



MAY 25 2010

Roger Ashlock
Worldcolor (USA), LLC
2201 Cooper Avenue
Merced, CA 95348

**Re: Notice of Minor Title V Permit Modification
District Facility # N-1646
Project # N-1093771**

Dear Mr. Ashlock:

Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued N-1646-37-1 into the Title V operating permit. Install a new heatset offset lithographic printing press #522 served by a facility shared 5.728 MMBtu/hr Megtec Cleanswitch regenerative thermal oxidizer.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued N-1646-37-1, emission increases, and application. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Rupi Gill at (209) 557-6400.

Sincerely,

David Warner
Director of Permit Services

DW: KC/cm

Enclosures

Seyed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: 661-392-5500 FAX: 661-392-5585



MAY 25 2010

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

**Re: Notice of Minor Title V Permit Modification
District Facility # N-1646
Project # N-1093771**

Dear Mr. Rios:

Enclosed for you to review is an application for minor Title V permit modification for the facility identified above. Worldcolor (USA), LLC is proposing a Title V minor permit modification to incorporate the recently issued N-1646-37-1 into the Title V operating permit. Install a new heatset offset lithographic printing press #522 served by a facility shared 5.728 MMBtu/hr Megtec Cleanswitch regenerative thermal oxidizer.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued N-1646-37-1, emission increases, and application. Please submit your written comments on this project within the 45-day comment period that begins on the date you receive this letter.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Rupi Gill at (209) 557-6400.

Sincerely,

David Warner
Director of Permit Services

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TITLE V APPLICATION REVIEW

Minor Modification
Project #: N-1093771

Engineer: Kai Chan
Date: May 18, 2010

Facility Number: N-1646
Facility Name: Worldcolor (USA) LLC (Formerly Quebecor World)
Mailing Address: 2201 Cooper Avenue
Merced, CA 95348

Contact Name: Roger Ashlock
Phone: (209) 384-0444 ext. 288

Responsible Official: Roger Ashlock
Title: Environmental Coordinator

I. PROPOSAL

Worldcolor USA (LLC) is proposing a Title V minor permit modification to incorporate the recently issued Authority to Construct (ATC) permit N-1646-37-1 into their Title V operating permit. The facility is installing a new graphic arts printing operation consisting of an 8-Color heatset offset lithographic printing press (Press #522) with two natural gas fired drying ovens vented to a shared natural gas fired regenerative thermal oxidizer (RTO).

The purpose of this evaluation is to identify all applicable requirements, determine if the facility will comply with the applicable requirements and to provide the legal and factual basis for the proposed revisions.

II. FACILITY LOCATION

2201 Cooper Avenue
Merced, CA

III. EQUIPMENT DESCRIPTION

N-1646-37-2: GRAPHIC ARTS PRINTING OPERATION CONSISTING OF A MAN ROLAND MODEL ROTOMAN "S" 64" WIDE 8-COLOR HEATSET OFFSET LITHOGRAPHIC PRINTING PRESS (PRESS #522) WITH ONE 9.4 MMBTU/HR NATURAL GAS FIRED MEGTEC MODEL DDIII-135-2080 DRYING OVEN #1 (WITH MAXON LOW NOx BURNERS) AND ONE 9.0 MMBTU/HR NATURAL GAS FIRED MEGTEC MODEL DD III-135-2080 DRYING OVEN #2 (WITH MAXON LOW NOx BURNERS) EACH VENTED TO THE FACILITY SHARED 5.728 MMBTU/HRr MEGTEC CLEANSWITCH MODEL CS-250-95 NATURAL GAS FIRED REGENERATIVE THERMAL OXIDIZER.

IV. SCOPE OF EPA AND PUBLIC REVIEW

This change to a Title V permit is considered to be a minor modification and, as such, requires no public review.

V. APPLICABLE REQUIREMENTS

District Rule 2520, Federally Mandated Operating Permits (Adopted June 21, 2001)

VI. DESCRIPTION OF PROPOSED MODIFICATIONS

Worldcolor (USA) LLC is proposing to incorporate ATC permit N-1646-37-1 into the Title V PTO as N-1646-37-2 (Heatset Offset Lithographic Printing Press #522). This ATC permit was issued to install a new heatset offset lithographic printing press and vent the emissions from the printing press and associated drying ovens to the facility shared 5.728 MMBtu/hr Megtec Cleanswitch Model CS-300-95 natural gas fired regenerative thermal oxidizer. Originally ATC permit N-1646-37-0 was issued for this new printing press and associated drying ovens to be vented to the facility shared 9.5 MMBtu/hr Megtec Enterprise II or 18 MMBtu/hr Reeco Retherm Model E natural gas fired regenerative thermal oxidizers (RTOs). However, during the equipment start-up site inspection it was determined that the printing press and drying ovens were actually vented to the facility shared 5.728 MMBtu/hr Megtec Cleanswitch RTO. Therefore, ATC permit N-1646-37-0 could not be implemented and ATC permit N-1646-37-1 was issued for the modification. If applicable, the Compliance Assurance Monitoring (CAM) requirements of 40 CFR Part 64 will be addressed for this permit unit during the processing of the facility's Title V permit renewal project⁽¹⁾. A copy of the ATC permit N-1646-37-1 is included in Appendix B.

¹ Per District practice as referenced under FYI-89.

Proposed PTO N-1646-37-2:

1. Permit conditions 1., 2., 3., 32. and 33. on the ATC permit were deleted since they already appear on the facility-wide permit N-1646-0-1.
2. Permit condition 17. on the ATC permit was replaced with condition 14. on the proposed PTO. This condition was replaced to correctly state the requirements of District Rule 4607 (12/18/08 version), per Section 5.8.4.
3. Permit condition 18. on the ATC permit was replaced with condition 15. on the proposed PTO. This condition was replaced to correctly state the requirements of District Rule 4607 (12/18/08 version), per Section 5.8.5.
4. Permit condition 39. on the ATC permit was replaced with condition 34. on the proposed PTO. This condition was replaced since the required initial NOx and VOC emissions source test was performed by the facility on October 14, 2009.
5. Permit condition 60. on the ATC permit was deleted since this condition was satisfied when ATC permit N-1646-38-1 was deleted.
6. Permit condition 61. on the ATC permit was deleted since this condition was satisfied by the applicant's submittal of the application for this Title V permitting action.

VII. COMPLIANCE

In accordance with Rule 2520, 3.20, these modifications:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;
3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;

4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include;
 - a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
 - b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; and
5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
6. Do not seek to consolidate overlapping applicable requirements.

In accordance with Rule 2520, the application meets the procedural requirements of section 11.4 by including;

1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
2. The source's suggested draft permit; and
3. Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used.

Compliance is expected with this rule.

VIII. APPENDICES

- Appendix A:** Proposed Draft Title V Operating Permit N-1646-37-2
Appendix B: Authority to Construct Permit N-1646-37-1
Appendix C: Emissions Increases
Appendix D: Permit Application

APPENDIX A

**Proposed Modified Title V Operating Permit No.
N-1646-37-2**

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1646-37-2

EXPIRATION DATE: 09/30/2008

EQUIPMENT DESCRIPTION:

GRAPHIC ARTS PRINTING OPERATION CONSISTING OF ONE MAN ROLAND MODEL ROTOMAN S 64" WIDE 8-COLOR HEATSET OFFSET LITHOGRAPHIC PRINTING PRESS (PRESS #522) WITH ONE 9.4 MMBTU/HR NATURAL GAS MEGTEC MODEL DD III-135-2080 DRYING OVEN #1 AND ONE 9.0 MMBTU/HR NATURAL GAS FIRED MODEL DD III-135-2080 DRYING OVEN #2 EACH VENTED TO THE SHARED 5.728 MMBTU/HR MEGTEC CLEANSWITCH MODEL CS-300-95 NATURAL GAS FIRED REGENERATIVE THERMAL OXIDIZER.

PERMIT UNIT REQUIREMENTS

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
2. The drying ovens and regenerative thermal oxidizer shall be fired exclusively on natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
3. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of natural gas combusted in the drying ovens shall be installed, utilized and maintained. [District Rules 2201] Federally Enforceable Through Title V Permit
4. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of natural gas combusted in the regenerative thermal oxidizer shall be installed, utilized and maintained. [District Rules 2201] Federally Enforceable Through Title V Permit
5. The drying ovens serving the heatset offset printing press shall be maintained under negative pressure and shall be vented through the regenerative thermal oxidizer at all times except during periods of start-up while the dryers are being air purged. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102] Federally Enforceable Through Title V Permit
7. The collection system for the dryer exhausts and for all fugitive VOC emissions shall have a minimum capture efficiency of 90%. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The regenerative thermal oxidizer shall be operated with a minimum VOC destruction efficiency of 98%. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The regenerative thermal oxidizer shall be operated at a minimum temp. of 1400 deg. F. The incinerator shall be preheated to 1400 deg. F prior to the start-up of the heatset offset printing operation. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The regenerative thermal oxidizer shall be equipped with an operational continuous temperature monitoring and recording instrument. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The VOC content of the materials shall not exceed the following: inks less than 45% VOC by weight (less water and exempt compounds) and fountain solutions less than 15% by volume. [District Rule 2201] 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.

12. The VOC content of organic solvents used to perform surface preparation or cleanup shall not exceed the VOC content limits specified in Table 7 of Rule 4607 (Graphic Arts and Paper, Film, Foil, and Fabric Coatings - 12/18/08 version). [District Rule 4607] Federally Enforceable Through Title V Permit
13. For a permittee using any solvent containing more than 25 g/L (0.21 lb/gal) of VOC for organic solvent cleaning, cleaning activities shall be by one of the following methods: (1) wipe cleaning; or (2) application of solvent from hand-held spray 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 which 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 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. Solvents shall not be atomized into the open air unless it is vented to a VOC control device. This provision shall not apply to operations where roller or blanket wash is applied automatically and the cleaning of the nozzle tips of automated spray equipment systems, except for robotic systems, and cleaning with nonpropellant-induced, hand-held spray bottles or containers which solvents are dispensed without a propellant-induced force. [District Rule 4607] Federally Enforceable Through Title V Permit
15. The permittee shall not use VOC-containing material to clean spray equipment used for the application of coatings, adhesives, or ink, unless an enclosed system or equipment that is proven to be equally effective at controlling emissions is used for cleaning. If an enclosed system is used, it must totally enclose spray guns, cups, nozzles, bowls, and other parts during washing, rinsing, draining procedures, and it must be used according to manufacturer's recommendations and must be closed when not in use. [District Rule 4607] Federally Enforceable Through Title V Permit
16. Permittee shall store or dispose of fresh or spent solvents, waste solvent cleaning materials, coatings, adhesives, catalysts, thinners, and inks in closed, non-absorbent, non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4607] Federally Enforceable Through Title V Permit
17. The permittee shall properly use and 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
18. VOC emissions from the printing inks and solvents shall not exceed 50.0 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
19. NO_x emissions from the drying ovens shall not exceed 4.3 ppmvd @ 19% O₂ (referenced as NO₂) or 0.0492 lb-NO_x/MMBtu. [District Rules 2201 & 4309] Federally Enforceable Through Title V Permit
20. CO emissions from the drying ovens shall not exceed 25.0 ppmvd @ 19% O₂ or 0.174 lb-CO/MMBtu. [District Rules 2201 & 4309] Federally Enforceable Through Title V Permit
21. PM₁₀ emissions from the drying ovens shall not exceed 0.0076 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
22. SO_x emissions from the drying ovens shall not exceed 0.00285 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
23. VOC emission from the drying ovens shall not exceed 0.0055 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
24. NO_x emissions from the regenerative thermal oxidizer shall not exceed 4.3 ppmvd @ 19% O₂ (referenced as NO₂) or 0.0492 lb-NO_x/MMBtu. [District Rules 2201 & 4309] Federally Enforceable Through Title V Permit
25. CO emissions from the regenerative thermal oxidizer shall not exceed 25.0 ppmvd @ 19% O₂ or 0.174 lb-CO/MMBtu. [District Rules 2201 & 4309] 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.

26. PM10 emissions from the regenerative thermal oxidizer shall not exceed 0.01 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
27. SOx emissions from the regenerative thermal oxidizer shall not exceed 0.00285 lbs/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
28. VOC emissions from the regenerative thermal oxidizer shall not exceed 0.02 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
29. The total quantity of natural gas used in the drying ovens under this permit unit shall not exceed 137,000 cubic feet in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
30. The total quantity of natural gas used in the drying ovens under this permit unit shall not exceed 50.0 million cubic feet in any one calendar year. [District Rule 2201] Federally Enforceable Through Title V Permit
31. The total quantity of natural gas used in the regenerative thermal oxidizer shall not exceed 25,000 million cubic feet in any one calendar year. [District Rule 2201] Federally Enforceable Through Title V Permit
32. Source testing to demonstrate compliance with the VOC destruction efficiency of the regenerative thermal oxidizer shall be conducted on an annual basis. [District Rule 2201] Federally Enforceable Through Title V Permit
33. Source testing to determine the destruction efficiency of the regenerative thermal oxidizer shall be conducted using EPA Methods 2, 2A, or 2D for measuring flow rates and EPA Methods 25, 25A, or 25C for measuring total gaseous organic concentrations at the inlet and outlet of the control device. [District Rule 4607] Federally Enforceable Through Title V Permit
34. Source testing to measure NOx and CO emissions from the drying ovens shall be conducted at the exhaust of the associated regenerative thermal oxidizer at least once every 24 months. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit
35. All test results for NOx and CO shall be reported in ppmv @ 19% O2 (or no correction if measured above 19% O2), corrected to dry stack conditions. [District Rule 4309] Federally Enforceable Through Title V Permit
36. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis. [District Rule 4309] Federally Enforceable Through Title V Permit
37. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rule 4309] Federally Enforceable Through Title V Permit
38. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4309] Federally Enforceable Through Title V Permit
39. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4309. [District Rule 4309] Federally Enforceable Through Title V Permit
40. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rule 4309] Federally Enforceable Through Title V Permit
41. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
42. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] 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.

43. The permittee shall monitor and record the stack concentration of NO_x, CO, and O₂ at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rule 4309] Federally Enforceable Through Title V Permit
44. If either the NO_x or CO concentrations corrected to 19% O₂ (or no correction if measured above 19% O₂), as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rule 4309] Federally Enforceable Through Title V Permit
45. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4309] Federally Enforceable Through Title V Permit
46. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 19% O₂ (or no correction if measured above 19% O₂), (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rule 4309] Federally Enforceable Through Title V Permit
47. Permittee shall maintain a current file of coatings, inks, adhesives, fountain solutions, wash primers, and solvents in use and in storage. The file shall include material safety data sheet (MSDS) or product data sheet showing the material name, manufacturer's name, VOC content as applied, mixing instruction, and density. [District Rule 4607] Federally Enforceable Through Title V Permit
48. The permittee shall record on a daily basis, the type and amount of each coating, adhesive, fountain solution, wash primer, and solvent used. [District Rule 2201 & 4607] Federally Enforceable Through Title V Permit
49. The permittee shall record on a monthly basis, the type and amount of all inks used and their VOC content and densities, using one of the methods listed in Rule 4607, Section 6.1.2.1 (12/18/08 version of Rule 4607). [District Rule 4607] Federally Enforceable Through Title V Permit
50. The permittee shall record on a monthly basis, the type and amount of each ink, coating, adhesive, wash primer, and solvent used. [District Rule 4607] Federally Enforceable Through Title V Permit
51. The permittee 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
52. The permittee shall maintain daily records of the following: (1). Quantity of VOC emitted (in pounds) from this printing press; (2). Cumulative quantity of VOC emitted (in pounds) from all graphic arts printing operations at the facility; (3) Quantity of natural gas used (in cubic feet) by each drying oven and each thermal oxidizer at the facility; (4) Operational temperature of each thermal oxidizer. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
53. The permittee shall maintain a record of the cumulative annual quantity of natural gas used (in cubic feet) by the drying ovens under this permit. The cumulative total quantity of natural gas used shall be updated monthly. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
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54. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070 and 4309] Federally Enforceable Through Title V Permit

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

DRAFT

APPENDIX B

Authority to Construct Permit No.
N-1646-37-1



COPY

AUTHORITY TO CONSTRUCT

PERMIT NO: N-1646-37-1

ISSUANCE DATE: 08/06/2009

LEGAL OWNER OR OPERATOR: QUEBECOR WORLD
MAILING ADDRESS: 2201 COOPER AVE
MERCED, CA 95348

LOCATION: 2201 COOPER AVE
MERCED, CA

EQUIPMENT DESCRIPTION:

MODIFICATION OF THE GRAPHIC ARTS PRINTING OPERATION CONSISTING OF ONE MAN ROLAND MODEL ROTOMAN S 64" WIDE 8-COLOR HEATSET OFFSET LITHOGRAPHIC PRINTING PRESS (PRESS #522) WITH ONE 9.4 MMBTU/HR NATURAL GAS MEGTEC MODEL DD III-135-2080 DRYING OVEN #1 AND ONE 9.0 MMBTU/HR NATURAL GAS FIRED MODEL DD III-135-2080 DRYING OVEN #2 TO VENT THE OVEN TO THE SHARED 5.728 MMBTU/HR MEGTEC CLEANSWITCH MODEL CS-300-95 NATURAL GAS FIRED REGENERATIVE THERMAL OXIDIZER AND TO INCLUDE PERMIT CONDITIONS FOR RULE 4309 (DRYERS, DEHYDRATORS, & OVENS) COMPLIANCE.

CONDITIONS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann I or 20% opacity. [District Rule 4101]
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
4. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule]
5. The drying ovens and regenerative thermal oxidizer shall be fired exclusively on natural gas. [District Rule 2201]
6. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of natural gas combusted in the drying ovens shall be installed, utilized and maintained. [District Rules 2201]
7. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of natural gas combusted in the regenerative thermal oxidizer shall be installed, utilized and maintained. [District Rules 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 Sadreddin, Executive Director / APCO

DAVID WARNER, Director of Permit Services

N-1646-37-1: Aug 6 2009 7:54AM - CHANK : Joint Inspection NOT Required

Conditions for N-1648-37-1 (continued)

8. The drying ovens serving the heatset offset printing press shall be maintained under negative pressure and shall be vented through the regenerative thermal oxidizer at all times except during periods of start-up while the dryers are being air purged. [District Rule 2201]
9. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
10. The collection system for the dryer exhausts and for all fugitive VOC emissions shall have a minimum capture efficiency of 90%. [District Rule 2201]
11. The regenerative thermal oxidizer shall be operated with a minimum VOC destruction efficiency of 98%. [District Rule 2201]
12. The regenerative thermal oxidizer shall be operated at a minimum temp. of 1400 deg. F. The incinerator shall be preheated to 1400 deg. F prior to the start-up of the heatset offset printing operation. [District Rule 2201]
13. The regenerative thermal oxidizer shall be equipped with an operational continuous temperature monitoring and recording instrument. [District Rule 2201]
14. The VOC content of the materials shall not exceed the following: inks less than 45% VOC by weight (less water and exempt compounds) and fountain solutions less than 15% by volume. [District Rule 2201]
15. The VOC content of organic solvents used to perform surface preparation or cleanup shall not exceed the VOC content limits specified in Table 7 of Rule 4607 (Graphic Arts and Paper, Film, Foil, and Fabric Coatings - 12/18/08 version). [District Rule 4607]
16. For a permittee using any solvent containing more than 25 g/L (0.21 lb/gal) of VOC for organic solvent cleaning, cleaning activities shall be by one of the following methods: (1) wipe cleaning; or (2) application of solvent from hand-held spray 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 which 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 into the open air. The solvent may be flushed through the system by air or hydraulic pressure, or by pumping. [District Rule 4607]
17. For a permittee using any solvent containing more than 25 g/L (0.21 lb/gal) of VOC for organic solvent cleaning, solvent shall not be atomized into the open air unless it is vented to a VOC control device. This provision shall not apply to operations where roller or blanket wash is applied automatically and the cleaning of the nozzle tips of automated spray equipment systems, except for robotic systems, and cleaning with nonpropellant-induced, hand-held spray bottles or containers which solvents are dispensed without a propellant-induced force. [District Rule 4607]
18. For a permittee using any solvent containing more than 25 g/L (0.21 lb/gal) of VOC for organic solvent cleaning, the permittee shall not use VOC-containing material to clean spray equipment used for the application of coatings, adhesives, or ink, unless an enclosed system or equipment that is proven to be equally effective at controlling emissions is used for cleaning. If an enclosed system is used, it must totally enclose spray guns, cups, nozzles, bowls, and other parts during washing, rinsing, draining procedures, and it must be used according to manufacturer's recommendations and must be closed when not in use. [District Rule 4607]
19. Permittee shall store or dispose of fresh or spent solvents, waste solvent cleaning materials, coatings, adhesives, catalysts, thinners, and inks in closed, non-absorbent, non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4607]
20. The permittee shall properly use and operate all graphic arts printing technologies as directed and/or specified by the manufacturer of the printer or graphic arts material. [District Rule 4607]
21. VOC emissions from the printing inks and solvents shall not exceed 50.0 pounds in any one day. [District Rule 2201]
22. NOx emissions from the drying ovens shall not exceed 4.3 ppmvd @ 19% O2 (referenced as NO2) or 0.0492 lb-NOx/MMBtu. [District Rules 2201 & 4309]

CONDITIONS CONTINUE ON NEXT PAGE

23. CO emissions from the drying ovens shall not exceed 25.0 ppmvd @ 19% O₂ or 0.174 lb-CO/MMBtu. [District Rules 2201 & 4309]
24. PM₁₀ emissions from the drying ovens shall not exceed 0.0076 lb/MMBtu. [District Rule 2201]
25. SO_x emissions from the drying ovens shall not exceed 0.00285 lb/MMBtu. [District Rule 2201]
26. VOC emission from the drying ovens shall not exceed 0.0055 lb/MMBtu. [District Rule 2201]
27. NO_x emissions from the regenerative thermal oxidizer shall not exceed 4.3 ppmvd @ 19% O₂ (referenced as NO₂) or 0.0492 lb-NO_x/MMBtu. [District Rules 2201 & 4309]
28. CO emissions from the regenerative thermal oxidizer shall not exceed 25.0 ppmvd @ 19% O₂ or 0.174 lb-CO/MMBtu. [District Rules 2201 & 4309]
29. PM₁₀ emissions from the regenerative thermal oxidizer shall not exceed 0.01 lb/MMBtu. [District Rule 2201]
30. SO_x emissions from the regenerative thermal oxidizer shall not exceed 0.00285 lbs/MMBtu. [District Rule 2201]
31. VOC emissions from the regenerative thermal oxidizer shall not exceed 0.02 lb/MMBtu. [District Rule 2201]
32. Total VOC emissions from the stationary source (excluding permit unit N-1646-34) shall not exceed 235.6 pounds in any one day. [District Rule 2201]
33. Total NO_x emissions from the stationary source (excluding permit unit N-1646-34) shall not exceed 150 pounds in any one day. [District Rule 2201]
34. The total quantity of natural gas used in the drying ovens under this permit unit shall not exceed 137,000 cubic feet in any one day. [District Rule 2201]
35. The total quantity of natural gas used in the drying ovens under this permit unit shall not exceed 50.0 million cubic feet in any one calendar year. [District Rule 2201]
36. The total quantity of natural gas used in the regenerative thermal oxidizer shall not exceed 25,000 million cubic feet in any one calendar year. [District Rule 2201]
37. Source testing to demonstrate compliance with the VOC destruction efficiency of the regenerative thermal oxidizer shall be conducted on an annual basis. [District Rule 2201]
38. Source testing to determine the destruction efficiency of the regenerative thermal oxidizer shall be conducted using EPA Methods 2, 2A, or 2D for measuring flow rates and EPA Methods 25, 25A, or 25C for measuring total gaseous organic concentrations at the inlet and outlet of the control device. [District Rule 4607]
39. Source testing to measure NO_x and CO emissions from the drying ovens shall be conducted at the exhaust of the associated regenerative thermal oxidizer within 60 days of initial start-up and at least once every 24 months thereafter. [District Rules 2201 and 4309]
40. All test results for NO_x and CO shall be reported in ppmv @ 19% O₂ (or no correction if measured above 19% O₂), corrected to dry stack conditions. [District Rule 4309]
41. NO_x emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis. [District Rule 4309]
42. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rule 4309]
43. Stack gas oxygen (O₂) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4309]
44. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4309. [District Rule 4309]
45. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rule 4309]

CONDITIONS CONTINUE ON NEXT PAGE

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46. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081]
 47. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081]
 48. The permittee shall monitor and record the stack concentration of NO_x, CO, and O₂ at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rule 4309]
 49. If either the NO_x or CO concentrations corrected to 19% O₂ (or no correction if measured above 19% O₂), as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rule 4309]
 50. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4309]
 51. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 19% O₂ (or no correction if measured above 19% O₂), (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range [District Rule 4309]
 52. Permittee shall maintain a current file of coatings, inks, adhesives, fountain solutions, wash primers, and solvents in use and in storage. The file shall include material safety data sheet (MSDS) or product data sheet showing the material name, manufacturer's name, VOC content as applied, mixing instruction, and density. [District Rule 4607]
 53. The permittee shall record on a daily basis, the type and amount of each coating, adhesive, fountain solution, wash primer, and solvent used. [District Rule 2201 & 4607]
 54. The permittee shall record on a monthly basis, the type and amount of all inks used and their VOC content and densities, using one of the methods listed in Rule 4607, Section 6.1.2.1 (12/18/08 version of Rule 4607). [District Rule 4607]
 55. The permittee shall record on a monthly basis, the type and amount of each ink, coating, adhesive, wash primer, and solvent used. [District Rule 4607]
 56. The permittee shall record on a monthly basis, the type, amount and percent VOC by volume of each fountain solution used. [District Rule 4607]
 57. The permittee shall maintain daily records of the following: (1). Quantity of VOC emitted (in pounds) from this printing press; (2). Cumulative quantity of VOC emitted (in pounds) from all graphic arts printing operations at the facility; (3) Quantity of natural gas used (in cubic feet) by each drying oven and each thermal oxidizer at the facility; (4) Operational temperature of each thermal oxidizer. [District Rules 1070 and 2201]
 58. The permittee shall maintain a record of the cumulative annual quantity of natural gas used (in cubic feet) by the drying ovens under this permit. The cumulative total quantity of natural gas used shall be updated monthly. [District Rule 2201]

CONDITIONS CONTINUE ON NEXT PAGE

59. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4309, and 4309]
60. Authority to Construct permit N-1646-38-1 shall be cancelled prior to or at the same time as this Authority to Construct permit is implemented. [District Rules 2080]
61. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit

APPENDIX C

Emissions Increases

Permit Number	SSIPE (lb/yr)				
	NOx	VOC	CO	SOx	PM10
N-1646-37-2	0	0	8,700	143	380
TOTAL	0	0	8,700	143	380

APPENDIX D

Application

San Joaquin Valley Air Pollution Control District

www.valleyair.org

Permit Application For:

ADMINISTRATIVE AMENDMENT MINOR MODIFICATION SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: QUEBECOR WORLD INC.	
2. MAILING ADDRESS: STREET/P.O. BOX: <u>2201 COOPER AVENUE</u> CITY: <u>MERCED</u> STATE: <u>CALIF.</u> 9-DIGIT ZIP CODE: <u>95348-4307</u>	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: <u>2201 COOPER AVENUE</u> CITY: <u>MERCED</u> _____ ¼ SECTION _____ TOWNSHIP _____ RANGE _____	INSTALLATION DATE: September, 2006
4. GENERAL NATURE OF BUSINESS: Commercial printing	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) TO INCLUDE ATC PERMIT NO. N-1646-37-1 INTO QUEBECOR WORLD TITLE -V PERMIT.	
6. TYPE OR PRINT NAME OF APPLICANT: ROGER ASHLOCK	TITLE OF APPLICANT: ENVIRONMENTAL COORDINATOR
7. SIGNATURE OF APPLICANT: <i>Roger A. Ashlock</i>	DATE: <u>8-6-2009</u> PHONE: (209) 384-0444 FAX: (209) 384-2680 EMAIL: roger.ashlock@quebecorworld.com

For APCD Use Only:

DATE STAMP RECEIVED AUG 07 2009 SJVAPCD NORTHERN REGION	FILING FEE RECEIVED: \$ <u>0</u> CHECK#: <u>N/A</u>
	DATE PAID: <u>N/A</u> PROJECT NO: <u>N1093771</u> FACILITY ID: <u>N11646</u>

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

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

- SIGNIFICANT PERMIT MODIFICATION ADMINISTRATIVE
 MINOR PERMIT MODIFICATION AMENDMENT

COMPANY NAME: QUEBECOR WORLD INC.	FACILITY ID: N-1646
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: QUEBECOR WORLD INC.	
3. Agent to the Owner: ROGER ASHLOCK	

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:

Roger A. Ashlock

Signature of Responsible Official

8-6-2009

Date

ROGER ASHLOCK

Name of Responsible Official (please print)

ENVIRONMENTAL COORDINATOR

Title of Responsible Official (please print)