

<b>SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT</b>  <b>STATIONARY SOURCE AND COMPLIANCE DIVISION</b> Large Coating, Printing and Chemical Operations Team <b>APPLICATION PROCESSING AND CALCULATIONS</b>	PAGE	1 of 11
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**PERMIT TO OPERATE EVALUATION  
(LITHOGRAPHIC PRINTING PRESSES)**

<b>Applicant's Name</b>	CENVEO ANDERSON LITHOGRAPHIC CO.
<b>Company I.D.</b>	37601
<b>Mailing Address</b>	3217 S. GARFIELD AVE., LOS ANGELES, CA 90040
<b>Equipment Address</b>	3217 S. GARFIELD AVE, LOS ANGELES, CA 90040

**EQUIPMENT DESCRIPTION**

**Application No. 480044 (New Construction, Replacement for A/N 448144) (System 22),**

LITHOGRAPHIC PRINTING LINE NO. HXL-3 CONSISTING OF:

- 1) PRINTING PRESS, HEIDELBERG, MODEL # XL105-8+X3-UV, EIGHT COLORS, AQUEOUS COATER, 40 INCH WIDE SHEET FED, WITH A TECHNOTRANS BETA C.350 ROLL CHILLER.
- 2) UV CURING, TECHNOTRANS, ELEVEN LAMPS, EACH 16 KW.
- 3) INFRARED DRYER, 125 KW TOTAL.

**Application No. 480045 (New Construction, Replacement for A/N 448142) (System 23)**

LITHOGRAPHIC PRINTING LINE NO. HXL-4 CONSISTING OF:

- 1) PRINTING PRESS, HEIDELBERG, MODEL # XL105-8+X3, EIGHT COLORS, AQUEOUS COATER, 40 INCH WIDE SHEET FED, WITH A TECHNOTRANS BETA C.350 ROLL CHILLER.
- 3) INFRARED DRYER, 125 KW TOTAL.

**Application NO. 480043**

Title V Permit Revision Application

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<b>HISTORY</b>
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Cenveo Anderson Lithographic Co. submitted the above permit applications to install two new sheet-fed, IR dry, lithographic printing presses, which will replace two currently permitted (application nos. 448142 and 448144) sheet-fed, IR dry, lithographic printing press lines.

This facility has a number of active permits from the District to operate different equipment, such as lithographic printing presses, afterburner, turbine engine, boilers, etc. The applicant has both heat set lithographic web printing lines and IR-dry lithographic printing lines.

The applicant informed the District that these presses will replace two old similar presses with following details under this project.

Press Description	New A/N	Permit Shield A/N	Permit # With shield	Title V Device #s	Previous A/N	Previous Permit #	ROG Permit Limit (lb/day)
Komori L840 replaced By Heidelberg CD105-8	480044	448144	F83770	18, 19, 20, 21	333063	F15723	274
Komori L640 replaced By Heidelberg CD105-8	480045	448142	F83769	15, 16, 17	333059	F15722	176

The current permit conditions for the Komori printing presses allowed VOC emissions limits of 274 and 176 pounds per day, with a facility VOC emission cap of 16,590 pounds per calendar month (553 lb/day). The company did not request any equipment VOC emission increase or facility-wide VOC emission increase from this project.

The company has a Permanent Total Enclosure (PTE) on all the air-dry printing presses, such that all the VOC emissions are reduced 92% by the turbine engine (A/N # 333080). The company has in the past source tested this control device. The source test results were submitted by the company and approved by the district source testing department. However, the company has requested not to consider any fugitive emission reduction by the turbine engine for these application reviews, as they need to shut down the turbine engine for different reasons during the year and they do not want to shut down the printing operations during the period of non-operation of the turbine.

The district data did not show any notices of violation issued against this facility. Also, there were no records of any complaints for visible emissions or odor nuisance in the district database. The facility is located within an industrial area. It is not located within 1000 feet from any school and there will not be any emission increases under this replacement project, hence, these applications will not require a public notification per Rule 212.

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Cenveo Anderson Lithograph Co. is a Title V facility. A Title V renewal permit was issued to this facility in July 2005. The proposed permit revision is considered a “minor permit revision” to the Title V permit, as described in Regulation XXX evaluation.

**PROCESS DESCRIPTION**

Anderson Lithographic Co. is a large sized Lithographic offset printing facility where books, catalogs, brochures, advertisements, etc. are printed on the coated and uncoated papers. The printing is performed in a number printing units and both sides of the paper. The stations are equipped with automatic blanket wash units.

The printed papers are fed to an IR electric powered ovens to dry the inks. The printed paper is then passes through UV coating units and curing units. The final coating is applied on a silicone coater, where an aqueous silicone emulsion solution is applied to provide the slip of the sheets.

**OPERATING HOURS**

Average: 24 hr/day, 7 day/week, 52 weeks/year  
Maximum: 24 hr/day, 7 day/week, 52 weeks/year

**EMISSION CALCULATIONS**

Emissions from this facility are mostly VOC and combustion gases.. The VOC emission sources are primarily organic solvents contained in inks, fountain solutions and washes (washes of blanket, roller, tray and related equipment). The company plans to use conventional and UV-curable printing inks and aqueous and UV-curable coatings on these presses.

Only 5% of the solvent contained in the ink and varnish is emitted in the drying process. It was assumed that all of the solvents in the fountain solution and washes are released to the atmosphere. As such, an emission factor of 1 is used in the calculation. The presses will be vented to the turbine unit most of the time for VOC emission reduction. So the following table gives calculations for the VOC emissions with 92% of control efficiency by the turbine unit.

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Lithographic Press								
480044, 480045	<u>maximum</u>	<u>normal</u>				<u>ink/varnish</u>	<u>fountain</u>	<u>wash</u>
<u>hr/dy</u>	24	24		<u>Emission factor</u>	5%	100%	100%	
<u>dy/wk</u>	7	7						
<u>wk/yr</u>	52	52		<u>Control efficiency</u>	92%			
	<u>VOC</u>	<u>ave</u>	<u>max</u>		<u>ave VOC</u>	<u>max VOC</u>		
	(lb/gal)	(gal/dy)	(gal/dy)		(lb/dy)	(lb/dy)		
<u>ink #1</u>	1.55	2	20		0.01	0.12		
<u>ink #2</u>	1.55	2	20		0.01	0.12		
<u>ink #3</u>	1.68	2	20		0.01	0.13		
<u>ink #4</u>	2.26	2	20		0.02	0.18		
<u>PMS colors</u>	1.25	4	30		0.02	0.15		
<u>Inks &amp; Coating</u>	0.05	30	65		1.50	3.25		
<u>Dull Varnish</u>	0.509	100	200		0.20	0.41		
<u>Gloss Varnish</u>	1.54	100	200		0.62	1.23		
<u>aceous. Coating</u>	1.54	100	200		12.32	24.64		
<u>IPA</u>	6.6	10	25		5.28	13.20		
<u>etch</u>	2.9	25	100		5.80	23.20		
<u>blanket wash</u>	0.8	25	100		1.60	6.40		
<u>240 rollerwash</u>	0.004	25	100		0.01	0.03		
<u>ering roll. Wa</u>	0.75	50	200		3.00	12.00		
	<u>NSR---&gt;&gt;&gt;</u>	<u>max</u>	<u>max</u>	<u>30-day</u>		<u>AEIS---&gt;&gt;&gt;</u>	<u>ave</u>	<u>ave</u>
		(lb/hr)	(lb/dy)	(lb/dy)			(lb/hr)	(lb/yr)
<u>ROG (R1)</u>		66.03	1584.75	NA			23.98	NA
<u>ROG (R2)</u>		3.54	85.07	85.07			1.27	11067.03

The company had in the past submitted a list if toxic materials (see following table) used in their facility per press, including presses with A/N 448141 and 448144 being replaced.

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<i>Material</i>	<i>Annual Usage In Lbs.</i>	<i>Wt. Conc. (Lb/Lb)</i>	<i>Toxic Emissions (lbs/yr)</i>	<i>Toxic Emissions (lbs/hr)</i>	<i>Tier 1 Emission levels at 100 meter receptor</i>
<b>Vinyl Acetate (CAS # 108-05-4)</b>					
Blair Glue R28AL	4170	0.01	41.7	0.00476	51700 lbs/yr
<b>Formaldehyde (CAS # 50-00-0)</b>					
Blair Glue R28AL	4170	0.001	4.17		
Star # 25	19020	0.001	19.02		
Total			23.19	0.00265	0.252 lbs/hr 42.5 lbs/yr
<b>Acetaldehyde (CAS # 75-07-0)</b>					
Blair Glue R28AL	4170	0.001	4.17		
Star # 25	19020	0.001	19.02		
			23.19	0.00265	89.2 lbs/yr
<b>Benzene (CAS # 71-43-2)</b>					
Star # 25	19020	0.001	19.02	0.00217	3.96 lbs/hr 8.92 lbs/yr
<b>Toluene (CAS # 108-88-3)</b>					
Star # 143	3685	0.001	3.685		
Star # 25	19020	0.001	19.02		
Total			22.7	0.00259	99.1 lbs/hr 77500 lbs/yr
<b>Ethylbenzene (CAS # 100-41-4)</b>					
Star # 143	21600	0.0012	25.92	0.003	517000 lbs/yr
<b>Xylenes (CAS # 1330-20-7)</b>					
Star # 143	21600	0.021	453.6	0.05	58.9 lb/hr 181000 lbs/yr
<b>Diethanolamine (CAS # 111-42-2)</b>					
Star # 143	21600	0.001	21.6	0.0025	775 lbs/yr
<b>Propylene Glycol Monomethyl Ether (CAS # 107-98-2)</b>					
Lithochem LC 563-4	21600	0.03	648	0.0739	1810000 lbs/yr
<b>Ethylene Glycol Monomethyl Ether (CAS # 109-86-4)</b>					
Star # 143	21600	0.003	648	0.0739	28.3 lbs/hr 15500 lbs/yr
<b>Ethylene Glycol Ethyl Ether (CAS # 110-80-5)</b>					
Star # 143	21600	0.003	648	0.0739	1.13 lbs/hr 18100 lbs/yr
<b>Ethylene Glycol Monobutyl Ether (CAS # 111-76-2)</b>					
Star # 143	3685	0.1	368.50		
Varn Response 1150	8920	0.05	446.00		
Kelstar WP-937	8760	0.1	876.00		
Lithochem Alc. Sub.	7920	0.6	4752.00		
Total			6442.5	0.735	37.5 lb/hr
<i>See Next Page</i>					

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<i>Material</i>					
<b>Ethylene Glycol (CAS # 107-21-1)</b>	<i>Annual Usage In Lbs.</i>	<i>Wt. Conc. (Lb/Lb)</i>	<i>Toxic Emissions (lbs/yr)</i>	<i>Toxic Emissions (lbs/hr)</i>	<i>Tier 1 Emission levels at 100 meter receptor</i>
Varn Response 1150					
Kelstar WP-937	8920	0.04	356.80		
Lithochem Alc. Sub.	8760	0.13	1138.80		
Total	7920	0.3	2376.00		
<b>IPA (CAS # 67-63-0)</b>			3871.6	0.442	103000 lbs/yr
Lithochem					
IPA	7920	0.03	237.6	0.027	
Nicoat	6600	1	6600	0.027	
Kelstar Coating	20760	0.024	498.2	0.027	
Total	20760	0.03	622.8	0.027	
<b>Hexane (CAS # 110-54-3)</b>			7958.6	0.91	8.57 lbs/hr 1810000 lbs/yr
Lithochem					
<b>MEK (CAS # 78-93-3)</b>	21600	0.03	648	0.074	1810000 lbs/yr
Lithochem					
<b>Methanol (CAS # 67-56-1)</b>	21600	0.03	648	0.074	34.8 lb/hr
Lithochem					
<b>Napthalene (CAS # 91-20-3)</b>	21600	0.03	648	0.074	75 lb/hr 1030000 lb/yr
Lithochem					
<b>Ammonia (CAS # 7664-41-7)</b>	23340	0.001	23.34	0.00266	2330 lb/yr
Nicoat					
	20760	0.031	643.56	0.0735	58.9 lbs/hr 51700 lbs/yr

There will be no increase in the toxic emissions under this project, thus it is exempt from Rule 1401 requirements.

<b>RULES/REGULATION EVALUATION</b>
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▣ **RULE 212, PUBLIC NOTIFICATION**

√ **SECTION 212(c)(1):**

This section requires a public notice for all new or modified permit units that may emit air contaminants located within 1,000 feet from the outer boundary of a school. This source is not located within 1,000 feet from the outer boundary of a school. Therefore, public notice will not be required by this section.

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▼ **SECTION 212(c)(2):**

This section requires a public notice for all new or modified facilities which have on-site emission increases exceeding any of the daily maximums as specified by subparagraph (g). As shown in the following table, the emission increases are below the daily maximum limits specified by Rule 212(g). Therefore, these applications are not subject to this section.

LB/DAY	CO	NOX	PM <sub>10</sub>	ROG	Lead	SOX
<b>MAX. LIMIT</b>	220	40	30	30	3	60
<b>INCREASES</b>	0	0	0	0	0	0

▼ **SECTION 212(g):**

This section requires a public notice for all new or modified facilities which have on-site emission increases exceeding any of the daily maximums as specified in the table below. This equipment is replacement of functionally identical equipment without any potential to emit greater than the previous equipment. Therefore, these applications are not subject to this section.

▼ **SECTION 212(c)(3):**

Please, see Rule 1401 evaluation section. Therefore, these applications are not subject to this section.

▣ **RULES 401 & 402, VISIBLE EMISSIONS & NUISANCE**

AQMD database has no records of any visible emissions or nuisance complaints against this company.

▣ **RULE 1130, GRAPHIC ARTS**

▼ **SECTION (C)(1), VOC CONTENT OF INKS**

This paragraph limits the maximum VOC content of printing inks, coatings, and adhesives at 300 g/l less water and exempt compounds. The applicant is in compliance with these requirements by using inks and coatings with the following VOC content less water and exempt compounds.

Materials Used	Rule VOC Limit (gram/liter)	VOC as applied (gram/liter)	Compliance
Ink System Process Yellow	300	271	Yes
Ink System Process Cyan	300	186	Yes
Ink System Process Magenta	300	202	Yes
Ink System Process Black	300	186	Yes
Ink System PMS Colors	300	154	Yes
Nicoat High Gloss Coating	300	101	Yes
Ink System Gloss Varnish	300	185	Yes
Ink System Dull Varnish	300	18	Yes

▣

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**RULE 1130, GRAPHIC ARTS**

**v SECTION (C)(2), VOC CONTENT OF FOUNTAIN SOLUTION**

This paragraph limits the maximum VOC content of fountain solutions at 100 g/l or 0.83 lbs/gal (printing presses at this facility has refrigerated chillers). The company mainly uses Alcohol substitute in the fountain solution mixture. However, in some cases they need to use alcohol. The applicant is in compliance with these requirements by using fountain solutions with the following VOC contents.

Materials Mixed	Volume	VOC Content (lb/gal)	VOC Content Lbs	VOC (lb/gal)	Rule VOC Limit (lb/gal)	Compliance
Kelstar SF-5089	8.0 oz.	2.9	0.1813			
Water	128 oz	0.00	0.00			
Total	136 oz.		0.1813	0.171	0.83	Yes

Materials Mixed	Volume	VOC Content (lb/gal)	VOC Content Lbs	VOC (lb/gal)	Rule VOC Limit (lb/gal)	Compliance
Kelstar SF-5089	8.0 oz.	2.9	0.1813			
IPA	4.0 oz.	6.6	0.2063			
Water	128 oz	0.00	0.00			
Total	140 oz.		0.3876	0.3544	0.83	Yes

Materials Mixed	Volume	VOC Content (lb/gal)	VOC Content Lbs	VOC (lb/gal)	Rule VOC Limit (lb/gal)	Compliance
Kelstar SF-94	4.0 oz.	0.2	0.0063			
Kelstar HT-255	4.0 oz	6.2	0.1938			
Water	128 oz	0.00	0.00			
Total	136 oz.		0.2001	0.1883	0.83	Yes

Materials Mixed	Volume	VOC Content (lb/gal)	VOC Content Lbs	VOC (lb/gal)	Rule VOC Limit (lb/gal)	Compliance
Kelstar SF-94	4.0 oz.	0.2	0.0063			
Kelstar HT-255	4.0 oz	6.2	0.1938			
IPA	4.0 oz.	6.6	0.2063			
Water	128 oz	0.00	0.00			
Total	140 oz.		0.4064	0.3716	0.83	Yes

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□ **RULE 1171, SOLVENT CLEANING OPERATIONS**

According to MSDS provided by the applicant, clean-up material will comply with the Rule requirements.

Material Used	Rule VOC Limit (gm/liter)	VOC as Applied (gm/liter)	Compliance
EPS Alpha 8	100	96	Yes
Bottcher Feboclean BIO-3	100	0.4	Yes
Day V500 Hybrid UV Wash	480	480	Yes
Allied MRC 100	90	90	Yes

**REGULATION XIII**

□

**RULE 1303(a), BEST AVAILABLE CONTROL TECHNOLOGY (BACT)**

(a) VOC EMISSIONS

The use of Rule 1130 complaint inks and coatings, the fountain solution with less than 8% VOCs by volume, and blanket/roller washes complaint with Rule 1171 will satisfy BACT requirements. As discussed above the applicant will use complaint materials with the equipment. The following table for fountain solution shows < 8% VOC content. Thus, equipment is expected to comply with the BACT requirements.

Materials Mixed	Volume	VOC Content (lb/gal)	VOC Content Lbs	VOC Density Lb/gal	VOC Volume gal	VOC Volume Percentage
Kelstar SF-5089	8.0 oz.	2.9	0.1813	8.7	0.021	
Water	128 oz.	0.00	0.00	0	0	
Total	136 oz.		0.1813		0.021	1.98

Materials Mixed	Volume	VOC Content (lb/gal)	VOC Content Lbs	VOC Density Lb/gal	VOC Volume gal	VOC Volume Percentage
Kelstar SF-5089	8.0 oz.	2.9	0.1813	8.7	0.021	
IPA	4.0 oz.	6.6	0.2063	6.6	0.0313	
Water	128 oz.	0.00	0.00	0	0	
Total	140 oz.		0.3876		0.0523	4.78

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Materials Mixed	Volume	VOC Content (lb/gal)	VOC Content Lbs	VOC Density Lb/gal	VOC Volume gal	VOC Volume Percentage
Kelstar SF-94	4.0 oz.	2.9	0.1813	8.7	0.021	
Kelstar HT-255	4.0 oz	6.2	0.1937	7.9	0.0245	
Water	128 oz	0.00	0.00	0	0	
Total	136 oz.		0.375		0.0455	4.28

Materials Mixed	Volume	VOC Content (lb/gal)	VOC Content Lbs	VOC Density Lb/gal	VOC Volume gal	VOC Volume Percentage
Kelstar SF-94	4.0 oz.	2.9	0.1813	8.7	0.021	
Kelstar HT-255	4.0 oz	6.2	0.1937	7.9	0.0245	
IPA	4.0 oz	6.6	0.2063	6.6	0.0313	
Water	128 oz	0.00	0.00	0	0	
Total	140 oz.		0.		0.0768	7.02

▣ **RULE 1303(b)(1), MODELING**

No detailed modeling analysis is required for this project as no net emission increases for criteria pollutants from this facility or equipment under this project.

▣ **RULE 1303 (b)(2), EMISSION OFFSETS**

Emission offsets are not required for this project as no net emission increases for criteria pollutants from this facility under this project.

▣ **RULE 1401, NEW SOURCE REVIEW OF CARCINOGENIC AIR CONTAMINANTS**

This equipment is replacing a functionally identical permit unit with no increase in maximum rating or increase in the toxic emissions. Thus they are exempt from the rule requirements.

**REGULATION XXX**

This facility is not in the RECLAIM program. The proposed project is considered as a “minor permit revision” to the Title V permit for this facility.

Rule 3000(b)(12)(vi) defines a “minor permit revision” as any Title V permit revision that does not result in an increase in emissions of a pollutant subject to Regulation XIII – New Source Review (non-RECLAIM pollutants) or a hazardous air pollutant (HAP).

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The proposed project is not expected to result in an increase in emissions of a pollutant subject to Regulation XIII – New Source Review (non-RECLAIM pollutants) or a hazardous air pollutant (HAP), and therefore is considered as a “minor permit revision” pursuant to Rule 3000(b)(12)(A)(vi).

This proposed project is the 3<sup>rd</sup> permit revision to the renewed Title V permit issued to this facility on July 2005. The following table summarizes the permit revisions since the initial Title V permit:

<b>Revision</b>	<b>HAP</b>	<b>VOC</b>	<b>NOx</b>	<b>PM<sub>10</sub></b>	<b>SOx</b>	<b>CO</b>
1 <sup>st</sup> Permit Revision. Add device D99 to D100 to section H.	0	0	0	1	0	1
2 <sup>nd</sup> Permit Revision. Change of conditions on R1401 for each printing lines and admin. change to ICE (A/N 452185)	0	0	0	0	0	0
3 <sup>rd</sup> Permit Revision. Permits to Construct for lithographic presses (A/N 480044, 480045)	0	0	0	0	0	0
Cumulative Total	0	0	0	1	0	1
Maximum Daily	30	30	40	30	60	220

**CONCLUSIONS/RECOMMENDATIONS**

The proposed project is expected to comply with all applicable District Rules and Regulations. Since the proposed project is considered as a “minor permit revision”, 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 have any objections within the review period, a revised Title V permit will be issued to this facility.