

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT	PAGE	1
ENGINEERING AND COMPLIANCE DIVISION	APPL. NO.	517137
APPLICATION PROCESSING AND CALCULATION	PROCESSED BY	HD
	CHECKED BY	
	DATE	1/15/11

**PERMIT TO
CONSTRUCT/OPERATE EVALUATION**

Applicant's Name	Los Angeles Times Communications LLC
Company ID	124904
Mailing Address	2000 E 8th Street Los Angeles, CA 90021
Equipment Address	SAME AS ABOVE

EQUIPMENT DESCRIPTION:

LITHOGRAPHIC NEWSPAPER PRINTING SYSTEM "D", COLORLINER, AIR DRY, TWELVE UNIT PLUS FOLDER, CONSISTING OF:

1. SIX GOSS COLORLINER MONO UNITS, BLACK ONLY.
2. ONE MANROLAND COLORMAN FOUR-HIGH FOUR-COLOR UNIT.
3. FIVE GOSS COLORLINER, FOUR-HIGH FOUR-COLOR TOWER UNITS.
4. ONE GOSS FOLDER.

BACKGROUND:

Los Angeles Times submitted this pennit application as Class I on 12/17/2010 for Pennit to Construct and Operate to modify the above-described equipment located in City of Los Angeles. This is an existing facility in Los Angeles. This facility has permits to operate for 6 lithographic printing presses, 5 emergency ICEs, 2 boilers, 1 Ammonia storage tank and 1 ink dewatering system. The applicant is planning to modify an existing lithographic newspaper printing system operating under permit no. F69230 (a/no. 427659) by converting a Goss Colorliner Mono unit into a Four Goss Colorliner unit. The facility currently operates under a VOC facility cap of 432 Ibs/day and equipment cap of 175 Ib/day. The proposed modification will not increase the emissions from the printing operations. Therefore, the facility cap will remain unchanged. This is a Title V facility and currently operates under a Title V facility permit that was issued on May 6, 2002. The first renewal was issued on May 6, 2007. Review of the compliance file for this facility reveals that there are no records of nuisance complaints. However, there is a Notice to Comply issued to the company on March 19, 2010 to provide proof of timing retard on emergency engines and boiler source test. The facility provided the required data on March 31, 2010.

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PROCESS DESCRIPTION:

The company is in a business of printing daily newspaper. It operates six lithographic printing systems to produce LA Times daily newspaper. The applicant is proposing to modify its existing lithographic newspaper printing system operating under permit no. F69230 (also 427659) by converting a Goss Colorliner Mono unit into a Four Goss Colorliner unit to expand its color sections of the newspaper. Newspaper is fed through the printing unit and images are printed on the newsprint using offset lithographic printing technology. The operating hours for this press are 6.5 hrs/day, 7 days/week, and 52 weeks/yr.

EMISSIONS AND ANALYSIS:

ROG:

The use of graphic arts materials in printing press generates ROG emissions. The press has a daily limit of 175 lb/day. The applicant indicated that they will comply with this daily limit with the proposed modification. As such, since there is no emissions increase from the proposed modification, the hourly emissions from the press will remain the same as in the previous permit along with daily and yearly emissions. Also, the company indicated that they intend to stay within its facility-wide ROG limit of 432 lb/day.

Emission Calculations based on 2009 usage (post Modification- Facility assumed 11% increase from year 2009):

Ink	VOC Content lb VOC/lb Ink	Max. Usage/day	ROG Emission Factor	VOC Emissions/day
Black	0.0102	1533	0.05	0.78 x 1.11 = 0.87
Blue	0.0106	283	0.05	0.15 x 1.11 = 0.17
Red	0.0064	373	0.05	0.12 x 1.11 = 0.13
Yellow	0.009	373	0.05	0.17 x 1.11 = 0.19
			Total	1.35

Material	VOC Content as applied	Max. Usage/day	VOC Emissions/day
Blanket Wash	2.4	3	7.21 x 1.11 = 8.01
Fountain Solution	0.08	1.85	0.15 x 1.11 = 0.16
		Total	8.17

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However, for NSR entry, emissions from the previous permit will be entered.

Emissions from the printing operation are summarized in the following table (For NSR data entry):

Pollutant	Uncontrolled R1, lbs/hr	Uncontrolled R1 lbs/day	Controlled R2, lbs/hr	Controlled R2 lbs/day	30 Day Average lbs/day	Annual Emissions
ROG	12.4	85	12.4	85	86	30,843

Note: For AEIS data entry, 1 lb/hr of VOC will be entered (same as previous permit)

TOXICS:

The inks, fountain wash solution, blanket and Roller wash does not contain any toxic compounds identified in Rule 1401.

RULES:

- Rule 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. Since there are no schools within 1,000 feet of the facility, a public notice will not be required per this section.
- Rule 212(c)(2) & (g): These sections require a public notice for all new or modified facilities which have on-site emission increases for the equipment or the facility exceeding any of the daily maximums as specified in subdivision (g). Since no emission increase from the equipment or facility is expected, public notice will not be required by this section.
- Rule 212(c)(3): There will not be an increase in TACs resulting from the use of graphic arts materials Therefore, a public notice will not be required per this section
- Rule 401 Visible emissions are not expected with proper operation of this equipment.
- Rule 402 Operation of equipment is not expected to create a nuisance.
- Rule 1130: The inks used this equipment have VOC content of less than rule limit of 300 g/l in section (c) (1). The fountain solution mixture used in this press will be below the requirement of 80 g/l as indicated by the MSDS.
- Rule 1171: The clean-up material used for this equipment comply with VOC limits in subparagraph (c)(1)(C). Compliance is expected.
- REG. XIII The proposed change of condition will not result in an increase of emissions and therefore, will not trigger BACT requirements or modeling or emissions offsets.
- Rule 1401: The proposed modifications will not result in any increase air toxic contaminants, therefore, compliance with the requirements in this rule is expected.

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Regulation XXX:

This facility is not in the RECLAIM program. The proposed project is considered as a “de minimis significant permit revision” to the Title V permit for this facility as the company also plan to modify one of its existing printing presses along with this admin change application.

Rule 3000(b)(6) defines a “de minimis significant permit revision” as any Title V permit revision where the cumulative emission increases of non-RECLAIM pollutants or hazardous air pollutants (HAPs) from these permit revisions during the term of the permit are not greater than any of the emission threshold levels on the following page:

Air Contaminant	Daily Maximum (lbs/day)
HAP	30
VOC	30
NO _x	40
PM10	30
SO _x	60
CO	220

To determine if a project is considered as a “de minimis significant permit revision” for non-RECLAIM pollutants or HAPs, emission increases for non-RECLAIM pollutants or HAPs resulting from all permit revisions that are made after the issuance of the Title V renewal permit shall be accumulated and compared to the above threshold levels. This proposed project is the 2nd permit revision to the Title V renewal permit issued to this facility on May 6, 2007. The following table summarizes the cumulative emission increases resulting from all permit revisions since the Title V renewal permit was issued.

Title V Permit Revisions Summary

	Revision	HAP	VOC	NO _x	PM ₁₀	SO _x	CO
2nd	Permit Revision: Alteration to existing press to expand Color capacity (a/no. 517137), Admin Change on emergency engines (a/nos 517042-45.) to comply with Rule 1470.	0	0	0	0	0	0
Cumulative Total		0	0	0	0	0	0
Maximum Daily		30	30	40	30	60	220

Since the cumulative emission increases resulting from permit revision are not greater than any of the emission threshold levels, this proposed project is considered as a “de minimis significant permit revision”.

CONCLUSION:

The proposed project is expected to comply with all applicable District Rules and Regulations. Also, since the proposed project is considered as a “de minimis significant permit revision”, it is exempt from the public participation requirements under Rule 3006 (b). A proposed facility permit incorporating this permit revision will be submitted to EPA for a 45-day review pursuant to Rule

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3003(j). If EPA does not have any objections within the review period, a revised Title V permit will be issued to this facility.