San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

OCT 19 2011

Ron Crookham
Dart Container Corporation
1400 E Victor Road
Lodi, CA 95240

Re: Proposed Authority to Construct / Certificate of Conformity (Minor Mod)
District Facility # N-257
Project # N-1110917

Dear Mr. Crookham:

Enclosed for your review is the District's analysis of your application for Authority to Construct for the facility identified above. You have requested that a Certificate of Conformity with the procedural requirements of 40 CFR Part 70 be issued with this project. The applicant is proposing to install a graphic arts operation consisting of 12 flexographic offset/lithographic printing presses.

After addressing any EPA comments made during the 45-day comment period, the Authority to Construct will be issued to the facility with a Certificate of Conformity. Prior to operating with modifications authorized by the Authority to Construct, the facility must submit an application to modify the Title V permit as an administrative amendment, in accordance with District Rule 2520, Section 11.5.

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

Thank you for your cooperation in this matter.

Sincerely,

David Warner
Director of Permit Services

DW:JH/st

Enclosures

Seyed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
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Central Region (Main Office)
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San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

OCT 19 2011

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

Re: **Proposed Authority to Construct / Certificate of Conformity (Minor Mod)**
District Facility # N-257
Project # N-1110917

Dear Mr. Rios:

Enclosed for your review is the District's engineering evaluation of an application for Authority to Construct for Dart Container Corporation, located at 1400 Victor Road in Lodi, CA, which has been issued a Title V permit. Dart Container Corporation is requesting that a Certificate of Conformity, with the procedural requirements of 40 CFR Part 70, be issued with this project. The applicant is proposing to install a graphic arts operation consisting of 12 flexographic offset/lithographic printing presses.

Enclosed is the engineering evaluation of this application, a copy of the current Title V permit, and proposed Authority to Construct # N-257-7-0 with Certificate of Conformity. After demonstrating compliance with the Authority to Construct, the conditions will be incorporated into the facility's Title V permit through an administrative amendment.

Please submit your written comments on this project within the 45-day comment period that begins on the date you receive this letter. If you have any questions, please contact Mr. Rupi Gill, Permit Services Manager, at (209) 557-6400.

Thank you for your cooperation in this matter.

Sincerely,

David Warner
Director of Permit Services

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San Joaquin Valley Air Pollution Control District
Authority to Construct
Application Review
Flexographic and Offset Lithographic Printing Operation

Facility Name:	Dart Container Corporation	Date:	September 16, 2011
Mailing Address:	1400 Victor Road Lodi, CA 95240	Engineer:	James Harader
		Lead Engineer:	Nick Peirce
Contact Person:	Ron Crookham		
Telephone:	(209) 333-8088 ext. 5202		
Application #:	N-257-7-0		
Project #:	N-1110917		
Complete:	June 6, 2011		

I. Proposal

Dart Container Corporation (Dart) has submitted an Authority to Construct application for a polystyrene cup printing operation. The cup printing operation consists of 12 non-heatset flexographic/offset lithographic printers that only use ultra-violet (UV) curable inks. These printing presses were all installed between 1993 and 2004. Permits have been required for graphic arts operations since at least 1991 (San Joaquin County Rule 202 – Exemptions 9/19/1991); therefore, these units do not qualify for in-house Permits to Operate. Subsequently, the District will issue an Authority to Construct permit for these units.

Dart currently has a TV permit. This modification can be classified as a Title V minor modification pursuant to Rule 2520, Section 3.20, and can be processed with a Certificate of Conformity (COC). Since the facility has specifically requested that this project be processed in that manner, the 45-day EPA comment period will be satisfied prior to the issuance of the Authority to Construct.

II. Applicable Rules

Rule 2201	New and Modified Stationary Source Review Rule (4/21/11)
Rule 2520	Federally Mandated Operating Permits (6/21/01)
Rule 4001	New Source Performance Standards (4/14/99)
Rule 4002	National Emission Standards for Hazardous Air Pollutants (5/20/04)
Rule 4101	Visible Emissions (2/17/05)
Rule 4102	Nuisance (12/17/92)
Rule 4607	Graphic Arts and Paper, Film, Foil, and Fabric Coatings (12/18/08)
CH&SC 41700	Health Risk Assessment
CH&SC 42301.6	School Notice

Public Resources Code 21000-21177: California Environmental Quality Act (CEQA)
California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387: CEQA Guidelines

III. Project Location

This equipment is located at 1400 E. Victor Road in Lodi, CA. The District has verified that the equipment is not located within 1,000 feet of the outer boundary of a K-12 school. Therefore, the public notification requirement of California Health and Safety Code 42301.6 is not applicable to this project.

IV. Process Description

This facility manufactures polystyrene cups. These printers are used to print high-end graphics onto the polystyrene cups.

V. Equipment Listing

N-257-7-0: GRAPHIC ARTS PRINTING OPERATION CONSISTING OF FOUR DART MODEL 250 AND EIGHT DART MODEL 200 FLEXOGRAPHIC/OFFSET LITHOGRAPHIC PRINTERS

VI. Emission Control Technology Evaluation

These printers will only emit volatile organic compunds (VOCs). To minimize VOC emissions, the applicant is proposing to utilize UV curable inks.

VII. General Calculations

A. Assumptions

1. VOC is the only pollutant emitted by the printers.

The applicant has proposed the following ink usage rate for each of the 12 printers.

Material	Proposed Usage Rate - Per Printer (pounds/day)
UV Ink	15

B. Emission Factors

Dart has proposed a maximum coating and material content of 0.3% VOC for the UV curable inks that will be used by these units.

C. Calculations

1. Pre-Project Emissions (PE1)

Since this is a newly permitted operation, PE1 = 0.

2. Post Project PE (PE2)

The following formula will be used to calculate the daily VOC emissions from each printing press.

Daily VOC = Proposed Usage (lb/day) x VOC Content (% by weight) ÷ 100

Material	Proposed Usage (lb/day)	VOC Content (% by weight)	PE2 VOC (lb/day)
UV Ink	15	0.3	**0.0** (0.045 lb/day rounds to zero per District Policy)

The following formula will be used to calculate the annual VOC emissions from each printing press.

Annual VOC = Proposed Usage (lb/day) x 365 days/year
x VOC Content (% by weight) ÷ 100

Material	Proposed Usage (lb/year)	VOC Content (% by weight)	PE2 VOC (lb/year)
UV Ink	5,475	0.3	**16**

The above calculations determined the total daily and annual emissions for each emission unit. The following calculations determine the combined daily and annual emissions from the 12 printing presses.

Total Combined Daily Emissions = 12 printing presses x 0.045 lb-VOC/day
Total Combined Daily Emissions = 0.5 lb-VOC/day

Total Combined Annual Emissions = 12 printing presses x 16 lb-VOC/year
Total Combined Annual Emissions = 192 lb-VOC/year

3. Pre-Project Stationary Source Potential to Emit (SSPE1)

Pursuant to District Rule 2201, the Pre-Project Stationary Source Potential to Emit (SSPE1) is the Potential to Emit (PE) from all units with valid ATCs or PTOs at the Stationary Source and the quantity of Emission Reduction Credits (ERCs) which have been banked since September 19, 1991 for Actual Emissions Reductions that have occurred at the source, and which have not been used on-site.

The following emissions information was obtained from the engineering evaluations for District Projects N-1093342 and N-1101503. Since the proposed units only emit VOCs, only VOC emission values are presented in the table.

Stationary Source Pre-Project Potential to Emit (SSPE1)	
Permit Number	**Pollutants (lb/yr)**
	VOC
N-257-2-4	58,802
N-257-4-5	539
N-257-5-5	1,079
N-257-6-1	186,953
ERC	0
SSPE1	**247,373**

4. Post Project Stationary Source Potential to Emit (SSPE2)

Pursuant to District Rule 2201, the Post Project Stationary Source Potential to Emit (SSPE2) is the Potential to Emit (PE) from all units with valid ATCs or PTOs, except for emissions units proposed to be shut down as part of the Stationary Project, at the Stationary Source and the quantity of Emission Reduction Credits (ERCs) which have been banked since September 19, 1991 for Actual Emissions Reductions that have occurred at the source, and which have not been used on-site.

Stationary Source Post-Project Potential to Emit (SSPE2)	
Permit Number	**Pollutants (lb/yr)**
	VOC
N-257-2-4	58,802
N-257-4-5	539
N-257-5-5	1,079
N-257-6-1	186,953
N-257-7-0	***192***
ERC	0
SSPE2	**247,565**

5. Major Source Determination

Pursuant to District Rule 2201, a Major Source is a stationary source with post project emissions or a Post Project Stationary Source Potential to Emit (SSPE2), equal to or exceeding one or more of the following threshold values. For the purposes of determining major source status, the SSPE2 does not include the quantity of emission reduction credits (ERC) which have been banked since September 19, 1991 for Actual Emissions Reductions that have occurred at the source, and which have not been used on-site.

Major Source Determination					
Pollutant	**SSPE1 (lb/yr)**	**SSPE2 (lb/yr)**	**Major Source Threshold (lb/yr)**	**Existing Major Source?**	**Becoming a Major Source?**
VOC	247,373	247,565	20,000	Yes	No

6. Baseline Emissions (BE)

BE = Pre-project Potential to Emit for:

- Any unit located at a non-Major Source,
- Any Highly-Utilized Emissions Unit, located at a Major Source,
- Any Fully-Offset Emissions Unit, located at a Major Source, or
- Any Clean Emissions Unit, located at a Major Source.

otherwise,

BE = Historic Actual Emissions (HAE), calculated pursuant to Section 3.22

Since this project only includes new emission units, BE = PE1 = 0 for all criteria pollutants.

7. SB288 Modification

The SB288 Modification Trigger thresholds for each pollutant are taken from District Rule 2201 and shown in the table below.

SB288 Modification Thresholds	
Pollutant	Threshold (Pounds Per Year)
VOC	50,000
NOx	50,000
PM10	30,000
SOx	80,000

The units in this project will emit VOC's and the facility is a major source for VOC emissions. Therefore, this proposal could potentially trigger a SB288 modification for VOC emissions. The SB288 Modification threshold for VOC emissions is 50,000 lb/year.

The Net Emissions Increase (NEI) for an SB288 Modification is calculated as follows for new units:

NEI = PE2 – 0

Since the sum of PE2 for the proposed units is 192 lb-VOC/year, the highest NEI possible is 192 lb-VOC/year. Therefore, the NEI cannot possibly exceed the SB288 modification threshold of 50,000 lb-VOC/year and an SB288 modification is not triggered.

8. Federal Major Modification

The units in this project will emit VOC's and the facility is a major source for VOC emissions. Therefore, this proposal could potentially trigger a Federal Major Modification for VOC emissions. The Federal Major Modification threshold for VOC emissions is 0 lb/year.

The Net Emissions Increase (NEI) for a Federal Major Modification may be calculated as follows for new units:

NEI = PE2 – 0

Pursuant to the District's draft Rule 2201 Major Modification Policy, calculated emission increases that are less than or equal to 0.5 lb/day, per permit unit, are rounded to 0 (consistent with District Policy APR-1130 Increases Maximum Daily Permitted Emissions Less Than or Equal to 0.5 lb/day). Since the combined post-project potential to emit for the proposed equipment is equal to 0.5 lb/day, the emission increase may be rounded to 0. Thus,

NEI = 0 – 0 = 0

Therefore, this project does not trigger a Federal Major Modification.

9. Quarterly Net Emissions Change (QNEC)

The QNEC is calculated solely to establish emissions that are used to complete the District's PAS emissions profile screen. Detailed QNEC calculations are included in Appendix III.

VIII. Compliance

Rule 2201 New and Modified Stationary Source Review Rule

A. Best Available Control Technology (BACT)

1. BACT Applicability

BACT requirements are triggered on a pollutant-by-pollutant basis and on an emissions unit-by-emissions unit basis for the following*:

a) Any new emissions unit with a potential to emit exceeding two pounds per day,
b) The relocation from one Stationary Source to another of an existing emissions unit with a potential to emit exceeding two pounds per day,
c) Modifications to an existing emissions unit with a valid Permit to Operate resulting in an AIPE exceeding two pounds per day, and/or
d) Any new or modified emissions unit, in a stationary source project, which results in a Major Modification.

*Except for CO emissions from a new or modified emissions unit at a Stationary Source with an SSPE2 of less than 200,000 pounds per year of CO.

a. New emissions units – PE > 2 lb/day

The daily emissions from each printing press are compared to the BACT trigger threshold in the below table. Only VOC's are emitted by the printing presses.

New Emissions Unit BACT Applicability				
Pollutant	Daily Emissions (per printing press)	BACT Threshold (lb/day)	SSPE2 (lb/yr)	BACT Triggered?
VOC	0.0	> 2.0	n/a	No

As shown above, BACT is not triggered by this proposal

B. Offsets

1. Offset Applicability

Pursuant to Section 4.5.3, offset requirements are triggered on a pollutant-by-pollutant basis. Unless exempted pursuant to Section 4.6, offset requirements are triggered if the post-project potential to emit (SSPE2) equals or exceeds the offset threshold levels listed in the following table.

Offsets Applicability			
Pollutant	SSPE2 (lb/yr)	Offset Threshold Levels (lb/yr)	Offsets Triggered?
VOC	247,565	20,000	**Yes**

2. Quantity of Offsets Required

As shown in the previous table, offsets are triggered. The quantity of offsets required is calculated using the following equation:

Offsets Required = (PE2 – BE + ICCE) x DOR, where

PE2 = Post Project Potential to Emit
BE = Annual Baseline Emissions (zero for this unit)
ICCE = Increase in Cargo Carrier Emissions (zero for this unit)
DOR = Distance Offset Ratio, determined pursuant to Section 4.8

Thus, the equation can be reduced to:

Offsets Required = $\sum(PE2_{VOC})$ x DOR

Pursuant to District Policy APR 1130, emission increases that are less than or equal to 0.5 lb/day, per permit unit, are rounded to 0 for the purposes of determining whether New and Modified Source Review (NSR) requirements are triggered. Since the combined post-project potential to emit for the proposed equipment is equal to 0.5 lb/day, the emission increase (PE2 for new units) may be rounded to 0. Thus, PE2 is equal to zero and no offsets are required.

C. Public Notification

1. Applicability

Public noticing is required for:
a. New Major Sources, which is a new facility that is also a Major Source,
b. Major Modifications,
c. Any new emissions unit with a Potential to Emit greater than 100 pounds during any one day for any one pollutant,
d. Any project which results in the offset thresholds being surpassed, and/or
e. Any project with an SSIPE of greater than 20,000 lb/year for any pollutant.

a. New Major Source

As demonstrated previously in this document, this project will not cause this facility to become a new Major Source.

b. Major Modification

As demonstrated previously in this document, this project does not constitute a SB288 or Federal Major Modification.

c. PE > 100 lb/day

The Daily PE for each new emission unit was determined to be less than the 100 lb/day threshold.

d. Offset Threshold

The following table compares the SSPE1 and SSPE2 to the offset thresholds in order to determine if this proposal will result in emissions surpassing the offset threshold.

Offset Threshold				
Pollutant	SSPE1 (lb/yr)	SSPE2 (lb/yr)	Offset Threshold (lb/yr)	Public Notice Required?
VOC	247,373	247,565	20,000	No

As detailed in the preceding table, emissions from this facility are already above the offset threshold; thus, the offset threshold will not be surpassed.

e. SSIPE > 20,000 lb/year

Public notification is required for any permitting action that results in a Stationary Source Increase in Permitted Emissions (SSIPE) of more than 20,000 lb/year of any affected pollutant. According to District policy, the SSIPE is calculated as the Post Project Stationary Source Potential to Emit (SSPE2) minus the Pre-Project Stationary Source Potential to Emit (SSPE1), i.e. SSIPE = SSPE2 – SSPE1.

SSIPE Public Notice Threshold					
Pollutant	SSPE2 (lb/yr)	SSPE1 (lb/yr)	SSIPE (lb/yr)	SSIPE Threshold (lb/yr)	Public Notice Required?
VOC	247,565	247,373	192	20,000	No

As detailed in the preceding table, this project does not result in an increase in emissions that surpasses the SSIPE threshold.

2. Public Notice Action

As discussed above, this project will not result in emissions, for any criteria pollutant, which would subject the project to any of the noticing requirements listed above. Therefore, a public notice will not be required for this project.

D. Daily Emissions Limits

Daily Emissions Limitations (DELs) and other enforceable conditions are required by Section 3.15 to restrict a unit's maximum daily emissions, to a level at or below the emissions associated with the maximum design capacity. The following conditions will be included on the ATC permit:

- *The quantity of UV ink used by each printing press shall not exceed 15 pounds in any one day. [District Rule 2201]*
- *The VOC content of the UV inks used in this graphic arts operation shall not exceed 0.3% by weight. [District Rule 2201]*

E. Compliance Assurance

1. Source Testing

Source testing is not necessary to verify emissions from this operation.

2. Monitoring

No monitoring is required to demonstrate compliance with Rule 2201.

3. Recordkeeping

The following recordkeeping requirements will be included on the ATC permit:

- *Permittee shall keep a daily record of the quantity of UV ink used by each printing press, in lb. [District Rule 2201]*
- *Permittee shall maintain a current file that includes a material safety data sheet (MSDS) or product data sheet for each ink used that includes the material name, manufacturer's name, the VOC content, less water and exempt compounds and as applied, the specific mixing instructions, and the density. [District Rules 2201 and 4607]*
- *All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070, 2201, and 4607]*

4. Reporting

No reporting is required to ensure compliance with Rule 2201.

Rule 2520 Federally Mandated Operating Permits

Dart is a Major Source facility and currently has a Title V permit. Therefore, this rule is applicable to this facility. The District has determined that the proposed project constitutes a Minor Modification to the Title V permit.

As discussed earlier, the facility has applied for a Certificate of Conformity (COC); therefore, the facility must apply to modify their Title V permit with an administrative amendment, prior to operating with the proposed modifications. Continued compliance with this rule is expected. The following conditions will be included on the ATC permit:

- *{1830} 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 NSR Rule]*

- *{1831} 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]*

Rule 4001 New Source Performance Standards (NSPS)

There are no New Source Performance Standards that apply to this type of graphic arts operation.

Rule 4002 National Emission Standards for Hazardous Air Pollutants

There are no New Source Performance Standards that apply to this type of graphic arts operation.

Rule 4101 Visible Emissions

Rule 4101 states that no air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. Therefore, the following condition will be listed on the ATC:

- *{15} No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]*

- *{15} No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]*

Rule 4102 Nuisance

Rule 4102 states that no air contaminant shall be released into the atmosphere which causes a public nuisance. Public nuisance conditions are not expected as a result of these operations provided the equipment is well maintained. Therefore, the following condition will be listed on the ATC to ensure compliance:

- *{98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]*

California Health & Safety Code 41700 (Health Risk Assessment)

District Policy APR 1905 - Risk Management Policy for Permitting New and Modified Sources (dated 3/2/01) specifies that for an increase in emissions associated with a proposed new source or modification, the District perform an analysis to determine the possible impact to the nearest resident or worksite. The results of the analysis are shown below. Please refer to Appendix II for further details.

Categories	12 Flexographic/Offset Lithographic Printers (unit 7-0)	Project Totals	Facility Totals
Prioritization Score	0.00*	0.00	N/A
Acute Hazard Index	N/A	N/A	N/A
Chronic Hazard Index	N/A	N/A	N/A
Maximum Individual Cancer Risk (10^{-6})	N/A	N/A	N/A
T-BACT Required?	**No**		
Special Permit Conditions?	**No**		

* A prioritization was not performed after a review of MSDS sheets. No further analysis was required.

Rule 4607 Graphic Arts and Paper, Film, Foil, and Fabric Coatings

This rule is applicable to any graphic arts printing operation. Section 4.1.2 states that the requirements of this rule, except the recordkeeping requirements of Section 6.1, do not apply to graphic arts printing operations that emit less than 200 pounds of VOC per 12 rolling consecutive calendar months. Based on the daily usage limit and the VOC content limit of the inks, the 12-month emission rate was calculated to be 192 lb-VOC/year. This is the only graphic arts operation at this facility; therefore, this operation qualifies for the exemption listed in Section 4.1.2.

- *Permittee shall maintain a current file that includes a material safety data sheet (MSDS) or product data sheet for each ink used that includes the material name, manufacturer's name, the VOC content, less water and exempt compounds and as applied, the specific mixing instructions, and the density. [District Rules 2201 and 4607]*

The records must be kept for a minimum of five years. The following condition will be included on the ATC permit:

- *All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070, 2201, and 4607]*

California Health & Safety Code 42301.6 (School Notice)

The District has verified that this site is not located within 1,000 feet of a k-12 school. Therefore, pursuant to California Health and Safety Code 42301.6, a school notice is not required.

California Environmental Quality Act (CEQA)

The California Environmental Quality Act (CEQA) requires each public agency to adopt objectives, criteria, and specific procedures consistent with CEQA Statutes and the CEQA Guidelines for administering its responsibilities under CEQA, including the orderly evaluation of projects and preparation of environmental documents. The San Joaquin Valley Unified Air Pollution Control District (District) adopted its *Environmental Review Guidelines* (ERG) in 2001. The basic purposes of CEQA are to:

- Inform governmental decision-makers and the public about the potential, significant environmental effects of proposed activities;
- Identify the ways that environmental damage can be avoided or significantly reduced;
- Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible; and
- Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

The District performed an Engineering Evaluation (this document) for the proposed project and determined that all project specific emission unit(s) are exempt from Best Available Control Technology (BACT) requirements. Furthermore, the District conducted a Risk Management Review and concludes that potential health impacts are less than significant.

Issuance of permits for emissions units not subject to BACT requirements and with health impact less than significant is a matter of ensuring conformity with applicable District rules and regulations and does not require discretionary judgment or deliberation. Thus, the District concludes that this permitting action constitutes a ministerial approval. Section 21080 of the Public Resources Code exempts from the application of CEQA those projects over which a public agency exercises only ministerial approval. Therefore, the District finds that this project is exempt from the provisions of CEQA.

IX. Recommendation

Issue Authority to Construct N-257-7-0 subject to the permit conditions on the attached draft Authority to Construct in Appendix I.

X. Billing Information

Billing Schedule			
Permit Number	**Fee Schedule**	**Fee Description**	**Fee Amount**
N-257-7-0	3020-01-C	60 Electric HP	$197.00

Appendixes

I. Draft Authority to Construct Permit
II. Risk Management Review Results
III. QNEC Calculations

Appendix I

Draft Authority to Construct Permit

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

PERMIT NO: N-257-7-0

ISSUANCE DATE: DRAFT

LEGAL OWNER OR OPERATOR: DART CONTAINER CORPORATION
MAILING ADDRESS: 1400 EAST VICTOR ROAD
LODI, CA 95240

LOCATION: 1400 EAST VICTOR ROAD
LODI, CA 95240

EQUIPMENT DESCRIPTION:
GRAPHIC ARTS PRINTING OPERATION CONSISTING OF FOUR DART MODEL 250 AND EIGHT DART MODEL 200 FLEXOGRAPHIC/OFFSET LITHOGRAPHIC PRINTERS

CONDITIONS

1. {1830} 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 NSR Rule] Federally Enforceable Through Title V Permit
2. {1831} 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. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
4. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
5. The quantity of UV ink used by each printing press shall not exceed 15 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The VOC content of the UV inks used in this graphic arts operation shall not exceed 0.3% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Solvents used by this graphic arts operation shall not contain volatile organic compounds. [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

DRAFT

DAVID WARNER, Director of Permit Services
N-257-7-0 : Sep 26 2011 4:59PM – HARADERJ : Joint Inspection NOT Required

8. Permittee shall keep a daily record of the quantity of UV ink used by each printing press, in lb. [District Rule 2201] Federally Enforceable Through Title V Permit

9. Permittee shall maintain a current file that includes a material safety data sheet (MSDS) or product data sheet for each ink used that includes the material name, manufacturer's name, the VOC content, less water and exempt compounds and as applied, the specific mixing instructions, and the density. [District Rules 2201 and 4607] Federally Enforceable Through Title V Permit

10. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070, 2201, and 4607] Federally Enforceable Through Title V Permit

DRAFT

Appendix II
Risk Management Review Results

San Joaquin Valley Air Pollution Control District
Risk Management Review

To:	Jagmeet Kahlon, AQE – Permit Services
From:	Ester Davila, SAQS – Technical Services
Date:	June 15, 2011
Facility Name:	Dart Container Corporation
Location:	1400 Victor Road, Lodi CA 95240
Application #(s):	N-257-7-0
Project #:	N-1110917

A. RMR SUMMARY

RMR Summary			
Categories	**12-Flexographic/Offset Lithographic Printers (Units 7-0)**	**Project Totals**	**Facility Totals**
Prioritization Score	**0.00***	0.00	N/A
Acute Hazard Index	N/A	N/A	N/A
Chronic Hazard Index	N/A	N/A	N/A
Maximum Individual Cancer Risk (10^{-6})	N/A	N/A	N/A
T-BACT Required?	**No**		
Special Permit Conditions?	**No**		

*A prioritization was not performed after a review of MSDS sheets. No further analysis was required.

I. Project Description

Technical Services received a request on June 8, 2011, to perform a Risk Management Review for the installation of a graphic arts printing operation with 12 flexographic/offset lithographic printers.

II. Analysis

Technical Services reviewed all submitted MSDS sheets for hazardous air pollutants (HAPs). After reviewing the MSDS sheets, it was determined that there are no HAPs present. No prioritization was required or performed for this project. Therefore, no further analysis was necessary.

III. Conclusion

The effective prioritization score for this project is 0.0. **In accordance with the District's Risk Management Policy, the project is approved without Toxic Best Available Control Technology (T-BACT).**

These conclusions are based on the data provided by the applicant and the project engineer. Therefore, this analysis is valid only as long as the proposed data and parameters do not change.

Appendix III
QNEC Calculations

Quarterly Net Emissions Change (QNEC)

The Quarterly Net Emissions Change is used to complete the emission profile screen for the District's PAS database. The QNEC shall be calculated as follows:

QNEC = PE2 - BE, where:

QNEC = Quarterly Net Emissions Change for each emissions unit, lb/qtr.
PE2 = Post Project Potential to Emit for each emissions unit, lb/qtr.
BE = Baseline Emissions (per Rule 2201) for each emissions unit, lb/qtr.

Using the values in Sections VII.C.2 and VII.C.6 in the evaluation above, $PE2_{quarterly}$ and $BE_{quarterly}$ can be calculated as follows:

Quarterly Post Project Emissions		
Pollutant	PE2 Total (lb/yr)	Quarterly PE2 (lb/qtr)
NO_X	0	0.0
SO_X	0	0.0
PM_{10}	0	0
CO	0	0.0
VOC	192	48.0

$BE_{quarterly}$ = BE_{annual} ÷ 4 quarters/year
= 0 lb/year ÷ 4 qtr/year
= 0 lb/qtr (for all criteria pollutants)

QNEC			
Pollutant	Quarterly PE2 (lb/qtr)	Quarterly BE (lb/qtr)	QNEC (lb/qtr)
NO_X	0.0	0	0.0
SO_X	0.0	0	0.0
PM_{10}	0	0	0
CO	0.0	0	0.0
VOC	48.0	0	48.0