



JUN 24 2013

Gerardo C. Rios, Chief
Permits Office (AIR-3)
U.S. EPA - Region IX
75 Hawthorne St
San Francisco, CA 94105

**Re: Notice of Final Action - Minor Title V Permit Modification
District Facility # N-1646
Project # N-1103547**

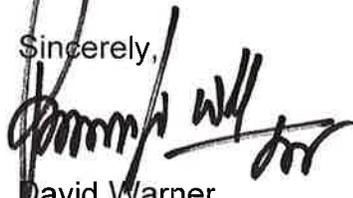
Dear Mr. Rios:

The Air Pollution Control Officer has modified the Title V permit for QG, LLC by incorporating N-1646-39-4. Include the existing World Wide Graphics Model WWG DAF-1500 aqueous coater and associated radiant curing unit in the equipment description, and utilize UV coatings and install a Prime UV 6-lamp curing system.

Enclosed is the modified Title V permit. The application and proposal were sent to US EPA Region IX on May 2, 2013. No comments were received following the District's preliminary decision on this project.

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

Sincerely,



David Warner
Director of Permit Services

DW:kc

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
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Southern Region
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San Joaquin Valley
Air Pollution Control District

COPY

PERMIT UNIT: N-1646-39-6

EXPIRATION DATE: 09/30/2013

EQUIPMENT DESCRIPTION:

GRAPHIC ARTS PRINTING OPERATION CONSISTING OF ONE MAN ROLAND MODEL ROTOMAN N 38" WIDE 5-COLOR HEATSET OFFSET LITHOGRAPHIC PRINTING PRESS (PRESS #524) WITH ONE 4.587 MMBTU/HR NATURAL GAS FIRED THERMO WISCONSIN MODEL APOLLO A3100 DRYING OVEN SERVED BY THE SHARED 5.728 MMBTU/HR MEGTEC CLEANSWITCH MODEL CS-300-95 NATURAL GAS FIRED REGENERATIVE THERMAL OXIDIZER, AND ONE WORLD WIDE GRAPHICS MODEL WWG DAF-1500 AQUEOUS/UV COATER WITH A RADIANT CURING UNIT AND PRIME UV 6-LAMP CURING SYSTEM.

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 Rule 2201] Federally Enforceable Through Title V Permit
2. The drying oven and 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 oven shall be installed, utilized and maintained. [District Rule 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 thermal oxidizer shall be installed, utilized and maintained. [District Rule 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 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, 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 thermal oxidizer shall be operated with a minimum VOC destruction efficiency of 98%. [District Rule 2201] Federally Enforceable Through Title V Permit
9. 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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

10. 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
11. 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] Federally Enforceable Through Title V Permit
12. 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] Federally Enforceable Through Title V Permit
13. The 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
14. 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
15. 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
16. The VOC content of aqueous and UV coatings shall not exceed 2.2 lb/gal (265 g/l) (less water and exempt compounds) and the VOC content of the aqueous and UV wash primers shall not exceed 2.2 lb/gal (265 g/l). [District Rule 4607]
17. VOC emissions from the printing inks, coatings, fountain solutions, wash primers, and solvents shall not exceed 27.5 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
18. NO_x emissions from the drying oven shall not exceed 4.3 ppmvd @ 19% O₂ (referenced as NO₂). [District Rule 2201] Federally Enforceable Through Title V Permit
19. CO emissions from the drying oven shall not exceed 25.0 ppmvd @ 19% O₂. [District Rule 2201] Federally Enforceable Through Title V Permit
20. Emissions from the drying oven shall not exceed any of the following limits: 0.00285 lb-SO_x/MMBtu, 0.01 lb-PM₁₀/MMBtu, or 0.02 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
21. NO_x emissions from the regenerative thermal oxidizer shall not exceed 4.3 ppmvd @ 19% O₂ (referenced as NO₂). [District Rule 2201] Federally Enforceable Through Title V Permit
22. CO emissions from the regenerative thermal oxidizer shall not exceed 25.0 ppmvd @ 19% O₂. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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23. Emissions from the regenerative thermal oxidizer shall not exceed any of the following limits: 0.00285 lb-SO_x/MMBtu, 0.01 lb-PM₁₀/MMBtu, or 0.02 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
24. The total quantity of natural gas used in the drying oven under this permit unit shall not exceed 11.651 million cubic feet in any one calendar year. [District NSR Rule] Federally Enforceable Through Title V Permit
25. The total quantity of natural gas used in the thermal oxidizer shall not exceed 25.0 million cubic feet in any one calendar year. [District NSR Rule] Federally Enforceable Through Title V Permit
26. Source testing to demonstrate compliance with the VOC destruction efficiency of each regenerative thermal oxidizer shall be conducted on an annual basis. [District Rule 2201] Federally Enforceable Through Title V Permit
27. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
28. 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
29. Source testing to determine the destruction efficiency of each 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
30. The 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
31. 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 4607] Federally Enforceable Through Title V Permit
32. 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
33. 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
34. 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
35. 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 the regenerative thermal oxidizer. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
36. The permittee shall maintain a record of the cumulative annual quantity of natural gas used (in cubic feet) by the drying oven and thermal oxidizer under this permit. The cumulative total quantity of natural gas used shall be updated monthly. [District Rule 2201] Federally Enforceable Through Title V Permit
37. All records shall be maintained and retained on-site for a minimum of five years, and shall be made available for District inspection upon request. [District Rules 1070, 2520, and 4607] Federally Enforceable Through Title V Permit
38. The regenerative thermal oxidizer shall be operated at a minimum temp. of 1400 deg. F. The regenerative thermal oxidizer shall be preheated to 1400 deg. F prior to the start-up of the heatset offset printing operation. [District Rules 2201 and 2520 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
39. The regenerative thermal oxidizer shall be equipped with a continuous temperature monitoring and recording instrument. [District Rules 2201 and 2520 and 40 CFR Part 64] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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40. The regenerative thermal oxidizer shall be operated at a minimum temp. of 1400 deg. F. Upon determining an excursion from this requirement, the permittee shall investigate the excursion and take corrective action to minimize emissions and prevent recurrence of the excursion as expeditiously as practicable. [District Rule 2520 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
41. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR part 64.7. [40 CFR part 64] Federally Enforceable Through Title V Permit
42. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR part 64.9. [40 CFR part 64] Federally Enforceable Through Title V Permit
43. If the District or EPA determine that a Quality improvement plan is required under 40 CFR part 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64.8. [40 CFR Part 64] Federally Enforceable Through Title V Permit

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

Engineer Name	Kai Chan
Engineer Initials	kc
Engineer's Regional Manager	Rupi Gill
Facility Name	QG, LLC
Facility #	N-1646
ATC#'s being incorporated (ex. Authorities to Construct C-1234-1-2 and '-2-3)	N-1646-39-4
Preliminary Notice Date	May 2, 2013
Project #	N-1103547
Modification (complete sentences with period)	Include the existing World Wide Graphics Model WWG DAF-1500 aqueous coater and associated radiant curing unit in the equipment description, and utilize UV coatings and install a Prime UV 6-lamp curing system.
Contact Receiving Final	Mr. Michael Hauptman
Mailing Address	2201 Cooper Avenue Merced, CA 95348
Did EPA have comments/objections?	No
Prorate?	0