



San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT



HEALTHY AIR LIVING™

JUN 27 2013

Richard Sanchez
Label Technology, Inc.
2050 Wardrobe Avenue
Merced, CA 94340

RE: Final – Authority to Construct/Certificate of Conformity (Minor Mod)
Facility Number: N-3852
Project Number: N-1130482

Dear Mr. Sanchez:

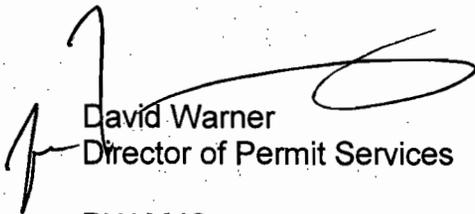
The Air Pollution Control Officer has issued the Authority to Construct permit to Label Technology, Inc. for increases in the daily and annual VOC emission limits for a laminator, at 2050 Wardrobe Avenue in Merced, CA.

Enclosed is a copy of the Authority to Construct permit and a copy of the invoice for the engineering evaluation fees pursuant to District Rule 3010. The District's analysis of the proposal was sent to US EPA Region IX on May 22, 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. Rupi Gill at (209) 557-6400.

Sincerely,



David Warner
Director of Permit Services

DW:MJS

Enclosures

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

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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

AUTHORITY TO CONSTRUCT

PERMIT NO: N-3852-17-2

ISSUANCE DATE: 06/24/2013

LEGAL OWNER OR OPERATOR: LABEL TECHNOLOGY, INC.

MAILING ADDRESS: 2050 WARDROBE AVE
MERCED, CA 95340

LOCATION: 2050 WARDROBE AVE
MERCED, CA 95340

EQUIPMENT DESCRIPTION:

GRAPHIC ARTS OPERATION CONSISTING OF A 30 INCH DRI-TEC LAMINATOR (LAMINATOR IS EQUIPPED WITH A PERMIT EXEMPT NATURAL GAS FIRED HEATING UNIT (RULE 2020 SECTION 6.6.1)). MODIFICATION TO INCREASE THE DAILY AND ANNUAL EMISSION LIMITS.

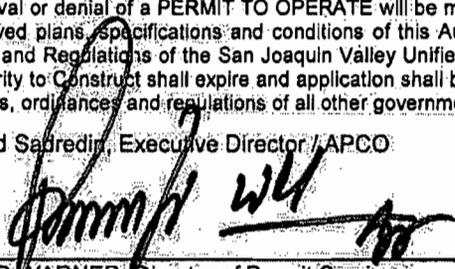
CONDITIONS

1. This Authority to Construct permit 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 the modifications authorized by this Authority to Construct permit, the facility shall submit an application for an Administrative Amendment to its Title V permit. [District Rule 2201] Federally Enforceable Through Title V Permit
3. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. The facility-wide VOC emissions, on a rolling 12-month basis, shall be less than 50,000 pounds. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The VOC emissions from this unit shall not exceed 2.7 pounds during any one day. [District Rule 2201]
6. The VOC emissions from this unit, on a rolling 12-month basis, shall not exceed 454 pounds. [District Rule 2201]
7. The VOC emissions from this unit shall be calculated assuming that all VOC's applied are emitted. [District Rule 2201]

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.

Sayed Sabredin, Executive Director / APCD



DAVID WARNER, Director of Permit Services

N-3852-17-2 Jun 24 2013 3:32PM - SCHOHOM - Joint Inspection NOT Required

8. The facility-wide emissions of hazardous air pollutants (HAPs) shall not exceed 10 tons in any rolling 12-month period of any single HAP (as defined in 40 CFR 63.2) and 25 tons in any rolling 12-month period of any combination of HAPs. [District Rule 4002 and 40 CFR Part 63 Subpart KK] Federally Enforceable Through Title V Permit
9. The VOC content of graphic arts materials shall not exceed any of the following limits: inks for porous substrates; 225 g/l (1.88 lb/gal), all other inks; 300 g/l (2.5 lb/gal), coatings; 300 g/l (2.5 lb/gal), adhesives; 150 g/l (1.25 lb/gal). These VOC content limits are in g/l or lb/gal less water and exempt compounds, as applied. [District Rule 4607] Federally Enforceable Through Title V Permit
10. The VOC content of specialty inks shall not exceed 300 g/l (2.5 lb/gal) less water and exempt compounds, as applied. [District Rule 4607] Federally Enforceable Through Title V Permit
11. The use of specialty inks, as defined in District Rule 4607, shall not exceed 2 gallons in a calendar day and 120 gallons in a calendar year. [District Rule 4607] Federally Enforceable Through Title V Permit
12. Except during the cleaning of specialty ink application equipment, the VOC content of solvents shall not exceed 25 g/l (0.21 lb/gal). [District Rule 4607] Federally Enforceable Through Title V Permit
13. If using solvents with VOC contents in excess of 25 g/l (0.21 lb/gal) to clean specialty ink application equipment, cleaning shall be performed utilizing only the following methods: (1) wipe cleaning or, (2) application of solvent from hand-held bottles from which solvents are dispensed without a propellant-induced force or, (3) non-atomized solvent flow method in which the cleaning solvent is collected in a container or a collection system that is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container or, (4) solvent flushing method in which the cleaning solvent is discharged into a container that is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container. The discharged solvent from the equipment must be collected into containers without atomizing it 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
14. Solvent shall not be atomized into the open air unless it is vented to a VOC control device that complies with section 5.6 of District Rule 4607. This provision shall not apply to printing operations where roller or blanket wash is applied automatically and the cleaning of nozzle tips of automated spray equipment systems, except for robotic systems, and cleaning with spray bottles or containers from which the solvents are dispensed with a propellant-induced force. [District Rule 4607] Federally Enforceable Through Title V Permit
15. The operator shall store and dispose of fresh and spent solvents, waste solvent cleaning materials, coatings, adhesives, catalysts, thinners and inks in closed, non-absorbent, non-leaking, self closing containers. The containers shall remain closed at all times except when depositing or removing their contents or when they are empty. [District Rules 4607 and 4653] Federally Enforceable Through Title V Permit
16. The operator shall keep mixing containers for VOC-containing adhesives and process-related waste materials closed at all times except when depositing or removing these materials. [District Rule 4653] Federally Enforceable Through Title V Permit
17. The operator shall minimize spills of VOC containing adhesive products and process-related waste. [District Rule 4653] Federally Enforceable Through Title V Permit
18. The operator shall convey VOC containing adhesive products and process-related waste materials from one location to another in closed containers or pipes. [District Rule 4653] Federally Enforceable Through Title V Permit
19. Coatings shall be applied utilizing only the following types of equipment (as defined in Rule 4607): flow coaters, roll coaters, dip coaters, foam coaters, die coaters and hand applicators. [District Rules 2201 and 4607] Federally Enforceable Through Title V Permit
20. The operator shall properly use and properly 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
21. The operator shall maintain a current file documenting the coatings, inks, adhesives, fountain solutions, wash primers and solvents in use and in storage. The file shall include a material safety data sheet or product data sheet showing the material name, manufacturer's name, VOC content as applied, specific mixing instructions and density. [District Rule 4607] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

22. The operator shall record, on a monthly basis, the type and amount of all inks used according to one of the following methods; (1) group the quantity of all inks used and identify the maximum VOC content and use the maximum density of 1,010 g/l (8.44 lb/gal), (2) report process inks and pantone inks separately and use specific VOC content and density values for each process ink, and the highest VOC content and the maximum density of 1,010 g/l (8.44 lb/gal) for pantone inks or, (3) report process inks and pantone inks separately and use the maximum VOC content and minimum density value for both process and pantone inks, or use the density of 1,010 g/l (8.44 lb/gal) for pantone inks or, (4) itemize each ink and pantone ink and use the specific VOC content and density value for each. [District Rule 4607] Federally Enforceable Through Title V Permit
23. The operator shall record, on a monthly basis, the type and amount of each coating, adhesive, wash primer and solvent (including cleaning solvents) used. [District Rule 4607] Federally Enforceable Through Title V Permit
24. The operator 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
25. The operator shall record, on a daily basis, the type and amount of each specialty ink (as defined in Rule 4607) used. [District Rule 4607] Federally Enforceable Through Title V Permit
26. A record of the facility-wide VOC emissions, on a rolling 12-month basis, shall be kept. The records shall be updated at least monthly. [District Rule 2201] Federally Enforceable Through Title V Permit
27. A record of the daily VOC emissions from this unit shall be kept. [District Rule 2201]
28. A record of the VOC emissions from this unit, on a rolling 12-month basis, shall be kept. The records shall be updated at least monthly. [District Rule 2201]
29. The operator shall maintain records of the emissions of each individual HAP and of the combined HAP emissions. The records shall be kept on a rolling 12-month basis and shall be updated at least monthly. District approved estimating techniques shall be used to determine the HAP emissions. The monthly records shall include records of all required measurements and calculations necessary to demonstrate compliance, including the mass of all HAP containing materials used and the mass fraction of each HAP present in each HAP containing material. [District Rule 4002 and 40 CFR Part 63 Subpart KK] Federally Enforceable Through Title V Permit
30. All records shall be maintained for a period of at least five years and shall be made available to the District, ARB and EPA upon request. [District Rules 2201 and 4607] Federally Enforceable Through Title V Permit