



Mr. Steven Sylvester
G-3 Enterprises - Label Division
2612 Crows Landing Road
Modesto, CA 95358

Re: Notice of Minor Title V Permit Modification
District Facility # N-3309
Project # N-1142853

Dear Mr. Sylvester:

Enclosed is the District's analysis of your application for a minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued N-3309-25-0 into the Title V operating permit. The modification was to install a printing press.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued N-3309-25-0, emission increases, application, and previous Title V permit. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

If you have any questions, please contact Mr. Nick Peirce, Permit Services Manager, at (209) 557-6400.

Thank you for your cooperation in this matter.

Sincerely,



Arnaud Marjollet
Director of Permit Services

Enclosures

cc: Gerardo C. Rios, EPA (w/enclosure) via email

Seyed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: 661-392-5500 FAX: 661-392-5585

TITLE V APPLICATION REVIEW

Minor Modification
Project #: N-1142853

Engineer: Mark Schonhoff
Date: September 24, 2014

Facility Number: N-3309
Facility Name: G-3 Enterprises - Label Division
Mailing Address: 2612 Crows Landing Road
Modesto, CA 95358

Contact Name: Steven Sylvester
Phone: (209) 341-6804

Responsible Official: John Kalal
Title: Vice President, Manufacturing

I. PROPOSAL

G-3 Enterprises is proposing a Minor Modification to their Title V permit to incorporate Authority to Construct Permit (ATC) N-3309-25-0 into the current Title V permit. The ATC authorizes the installation of a printing press. The ATC was issued without a Certificate of Conformity because the facility Title V permit had not yet been issued, therefore, a Title V modification was logged in under N-3309-25-1. The applicant provided VOC offsets sufficient to mitigate the entire potential to emit of the unit.

The purpose of this evaluation is to identify all applicable requirements, determine if the facility will comply with the applicable requirements and to provide the legal and factual basis for the proposed revisions.

II. FACILITY LOCATION

2612 Crows Landing Road
Modesto, CA

III. EQUIPMENT DESCRIPTION

N-3309-25-0

GRAPHIC ARTS PRINTING OPERATION SERVED BY A NILPETER FA-4 11-COLOR FLEXOGRAPHIC TYPE PRINTING PRESS AND A UV CURING STATION

IV. SCOPE OF EPA AND PUBLIC REVIEW

This change to the Title V permit is considered to be a Minor Modification and, as such, requires no public review.

V. APPLICABLE REQUIREMENTS

District Rule 2520, Federally Mandated Operating Permits (Adopted June 21, 2001)

VI. DESCRIPTION OF PROPOSED MODIFICATIONS

G-3 Enterprises received ATC N-3309-25-0, which authorizes the installation of a printing press. G-3 Enterprises is now proposing to incorporate the ATC into the facility Title V permit.

VII. COMPLIANCE

In accordance with Rule 2520, 3.20, these modifications:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;
3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include;

- a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
 - b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; and
5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
 6. Do not seek to consolidate overlapping applicable requirements.

In accordance with Rule 2520, the application meets the procedural requirements of section 11.4 by including;

1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
2. The source's suggested draft permit; and
3. Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used.

VIII. ATTACHMENTS

- A. Draft Title V Operating Permit N-3309-25-1
- B. Authority to Construct Permit N-3309-25-0
- C. Emissions Increases
- D. Application

ATTACHMENT A

Proposed Modified Title V Operating Permit
N-3309-25-1

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-3309-25-1

EXPIRATION DATE: 10/31/2019

EQUIPMENT DESCRIPTION:

GRAPHIC ARTS PRINTING OPERATION SERVED BY A NILPETER FA-4 11-COLOR FLEXOGRAPHIC TYPE PRINTING PRESS AND A UV CURING STATION

PERMIT UNIT REQUIREMENTS

1. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. Only UV curable inks and coatings shall be utilized. The VOC content of the inks utilized shall not exceed 0.031 lb/gal (less water and exempt compounds) and the VOC content of the coatings utilized shall not exceed 0.07 lb/gal (less water and exempt compounds). [District Rules 2201 and 4607] Federally Enforceable Through Title V Permit
3. The VOC content of solvents utilized shall comply with table 7 of District Rule 4607. For a permittee using any solvent containing more than 25 g/L of VOC for organic solvent cleaning, cleaning activities shall be by one of the following methods: (1) wipe cleaning; or (2) application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force; or (3) non-atomized solvent flow method in which the cleaning solvent is collected in a container or a collection system that is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container; or (4) solvent flushing method in which the cleaning solvent is discharged into a container that 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. [District Rule 4607] Federally Enforceable Through Title V Permit
4. VOC emissions from this unit shall not exceed 10.0 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The operator shall store and dispose of fresh solvents, spent solvents, waste solvent cleaning materials, coatings, adhesives, catalysts, thinners, and inks in closed, non-absorbent, non-leaking containers. The containers shall remain closed at all times except when depositing or removing their contents or when they are empty. [District Rules 2201 and 4607] Federally Enforceable Through Title V Permit
6. The operator shall utilize all graphic arts materials and graphic arts material application equipment in accordance with their manufacturer's instructions. [District Rule 4607] Federally Enforceable Through Title V Permit
7. The operator shall maintain a file that includes a material safety data sheet or product data sheet showing the material name, the manufacturer's name, the VOC content as applied, the specific mixing instructions and the density of each ink, coating and solvent in use. [District Rules 2201 and 4607] Federally Enforceable Through Title V Permit
8. The operator shall record, on a monthly basis, the quantity, the VOC content and the density of each ink, coating and solvent used. Separate records shall be kept for pantone and non-pantone inks. [District Rules 2201 and 4607] Federally Enforceable Through Title V Permit
9. The operator shall keep a daily record of the VOC emissions from this unit. [District Rule 2201] Federally Enforceable Through Title V Permit
10. All records shall be retained for a period of at least 5 years and shall be made available to APCO, ARB and EPA upon request. [District Rules 2201 and 4607] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

ATTACHMENT B

Authority to Construct Permit
N-3309-25-0



COPY

AUTHORITY TO CONSTRUCT

PERMIT NO N-3309-25 0

ISSUANCE DATE 12/02/2013

LEGAL OWNER OR OPERATOR G-3 ENTERPRISES LABEL DIVISION
MAILING ADDRESS 2612 CROWS LANDING RD
MODESTO CA 95358 9400

LOCATION 2612 CROWS LANDING RD
MODESTO CA 95358 9400

EQUIPMENT DESCRIPTION
GRAPHIC ARTS PRINTING OPERATION SERVED BY A NILPETER FA-4 11-COLOR FLEXOGRAPHIC TYPE PRINTING PRESS AND A UV CURING STATION

CONDITIONS

- 1 Prior to operating equipment under this Authority to Construct the permittee shall surrender VOC emission reduction credits for the following quantities of emissions 1st quarter 908 lb 2nd quarter - 909 lb 3rd quarter 909 lb and fourth quarter - 909 lb Offsets shall be provided at the applicable offset ratio specified in Section 4 8 1 of Rule 2201 (as amended 4/21/2011) [District Rule 2201]
- 2 ERC Certificate S 3807 1 or a certificate split from that certificate shall be used to supply the required VOC offsets unless a revised offsetting proposal is received and approved by the District Following the revisions this Authority to Construct permit shall be reissued administratively to specify the new offsetting proposal Original public noticing requirements shall be duplicated prior to the reissuance of this Authority to Construct Permit [District Rule 2201]
- 3 No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as or darker than Ringelmann 1 or 20% opacity [District Rule 4101]
- 4 No air contaminant shall be released into the atmosphere which causes a public nuisance [District Rule 4102]
- 5 Only UV curable inks and coatings shall be utilized The VOC content of the inks utilized shall not exceed 0 031 lb/gal (less water and exempt compounds) and the VOC content of the coatings utilized shall not exceed 0 07 lb/gal (less water and exempt compounds) [District Rules 2201 and 4607]

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557 6400 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT This is NOT a PERMIT TO OPERATE Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans specifications and conditions of this Authority to Construct and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District Unless construction has commenced pursuant to Rule 2050 this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance The applicant is responsible for complying with all laws ordinances and regulations of all other governmental agencies which may pertain to the above equipment

Seyed Sadredin Executive Director / APCD

DAVID WARNER Director of Permit Services

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- 6 The VOC content of solvents utilized shall comply with table 7 of District Rule 4607 For a permittee using any solvent containing more than 25 g/L of VOC for organic solvent cleaning cleaning activities shall be by one of the following methods (1) wipe cleaning or (2) application of solvent from hand held spray bottles from which solvents are dispensed without a propellant-induced force or (3) non atomized solvent flow method in which the cleaning solvent is collected in a container or a collection system that is closed except for solvent collection openings and, if necessary openings to avoid excessive pressure build-up inside the container or (4) solvent flushing method in which the cleaning solvent is discharged into a container that 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 [District Rule 4607]
- 7 VOC emissions from this unit shall not exceed 10 0 pounds during any one day [District Rule 2201]
- 8 The operator shall store and dispose of fresh solvents spent solvents, waste solvent cleaning materials coatings adhesives, catalysts thinners and inks in closed non absorbent, non leaking containers The containers shall remain closed at all times except when depositing or removing their contents or when they are empty [District Rules 2201 and 4607]
- 9 The operator shall utilize all graphic arts materials and graphic arts material application equipment in accordance with their manufacturer's instructions [District Rule 4607]
- 10 The operator shall maintain a file that includes a material safety data sheet or product data sheet showing the material name the manufacturer's name the VOC content as applied the specific mixing instructions and the density of each ink coating and solvent in use [District Rules 2201 and 4607]
- 11 The operator shall record, on a monthly basis, the quantity the VOC content and the density of each ink, coating and solvent used Separate records shall be kept for pantone and non pantone inks [District Rules 2201 and 4607]
- 12 The operator shall keep a daily record of the VOC emissions from this unit [District Rule 2201]
- 13 All records shall be retained for a period of at least 5 years and shall be made available to APCO, ARB and EPA upon request [District Rule 4607]

ATTACHMENT C

Emissions Increases

ATC	SSIPE (lb/yr)				
	NO _x	VOC	CO	SO _x	PM ₁₀
N-3309-25-0	0	3,650	0	0	0
TOTAL	0	3,650	0	0	0

ATTACHMENT D

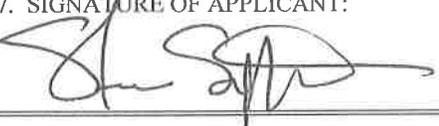
Application

San Joaquin Valley Air Pollution Control District

www.valleyair.org

Permit Application For:

[] ADMINISTRATIVE AMENDMENT [X] MINOR MODIFICATION [] SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: G3 Enterprises – Label Division	
2. MAILING ADDRESS: STREET/P.O. BOX: 2612 Crows Landing Road CITY: Modesto STATE: CA 9-DIGIT ZIP CODE: 95358	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: 2612 Crows Landing Road CITY: Modesto ¼ SECTION _____ TOWNSHIP _____ RANGE _____	INSTALLATION DATE: May 2014
4. GENERAL NATURE OF BUSINESS: Printing of labels	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) Permit N-3309 – 25 – 0 GRAPHIC ARTS PRINTING OPERATION SERVED BY A NILPETER FA-4 11-COLOR FLEXOGRAPHIC TYPE PRINTING PRESS AND A UV CURING STATION	
6. TYPE OR PRINT NAME OF APPLICANT: Steven Sylvester	TITLE OF APPLICANT: Senior Manager - EHS
7. SIGNATURE OF APPLICANT: 	DATE: 8/4/14 PHONE: (209) 341 - 6804 FAX: (209) 236 - 3938 EMAIL: steven.sylvester@g3enterprises.com

For APCD Use Only:

DATE STAMP: RECEIVED AUG 05 2014 SJVAPCD NORTHERN REGION	FILING FEE RECEIVED: \$ 0 CHECK#: _____ DATE PAID: _____ PROJECT NO: N1142853 FACILITY ID: N-3309
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San Joaquin Valley Unified Air Pollution Control District

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

Permit Unit N-3309 - 25

- SIGNIFICANT PERMIT MODIFICATION ADMINISTRATIVE
 MINOR PERMIT MODIFICATION AMENDMENT

COMPANY NAME: G3 Enterprises – Label Division, Modesto, CA	FACILITY ID: N – 3309
1. Type of Organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name: G3 Enterprises, Inc., Modesto, CA	
3. Agent to the Owner: Steven Sylvester	

II. COMPLIANCE CERTIFICATION (Read each statement carefully and initial all circles for confirmation):

- Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).
- Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.
- Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
- Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

I declare, under penalty of perjury under the laws of the state of California, that the foregoing is correct and true:

John Kalal
Signature of Responsible Official

7/25/14
Date

John Kalal

Name of Responsible Official (please print)

Vice President, Manufacturing

Title of Responsible Official (please print)