXCEED 5 mmHg @ 20 DEGREES CENTIGRADE.  
[RULE 1303(a)(1)-BACT]
7. THE EMISSIONS OF CARCINOGENIC TOXIC AIR CONTAMINANTS FROM THIS EQUIPMENT SHALL NOT EXCEED THE FOLLOWING IN ANY ONE CALENDAR YEAR.  

FORMALDEHYDE	3 POUNDS
NAPHTHALENE	1 POUND

  
[RULE 1401]
8. THE OPERATOR SHALL KEEP ADEQUATE RECORDS FOR THIS EQUIPMENT TO VERIFY THE FOLLOWING:
  - A. DENSITY OF EACH INK IN POUNDS PER GALLONS.
  - B. PERCENTAGE BY WEIGHT OF LITHOGRAPHIC OILS IN EACH INK.
  - C. INK ABSORPTION FACTOR AS SPECIFIED BY CURRENT DISTRICT GUIDELINES.
  - D. VOC CONTENT, FORMALDEHYDE AND NAPHTHALENE CONTENT OF FOUNTAIN SOLUTIONS, WASH MATERIALS, AND OTHER MATERIALS USED IN POUNDS PER GALLON AS APPLIED (INCLUDING WATER AND EXEMPT COMPOUNDS).
  - E. VOC EMISSIONS IN LBS/DAY FROM THIS EQUIPMENT.
  - F. FORMALDEHYDE AND NAPHTHALENE EMISSIONS IN POUNDS PER DAY.
  - G. OTHER DATA AS REQUIRED TO VERIFY THE COMPLIANCE WITH CONDITIONS SPECIFIED IN THIS PERMIT.  
[RULE 109, 1303(b)(2)-OFFSET]

## FACILITY PERMIT TO OPERATE ADVANCE PAPER BOX CO

9. WITHIN 14 CALENDAR DAYS AFTER THE END OF EACH MONTH, THE OPERATOR SHALL TOTAL AND RECORD VOC, FORMALDEHYDE AND NAPHTHALENE EMISSIONS FOR THE MONTH FROM THE EQUIPMENT. THE RECORD SHALL INCLUDE ANY PROCEDURES USED TO ACCOUNT FOR CONTROL DEVICE EFFICIENCIES AND/OR WASTE DISPOSAL. IT SHALL BE SIGNED AND CERTIFIED FOR ACCURACY BY THE HIGHEST RANKING INDIVIDUAL RESPONSIBLE FOR COMPLIANCE WITH DISTRICT RULES.  
[RULE 109, 1303(b)(2)-OFFSET]
10. THE OPERATOR SHALL MAINTAIN A SINGLE LIST WHICH INCLUDES ONLY THE NAME AND ADDRESS OF EACH PERSON FROM WHOM THE FACILITY ACQUIRED VOC-CONTAINING MATERIALS REGULATED BY THE DISTRICT THAT WERE USED OR STORED AT THE FACILITY DURING THE PRECEDING 12 MONTHS.  
[RULE 109, 1303(b)(2)-OFFSET]
11. THE OPERATOR SHALL RETAIN ALL PURCHASE INVOICES FOR ALL VOC-CONTAINING MATERIAL USED OR STORED AT THE FACILITY, AND ALL WASTE MANIFESTS FOR ALL WASTE VOC-CONTAINING MATERIAL REMOVED FROM THE FACILITY.  
[RULE 109, 1303(b)(2)-OFFSET]

### **Emissions and Requirements:**

12. THIS EQUIPMENT IS SUBJECT TO THE APPLICABLE REQUIREMENTS OF THE FOLLOWING RULES AND REGULATIONS:  
  
VOC: RULE 109  
VOC: RULE 1130, SEE APPENDIX B FOR EMISSION LIMITS  
VOC: RULE 1171, SEE APPENDIX B FOR EMISSION LIMITS

## FACILITY PERMIT TO OPERATE ADVANCE PAPER BOX CO

### PERMIT TO OPERATE

Permit No. G15638  
A/N 525594

#### Equipment Description:

LITHOGRAPHIC PRINTING SYSTEM CONSISTING OF:

- 1) PRINTING PRESS, MITSUBISHI, MODEL # D3000LX-8, 23' - 0" W. X 71' - 8" L. X 10' - 6" H., EIGHT COLOR, AQUEOUS COATER, 40-INCH WIDE SHEET FED, WITH A CHILLED FOUNTAIN.
- 2) OVEN, AIR MOTION SYSTEMS, INFRA-RED, WITH NINE LAMPS, 36 KW TOTAL, AN AIR CIRCULATION FAN AND AN EXHAUST BLOWER.
- 3) HOT AIR MODULES, TWENTY-SIX LAMPS, 36.4 KW TOTAL.
- 4) UV CURING, AIR MOTION SYSTEMS, WITH EIGHT 16 KW LAMPS AND AN EXHAUST BLOWER.

#### Conditions:

1. OPERATION OF THIS EQUIPMENT SHALL BE CONDUCTED IN ACCORDANCE WITH ALL DATA AND SPECIFICATIONS SUBMITTED WITH THE APPLICATION UNDER WHICH THIS PERMIT IS ISSUED UNLESS OTHERWISE NOTED BELOW.  
[RULE 204]
2. THIS EQUIPMENT SHALL BE PROPERLY MAINTAINED AND KEPT IN GOOD OPERATING CONDITION AT ALL TIMES.  
[RULE 204]
3. THE VOC CONTENT OF THE FOUNTAIN SOLUTION USED IN THIS EQUIPMENT SHALL NOT EXCEED 0.30 POUND PER GALLON OF MATERIAL, AS APPLIED, INCLUDING WATER AND EXEMPT COMPOUNDS.  
[RULE 1303(a)(1)-BACT]
4. THE MATERIALS USED IN THIS EQUIPMENT SHALL NOT CONTAIN ANY TOXIC AIR CONTAMINANTS IDENTIFIED IN RULE 1401, TABLE 1 WITH AN EFFECTIVE DATE OF SEPTEMBER 10, 2010, OR EARLIER WITH THE EXCEPTION OF ACRYLIC ACID (CAS # 79-10-7), AMMONIA (CAS # 7664-41-7), COBALT (CAS # 7440-48-4), COPPER & COPPER COMPOUNDS (CAS # 7440-50-8), ETHYLENE GLYCOL MONOBUTYL ETHER (CAS # 111-76-2), ETHYLENE GLYCOL (CAS # 107-21-1), FORMALDEHYDE (CAS # 50-00-0), HYDROCHLORIC ACID (CAS# 7647-01-0), ISOPROPYL ALCOHOL (CAS # 67-63-0), MANGANESE & MANGANESE COMPOUNDS (CAS # 7439-96-5), NAPHTHALENE (CAS # 91-20-3), PHOSPHORIC ACID (CAS # 7664-38-2), SODIUM HYDROXIDE (CAS # 1310-73-2), STYRENE (CAS # 100-42-5), TOLUENE (CAS # 108-88-3), XYLENE (CAS # 1330-20-7), XYLENE (O) (CAS # 95-47-6) XYLENE (M) (CAS # 108-38-3) AND ZINC COMPOUNDS (CAS # 7440-66-6).  
[RULE 1401]

## FACILITY PERMIT TO OPERATE ADVANCE PAPER BOX CO

5. THE TOTAL QUANTITY OF VOC EMISSIONS DISCHARGED TO THE ATMOSPHERE FROM THIS EQUIPMENT SHALL NOT EXCEED 900 POUNDS IN ANY ONE CALENDAR MONTH.  
[RULE 1303(a)(1)-BACT, 1303(b)(2)-OFFSET]
  
6. THE EMISSIONS OF CARCINOGENIC TOXIC AIR CONTAMINANTS FROM THIS EQUIPMENT SHALL NOT EXCEED THE FOLLOWING IN ANY ONE CALENDAR YEAR.  

FORMALDEHYDE	3 POUNDS
NAPHTHALENE	1 POUND

[RULE 1401]
  
7. THE OPERATOR SHALL KEEP ADEQUATE RECORDS FOR THIS EQUIPMENT TO VERIFY THE FOLLOWING:
  - A. DENSITY OF EACH INK IN POUNDS PER GALLONS.
  - B. PERCENTAGE BY WEIGHT OF LITHOGRAPHIC OILS IN EACH INK.
  - C. INK ABSORPTION FACTOR AS SPECIFIED BY CURRENT DISTRICT GUIDELINES.
  - D. VOC CONTENT, FORMALDEHYDE AND NAPHTHALENE CONTENT OF FOUNTAIN SOLUTIONS, WASH MATERIALS, AND OTHER MATERIALS USED IN POUNDS PER GALLON AS APPLIED (INCLUDING WATER AND EXEMPT COMPOUNDS).
  - E. VOC EMISSIONS IN LBS/DAY FROM THIS EQUIPMENT.
  - F. FORMALDEHYDE AND NAPHTHALENE EMISSIONS IN POUNDS PER DAY.
  - G. OTHER DATA AS REQUIRED TO VERIFY THE COMPLIANCE WITH CONDITIONS SPECIFIED IN THIS PERMIT.  
[RULE 109, 1303(b)(2)-OFFSET]
  
8. WITHIN 14 CALENDAR DAYS AFTER THE END OF EACH MONTH, THE OPERATOR SHALL TOTAL AND RECORD VOC, FORMALDEHYDE AND NAPHTHALENE EMISSIONS FOR THE MONTH FROM THE EQUIPMENT. THE RECORD SHALL INCLUDE ANY PROCEDURES USED TO ACCOUNT FOR CONTROL DEVICE EFFICIENCIES AND/OR WASTE DISPOSAL. IT SHALL BE SIGNED AND CERTIFIED FOR ACCURACY BY THE HIGHEST RANKING INDIVIDUAL RESPONSIBLE FOR COMPLIANCE WITH DISTRICT RULES.  
[RULE 109, 1303(b)(2)-OFFSET]
  
9. THE OPERATOR SHALL MAINTAIN A SINGLE LIST WHICH INCLUDES ONLY THE NAME AND ADDRESS OF EACH PERSON FROM WHOM THE FACILITY ACQUIRED VOC-CONTAINING MATERIALS REGULATED BY THE DISTRICT THAT WERE USED OR STORED AT THE FACILITY DURING THE PRECEDING 12 MONTHS.  
[RULE 109, 1303(b)(2)-OFFSET]
  
10. THE OPERATOR SHALL RETAIN ALL PURCHASE INVOICES FOR ALL VOC-CONTAINING MATERIAL USED OR STORED AT THE FACILITY, AND ALL WASTE MANIFESTS FOR ALL WASTE VOC-CONTAINING MATERIAL REMOVED FROM THE FACILITY.  
[RULE 109, 1303(b)(2)-OFFSET]

## **FACILITY PERMIT TO OPERATE ADVANCE PAPER BOX CO**

### **Emissions and Requirements:**

11. THIS EQUIPMENT IS SUBJECT TO THE APPLICABLE REQUIREMENTS OF THE FOLLOWING RULES AND REGULATIONS:

VOC: RULE 109

VOC: RULE 1130, SEE APPENDIX B FOR EMISSION LIMITS

VOC: RULE 1171, SEE APPENDIX B FOR EMISSION LIMITS

## FACILITY PERMIT TO OPERATE ADVANCE PAPER BOX CO

### PERMIT TO CONSTRUCT

A/N 578941  
Granted as of

#### Equipment Description:

IDENTICAL REPLACEMENT OF PO G15637 (A/N 525593) BY THE NEW CONSTRUCTION OF:

LITHOGRAPHIC PRINTING SYSTEM CONSISTING OF:

- 1) PRINTING PRESS, KBD RAPIDA, MODEL NO. 145, SERIAL NO. 370362, SEVEN COLORS, PLUS TWO COATERS AND TWO STUB UNITS, 57-INCH WIDE SHEET-FED, AND 214.4-H.P. TOTAL DRIVE.
- 2) INFRARED INTERDECK DRYERS, TOTAL 201.6 KW.
- 3) INFRARED DELIVERY DRYERS, TOTAL 124.8 KW.
- 4) UV DRYERS, TOTAL 195.53 KW.

#### Conditions:

1. OPERATION OF THIS EQUIPMENT SHALL BE CONDUCTED IN ACCORDANCE WITH ALL DATA AND SPECIFICATIONS SUBMITTED WITH THE APPLICATION UNDER WHICH THIS PERMIT IS ISSUED UNLESS OTHERWISE NOTED BELOW.  
[RULE 204]
2. THIS EQUIPMENT SHALL BE PROPERLY MAINTAINED AND KEPT IN GOOD OPERATING CONDITION AT ALL TIMES.  
[RULE 204]
3. THE TOTAL QUANTITY OF VOC EMISSIONS DISCHARGED TO THE ATMOSPHERE FROM THIS EQUIPMENT SHALL NOT EXCEED 900 POUNDS IN ANY ONE CALENDAR MONTH.  
[RULE 1303(a)(1)-BACT, 1303(b)(2)-OFFSET]

## FACILITY PERMIT TO OPERATE ADVANCE PAPER BOX CO

4. THE MATERIALS USED IN THIS EQUIPMENT SHALL NOT CONTAIN ANY TOXIC AIR CONTAMINANTS IDENTIFIED IN RULE 1401, TABLE 1 WITH AN EFFECTIVE DATE OF JUNE 5, 2015, OR EARLIER WITH THE EXCEPTION OF ACRYLIC ACID (CAS # 79-10-7), AMMONIA (CAS # 7664-41-7), COBALT (CAS # 7440-48-4), COPPER & COPPER COMPOUNDS (CAS # 7440-50-8), DIETHANOLAMINE (CAS # 111-42-2), ETHYLENE GLYCOL MONOBUTYL ETHER (CAS # 111-76-2), ETHYLENE GLYCOL (CAS # 107-21-1), FORMALDEHYDE (CAS # 50-00-0), HYDROCHLORIC ACID (CAS# 7647-01-0), ISOPROPYL ALCOHOL (CAS # 67-63-0), MANGANESE & MANGANESE COMPOUNDS (CAS # 7439-96-5), NAPHTHALENE (CAS # 91-20-3), PHENOL (CAS # 108-95-2), PHOSPHORIC ACID (CAS # 7664-38-2), SODIUM HYDROXIDE (CAS # 1310-73-2), STYRENE (CAS # 100-42-5), TOLUENE (CAS # 108-88-3), XYLENE (CAS # 1330-20-7), XYLENE (O) (CAS # 95-47-6) XYLENE (M) (CAS # 108-38-3) AND ZINC COMPOUNDS (CAS # 7440-66-6).  
[RULE 1401]
5. THE FOUNTAIN SOLUTION USED IN THIS EQUIPMENT SHALL NOT CONTAIN MORE THAN 8% BY VOLUME OF VOC, AS APPLIED, INCLUDING WATER AND EXEMPT COMPOUNDS.  
[RULE 1303(a)(1)-BACT]
6. THE BLANKET AND ROLLER WASHES USED IN THIS EQUIPMENT SHALL NOT HAVE COMPOSITE VAPOR PRESSURE OF THE VOC EXCEEDING 5 mmHg @ 20 DEGREES CENTIGRADE, OR VOC CONTENT EXCEEDING 100 GRAMS PER LITER.  
[RULE 1303(a)(1)-BACT]
7. THE EMISSIONS OF CARCINOGENIC TOXIC AIR CONTAMINANTS FROM THIS EQUIPMENT SHALL NOT EXCEED THE FOLLOWING IN ANY ONE CALENDAR YEAR.  

FORMALDEHYDE	3 POUNDS
NAPHTHALENE	1 POUND

  
[RULE 1401]
8. THE OPERATOR SHALL KEEP ADEQUATE RECORDS FOR THIS EQUIPMENT TO VERIFY THE FOLLOWING:
  - A. DENSITY OF EACH INK IN POUNDS PER GALLONS.
  - B. PERCENTAGE BY WEIGHT OF LITHOGRAPHIC OILS IN EACH INK.
  - C. INK ABSORPTION FACTOR AS SPECIFIED BY CURRENT DISTRICT GUIDELINES.
  - D. VOC CONTENT, FORMALDEHYDE AND NAPHTHALENE CONTENT OF FOUNTAIN SOLUTIONS, WASH MATERIALS, AND OTHER MATERIALS USED IN POUNDS PER GALLON AS APPLIED (INCLUDING WATER AND EXEMPT COMPOUNDS).
  - E. VOC EMISSIONS IN LBS/DAY FROM THIS EQUIPMENT.
  - F. FORMALDEHYDE AND NAPHTHALENE EMISSIONS IN POUNDS PER DAY.
  - G. OTHER DATA AS REQUIRED TO VERIFY THE COMPLIANCE WITH CONDITIONS SPECIFIED IN THIS PERMIT.  
[RULE 109, 1303(b)(2)-OFFSET]

## FACILITY PERMIT TO OPERATE ADVANCE PAPER BOX CO

9. VOC EMISSIONS FROM UV CURABLE MATERIALS SHALL INCLUDE THE VOC EMISSIONS FROM THE FREE SOLVENT (COALESCING SOLVENT), IF ANY, AND THE VOC EMISSIONS FROM THE UV CURABLE FRACTION OF THE MATERIAL. THE VOC EMISSIONS SHALL BE CALCULATED USING THE APPROPRIATE VOC EMISSION FACTOR DETERMINED PURSUANT TO DISTRICT APPROVED TEST METHOD(S). IF NO LABORATORY TESTED EMISSION FACTOR IS AVAILABLE, THE VOC EMISSION FACTOR (IN POUNDS VOC PER GALLON) SHALL BE CALCULATED AS THE SUM OF THE FOLLOWING:
- A. THE WEIGHT OF VOC EMITTED FROM THE FREE SOLVENT IN POUNDS VOC PER GALLON OF MATERIAL, AND
  - B. THE WEIGHT OF VOC EMITTED FROM THE UV CURABLE FRACTION IN THE MATERIAL CALCULATED AS FOLLOWS:  
 $(0.02 \text{ LB VOC/LB}) \times (\text{WEIGHT \% UV CURABLE FRACTION, LB/LB}) \times (\text{DENSITY OF MATERIAL, LB/GAL})$   
[RULE 109, 1303(b)(2)-OFFSET]
10. WITHIN 14 CALENDAR DAYS AFTER THE END OF EACH MONTH, THE OPERATOR SHALL TOTAL AND RECORD VOC, FORMALDEHYDE AND NAPHTHALENE EMISSIONS FOR THE MONTH FROM THE EQUIPMENT. THE RECORD SHALL INCLUDE ANY PROCEDURES USED TO ACCOUNT FOR CONTROL DEVICE EFFICIENCIES AND/OR WASTE DISPOSAL. IT SHALL BE SIGNED AND CERTIFIED FOR ACCURACY BY THE HIGHEST RANKING INDIVIDUAL RESPONSIBLE FOR COMPLIANCE WITH DISTRICT RULES.  
[RULE 109, 1303(b)(2)-OFFSET]
11. THE OPERATOR SHALL MAINTAIN A SINGLE LIST WHICH INCLUDES ONLY THE NAME AND ADDRESS OF EACH PERSON FROM WHOM THE FACILITY ACQUIRED VOC-CONTAINING MATERIALS REGULATED BY THE DISTRICT THAT WERE USED OR STORED AT THE FACILITY DURING THE PRECEDING 12 MONTHS.  
[RULE 109, 1303(b)(2)-OFFSET]
11. THE OPERATOR SHALL RETAIN ALL PURCHASE INVOICES FOR ALL VOC-CONTAINING MATERIAL USED OR STORED AT THE FACILITY, AND ALL WASTE MANIFESTS FOR ALL WASTE VOC-CONTAINING MATERIAL REMOVED FROM THE FACILITY.  
[RULE 109, 1303(b)(2)-OFFSET]

### **Emissions and Requirements:**

12. THIS EQUIPMENT IS SUBJECT TO THE APPLICABLE REQUIREMENTS OF THE FOLLOWING RULES AND REGULATIONS:
- VOC: RULE 109
  - VOC: RULE 1130, SEE APPENDIX B FOR EMISSION LIMITS
  - VOC: RULE 1171, SEE APPENDIX B FOR EMISSION LIMITS

## FACILITY PERMIT TO OPERATE ADVANCE PAPER BOX CO

### RULE 219 EQUIPMENT

**Equipment Description:**

RULE 219 EXEMPT EQUIPMENT, COATING EQUIPMENT, PORTABLE, ARCHITECTURAL COATINGS.

**Periodic Monitoring:**

1. THE OPERATOR SHALL KEEP RECORDS, IN A MANNER APPROVED BY THE DISTRICT, FOR THE FOLLOWING PARAMETER(S) OR ITEM(S):

FOR ARCHITECTURAL APPLICATIONS WHERE NO THINNERS, REDUCERS, OR OTHER VOC CONTAINING MATERIALS ARE ADDED, MAINTAIN SEMI-ANNUAL RECORDS OF ALL COATINGS CONSISTING OF (a) COATING TYPE, (b) VOC CONTENT AS SUPPLIED IN GRAMS PER LITER (g/l) OF MATERIALS FOR LOW-SOLIDS COATINGS, (c) VOC CONTENT AS SUPPLIED IN g/l OF COATING, LESS WATER AND EXEMPT SOLVENT, FOR OTHER COATING.

FOR OTHER ARCHITECTURAL APPLICATIONS WHERE THINNERS, REDUCERS, OR OTHER VOC CONTAINING MATERIALS ARE ADDED, MAINTAIN DAILY RECORDS FOR EACH COATING CONSISTING OF (a) COATING TYPE, (b) VOC CONTENT AS APPLIED IN GRAMS PER LITER (g/l) OF MATERIALS USED FOR LOW-SOLIDS COATINGS, (c) VOC CONTENT AS APPLIED IN g/l OF COATING, LESS WATER AND EXEMPT SOLVENT, FOR OTHER COATING.

[RULE 3004 (a) (4)]

**Emissions And Requirements:**

2. THIS EQUIPMENT IS SUBJECT TO THE APPLICABLE REQUIREMENTS OF THE FOLLOWING RULES AND REGULATION:

VOC: RULE 1113, SEE APPENDIX B FOR EMISSION LIMITS  
VOC: RULE 1171, SEE APPENDIX B FOR EMISSION LIMITS

**FACILITY PERMIT TO OPERATE  
ADVANCE PAPER BOX CO**

**RULE 219 EQUIPMENT**

**Equipment Description:**

RULE 219 EXEMPT EQUIPMENT, AIR CONDITIONING UNITS

**Emissions And Requirements:**

1. THIS EQUIPMENT IS SUBJECT TO THE APPLICABLE REQUIREMENTS OF THE FOLLOWING RULES AND REGULATIONS:

REFRIGERANT: RULE 1415  
REFRIGERANT: 40CFR 82 SUBART F

## **FACILITY PERMIT TO OPERATE ADVANCE PAPER BOX CO**

### **RULE 219 EQUIPMENT**

#### **Equipment Description:**

RULE 219 EXEMPT EQUIPMENT, PRINTING EQUIPMENT, LOW USE OR EMISSIONS, WITH RELATED COATING, LAMINATING AND DRYING EQUIPMENT.

#### **Emissions And Requirements:**

1. THIS EQUIPMENT IS SUBJECT TO THE APPLICABLE REQUIREMENTS OF THE FOLLOWING RULES AND REGULATIONS:  
VOC: RULE 1130, SEE APPENDIX B FOR EMISSION LIMITS  
VOC: RULE 1171, SEE APPENDIX B FOR EMISSION LIMITS

**FACILITY PERMIT TO OPERATE  
ADVANCE PAPER BOX CO**

**RULE 219 EQUIPMENT**

**Equipment Description:**

RULE 219 EXEMPT EQUIPMENT, GLUING MACHINES, LOW USE OR EMISSIONS

**Emissions And Requirements:**

1. THIS EQUIPMENT IS SUBJECT TO THE APPLICABLE REQUIREMENTS OF THE FOLLOWING RULES AND REGULATIONS:

VOC: RULE 1168, SEE APPENDIX B FOR EMISSION LIMITS

VOC: RULE 1171, SEE APPENDIX B FOR EMISSION LIMITS

## **FACILITY PERMIT TO OPERATE ADVANCE PAPER BOX CO**

### **RULE 219 EQUIPMENT**

**Equipment Description:**

RULE 219 EXEMPT EQUIPMENT, HAND WIPING OPERATIONS.

**Emissions And Requirements:**

1. THIS EQUIPMENT IS SUBJECT TO THE APPLICABLE REQUIREMENTS OF THE FOLLOWING RULES AND REGULATION:

VOC: RULE 1171, SEE APPENDIX B FOR EMISSION LIMITS