



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF

MAY 04 2005

(AE-17J)

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Scott D. Gray
Quebecor World St. Cloud, Inc.
660 Mayhew Lake Road N.E.
P.O. Box 1007
St. Cloud, MN 56304

Re: Finding of Violation, 40 C.F.R. Part 82, Subpart F

Dear Mr. Gray:

The United States Environmental Protection Agency (EPA) is issuing the enclosed Finding of Violation (FOV) to Quebecor World St. Cloud, Inc. (Quebecor). We find that you are violating Section 608 of the Clean Air Act, Protection of Stratospheric Ozone Standards, 42 U.S.C. § 7471g.

We have several enforcement options under Section 113(a)(3) of the Clean Air Act, 42 U.S.C. § 7413(a)(3). These options include issuing an administrative compliance order, issuing an administrative penalty order, and bringing a judicial, civil, or criminal action. The options we select may depend on, among other things, the length of time you take to achieve and demonstrate continuous compliance with the rules cited in the FOV.

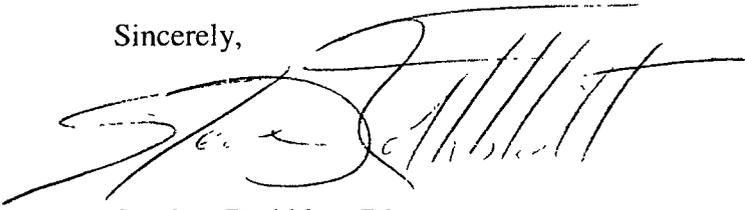
We are offering you an opportunity to confer with us about the violations alleged in the FOV. The conference will give you the opportunity to present information on the specific findings of violation, the efforts you have taken to comply, and the steps you will take to prevent future violations.

Please plan for your company's technical and management personnel to attend the conference to discuss compliance measures and commitments. You may have an attorney represent you at this conference.

The contacts in this matter are Sheila Desai, Environmental Engineer, and Kathleen Schnieders, Associate Regional Counsel. You may call them at (312) 353-4150 and (312) 353-8912 respectively to request a conference. You should make the request as soon as possible, but no

later than 10 calendar days after you receive this letter. We should hold any conference within 30 calendar days of your receipt of this letter.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen Rothblatt". The signature is stylized with a large, sweeping initial "S" and a long horizontal line extending to the right.

Stephen Rothblatt, Director
Air and Radiation Division

Enclosure

cc: Ann Foss, MPCA
Kathleen Schnieders, U.S. EPA

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

IN THE MATTER OF:

Quebecor World St. Cloud, Inc.
St. Cloud, Minnesota

Proceedings Pursuant to
the Clean Air Act,
42 U.S.C. §§ 7401 *et seq.*

FINDING OF VIOLATION

EPA-5-05-MN-10

FINDING OF VIOLATION

The United States Environmental Protection Agency finds that Quebecor World St. Cloud, Inc. (Quebecor) has violated Section 608 of the Clean Air Act (Act), 42 U.S.C. § 7471g. Specifically, Quebecor has violated the Protection of Stratospheric Ozone Standards at 40 C.F.R. Part 82, Subpart F, Recycling and Emissions Reduction, as follows:

Regulatory Authority

1. Section 608 of the Act, 42 U.S.C. § 7471g, requires the Administrator of EPA to promulgate regulations establishing standards and requirements regarding the use and disposal of "Class I" and "Class II" ozone-depleting substances.
2. On May 14, 1993, in accordance with Section 608 of the Act, EPA promulgated regulations at 40 C.F.R. Part 82, Subpart F, applicable to Recycling and Emissions Reduction (the Subpart F regulations).
3. The Subpart F regulations apply to any person servicing, maintaining, repairing, or owning appliances, as those terms are defined at 40 C.F.R. § 82.152. 40 C.F.R. § 82.150(b).
4. The Subpart F regulations, at 40 C.F.R. § 82.156(i)(2), require that an owner or operator of industrial process refrigeration equipment and normally containing more than 50 pounds of refrigerant must have leaks repaired if the appliance is leaking at a rate such that the loss of refrigerant will exceed 35 percent of the total charge during a 12-month period. Repairs must bring annual leak rates to below 35 percent during a twelve month period.
5. The Subpart F regulations, at 40 C.F.R. § 82.156(i)(9), require that owners or operators of industrial process refrigeration equipment must repair leaks pursuant to 40 C.F.R. § 82.156(i)(2) within 30 days after discovery of the leak.

6. The Subpart F regulations, at 40 C.F.R. § 82.156(i)(3), require that an owner or operator of industrial process refrigeration equipment conduct an initial verification test at the conclusion of the repair efforts.
7. The Subpart F regulations, at 40 C.F.R. § 82.156(i)(3), require that an owner or operator of industrial process refrigeration equipment conduct a follow-up verification test within 30 days after the initial verification test.
8. The Subpart F regulations, at 40 C.F.R. § 82.156(i)(6), state that an owner or operator of industrial process refrigeration equipment must develop a one-year retrofit and retirement plan within 30 days of discovering the exceedance of the applicable leak rate or within 30 days of a failed follow-up verification test. The plan must be dated and kept at the site of the appliance.
9. The Subpart F regulations, at 40 C.F.R. § 82.156(i)(3)(ii), require that an owner or operator of industrial process refrigeration equipment must retrofit or retire such equipment within one year of failing the follow-up verification test.
10. The Subpart F regulations, at 40 C.F.R. § 82.156(i)(3)(iii), require that an owner or operator of industrial process refrigeration equipment that fails a follow-up verification test must notify U.S. EPA within 30 days of the failed follow-up verification test.
11. The Subpart F regulations, at 40 C.F.R. § 82.166(k), require owners of refrigeration equipment normally containing more than 50 pounds of refrigerant to keep service records documenting the date and type of service, as well as the quantity of refrigerant added.

Finding of Facts

12. Quebecor owns and operates a lithographic printing facility in St. Cloud, Minnesota. This facility contains ten industrial process refrigeration units with normal charges of over 50 pounds, including the following units:
 - A. Rack A System 1
 - B. Rack A System 2
 - C. Rack B System 1
 - D. Rack C System 1
 - E. Rack C System 2

The refrigeration units referenced above are “appliances”, as defined in 40 C.F.R. §82.152, and use the class II refrigerant R-22.

13. Between November 1, 2001 and December 29, 2004, industrial process refrigeration unit Rack A System 1 experienced leaks that resulted in an annual leak rate exceeding 35 percent.

14. Quebecor did not perform repairs on Rack A System 1 that resulted in returning the annual leak rate to below 35 percent on the following dates:
 - A. April 17, 2004
 - B. June 28, 2004
 - C. August 31, 2004
15. Quebecor failed to perform initial verification tests to verify that the repairs performed on April 17, 2004 had brought the leak rate of Rack A System 1 to below 35 percent.
16. Quebecor failed to perform follow up verification tests to verify that the repairs performed on the following dates had brought the leak rate of Rack A System 1 to below 35 percent:
 - A. April 17, 2004
 - B. June 28, 2004
 - C. August 31, 2004
17. Quebecor did not develop retrofit or retirement plans for Rack A System 1 when repairs performed on the following dates were unable to bring the leak rate to below 35 percent:
 - A. April 17, 2004
 - B. June 28, 2004
 - C. August 31, 2004
18. Quebecor did not notify the EPA after repairs on Rack A System 1 on the following dates failed to bring the leak rates to below 35 percent:
 - A. April 17, 2004
 - B. June 28, 2004
 - C. August 31, 2004
19. Quebecor did not record the quantity of refrigerant added to the following industrial process refrigeration units on the following dates:
 - A. Rack B System 1 on January 19, 2003
 - B. Rack C System 1 and Rack C System 2 on January 23, 2003
 - C. Rack A System 1 and Rack A System 2 on January 26, 2004

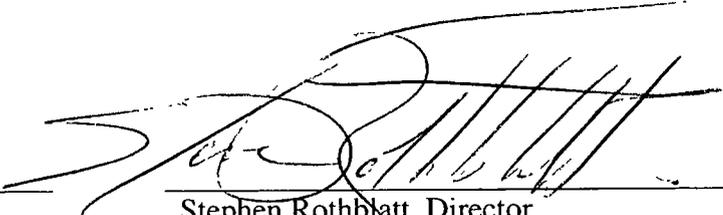
Violations

21. Quebecor is in violation of 40 C.F.R. § 82.156(i)(2) and Section 608 of the Act, 42 U.S.C. § 7471g, for failing to repair leaking industrial process refrigeration equipment such that the annual leak rate is brought below 35 percent.

22. Quebecor is in violation of 40 C.F.R. § 82.156(i)(3) and Section 608 of the Act, 42 U.S.C. § 7471g, for failing to properly conduct initial verification tests.
23. Quebecor is in violation of 40 C.F.R. § 82.156(i)(3) and Section 608 of the Act, 42 U.S.C. § 7471g, for failing to properly conduct follow-up verification tests.
24. Quebecor is in violation of 40 C.F.R. § 82.156(i)(6) and Section 608 of the Act, 42 U.S.C. § 7471g, for failing to develop a one-year retrofit and retirement plan for leaking refrigeration equipment following an exceedance of the applicable leak rate or a failed follow-up verification test.
25. Quebecor is in violation of 40 C.F.R. § 82.156(i)(3)(iii) and Section 608 of the Act, 42 U.S.C. § 7471g, for failing to notify the U.S. EPA of failed follow-up verification tests.
26. Quebecor is in violation of 40 C.F.R. § 82.166(k) and Section 608 of the Act, 42 U.S.C. § 7471g, for failing to keep service records documenting the date and type of service, as well as the quantity of refrigerant added.

Date

5/4/2005



Stephen Rothblatt, Director
Air and Radiation Division

CERTIFICATE OF MAILING

I, Loretta Shaffer, certify that I sent a Finding of Violation, No. EPA-5-05-MN

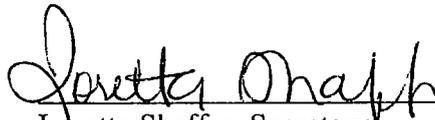
by Certified Mail, Return Receipt Requested, to:

Scott D. Gray
Quebecor World St. Cloud, Inc.
660 Mayhew Lake Road N.E.
P.O. Box 1007
St. Cloud, MN 56304

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

Ann Foss, Enforcement
Minnesota Pollution Control Agency
520 LaFayette Road North
St. Paul, Minnesota 55155

on the 9th day of May, 2005.



Loretta Shaffer, Secretary
AECAS (MN/OH)

CERTIFIED MAIL RECEIPT NUMBER: 7001 0320 0005 8909 8060