



**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
ENGINEERING AND COMPLIANCE DIVISION**

Coating, Printing, Aerospace & Metal Finishing Team

PERMIT APPLICATION EVALUATION

Page 1 of 6
A/Ns 490182 & 501988

Processed by WW
Reviewed by SMKE
Date 4/28/11

PERMIT TO OPERATE

Flexographic Heat-set Press (PC to PO) & cancel

Applicant's Name: *Graphic Packaging International, Inc*
Facility ID: 157259
Mailing Address: 1600 Barranca Pky, Irvine, CA 92606
Equipment Address: 1600 Barranca Pky, Irvine, CA 92606

EQUIPMENT DESCRIPTION

A/N (521383) - Title V permit revision

Deminimis significant and Administrative permit revision

A/N 490182 (NEW) replacement of A/N 490168 (PO # G3374)- Cancel (P/C issued not installed)

FLEXOGRAPHIC PRINTING SYSTEM CONSISTING OF:

1. *FLEXOGRAPHIC PRINTING PRESS, ROBINETTE, MODEL 1066, ONE COLOR, 66" WIDTH, WEB FED.*
2. *DRYER, WITH A 1,500,000 BTU PER HOUR NATURAL GAS FIRED ECLIPSE MINNOX LOW NO_x BURNER, AND ONE 10 HP EXHAUST FAN.*

A/N 501988 (NEW) replacement of A/N 490172 (PO # G3377)- P/C to P/O

WINDER JOGGER, WOODWARD, MODEL NO. 550, 7'-0" W. X 14'-7" L. X 9'-7" H., WITH ONE 5 H.P. HYDRAULIC PUMP AND 15-H.P. BLOWER, VENTED TO A DUST COLLECTOR.

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.
2. THIS EQUIPMENT SHALL BE PROPERLY MAINTAINED AND KEPT IN GOOD OPERATING CONDITION AT ALL TIMES.
3. THIS EQUIPMENT SHALL NOT BE OPERATED UNLESS IT IS VENTED TO AIR POLLUTION CONTROL EQUIPMENT, WHICH IS IN FULL USE AND WHICH HAS BEEN ISSUED A VALID PERMIT BY THE EXECUTIVE OFFICER.



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BACKGROUND

Graphic Packaging International (GPI) submitted three applications on 10/17/08 to install two lithographic printing presses and one flexographic heat-set press. Permits to Construct were issued for the two lithographic printing presses on June 12, 2009. The permit evaluation for this flexographic heat-set press (A/N 490185) was done separately due to the permit moratorium. This application was to replace an existing flexographic heat press with an active permit no. G3374, A/N 490168. Combustion emissions from the low-NOx burner are well below the exemption levels identified in Rule 1304(d). Permit to Construct was issued to the flexo press on 1/1/2010 but it was not installed (see consultant's comments dated 12/6/10 and inspector's report dated 7/13/10) therefore this application will be canceled.

GPI submitted an application for a new winder jogger (A/N 501988) replacing their old winder jogger with an active permit #G3377 (A/N 490172). This equipment is vented to a permitted baghouse (A/N 490177, P/O G3379). Permit to Construct was issued 1/1/2010. The equipment has been installed and is operating per permit requirements therefore permit to operate will now be issued.

The facility is operating under a facility-wide VOC emission limit of 2,165 pounds per day. The winder jogger was a replacement therefore there was no emission increases at the facility.

GPI is a Title V facility. There was a change of operator for all the permitted equipment under the previous operator, Bluegrass Folding Carton (ID 148535). The Title V facility permit for Bluegrass Folding Carton (previous owner) was issued on 10-11-06, which was for change of operator from Smurfit-Stone Container (ID 007089). Smurfit-Stone Container was issued their Title V renewal permit on 6-18-06. The Title V permit for change of operator from Smurfit Stone to GPI was issued on June 12, 2009. This is the fourth revision since the TV renewal issued to Smurfit-Stone Container. This is an administrative permit revision to convert P/C to P/O for the winder jogger, remove the P/C for flexo press under A/N 490168 and remove P/O for old winder jogger under A/N 490172 (G3377). Also included in this administrative revision is changing the responsible official, converting P/C to P/O for a litho press, remove P/C for a litho press (not installed) and remove P/O for 2 flexo presses. This revision will be included with the de minimus significant revision under A/N 521383 to add a new flexo press and change of condition on 3 litho presses.



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PROCESS DESCRIPTION

GPI specializes in the production of packaging boxes for various commercial products. The majority of the boxes are made with soft cardboard stock with graphics printed externally by the lithographic printing presses. Labels for the boxes are printed on the flexographic printing presses. In the folding carton manufacturing process, sheets are directed to the printing systems through rollers, where images are applied using different low-VOC printing inks. The printing systems imparts necessary images per customer requests, The dry starch is applied on the printed sides in enclosed compartments so that the sheets do not stick to each other, the stack of printed sheets is placed on the winder-jogger for realignment prior to cutting.

EMISSION CALCULATIONS

The winder jogger has the same emissions as the replaced equipment therefore there was no emission increase. The facility is operating under a facility-wide VOC emission limit of 2,165 pounds per day.

Winder jogger PM₁₀ emissions are taken from previous applications.

R1= 1.96 lb/hr

R2= 0.1 lb/hr, 2.4 lb/dy

30 day ave = 2 lb/dy

RULE EVALUATION

RULE 212(c)(1) *This section requires a public notice for all new and modified permit units that may emit air contaminants located within 1,000 feet from the outer boundary of a school.*

Since there are no schools within 1,000 feet of the facility, a public notice will not be required by this section.

RULE 212(c)(2) *This section requires a public notice for all new and modified facilities which have on-site emission increases exceeding any of the daily maximums specified in subdivision (g).*

This is a replacement unit. There will be no emission increase from this facility due to this project. Public notice will not be required by this section.

LB/DAY	CO	NO _x	PM ₁₀	ROG	LEAD	SO _x
Max Limit	220	40	30	30	3	60
Increases	0	0	0	0	0	0



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RULE 212(c)(3) *This section requires a public notice for all new or modified permit units with increases in emissions of toxic air contaminants listed in Table I of Rule 1401 resulting in MICR greater than $1E^{-6}$ per permit unit or greater than $10E^{-6}$ per facility.*

This is a replacement unit with no emission increase and no TAC. The proposed project is expected to comply with all applicable R1401 requirements. Public notice will not be required per this section.

RULE 212(g) *This section requires a public notice for all new and modified sources that have equipment emission increases exceeding any of the daily maximums as specified by Rule 212 (g).*

This is a replacement unit with no increase in emissions. Public notice will not be required by this section.

	<u>ROG</u>	<u>NO_x</u>	<u>PM₁₀</u>	<u>SO₂</u>	<u>CO</u>	<u>Pb</u>
Equipment max emissions	0	0	0	0	0	0
MAX MDC Limit (lb/day)	30	40	30	60	220	3
Required Public Notice	No	No	No	No	No	No

RULE 401 Visible Emissions

Visible emissions are not expected with proper maintenance and operation of this equipment. The system shows no visible emissions complaints at this location for the old winder jogger.

RULE 402 Nuisance

Operation of this equipment is not expected to create complaints or nuisance with proper maintenance and operation. The system shows no nuisance complaints at this location for the old winder jogger.

REG XIII Rule 1303(a), Best Available Control Technology (BACT)

BACT is met by venting the winder jogger to a baghouse.

Rule 1303 (b)(1), Modeling & 1303(c)(1) - Offsets

This is a functionally identical replacement with no increase in emissions. It is exempt from modeling and offsets under Rule 1304(a)(1).



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RULE 1401 New Source Review of Toxic air Contaminants

There is no emission increase due to this replacement and no TACs.

REG XXX

This equipment was previously issued a Permit to Construct and was included in the Title V facility permit. Since the equipment replacement is completed, a Permit to Operate is recommended for the winder-jogger. Pursuant to Rule 3000(b)(1)(D), issuance of a final Permit to Operate for equipment previously issued a Title V Permit to Construct is considered as an administrative Title V Permit Revision. This is the 4th revision since the Title V renewal was issued on June 18, 2006. As part of this revision, the permit for the replaced winder-jogger under A/N 490172 and the P/C for the flexo press under A/N 490182 will be removed from Section D as this equipment is not in operation at this facility. In addition, this revision will be included with the administrative permit revision to convert a litho press (A/N 490184) from P/C to P/O, remove a P/C for a litho press under A/N 490185 that was not installed, and remove two flexo presses under A/N 490168, P/O G3374 and A/N 490171, P/O G3376 that were removed from service. These administrative revisions will also be included with the de minimis significant permit revision under A/N 521383 to install a new flexo press under A/N 521382, and change permit conditions on three litho presses (A/Ns 521762-64).

Revisions since Renewal	HAP	VOC	NOx	PM₁₀	SOx	CO
(1 st) Revision - (administrative): change of operator from Smurfit-Stone Container (ID# 007089) to Bluegrass Folding Carton (ID# 148535) issued 10/11/06 (Revision 0).	0	0	0	0	0	0
(2 nd) Revision - (administrative): change of operator from Bluegrass Folding Carton (ID 148535) to Graphic Packaging Int'l (ID 157259) & -(de minimis significant) add two lithographic printing presses (Revision 0)	0	0	0	0	0	0
(3rd) Revision - (de minimis significant) add flexographic heat-set printing press (A/N 490182) to replace A/N 490168 in future. Add winder jogger A/N 501988 to replace A/N 490172 in future -P/Cs. Also remove paperboard scrap collection and baling system under permit P/O G3375 (A/N 490170) since it is now exempt from written permit under Rule 219(p)(10)	0	0	0	0	0	0
4th) Revision - De minimis Significant: Add new flexographic heat-set printing press (A/N 521382) and change of condition on three litho presses (A/Ns 521762-64). Administrative: convert P/Cs for a litho press (A/N 490184) and winder jogger (A/N 501988) to P/O; cancel P/Cs for one flexo press (A/N 490182) and one litho press (A/N 490185) and remove from Section D; remove winder jogger under A/N 490172, P/O G3377 (replaced by winder jogger A/N 501988); and remove two flexo presses under A/N 490168, P/O G3374 and A/N 490171, P/O G3376 (removed from service) from Section D.	0	0	1	0	0	1
Cumulative Total since Renewal (6-18-06)	0	0	1	0	0	1
Maximum Daily Limit	30	30	40	30	60	220



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RECOMMENDATION

The proposed project is expected to comply with all applicable District Rules and Regulations. Since the proposed project is considered as an “administrative permit revision”, it is exempt from the public participation requirements under Rule 3006 (b). However since this is included with the de minimis significant revision, 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 have any objections within the review period, a revised Title V permit will be issued to this facility with a Permit to Operate for winder jogger, removal of the P/C for the flexo press under A/N 490182 and all other changes described in Reg XXX.