



**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT  
ENGINEERING AND COMPLIANCE DIVISION**

**Coating, Printing, Aerospace & Metal Finishing Team**

**PERMIT APPLICATION EVALUATION**

Page 1 of 8  
A/Ns 549359

Processed by: WW  
Reviewed by: SMKE

Date 4/17/13

**PERMIT TO CONSTRUCT/OPERATE**

*ONE NEW LITHOGRAPHIC PRINTING PRESS*

**Applicant's Name:** *Bang Printing*

**Facility ID:** 157292

**Mailing Address:** 28210 N. Avenue Stanford, Valencia, CA 91355

**Equipment Address:** 28210 N. Avenue Stanford, Valencia, CA 91355

**EQUIPMENT DESCRIPTION**

**A/N 549359 New**

LITHOGRAPHIC PRINTING SYSTEM CONSISTING OF:

1. LITHOGRAPHIC PRINTING PRESS, AKIYAMA INTERNATIONAL, MODEL NO. JPRINT P540, SERIAL NO. A06135, 10 COLOR, 40 INCH SHEET WIDTH.
2. INFRARED DRYER, 6 KW TOTAL.

**A/N 529360**

*Title V Revision Plan, Deminimis Significant*

**Conditions:**

1. OPERATION OF THIS EQUIPMENT SHALL BE CONDUCTED IN ACCORDANCE WITH ALL DATA AND SPECIFICATIONS SUBMITTED WITH THE APPLICATION UNDER WHICH THIS PERMIT IS ISSUED UNLESS OTHERWISE NOTED BELOW.  
[RULE204]
2. THIS EQUIPMENT SHALL BE PROPERLY MAINTAINED AND KEPT IN GOOD OPERATING CONDITION AT ALL TIMES.  
[RULE 204]
3. THE VOC CONTENT OF THE FOUNTAIN SOLUTION USED IN THIS EQUIPMENT SHALL NOT EXCEED 0.52 POUNDS PER GALLON OF MATERIAL, AS APPLIED, INCLUDING WATER AND EXEMPT COMPOUNDS.  
[RULE 1303(a)(1)-BACT]



**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT  
ENGINEERING AND COMPLIANCE DIVISION**

***Coating, Printing, Aerospace & Metal Finishing Team***

**PERMIT APPLICATION EVALUATION**

Page	2 of 8
A/Ns	549359
Processed by:	WW
Reviewed by:	SMKE
Date	4/17/13

4. MATERIALS USED IN THIS EQUIPMENT SHALL NOT CONTAIN ANY TOXIC AIR CONTAMINANTS IDENTIFIED IN RULE 1401, TABLE 1 WITH AN EFFECTIVE DATE OF SEPTEMBER 10, 2010 OR EARLIER WITH THE EXCEPTION OF ETHYLENE GLYCOL MONOBUTYL ETHER (EGBE) (CAS # 111-76-2).  
[RULE 1401]
  
5. IN ADDITION TO RECORDKEEPING REQUIREMENTS OF RULE 109, THE OPERATOR SHALL KEEP ADEQUATE RECORDS FOR THIS EQUIPMENT TO VERIFY THE FOLLOWING ON A DAILY BASIS.
  - A. INK ABSORPTION FACTOR AS SPECIFIED BY CURRENT DISTRICT GUIDELINES.
  
  - B. DENSITY OF INKS IN POUNDS PER GALLON AND PERCENTAGE BY WEIGHT OF LITHOGRAPHIC OILS IN INKS.
  
  - C. VOC CONTENT OF FOUNTAIN SOLUTION, CLEAN-UP MATERIALS, AND ANY OTHER MATERIALS IN POUNDS PER GALLON AS APPLIED, INCLUDING WATER AND EXEMPT COMPOUNDS.
  
  - D. DAILY EMISSIONS IN POUNDS OF VOC.  
[RULE 109, 1303(b)(2)-OFFSET]
  
6. WITHIN 14 CALENDAR DAYS AFTER THE END OF EACH MONTH, THE OPERATOR SHALL TOTAL AND RECORD VOC EMISSIONS FOR THE MONTH FROM THIS EQUIPMENT. THE RECORD SHALL INCLUDE ANY PROCEDURES USED TO ACCOUNT FOR CONTROL DEVICE EFFICIENCIES AND/OR WASTE DISPOSAL. IT SHALL BE SIGNED AND CERTIFIED FOR ACCURACY BY THE HIGHEST RANKING INDIVIDUAL RESPONSIBLE FOR COMPLIANCE WITH DISTRICT RULES  
[RULE 109, 1303(b)(2)-OFFSET]
  
7. THE OPERATOR SHALL MAINTAIN A SINGLE LIST WHICH INCLUDES ONLY THE NAME AND ADDRESS OF EACH PERSON FROM WHOM THE FACILITY ACQUIRED VOC-CONTAINING MATERIALS REGULATED BY THE DISTRICT THAT WERE USED OR STORED AT THE FACILITY DURING THE PRECEDING 12 MONTHS.  
[RULE 109, 1303(b)(2)-OFFSET]
  
8. THE OPERATOR SHALL RETAIN ALL PURCHASE INVOICES FOR ALL VOC-CONTAINING MATERIAL USED OR STORED AT THE FACILITY, AND ALL



**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT  
ENGINEERING AND COMPLIANCE DIVISION**

**Coating, Printing, Aerospace & Metal Finishing Team**

**PERMIT APPLICATION EVALUATION**

Page	3 of 8
A/Ns	549359
Processed by:	WW
Reviewed by:	SMKE
Date	4/17/13

WASTE MANIFESTS FOR ALL WASTE VOC-CONTAINING MATERIAL REMOVED FROM THE FACILITY.  
[RULE 109, 1303(b)(2)-OFFSET]

9. THE TOTAL QUANTITY OF VOLATILE ORGANIC COMPOUND (VOC) EMISSIONS FROM THIS FACILITY SHALL NOT EXCEED 383 POUNDS IN ANY ONE DAY. (FACILITY CONDITION)  
[RULE 1303(b)(2)-OFFSET]
10. THE TOTAL QUANTITY OF VOC EMISSIONS FROM THIS EQUIPMENT SHALL NOT EXCEED 900 POUNDS IN ANY CALENDAR MONTH.  
[RULE 1303(b)(2)-OFFSET]
11. MATERIAL SAFETY DATA SHEETS FOR ALL MATERIALS USED AT THIS FACILITY AND SUBJECT TO DISTRICT RULES SHALL BE KEPT CURRENT AND BE MADE AVAILABLE TO DISTRICT PERSONNEL UPON REQUEST. (FACILITY CONDITION)  
[RULE 109, 1303(b)(2)-OFFSET]

**BACKGROUND**

Bang Printing submitted the above applications on 4/05/13 for a new lithographic printing press and for a Title V de minimis significant permit revision to include these changes in their Title V facility permit. The company is a large sized commercial lithographic offset printing facility where publications are printed on coated and uncoated papers. The company is currently operating under a facility-wide VOC emission limit of 383 pounds per day.

The new press will operate under the existing facility VOC emission limit of 383 pounds per day. This press will be limited to 900 lbs/month and bubbled into the existing facility VOC cap, therefore Rule 212 public notice is not required.

Bang Printing is a Title V facility. The Title V permit was renewed on September 21, 2012 and this is the first revision to the renewal. The proposed project is considered as a “de minimis significant permit revision” to the renewed Title V permit, as described in the Regulation XXX evaluation.

The District database shows that the company has not received any notices to comply or violations or other complaints from the public in the last two years. The company was last inspected on 1/12/12 and was found to be in compliance with all the District Rules and Regulations according to the inspector’s report.



**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT  
ENGINEERING AND COMPLIANCE DIVISION**

**Coating, Printing, Aerospace & Metal Finishing Team**

**PERMIT APPLICATION EVALUATION**

Page 4 of 8  
A/Ns 549359  
Processed by: WW  
Reviewed by: SMKE  
Date 4/17/13

**PROCESS DESCRIPTION**

Bang Printing is a commercial printer producing reports, inserts, magazines, calendars, brochures, labels, book covers, and other publications. The facility also operates three heat-set presses vented to a thermal oxidizer, two other IR litho printing, a UV coating line and an emergency IC engine.

**EMISSION CALCULATIONS**

The facility is operating under an emission cap of 383 lbs/day of VOC. This press will be limited to 900 lbs/month and bubbled into the existing facility VOC cap therefore there will be no emission increase from the facility.

Operating schedule: 24 hr/day, 6 days/week, 52 weeks/year

NSR Entry 30 lbs VOC/day, 1.25 lbs/hr  
30 day average entry = 0 (bubble)

**TOXICS**

There are no carcinogenic compounds present in the materials to be used in this equipment. There is a small quantity of an acute compound as shown below:

Material	VOC content (lb/gal)	Density (lb/gal)	TAC	CAS #	Max Wt%	Effect
FS Concentrate (Etch)	1.37	8.85	2-butoxyethanol (EGBE)	111-76-2	10%	Acute

TAC	CAS #	Density (lb/gal)	Max Wt%	Max Usage (gal/yr)	Lb/year	Lb/hr
EGBE	111-76-2	8.85	10%	68.6	60.8	0.008

**RULE EVALUATION**

**RULE 212(c)(1)** *This section requires a public notice for all new and modified permit units that may emit air contaminants located within 1,000 feet from the outer boundary of a school.*

Since there are no schools within 1,000 feet of the facility, a public notice will not be required by this section.



**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT  
ENGINEERING AND COMPLIANCE DIVISION**

**Coating, Printing, Aerospace & Metal Finishing Team**

**PERMIT APPLICATION EVALUATION**

Page 5 of 8  
A/Ns 549359  
Processed by: WW  
Reviewed by: SMKE  
Date 4/17/13

**RULE 212(c)(2)** *These sections requires a public notice for all new and modified facilities and equipment which have emission increases exceeding any of the daily maximums specified in subdivision (g).*

There is no emissions increase from this facility. Therefore, public notice will not be required by this section.

**RULE 212(c)(3)** *This section requires a public notice for all new or modified permit units with increases in emissions of toxic air contaminants listed in Table I of Rule 1401 resulted in MICR greater than  $1E^{-6}$  per permit unit or greater than  $10E^{-6}$  per facility.*

There are no carcinogenic coatings present in the materials to be used in this equipment however there is an acute TAC present in the graphic arts materials. A screening risk assessment was conducted and shows the HIA is below 1. Therefore, public notice is not required.

**RULE 212(g)** *This section requires a public notice for all new and modified sources that have equipment emission increases exceeding any of the daily maximum as specified by Rule 212 (g).*

As shown in the following table, the emissions increase from the equipment will not exceed the daily maximum limits specified by Rule 212(g). Therefore, public notice will not be required by this section.

	<u>ROG</u>	<u>NO<sub>x</sub></u>	<u>PM<sub>10</sub></u>	<u>SO<sub>2</sub></u>	<u>CO</u>	<u>Pb</u>
Per Equipment	<b>30</b>	0	0	0	0	0
MAX MDC Limit (lb/day)	30	40	30	60	220	3
Required Public Notice	<b>No</b>	No	No	No	No	No

**RULE 401** Visible Emissions

Visible emissions are not expected with proper maintenance and operation of this equipment. The system shows no visible emissions complaints at this location.

**RULE 402** Nuisance

Operation of this equipment is not expected to create complaints or nuisance with proper maintenance and operation. The system shows no nuisance complaints at this location.



**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT  
ENGINEERING AND COMPLIANCE DIVISION**

**Coating, Printing, Aerospace & Metal Finishing Team  
PERMIT APPLICATION EVALUATION**

Page 6 of 8  
A/Ns 549359  
Processed by: WW  
Reviewed by: SMKE  
Date 4/17/13

**RULE 1130**

This equipment is expected to comply with the VOC content requirements.

<i>Material</i>	<i>Rule1130 VOC Limit</i>	<i>Actual VOC Content</i>
Fountain Sol'n	100 g/l (0.83 lb/gal) of material	0.083 lb/gal of material *
Inks	300 g/l (2.5 lb/gal) of coating	1.84– 1.87 lb/gal of coating

<i>Material</i>	<i>VOC Content (lb/gal)</i>	<i>Usage</i>	<i>Total VOC (lb)</i>
<i>Fountain Solution* (FS)</i>			
F/S Etch	1.37	3 oz	0.0321
Alcohol substitute	3.44	2 oz	0.0538
Water	0.00	1 gal	0.000
<b>TOTAL</b>		<b>1.039 gal</b>	<b>0.0859</b>

\*FS VOC content as mixed = 0.0859 lb VOC ÷ 1.039 gal  
= 0.083 lb/gal < 8% by volume

**RULE 1171**

Cleanup materials used in this equipment are compliant with this rule. VOC of wash per MSDS is 0.71 lb/gal. Applicant has noted that they cut at least 3:1 with water, so VOC would be reduced to:

$$0.71 \text{ lb VOC} / 4 \text{ gal} = 0.18 \text{ lb VOC/gal}$$

Even undiluted, the wash (Powerklene EWS & QUV) would comply with the rule.

<i>Material</i>	<i>Rule 1171 VOC Limit</i>	<i>Actual VOC Content</i>
Blanket & Roller Wash	0.83 lb/gal	0.18- 0.71 lb/gal

**REG XIII**

**BACT** BACT is met by use of low VOC fountain solution ( $\leq 8\%$  by volume) and low VOC content washes ( $< 100\text{g/l}$ , 0.83 lb/gal). A permit condition will be imposed for fountain solution VOC content  $< 0.52$  lb/gal (approximately 8% by volume). Rule 1171 already requires VOC of washes to be  $< 100$  g/l.

**MODELING** Modeling is not required for VOC.

**OFFSETS** This press will be operated within the existing facility VOC cap of 383 lb/day VOC. There is no emission increase from this facility and offsets are not required.



**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT  
ENGINEERING AND COMPLIANCE DIVISION**

**Coating, Printing, Aerospace & Metal Finishing Team**

**PERMIT APPLICATION EVALUATION**

Page 7 of 8  
A/Ns 549359  
Processed by: WW  
Reviewed by: SMKE  
Date 4/17/13

**RULE 1401**

*New Source Review of Toxic air Contaminants*

There will be a small (EGBE) amount of a toxic contaminants listed in Rule 1401 as amended 9/10/10. However there are no carcinogenic compounds present; the acute compound emissions summarized below are well below the Tier I screening level. See attached toxic evaluation screening risk assessment.

EGBE (CAS # 111-76-2), 60.8 lb/yr, 0.008 lb/hr

Acute screening level for EGBE is 37.5 lb/hr

Even if all VOC from this press was EGBE (900 lb/mo, 1.25 lb/hr) the emissions would still be below the screening level.

**REG XXX**

This facility is not in the RECLAIM program. The proposed project is considered as a “de minimis significant permit revision” to the Title V permit renewal issued on September 21, 2012. Rule 3000(b)(6) defines a “de minimis significant permit revision” as any Title V permit revision where the cumulative emission increases of non-RECLAIM pollutants or hazardous air pollutants (HAP) from these permit revisions during the term of the permit are not greater than any of the following emission threshold levels:

<i>Air Contaminant</i>	<i>Daily Maximum (lbs/day)</i>
HAP	30
VOC	30
NO <sub>x</sub>	40
PM <sub>10</sub>	30
SO <sub>x</sub>	60
CO	220

Rule 3003(j) specifies that a proposed permit for the initial Title V renewal permit shall be submitted to EPA for review. To determine if a project qualifies for a “de minimis significant permit revision”, emission increases resulting from all permit revisions that are made after the submittal of proposed permit to EPA shall be accumulated and compared to the above threshold levels. The proposed project is the first permit revision requested by the facility since TV permit renewal. This permit revision includes the addition of a new 10-color lithographic IR printing press.

The cumulative emission increases resulting from this proposed permit revision are summarized as follows:



**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT  
ENGINEERING AND COMPLIANCE DIVISION**

**Coating, Printing, Aerospace & Metal Finishing Team**

**PERMIT APPLICATION EVALUATION**

Page 8 of 8  
A/Ns 549359  
Processed by: WW  
Reviewed by: SMKE  
Date 4/17/13

<i>Revision</i>	<i>HAP</i>	<i>VOC</i>	<i>NOx</i>	<i>PM<sub>10</sub></i>	<i>SOx</i>	<i>CO</i>
1 <sup>st</sup> Revision: Add one new 10-color IR dry lithographic printing press (A/N 549359).	0	0	0	0	0	0
Cumulative Total	0	0	0	0	0	0
Maximum Daily Limit	30	30	40	30	60	220

**RECOMMENDATION**

The proposed project is expected to comply with all applicable District Rules and Regulations. Since the proposed project is considered as a “de minimis significant permit revision”, it is exempt from the public participation requirements under Rule 3006 (b). A proposed permit incorporating this permit revision will be submitted to EPA for a 45-day review pursuant to Rule 3003(j). If EPA does not raise any objections within the review period, a revised Title V permit will be issued to this facility. This revision will include a Permit to Construct/Operate for the new 10-color IR dry press in Section D.