



FEB 04 2013

Mr. Mike Hauptman  
QG, LLC  
2201 Cooper Ave  
Merced, CA 95348

**Re: Final - Authority to Construct / Certificate of Conformity (Minor Mod)  
Project # N-1122453**

Dear Mr. Hauptman:

The Air Pollution Control Officer has issued Authorities to Construct (N-1646-6-5, '-16-5, '-23-5, '-25-4, '-36-4, '-37-4, '-38-5 and '-39-5) with Certificates of Conformity to QG, LLC. The project would increase the daily VOC emission limits for three of the printing lines and reduce the daily VOC emission limits for five other printing lines.

Enclosed are the Authorities to Construct and invoice. The application and proposal were sent to US EPA Region IX on January 9, 2013. No comments were received following the District's preliminary decision on this project.

Prior to operating with modifications authorized by the Authority to Construct, you must submit an application to modify the Title V permit as an administrative amendment in accordance with District Rule 2520, Section 11.5.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Sincerely,

David Warner  
Director of Permit Services

Enclosures  
gh

**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



FEB 04 2013

Gerardo C. Rios, Chief  
Permits Office  
Air Division  
U.S. EPA - Region IX  
75 Hawthorne St  
San Francisco, CA 94105

**Re: Final - Authority to Construct / Certificate of Conformity (Minor Mod)  
Project # N-1122453**

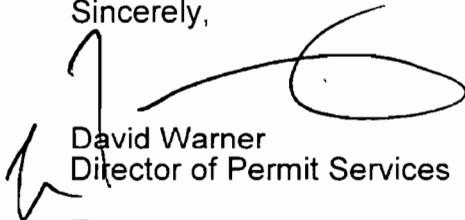
Dear Mr. Rios:

The Air Pollution Control Officer has issued Authorities to Construct (N-1646-6-5, '-16-5, '-23-5, '-25-4, '-36-4, '-37-4, '-38-5 and '-39-5) with Certificates of Conformity to QG, LLC. The project would increase the daily VOC emission limits for three of the printing lines and reduce the daily VOC emission limits for five other printing lines.

Enclosed are copies of the Authorities to Construct. The application and proposal were sent to US EPA Region IX on January 9, 2013. No comments were received following the District's preliminary decision on this project.

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



# AUTHORITY TO CONSTRUCT

**PERMIT NO:** N-1646-6-5

**ISSUANCE DATE:** 01/30/2013

**LEGAL OWNER OR OPERATOR:** QG, LLC  
**MAILING ADDRESS:** N63 W23075 HWY 74  
SUSSEX, WI 53089

**LOCATION:** 2201 COOPER AVE  
MERCED, CA 95348

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF GRAPHIC ARTS PRINTING OPERATION CONSISTING OF ONE HARRIS MODEL 1000B HEATSET OFFSET LITHOGRAPHIC PRINTING PRESS #514 SERVED BY TWO TEC NATURAL GAS FIRED DRYING OVENS (TOTAL OF 1 4 MMBTU/HR) ALL VENTED TO THE 9 5 MMBTU/HR MEG TEC ENTERPRISE II OR 18 MMBTU/HR REECO RETHERM MODEL E REGENERATIVE THERMAL OXIDIZERS DECREASE DAILY VOC LIMIT FROM 69 1 TO 37 5 LB/DAY

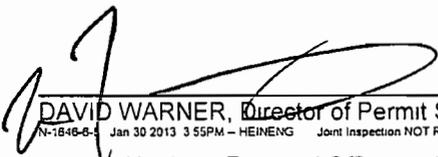
## CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c) [District Rule 2201] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere [District Rule 2201] Federally Enforceable Through Title V Permit
4. The drying ovens and regenerative thermal oxidizers shall be fired exclusively on natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The drying oven serving the heatset offset printing press shall be maintained under negative pressure and shall be vented through the thermal oxidizer at all times except during periods of start-up while the dryer is being air purged. [District Rule 2201] Federally Enforceable Through Title V Permit

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 / APCO



DAVID WARNER, Director of Permit Services  
N-1846-6-5 Jan 30 2013 3:55PM - HEINEING Joint Inspection NOT Required

6. The collection system for the dryer exhaust and for all fugitive VOC emissions shall have a minimum capture efficiency of 90%. [District Rules 2201 and 4607, 5.6] Federally Enforceable Through Title V Permit
7. Each thermal oxidizer shall be operated with a minimum VOC destruction efficiency of 98%. [District Rules 2201 and 4607, 5.6] Federally Enforceable Through Title V Permit
8. Each thermal oxidizer shall be equipped with an operational continuous temperature monitoring and recording instrument. [District , Rules 2201, 2520, 9.3.2, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
9. Each thermal oxidizer shall be operated at a minimum temp. of 1400 deg. F. The incinerator shall be preheated to 1400 deg. F prior to the start-up of the heatset offset printing operation. [District Rules 2201, 2520, 9.3.2, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
10. The VOC content of organic solvents used to perform surface preparation or cleanup shall not exceed the VOC content limits specified in Table 7 of Rule 4607 (Graphic Arts and Paper, Film, Foil, and Fabric Coatings - 12/18/08 version). [District Rule 4607, 5.8.1] Federally Enforceable Through Title V Permit
11. For a permittee using any solvent containing more than 25 g/L (0.21 lb/gal) 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 which 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, 5.8.3] Federally Enforceable Through Title V Permit
12. For a permittee using any solvent containing more than 25 g/L (0.21 lb/gal) of VOC for organic solvent cleaning, solvent shall not be atomized into the open air unless it is vented to a VOC control device. This provision shall not apply to operations where roller or blanket wash is applied automatically and the cleaning of the nozzle tips of automated spray equipment systems, except for robotic systems, and cleaning with nonpropellant-induced, hand-held spray bottles or containers which solvents are dispensed without a propellant-induced force. [District Rule 4607, 5.8.4] Federally Enforceable Through Title V Permit
13. For a permittee using any solvent containing more than 25 g/L (0.21 lb/gal) of VOC for organic solvent cleaning, the permittee shall not use VOC-containing material to clean spray equipment used for the application of coatings, adhesives, or ink, unless an enclosed system or equipment that is proven to be equally effective at controlling emissions is used for cleaning. If an enclosed system is used, it must totally enclose spray guns, cups, nozzles, bowls, and other parts during washing, rinsing, draining procedures, and it must be used according to manufacturer's recommendations and must be closed when not in use. [District Rule 4607, 5.8.5] Federally Enforceable Through Title V Permit
14. Permittee shall store or dispose of fresh or 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 the contents of the containers or when the container is empty. [District Rule 4607, 5.9] Federally Enforceable Through Title V Permit
15. The permittee shall properly use and operate all graphic arts printing technologies as directed and/or specified by the manufacturer of the printer or graphic arts material. [District Rule 4607, 5.10] Federally Enforceable Through Title V Permit
16. The Volatile Organic Compound (VOC) content of the printing inks as applied (excluding water and exempt compounds) shall be less than 45% by weight and the VOC content of the fountain solutions shall be less than 15% by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
17. VOC emissions from the printing inks and solvents shall not exceed 37.5 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
18. NO<sub>x</sub> emissions from the drying oven shall not exceed 4.3 ppmvd @ 19% O<sub>2</sub> (referenced as NO<sub>2</sub>). [District Rule 2201] Federally Enforceable Through Title V Permit

19. CO emissions from the drying oven shall not exceed 25.0 ppmvd @ 19% O<sub>2</sub>. [District Rule 2201] Federally Enforceable Through Title V Permit
20. Emissions from the drying oven shall not exceed any of the following limits: 0.00285 lb-SO<sub>x</sub>/MMBtu, 0.0076 lb-PM<sub>10</sub>/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
21. NO<sub>x</sub> emissions from the regenerative thermal oxidizers shall not exceed 4.3 ppmvd @ 19% O<sub>2</sub> (referenced as NO<sub>2</sub>). [District Rule 2201] Federally Enforceable Through Title V Permit
22. CO emissions from the regenerative thermal oxidizers shall not exceed 25.0 ppmvd @ 19% O<sub>2</sub>. [District Rule 2201] Federally Enforceable Through Title V Permit
23. Emissions from the regenerative thermal oxidizers shall not exceed any of the following limits: 0.00285 lb-SO<sub>x</sub>/MMBtu, 0.0076 lb-PM<sub>10</sub>/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
24. Source testing to demonstrate compliance with the VOC destruction efficiency of each regenerative thermal oxidizer shall be conducted on an annual basis. [District Rule 2201] Federally Enforceable Through Title V Permit
25. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081, 7.1] Federally Enforceable Through Title V Permit
26. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081, 7.3] Federally Enforceable Through Title V Permit
27. Source testing to determine the destruction efficiency of each regenerative thermal oxidizer shall be conducted using EPA Methods 2, 2A, or 2D for measuring flow rates and EPA Methods 25, 25A, or 25C for measuring total gaseous organic concentrations at the inlet and outlet of the control device. [District Rule 4607, 6.4.7] Federally Enforceable Through Title V Permit
28. Permittee shall maintain a current file of coatings, inks, adhesives, fountain solutions, wash primers, and solvents in use and in storage. The file shall include material safety data sheet (MSDS) or product data sheet showing the material name, manufacturer's name, VOC content as applied, mixing instruction, and density. [District Rule 4607, 6.1.1] Federally Enforceable Through Title V Permit
29. The permittee shall record on a daily basis, the type and amount of each coating, adhesive, fountain solution, wash primer, and solvent used. [District Rule 4607, 6.1.3] Federally Enforceable Through Title V Permit
30. The permittee shall record on a monthly basis, the type and amount of all inks used and their VOC content and densities, using one of the methods listed in Rule 4607, Section 6.1.2.1 (12/18/08 version of Rule 4607). [District Rule 4607, 6.1.2.1] Federally Enforceable Through Title V Permit
31. The permittee shall record on a monthly basis, the type and amount of each ink, coating, adhesive, wash primer, and solvent used. [District Rule 4607, 6.1.2.2] Federally Enforceable Through Title V Permit
32. The permittee shall record on a monthly basis, the type, amount and percent VOC by volume of each fountain solution used. [District Rule 4607, 6.1.2.3] Federally Enforceable Through Title V Permit
33. The permittee shall maintain daily records of the following: (1). Quantity of VOC emitted (in pounds) from this printing press; (2). Cumulative quantity of VOC emitted (in pounds) from all graphic arts printing operations at the facility; (3) Quantity of natural gas used (in cubic feet) by each drying oven and each thermal oxidizer at the facility; (4) Operational temperature of the regenerative thermal oxidizer. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
34. All records shall be maintained and retained on-site for a minimum of five years, and shall be made available for District inspection upon request. [District Rules 1070, 2520, and 4607] Federally Enforceable Through Title V Permit
35. Each thermal oxidizer shall be operated at a minimum temp. of 1400 deg. F. Upon determining an excursion from this requirement, the permittee shall investigate the excursion and take corrective action to minimize emissions and prevent recurrence of the excursion as expeditiously as practicable. [District Rule 2520, 9.3.2 and 40 CFR Part 64] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

36. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR part 64.7. [40 CFR part 64] Federally Enforceable Through Title V Permit
37. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR part 64.9. [40 CFR part 64] Federally Enforceable Through Title V Permit
38. If the District or EPA determine that a Quality improvement plan is required under 40 CFR part 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64.8. [40 CFR Part 64] Federally Enforceable Through Title V Permit



## AUTHORITY TO CONSTRUCT

**PERMIT NO:** N-1646-16-5

**ISSUANCE DATE:** 01/30/2013

**LEGAL OWNER OR OPERATOR:** QG, LLC  
**MAILING ADDRESS:** N63 W23075 HWY 74  
SUSSEX, WI 53089

**LOCATION:** 2201 COOPER AVE  
MERCED, CA 95348

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF GRAPHIC ARTS PRINTING OPERATION CONSISTING OF ONE HARRIS MODEL 1000 HEATSET OFFSET LITHOGRAPHIC PRINTING PRESS #517 SERVED BY TWO TEC NATURAL GAS FIRED DRYING OVENS (TOTAL OF 1.366 MMBTU/HR) ALL VENTED TO THE 9.5 MMBTU/HR MEG TEC ENTERPRISE II OR 18 MMBTU/HR REECO RETHERM MODEL E REGENERATIVE THERMAL OXIDIZERS; DECREASE DAILY VOC LIMIT FROM 69.1 TO 27.0 LB/DAY.

## CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The drying ovens and regenerative thermal oxidizers shall be fired exclusively on natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The drying oven serving the heatset offset printing press shall be maintained under negative pressure and shall be vented through the thermal oxidizer at all times except during periods of start-up while the dryer is being air purged. [District Rule 2201] Federally Enforceable Through Title V Permit

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 / APCO



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**DAVID WARNER, Director of Permit Services**  
1646-16-5, Jan 30 2013 3:55PM - HEINENG : Joint Inspection NOT Required

6. The collection system for the dryer exhaust and for all fugitive VOC emissions shall have a minimum capture efficiency of 90%. [District Rules 2201 and 4607, 5.6] Federally Enforceable Through Title V Permit
7. Each thermal oxidizer shall be operated with a minimum VOC destruction efficiency of 98%. [District Rules 2201 and 4607, 5.6] Federally Enforceable Through Title V Permit
8. Each thermal oxidizer shall be equipped with an operational continuous temperature monitoring and recording instrument. [District , Rules 2201, 2520, 9.3.2, and 40 CFR Part.64] Federally Enforceable Through Title V Permit
9. Each thermal oxidizer shall be operated at a minimum temp. of 1400 deg. F. The incinerator shall be preheated to 1400 deg. F prior to the start-up of the heatset offset printing operation. [District Rules 2201, 2520, 9.3.2, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
10. The VOC content of organic solvents used to perform surface preparation or cleanup shall not exceed the VOC content limits specified in Table 7 of Rule 4607 (Graphic Arts and Paper, Film, Foil, and Fabric Coatings - 12/18/08 version). [District Rule 4607, 5.8.1] Federally Enforceable Through Title V Permit
11. For a permittee using any solvent containing more than 25 g/L (0.21 lb/gal) 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 which 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, 5.8.3] Federally Enforceable Through Title V Permit
12. For a permittee using any solvent containing more than 25 g/L (0.21 lb/gal) of VOC for organic solvent cleaning, solvent shall not be atomized into the open air unless it is vented to a VOC control device. This provision shall not apply to operations where roller or blanket wash is applied automatically and the cleaning of the nozzle tips of automated spray equipment systems, except for robotic systems, and cleaning with nonpropellant-induced, hand-held spray bottles or containers which solvents are dispensed without a propellant-induced force. [District Rule 4607, 5.8.4] Federally Enforceable Through Title V Permit
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14. Permittee shall store or dispose of fresh or 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 the contents of the containers or when the container is empty. [District Rule 4607, 5.9] Federally Enforceable Through Title V Permit
15. The permittee shall properly use and operate all graphic arts printing technologies as directed and/or specified by the manufacturer of the printer or graphic arts material. [District Rule 4607, 5.10] Federally Enforceable Through Title V Permit
16. The Volatile Organic Compound (VOC) content of the printing inks as applied (excluding water and exempt compounds) shall be less than 45% by weight and the VOC content of the fountain solutions shall be less than 15% by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
17. VOC emissions from the printing inks and solvents shall not exceed 27 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
18. NO<sub>x</sub> emissions from the drying oven shall not exceed 4.3 ppmvd @ 19% O<sub>2</sub> (referenced as NO<sub>2</sub>). [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

19. CO emissions from the drying oven shall not exceed 25.0 ppmvd @ 19% O<sub>2</sub>. [District Rule 2201] Federally Enforceable Through Title V Permit
20. Emissions from the drying oven shall not exceed any of the following limits: 0.00285 lb-SO<sub>x</sub>/MMBtu, 0.0076 lb-PM<sub>10</sub>/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
21. NO<sub>x</sub> emissions from the regenerative thermal oxidizers shall not exceed 4.3 ppmvd @ 19% O<sub>2</sub> (referenced as NO<sub>2</sub>). [District Rule 2201] Federally Enforceable Through Title V Permit
22. CO emissions from the regenerative thermal oxidizers shall not exceed 25.0 ppmvd @ 19% O<sub>2</sub>. [District Rule 2201] Federally Enforceable Through Title V Permit
23. Emissions from the regenerative thermal oxidizers shall not exceed any of the following limits: 0.00285 lb-SO<sub>x</sub>/MMBtu, 0.0076 lb-PM<sub>10</sub>/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
24. Source testing to demonstrate compliance with the VOC destruction efficiency of each regenerative thermal oxidizer shall be conducted on an annual basis. [District Rule 2201] Federally Enforceable Through Title V Permit
25. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081, 7.1] Federally Enforceable Through Title V Permit
26. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081, 7.3] Federally Enforceable Through Title V Permit
27. Source testing to determine the destruction efficiency of each regenerative thermal oxidizer shall be conducted using EPA Methods 2, 2A, or 2D for measuring flow rates and EPA Methods 25, 25A, or 25C for measuring total gaseous organic concentrations at the inlet and outlet of the control device. [District Rule 4607, 6.4.7] Federally Enforceable Through Title V Permit
28. Permittee shall maintain a current file of coatings, inks, adhesives, fountain solutions, wash primers, and solvents in use and in storage. The file shall include material safety data sheet (MSDS) or product data sheet showing the material name, manufacturer's name, VOC content as applied, mixing instruction, and density. [District Rule 4607, 6.1.1] Federally Enforceable Through Title V Permit
29. The permittee shall record on a daily basis, the type and amount of each coating, adhesive, fountain solution, wash primer, and solvent used. [District Rule 4607, 6.1.3] Federally Enforceable Through Title V Permit
30. The permittee shall record on a monthly basis, the type and amount of all inks used and their VOC content and densities, using one of the methods listed in Rule 4607, Section 6.1.2.1 (12/18/08 version of Rule 4607). [District Rule 4607, 6.1.2.1] Federally Enforceable Through Title V Permit
31. The permittee shall record on a monthly basis, the type and amount of each ink, coating, adhesive, wash primer, and solvent used. [District Rule 4607, 6.1.2.2] Federally Enforceable Through Title V Permit
32. The permittee shall record on a monthly basis, the type, amount and percent VOC by volume of each fountain solution used. [District Rule 4607, 6.1.2.3] Federally Enforceable Through Title V Permit
33. The permittee shall maintain daily records of the following: (1). Quantity of VOC emitted (in pounds) from this printing press; (2). Cumulative quantity of VOC emitted (in pounds) from all graphic arts printing operations at the facility; (3) Quantity of natural gas used (in cubic feet) by each drying oven and each thermal oxidizer at the facility; (4) Operational temperature of the regenerative thermal oxidizer. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
34. All records shall be maintained and retained on-site for a minimum of five years, and shall be made available for District inspection upon request. [District Rules 1070, 2520, and 4607] Federally Enforceable Through Title V Permit
35. Each thermal oxidizer shall be operated at a minimum temp. of 1400 deg. F. Upon determining an excursion from this requirement, the permittee shall investigate the excursion and take corrective action to minimize emissions and prevent recurrence of the excursion as expeditiously as practicable. [District Rule 2520, 9.3.2 and 40 CFR Part 64] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

36. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR part 64.7. [40 CFR part 64] Federally Enforceable Through Title V Permit
37. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR part 64.9. [40 CFR part 64] Federally Enforceable Through Title V Permit
38. If the District or EPA determine that a Quality improvement plan is required under 40 CFR part 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64.8. [40 CFR Part 64] Federally Enforceable Through Title V Permit



# AUTHORITY TO CONSTRUCT

**PERMIT NO:** N-1646-23-5

**ISSUANCE DATE:** 01/30/2013

**LEGAL OWNER OR OPERATOR:** QG, LLC  
**MAILING ADDRESS:** N63 W23075 HWY 74  
SUSSEX, WI 53089

**LOCATION:** 2201 COOPER AVE  
MERCED, CA 95348

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF GRAPHIC ARTS PRINTING OPERATION CONSISTING OF ONE HEIDELBERG HARRIS MODEL M-1000B HEATSET OFFSET PRINTING PRESS #519 SERVED BY ONE 9.5 MMBTU/HR THERMAL ELECTRON MODEL A3406E DRYING OVEN VENTED TO THE 9.5 MMBTU/HR MEG TEC ENTERPRISE II OR 18 MMBTU/HR REECO RETHERM MODEL E REGENERATIVE THERMAL OXIDIZERS: DECREASE DAILY VOC LIMIT FROM 69.1 TO 37.5 LB/DAY.

## CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The drying ovens and regenerative thermal oxidizers shall be fired exclusively on natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The drying ovens serving the heatset offset printing press shall be maintained under negative pressure and shall be vented through the regenerative thermal oxidizer at all times except during periods of start-up while the dryers are being air purged. [District Rule 2201] Federally Enforceable Through Title V Permit

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 / APCO

  
DAVID WARNER, Director of Permit Services  
N-1646-23-5 - Jan 30 2013 3:55PM -- HEINENG Joint Inspection NOT Required

6. The collection system for the dryer exhausts and for all fugitive VOC emissions shall have a minimum capture efficiency of 90%. [District Rules 2201 and 4607, 5.6] Federally Enforceable Through Title V Permit
7. Each regenerative thermal oxidizer shall be operated with a minimum VOC destruction efficiency of 98%. [District Rules 2201 and 4607, 5.6] Federally Enforceable Through Title V Permit
8. Each regenerative thermal oxidizer shall be operated at a minimum temp. of 1400 deg. F. The regenerative thermal oxidizer shall be preheated to 1400 deg. F prior to the start-up of the heatset offset printing operation. [District Rules 2201 and 2520 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
9. Each regenerative thermal incinerator shall be equipped with a continuous temperature monitoring and recording instrument. [District Rules 2201 and 2520 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
10. The VOC content of organic solvents used to perform surface preparation or cleanup shall not exceed the VOC content limits specified in Table 7 of Rule 4607 (Graphic Arts and Paper, Film, Foil, and Fabric Coatings - 12/18/08 version). [District Rule 4607, 5.8.1] Federally Enforceable Through Title V Permit
11. For a permittee using any solvent containing more than 25 g/L (0.21 lb/gal) 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 which 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, 5.8.3] Federally Enforceable Through Title V Permit
12. For a permittee using any solvent containing more than 25 g/L (0.21 lb/gal) of VOC for organic solvent cleaning, solvent shall not be atomized into the open air unless it is vented to a VOC control device. This provision shall not apply to operations where roller or blanket wash is applied automatically and the cleaning of the nozzle tips of automated spray equipment systems, except for robotic systems, and cleaning with nonpropellant-induced, hand-held spray bottles or containers which solvents are dispensed without a propellant-induced force. [District Rule 4607, 5.8.4] Federally Enforceable Through Title V Permit
13. For a permittee using any solvent containing more than 25 g/L (0.21 lb/gal) of VOC for organic solvent cleaning, the permittee shall not use VOC-containing material to clean spray equipment used for the application of coatings, adhesives, or ink, unless an enclosed system or equipment that is proven to be equally effective at controlling emissions is used for cleaning. If an enclosed system is used, it must totally enclose spray guns, cups, nozzles, bowls, and other parts during washing, rinsing, draining procedures, and it must be used according to manufacturer's recommendations and must be closed when not in use. [District Rule 4607, 5.8.5] Federally Enforceable Through Title V Permit
14. Permittee shall store or dispose of fresh or 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 the contents of the containers or when the container is empty. [District Rule 4607, 5.9] Federally Enforceable Through Title V Permit
15. The permittee shall properly use and operate all graphic arts printing technologies as directed and/or specified by the manufacturer of the printer or graphic arts material. [District Rule 4607, 5.10] Federally Enforceable Through Title V Permit
16. The Volatile Organic Compound (VOC) content of the printing inks as applied (excluding water and exempt compounds) shall be less than 45% by weight and the VOC content of the fountain solutions shall be less than 15% by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
17. VOC emissions from the printing inks and solvents shall not exceed 37.5 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
18. NO<sub>x</sub> emissions from the drying oven shall not exceed 4.3 ppmvd @ 19% O<sub>2</sub> (referenced as NO<sub>2</sub>). [District Rules 2201 & 4309, 5.2] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

19. CO emissions from the drying oven shall not exceed 25.0 ppmvd @ 19% O<sub>2</sub>. [District Rules 2201 & 4309, 5.2] Federally Enforceable Through Title V Permit
20. Emissions from the drying oven shall not exceed any of the following limits: 0.00285 lb-SO<sub>x</sub>/MMBtu, 0.0076 lb-PM<sub>10</sub>/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
21. NO<sub>x</sub> emissions from the regenerative thermal oxidizers shall not exceed 4.3 ppmvd @ 19% O<sub>2</sub> (referenced as NO<sub>2</sub>). [District Rules 2201 & 4309, 5.2] Federally Enforceable Through Title V Permit
22. CO emissions from the regenerative thermal oxidizers shall not exceed 25.0 ppmvd @ 19% O<sub>2</sub>. [District Rules 2201 & 4309, 5.2] Federally Enforceable Through Title V Permit
23. Emissions from the regenerative thermal oxidizers shall not exceed any of the following limits: 0.00285 lb-SO<sub>x</sub>/MMBtu, 0.0076 lb-PM<sub>10</sub>/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
24. Source testing to demonstrate compliance with the VOC destruction efficiency of each regenerative thermal oxidizer shall be conducted on an annual basis. [District Rule 2201] Federally Enforceable Through Title V Permit
25. Source testing to determine the destruction efficiency of each regenerative thermal oxidizer shall be conducted using EPA Methods 2, 2A, or 2D for measuring flow rates and EPA Methods 25, 25A, or 25C for measuring total gaseous organic concentrations at the inlet and outlet of the control device. [District Rule 4607, 6.4.7] Federally Enforceable Through Title V Permit
26. Source testing to measure NO<sub>x</sub> and CO emissions from the drying ovens shall be conducted at the exhaust of the associated regenerative thermal oxidizer at least once every 24 months. [District Rules 2201 and 4309, 6.3.2] Federally Enforceable Through Title V Permit
27. All test results for NO<sub>x</sub> and CO shall be reported in ppmv @ 19% O<sub>2</sub> (or no correction if measured above 19% O<sub>2</sub>), corrected to dry stack conditions. [District Rule 4309, 6.3.7] Federally Enforceable Through Title V Permit
28. NO<sub>x</sub> emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis. [District Rule 4309, 6.2] Federally Enforceable Through Title V Permit
29. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rule 4309, 6.2] Federally Enforceable Through Title V Permit
30. Stack gas oxygen (O<sub>2</sub>) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4309, 6.2] Federally Enforceable Through Title V Permit
31. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4309. [District Rule 4309, 5.5.1 & 5.5.2] Federally Enforceable Through Title V Permit
32. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rule 4309, 5.5.6] Federally Enforceable Through Title V Permit
33. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
34. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
35. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rule 4309, 5.4] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

36. If either the NO<sub>x</sub> or CO concentrations corrected to 19% O<sub>2</sub> (or no correction if measured above 19% O<sub>2</sub>), as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rule 4309, 5.4] Federally Enforceable Through Title V Permit
37. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4309, 5.4] Federally Enforceable Through Title V Permit
38. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 19% O<sub>2</sub> (or no correction if measured above 19% O<sub>2</sub>), (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range [District Rule 4309, 5.4] Federally Enforceable Through Title V Permit
39. Permittee shall maintain a current file of coatings, inks, adhesives, fountain solutions, wash primers, and solvents in use and in storage. The file shall include material safety data sheet (MSDS) or product data sheet showing the material name, manufacturer's name, VOC content as applied, mixing instruction, and density. [District Rule 4607, 6.1.1] Federally Enforceable Through Title V Permit
40. The permittee shall record on a daily basis, the type and amount of each coating, adhesive, fountain solution, wash primer, and solvent used. [District Rule 4607, 6.1.3] Federally Enforceable Through Title V Permit
41. The permittee shall record on a monthly basis, the type and amount of all inks used and their VOC content and densities, using one of the methods listed in Rule 4607, Section 6.1.2.1 (12/18/08 version of Rule 4607). [District Rule 4607, 6.1.2.1] Federally Enforceable Through Title V Permit
42. The permittee shall record on a monthly basis, the type and amount of each ink, coating, adhesive, wash primer, and solvent used. [District Rule 4607, 6.1.2.2] Federally Enforceable Through Title V Permit
43. The permittee shall record on a monthly basis, the type, amount and percent VOC by volume of each fountain solution used. [District Rule 4607, 6.1.2.3] Federally Enforceable Through Title V Permit
44. The permittee shall maintain daily records of the following: (1). Quantity of VOC emitted (in pounds) from this printing press; (2). Cumulative quantity of VOC emitted (in pounds) from all graphic arts printing operations at the facility; (3) Quantity of natural gas used (in cubic feet) by each drying oven and each thermal oxidizer at the facility; (4) Operational temperature of each regenerative thermal oxidizer. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
45. All records shall be maintained and retained on-site for a minimum of five years, and shall be made available for District inspection upon request. [District Rules 1070, 2520, and 4607, and 4309] Federally Enforceable Through Title V Permit
46. Each thermal oxidizer shall be operated at a minimum temp. of 1400 deg. F. Upon determining an excursion from this requirement, the permittee shall investigate the excursion and take corrective action to minimize emissions and prevent recurrence of the excursion as expeditiously as practicable. [District Rule 2520 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
47. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR part 64.7. [40 CFR part 64] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

48. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR part 64.9. [40 CFR part 64] Federally Enforceable Through Title V Permit
49. If the District or EPA determine that a Quality improvement plan is required under 40 CFR part 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64.8. [40 CFR Part 64] Federally Enforceable Through Title V Permit



## AUTHORITY TO CONSTRUCT

**PERMIT NO:** N-1646-25-4

**ISSUANCE DATE:** 01/30/2013

**LEGAL OWNER OR OPERATOR:** QG, LLC  
**MAILING ADDRESS:** N63 W23075 HWY 74  
SUSSEX, WI 53089

**LOCATION:** 2201 COOPER AVE  
MERCED, CA 95348

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF GRAPHIC ARTS PRINTING OPERATION CONSISTING OF ONE (1) KOENIG & BAUER COMMANDER HEATSET OFFSET LITHOGRAPHIC PRINTING PRESS (PRESS #508) AND ONE (1) 31.5 MMBTU/HR (3 BURNERS @ 10.5 MMBTU/HR EACH) NATURAL GAS FIRED MEGTEC MODEL DUAL DRY III 119 DRYING OVEN SERVED BY THE 9.5 MMBTU/HR MEGTEC ENTERPRISE II OR THE 18 MMBTU/HR REECO RETHERM MODEL E NATURAL GAS FIRED REGENERATIVE THERMAL OXIDIZERS: DECREASE DAILY VOC LIMIT FROM 74.1 TO 60.0 LB/DAY.

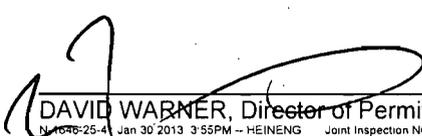
## CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The drying ovens and regenerative thermal oxidizers shall be fired exclusively on natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The drying ovens serving the heatset offset printing press shall be maintained under negative pressure and shall be vented through the regenerative thermal oxidizer at all times except during periods of start-up while the dryers are being air purged. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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Seyed Sadredin, Executive Director / APCO

  
DAVID WARNER, Director of Permit Services  
N-1646-25-4 Jan 30 2013 3:55PM - HEINENG Joint Inspection NOT Required

6. The collection system for the dryer exhausts and for all fugitive VOC emissions shall have a minimum capture efficiency of 90%. [District Rules 2201 and 4607, 5.6] Federally Enforceable Through Title V Permit
7. Each regenerative thermal oxidizer shall be operated with a minimum VOC destruction efficiency of 98%. [District Rules 2201 and 4607, 5.6] Federally Enforceable Through Title V Permit
8. Each regenerative thermal oxidizer shall be operated at a minimum temp. of 1400 deg. F. The regenerative thermal oxidizer shall be preheated to 1400 deg. F prior to the start-up of the heatset offset printing operation. [District Rules 2201 and 2520 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
9. Each regenerative thermal incinerator shall be equipped with a continuous temperature monitoring and recording instrument. [District Rules 2201 and 2520 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
10. The VOC content of organic solvents used to perform surface preparation or cleanup shall not exceed the VOC content limits specified in Table 7 of Rule 4607 (Graphic Arts and Paper, Film, Foil, and Fabric Coatings - 12/18/08 version). [District Rule 4607, 5.8.1] Federally Enforceable Through Title V Permit
11. For a permittee using any solvent containing more than 25 g/L (0.21 lb/gal) 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 which 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, 5.8.3] Federally Enforceable Through Title V Permit
12. For a permittee using any solvent containing more than 25 g/L (0.21 lb/gal) of VOC for organic solvent cleaning, solvent shall not be atomized into the open air unless it is vented to a VOC control device. This provision shall not apply to operations where roller or blanket wash is applied automatically and the cleaning of the nozzle tips of automated spray equipment systems, except for robotic systems, and cleaning with nonpropellant-induced, hand-held spray bottles or containers which solvents are dispensed without a propellant-induced force. [District Rule 4607, 5.8.4] Federally Enforceable Through Title V Permit
13. For a permittee using any solvent containing more than 25 g/L (0.21 lb/gal) of VOC for organic solvent cleaning, the permittee shall not use VOC-containing material to clean spray equipment used for the application of coatings, adhesives, or ink, unless an enclosed system or equipment that is proven to be equally effective at controlling emissions is used for cleaning. If an enclosed system is used, it must totally enclose spray guns, cups, nozzles, bowls, and other parts during washing, rinsing, draining procedures, and it must be used according to manufacturer's recommendations and must be closed when not in use. [District Rule 4607, 5.8.5] Federally Enforceable Through Title V Permit
14. Permittee shall store or dispose of fresh or 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 the contents of the containers or when the container is empty. [District Rule 4607, 5.9] Federally Enforceable Through Title V Permit
15. The permittee shall properly use and operate all graphic arts printing technologies as directed and/or specified by the manufacturer of the printer or graphic arts material. [District Rule 4607, 5.10] Federally Enforceable Through Title V Permit
16. The Volatile Organic Compound (VOC) content of the printing inks as applied (excluding water and exempt compounds) shall be less than 45% by weight and the VOC content of the fountain solutions shall be less than 15% by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
17. VOC emissions from the printing inks and solvents shall not exceed 60 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Emissions from the drying oven shall not exceed any of the following limits: 0.00285 lb-SO<sub>x</sub>/MMBtu, 0.0076 lb-PM<sub>10</sub>/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

19. NO<sub>x</sub> emissions from the drying oven shall not exceed 4.3 ppmvd @ 19% O<sub>2</sub> (referenced as NO<sub>2</sub>). [District Rules 2201 & 4309, 5.2] Federally Enforceable Through Title V Permit
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24. Source testing to demonstrate compliance with the VOC destruction efficiency of each regenerative thermal oxidizer shall be conducted on an annual basis. [District Rule 2201] Federally Enforceable Through Title V Permit
25. Source testing to determine the destruction efficiency of each regenerative thermal oxidizer shall be conducted using EPA Methods 2, 2A, or 2D for measuring flow rates and EPA Methods 25, 25A, or 25C for measuring total gaseous organic concentrations at the inlet and outlet of the control device. [District Rule 4607, 6.4.7] Federally Enforceable Through Title V Permit
26. Source testing to measure NO<sub>x</sub> and CO emissions from the drying ovens shall be conducted at the exhaust of the associated regenerative thermal oxidizer at least once every 24 months. [District Rules 2201 and 4309, 6.3.2] Federally Enforceable Through Title V Permit
27. All test results for NO<sub>x</sub> and CO shall be reported in ppmv @ 19% O<sub>2</sub> (or no correction if measured above 19% O<sub>2</sub>), corrected to dry stack conditions. [District Rule 4309, 6.3.7] Federally Enforceable Through Title V Permit
28. NO<sub>x</sub> emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis. [District Rule 4309, 6.2] Federally Enforceable Through Title V Permit
29. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rule 4309, 6.2] Federally Enforceable Through Title V Permit
30. Stack gas oxygen (O<sub>2</sub>) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4309, 6.2] Federally Enforceable Through Title V Permit
31. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4309. [District Rule 4309, 5.5.1 & 5.5.2] Federally Enforceable Through Title V Permit
32. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rule 4309, 5.5.6] Federally Enforceable Through Title V Permit
33. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
34. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
35. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rule 4309, 5.4] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

36. If either the NO<sub>x</sub> or CO concentrations corrected to 19% O<sub>2</sub> (or no correction if measured above 19% O<sub>2</sub>), as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rule 4309, 5.4] Federally Enforceable Through Title V Permit
37. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4309, 5.4] Federally Enforceable Through Title V Permit
38. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 19% O<sub>2</sub> (or no correction if measured above 19% O<sub>2</sub>), (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range [District Rule 4309, 5.4] Federally Enforceable Through Title V Permit
39. Permittee shall maintain a current file of coatings, inks, adhesives, fountain solutions, wash primers, and solvents in use and in storage. The file shall include material safety data sheet (MSDS) or product data sheet showing the material name, manufacturer's name, VOC content as applied, mixing instruction, and density. [District Rule 4607, 6.1.1] Federally Enforceable Through Title V Permit
40. The permittee shall record on a daily basis, the type and amount of each coating, adhesive, fountain solution, wash primer, and solvent used. [District Rule 4607, 6.1.3] Federally Enforceable Through Title V Permit
41. The permittee shall record on a monthly basis, the type and amount of all inks used and their VOC content and densities, using one of the methods listed in Rule 4607, Section 6.1.2.1 (12/18/08 version of Rule 4607). [District Rule 4607, 6.1.2.1] Federally Enforceable Through Title V Permit
42. The permittee shall record on a monthly basis, the type and amount of each ink, coating, adhesive, wash primer, and solvent used. [District Rule 4607, 6.1.2.2] Federally Enforceable Through Title V Permit
43. The permittee shall record on a monthly basis, the type, amount and percent VOC by volume of each fountain solution used. [District Rule 4607, 6.1.2.3] Federally Enforceable Through Title V Permit
44. The permittee shall maintain daily records of the following: (1). Quantity of VOC emitted (in pounds) from this printing press; (2). Cumulative quantity of VOC emitted (in pounds) from all graphic arts printing operations at the facility; (3) Quantity of natural gas used (in cubic feet) by each drying oven and each thermal oxidizer at the facility; (4) Operational temperature of each regenerative thermal oxidizer. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
45. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 2520, and 4607, and 4309] Federally Enforceable Through Title V Permit
46. Each thermal oxidizer shall be operated at a minimum temp. of 1400 deg. F. Upon determining an excursion from this requirement, the permittee shall investigate the excursion and take corrective action to minimize emissions and prevent recurrence of the excursion as expeditiously as practicable. [District Rule 2520 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
47. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR part 64.7. [40 CFR part 64] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

48. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR part 64.9. [40 CFR part 64] Federally Enforceable Through Title V Permit
49. If the District or EPA determine that a Quality improvement plan is required under 40 CFR part 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64.8. [40 CFR Part 64] Federally Enforceable Through Title V Permit



## AUTHORITY TO CONSTRUCT

**PERMIT NO:** N-1646-36-4

**ISSUANCE DATE:** 01/30/2013

**LEGAL OWNER OR OPERATOR:** QG, LLC  
**MAILING ADDRESS:** N63 W23075 HWY 74  
SUSSEX, WI 53089

**LOCATION:** 2201 COOPER AVE  
MERCED, CA 95348

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF GRAPHIC ARTS PRINTING OPERATION CONSISTING OF ONE MAN ROLAND MODEL ROTOMAN S 57.5" WIDE 8-COLOR HEATSET OFFSET LITHOGRAPHIC PRINTING PRESS (PRESS #520) AND TWO 9.9 MMBTU/HR NATURAL GAS FIRED MEGTEC MODEL DD III-135 DRYING OVENS (EACH CONSISTS OF AN 8.4 MMBTU/HR MAXON OVENPAK 400 BURNER AND A 1.5 MMBTU/HR MAXON APX BURNER) SERVED BY THE SHARED 9.5 MMBTU/HR MEGTEC ENTERPRISE II OR THE 18 MMBTU/HR REECO RETHERM MODEL E NATURAL GAS FIRED REGENERATIVE THERMAL OXIDIZERS: INCREASE DAILY VOC LIMIT FROM 50.0 TO 95.5 LB/DAY.

## CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The drying ovens and regenerative thermal oxidizers shall be fired exclusively on natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The drying ovens serving the heatset offset printing press shall be maintained under negative pressure and shall be vented through the regenerative thermal oxidizer at all times except during periods of start-up while the dryers are being air purged. [District Rule 2201] Federally Enforceable Through Title V Permit

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 / APCO

  
DAVID WARNER, Director of Permit Services  
N-1646-36-4 Jan 30 2013 3:55PM -- HEINENG Joint Inspection NOT Required

6. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
7. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of natural gas combusted in the drying ovens shall be installed, utilized and maintained. [District Rules 2201] Federally Enforceable Through Title V Permit
8. The collection system for the dryer exhausts and for all fugitive VOC emissions shall have a minimum capture efficiency of 90%. [District Rules 2201 and 4607, 5.6] Federally Enforceable Through Title V Permit
9. Each regenerative thermal oxidizer shall be operated with a minimum VOC destruction efficiency of 98%. [District Rules 2201 and 4607, 5.6] Federally Enforceable Through Title V Permit
10. Each regenerative thermal oxidizer shall be operated at a minimum temp. of 1400 deg. F. The regenerative thermal oxidizer shall be preheated to 1400 deg. F prior to the start-up of the heatset offset printing operation. [District Rules 2201 and 2520 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
11. Each regenerative thermal incinerator shall be equipped with a continuous temperature monitoring and recording instrument. [District Rules 2201 and 2520 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
12. The VOC content of organic solvents used to perform surface preparation or cleanup shall not exceed the VOC content limits specified in Table 7 of Rule 4607 (Graphic Arts and Paper, Film, Foil, and Fabric Coatings - 12/18/08 version). [District Rule 4607, 5.8.1] Federally Enforceable Through Title V Permit
13. For a permittee using any solvent containing more than 25 g/L (0.21 lb/gal) 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 which 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, 5.8.3] Federally Enforceable Through Title V Permit
14. For a permittee using any solvent containing more than 25 g/L (0.21 lb/gal) of VOC for organic solvent cleaning, solvent shall not be atomized into the open air unless it is vented to a VOC control device. This provision shall not apply to operations where roller or blanket wash is applied automatically and the cleaning of the nozzle tips of automated spray equipment systems, except for robotic systems, and cleaning with nonpropellant-induced, hand-held spray bottles or containers which solvents are dispensed without a propellant-induced force. [District Rule 4607, 5.8.4] Federally Enforceable Through Title V Permit
15. For a permittee using any solvent containing more than 25 g/L (0.21 lb/gal) of VOC for organic solvent cleaning, the permittee shall not use VOC-containing material to clean spray equipment used for the application of coatings, adhesives, or ink, unless an enclosed system or equipment that is proven to be equally effective at controlling emissions is used for cleaning. If an enclosed system is used, it must totally enclose spray guns, cups, nozzles, bowls, and other parts during washing, rinsing, draining procedures, and it must be used according to manufacturer's recommendations and must be closed when not in use. [District Rule 4607, 5.8.5] Federally Enforceable Through Title V Permit
16. Permittee shall store or dispose of fresh or 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 the contents of the containers or when the container is empty. [District Rule 4607, 5.9] Federally Enforceable Through Title V Permit
17. The permittee shall properly use and operate all graphic arts printing technologies as directed and/or specified by the manufacturer of the printer or graphic arts material. [District Rule 4607, 5.10] Federally Enforceable Through Title V Permit

18. The Volatile Organic Compound (VOC) content of the printing inks as applied (excluding water and exempt compounds) shall be less than 45% by weight and the VOC content of the fountain solutions shall be less than 15% by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
19. VOC emissions from the printing inks and solvents shall not exceed 95.5 pounds in any one day. [District NSR Rule] Federally Enforceable Through Title V Permit
20. Emissions from the drying ovens shall not exceed any of the following limits: 0.00285 lb-SO<sub>x</sub>/MMBtu, 0.0076 lb-PM<sub>10</sub>/MMBtu, or 0.0055 lb-VOC/MMBtu. [District NSR Rule] Federally Enforceable Through Title V Permit
21. NO<sub>x</sub> emissions from the drying oven shall not exceed 4.3 ppmvd @ 19% O<sub>2</sub> (referenced as NO<sub>2</sub>). [District Rules 2201 & 4309, 5.2] Federally Enforceable Through Title V Permit
22. CO emissions from the drying oven shall not exceed 25.0 ppmvd @ 19% O<sub>2</sub>. [District Rules 2201 & 4309, 5.2] Federally Enforceable Through Title V Permit
23. Emissions from the regenerative thermal oxidizers shall not exceed any of the following limits: 0.00285 lb-SO<sub>x</sub>/MMBtu, 0.0076 lb-PM<sub>10</sub>/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
24. NO<sub>x</sub> emissions from the regenerative thermal oxidizers shall not exceed 4.3 ppmvd @ 19% O<sub>2</sub> (referenced as NO<sub>2</sub>). [District Rules 2201 & 4309, 5.2] Federally Enforceable Through Title V Permit
25. CO emissions from the regenerative thermal oxidizers shall not exceed 25.0 ppmvd @ 19% O<sub>2</sub>. [District Rules 2201 & 4309, 5.2] Federally Enforceable Through Title V Permit
26. The total quantity of natural gas used in the drying ovens under this permit unit shall not exceed 18.7 million cubic feet in any one calendar year. [District Rule 2201] Federally Enforceable Through Title V Permit
27. Source testing to demonstrate compliance with the VOC destruction efficiency of each regenerative thermal oxidizer shall be conducted on an annual basis. [District Rule 2201] Federally Enforceable Through Title V Permit
28. Source testing to determine the destruction efficiency of each regenerative thermal oxidizer shall be conducted using EPA Methods 2, 2A, or 2D for measuring flow rates and EPA Methods 25, 25A, or 25C for measuring total gaseous organic concentrations at the inlet and outlet of the control device. [District Rule 4607, 6.4.7] Federally Enforceable Through Title V Permit
29. Source testing to measure NO<sub>x</sub> and CO emissions from the drying ovens shall be conducted at the exhaust of the associated regenerative thermal oxidizer at least once every 24 months. [District Rules 2201 and 4309, 6.3.2] Federally Enforceable Through Title V Permit
30. All test results for NO<sub>x</sub> and CO shall be reported in ppmv @ 19% O<sub>2</sub> (or no correction if measured above 19% O<sub>2</sub>), corrected to dry stack conditions. [District Rule 4309, 6.3.7] Federally Enforceable Through Title V Permit
31. NO<sub>x</sub> emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis. [District Rule 4309, 6.2] Federally Enforceable Through Title V Permit
32. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rule 4309, 6.2] Federally Enforceable Through Title V Permit
33. Stack gas oxygen (O<sub>2</sub>) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4309, 6.2] Federally Enforceable Through Title V Permit
34. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4309. [District Rule 4309, 5.5.1 & 5.5.2] Federally Enforceable Through Title V Permit
35. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rule 4309, 5.5.6] Federally Enforceable Through Title V Permit

36. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
37. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
38. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rule 4309, 5.4] Federally Enforceable Through Title V Permit
39. If either the NO<sub>x</sub> or CO concentrations corrected to 19% O<sub>2</sub> (or no correction if measured above 19% O<sub>2</sub>), as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rule 4309, 5.4] Federally Enforceable Through Title V Permit
40. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4309, 5.4] Federally Enforceable Through Title V Permit
41. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 19% O<sub>2</sub> (or no correction if measured above 19% O<sub>2</sub>), (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range [District Rule 4309, 5.4] Federally Enforceable Through Title V Permit
42. Permittee shall maintain a current file of coatings, inks, adhesives, fountain solutions, wash primers, and solvents in use and in storage. The file shall include material safety data sheet (MSDS) or product data sheet showing the material name, manufacturer's name, VOC content as applied, mixing instruction, and density. [District Rule 4607, 6.1.1] Federally Enforceable Through Title V Permit
43. The permittee shall record on a daily basis, the type and amount of each coating, adhesive, fountain solution, wash primer, and solvent used. [District Rule 4607, 6.1.3] Federally Enforceable Through Title V Permit
44. The permittee shall record on a monthly basis, the type and amount of all inks used and their VOC content and densities, using one of the methods listed in Rule 4607, Section 6.1.2.1 (12/18/08 version of Rule 4607). [District Rule 4607, 6.1.2.1] Federally Enforceable Through Title V Permit
45. The permittee shall record on a monthly basis, the type and amount of each ink, coating, adhesive, wash primer, and solvent used. [District Rule 4607, 6.1.2.2] Federally Enforceable Through Title V Permit
46. The permittee shall record on a monthly basis, the type, amount and percent VOC by volume of each fountain solution used. [District Rule 4607, 6.1.2.3] Federally Enforceable Through Title V Permit
47. The permittee shall maintain daily records of the following: (1). Quantity of VOC emitted (in pounds) from this printing press; (2). Cumulative quantity of VOC emitted (in pounds) from all graphic arts printing operations at the facility; (3) Quantity of natural gas used (in cubic feet) by each drying oven and each thermal oxidizer at the facility; (4) Operational temperature of each regenerative thermal oxidizer. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

48. The permittee shall maintain a record of the cumulative annual quantity of natural gas used (in cubic feet) by the drying ovens under this permit. The cumulative total quantity of natural gas used shall be updated monthly. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
49. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 2520, and 4607, and 4309] Federally Enforceable Through Title V Permit
50. The regenerative thermal oxidizer shall be operated at a minimum temp. of 1400 deg. F. Upon determining an excursion from this requirement, the permittee shall investigate the excursion and take corrective action to minimize emissions and prevent recurrence of the excursion as expeditiously as practicable. [District Rule 2520 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
51. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR part 64.7. [40 CFR part 64] Federally Enforceable Through Title V Permit
52. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR part 64.9. [40 CFR part 64] Federally Enforceable Through Title V Permit
53. If the District or EPA determine that a Quality improvement plan is required under 40 CFR part 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64.8. [40 CFR Part 64] Federally Enforceable Through Title V Permit



## AUTHORITY TO CONSTRUCT

**PERMIT NO:** N-1646-37-3

**ISSUANCE DATE:** 01/30/2013

**LEGAL OWNER OR OPERATOR:** QG, LLC  
**MAILING ADDRESS:** N63 W23075 HWY 74  
SUSSEX, WI 53089

**LOCATION:** 2201 COOPER AVE  
MERCED, CA 95348

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF GRAPHIC ARTS PRINTING OPERATION CONSISTING OF ONE MAN ROLAND MODEL ROTOMAN S 64" WIDE 8-COLOR HEATSET OFFSET LITHOGRAPHIC PRINTING PRESS (PRESS #522) WITH ONE 9.4 MMBTU/HR NATURAL GAS MEGTEC MODEL DD III-135-2080 DRYING OVEN #1 AND ONE 9.0 MMBTU/HR NATURAL GAS FIRED MODEL DD III-135-2080 DRYING OVEN #2 EACH VENTED TO THE SHARED 5.728 MMBTU/HR MEGTEC CLEANSWITCH MODEL CS-300-95 NATURAL GAS FIRED REGENERATIVE THERMAL OXIDIZER: INCREASE DAILY VOC LIMIT FROM 50.0 TO 95.5 LB/DAY.

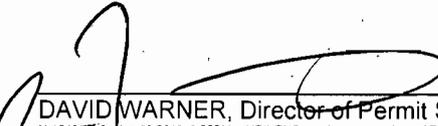
### CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The drying ovens and regenerative thermal oxidizer shall be fired exclusively on natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
5. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of natural gas combusted in the drying ovens shall be installed, utilized and maintained. [District Rules 2201] Federally Enforceable Through Title V Permit

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 / APCO

  
DAVID WARNER, Director of Permit Services

N-1646-37-3 Jan 30 2013 3:55PM - HEINENG : Joint Inspection NOT Required

6. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of natural gas combusted in the regenerative thermal oxidizer shall be installed, utilized and maintained. [District Rules 2201] Federally Enforceable Through Title V Permit
7. The drying ovens serving the heatset offset printing press shall be maintained under negative pressure and shall be vented through the regenerative thermal oxidizer at all times except during periods of start-up while the dryers are being air purged. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102] Federally Enforceable Through Title V Permit
9. The collection system for the dryer exhausts and for all fugitive VOC emissions shall have a minimum capture efficiency of 90%. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The regenerative thermal oxidizer shall be operated with a minimum VOC destruction efficiency of 98%. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The regenerative thermal oxidizer shall be operated at a minimum temp. of 1400 deg. F. The incinerator shall be preheated to 1400 deg. F prior to the start-up of the heatset offset printing operation. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The regenerative thermal oxidizer shall be equipped with an operational continuous temperature monitoring and recording instrument. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The VOC content of the materials shall not exceed the following: inks less than 45% VOC by weight (less water and exempt compounds) and fountain solutions less than 15% by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The VOC content of organic solvents used to perform surface preparation or cleanup shall not exceed the VOC content limits specified in Table 7 of Rule 4607 (Graphic Arts and Paper, Film, Foil, and Fabric Coatings - 12/18/08 version). [District Rule 4607] Federally Enforceable Through Title V Permit
15. For a permittee using any solvent containing more than 25 g/L (0.21 lb/gal) 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 which 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
16. Solvents shall not be atomized into the open air unless it is vented to a VOC control device. This provision shall not apply to operations where roller or blanket wash is applied automatically and the cleaning of the nozzle tips of automated spray equipment systems, except for robotic systems, and cleaning with nonpropellant-induced, hand-held spray bottles or containers which solvents are dispensed without a propellant-induced force. [District Rule 4607] Federally Enforceable Through Title V Permit
17. The permittee shall not use VOC-containing material to clean spray equipment used for the application of coatings, adhesives, or ink, unless an enclosed system or equipment that is proven to be equally effective at controlling emissions is used for cleaning. If an enclosed system is used, it must totally enclose spray guns, cups, nozzles, bowls, and other parts during washing, rinsing, draining procedures, and it must be used according to manufacturer's recommendations and must be closed when not in use. [District Rule 4607] Federally Enforceable Through Title V Permit
18. Permittee shall store or dispose of fresh or 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 the contents of the containers or when the container is empty. [District Rule 4607] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

19. The permittee shall properly use and operate all graphic arts printing technologies as directed and/or specified by the manufacturer of the printer or graphic arts material. [District Rule 4607] Federally Enforceable Through Title V Permit
20. VOC emissions from the printing inks and solvents shall not exceed 95.5 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
21. NO<sub>x</sub> emissions from the drying ovens shall not exceed 4.3 ppmvd @ 19% O<sub>2</sub> (referenced as NO<sub>2</sub>) or 0.0492 lb-NO<sub>x</sub>/MMBtu. [District Rules 2201 & 4309] Federally Enforceable Through Title V Permit
22. VOC emission from the drying ovens shall not exceed 0.0055 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
23. Emissions from the drying ovens shall not exceed any of the following limits: 0.00285 lb-SO<sub>x</sub>/MMBtu, 0.0076 lb-PM<sub>10</sub>/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
24. NO<sub>x</sub> emissions from the regenerative thermal oxidizer shall not exceed 4.3 ppmvd @ 19% O<sub>2</sub> (referenced as NO<sub>2</sub>) or 0.0492 lb-NO<sub>x</sub>/MMBtu. [District Rules 2201 & 4309] Federally Enforceable Through Title V Permit
25. CO emissions from the regenerative thermal oxidizer shall not exceed 25.0 ppmvd @ 19% O<sub>2</sub> or 0.174 lb-CO/MMBtu. [District Rules 2201 & 4309] Federally Enforceable Through Title V Permit
26. Emissions from the regenerative thermal oxidizers shall not exceed any of the following limits: 0.00285 lb-SO<sub>x</sub>/MMBtu, 0.0076 lb-PM<sub>10</sub>/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
27. The total quantity of natural gas used in the drying ovens under this permit unit shall not exceed 137,000 cubic feet in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
28. The total quantity of natural gas used in the drying ovens under this permit unit shall not exceed 50.0 million cubic feet in any one calendar year. [District Rule 2201] Federally Enforceable Through Title V Permit
29. The total quantity of natural gas used in the regenerative thermal oxidizer shall not exceed 25,000 million cubic feet in any one calendar year. [District Rule 2201] Federally Enforceable Through Title V Permit
30. Source testing to demonstrate compliance with the VOC destruction efficiency of the regenerative thermal oxidizer shall be conducted on an annual basis. [District Rule 2201] Federally Enforceable Through Title V Permit
31. Source testing to determine the destruction efficiency of the regenerative thermal oxidizer shall be conducted using EPA Methods 2, 2A, or 2D for measuring flow rates and EPA Methods 25, 25A, or 25C for measuring total gaseous organic concentrations at the inlet and outlet of the control device. [District Rule 4607] Federally Enforceable Through Title V Permit
32. Source testing to measure NO<sub>x</sub> and CO emissions from the drying ovens shall be conducted at the exhaust of the associated regenerative thermal oxidizer at least once every 24 months. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit
33. All test results for NO<sub>x</sub> and CO shall be reported in ppmv @ 19% O<sub>2</sub> (or no correction if measured above 19% O<sub>2</sub>), corrected to dry stack conditions. [District Rule 4309] Federally Enforceable Through Title V Permit
34. NO<sub>x</sub> emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis. [District Rule 4309] Federally Enforceable Through Title V Permit
35. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rule 4309] Federally Enforceable Through Title V Permit
36. Stack gas oxygen (O<sub>2</sub>) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4309] Federally Enforceable Through Title V Permit
37. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4309. [District Rule 4309] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

38. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rule 4309] Federally Enforceable Through Title V Permit
39. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
40. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
41. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rule 4309] Federally Enforceable Through Title V Permit
42. If either the NO<sub>x</sub> or CO concentrations corrected to 19% O<sub>2</sub> (or no correction if measured above 19% O<sub>2</sub>), as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rule 4309] Federally Enforceable Through Title V Permit
43. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4309] Federally Enforceable Through Title V Permit
44. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 19% O<sub>2</sub> (or no correction if measured above 19% O<sub>2</sub>), (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rule 4309] Federally Enforceable Through Title V Permit
45. Permittee shall maintain a current file of coatings, inks, adhesives, fountain solutions, wash primers, and solvents in use and in storage. The file shall include material safety data sheet (MSDS) or product data sheet showing the material name, manufacturer's name, VOC content as applied, mixing instruction, and density. [District Rule 4607] Federally Enforceable Through Title V Permit
46. The permittee shall record on a daily basis, the type and amount of each coating, adhesive, fountain solution, wash primer, and solvent used. [District Rule 2201 & 4607] Federally Enforceable Through Title V Permit
47. The permittee shall record on a monthly basis, the type and amount of all inks used and their VOC content and densities, using one of the methods listed in Rule 4607, Section 6.1.2.1 (12/18/08 version of Rule 4607). [District Rule 4607] Federally Enforceable Through Title V Permit
48. The permittee shall record on a monthly basis, the type and amount of each ink, coating, adhesive, wash primer, and solvent used. [District Rule 4607] Federally Enforceable Through Title V Permit
49. The permittee shall record on a monthly basis, the type, amount and percent VOC by volume of each fountain solution used. [District Rule 4607] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

50. The permittee shall maintain daily records of the following: (1). Quantity of VOC emitted (in pounds) from this printing press; (2). Cumulative quantity of VOC emitted (in pounds) from all graphic arts printing operations at the facility; (3) Quantity of natural gas used (in cubic feet) by each drying oven and each thermal oxidizer at the facility; (4) Operational temperature of each thermal oxidizer. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
51. The permittee shall maintain a record of the cumulative annual quantity of natural gas used (in cubic feet) by the drying ovens under this permit. The cumulative total quantity of natural gas used shall be updated monthly. [District Rule 2201] Federally Enforceable Through Title V Permit
52. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070 and 4309] Federally Enforceable Through Title V Permit



## AUTHORITY TO CONSTRUCT

**PERMIT NO:** N-1646-38-5

**ISSUANCE DATE:** 01/30/2013

**LEGAL OWNER OR OPERATOR:** QG, LLC  
**MAILING ADDRESS:** N63 W23075 HWY 74  
SUSSEX, WI 53089

**LOCATION:** 2201 COOPER AVE  
MERCED, CA 95348

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF GRAPHIC ARTS PRINTING OPERATION CONSISTING OF ONE MAN ROLAND MODEL ROTOMAN S 64" WIDE 8-COLOR HEATSET OFFSET LITHOGRAPHIC PRINTING PRESS (PRESS #523) WITH ONE 9.4 MMBTU/HR NATURAL GAS FIRED MEGTEC MODEL DD III-135-2080 DRYING OVEN #1 (WITH MAXON LOW NOX BURNERS) AND ONE 9.0 MMBTU/HR NATURAL GAS FIRED MEGTEC MODEL DD III-135-2080 DRYING OVEN #2 (WITH MAXON LOW NOX BURNERS) EACH SERVED BY THE SHARED 9.5 MMBTU/HR MEGTEC ENTERPRISE II OR THE 18 MMBTU/HR REECO RETHERM MODEL E NATURAL GAS FIRED REGENERATIVE THERMAL OXIDIZERS: INCREASE DAILY VOC LIMIT FROM 50.0 TO 95.5 LB/DAY.

## CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The drying ovens and regenerative thermal oxidizers shall be fired exclusively on natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
5. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of natural gas combusted in each drying oven shall be installed, utilized and maintained. [District Rules 2201] Federally Enforceable Through Title V Permit

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 / APCO

  
DAVID WARNER, Director of Permit Services  
N-1646-38-5 : Jan 30 2013 3:55PM -- HEINENG : Joint Inspection NOT Required

6. The drying ovens serving the heatset offset printing press shall be maintained under negative pressure and shall be vented through the thermal oxidizer at all times except during periods of start-up while the dryers are being air purged. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
8. The collection system for the dryer exhausts and for all fugitive VOC emissions shall have a minimum capture efficiency of 90%. [District Rules 2201 and 4607, 5.6] Federally Enforceable Through Title V Permit
9. Each thermal oxidizer shall be operated with a minimum VOC destruction efficiency of 98%. [District Rules 2201 and 4607, 5.6] Federally Enforceable Through Title V Permit
10. Each thermal oxidizer shall be equipped with an operational continuous temperature monitoring and recording instrument. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The VOC content of the materials shall not exceed the following: inks less than 45% VOC by weight (less water and exempt compounds) and fountain solutions less than 15% by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The VOC content of organic solvents used to perform surface preparation or solvent cleaning shall not exceed the VOC content limits specified in Table 7 of Rule 4607 (Graphic Arts and Paper, Film, Foil, and Fabric Coatings - 12/18/08 version). [District Rule 4607, 5.8.1] Federally Enforceable Through Title V Permit
13. For a permittee using any solvent containing more than 25 g/L (0.21 lb/gal) 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 which 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, 5.8.3] Federally Enforceable Through Title V Permit
14. For a permittee using any solvent containing more than 25 g/L (0.21 lb/gal) of VOC for organic solvent cleaning, solvent shall not be atomized into the open air unless it is vented to a VOC control device. This provision shall not apply to operations where roller or blanket wash is applied automatically and the cleaning of the nozzle tips of automated spray equipment systems, except for robotic systems, and cleaning with nonpropellant-induced, hand-held spray bottles or containers which solvents are dispensed without a propellant-induced force. [District Rule 4607, 5.8.4] Federally Enforceable Through Title V Permit
15. For a permittee using any solvent containing more than 25 g/L (0.21 lb/gal) of VOC for organic solvent cleaning, the permittee shall not use VOC-containing material to clean spray equipment used for the application of coatings, adhesives, or ink, unless an enclosed system or equipment that is proven to be equally effective at controlling emissions is used for cleaning. If an enclosed system is used, it must totally enclose spray guns, cups, nozzles, bowls, and other parts during washing, rinsing, draining procedures, and it must be used according to manufacturer's recommendations and must be closed when not in use. [District Rule 4607, 5.8.5] Federally Enforceable Through Title V Permit
16. Permittee shall store or dispose of fresh or 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 the contents of the containers or when the container is empty. [District Rule 4607, 5.9] Federally Enforceable Through Title V Permit
17. The permittee shall properly use and operate all graphic arts printing technologies as directed and/or specified by the manufacturer of the printer or graphic arts material. [District Rule 4607, 5.10] Federally Enforceable Through Title V Permit
18. VOC emissions from the printing inks and solvents shall not exceed 95.5 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

19. NO<sub>x</sub> emissions from the drying ovens shall not exceed 4.3 ppmvd @ 19% O<sub>2</sub> (referenced as NO<sub>2</sub>). [District Rules 2201 & 4309, 5.2] Federally Enforceable Through Title V Permit
20. CO emissions from the drying ovens shall not exceed 25.0 ppmvd @ 19% O<sub>2</sub>. [District Rules 2201 & 4309, 5.2] Federally Enforceable Through Title V Permit
21. Emissions from the drying ovens shall not exceed any of the following limits: 0.00285 lb-SO<sub>x</sub>/MMBtu, 0.0076 lb-PM<sub>10</sub>/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
22. NO<sub>x</sub> emissions from the regenerative thermal oxidizers shall not exceed 4.3 ppmvd @ 19% O<sub>2</sub> (referenced as NO<sub>2</sub>). [District Rules 2201 & 4309, 5.2] Federally Enforceable Through Title V Permit
23. CO emissions from the regenerative thermal oxidizers shall not exceed 25.0 ppmvd @ 19% O<sub>2</sub>. [District Rules 2201 & 4309, 5.2] Federally Enforceable Through Title V Permit
24. Emissions from the regenerative thermal oxidizers shall not exceed any of the following limits: 0.00285 lb-SO<sub>x</sub>/MMBtu, 0.0076 lb-PM<sub>10</sub>/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
25. The total quantity of natural gas used in the drying ovens under this permit unit shall not exceed 137,000 cubic feet in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
26. The total quantity of natural gas used in the drying ovens under this permit unit shall not exceed 50.0 million cubic feet in any one calendar year. [District Rule 2201] Federally Enforceable Through Title V Permit
27. Source testing to demonstrate compliance with the VOC destruction efficiency of each regenerative thermal oxidizer shall be conducted on an annual basis. [District NSR Rule] Federally Enforceable Through Title V Permit
28. Source testing to determine the destruction efficiency of each regenerative thermal oxidizer shall be conducted using EPA Methods 2, 2A, or 2D for measuring flow rates and EPA Methods 25, 25A, or 25C for measuring total gaseous organic concentrations at the inlet and outlet of the control device. [District Rule 4607, 6.4.7] Federally Enforceable Through Title V Permit
29. Source testing to measure NO<sub>x</sub> and CO emissions from the drying ovens shall be conducted at the exhaust of the associated regenerative thermal oxidizer at least once every 24 months. [District Rules 2201 and 4309, 6.3.2] Federally Enforceable Through Title V Permit
30. All test results for NO<sub>x</sub> and CO shall be reported in ppmv @ 19% O<sub>2</sub> (or no correction if measured above 19% O<sub>2</sub>), corrected to dry stack conditions. [District Rule 4309, 6.3.7] Federally Enforceable Through Title V Permit
31. NO<sub>x</sub> emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis. [District Rule 4309, 6.2] Federally Enforceable Through Title V Permit
32. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rule 4309, 6.2] Federally Enforceable Through Title V Permit
33. Stack gas oxygen (O<sub>2</sub>) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4309, 6.2] Federally Enforceable Through Title V Permit
34. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4309. [District Rule 4309, 5.5.1 & 5.5.2] Federally Enforceable Through Title V Permit
35. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rule 4309, 5.5.6] Federally Enforceable Through Title V Permit
36. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

37. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
38. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rule 4309, 5.4] Federally Enforceable Through Title V Permit
39. If either the NO<sub>x</sub> or CO concentrations corrected to 19% O<sub>2</sub> (or no correction if measured above 19% O<sub>2</sub>), as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rule 4309, 5.4] Federally Enforceable Through Title V Permit
40. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4309, 5.4] Federally Enforceable Through Title V Permit
41. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 19% O<sub>2</sub> (or no correction if measured above 19% O<sub>2</sub>), (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range [District Rule 4309, 5.4] Federally Enforceable Through Title V Permit
42. Permittee shall maintain a current file of coatings, inks, adhesives, fountain solutions, wash primers, and solvents in use and in storage. The file shall include material safety data sheet (MSDS) or product data sheet showing the material name, manufacturer's name, VOC content as applied, mixing instruction, and density. [District Rule 4607, 6.1.1] Federally Enforceable Through Title V Permit
43. The permittee shall record on a daily basis, the type and amount of each coating, adhesive, fountain solution, wash primer, and solvent used. [District Rule 4607, 6.1.3] Federally Enforceable Through Title V Permit
44. The permittee shall record on a monthly basis, the type and amount of all inks used and their VOC content and densities, using one of the methods listed in Rule 4607, Section 6.1.2.1 (12/18/08 version of Rule 4607). [District Rule 4607, 6.1.2.1] Federally Enforceable Through Title V Permit
45. The permittee shall record on a monthly basis, the type and amount of each ink, coating, adhesive, wash primer, and solvent used. [District Rule 4607, 6.1.2.2] Federally Enforceable Through Title V Permit
46. The permittee shall record on a monthly basis, the type, amount and percent VOC by volume of each fountain solution used. [District Rule 4607, 6.1.2.3] Federally Enforceable Through Title V Permit
47. The permittee shall maintain daily records of the following: (1). Quantity of VOC emitted (in pounds) from this printing press; (2). Cumulative quantity of VOC emitted (in pounds) from all graphic arts printing operations at the facility; (3) Quantity of natural gas used (in cubic feet) by each drying oven and each thermal oxidizer at the facility; (4) Operational temperature of each regenerative thermal oxidizer. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
48. The permittee shall maintain a record of the cumulative annual quantity of natural gas used (in cubic feet) by the drying ovens under this permit. The cumulative total quantity of natural gas used shall be updated monthly. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

49. All records shall be maintained and retained on-site for a minimum of five years, and shall be made available for District inspection upon request. [District Rules 1070, 2520, and 4607, and 4309] Federally Enforceable Through Title V Permit
50. The regenerative thermal oxidizer shall be operated at a minimum temp. of 1400 deg. F. The regenerative thermal oxidizer shall be preheated to 1400 deg. F prior to the start-up of the heatset offset printing operation. [District Rules 2201 and 2520 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
51. The regenerative thermal oxidizer shall be operated at a minimum temp. of 1400 deg. F. Upon determining an excursion from this requirement, the permittee shall investigate the excursion and take corrective action to minimize emissions and prevent recurrence of the excursion as expeditiously as practicable. [District Rule 2520 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
52. The regenerative thermal incinerator shall be equipped with a continuous temperature monitoring and recording instrument. [District Rules 2201 and 2520 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
53. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR part 64.7. [40 CFR part 64] Federally Enforceable Through Title V Permit
54. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR part 64.9. [40 CFR part 64] Federally Enforceable Through Title V Permit
55. If the District or EPA determine that a Quality improvement plan is required under 40 CFR part 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64.8. [40 CFR Part 64] Federally Enforceable Through Title V Permit



## AUTHORITY TO CONSTRUCT

**PERMIT NO:** N-1646-39-5

**ISSUANCE DATE:** 01/30/2013

**LEGAL OWNER OR OPERATOR:** QG, LLC  
**MAILING ADDRESS:** N63 W23075 HWY 74  
SUSSEX, WI 53089

**LOCATION:** 2201 COOPER AVE  
MERCED, CA 95348

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF GRAPHIC ARTS PRINTING OPERATION CONSISTING OF ONE MAN ROLAND MODEL ROTOMAN N 38" WIDE 5-COLOR HEATSET OFFSET LITHOGRAPHIC PRINTING PRESS (PRESS #524) WITH ONE 4.587 MMBTU/HR NATURAL GAS FIRED THERMO WISCONSIN MODEL APOLLO A3100 DRYING OVEN SERVED BY THE SHARED 5.728 MMBTU/HR MEGTEC CLEANSWITCH MODEL CS-300-95 NATURAL GAS FIRED REGENERATIVE THERMAL OXIDIZER: DECREASE DAILY VOC LIMIT FROM 50.1 TO 27.5 LB/DAY.

### CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The drying oven and thermal oxidizer shall be fired exclusively on natural gas. [District NSR Rule] Federally Enforceable Through Title V Permit
5. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of natural gas combusted in the drying oven shall be installed, utilized and maintained. [District Rule 2201] Federally Enforceable Through Title V Permit

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**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 / APCO

  
DAVID WARNER, Director of Permit Services  
N-1646-39-5 Jan 30 2013 3:55PM - HEINENG : Joint Inspection NOT Required

6. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of natural gas combusted in the thermal oxidizer shall be installed, utilized and maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The drying ovens serving the heatset offset printing press shall be maintained under negative pressure and shall be vented through the thermal oxidizer at all times except during periods of start-up while the dryers are being air purged. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap, roof overhang, or any other obstruction. [District Rule 4102]
9. The collection system for the dryer exhausts and for all fugitive VOC emissions shall have a minimum capture efficiency of 90%. [District NSR Rule and 4607, 5.6] Federally Enforceable Through Title V Permit
10. The thermal oxidizer shall be operated with a minimum VOC destruction efficiency of 98%. [District NSR Rule and 4607, 5.6] Federally Enforceable Through Title V Permit
11. The thermal oxidizer shall be operated at a minimum temp. of 1400 deg. F. The incinerator shall be preheated to 1400 deg. F prior to the start-up of the heatset offset printing operation. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The thermal oxidizer shall be equipped with an operational continuous temperature monitoring and recording instrument. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The VOC content of organic solvents used to perform surface preparation or cleanup shall not exceed the VOC content limits specified in Table 7 of Rule 4607 (Graphic Arts and Paper, Film, Foil, and Fabric Coatings - 12/18/08 version). [District Rule 4607, 5.8.1] Federally Enforceable Through Title V Permit
14. For a permittee using any solvent containing more than 25 g/L (0.21 lb/gal) 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 which 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, 5.8.3] Federally Enforceable Through Title V Permit
15. For a permittee using any solvent containing more than 25 g/L (0.21 lb/gal) of VOC for organic solvent cleaning, solvent shall not be atomized into the open air unless it is vented to a VOC control device. This provision shall not apply to operations where roller or blanket wash is applied automatically and the cleaning of the nozzle tips of automated spray equipment systems, except for robotic systems, and cleaning with nonpropellant-induced, hand-held spray bottles or containers which solvents are dispensed without a propellant-induced force. [District Rule 4607, 5.8.4] Federally Enforceable Through Title V Permit
16. For a permittee using any solvent containing more than 25 g/L (0.21 lb/gal) of VOC for organic solvent cleaning, the permittee shall not use VOC-containing material to clean spray equipment used for the application of coatings, adhesives, or ink, unless an enclosed system or equipment that is proven to be equally effective at controlling emissions is used for cleaning. If an enclosed system is used, it must totally enclose spray guns, cups, nozzles, bowls, and other parts during washing, rinsing, draining procedures, and it must be used according to manufacturer's recommendations and must be closed when not in use. [District Rule 4607, 5.8.5] Federally Enforceable Through Title V Permit
17. Permittee shall store or dispose of fresh or 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 the contents of the containers or when the container is empty. [District Rule 4607, 5.9] Federally Enforceable Through Title V Permit

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18. The permittee shall properly use and operate all graphic arts printing technologies as directed and/or specified by the manufacturer of the printer or graphic arts material. [District Rule 4607, 5.10] Federally Enforceable Through Title V Permit
19. The VOC content of the materials shall not exceed the following: inks less than 45% VOC by weight (less water and exempt compounds) and fountain solutions less than 15% by volume. [District NSR Rule] Federally Enforceable Through Title V Permit
20. VOC emissions from the printing inks and solvents shall not exceed 27.5 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
21. NO<sub>x</sub> emissions from the drying oven shall not exceed 4.3 ppmvd @ 19% O<sub>2</sub> (referenced as NO<sub>2</sub>). [District Rule 2201] Federally Enforceable Through Title V Permit
22. CO emissions from the drying oven shall not exceed 25.0 ppmvd @ 19% O<sub>2</sub>. [District Rule 2201] Federally Enforceable Through Title V Permit
23. Emissions from the drying oven shall not exceed any of the following limits: 0.00285 lb-SO<sub>x</sub>/MMBtu, 0.0076 lb-PM<sub>10</sub>/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
24. NO<sub>x</sub> emissions from the regenerative thermal oxidizer shall not exceed 4.3 ppmvd @ 19% O<sub>2</sub> (referenced as NO<sub>2</sub>). [District Rule 2201] Federally Enforceable Through Title V Permit
25. CO emissions from the regenerative thermal oxidizer shall not exceed 25.0 ppmvd @ 19% O<sub>2</sub>. [District Rule 2201] Federally Enforceable Through Title V Permit
26. Emissions from the regenerative thermal oxidizer shall not exceed any of the following limits: 0.00285 lb-SO<sub>x</sub>/MMBtu, 0.0076 lb-PM<sub>10</sub>/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
27. The total quantity of natural gas used in the drying oven under this permit unit shall not exceed 11,651 million cubic feet in any one calendar year. [District Rule 2201] Federally Enforceable Through Title V Permit
28. The total quantity of natural gas used in the thermal oxidizer shall not exceed 25,000 million cubic feet in any one calendar year. [District Rule 2201] Federally Enforceable Through Title V Permit
29. Source testing to demonstrate compliance with the VOC destruction efficiency of each regenerative thermal oxidizer shall be conducted on an annual basis. [District Rule 2201] Federally Enforceable Through Title V Permit
30. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081, 7.1] Federally Enforceable Through Title V Permit
31. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081, 7.3] Federally Enforceable Through Title V Permit
32. Source testing to determine the destruction efficiency of each regenerative thermal oxidizer shall be conducted using EPA Methods 2, 2A, or 2D for measuring flow rates and EPA Methods 25, 25A, or 25C for measuring total gaseous organic concentrations at the inlet and outlet of the control device. [District Rule 4607, 6.4.7] Federally Enforceable Through Title V Permit
33. Permittee shall maintain a current file of coatings, inks, adhesives, fountain solutions, wash primers, and solvents in use and in storage. The file shall include material safety data sheet (MSDS) or product data sheet showing the material name, manufacturer's name, VOC content as applied, mixing instruction, and density. [District Rule 4607, 6.1.1] Federally Enforceable Through Title V Permit
34. The permittee shall record on a daily basis, the type and amount of each coating, adhesive, fountain solution, wash primer, and solvent used. [District Rule 4607, 6.1.3] Federally Enforceable Through Title V Permit
35. The permittee shall record on a monthly basis, the type and amount of all inks used and their VOC content and densities, using one of the methods listed in Rule 4607, Section 6.1.2.1 (12/18/08 version of Rule 4607). [District Rule 4607, 6.1.2.1] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

36. The permittee shall record on a monthly basis, the type and amount of each ink, coating, adhesive, wash primer, and solvent used. [District Rule 4607, 6.1.2.2] Federally Enforceable Through Title V Permit
37. The permittee shall record on a monthly basis, the type, amount and percent VOC by volume of each fountain solution used. [District Rule 4607, 6.1.2.3] Federally Enforceable Through Title V Permit
38. The permittee shall maintain daily records of the following: (1). Quantity of VOC emitted (in pounds) from this printing press; (2). Cumulative quantity of VOC emitted (in pounds) from all graphic arts printing operations at the facility; (3) Quantity of natural gas used (in cubic feet) by each drying oven and each thermal oxidizer at the facility; (4) Operational temperature of the regenerative thermal oxidizer. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
39. The permittee shall maintain a record of the cumulative annual quantity of natural gas used (in cubic feet) by the drying oven and thermal oxidizer under this permit. The cumulative total quantity of natural gas used shall be updated monthly. [District NSR Rule] Federally Enforceable Through Title V Permit
40. All records shall be maintained and retained on-site for a minimum of five years, and shall be made available for District inspection upon request. [District Rules 1070, 2520, and 4607] Federally Enforceable Through Title V Permit
41. The regenerative thermal oxidizer shall be operated at a minimum temp. of 1400 deg. F. The regenerative thermal oxidizer shall be preheated to 1400 deg. F prior to the start-up of the heatset offset printing operation. [District Rules 2201 and 2520 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
42. The regenerative thermal incinerator shall be equipped with a continuous temperature monitoring and recording instrument. [District Rules 2201 and 2520 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
43. The regenerative thermal oxidizer shall be operated at a minimum temp. of 1400 deg. F. Upon determining an excursion from this requirement, the permittee shall investigate the excursion and take corrective action to minimize emissions and prevent recurrence of the excursion as expeditiously as practicable. [District Rule 2520 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
44. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR part 64.7. [40 CFR part 64] Federally Enforceable Through Title V Permit
45. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR part 64.9. [40 CFR part 64] Federally Enforceable Through Title V Permit
46. If the District or EPA determine that a Quality improvement plan is required under 40 CFR part 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64.8. [40 CFR Part 64] Federally Enforceable Through Title V Permit