

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT ENGINEERING DIVISION APPLICATION PROCESSING AND CALCULATIONS	PAGES 21	PAGE 1
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QG Printing Corp.
6688 Box Springs Blvd.
Riverside, CA 92507
ID#: 132368

PERMIT TO CONSTRUCT

TITLE V PERMIT REVISION:

Application Number 555842

EQUIPMENT DESCRIPTION:

Application Number 555841(Replacement of Previous application 500852 & 500853):
LITHOGRAPHIC PRINTING SYSTEM NO. C7017 CONSISTING OF:

1. LITHOGRAPHIC PRESS, GOSS, MODEL C-700, SERIAL NO. C70-6089, 4-COLOR, 66-INCH WEB WIDTH, 2 X 300 HP MOTORS FOR 600 HP TOTAL.
2. OVEN, THERMO ELECTRON, MODEL NO. THERMO ELECTRON MODEL 3204, SERIAL NO. DT-97525-974725, NATURAL GAS FIRED, 66" ONE WEB, TWO ZONE, ATLAS DRYING SYSTEM., WITH TWO MAXON, CYCLOMAX, 3.5 MM BTU PER HOUR LOW NOX BURNERS, A 10 HP COMBUSTION AIR BLOWER, TWO 100 HP CIRCULATION FANS, AND A 10 HP EXHAUST FAN.
3. CHILL ROLL UNIT.

Recommendation:

Permit to Construct is recommended for application number 555841 subject to the following conditions:

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.
[RULE 204]
2. THIS EQUIPMENT SHALL BE PROPERLY MAINTAINED AND KEPT IN GOOD OPERATING CONDITION AT ALL TIMES.
[RULE 204]

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3. THIS EQUIPMENT SHALL NOT BE OPERATED UNLESS THE OVEN IS VENTED TO AN AIR POLLUTION CONTROL SYSTEM WHICH HAS BEEN ISSUED A VALID PERMIT BY THE EXECUTIVE OFFICER.
[RULE 1303(a)(1)-BACT]
4. MATERIALS USED IN THIS EQUIPMENT SHALL NOT CONTAIN ANY TOXIC AIR CONTAMINANTS IDENTIFIED IN RULE 1401, TABLE 1 WITH EFFECTIVE DATE OF SEPTEMBER 10, 2010 OR EARLIER, EXCEPT ETHYLENE GLYCOL MONOBUTYL ETHER (CAS NO. 111-76-2) AND ETHYLENE GLYCOL (CAS NO. 107-21-1).
[RULE 1401]
5. THE COMPOSITE VAPOR PRESSURE OF THE VOC IN THE BLANKET WASH AND ROLLER WASHES SHALL NOT EXCEED 6 MM HG AT 68 DEGREES FAHRENHEIT.
[RULE 1303(a)(1)-BACT]
6. THE VOC CONTENT OF THE FOUNTAIN SOLUTION USED IN THIS EQUIPMENT SHALL NOT EXCEED 8 % BY VOLUME, AS APPLIED, INCLUDING WATER AND EXEMPT SOLVENTS.
[RULE 1303(a)(1)-BACT]
7. THE OXIDES OF NITROGEN (NO_x) EMISSIONS DISCHARGED FROM THIS EQUIPMENT SHALL NOT EXCEED 30 PPMV, CALCULATED AS NO₂ ON A DRY BASIS AT 3 % OXYGEN AVERAGED OVER 15 CONSECUTIVE MINUTES.
[RULE 1303(a)(1)-BACT]
8. THE CARBON MONOXIDE (CO) EMISSIONS DISCHARGED FROM THIS EQUIPMENT SHALL NOT EXCEED 100 PPMV, CALCULATED ON A DRY BASIS AT 3 % OXYGEN AVERAGED OVER 15 CONSECUTIVE MINUTES.
[RULE 1303(a)(1)-BACT]
9. IN ADDITION TO RECORDKEEPING REQUIREMENTS IN RULE 109, THE OPERATOR SHALL KEEP ADEQUATE RECORDS FOR THIS EQUIPMENT FOR THE FOLLOWING:
 - A. DENSITY OF INKS, IN POUNDS PER GALLON.
 - B. PERCENTAGE BY WEIGHT OF LITHOGRAPHIC OILS IN EACH INK.
 - C. INK ABSORPTION FACTOR AS SPECIFIED BY CURRENT SCAQMD GUIDELINES.
 - D. VOC CONTENT OF FOUNTAIN SOLUTION, WASH MATERIALS, AND ANY OTHER MATERIALS, IN POUNDS PER GALLON, AS APPLIED, INCLUDING WATER AND PERCENT VOC BY VOLUME.
 - E. CALENDAR MONTHLY VOC EMISSIONS IN POUNDS.
 - F. OTHER DATA AS REQUIRED TO VERIFY COMPLIANCE WITH THE CONDITIONS SPECIFIED IN THIS PERMIT.

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ALL RECORDS SHALL BE PREPARED IN A FORMAT WHICH IS ACCEPTABLE TO THE DISTRICT, SHALL BE RETAINED ON THE PREMISES FOR AT LEAST FIVE YEARS, AND SHALL BE MADE A VAILABLE UPON REQUEST OF THE EXECUTIVE OFFICER OR HIS REPRESENTATIVE.

[RULE 109, 1303(b)(2)-OFFSET]

10. THE TOTAL QUANTITY OF NATURAL GAS USED IN THE LITHOGRAPHIC PRINTING SYSTEMS NO. 707 AND C7017 SHALL NOT EXCEED 4,154,250 CUBIC FEET IN ANY ONE CALENDAR MONTH.
[RULE 1303(b)(2)-OFFSET]
11. THE OPERATOR SHALL INSTALL AND MAINTAIN A NON-RESETTABLE TOTALIZING FUEL FLOW METER TO ACCURATELY INDICATE THE FUEL USAGE OF THE EQUIPMENT.
[RULE 1303(b)(2)-OFFSET]
12. THE OPERATOR SHALL KEEP ADEQUATE RECORDS TO DEMONSTRATE COMPLIANCE WITH THE NATURAL GAS FUEL USAGE LIMIT OF CONDITION NO. 10. SUCH RECORDS SHALL BE PREPARED IN A FORMAT WHICH IS ACCEPTABLE TO THE DISTRICT, SHALL BE RETAINED ON THE PREMISES FOR AT LEAST FIVE YEARS, AND SHALL BE MADE AVAILABLE UPON REQUEST OF THE EXECUTIVE OFFICER OR HIS REPRESENTATIVE.
[RULE 1303(b)(2)-OFFSET]
13. THE OPERATOR SHALL TEST THIS EQUIPMENT IN ACCORDANCE WITH THE FOLLOWING SPECIFICATIONS:
 - A. THE SOURCE TEST SHALL BE CONDUCTED NO LATER THAN 180 DAYS AFTER THE INITIAL START-UP OF THIS EQUIPMENT UNLESS OTHERWISE APPROVED IN WRITING BY THE DISTRICT.
 - B. A SOURCE TEST PROTOCOL SHALL BE SUBMITTED TO THE DISTRICT NO LATER THAN 60 DAYS AFTER THE INITIAL START-UP OF THIS EQUIPMENT UNLESS OTHERWISE APPROVED IN WRITING BY THE DISTRICT. THE TEST PROTOCOL SHALL BE APPROVED IN WRITING BY THE DISTRICT BEFORE THE TEST COMMENCES.
 - C. THE TEST PROTOCOL SHALL INCLUDE THE PROPOSED OPERATING CONDITIONS OF THE EQUIPMENT DURING THE TEST, THE IDENTITY OF THE TESTING LABORATORY, A STATEMENT FROM THE TESTING LABORATORY CERTIFYING THAT IT MEETS THE CRITERIA IN DISTRICT RULE 304(K), AND A DESCRIPTION OF THE SAMPLING AND ANALYTICAL PROCEDURES TO BE USED.
14. THE OPERATOR SHALL TEST THIS EQUIPMENT IN ACCORDANCE WITH THE FOLLOWING SPECIFICATIONS:

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- A. THE SOURCE TESTS SHALL CONSIST OF, BUT MAY NOT BE LIMITED TO, TESTING OF THE EQUIPMENT NOX AND CO EMISSIONS, REFERENCED AT 3 PERCENT VOLUME STACK GAS OXYGEN ON A DRY BASIS, IN PPMV AND LBS/HR.
- B. NOX AND CO EMISSION DETERMINATION SHALL BE AVERAGED OVER A PERIOD OF AT LEAST 15 MINUTES.
- C. A WRITTEN NOTICE OF THE SOURCE TESTS SHALL BE SUBMITTED TO THE DISTRICT AT LEAST 14 DAYS PRIOR TO THE SOURCE TESTING DATE SO THAT AN OBSERVER FROM THE DISTRICT MAY BE PRESENT.
- D. TWO COMPLETE COPIES OF THE SOURCE TEST REPORT SHALL BE SUBMITTED TO THE DISTRICT WITHIN 45 DAYS AFTER SOURCE TESTING DATE UNLESS OTHERWISE APPROVED IN WRITING BY THE DISTRICT. THE SOURCE TEST REPORT SHALL INCLUDE, BUT MAY NOT BE LIMITED TO, ALL TESTING DATA REQUIRED BY THIS CONDITION.
- E. A TESTING LABORATORY CERTIFIED BY THE CALIFORNIA AIR RESOURCES BOARD IN THE REQUIRED TEST METHODS FOR THE CRITERIA POLLUTANTS TO BE MEASURED, AND IN COMPLIANCE WITH DISTRICT RULE 304 (NO CONFLICT OF INTEREST) SHALL CONDUCT THE TEST.
- F. SAMPLING FACILITIES SHALL COMPLY WITH THE DISTRICT GUIDELINES FOR CONSTRUCTION OF SAMPLING AND TESTING FACILITIES, PURSUANT TO RULE 217.
- G. THE RESULTS OF ALL TESTS (INCLUDING PRELIMINARY TESTS) THAT ARE CONDUCTED ON THIS EQUIPMENT FOR INFORMATIONAL PURPOSES SHALL BE SUBMITTED TO THE DISTRICT WITHIN 45 DAYS AFTER THE TESTING DATE UNLESS OTHERWISE APPROVED IN WRITING BY THE DISTRICT.

EMISSIONS AND REQUIREMENTS:

- 15. THIS EQUIPMENT IS SUBJECT TO THE APPLICABLE REQUIREMENTS OF THE FOLLOWING RULES AND REGULATIONS:

VOC: RULE 109
VOC: RULE 1130, SEE APPENDIX B FOR EMISSION LIMITS
VOC: RULE 1171, SEE APPENDIX B FOR EMISSION LIMITS
CO: 2000 PPMV, RULE 407
CO: 100 PPMV, RULE 1303(a)(1)-BACT
NOx: 30 PPMV, RULE 1303(a)(1)-BACT
NOx: 30 PPMV, RULE 1147

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PM: 0.1 GR/SCF, RULE 409

PM: RULE 404, SEE APPENDIX B FOR EMISSION LIMITS

EQUIPMENT TO BE REMOVED

Application Number 500852 (Change of condition, p/n G2237, a/n 493466):

~~LITHOGRAPHIC PRINTING SYSTEM NO. 1 CONSISTING OF:~~

- ~~1. LITHOGRAPHIC PRESS MAG 1, GOSS, MODEL C 150 MAGNUM CLASS, SERIAL NO. C15 5006, 4 COLOR, 35 INCH WEB WIDTH, 100 HP TOTAL.~~
- ~~2. OVEN, TEC MODEL NO. 1 VC 135 40, SERIAL NO. 102125, NATURAL GAS FIRED, 7'-3" W. X 11'-3" L. X 4'-0" H., WITH A MAXON 1.6 MM BTU PER HOUR LOW NOX BURNER, A 5 HP COMBUSTION AIR BLOWER, A 40 HP CIRCULATION FAN, AND A 5 HP EXHAUST FAN.~~
- ~~3. CHILL ROLL UNIT.~~
- ~~4. ADHESIVE APPLICATOR.~~

Application Number 500853 (Change of condition, p/n G2238, a/n 493467):

~~LITHOGRAPHIC PRINTING SYSTEM NO. 2 CONSISTING OF:~~

- ~~1. LITHOGRAPHIC PRESS MAG 3, GOSS, MODEL C 150 MAGNUM CLASS, SERIAL NO. C15 5009, 4 COLOR, 35 INCH WEB WIDTH, 100 HP TOTAL.~~
- ~~2. OVEN, TEC MODEL NO. 1 VC 135 40, SERIAL NO. 102137, NATURAL GAS FIRED, 7'-3" W. X 11'-3" L. X 4'-0" H., WITH A MAXON 1.6 MM BTU PER HOUR LOW NOX BURNER, A 5 HP COMBUSTION AIR BLOWER, A 40 HP CIRCULATION FAN, AND A 5 HP EXHAUST FAN.~~
- ~~3. CHILL ROLL UNIT.~~
- ~~4. ADHESIVE APPLICATOR.~~

**PERMIT TO OPERATE
(Change of Condition)**

Application Number 555844 (Change of condition, a/n 500854493460):

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LITHOGRAPHIC PRINTING SYSTEM NO. 707, CONSISTING OF:

1. LITHOGRAPHIC PRINTING PRESS 707, GOSS, MODEL NO. C-700, WEB-FED, 4 X 4 COLOR, 66-INCH WIDTH, 400 HP TOTAL.
2. OVEN, MEGTEC, MODEL NO. ICP39168 COANDA PLUS, 34'-9" L. X 8'-0" W. X 4'-6" H., WITH TWO 3,230,000 BTU PER HOUR NATURAL GAS FIRED MAXON EB3MRV LOW NOX BURNERS, WITH TWO 10 HP COMBUSTION AIR BLOWERS, TWO 100-HP RECIRCULATION FANS, AND ONE 10-HP EXHAUST FAN.
3. CHILL ROLL UNIT.

Recommendation:

Permit to Operate is recommended for application number 555844 subject to the following conditions:

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.
[RULE 204]
2. THIS EQUIPMENT SHALL BE PROPERLY MAINTAINED AND KEPT IN GOOD OPERATING CONDITION AT ALL TIMES.
[RULE 204]
3. THIS EQUIPMENT SHALL NOT BE OPERATED UNLESS THE OVEN IS VENTED TO AN AIR POLLUTION CONTROL SYSTEM WHICH HAS BEEN ISSUED A VALID PERMIT BY THE EXECUTIVE OFFICER.
[RULE 1303(a)(1)-BACT]
4. THE TOTAL QUANTITY OF VOLATILE ORGANIC COMPOUNDS (VOC) EMISSIONS DISCHARGED TO THE ATMOSPHERE FROM THIS EQUIPMENT SHALL NOT EXCEED 900 POUNDS IN ANY CALENDAR MONTH. THE VOC EMISSIONS SHALL BE CALCULATED USING THE REQUIRED CONTROL EFFICIENCY SPECIFIED IN THE PERMIT FOR THE APC SYSTEM.
[RULE 212(c)(2)]
5. MATERIALS USED IN THIS EQUIPMENT SHALL NOT CONTAIN ANY TOXIC AIR CONTAMINANTS IDENTIFIED IN RULE 1401, TABLE 1 WITH EFFECTIVE DATE OF MARCH 4, 2005 OR EARLIER, EXCEPT ETHYLENE GLYCOL MONOBUTYL ETHER (CAS NO. 111-76-2), ETHYLENE GLYCOL (CAS NO. 107-21-1), AND NAPHTHALENE (CAS NO. 91-20-3).
[RULE 1401]

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6. THE COMPOSITE VAPOR PRESSURE OF THE VOC IN THE BLANKET WASH AND ROLLER WASHES SHALL NOT EXCEED 6 MM HG AT 68 DEGREES FAHRENHEIT.
[RULE 1303(a)(1)-BACT]
7. THE VOC CONTENT OF THE FOUNTAIN SOLUTION USED IN THIS EQUIPMENT SHALL NOT EXCEED 8 % BY VOLUME, AS APPLIED, INCLUDING WATER AND EXEMPT SOLVENTS.
[RULE 1303(a)(1)-BACT]
8. THE OXIDES OF NITROGEN (NO_x) EMISSIONS DISCHARGED FROM THIS EQUIPMENT SHALL NOT EXCEED 30 PPMV, CALCULATED AS NO₂ ON A DRY BASIS AT 3 % OXYGEN AVERAGED OVER 15 CONSECUTIVE MINUTES.
[RULE 1303(a)(1)-BACT]
9. IN ADDITION TO RECORDKEEPING REQUIREMENTS IN RULE 109, THE OPERATOR SHALL KEEP ADEQUATE RECORDS FOR THIS EQUIPMENT FOR THE FOLLOWING:
 - A. DENSITY OF INKS, IN POUNDS PER GALLON.
 - B. PERCENTAGE BY WEIGHT OF LITHOGRAPHIC OILS IN EACH INK.
 - C. INK ABSORPTION FACTOR AS SPECIFIED BY CURRENT SCAQMD GUIDELINES.
 - D. VOC CONTENT OF FOUNTAIN SOLUTION, WASH MATERIALS, AND ANY OTHER MATERIALS, IN POUNDS PER GALLON, AS APPLIED, INCLUDING WATER AND PERCENT VOC BY VOLUME.
 - E. CALENDAR MONTHLY VOC EMISSIONS IN POUNDS.
 - F. OTHER DATA AS REQUIRED TO VERIFY COMPLIANCE WITH THE CONDITIONS SPECIFIED IN THIS PERMIT.

ALL RECORDS SHALL BE PREPARED IN A FORMAT WHICH IS ACCEPTABLE TO THE DISTRICT, SHALL BE RETAINED ON THE PREMISES FOR AT LEAST FIVE YEARS, AND SHALL BE MADE A VAILABLE UPON REQUEST OF THE EXECUTIVE OFFICER OR HIS REPRESENTATIVE.
[RULE 109, 1303(b)(2)-OFFSET]

10. THE TOTAL QUANTITY OF NATURAL GAS USED IN THE LITHOGRAPHIC PRINTING SYSTEMS ~~NO. 1, NO. 2 AND NO. 707~~ AND C7017 SHALL NOT EXCEED 4,154,250 CUBIC FEET IN ANY ONE CALENDAR MONTH.
[RULE 1303(b)(2)-OFFSET]
11. THE OPERATOR SHALL INSTALL AND MAINTAIN A NON-RESETTING TOTALIZING FUEL FLOW METER TO ACCURATELY INDICATE THE FUEL USAGE OF THE EQUIPMENT.
[RULE 1303(b)(2)-OFFSET]

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12. THE OPERATOR SHALL KEEP ADEQUATE RECORDS TO DEMONSTRATE COMPLIANCE WITH THE NATURAL GAS FUEL USAGE LIMIT OF CONDITION NO. 10. SUCH RECORDS SHALL BE PREPARED IN A FORMAT WHICH IS ACCEPTABLE TO THE DISTRICT, SHALL BE RETAINED ON THE PREMISES FOR AT LEAST FIVE YEARS, AND SHALL BE MADE AVAILABLE UPON REQUEST OF THE EXECUTIVE OFFICER OR HIS REPRESENTATIVE.
[RULE 1303(b)(2)-OFFSET]

EMISSIONS AND REQUIREMENTS:

13. THIS EQUIPMENT IS SUBJECT TO THE APPLICABLE REQUIREMENTS OF THE FOLLOWING RULES AND REGULATIONS:

VOC: RULE 109
VOC: RULE 1130, SEE APPENDIX B FOR EMISSION LIMITS
VOC: RULE 1171, SEE APPENDIX B FOR EMISSION LIMITS
CO: 2000 PPMV, RULE 407
NOx: 30 PPMV, RULE 1303(a)(1)-BACT
NOx: 30 PPMV, RULE 1147
PM: 0.1 GR/SCF, RULE 409
PM: RULE 404, SEE APPENDIX B FOR EMISSION LIMITS

PERMIT TO CONSTRUCT

Application Number 555843(PREVIOUS APPLICATION NO. 500855)
MODIFICATION TO THE EXISTING AIR POLLUTION CONTROL SYSTEM CONSISTING OF:

1. THERMAL OXIDIZER, RTO NO. 1, REGENERATIVE TYPE, ADVANTAGE ENERGY GROUP, MODEL PREMIER-30, 63'-0" L. X 24'-0" W. X 12'-0" H., 30,000 SCFM CAPACITY, WITH AN 8.6 MMBTU/HR BURNER, A 4.5 MMBTU/HR GAS INJECTION SYSTEM, TWO CERAMIC BEDS (19'-0"L. X 10'-0" W. X 4'-0"H. EACH), A 20 HP COMBUSTION BLOWER.AND A COIL MEDIA HEAT EXCHANGER.
2. THERMAL OXIDIZER, RTO NO. 2, REGENERATIVE TYPE, LANGBEIN & ENGELBRACHT AMERICA, MODEL NO. TR1595C, SERIAL NO. 1062-06, 16'-4" W. X 40'-6" L. X 17'-9" H., 15,000 SCFM CAPACITY, WITH TWO 8'-8" W. X 8'-8" L. X 5'-0" H. CERAMIC BEDS, ONE 3,000,000 MAXON KINEMAX 3-KM BURNER, AND ONE 1.2 HP COMBUSTION BLOWER.
3. EXHAUST SYSTEM WITH ONE 200-HP AND ONE 150-HP FAN VENTING TEN LITHOGRAPHIC PRINTING OVENS.

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BY THE REMOVAL OF:

1. TWO LITHOGRAPHIC PRINTING OVENS FROM THE EXHAUST

BY THE ADDITION OF:

1. A NEW LITHOGRAPHIC PRINTING OVEN TO THE EXHAUST RESULTING IN NINE OVENS TOTAL BEING VENTED.

Recommendation:

Permit to Construct is recommended for application number 555843 subject to the following conditions:

Conditions:

1. OPERATION OF THIS EQUIPMENT SHALL BE CONDUCTED IN COMPLIANCE WITH ALL DATA AND SPECIFICATIONS SUBMITTED WITH THE APPLICATION UNDER WHICH THIS PERMIT IS ISSUED UNLESS OTHERWISE NOTED BELOW.
[RULE 204]
2. THIS EQUIPMENT SHALL BE PROPERLY MAINTAINED AND KEPT IN GOOD OPERATING CONDITION AT ALL TIMES.
[RULE 204]
3. THE OPERATOR SHALL OPERATE AND MAINTAIN THE THERMAL OXIDIZERS ACCORDING TO THE FOLLOWING REQUIREMENTS:

THE COMBUSTION CHAMBER TEMPERATURE SHALL BE MAINTAINED AT A MINIMUM OF 1,550 DEGREES FAHRENHEIT WHENEVER THE EQUIPMENT IT SERVES IS IN OPERATION.

THE OPERATOR SHALL OPERATE AND MAINTAIN A TEMPERATURE MEASURING AND RECORDING SYSTEM TO CONTINUOUSLY MEASURE AND RECORD THE COMBUSTION CHAMBER TEMPERATURE PURSUANT TO THE OPERATION AND MAINTENANCE REQUIREMENTS SPECIFIED IN 40 CFR PART 64.7. SUCH A SYSTEM SHALL HAVE AN ACCURACY OF WITHIN 1% OF THE TEMPERATURE BEING MONITORED AND SHALL BE INSPECTED, MAINTAINED, AND CALIBRATED ON AN ANNUAL BASIS IN ACCORDANCE WITH THE MANUFACTURER'S SPECIFICATIONS.

FOR THE PURPOSE OF THIS CONDITION, A DEVIATION SHALL BE DEFINED AS WHEN A COMBUSTION CHAMBER TEMPERATURE OF LESS THAN 1,550 DEGREES FAHRENHEIT OCCURS DURING NORMAL OPERATION OF THE EQUIPMENT IT SERVES. THE OPERATOR SHALL REVIEW THE RECORDS OF THE COMBUSTION CHAMBER TEMPERATURE ON A DAILY BASIS TO DETERMINE IF A DEVIATION

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OCCURS OR SHALL INSTALL AN ALARM SYSTEM TO ALERT THE OPERATOR WHEN A DEVIATION OCCURS.

WHENEVER A DEVIATION OCCURS, THE OPERATOR SHALL INSPECT THIS EQUIPMENT TO IDENTIFY THE CAUSE OF SUCH A DEVIATION, TAKE IMMEDIATE CORRECTIVE ACTION TO MAINTAIN THE COMBUSTION CHAMBER TEMPERATURE AT OR ABOVE 1,550 DEGREES FAHRENHEIT, AND KEEP RECORDS OF THE DURATION AND CAUSE (INCLUDING UNKNOWN CAUSE, IF APPLICABLE) OF THE DEVIATION AND THE CORRECTIVE ACTION TAKEN.

ALL DEVIATIONS SHALL BE REPORTED TO THE AQMD PURSUANT TO THE REQUIREMENTS SPECIFIED IN 40 CFR PART 64.9 AND CONDITION NOS. 22 AND 23 IN SECTION K OF THIS PERMIT. THE REPORT SHALL INCLUDE THE TOTAL OPERATING TIME OF THIS EQUIPMENT AND THE TOTAL ACCUMULATED DURATION OF ALL DEVIATIONS FOR EACH SEMI-ANNUAL REPORTING PERIOD SPECIFIED IN CONDITION NO. 23 IN SECTION K OF THIS PERMIT.

THE OPERATOR SHALL SUBMIT AN APPLICATION WITH A QUALITY IMPROVEMENT PLAN (QIP) IN ACCORDANCE WITH 40 CFR PART 64.8 TO THE AQMD IF AN ACCUMULATION OF DEVIATIONS EXCEEDS 5 PERCENT DURATION OF THIS EQUIPMENT'S TOTAL OPERATING TIME FOR ANY SEMI-ANNUAL REPORTING PERIOD SPECIFIED IN CONDITION NO. 23 IN SECTION K OF THIS PERMIT. THE REQUIRED QIP SHALL BE SUBMITTED TO THE AQMD WITHIN 90 CALENDAR DAYS AFTER THE DUE DATE FOR THE SEMI-ANNUAL MONITORING REPORT.

THE OPERATOR SHALL INSPECT AND MAINTAIN ALL COMPONENTS OF THIS EQUIPMENT ON AN ANNUAL BASIS IN ACCORDANCE WITH THE MANUFACTURER'S SPECIFICATIONS.

THE OPERATOR SHALL KEEP ADEQUATE RECORDS IN A FORMAT THAT IS ACCEPTABLE TO THE AQMD TO DEMONSTRATE COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS SPECIFIED IN THIS CONDITION AND 40 CFR PART 64.9 FOR A MINIMUM OF FIVE YEARS.

[RULE 1303(a)(1)-BACT, RULE 3004(a)(4)-PERIODIC MONITORING, 40CFR PART 64]

4. THE TEMPERATURE INDICATING AND RECORDING SYSTEM SHALL BE IN OPERATION WHENEVER THE EQUIPMENT IT SERVES IS IN OPERATION.
[RULE 1303(a)(1)-BACT]
5. THE OPERATOR SHALL OPERATE AND MAINTAIN THIS EQUIPMENT TO ACHIEVE DESTRUCTION EFFICIENCY OF AT LEAST 99 % BY WEIGHT WHENEVER THE EQUIPMENT IT SERVES IS IN OPERATION.
[RULE 1303(b)(2)-OFFSET]

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6. THE OPERATOR SHALL OPERATE AND MAINTAIN THIS EQUIPMENT TO ACHIEVE AN OVERALL CONTROL EFFICIENCY OF AT LEAST 98.5 %.
[RULE 1303(a)(1)-BACT, 1303(b)(2)-OFFSET]
7. THE TOTAL EXHAUST VOLUME DIRECTED TO RTO NO. 1 SHALL NOT EXCEED 30,000 SCFM.
[RULE 1303(a)(1)-BACT, 1303(b)(2)-OFFSET]
8. THE TOTAL EXHAUST VOLUME DIRECTED TO RTO NO. 2 SHALL NOT EXCEED 15,000 SCFM.
[RULE 1303(a)(1)-BACT, 1303(b)(2)-OFFSET]
9. THE OPERATOR SHALL PERFORM AN ANNUAL TEST TO VERIFY EXHAUST FLOW RATE FOR EACH OVEN VENTED TO THE AIR POLLUTION CONTROL SYSTEM.
[RULE 1303(a)(1)-BACT, 1303(b)(2)-OFFSET]
10. THE OPERATOR SHALL MAINTAIN A LOG FOR THE RTO'S OPERATION. THE LOG SHALL IDENTIFY WHICH OVENS, THEIR RESPECTIVE EXHAUST VOLUME AND THE TOTAL SCFM THAT IS VENTED TO THE RTO'S.
[RULE 1303(a)(1)-BACT, 1303(b)(2)-OFFSET]
11. THE EXHAUST VOLUME DIRECTED TO EACH RTO SHALL BE MONITORED AND DISPLAYED TO INDICATE THE TOTAL VOLUME WHEN IN OPERATION.
[RULE 1303(a)(1)-BACT, 1303(b)(2)-OFFSET]
12. RECORDS SHALL BE MAINTAINED TO DEMONSTRATE COMPLIANCE WITH CONDITIONS NO. 7, 8, 9, 10 AND 11.
[RULE 1303(a)(1)-BACT, 1303(b)(2)-OFFSET]
- ~~7. THERMAL OXIDIZERS SHALL BE IN FULL OPERATION WHENEVER THE BASIC EQUIPMENT THEY SERVE IS IN OPERATION.~~
[RULE 1303(a)(1)-BACT, 1303(b)(2)-OFFSET]
13. THE OXIDES OF NITROGEN (NO_x) EMISSIONS DISCHARGED FROM THIS EQUIPMENT SHALL NOT EXCEED 78 PPMV, CALCULATED AS NO₂ ON A DRY BASIS AT 3 % OXYGEN AVERAGED OVER 60 CONSECUTIVE MINUTES.
[RULE 1303(b)(2)-OFFSET]
14. THE OWNER OR OPERATOR OF THIS EQUIPMENT SHALL CONDUCT SOURCE TESTS UNDER THE FOLLOWING CONDITIONS:

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- A. THE SOURCE TESTS SHALL BE CONDUCTED NO LATER THAN 180 DAYS AFTER THE INITIAL START-UP OF THIS EQUIPMENT UNLESS OTHERWISE APPROVED IN WRITING BY THE DISTRICT.
- B. A SOURCE TEST PROTOCOL SHALL BE SUBMITTED TO THE DISTRICT NO LATER THAN 60 DAYS AFTER THE INITIAL START-UP OF THIS EQUIPMENT UNLESS OTHERWISE APPROVED IN WRITING BY THE DISTRICT. THE TEST PROTOCOL SHALL BE APPROVED IN WRITING BY THE DISTRICT BEFORE THE TEST COMMENCES. THE TEST PROTOCOL SHALL INCLUDE THE COMPLETED DISTRICT FORMS ST-1 AND ST-2 SPECIFYING THE PROPOSED OPERATING CONDITIONS OF THE EQUIPMENT DURING THE TEST, THE IDENTITY OF THE TESTING LABORATORY, A STATEMENT FROM THE TESTING LABORATORY CERTIFYING IT MEETS THE CRITERIA IN DISTRICT RULE 304(k), AND A DESCRIPTION OF THE SAMPLING AND ANALYTICAL PROCEDURES TO BE USED.
- C. THE SOURCE TESTS SHALL CONSIST OF, BUT MAY NOT BE LIMITED TO, TESTING AT THE INLET AND THE EXHAUST OF THE RTO'S FOR:
- (1)VOLATILE ORGANIC COMPOUND (VOC) IN PPMV AND LBS/HR
 - (2)OXIDES OF NITROGEN (RTO EXHAUST) IN PPMV AND LBS/HR
 - (3)CARBON MONOXIDE (AFTERBURNER EXHAUST) IN PPMV AND LBS/HR
 - (4)VOC DESTRUCTION EFFICIENCY
 - (5)VOC COLLECTION EFFICIENCY
 - (6)USAGE OF ALL VOC-CONTAINING MATERIALS DURING THE TEST (MASS BALANCE)
 - (7)OXYGEN CONTENT
 - (8)MOISTURE CONTENT
 - (9)FLOW RATE
 - (10)TEMPERATURE

THE TEST SHALL BE CONDUCTED USING DISTRICT APPROVED METHODS AND DISTRICT APPROVED AVERAGING TIME.
[RULE 1303(a)(1)-BACT]

PERIODIC MONITORING:

15. THE OPERATOR SHALL CONDUCT SOURCE TEST(S) IN ACCORDANCE WITH THE FOLLOWING SPECIFICATIONS:
- A. THE TEST SHALL BE CONDUCTED AT LEAST ONCE DURING THE LIFE OF THE PERMIT.
 - B. THE TEST SHALL BE CONDUCTED NO LATER THAN JULY 31, 2017 UNLESS

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OTHERWISE APPROVED IN WRITING BY THE DISTRICT.

- C. THE TEST SHALL BE CONDUCTED TO DETERMINE THE VOC EMISSIONS USING AN APPROVED DISTRICT METHOD TO DEMONSTRATE COMPLIANCE WITH ALL APPLICABLE PERMIT CONDITION(S), RULES AND REGULATIONS.
- D. THE SOURCE TEST SHALL BE CONDUCTED WHILE THE OXIDIZER IS OPERATING AT A TEMPERATURE OF NOT LESS THAN THE MINIMUM OPERATING TEMPERATURE SPECIFIED IN THIS PERMIT. IF THE OPERATING TEMPERATURE DURING THE SOURCE TEST IS GREATER THAN THE MINIMUM OPERATING TEMPERATURE SPECIFIED IN THIS PERMIT, THE MINIMUM OPERATING TEMPERATURE SPECIFIED IN THIS PERMIT MAY BE INCREASED TO REFLECT THE OPERATING TEMPERATURE DURING THE SOURCE TEST.
- E. THE OPERATOR SHALL COMPLY WITH ADMINISTRATIVE CONDITIONS NOS. 8, 9, AND 10 OF SECTION E OF THIS FACILITY PERMIT.
- F. THE OPERATOR SHALL SUBMIT TWO COMPLETE COPIES OF THE SOURCE TEST REPORT SPECIFIED IN CONDITION NO. 9 OF SECTION E OF THIS FACILITY PERMIT TO THE DISTRICT ENGINEERING AND COMPLIANCE DIVISION. THE ENGINEERING COPY OF THE REPORT SHALL BE SENT TO: SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT, COATING, PRINTING AND AEROSPACE OPERATIONS, ATTN: AIR QUALITY AND COMPLIANCE SUPERVISOR, 21865 COPLEY DRIVE, DIAMOND BAR, CA 91765. THE COMPLIANCE COPY OF THE REPORT SHALL BE SENT TO: SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT, P.O. BOX 4941, DIAMOND BAR, CA 91765.
[RULE 3004 (a)(4)]

EMISSIONS AND REQUIREMENTS:

- 16. THIS EQUIPMENT IS SUBJECT TO THE APPLICABLE REQUIREMENTS OF THE FOLLOWING RULES AND REGULATIONS:

CO: 2000 PPMV, RULE 407
PM: 0.1 GR/SCF, RULE 409
PM: RULE 404, SEE APPENDIX B FOR EMISSION LIMITS
NOX: 78 PPMV, RULE 1303(B)(2)-OFFSET
NOX: 60 PPMV, RULE 1147

BACKGROUND

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QG Printing is a Title V facility. A Title V renewal permit under application no. 540658 was issued to this facility on 8/13/13. QG Printing has proposed to revise their Title V permit with a/n 555842 by replacing two litho presses with a new one, changing the condition of the existing press system #707 to remove system #1 and system #2 from the natural gas cap and add the new press C7017. The Regenerative Thermal Oxidizer (RTO) is also to be modified to reflect the changes to the exhaust by removing the two existing presses, system #1 & #2, and adding the new press, C7017, to the exhaust. QG Printing also requested that condition no. 9 on the RTO permit be amended to allow a single RTO to operate when a limited number of presses are operating.

A source test was conducted to determine the NOx, CO and overall destruction efficiency of the dual RTOs on May 21, 2009. The NOx concentrations @ 3% oxygen were determined to be 26.1ppm for the small RTO and 27.2 ppm for the large RTO. The CO concentration @ 3% oxygen was determined to be 21.7 ppm for the small RTO and 3.33ppm for the large RTO. The destruction efficiency was 99.8% with a collection of 99.5 % for an overall destruction efficiency of 99.3%.

No citizen nuisance complaints have been filed on this facility. On 4/06/12 a Notice of Violation(P58349) was issued to the facility for failing to submit a timely Title V application. Application 540658 was submitted and compliance with this NOV achieved. Notice to Comply (E18571) was issued on 2/14/2013 to require QG Printing to file a name change application. Application 550416 was submitted and the name of the facility changed from Quebecor World Great Western Publishing to QG Printing Corp on their Title V facility permit. There are no other Complaints, Notices of Violation or Notices to Comply on record against this facility over the last two years as of 10/09/2013.

The permit revision is considered as a “de minimis significant permit revision” to the Title V renewal permit, as described in Regulation XXX evaluation.

PROCESS DESCRIPTION

QG Printing is a large lithographic printing business that prints various inserts, publications, magazines and books. The company is currently operating ten lithographic printing presses. After the proposed modifications, QG Printing will be operating nine lithographic printing presses. The inks are all oil based which are heat set and the presses are all equipped with natural gas fired dryers. The drying ovens are vented to two regenerative thermal oxidizers (RTO). The heatset inks have a retention factor of 20%, so 80% of the VOC emissions from the inks will be vented from the dryers to the RTO. QG Printing operates under facility-wide VOC and NOx emission caps of 7,800 lb/month and 667 lb/month, respectively. The facility operates 24 hrs/day, 7 days/week and 52 weeks/year.

EMISSION ESTIMATES

The facility has a VOC cap of 7,800 lbs per month.

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Currently 10 presses in operation:
 $(7,800 \text{ lbs/month}) / (30 \text{ days/month}) = 260 \text{ lbs/day}$
 $(260 \text{ lbs/day}) / (10 \text{ presses}) = 26 \text{ lbs VOC/press}$

The removal of two presses would be an average of 52 lbs VOC per day. With the new press the total number of presses would be nine.
 $(260 \text{ lbs VOC/day}) / (9) = 28.9 \text{ lbs VOC/day average.}$

The new press will have the following emissions:
 $(28.9 \text{ lbs VOC/day}) / (24 \text{ hrs/day}) = 1.20 \text{ lbs VOC/hr.}$

Previous Combustion Emissions:(Each Oven)

1.6 mmbtu/hr, 1.524x10E-3mmcuft/hr
NOx: 30 ppm – 38.87 lbs/mmcuft
CO: 100 ppm – 78.81 lbs/mmcuft

	Emission Factor lbs/mmcf	Hourly Emissions lbs/hr	Daily Emissions lbs/day	Annual Emissions lbs/yr
ROG	7.0	0.011	0.26	93.2
NOX	38.87	0.059	1.42	517.44
SOX	0.83	0.0013	0.030	11.05
CO	78.81	0.12	2.88	1,048.32
PM10	7.6	0.012	0.28	101.17
GHG				
CO ₂	1.6 mmbtu/hr (116.89lbs/mmbtu) = 187.02 lbs CO ₂ /hr, 4,488.6 lbs CO ₂ /day			
CH ₄	1.6 mmbtu/hr (0.002lbs/mmbtu) = 0.0032 lbs CH ₄ /hr, 0.08 lbs CH ₄ /day			

New Oven Emissions:

7.0 mmbtu/hr, 6.67x10E-3mmcuft/hr
NOx: 30 ppm – 38.87 lbs/mmcuft
CO: 100 ppm – 78.81 lbs/mmcuft

	Emission Factor lbs/mmcf	Hourly Emissions lbs/hr	Daily Emissions lbs/day	Annual Emissions lbs/yr
ROG	7.0	0.047	1.12	407.68
NOX	38.87	0.259	6.21	2,263.79
SOX	0.83	0.0055	0.133	48.34
CO	78.81	0.525	12.61	4,589.89
PM10	7.6	0.051	1.22	442.62
GHG				
CO ₂	7.0 mmbtu/hr(116.89lbs/mmbtu) = 818.23 lbs CO ₂ /hr, 19,637.5 lbs CO ₂ /day			

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CH4 7.0 mmbtu/hr(0.002lbs/mmbtu) = 0.014 lbs CH₄/hr, 0.34 lbs CH₄/day

In order to avoid a particulate matter (PM10) emission increase with the simultaneous operation of litho presses system no. 1, 2 & 707, a monthly natural gas usage limit was established. The limit was established under applications 500852-500854. System #1 & #2, a/n 500852 & 500853) which will be replaced by application no 555841, press C7017. The emission factors are the same for the remaining two presses (systems C707 & C7017). The fuel usage limit of 4,154,250 ft³/month will prevent a combustion emission increase and with the facility VOC cap, there will be no emission increase by the replacement of the two existing presses with this new one.

RISK ASSESSMENT

Fountain Solution contains:

Glycol Ether EB CAS# 111-76-2
Ethylene Glycol CAS# 107-21-1

Maximum usage of fountain solution - 25 gallons Etch/day

Assume VOC content = toxic contaminants

24 hrs/day, 7 day/week, 52week/year

1.08 lbsVOC/gal)(25 gal/day) = 27.0 lbs VOC/day, 1.13 lbs/hr uncontrolled

This equipment passes Tier 1 Screen Risk Assessment with an uncontrolled emission 1.13 lbs each toxic/hr with the following results:

Tier 1 results:

Cancer/Chronic	Acute ASI
2.85E-01	8.08 E-02
Passes	Passes

Rule Evaluaton

Rule 212 (c)(1):This section requires a public notice for all new or modified permit units that emit air contaminants located within 1,000 feet from the outer boundary of a school.
No school is located within 1,000 ft from the above site.

Rule 212 (c)(2):This section requires a public notice for all new or modified facilities that have on-site emission increases exceeding any of the daily maximums as specified by Rule 212(g).
The proposed project will not result in a facility wide emission increase in excess of the daily maximums specified in 212(g). A Rule 212(c) (2) notice will not be triggered.

Rule 212(c)(3):This section requires a public notice for all new or modified permit unit with increases in emissions of toxic air contaminants listed in Table I of Rule 1401 resulting in MICR greater than 1E-6 per permit unit or greater than 10E-6 per facility or any increase in health risk.

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The proposed project will not result in an increased risk. Public notice is not required under this section of the rule.

Rule 212(g): This section requires a public notice for all new or modified sources that result in emission increases exceeding any of the daily maximums as specified by Rule 212(g).

The replacement of the two existing printing presses with the new one will not represent an emission increase since the facility has a VOC cap and the combustion emissions are capped by the natural gas usage. In addition, the estimated emission from the new press of 28.9 lbs/day is less than the 52 lbs/day for the two presses that are being removed. The proposed project will not exceed the Maximum Daily Emissions limit as summarized below:

	Maximum Daily Emissions					
	<u>ROG</u>	<u>NO_x</u>	<u>PM₁₀</u>	<u>SO₂</u>	<u>CO</u>	<u>Pb</u>
Emission increase	0	0	0	0	0	0
MAX Limit (lb/day)	30	40	30	60	220	3
Compliance Status	Yes	Yes	Yes	Yes	Yes	Yes

A public notice is not required since the new press will not have an emission increase that will exceed the daily VOC maximum.

Rule 401: With proper operation and maintenance compliance with this rule is expected.

Rule 402: With proper operation and maintenance compliance with this rule is expected.

Rule 1130: (1) VOC Content of Graphic Arts Materials
No person shall apply any graphic arts material, including any VOC-containing materials added to the original graphic arts materials, which contains a total VOC in excess of the limits specified below:

GRAPHIC ARTS MATERIAL	VOC LIMIT Grams per Liter of Coating (or Ink or Adhesive), Less <u>Water and Less Exempt Compounds</u> (October 8, 1999)	<u>Effective January</u> <u>1, 2000</u>
Lithographic Ink	300	300

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The VOC content of the Lithographic inks range from 52.8 to 205 gm/lt. The rule limit is 300 gm/lt unless they employ an approved air pollution control system.

The facility will have essentially two oxidizers. Since BACT will be employed compliance with this rule is expected.

The new lithographic printing press will be replacing two existing controlled presses. The new press is vented to an RTO with a demonstrated overall control of 98.5%.

Highest non-compliant coating 553gm/lt

Density of IPA 6.6 lbs/gal, 792 gm/lt

Required overall control efficiency:

$$CE = [1 - ((300\text{gm/lt}/553\text{gm/lt})(1 - 553\text{gm/lt}/792\text{gm/lt}) / (1 - 300\text{gm/lt}/880\text{gm/lt}))]$$

$$CE = [1 - (0.542 \times (1 - 0.698)) / (1 - 0.341)] \times 100$$

$$CE = 75.16\%$$

The control system is expected to achieve a 98.5% overall control. Compliance with this rule is expected.

(2) **VOC Content of Fountain Solution**

Through December 31, 1999, no person shall apply in any graphic arts operation any fountain solution, including any VOC-containing materials added to the original fountain solution, which contains a total VOC in excess of 100 grams per liter of material. Effective January 1, 2000, the VOC content of fountain solution, including any VOC containing material added to the original fountain solution as applied, shall be:

(A) no greater than 80 grams per liter of material, or

(B) no greater than 100 grams per liter of material, if a refrigerated chiller is used.

The fountain solution will be mixed in a ratio that will meet these requirements. Compliance with this rule is expected.

(3) **Solvent Cleaning Operations; Storage and Disposal of VOC-containing Materials.**

Solvent cleaning of application equipment, parts, products, tools, machinery, equipment, general work areas, and the storage and disposal of VOC-containing materials used in cleaning operations shall be carried out pursuant to Rule 1171 - Solvent Cleaning Operations

Rule 1147: The oven for the new lithographic printing press is equipped with a low NOx burner which should meet the 30 ppmv requirement of this rule. Testing shall be performed to demonstrate compliance. The existing oven is already compliant with the 30 ppmv NOx requirement. The RTO's are subject to this rule which have shown to have a NOx concentration of less than 60 ppmv.

Rule 1171: The Roller wash/blanket wash and system wash used for this equipment has a VOC content of 0.78 lbs/gallon which will comply with the Rule 1171 requirements.

REG XIII: New Source Review.

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1303 States that a new permit unit must meet each of the following requirements if there is an emission increase:

1) BACT
 BACT requirements for the printing presses are satisfied by the imposition of the 8.0 vol% limitation on the fountain solution and the requirement that the VOC composite vapor pressure of the blanket and roller washes do not exceed 6 mmHg. The VOC emissions are vented to the RTO's which will satisfy BACT. The new oven has a Low-NOx burner which complies with the BACT requirements for a natural gas fired oven.

2) Modeling:
 The new oven emissions @ 6.46 mm btu/hr

	NOx	CO	PM10
>5 <10	0.47	25.9	2.8
New oven	0.26	0.53	0.05
	Pass	Pass	Pass

There are no modeling requirements for VOC emissions.

3) Emission Offsets:
 The proposed project will not result in a VOC, NOx or PM10 emission increase for the facility. Offsets are not required.

4) Facility Compliance:
 This facility is currently in compliance with all applicable District Rules and Regulations.

5) Major Polluting Facilities:
 This facility is not a major modification to a major polluting facility.

Rule 1401: Toxics: Rule 1401 contains the following requirements:

- 1) (d)(1) MICR and Cancer Burden - The cumulative increase in MICR which is the sum of the calculated MICR values for all toxic air contaminants emitted from the new, relocated or modified permit unit will not result in any of the following:
 - (A) an increased MICR greater than one in one million (1.0×10^{-6}) at any receptor location, if the permit unit is constructed without T-BACT;
 - (B) an increased MICR greater than ten in one million (1.0×10^{-5}) at any receptor location, if the permit unit is constructed with T-BACT;
 - (C) a cancer burden greater than 0.5.
- 2) (d)(2) Chronic Hazard Index - The cumulative increase in total chronic HI for any target organ system due to total emissions from the new, relocated or modified permit unit will not exceed 1.0 at any receptor location.
- 3) (d)(3) Acute Hazard Index - The cumulative increase in total acute HI for any target organ system due to total emissions from the new, relocated or modified permit unit will not exceed 1.0 at any receptor location.

This equipment passes Tier 1 Screen Risk Assessment with an uncontrolled emission 1.13 lbs each toxic/hr with the following results:

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Tier 1 results:

Cancer/Chronic	Acute ASI
2.85E-01	8.08 E-02
Passes	Passes

REGULATION XXX:

This facility is not in the RECLAIM program. The proposed project is considered as a “de minimis significant permit revision” for non-RECLAIM pollutants or hazardous air pollutants (HAPs) to the Title V permit for this facility.

Non-RECLAIM Pollutants or HAPs

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 HAPs from these permit revisions during the term of the permit are not greater than any of the following emission threshold levels:

Air Contaminant	Daily Maximum (lbs/day)
HAP	30
VOC	30
NO _x *	40
PM10	30
SO _x *	60
CO	220

* Not applicable if this is a RECLAIM pollutant

To determine if a project is considered as a “de minimis significant permit revision” for non-RECLAIM pollutants or HAPs, emission increases for non-RECLAIM pollutants or HAPs resulting from all permit revisions that are made after the issuance of the Title V renewal permit shall be accumulated and compared to the above threshold levels. This proposed project is the 1st permit revision to the Title V renewal permit issued to this facility on August 13, 2013. The following table summarizes the cumulative emission increases resulting from all permit revisions since the Title V renewal permit was issued:

Revision	HAP	VOC	NO _x *	PM10	SO _x	CO
1 st Permit Revision: replace two existing presses with a new press & modify thermal oxidizer	0	0	0	0	0	0
Cumulative Total	0	0	0	0	0	0
Maximum Daily	30	30	40*	30	60	220

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* RECLAIM pollutant, not subject to emission accumulation requirements
Since the cumulative emission increases resulting from all permit revisions are not greater than any of the emission threshold levels, this proposed project is considered as a “de minimis significant permit revision” for non-RECLAIM pollutants or HAPs.

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” for non-RECLAIM pollutants, 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.

Conclusion:

This equipment will operate in compliance with all District Rule and Regulations. Permits to Construct are recommended for application numbers 555841, 555843 and 555844 subject to preceding conditions.