



MAY 22 2013

Richard Sanchez  
Label Technology, Inc.  
2050 Wardrobe Avenue  
Merced, CA 95340

**Re: Proposed Authority to Construct / Certificate of Conformity (Minor Mod)  
District Facility # N-3852  
Project # N-1130482**

Dear Mr. Sanchez:

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 modifications are to increase the daily and annual VOC emission limits.

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

Enclosures  
cc: Mark Schonhoff, Permit Services

**Seyed Sadredin**  
Executive Director/Air Pollution Control Officer

**Northern Region**  
4800 Enterprise Way  
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MAY 22 2013

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-3852**  
**Project # N-1130482**

Dear Mr. Rios:

Enclosed for your review is the District's engineering evaluation of an application for Authority to Construct for Label Technology, Inc., located at 2050 Wardrobe Avenue in Merced, CA, which has been issued a Title V permit. Label Technology, Inc. is requesting that a Certificate of Conformity, with the procedural requirements of 40 CFR Part 70, be issued with this project. The modifications are to increase the daily and annual VOC emission limits.

Enclosed is the engineering evaluation of this application, a copy of the current Title V permit, and proposed Authority to Construct # N-3852-17-2 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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# Authority to Construct Application Review

Facility Name: Label Technology  
Mailing Address: 2050 Wardrobe Avenue  
Merced, CA 95340

Date: May 15, 2013

Contact Person: Richard Sanchez  
Telephone: (209) 384-1000

Engineer: Mark Schonhoff  
Application #: N-3852-17-2  
Project #: N-1130482  
Deemed Complete: April 16, 2013

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## I. Proposal

The applicant is proposing to receive an Authority-to-Construct permit authorizing an increase in the daily and annual VOC emissions from the laminator. No change to the annual facility-wide VOC emission limit is proposed.

The facility is operating under a Title V permit and the applicant has proposed to receive the Authority-to-Construct permit with a Certificate-of-Conformity. Therefore, the 45-day EPA notice will be conducted prior to the issuance of the Authority-to-Construct permit.

## II. Applicable Rules

2201 New and Modified Stationary Source Review Rule (4/21/11)  
2410 Prevention of Significant Deterioration (6/16/11)  
4101 Visible Emissions (11/15/01)  
4102 Nuisance (12/17/92)  
4607 Graphic Arts and Paper, Film, Foil and Fabric Coatings (12/18/08)  
CH&SC 41700  
CH&SC 42301.6  
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

2050 Wardrobe Avenue  
Merced, CA

The equipment is not located within 1,000 feet of a K-12 school.

#### **IV. Process Description**

A web of foil backed paper is placed on an unwind drum and fed through the laminating unit where a roll coater applies adhesive to the paper side. The material then travels through a permit exempt natural gas fired heater that causes the adhesive to become tacky. It is then fed into the laminating side where a web of paper is laminated to the foil backed paper. The final product is then rolled onto a finished product roll. The laminated product will then be printed on using other permitted equipment. The finished product will be formed into packaging (for lotions, gels, etc.) at another facility.

#### **V. Equipment Listing**

##### **Premodification Equipment Listing:**

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))

##### **Post modification Equipment Listing:**

No change.

#### **VI. Emission Control Technology Evaluation**

Low-VOC adhesives will be utilized for VOC emission control.

#### **VII. General Calculations**

##### **A. Assumptions**

The unit is currently permitted to operate 365 days per year and will continue to be permitted to operate 365 days per year.

It will be assumed that all VOC's applied are emitted.

##### **B. Emission Factors**

The applicant has proposed mass based VOC emission limits, therefore, emission factor calculations are not necessary.

##### **C. Potential to Emit (PE)**

###### **1. Potential to Emit**

###### **Premodification:**

$PE_{VOC} = 0.7 \text{ lb/day (Current Permit to Operate)}$

$PE_{VOC} = (0.7 \text{ lb/day})(365 \text{ days/yr}) = 256 \text{ lb/yr}$

**Postmodification:**

PE<sub>VOC</sub> = 2.7 lb/day (applicant)

PE<sub>VOC</sub> = 454 lb/yr (applicant)

**D. Increase in Permitted Emissions (IPE)**

**1. Quarterly IPE**

$$\text{IPE} = 454 \text{ lb/yr} - 256 \text{ lb/yr} = 198 \text{ lb/yr (49.5 lb/qtr)}$$

The emission profile for this ATC will include the following:

	NOx (lb)	SOx (lb)	PM10 (lb)	CO (lb)	VOC (lb)
Annual PE	0	0	0	0	454
Daily PE	0	0	0	0	2.7
Δ PE (Qtr 1)	0	0	0	0	49
Δ PE (Qtr 2)	0	0	0	0	49
Δ PE (Qtr 3)	0	0	0	0	50
Δ PE (Qtr 4)	0	0	0	0	50

**2. Adjusted Increase in Permitted Emissions (AIPE)**

AIPE is used to determine whether or not Best Available Control Technology (BACT) is required for modified units.

$$\text{AIPE} = \text{PE}_2 - \text{HAPE}$$

Where: PE<sub>2</sub> is the post project PE, in lb/day  
HAPE is the Historically Adjusted Potential to Emit, in lb/day.

$$\text{Where: HAPE} = \text{PE}_1(\text{EF}_2/\text{EF}_1)$$

Where: PE<sub>1</sub> is the pre-project PE, in lb/day  
EF<sub>1</sub> is the pre-project emission factor  
EF<sub>2</sub> is the post-project emission factor

Note: If EF<sub>2</sub> is greater than EF<sub>1</sub>, then EF<sub>2</sub>/EF<sub>1</sub> is set to 1

$$\text{PE}_{1\text{VOC}} = 0.7 \text{ lb/day}$$

$$\text{PE}_{2\text{VOC}} = 2.7 \text{ lb/day}$$

$$\text{EF}_2/\text{EF}_1: 1 \text{ (no change to emission factors)}$$

$$\text{AIPE}_{\text{VOC}} = 2.7 \text{ lb/day} - (0.7 \text{ lb/day})(1) = 2.0 \text{ lb/day}$$

**E. Facility Emissions**

**1. Pre Project Stationary Source Potential to Emit (SSPE1)**

The permitted equipment emits only VOC, and the facility operates under a facility-wide VOC limit of less than 50,000 lb/yr. Therefore, the facility-wide potential to emit of VOC is 49,999 lb/yr.

SSPE1 (lb/yr)					
Permit #	NOx	CO	VOC	SOx	PM10
N-3852-1-5	0	0	49,999	0	0
N-3852-2-5	0	0		0	0
N-3852-9-3	0	0		0	0
N-3852-13-2	0	0		0	0
N-3852-14-2	0	0		0	0
N-3852-15-1	0	0		0	0
N-3852-16-2	0	0		0	0
N-3852-17-1	0	0		0	0
N-3852-18-1	0	0		0	0
N-3852-19-1	0	0		0	0
N-3852-20-1	0	0		0	0
ERC	0	0		0	0
Total	0	0	49,999	0	0

**2. Post Project Stationary Source Potential to Emit (SSPE2)**

No changes to the facility-wide VOC limit of 49,999 lb/yr are proposed.

SSPE2 (lb/yr)					
Permit #	NOx	CO	VOC	SOx	PM10
N-3852-1-5	0	0	49,999	0	0
N-3852-2-5	0	0		0	0
N-3852-9-3	0	0		0	0
N-3852-13-2	0	0		0	0
N-3852-14-2	0	0		0	0
N-3852-15-1	0	0		0	0
N-3852-16-2	0	0		0	0
N-3852-17-2	0	0		0	0
N-3852-18-1	0	0		0	0
N-3852-19-1	0	0		0	0
N-3852-20-1	0	0		0	0
ERC	0	0		0	0
Total	0	0	49,999	0	0

### 3. Stationary Source Increase in Permitted Emissions (SSIPE)

$$\text{SSIPE} = \text{SSPE2} - \text{SSPE1}$$

The SSPE1 and SSPE2 balances are from sections VII.E.1 and VII.E.2 of this document.

	SSPE2 (lb/yr)	SSPE1 (lb/yr)	SSIPE (lb/yr)
NOx	0	0	0
CO	0	0	0
VOC	49,999	49,999	0
SOx	0	0	0
PM10	0	0	0

### 4. Baseline Emissions

The purpose of determining Baseline Emissions is for use in calculating the quantity of offsets required. As shown in section VIII (Rule 2201 Compliance), offsets are not required, therefore, it is not necessary to determine the Baseline Emissions.

### F. Major Source Determination

#### Rule 2201 Major Source Determination:

The Major Source thresholds, the facility-wide potentials to emit and whether or not the facility is a Major Source are shown on the following table. The Major Source thresholds are from Section 3.24.1 of Rule 2201. Since no emission reduction credits have been generated at this facility, the post-modification facility-wide potential to emit is equal to the SSPE2.

Pollutant	Threshold (lb/yr)	Facility PE (lb/yr)	Major Source
NOx	20,000	0	No
CO	200,000	0	No
VOC	20,000	49,999	Yes
SOx	140,000	0	No
PM10	140,000	0	No

**Rule 2410 Major Source Determination:**

The equipment currently under consideration is not a source category listed in 40 CFR Part 52.21(b)(1)(i), therefore, the applicable thresholds are those shown on the table below.

Pollutant	Threshold (tons/yr)	Facility PE (tons/yr)	Major Source
NOx	250	0	No
CO	250	0	No
VOC	250	25	No
SOx	250	0	No
PM	250	0	No
PM10	250	0	No
CO <sub>2e</sub>	100,000	0	No

**G. Major Modification Determination**

**SB-288 Major Modification:**

The purpose of SB-288 Major Modification calculations is to determine the following:

If Best Available Control Technology (BACT) is required for a Major Source pollutant from a new or modified emission unit involved in a permitting action that is a Major Modification (District Rule 2201, §4.1.3); and

If a public notification is triggered (District Rule 2201, §5.4.1).

Per section 3.36 of Rule 2201 and the District's draft policy titled Implementation of Rule 2201 (as amended on 12/18/08 and effective on 6/10/10) for SB-288 Major Modifications and Federal Major Modifications, a permitting action is an SB-288 Major Modification if the Net Emission Increase (NEI) for the new and modified units involved in the project exceed the thresholds shown on the following table. The equipment currently under consideration will emit only VOC, therefore, only VOC will be addressed.

Pollutant	Threshold (lb/yr)
VOC	50,000

As shown in section VII.C.1 of this document, the potential to emit of VOC is less than its SB-288 Major Modification threshold. Therefore, this permitting action is not an SB-288 Major Modification.

**Federal Major Modification:**

Per the District's draft policy titled "Implementation of Rule 2201 (as amended on 12/18/08 and effective on 6/10/10) for SB288 Major Modifications and Federal Major Modifications", if the average increase in emissions is 0.5 lb/day or less then the project is not a Federal Major Modification.

$$\begin{aligned} \text{Average IPE (to the tenths place of precision as specified in the policy)} \\ = (454 \text{ lb/yr} - 256 \text{ lb/yr}) / (365 \text{ days/yr}) = 0.5 \text{ lb/day} \end{aligned}$$

The average IPE will not exceed 0.5 lb/day, therefore, this permitting action is not a Federal Major Modification.

**VIII. Compliance**

**Rule 2201 New and Modified Stationary Source Review Rule**

**A. BACT**

**1. BACT Applicability**

**New or Relocated Units:**

Except for CO, BACT is required for each pollutant with a PE of greater than 2.0 pounds per day. For CO, BACT is required if the PE of CO is greater than 2.0 pounds per day and the SSPE2 of CO is 200,000 pounds per year or greater.

**Modified Units:**

Except for CO, BACT is required for each pollutant with an AIPE of greater than 2.0 pounds per day. For CO, BACT is required if the AIPE of CO is greater than 2.0 pounds per day and the SSPE2 of CO is 200,000 pounds or greater.

**Major Modifications:**

BACT is required for the pollutants for which an SB-288 or a Federal Major Modification is triggered.

**Applicability:**

The proposed unit is modified and the permitting action is not an SB-288 or Federal Major Modification. Therefore, whether or not BACT is required is dependent only on the AIPE. Since the permitted equipment will emit only VOC, an applicability determination is required only for VOC. The table below shows the AIPE of VOC and whether or not BACT is required.

Operation	AIPE (lb/day)	BACT Required
Laminator	2.0	No

## 2. BACT Analysis

As shown above, BACT is not required. Therefore, a BACT analysis is not necessary.

## B. OFFSETS

### 1. Offset Applicability

Per section 4.5.3 of Rule 2201, offsets are examined on a pollutant by pollutant basis and are triggered for any pollutant with an SSPE2 equal to or greater than the value on the following table:

Pollutant	SSPE2 (lb/yr)
NOx	20,000
CO (in CO attainment areas)	200,000
VOC	20,000
SOx	54,750
PM10	29,200

As shown in section VII.E.2 of this document, the SSPE2 of each pollutant is:

Pollutant	SSPE2 (lb/yr)	Offsets Triggered
NOx	0	No
CO	0	No
VOC	49,999	Yes
SOx	0	No
PM10	0	No

### 2. Quantity of Offsets Required

Per District's policy APR-1130 "Increases in Maximum Daily Permitted Emissions of Less than or Equal to 0.5 lb/day", increases in emissions of 0.5 lb/day (less than or equal to 0.54 lb/day) are to be set to zero for the purpose of determining offset quantities.

$$PE_{1\text{voc}} = 256 \text{ lb/yr}$$

$$PE_{2\text{voc}} = 454 \text{ lb/yr}$$

$$IPE = (454 \text{ lb/yr} - 256 \text{ lb/yr}) / (365 \text{ days/yr}) = 0.5 \text{ lb/day}$$

The calculated offset quantity does not exceed 0.5 lb/day, therefore, per District policy APR-1130, offsets are not required.

## C. PUBLIC NOTIFICATION

### 1. Applicability

District Rule 2201 section 5.4 requires a public notification for the affected pollutants from the following types of projects:

- a. New Major Sources
- b. Major Modifications
- c. New emission units with a PE > 100 lb/day of any one pollutant (IPE Notifications)
- d. Modifications with SSPE1 below an offset threshold and SSPE 2 above an offset threshold on a pollutant by pollutant basis (Existing Facility Offset Threshold Exceedence Notification)
- e. New stationary sources with SSPE2 exceeding offset thresholds (New Facility Offset Threshold Exceedence Notification)
- f. Any permitting action with a SSIPE exceeding 20,000 lb/yr for any one pollutant. (SSIPE Notice)

#### a. New Major Source Notice Determination:

The facility is not new, therefore, a New Major Source Determination notice is not required.

#### b. Major Modification Notice:

As shown in section VII.G of this document, this permitting action is not a Federal Major Modification or an SB-288 Major Modification. Therefore, a public notice is required.

#### c. PE Notification:

A notification is required for each new emission unit with the potential to emit more than 100 pounds per day of any one affected pollutant. This permitting action does not include any new units, therefore, a notification is not required.

#### d. Existing Facility Offset Threshold Exceedence Notification

The SSPE of no pollutant will go from below to above an offset threshold. Therefore, a public notification is not required.

#### e. New Facility Offset Threshold Exceedence Notification

This is an existing facility. Therefore, a public notification is not required.

**f. SSIPE Notification:**

A notification is required for any permitting action that results in an SSIPE of more than 20,000 lb/yr of any affected pollutant. As shown in section VII.E.3 of this document, the SSIPE of each pollutant will be less than 20,000 pounds per year. An SSIPE notification is not required.

**2. Public Notice**

As shown above, a public notification is not required.

**D. DAILY EMISSION LIMITS**

The VOC emissions from this unit shall not exceed 2.7 pounds during any one day.

To enforce the previously discussed assumption that the average daily emissions increase will not exceed 0.5 lb, the ATC and the PTO will also include the following condition:

The VOC emissions from this unit shall not exceed 454 pounds during any rolling 12-month period.

To clarify the VOC emission calculations that are to be performed for record keeping purposes, the following condition will be included on the ATC and the PTO.

The VOC emissions from this unit shall be calculated assuming that all VOC's applied are emitted.

**E. Compliance Assurance**

**1. Source Testing**

As they apply to the equipment currently under consideration, no District rule or policy requires source testing.

**2. Monitoring**

As they apply to the equipment currently under consideration, no District rule or policy requires monitoring.

**3. Record Keeping**

To make it possible to enforce the daily and annual emission limits that will apply to this unit, records of those emission quantities will be required.

#### **4. Reporting**

As they apply to the equipment currently under consideration, no District rule or policy requires reporting.

#### **Rule 2410 Prevention of Significant Deterioration**

Rule 2410 applies to pollutants for which the District is in attainment or for unclassified pollutants. The pollutants addressed in the PSD applicability determination are listed as follows:

- NO<sub>2</sub> (as a primary pollutant)
- SO<sub>2</sub> (as a primary pollutant)
- CO
- PM
- PM<sub>10</sub>
- Greenhouse gases (GHG): CO<sub>2</sub>, N<sub>2</sub>O, CH<sub>4</sub>, HFCs, PFCs, and SF<sub>6</sub>

The first step of this PSD applicability evaluation consists of determining whether the facility is an existing PSD Major Source. This facility is not an existing PSD Major source (See Section VII.F of this document).

In the case if a facility that is NOT an existing PSD Major Source. The second step of the PSD evaluation is to determine if the project, by itself, would be a PSD major source.

#### **Potential to Emit for All Emission Units at the Facility vs PSD Major Source Thresholds:**

As a screening tool, the potential to emit from all new and modified units at the facility is compared to the PSD major source threshold and if the total potential to emit from all new and modified units at the facility is below this threshold, no further analysis will be needed.

The facility or the equipment evaluated under this project is not listed as one of the categories specified in 40 CFR 52.21 (b)(1)(i). Therefore the following PSD Major Source thresholds are applicable.

<b>PSD Major Source Determination: Potential to Emit (tons/year)</b>							
	NO <sub>2</sub>	VOC	SO <sub>2</sub>	CO	PM	PM <sub>10</sub>	CO <sub>2e</sub>
Total PE from New and Modified Units	0	0.23	0	0	0	0	0
PSD Major Source threshold	250	250	250	250	250	250	100,000
New PSD Major Source?	No	No	No	No	No	No	No

As shown in the table above, the project potential to emit, by itself, does not exceed any of the PSD major source thresholds. Therefore, Rule 2410 is not applicable and no further discussion is required.

#### **Rule 2520 Federally Mandated Operating Permits**

The proposed permitting action is a Minor Modification to the Title V permit and the applicant has proposed to receive the ATC with a Certificate of Conformity. Therefore, the 45-day EPA comment period will be satisfied prior to the issuance of the ATC. The following federally enforceable conditions will be placed on the Authority to Construct permit:

*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).*

*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.*

#### **Rule 4001 New Source Performance Standards**

##### **40 CFR Part 60 Subpart QQ, Standards of Performance for the Graphic Arts Industry: Publication Rotogravure Printing**

Per section 60.430, this subpart applies only to publication rotogravure printing presses. The unit under consideration is a laminator and is therefore not a subject unit.

## **Rule 4002 National Emission Standards for Hazardous Air Pollutants**

### **40 CFR Part 63, Subpart KK, National Emission Standards for the Printing and Publishing Industry**

#### **§63.820 Applicability**

This facility has established itself as an area source of HAP emissions by limiting its HAP potential to emit (Project N-1113462), as described in §63.820(a)(2). Pursuant to §63.820(a)(3), area sources are only subject to the provisions of §63.829(d) and §63.830(b)(1) of this subpart.

§63.829(d) states that the owner or operator must keep records of all required measurements and calculations needed to demonstrate compliance with the HAP emission limit.

§63.830(b)(1) requires the facility to submit an initial notification to the District. The Initial TV permit application includes the data required by the notification; therefore, this requirement has been satisfied.

The following conditions are included on the current title V permit and will continue to be included:

*Total stationary source emissions shall not exceed 10 tons in any rolling-12 month period of any single hazardous air pollutant (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 63 Subpart KK]*

*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]*

### **40 CFR Part 63, Subpart JJJJ, National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating**

This subpart applies only to paper and other web coating equipment. The unit under consideration does not perform coating, therefore, it is not a subject unit.

## **Rule 4101 Visible Emissions**

As long as the equipment is properly maintained and operated, the visible emissions are not expected to exceed 20% opacity for a period or periods aggregating more than 3 minutes in any one hour. Compliance with the provisions of this rule is expected.

## **Rule 4102 Nuisance**

### **A. California Health & Safety Code 41700 (Health Risk Analysis)**

A Risk Management Review (RMR) was conducted by the Technical Services Division of the SJVAPCD and the prioritization score was determined to be 0.0. Such a score is indicative of emissions that will not cause a significant health risk to the public. A copy of the RMR summary is in Appendix C of this document.

### **B. Toxics BACT (T-BACT)**

As shown in the RMR summary that is in Appendix C of this document, Toxics BACT is not required.

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

As it applies to the laminating operation currently under consideration, this rule regulates material VOC contents, material application methods, solvent cleaning methods, organic solvent storage and disposal methods and work practices.

Compliance with this rule was addressed during the recent issuance of the initial Title V permit (project N-1113134). Compliance with section 5.1 (VOC content limits) will be re-addressed to ensure that the adhesives still comply with the VOC content limits. Continued compliance with the remainder of this rule is expected, therefore, readdressing compliance with the remainder of this rule is not necessary.

### **Material VOC Content Limits:**

#### **Section 5.1 (Inks, Coatings and Adhesives):**

The laminator will be used only to apply adhesives. Per table 1 of this section, the adhesives VOC content limit is 150 g/l (1.25 lb/gal).

The VOC contents of the adhesives that will be used are:

#### **HB Fuller PWF1510H2:**

Mix Ratio: 98 Parts PWF1510H2 (VOC = 0.0425 lb/gal)  
2 Parts XR2990 (VOC = 0.0 lb/gal)

VOC Content =  $(98/100)(0.0425 \text{ lb/gal}) + (2/100)(0.0 \text{ lb/gal}) = 0.042 \text{ lb/gal}$

#### **Dow L-330:**

Mix Ratio: 98 Parts L-330 (VOC = 0.0 lb/gal)  
2 Parts CR9-101 (VOC = 0.017 lb/gal)

VOC Content =  $(98/100)(0.0 \text{ lb/gal}) + (2/100)(0.017 \text{ lb/gal}) = 0.0003 \text{ lb/gal}$

**Dow L-148:**

Mix Ratio: 98 Parts L-148 (VOC = 0.0 lb/gal)  
2 Parts CR9-101 (VOC = 0.017 lb/gal)

$$\text{VOC Content} = (98/100)(0.0 \text{ lb/gal}) + (2/100)(0.017 \text{ lb/gal}) = 0.0003 \text{ lb/gal}$$

As can be seen, the VOC content of the adhesives is less than the limit established by the rule. To ensure compliance with this limit, a condition limiting the adhesive VOC content will continue to be included in the Permit-to-Operate.

**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.
- 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 the activity will occur at an existing facility and the project involves negligible expansion of the existing use. Furthermore, the District determined that the activity will not have a significant effect on the environment. The District finds that the activity is categorically exempt from the provisions of CEQA pursuant to CEQA Guideline § 15031 (Existing Facilities), and finds that the project is exempt per the general rule that CEQA applies only to projects which have the potential for causing a significant effect on the environment (CEQA Guidelines §15061(b)(3)).

**Greenhouse Gas Significance Determination**

The District's engineering evaluation (this document) demonstrates that the project would not result in an increase in project specific greenhouse gas emissions. The District therefore concludes that the project would have a less than cumulatively significant impact on global climate change.

**California Health & Safety Code 42301.6 (School Notice)**

The equipment will not be located within 1,000 feet of a K-12 school, therefore, a school notice is not required.

**IX. Recommendation**

Issue an Authority-to-Construct Permit with the conditions on the attached draft Authority-to-Construct Permit.

**X. Billing Information**

**Premodification:**

Permit #	Description	Fee Schedule
N-3852-17-1	18 hp	3020-1-B

**Post modification:**

Permit #	Description	Fee Schedule
N-3852-17-2	18 hp	3020-1-B

**Appendices**

- Appendix A: Draft ATC
- Appendix B: Current PTO
- Appendix C: HRA Summary
- Appendix D: Compliance Certification Form (TV-009)

**Appendix A**  
**Draft ATC**

San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

ISSUANCE DATE: DRAFT  
**DRAFT**

**PERMIT NO:** N-3852-17-2

**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. {98} 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.

Seyed Sadredin, Executive Director APCO

**DAVID WARNER**, Director of Permit Services

N-3852-17-2: May 15 2013 10:34AM -- BCHOHOM 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

**DRAFT**

## **Appendix B Current PTO**

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-3852-17-1

**EXPIRATION DATE:** 10/31/2017

**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))

## PERMIT UNIT REQUIREMENTS

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1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. 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
3. The VOC emissions shall not exceed 0.7 pound during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
4. 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
5. 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
6. 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
7. 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
8. 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
9. 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
10. 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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

11. 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
12. 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
13. The operator shall minimize spills of VOC containing adhesive products and process-related waste. [District Rule 4653] Federally Enforceable Through Title V Permit
14. 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
15. 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
16. 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
17. 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
18. 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
19. 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
20. 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
21. 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
22. 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
23. 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
24. 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

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

## **Appendix C HRA Summary**

## San Joaquin Valley Air Pollution Control District Risk Management Review

**To:** Mark Schonhoff – Permit Services  
**From:** Kyle Melching – Technical Services  
**Date:** April 17, 2013  
**Facility Name:** Label Technology  
**Location:** 2050 Wardrobe Ave., Merced  
**Application #(s):** N-3852-17-2  
**Project #:** N-1130482

### A. RMR SUMMARY

RMR Summary			
Categories	Graphics Arts Operation (Unit 17-2)	Project Totals	Facility Totals
<b>Prioritization Score</b>	0.00*	0.00*	>1
<b>Acute Hazard Index</b>	N/A	N/A	0.64
<b>Chronic Hazard Index</b>	N/A	N/A	0.7
<b>Maximum Individual Cancer Risk</b>	N/A	N/A	0.00
<b>T-BACT Required?</b>	No		
<b>Special Permit Conditions?</b>	No		

\*A prioritization was not performed after determining no Hazardous Air Pollutants (HAPs) are associated with this project. No further analysis was required.

#### I. Project Description

Technical Services received a request on April 16, 2013, to perform a Risk Management Review to increase adhesive throughput for a graphics arts operation.

#### II. Analysis

After reviewing the information provided in the Risk Management Review request along with MSDS sheets for the proposed adhesive products, Technical Services determined that there are no HAPs associated with this project. Therefore, no further analysis or prioritization was required for this project.

#### III. Conclusion

The proposed project will not contribute to the facility's risk. 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.

**IV. Attachments**

- A. RMR request from the project engineer
- B. Additional information from the applicant/project engineer
- C. Facility Summary

**Appendix D**  
**Compliance Certification Form (TV-009)**

**San Joaquin Valley  
Unified Air Pollution Control District**

**TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM**

**L TYPE OF PERMIT ACTION (Check appropriate box)**

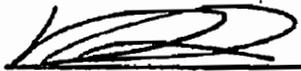
- SIGNIFICANT PERMIT MODIFICATION                       ADMINISTRATIVE  
 MINOR PERMIT MODIFICATION                                       AMENDMENT

COMPANY NAME: <b>Label Technology Inc</b>	FACILITY ID: <b>N - 3852</b>
1. Type of Organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name: <b>John Bankson</b>	
3. Agent to the Owner:	

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

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

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

  
\_\_\_\_\_

Signature of Responsible Official

April 16, 2013

Date

Vinton Thengvall  
\_\_\_\_\_

Name of Responsible Official (please print)

Chief Financial Officer  
\_\_\_\_\_

Title of Responsible Official (please print)