

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

IN THE MATTER OF:)
)
Arandell Corporation) NOTICE OF VIOLATION
Menomonee Falls, Wisconsin)
) EPA-5-00-WI-7
)
Proceedings Pursuant to)
Section 113(a)(1) of the)
Clean Air Act, 42 U.S.C.)
§ 7413(a)(1))

NOTICE OF VIOLATION

The Administrator of the United States Environmental Protection Agency (U.S. EPA), is issuing this Notice of Violation under Section 113(a)(1) of the Clean Air Act, 42 U.S.C. § 7413(a)(1). U.S. EPA finds that Arandell is violating the Wisconsin State Implementation Plan (SIP), as follows:

Statutory and Regulatory Background

1. On April 9, 1996, U.S. EPA approved Wisconsin Rule NR 422.142 as part of the federally enforceable SIP for the State of Wisconsin, effective June 10, 1996. 61 Fed. Reg. 15706.
2. Wisconsin Rule NR 422.142(5)(b)2 states "any facility with allowable VOC emissions from lithographic printing presses of less than 100 tons per year shall perform an emission test which demonstrates compliance with sub.(2)(a) every 48 months. Each test shall be performed within 90 days of the anniversary date of the initial emission test."
3. Wisconsin Rule NR 422.142(6)(b)1 states "the owner or operator of a lithographic printing press which is installed on or before July 1, 1996, shall submit to the department no later than September 1, 1996 written certification that the press is in compliance with the applicable requirements of subs.(2) and (3) and shall provide a demonstration of compliance in accordance with subs.(4) and (5)." Rule NR 422.142(6)(b)1 further states that a compliance emission test performed no more than 2 years prior to the compliance deadline may be an acceptable demonstration of compliance in accordance with NR 422.142(5).

4. 40 C.F.R. § 52.23 states in part that failure to comply with any approved regulatory provision of a State implementation plan, or any permit condition issued pursuant to approved or promulgated regulations for the review of new or modified stationary or indirect sources, shall render the person so failing to comply in violation of the applicable implementation plan and subject to enforcement action under Section 113 of the Clean Air Act.

Factual Background

5. Arandell owns and operates six heatset web offset lithographic printing presses, designated as Presses #451, #455, #456, #457, #458, and #459, located at N82 W13118 Leon Road, Menomonee Falls, Wisconsin, which were installed before July 1, 1996.
6. On November 15, 1995, the Wisconsin Department of Natural Resources (WDNR) issued permit number 95-DAA-276 to Arandell. This permit authorizes construction and initial operation of presses 451, 456, 457 and 458. On January 20, 1998, WDNR issued permit number 97-DAA-297 to Arandell. This permit authorizes construction and initial operation of press 455.
7. Emissions from the heatset web offset lithographic printing presses are subject to the organic compound emissions limitations, testing and certification requirements for lithographic printing operations as set forth in the Wisconsin SIP at Wisconsin Rule NR 422.142.
8. Emissions from the heatset web offset lithographic printing presses are subject to limitations as set forth in their WDNR construction and operation permits.

Findings of Violation

9. Arandell did not demonstrate compliance with dryer exhaust emission limitations by performing compliance emission tests on the control devices on Presses #451 and #456, no more than 2 years prior to the compliance deadline of July 1, 1996, as required by NR 422.142(5)(b)2.
10. Arandell did not submit a certification that Presses #451 and #456 were in compliance with the applicable requirements of NR 422.142 subs. (2) and (3) to WDNR on or before September 1, 1996, nor did it provide a demonstration of compliance in accordance with subs.(4) and (5), as required

by NR 422.142(6)(b)1.

11. Arandell is in violation of certain permit conditions issued pursuant to approved or promulgated regulations for the review of new or modified stationary of indirect sources, and is therefore subject to enforcement action under Section 113 of the Clean Air Act as provided by 40 C.F.R. § 52.23. Arandell failed to comply with Specific Condition #4, (Permit 95-DAA-276-OP), which limits monthly VOC usage for automatic blanket wash processes to 2,315 pounds VOC per month (combined usage for Presses #451, 456, 457 and 458; twelve month rolling average), for the months in 1998 and 1999 listed below.
12. Arandell also failed to comply with Specific Condition #7, (Permit 97-DAA-297), which limits fountain solution VOC usage (Press #455) to 102 pounds VOC per month (twelve month rolling average) for the months in 1998 and 1999 listed below.

Monthly Usage (Auto Blanket Wash)

<u>Month and Year</u>	<u>Usage (lbsVOC/month)</u>
January 1998	2457
February 1998	2389
March 1998	2433
April 1998	2440
May 1998	2377
June 1998	2452
July 1998	2491
August 1998	2495
September 1998	2639
October 1998	2663
November 1998	2773
December 1998	2894
January 1999	2704
February 1999	2521
March 1999	2507
April 1999	2475
May 1999	2462
June 1999	2380
July 1999	2376

Monthly Usage (Fountain Solution)

<u>Month and Year</u>	<u>Usage (lbsVOC/month)</u>
February 1998	107
April 1998	121
June 1998	104
July 1998	120
August 1998	126
September 1998	130
October 1998	130
November 1998	126
December 1998	128
January 1999	124
February 1999	122
March 1999	122
April 1999	115
May 1999	125

3-06-00

Date



Bharat Mathur, Director
Air and Radiation Division

CERTIFICATE OF MAILING

I, Shanee Rucker, certify that I sent a Notice of Violation, issued pursuant to the Clean Air Act, by Certified Mail, Return Receipt Requested, to:

F. Edward Treis, Chairman of the Board
Arandell Corporation
P.O. Box 405
Menomonee Falls, Wisconsin 53052-0405

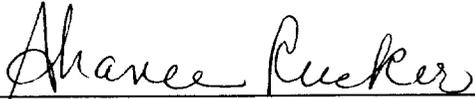
I also certify that I sent copies of the Notice of Violation by first class mail to:

David Treis, Operations Manager
Arandell Corporation
P.O. Box 405
Menomonee Falls, Wisconsin 53052-0405

Llyod Eagan, Director
Wisconsin Department of Natural Resources
Bureau of Air Management
101 S. Webster Street
P.O. Box 7921
Madison, Wisconsin 53707

Lakshmi Sridharan, Regional Air Leader
Wisconsin Department of Natural Resources
Southeast Region
2300 North Dr. Martin Luther King Jr. Drive
P.O. Box 12436
Milwaukee, Wisconsin 53212

on the 6th day of March, 2000.



Shanee Rucker, Secretary
AECAS, MI/WI

CERTIFIED MAIL RECEIPT NUMBER: 2199 026485