



NOV 02 2009

Roger Ashlock
Quebecor World
2201 Cooper Avenue
Merced, CA 95348

**Re: Notice of Minor Title V Permit Modification
District Facility # N-1646
Project # N-1073959**

Dear Mr. Ashlock:

Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued N-1646-15-3, '-26-2, '-36-0, and '-38-0 into the Title V operating permit. Modification of the flexographic printing press #505 (N-1646-15-3) to limit ink usage to 6,100 lb/day, modification of the heatset offset lithographic printing press #531 (N-1646-26-2) to vent the drying oven to the facility shared 5.728 MMBtu/hr Megtec Cleanswitch regenerative thermal oxidizer (RTO), and install two new heatset offset lithographic printing presses #520 (N-1646-36-0) and #523 (N-1646-38-0) both served by the facility shared 9.5 MMBtu/hr Megtec Enterprise II or 18 MMBtu/hr Recco Retherm RTOs.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued N-1646-15-3, '-26-2, '-36-0, and '-38-0, emission increases, application, and previous Title V permit. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

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

Sincerely,

David Warner
Director of Permit Services

DW: KC/cm

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)
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NOV 02 2009

Gerardo C. Rios, Chief
Permits Office
Air Division
U.S. EPA - Region IX
75 Hawthorne St
San Francisco, CA 94105

**Re: Notice of Minor Title V Permit Modification
District Facility # N-1646
Project # N-1073959**

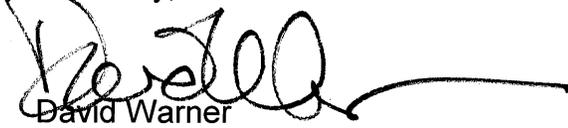
Dear Mr. Rios:

Enclosed for you to review is an application for minor Title V permit modification for the facility identified above. Quebecor World is proposing a Title V minor permit modification to incorporate the recently issued N-1646-15-3, '-26-2, '-36-0, and '-38-0 into the Title V operating permit. Modification of the flexographic printing press #505 (N-1646-15-3) to limit ink usage to 6,100 lb/day, modification of the heatset offset lithographic printing press #531 (N-1646-26-2) to vent the drying oven to the facility shared 5.728 MMBtu/hr Megtec Cleanswitch regenerative thermal oxidizer (RTO), and install two new heatset offset lithographic printing presses #520 (N-1646-36-0) and #523 (N-1646-38-0) both served by the facility shared 9.5 MMBtu/hr Megtec Enterprise II or 18 MMBtu/hr Recco Retherm RTOs.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued N-1646-15-3, '-26-2, '-36-0, and '-38-0, emission increases, application, and previous Title V permit. Please submit your written comments on this project within the 45-day comment period that begins on the date you receive this letter.

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

Sincerely,



David Warner
Director of Permit Services

DW: KC/cm

Enclosures

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Engineer Name	Kai Chan
Engineer's Regional Manager	Rupi Gill
Facility Name	Quebecor World
Facility #	N-1646
Project #	N-1073959
More than one ATC?	yes
ATC's (ex. Authorities to Construct S-134-3-2, '4-3, and '6-2)	N-1646-15-3, '-26-2, '-36-0, and '-38-0
Modification Details (Complete Sentences)	Modification of the flexographic printing press #505 (N-1646-15-3) to limit ink usage to 6,100 lb/day, modification of the heatset offset lithographic printing press #531 (N-1646-26-2) to vent the drying oven to the facility shared 5.728 MMBtu/hr Megtec Cleanswitch regenerative thermal oxidizer (RTO), and install two new heatset offset lithographic printing presses #520 (N-1646-36-0) and #523 (N-1646-38-0) both served by the facility shared 9.5 MMBtu/hr Megtec Enterprise II or 18 MMBtu/hr Recco Retherm RTOs.
Contact Receiving Proposed	Mr. Roger Ashlock
Mailing Address	2201 Cooper Avenue Merced, CA 95348

TITLE V APPLICATION REVIEW

Minor Modification
Project #: N-1073959

Engineer: Kai Chan
Date: October 29, 2009

Facility Number: N-1646
Facility Name: Quebecor World
Mailing Address: 2201 Cooper Avenue
Merced, CA 95348

Contact Name: Roger Ashlock
Phone: (209) 384-0444 ext. 288

Responsible Official: Roger Ashlock
Title: Environmental Coordinator

I. PROPOSAL

Quebecor World is proposing a Title V minor permit modification to incorporate the recently issued Authority to Construct (ATC) permits N-1646-15-3, N-1646-26-2, N-1646-36-0, and N-1646-38-0 into their Title V operating permit.

For ATC permit N-1646-15-3 (Flexo Printing Press #505), the facility is removing the permit condition limiting the combined quantity of inks used between flexo printing presses #505 and #506 to not exceed 6,100 lb/day. Flexo printing press #506 (N-1646-18-0) has been removed from the facility and flexo printing press #505 will be the only press limited to 6,100 lb/day of ink usage.

For ATC permit N-1646-26-2 (Heatset Offset Lithographic Printing Press #531), the facility will vent the associated drying ovens to the facility shared 5.75 MMBtu/hr Megtec Cleanswitch Model CS-300-95 natural gas-fired regenerative thermal oxidizer.

For ATC permits N-1646-36-0 (Heatset Offset Lithographic Printing Press #520) and N-1646-38-0 (Heatset Offset Lithographic Printing Press #523), the facility is installing new graphic arts printing operations.

The purpose of this evaluation is to identify all applicable requirements, determine if the facility will comply with the applicable requirements and to provide the legal and factual basis for the proposed revisions.

II. FACILITY LOCATION

2201 Cooper Avenue
Merced, CA

III. EQUIPMENT DESCRIPTION

N-1646-15-5: GRAPHIC ARTS PRINTING OPERATION CONSISTING OF A CERUTTI MODEL 45-1/2" 77" MAXINOVA (8-COLOR) FLEXOGRAPHIC PRINTING PRESS #505.

N-1646-26-5: GRAPHIC ARTS PRINTING OPERATION CONSISTING OF A GOSS GRAPHICS SYSTEMS, INC. MODEL C700-F HEATSET OFFSET LITHOGRAPHIC PRINTING PRESS (PRESS #531) WITH A 10.5 MMBTU/HR NATURAL GAS FIRED MEGTEC MODEL DUAL DRY III 119 DRYING OVEN VENTED TO A SHARED 5.728 MMBTU/HR MEGTEC CLEANSWITCH MODEL CS-300-95 NATURAL GAS FIRED REGENERATIVE THERMAL OXIDIZER.

N-1646-36-2: GRAPHIC ARTS PRINTING OPERATION CONSISTING OF ONE MAN ROLAND MODEL ROTOMANS 57.5" WIDE 8-COLOR HEATSET OFFSET LITHOGRAPHIC PRINTING PRESS (PRESS #520) AND TWO 9.9 MMBTU/HR NATURAL GAS FIRED MEGTEC MODEL DD III-135 DRYING OVENS (EACH CONSISTS OF AN 8.4 MMBTU/HR MAXON OVENPAK 400 BURNER AND A 1.5 MMBTU/HR MAXON APX BURNER) SERVED BY THE SHARED 9.5 MMBTU/HR MEGTEC ENTERPRISE II OR THE 18 MMBTU/HR REECO RETHERM MODEL E NATURAL GAS FIRED REGENERATIVE THERMAL OXIDIZERS.

N-1646-38-2: GRAPHIC ARTS PRINTING OPERATION CONSISTING OF ONE MAN ROLAND MODEL ROTOMAN S 64" WIDE 8-COLOR HEATSET OFFSET LITHOGRAPHIC PRINTING PRESS (PRESS #523) WITH ONE 9.4 MMBTU/HR NATURAL GAS FIRED MEGTEC MODEL DD III-135-2080 DRYING OVEN #1 (WITH MAXON LOW NOX BURNERS) AND ONE 9.0 MMBTU/HR NATURAL GAS FIRED MEGTEC MODEL DD III-135-2080 DRYING OVEN #2 (WITH MAXON LOW NOX BURNERS) EACH SERVED BY THE SHARED 9.5 MMBTU/HR MEGTEC ENTERPRISE II OR THE 18 MMBTU/HR REECO RETHERM MODEL E NATURAL GAS FIRED REGENERATIVE THERMAL OXIDIZERS.

IV. SCOPE OF EPA AND PUBLIC REVIEW

This change to a Title V permit is considered to be a minor modification and, as such, requires no public review.

V. APPLICABLE REQUIREMENTS

District Rule 2520, Federally Mandated Operating Permits (Adopted June 21, 2001)

VI. DESCRIPTION OF PROPOSED MODIFICATIONS

Permit Unit N-1646-15:

Quebecor World is proposing to incorporate Authority to Construct (ATC) permit N-1646-15-3 into the Title V Permit to Operate (PTO) as PTO N-1646-15-5 (Flexographic Printing Press #505). This ATC permit is to modify the permit condition limiting the daily quantity of inks used to not exceed 6,100 pounds between flexographic printing presses #505 and #506 to account for the removal of printing press #506 under permit N-1646-18-0. The facility is now proposing to limit the remaining printing press #505 to not exceed 6,100 lb of ink usage per day. A copy of the ATC permit N-1646-15-3 is included in Appendix B. The existing PTO is N-1646-15-2 and a copy is included in Appendix E.

Changes to Current Permit to Operate N-1646-15-2:

1. Permit condition 1. on the current PTO was replaced by permit condition 3. on the ATC permit and appears as condition 1. on the proposed PTO. This condition limits the ink usage as proposed by the applicant under the ATC permit.
2. Permit condition 2. on the current PTO and condition 5. on the ATC permit were replaced with condition 6. on the proposed PTO. This condition was replaced due to the latest amendments of District Rule 4607 (Graphic Arts and Paper, Film, Foil, and Fabric Coatings - 12/18/08 version), per Sections 5.2.1 and 5.2.2.
3. Permit condition 3. on the proposed PTO was added to enforce the work practices requirements of amended District Rule 4607 (12/18/08 version), per Section 5.10.
4. Permit condition 3. on the current PTO and condition 6. on the ATC permit were replaced with conditions 4. and 5. on the proposed PTO. These conditions were replaced due to the latest amendments of District Rule 4607 (12/18/08 version), per Section 5.1.

5. Permit condition 4 was removed on the current PTO. District Rule 4607 does not define or list VOC content limits for "low VOC inks". In addition, the VOC content of the flexographic inks allowed for this permit unit are limited on permit conditions 4. and 5. in the proposed PTO.
6. Permit conditions 6. and 7. on the current PTO and conditions 8. and 9. on the ATC permit were replaced with condition 8. on the proposed PTO. These conditions were replaced due to the latest amendments of District Rule 4607 (12/18/08 version), per Section 5.8.1.
7. Permit conditions 8., 9., and 10. on the current PTO and conditions 10., 11., and 12. on the ATC permit were replaced with conditions 9., 10., and 11., on the proposed PTO. These conditions were replaced due to the latest amendments of District Rule 4607 (12/18/08 version), per Sections 5.8.3 through 5.8.5.
8. Permit condition 12. on the current PTO and condition 14. on the ATC permit were replaced with condition 13. on the proposed PTO. This condition was replaced due to the latest amendments of District Rule 4607 (12/18/08 version), per Section 6.1.1.
9. Permit condition 14. on the current PTO and condition 16. on the ATC permit were replaced with condition 15. on the proposed PTO. These conditions were replaced due to the latest amendments to District Rule 4607 (12/18/08 version), per Section 6.1.2.
10. Additional record keeping requirements due to the latest amendments of District Rule 4607 (12/18/08 version per Section 6.1.2.) appears as conditions 16. and 17. on the proposed PTO.
11. Permit condition 17. from the ATC permit appears as condition 18. on the proposed PTO. This condition was added to require the facility to maintain daily records to verify their daily VOC emission limits.
12. Permit conditions 1., 2., and 4. on the ATC permit were deleted since they already appear on the facility-wide permit N-1646-0-1.
13. Permit condition 19. on the ATC permit was deleted since this condition was satisfied when permit unit N-1646-18 was deleted.
14. Permit condition 20. on the ATC permit was deleted since this condition was satisfied by the applicant's submittal of the application for this Title V permitting action.

Permit Unit N-1646-26:

Quebecor World is proposing to incorporate ATC permit N-1646-26-2 into the Title V PTO as N-1646-26-5 (Heatset Offset Lithographic Printing Press #531). This ATC permit was issued to vent the emissions from the drying oven serving this lithographic printing press to the facility shared 5.728 MMBtu/hr Megtec Cleanswitch Model CS-300-95 natural gas fired regenerative thermal oxidizer. The drying oven serving this printing press is currently vented to the facility shared 9.5 MMBtu/hr Megtec Enterprise II or 18 MMBtu/hr Reeco Retherm Model E natural gas fired regenerative thermal oxidizers. These oxidizers will no longer serve the drying oven on this printing press. A copy of ATC permit N-1646-26-2 is included in Appendix B. The existing PTO is N-1646-26-1 and a copy is included in Appendix E.

Changes to Current Permit to Operate N-1646-26-1:

1. Permit condition 4. from the ATC permit appears as condition 1. on the proposed PTO. This condition was added to require the facility to properly maintain all equipment associated with this permit.
2. Permit condition 6. from the ATC permit appears as condition 3. on the proposed PTO. This condition was added to require the facility to install and maintain a fuel flow meter to verify and maintain records of the annual fuel usage for the regenerative thermal oxidizer.
3. Permit conditions 4., 5., and 6. on the current PTO was replaced by permit conditions 9., 10, and 11. on the ATC permit and appears as conditions 6., 7., and 8. on the proposed PTO. These conditions were replaced due to the proposed use of one regenerative thermal oxidizer instead of two regenerative thermal oxidizers.
4. Permit conditions 7., 8., and 9. on the current PTO and conditions 15., 16., and 17. on the ATC permit were replaced with conditions 11., 12., and 13., on the proposed PTO. These conditions were replaced due to the latest amendments of District Rule 4607 (12/18/08 version), per Sections 5.8.3 through 5.8.5.
5. Permit condition 11. on the current PTO and condition 33. on the ATC permit were replaced with condition 28. on the proposed PTO. This condition was replaced due to the latest amendments of District Rule 4607 (12/18/08 version), per Section 6.1.1.

6. Permit condition 15. on the current PTO was replaced by ATC permit conditions 21. through 24. and appears as conditions 18. through 21. on the proposed PTO. These emission rate limits were separated to clearly indicate the specific limits for each pollutant.
7. Permit condition 16. on the current PTO was replaced by ATC permit conditions 25. through 29. and appears as conditions 22. through 26. on the proposed PTO. These emission rate limits indicate the proposed emission rate on the new shared Megtec Cleanswitch regenerative thermal oxidizer.
8. Permit condition 17. on the current PTO and condition 34. on the ATC permit were replaced with condition 29. on the proposed PTO. These conditions were replaced due to the latest amendments to District Rule 4607 (12/18/08 version), per Section 6.1.2.
9. Permit conditions 23. through 30. on the current PTO appears as conditions 37. through 44. on the proposed PTO.
10. Permit condition 12. and 13. on the ATC permit were replaced with condition 10. on the current PTO. These conditions were replaced due to the latest amendments to District Rule 4607 (12/18/08 version), per Section 5.8.1.
11. Permit condition 15. on the proposed PTO was added to enforce the work practices requirements of amended District Rule 4607 (12/18/08 version), per Section 5.10.
12. Permit condition 32. from the ATC permit appears as condition 27. on the proposed PTO. This condition was added to enforce the applicant's proposed natural gas fuel usage limit on the proposed shared Megtec Cleanswitch regenerative thermal oxidizer.
13. Permit condition 37. from the ATC permit appears as condition 32. on the proposed PTO. This condition was added to require the facility to maintain a daily record to verify compliance with their facility-wide VOC emissions limit of 235.6 lb/day.
14. Permit condition 40. from the ATC permit appears as condition 35. on the proposed PTO. This condition was added to require the facility to maintain a daily record to verify compliance with their proposed natural gas fuel usage limit for the shared Megtec Cleanswitch regenerative thermal oxidizer.
15. Permit conditions 1., 2., 3., 30. and 31. on the ATC permit were deleted since they already appear on the facility-wide permit N-1646-0-1.

16. Permit condition 46. on the ATC permit was deleted since this condition was satisfied by the applicant's submittal of an ATC permit application under project #N-1074543 to modify permit unit N-1646-26 for Rule 4309 (Dryers, Dehydrators, and Ovens) compliance.
17. Permit condition 47. on the ATC permit was deleted since this condition was satisfied by the applicant's submittal of the application for this Title V permitting action.

Permit Unit N-1646-36:

Quebecor World is proposing to replace their existing heatset offset lithographic printing press #518 under permit N-1646-17-2 with a new heatset offset lithographic printing press #520 with drying ovens served by facility shared 9.5 MMBtu/hr Megtec Enterprise II or 18 MMBtu/hr Reeco Retherm Model E natural gas fired regenerative thermal oxidizers. This modification will not be for a routine replacement unit since the replacement unit will be a higher capacity unit with a greater daily emission limits. If applicable, the Compliance Assurance Monitoring (CAM) requirements of 40 CFR Part 64 will be addressed for this permit unit during the processing of the facility's Title V permit renewal project⁽¹⁾. A copy of the ATC permit N-1646-36-0 is included in Appendix B.

Proposed PTO N-1646-36-2:

1. Permit conditions 1., 2., 3., 31. and 32. on the ATC permit were deleted since they already appear on the facility-wide permit N-1646-0-1.
2. Permit conditions 13. through 17. on the ATC permit were replaced with conditions 10. through 13. on the proposed PTO. These conditions were replaced due to the latest amendments of District Rule 4607 (12/18/08 version), per Sections 5.8.1 through 5.8.5.
3. Permit condition 15. on the proposed PTO was added to enforce the work practices requirements of amended District Rule 4607 (12/18/08 version), per Section 5.10.
4. Permit condition 34. on the ATC permit was replaced with condition 29. on the proposed PTO. This condition was replaced due to the latest amendments of District Rule 4607 (12/18/08 version), per Section 6.1.1.

¹ Per District practice as referenced under FYI-89.

5. Permit condition 36. on the ATC permit was replaced with condition 30. on the proposed PTO. This condition was replaced due to the latest amendments of District Rule 4607 (12/18/08 version), per Section 6.1.2.1.
6. Permit condition 44. on the ATC permit was deleted since this condition was satisfied when permit unit N-1646-17 was deleted.
7. Permit condition 45. on the ATC permit was deleted since this condition was satisfied by the applicant's submittal of the application for this Title V permitting action.

Permit Unit N-1646-38:

Quebecor World is proposing to install a new graphic arts printing operation consisting of heatset offset lithographic printing press #523 with drying ovens served by facility shared 9.5 MMBtu/hr Megtec Enterprise II or 18 MMBtu/hr Reeco Retherm Model E natural gas fired regenerative thermal oxidizers. If applicable, the Compliance Assurance Monitoring (CAM) requirements of 40 CFR Part 64 will be addressed for this permit unit during the processing of the facility's Title V renewal project⁽²⁾. A copy of the ATC permit N-1646-38-0 is included in Appendix B.

Proposed PTO N-1646-38-2:

1. Permit conditions 1., 2., 3., 31. and 32. on the ATC permit were deleted since they already appear on the facility-wide permit N-1646-0-1.
2. Permit conditions 14. through 18. on the ATC permit were replaced with conditions 11. through 14. on the proposed PTO. These conditions were replaced due to the latest amendments of District Rule 4607 (12/18/08 version), per Sections 5.8.1 through 5.8.5.
3. Permit condition 16. on the proposed PTO was added to enforce the work practices requirements of amended District Rule 4607 (12/18/08 version), per Section 5.10.
4. Permit condition 35. on the ATC permit was replaced with condition 30. on the proposed PTO. This condition was replaced due to the latest amendments of District Rule 4607 (12/18/08 version), per Section 6.1.1.

² Per District practice as referenced under FYI-89.

5. Permit condition 37. on the ATC permit was replaced with condition 31. on the proposed PTO. This condition was replaced due to the latest amendments of District Rule 4607 (12/18/08 version), per Section 6.1.2.1.
6. Permit condition 45. on the ATC permit was deleted since this condition was satisfied by the applicant's submittal of an ATC permit application under project #N-1093258 to modify permit unit N-1646-38 for Rule 4309 (Dryers, Dehydrators, and Ovens) compliance.
7. Permit condition 46. on the ATC permit was deleted since this condition was satisfied by the applicant's submittal of the application for this Title V permitting action.

VII. COMPLIANCE

In accordance with Rule 2520, 3.20, these modifications:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;
3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:
 - a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
 - b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; and
5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
6. Do not seek to consolidate overlapping applicable requirements.

In accordance with Rule 2520, the application meets the procedural requirements of section 11.4 by including;

1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
2. The source's suggested draft permit; and
3. Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used.

Compliance is expected with this rule.

VIII. APPENDICES

Appendix A: Proposed Draft Title V Operating Permits N-1646-15-5, N-1646-26-5, N-1646-36-2, and N-1646-38-2

Appendix B: Authority to Construct Permits N-1646-15-3, N-1646-26-2, N-1646-36-0, and N-1646-38-0

Appendix C: Emissions Increases

Appendix D: Permit Applications

Appendix E: Previous Title V Operating Permits N-1646-15-2 and N-1646-26-1 and Facility-Wide Title V Operating Permit N-1646-0-1

APPENDIX A

Proposed Modified Title V Operating Permits No.
N-1646-15-5, -26-5, -36-2, & -38-2

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1646-15-5

EXPIRATION DATE: 09/30/2008

EQUIPMENT DESCRIPTION:

GRAPHIC ARTS PRINTING OPERATION CONSISTING OF A CERUTTI MODEL 45-1/2" 77" MAXIMOVA (8-COLOR) FLEXOGRAPHIC PRINTING PRESS #505.

PERMIT UNIT REQUIREMENTS

1. The total amount of inks used shall not exceed 6,100 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Total Volatile Organic Compound (VOC) emissions from the entire stationary source shall not exceed 235.6 pounds in any single day. [District NSR Rule] Federally Enforceable Through Title V Permit
3. 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
4. Prior to January 1, 2010, for flexographic printing operations, the VOC content of graphic arts materials (as applied, less water and exempt compounds) shall not exceed any of the following limits: Flexographic Inks on Porous Substrates: 300 g/l (2.5 lb/gal); Inks: 300 g/l (2.5 lb/gal); Coatings: 300 g/l (2.5 lb/gal), Adhesives: 150 g/l (1.25 lb/gal); Web Splicing Adhesive: 300 g/l (2.5 lb/gal). [District Rule 4607] Federally Enforceable Through Title V Permit
5. On and after January 1, 2010, for flexographic printing operations, the VOC content of graphic arts materials (as applied, less water and exempt compounds) shall not exceed any of the following limits: Flexographic Inks on Porous Substrates: 225 g/l (1.88 lb/gal); Inks: 300 g/l (2.5 lb/gal); Coatings: 300 g/l (2.5 lb/gal), Adhesives: 150 g/l (1.25 lb/gal); Web Splicing Adhesives: 150 g/l (1.25 lb/gal). [District Rule 4607] Federally Enforceable Through Title V Permit
6. For flexographic printing operations, use of specialty inks, as defined in Rule 4607, shall not exceed two gallons in a calendar day and 120 gallons in a calendar year. The VOC content of the specialty inks shall not exceed 300 g/l (2.5 lb/gal), less water and exempt compounds, as applied. [District Rule 4607] Federally Enforceable Through Title V Permit
7. Water and non-VOC emitting soaps shall be used for cleanup. [District NSR Rule] Federally Enforceable Through Title V Permit
8. The VOC content of organic solvents used to perform surface preparation or solvent cleaning shall not exceed the VOC content limits specified in Table 7 of Rule 4607 (12/18/08 version of Rule 4607). [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.

9. 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
10. 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
11. 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
12. 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
13. Permittee shall maintain a current file of coatings, inks, adhesives, fountain solutions, wash primers, and solvents in use and in storage. 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
14. The permittee shall record on a daily basis, the type and amount of each ink, coating, adhesive, fountain solution, wash primer, and solvent used. [District Rule 4607] Federally Enforceable Through Title V Permit
15. 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
16. The permittee shall record on a monthly basis, the type and amount of each coating, adhesive, wash primer, and solvent used. [District Rule 4607] Federally Enforceable Through Title V Permit
17. 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
18. 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. [District Rule 1070] Federally Enforceable Through Title V Permit
19. All records shall be retained for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rules 1070, 2520, and 4607] Federally Enforceable Through Title V Permit

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

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1646-26-5

EXPIRATION DATE: 09/30/2008

EQUIPMENT DESCRIPTION:

GRAPHIC ARTS PRINTING OPERATION CONSISTING OF A GOSS GRAPHICS SYSTEMS, INC. MODEL C700-F HEATSET OFFSET LITHOGRAPHIC PRINTING PRESS (PRESS #531) WITH A 10.5 MMBTU/HR NATURAL GAS FIRED MEGTEC MODEL DUAL DRY III 119 DRYING OVEN VENTED TO A SHARED 5.728 MMBTU/HR MEGTEC CLEANSWITCH MODEL CS-300-95 NATURAL GAS FIRED REGENERATIVE THERMAL OXIDIZER.

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 NSR Rule] Federally Enforceable Through Title V Permit
2. The drying oven and regenerative thermal oxidizers shall be fired exclusively on natural gas. [District NSR Rule] 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 thermal oxidizer shall be installed, utilized and maintained. [District Rules 2201] Federally Enforceable Through Title V Permit
4. The drying oven serving the heatset offset printing press shall be maintained under negative pressure and shall be vented through the thermal incinerator at all times except during periods of start-up while the dryer is being air purged. [District NSR Rule] Federally Enforceable Through Title V Permit
5. The collection system for the dryer exhaust and for all fugitive VOC emissions shall have a minimum capture efficiency of 90%. [District Rules 2201 and 4607] Federally Enforceable Through Title V Permit
6. The thermal oxidizer shall be operated with a minimum VOC destruction efficiency of 98%. [District Rules 2201 and 4607] Federally Enforceable Through Title V Permit
7. The thermal oxidizer shall be operated at a minimum temp. of 1400 deg. F. The incinerator 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
8. The thermal oxidizer shall be equipped with an operational continuous temperature monitoring and recording instrument. [District Rules 2201 and 2520 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
9. The Volatile Organic Compound (VOC) content of the printing inks as applied (excluding water and exempt compounds) shall be less than 45% by weight and the VOC content of the fountain solutions shall be less than 15% by volume. [District NSR Rule] Federally Enforceable Through Title V Permit
10. The VOC content of organic solvents used to perform surface preparation or solvent cleaning 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.

11. 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
12. 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
13. 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
14. 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
15. 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
16. VOC emissions from the printing inks and solvents shall not exceed 61.4 pounds in any one day. [District NSR Rule] Federally Enforceable Through Title V Permit
17. The NOx emission concentration from the drying oven shall not exceed 65 ppmv, dry, corrected to 3% oxygen (O2). [District NSR Rule] Federally Enforceable Through Title V Permit
18. The CO emissions rate from the drying oven shall not exceed 0.084 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
19. The PM10 emissions rate from the drying oven shall not exceed 0.0076 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
20. The SOx emissions rate from the drying oven shall not exceed 0.00285 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
21. The VOC emissions rate from the drying oven shall not exceed 0.0055 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
22. The NOx emission rate from the regenerative thermal oxidizer shall not exceed 0.18 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
23. The CO emissions rate from the regenerative thermal oxidizer shall not exceed 0.07 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
24. The PM10 emissions rate from the regenerative thermal oxidizer shall not exceed 0.01 lb/MMBtu. [District Rule 2201] 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.

25. The SOx emissions rate from the regenerative thermal oxidizer shall not exceed 0.00285 lbs/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
26. The VOC emissions rate from the regenerative thermal oxidizer shall not exceed 0.02 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
27. 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 Rule 2201] Federally Enforceable Through Title V Permit
28. 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
29. 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
30. 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
31. The permittee shall maintain daily records of the quantity of VOC emitted (in pounds) from the printing press. [District Rules 1070 and 2520] Federally Enforceable Through Title V Permit
32. The permittee shall maintain daily records of the cumulative quantity of VOC emitted (in pounds) from all graphic arts printing operations at the facility. [District Rule 1070 and 2201] Federally Enforceable Through Title V Permit
33. A daily log of fuel usage for each drying oven and each thermal oxidizer at the facility shall be maintained on the premises at all times. [District NSR Rule] Federally Enforceable Through Title V Permit
34. The permittee shall maintain daily records of the thermal oxidizers operational temperature. [District Rule 2520 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
35. The permittee shall maintain a record of the cumulative annual quantity of natural gas used (in cubic feet) by the 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
36. All records shall be retained for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rules 1070, 2520, and 4607] Federally Enforceable Through Title V Permit
37. Source testing to demonstrate compliance with the VOC destruction efficiency of each regenerative thermal oxidizer shall be conducted on an annual basis. [District NSR Rule] Federally Enforceable Through Title V Permit
38. 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
39. 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
40. Source testing to determine the destruction efficiency of the 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
41. 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
42. 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

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

43. 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
44. 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.

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1646-36-2

EXPIRATION DATE: 09/30/2008

EQUIPMENT DESCRIPTION:

GRAPHIC ARTS PRINTING OPERATION CONSISTING OF ONE MAN ROLAND MODEL ROTOMANS 57.5" WIDE 8-COLOR HEATSET OFFSET LITHOGRAPHIC PRINTING PRESS (PRESS #520) AND TWO 9.9 MMBTU/HR NATURAL GAS FIRED MEGTEC MODEL DD III-135 DRYING OVENS (EACH CONSISTS OF AN 8.4 MMBTU/HR MAXON OVENPAK 400 BURNER AND A 1.5 MMBTU/HR MAXON APX BURNER) SERVED BY THE SHARED 9.5 MMBTU/HR MEGTEC ENTERPRISE II OR THE 18 MMBTU/HR REECO RETHERM MODEL E NATURAL GAS FIRED REGENERATIVE THERMAL OXIDIZERS.

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 NSR Rule] Federally Enforceable Through Title V Permit
2. The drying ovens and regenerative thermal oxidizers shall be fired exclusively on natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
3. 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
4. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102] Federally Enforceable Through Title V Permit
5. 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
6. Each thermal oxidizer shall be operated with a minimum VOC destruction efficiency of 98%. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Each thermal oxidizer shall be operated at a minimum temp. of 1400 deg. F. The incinerator shall be preheated to 1400 deg. F prior to the start-up of the heatset offset printing operation. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Each thermal oxidizer shall be equipped with an operational continuous temperature monitoring and recording instrument. [District Rule 2201] Federally Enforceable Through Title V Permit
9. 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
10. The VOC content of organic solvents used to perform surface preparation or solvent cleaning 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.

11. 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
12. 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
13. 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
14. 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
15. 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
16. VOC emissions from the printing inks and solvents shall not exceed 50.0 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
17. The NOx emission concentration from the Maxon Ovenpak burner in the drying ovens shall not exceed 167 ppmv, dry, corrected to 3% oxygen (O2). [District Rule 2201] Federally Enforceable Through Title V Permit
18. The NOx emission concentration from the Maxon APX burner in the drying ovens shall not exceed 100 ppmv, dry, corrected to 3% oxygen (O2). [District Rule 2201] Federally Enforceable Through Title V Permit
19. The CO emissions rate from the drying ovens shall not exceed 0.084 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
20. The PM10 emissions rate from the drying ovens shall not exceed 0.0076 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
21. The SOx emissions rate from the drying ovens shall not exceed 0.00285 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
22. The VOC emissions rate from the drying ovens shall not exceed 0.0055 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
23. The NOx emission rate from the regenerative thermal oxidizers shall not exceed 0.1 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
24. The CO emissions rate from the regenerative thermal oxidizers shall not exceed 0.084 lb/MMBtu. [District Rule 2201] 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.

25. The PM10 emissions rate from the regenerative thermal oxidizers shall not exceed 0.0076 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
26. The SOx emissions rate from the regenerative thermal oxidizers shall not exceed 0.00285 lbs/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
27. The VOC emissions rate from the regenerative thermal oxidizers shall not exceed 0.0055 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
28. The total quantity of natural gas used in the drying ovens under this permit shall not exceed 18.7 million cubic feet in any one calendar year. [District Rule 2201] Federally Enforceable Through Title V Permit
29. 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
30. 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
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 2201 & 4607] Federally Enforceable Through Title V Permit
32. 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 each thermal oxidizer. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
33. The permittee shall maintain a record of the cumulative annual quantity of natural gas used (in cubic feet) by the drying ovens under this permit. The cumulative total quantity of natural gas used shall be updated monthly. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
34. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070 and 4607] Federally Enforceable Through Title V Permit
35. 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
36. 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
37. 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
38. 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

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

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1646-38-2

EXPIRATION DATE: 09/30/2008

EQUIPMENT DESCRIPTION:

GRAPHIC ARTS PRINTING OPERATION CONSISTING OF ONE MAN ROLAND MODEL ROTOMAN S 64" WIDE 8-COLOR HEATSET OFFSET LITHOGRAPHIC PRINTING PRESS (PRESS #523) WITH ONE 9.4 MMBTU/HR NATURAL GAS FIRED MEGTEC MODEL DD III-135-2080 DRYING OVEN #1 (WITH MAXON LOW NOX BURNERS) AND ONE 9.0 MMBTU/HR NATURAL GAS FIRED MEGTEC MODEL DD III-135-2080 DRYING OVEN #2 (WITH MAXON LOW NOX BURNERS) EACH SERVED BY THE SHARED 9.5 MMBTU/HR MEGTEC ENTERPRISE II OR THE 18 MMBTU/HR REECO RETHERM MODEL E NATURAL GAS FIRED REGENERATIVE THERMAL OXIDIZERS.

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 NSR Rule] Federally Enforceable Through Title V Permit
2. The drying ovens and regenerative thermal oxidizers 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 each drying oven shall be installed, utilized and maintained. [District Rules 2201] Federally Enforceable Through Title V Permit
4. 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
5. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102] Federally Enforceable Through Title V Permit
6. 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
7. Each thermal oxidizer shall be operated with a minimum VOC destruction efficiency of 98%. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Each thermal oxidizer shall be operated at a minimum temp. of 1400 deg. F. The incinerator shall be preheated to 1400 deg. F prior to the start-up of the heatset offset printing operation. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Each thermal oxidizer shall be equipped with an operational continuous temperature monitoring and recording instrument. [District Rule 2201] Federally Enforceable Through Title V Permit
10. 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
11. The VOC content of organic solvents used to perform surface preparation or solvent cleaning 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.

12. 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
13. 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
14. 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
15. 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
16. 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
17. VOC emissions from the printing inks and solvents shall not exceed 50.0 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
18. The NOx emission concentration from the drying ovens shall not exceed 0.036 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
19. The CO emissions rate from the drying ovens shall not exceed 0.276 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
20. The PM10 emissions rate from the drying ovens shall not exceed 0.0076 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
21. The SOx emissions rate from the drying ovens shall not exceed 0.00285 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
22. The VOC emissions rate from the drying ovens shall not exceed 0.0055 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
23. The NOx emission rate from the regenerative thermal oxidizers shall not exceed 0.1 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
24. The CO emissions rate from the regenerative thermal oxidizers shall not exceed 0.084 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
25. The PM10 emissions rate from the regenerative thermal oxidizers shall not exceed 0.0076 lb/MMBtu. [District Rule 2201] 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.

26. The SO_x emissions rate from the regenerative thermal oxidizers shall not exceed 0.00285 lbs/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
27. The VOC emissions rate from the regenerative thermal oxidizers shall not exceed 0.0055 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
28. The total quantity of natural gas used in the drying ovens under this permit unit shall not exceed 137,000 cubic feet in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
29. The total quantity of natural gas used in the drying ovens under this permit unit shall not exceed 50.0 million cubic feet in any one calendar year. [District Rule 2201] Federally Enforceable Through Title V Permit
30. 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 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
32. 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 2201 & 4607] Federally Enforceable Through Title V Permit
33. 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 each thermal oxidizer. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
34. The permittee shall maintain a record of the cumulative annual quantity of natural gas used (in cubic feet) by the drying ovens under this permit. The cumulative total quantity of natural gas used shall be updated monthly. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
35. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070 and 4607] Federally Enforceable Through Title V Permit
36. 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
37. 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
38. 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
39. 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

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

DRAFT

APPENDIX B

Authority to Construct Permits No.
N-1646-15-3, -26-2, -36-0, & -38-0



San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

COPY

AUTHORITY TO CONSTRUCT

PERMIT NO: N-1646-15-3

ISSUANCE DATE: 04/25/2007

LEGAL OWNER OR OPERATOR: QUEBECOR WORLD
MAILING ADDRESS: PO BOX 3139
MERCED, CA 95344

LOCATION: 2201 COOPER AVE
MERCED, CA

EQUIPMENT DESCRIPTION:

MODIFICATION OF THE GRAPHIC ARTS PRINTING OPERATION CONSISTING OF A CERUTTI MODEL 45.5" X 77" MAXINOVA FLEXOGRAPHIC PRINTING PRESS #505 TO REMOVE THE PERMIT CONDITION LIMITING THE USE OF INKS BETWEEN PRINTING PRESSES #505 AND #506 TO NOT EXCEED 6,100 LB/DAY. PRESS #506 (PERMIT N-1646-18-0) HAS BEEN REMOVED FROM THE FACILITY AND PRESS #505 WILL BE THE ONLY PRESS LIMITED TO 6,100 LB/DAY.

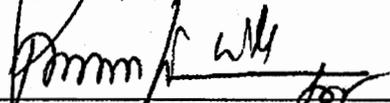
CONDITIONS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
3. The total amount of inks used shall not exceed 6,100 pounds per day. [District NSR Rule]
4. Total Volatile Organic Compound (VOC) emissions from the entire stationary source shall not exceed 235.6 pounds in any single day. [District NSR Rule] Federally Enforceable Through Title V Permit
5. For flexographic printing operations, use of specialty inks, as defined in Rule 4607, shall not exceed two gallons in a calendar day and 120 gallons in a calendar year. [District Rule 4607, 5.2] Federally Enforceable Through Title V Permit
6. For flexographic printing operations, VOC content of graphic arts materials shall not exceed any of the following limits: ink: 300 g/l (2.5 lb/gal), coating: 300 g/l (2.5 lb/gal), adhesive: 150 g/l (1.25 lb/gal), metallic ink: 485 g/l (4.1 lb/gal), matte finish ink: 535 g/l (4.5 lb/gal), web splicing adhesive: 300 g/l (2.5 lb/gal). [District Rule 4607, 5.1] Federally Enforceable Through Title V Permit
7. Water and non-VOC emitting soaps shall be used for cleanup. [District NSR Rule] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU **MUST** NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO


DAVID WARNER, Director of Permit Services

N-1646-15-3 Apr 25 2007 4 18PM -- CHANK Joint Inspection NOT Required

8. Solvents to perform surface preparation or cleanup shall not exceed the VOC content and composite vapor pressure limits of Rule 4607 (Graphic Arts) Table 6. [District Rule 4607, 5.8.3] Federally Enforceable Through Title V Permit
9. No owner or operator shall use organic solvents for cleaning operations that exceed the VOC content limit specified in Table 6, Rule 4607 (12/20/01 version of Rule 4607). [District Rule 4607, 5.8.3] Federally Enforceable Through Title V Permit
10. For a permittee using any solvent containing more than 50 g/L of VOC for organic solvent cleaning, cleaning activities shall be by one of the following methods: wipe cleaning; application of solvent using nonpropellant-induced, hand-held spray bottles; non-atomized solvent flow method, or solvent flushing method. [District Rule 4607, 5.8.6] Federally Enforceable Through Title V Permit
11. For a permittee using any solvent containing more than 50 g/L 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. [District Rule 4607, 5.8.7] Federally Enforceable Through Title V Permit
12. For a permittee using any solvent containing more than 50 g/L 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 component part(s) being cleaned 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, 5.8.8] 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, 5.8.9] Federally Enforceable Through Title V Permit
14. Permittee shall maintain a current file of coatings, inks, adhesives, fountain solutions, wash primers, and solvents in use and in storage. 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, density, and composite vapor pressure. [District Rule 4607, 6.1.1] Federally Enforceable Through Title V Permit
15. 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, 6.1.2.2] Federally Enforceable Through Title V Permit
16. 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 (12/20/01 version of Rule 4607). [District Rule 4607, 6.1.2.1] Federally Enforceable Through Title V Permit
17. 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. [District Rule 1070]
18. All records shall be retained for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rules 1070, 4.0, 2520, 9.4.2, and 4607, 6.1.6] Federally Enforceable Through Title V Permit
19. Permit to Operate N-1646-18 shall be deleted prior to or at the same time as this Authority to Construct permit (N-1646-15-3) is implemented [District Rule 2080]
20. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit



San Joaquin Valley
Air Pollution Control District

COPY

AUTHORITY TO CONSTRUCT

PERMIT NO: N-1646-26-2

ISSUANCE DATE: 07/28/2006

LEGAL OWNER OR OPERATOR: QUEBECOR WORLD
MAILING ADDRESS: PO BOX 3139
MERCED, CA 95344

LOCATION: 2201 COOPER AVE
MERCED, CA

EQUIPMENT DESCRIPTION:

MODIFICATION OF THE GRAPHIC ARTS PRINTING OPERATION CONSISTING OF A GOSS GRAPHICS SYSTEMS, INC. MODEL C700-E HEATSET OFFSET LITHOGRAPHIC PRINTING PRESS (PRESS #531) SERVED BY A 10.5 MMBTU/HR NATURAL GAS FIRED MEGTEC MODEL DUEL DRY III 119 DRYING OVEN TO VENT THE DRYING OVEN TO THE SHARED 5.728 MMBTU/HR MEGTEC CLEANSWITCH MODEL CS-300-95 NATURAL GAS FIRED REGENERATIVE THERMAL OXIDIZER.

CONDITIONS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (11/15/01). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101, and County Rules 401 (in all eight counties in the San Joaquin Valley)] Federally Enforceable Through Title V Permit
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
4. 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 NSR Rule]
5. The drying oven and regenerative thermal oxidizers shall be fired exclusively on natural gas. [District NSR Rule] Federally Enforceable Through Title V Permit
6. 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 Rules 2201]

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Sayed Sadreain, Executive Director / APCO

DAVID WARNER, Director of Permit Services

N-1646-26-2; Jul 28 2006 9:12AM - CHANK Joint Inspection Required with CHANK

Conditions for N-1646-26-2 (continued)

7. The drying oven serving the heatset offset printing press shall be maintained under negative pressure and shall be vented through the thermal incinerator at all times except during periods of start-up while the dryer is being air purged. [District NSR Rule] Federally Enforceable Through Title V Permit
8. The collection system for the dryer exhaust and for all fugitive VOC emissions shall have a minimum capture efficiency of 90%. [District NSR Rule and 4607, 5.5] Federally Enforceable Through Title V Permit
9. The thermal oxidizer shall be operated with a minimum VOC destruction efficiency of 98%. [District Rule 2201]
10. The thermal oxidizer shall be operated at a minimum temp. of 1400 deg. F. The incinerator shall be preheated to 1400 deg. F prior to the start-up of the heatset offset printing operation. [District Rule 2201]
11. The thermal oxidizer shall be equipped with an operational continuous temperature monitoring and recording instrument. [District Rule 2201]
12. Solvents to perform surface preparation or cleanup shall not exceed the VOC content and composite vapor pressure limits of Rule 4607 (Graphic Arts) Table 6. [District Rule 4607]
13. No owner or operator shall use organic solvents for cleaning operations that exceed the VOC content limit specified in Table 6, Rule 4607 (12/20/01 version of Rule 4607). [District Rule 4607]
14. The Volatile Organic Compound (VOC) content of the printing inks as applied (excluding water and exempt compounds) shall be less than 45% by weight and the VOC content of the fountain solutions shall be less than 15% by volume. [District NSR Rule] Federally Enforceable Through Title V Permit
15. For a permittee using any solvent containing more than 50 g/L of VOC for organic solvent cleaning, cleaning activities shall be by one of the following methods: wipe cleaning; application of solvent using nonpropellant-induced, hand-held spray bottles; non-atomized solvent flow method, or solvent flushing method. [District Rule 4607, 5.8.6] Federally Enforceable Through Title V Permit
16. For a permittee using any solvent containing more than 50 g/L 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. [District Rule 4607, 5.8.7] Federally Enforceable Through Title V Permit
17. For a permittee using any solvent containing more than 50 g/L 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 component part(s) being cleaned 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, 5.8.8] Federally Enforceable Through Title V Permit
18. 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, 5.8.9] Federally Enforceable Through Title V Permit
19. VOC emissions from the printing inks and solvents shall not exceed 61.4 pounds in any one day. [District NSR Rule] Federally Enforceable Through Title V Permit
20. The NOx emission concentration from the drying oven shall not exceed 65 ppmv, dry, corrected to 3% oxygen (O2). [District NSR Rule] Federally Enforceable Through Title V Permit
21. The CO emissions rate from the drying oven shall not exceed 0.084 lb/MMBtu. [District Rule] Federally Enforceable Through Title V Permit
22. The PM10 emissions rate from the drying oven shall not exceed 0.0076 lb/MMBtu. [District Rule] Federally Enforceable Through Title V Permit
23. The SOx emissions rate from the drying oven shall not exceed 0.00285 lb/MMBtu. [District Rule] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

Conditions for N-1646-26-2 (continued)

24. The VOC emissions rate from the drying oven shall not exceed 0.0055 lb/MMBtu. [District Rule] Federally Enforceable Through Title V Permit
25. The NOx emission rate from the regenerative thermal oxidizer shall not exceed 0.18 lb/MMBtu. [District Rule 2201]
26. The CO emissions rate from the regenerative thermal oxidizer shall not exceed 0.07 lb/MMBtu. [District Rule 2201]
27. The PM10 emissions rate from the regenerative thermal oxidizer shall not exceed 0.01 lb/MMBtu. [District Rule 2201]
28. The SOx emissions rate from the regenerative thermal oxidizer shall not exceed 0.00285 lbs/MMBtu. [District Rule 2201]
29. The VOC emissions rate from the regenerative thermal oxidizer shall not exceed 0.02 lb/MMBtu. [District Rule 2201]
30. Total VOC emissions from the stationary source (excluding permit unit N-1646-34) shall not exceed 235.6 pounds in any one day. [District Rule 2201]
31. Total NOx emissions from the stationary source (excluding permit unit N-1646-34) shall not exceed 150 pounds in any one day. [District Rule 2201]
32. 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 Rule 2201]
33. Permittee shall maintain a current file of coatings, inks, adhesives, fountain solutions, wash primers, and solvents in use and in storage. 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, density, and composite vapor pressure. [District Rule 4607, 6.1.1] Federally Enforceable Through Title V Permit
34. 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 (12/20/01 version of Rule 4607). [District Rule 4607, 6.1.2.1] Federally Enforceable Through Title V Permit
35. 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, 6.1.2.2] Federally Enforceable Through Title V Permit
36. The permittee shall maintain daily records of the quantity of VOC emitted (in pounds) from the printing press. [District Rules 1070, 4.0 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
37. The permittee shall maintain daily records of the cumulative quantity of VOC emitted (in pounds) from all graphic arts printing operations at the facility. [District Rule 1070 and 2201]
38. A daily log of fuel usage for each drying oven and each thermal oxidizer at the facility shall be maintained on the premises at all times. [District NSR Rule]
39. The permittee shall maintain daily records of the thermal oxidizers operational temperature. [District Rule 2520, 9.3.2 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
40. The permittee shall maintain a record of the cumulative annual quantity of natural gas used (in cubic feet) by the thermal oxidizer under this permit. The cumulative total quantity of natural gas used shall be updated monthly. [District Rule 2201]
41. All records shall be retained for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rules 1070, 4.0, 2520, 9.4.2, and 4607, 6.1.6] Federally Enforceable Through Title V Permit
42. Source testing to demonstrate compliance with the VOC destruction efficiency of the regenerative thermal oxidizer under this permit shall be conducted within 60 days of initial start-up and on an annual basis thereafter. [District Rule 2201]
43. 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, 7.1] Federally Enforceable Through Title V Permit
44. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081, 7.3] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

Conditions for N-1646-26-2 (continued)

45. 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, 6.4.4] Federally Enforceable Through Title V Permit
46. The facility shall submit an application to modify this permit to comply with the requirements of District Rule 4309 in accordance with the timeframes and procedures of District Rule 4309, Section 7.1. [District Rule 4309]
47. Prior to operating the equipment authorized by this Authority to Construct permit, the facility shall submit an application to the District for a modification to the Title V permit in accordance with District Rule 2520, Section 11.4.2. [District Rule 2520]



San Joaquin Valley
Air Pollution Control District

COPY

AUTHORITY TO CONSTRUCT

PERMIT NO: N-1646-36-0

ISSUANCE DATE: 04/28/2005

LEGAL OWNER OR OPERATOR: QUEBECOR WORLD

MAILING ADDRESS: P O BOX 3139
MERCED, CA 95344

LOCATION: 2201 COOPER AVENUE
MERCED, CA

EQUIPMENT DESCRIPTION:

GRAPHIC ARTS PRINTING OPERATION CONSISTING OF ONE MAN ROLAND MODEL ROTOMANS 57.5" WIDE 8-COLOR HEATSET OFFSET LITHOGRAPHIC PRINTING PRESS (PRESS #520) AND TWO 9.9 MMBTU/HR NATURAL GAS FIRED MEGTEC MODEL DD III-135 DRYING OVENS (EACH CONSISTS OF AN 8.4 MMBTU/HR MAXON OVENPAK 400 BURNER AND A 1.5 MMBTU/HR MAXON APX BURNER) SERVED BY THE 9.5 MMBTU/HR MEGTEC ENTERPRISE II OR THE 18 MMBTU/HR REECO RETHERM MODEL E NATURAL GAS FIRED REGENERATIVE THERMAL OXIDIZER

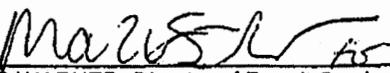
CONDITIONS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
4. 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 NSR Rule]
5. The drying ovens and regenerative thermal oxidizers shall be fired exclusively on natural gas. [District Rule 2201]
6. 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]
7. 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]
8. The collection system for the dryer exhausts and for all fugitive VOC emissions shall have a minimum capture efficiency of 90%. [District Rule 2201]

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

DAVID L. CROW, Executive Director / APCO


DAVID WARNER, Director of Permit Services

N-1646-36-0; Apr 28 2005 11:17AM - CHANK - Joint Inspection NOT Required

Northern Regional Office • 4230 Klernan Avenue, Suite 130 • Modesto, CA 95356-9322 • (209) 557-6400 • Fax (209) 557-6475

9. Each thermal oxidizer shall be operated with a minimum VOC destruction efficiency of 98%. [District Rule 2201]
10. Each thermal oxidizer shall be operated at a minimum temp. of 1400 deg. F. The incinerator shall be preheated to 1400 deg. F prior to the start-up of the heatset offset printing operation. [District Rule 2201]
11. Each thermal oxidizer shall be equipped with an operational continuous temperature monitoring and recording instrument. [District Rule 2201]
12. 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]
13. Solvents to perform surface preparation or cleanup shall not exceed the VOC content and composite vapor pressure limits of Rule 4607 (Graphic Arts) Table 6. [District Rule 4607]
14. No owner or operator shall use organic solvents for cleaning operations that exceed the VOC content limit specified in Table 6, Rule 4607 (12/20/01 version of Rule 4607). [District Rule 4607]
15. For a permittee using any solvent containing more than 50 g/L of VOC for organic solvent cleaning, cleaning activities shall be by one of the following methods: wipe cleaning; application of solvent using nonpropellant-induced, hand-held spray bottles; non-atomized solvent flow method, or solvent flushing method. [District Rule 4607]
16. For a permittee using any solvent containing more than 50 g/L 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. [District Rule 4607]
17. For a permittee using any solvent containing more than 50 g/L 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 component part(s) being cleaned 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]
18. 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]
19. VOC emissions from the printing inks and solvents shall not exceed 50.0 pounds in any one day. [District Rule 2201]
20. The NO_x emission concentration from the Maxon Ovenpak burner in the drying ovens shall not exceed 167 ppmv, dry, corrected to 3% oxygen (O₂). [District Rule 2201]
21. The NO_x emission concentration from the Maxon APX burner in the drying ovens shall not exceed 100 ppmv, dry, corrected to 3% oxygen (O₂). [District Rule 2201]
22. The CO emissions rate from the drying ovens shall not exceed 0.084 lb/MMBtu. [District Rule 2201]
23. The PM₁₀ emissions rate from the drying ovens shall not exceed 0.0076 lb/MMBtu. [District Rule 2201]
24. The SO_x emissions rate from the drying ovens shall not exceed 0.00285 lb/MMBtu. [District Rule 2201]
25. The VOC emissions rate from the drying ovens shall not exceed 0.0055 lb/MMBtu. [District Rule 2201]
26. The NO_x emission rate from the regenerative thermal oxidizers shall not exceed 0.1 lb/MMBtu. [District Rule 2201]
27. The CO emissions rate from the regenerative thermal oxidizers shall not exceed 0.084 lb/MMBtu. [District Rule 2201]
28. The PM₁₀ emissions rate from the regenerative thermal oxidizers shall not exceed 0.0076 lb/MMBtu. [District Rule 2201]
29. The SO_x emissions rate from the regenerative thermal oxidizers shall not exceed 0.00285 lbs/MMBtu. [District Rule 2201]

CONDITIONS CONTINUE ON NEXT PAGE

30. The VOC emissions rate from the regenerative thermal oxidizers shall not exceed 0.0055 lb/MMBtu. [District Rule 2201]
31. Total VOC emissions from the entire stationary source shall not exceed 235.6 pounds in any one day. [District Rule 2201]
32. Total NOx emissions from the entire stationary source shall not exceed 150 pounds in any one day. [District Rule 2201]
33. The total quantity of natural gas used in the drying ovens under this permit shall not exceed 18.7 million cubic feet in any one calendar year. [District Rule 2201]
34. 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 sheets (MSDS) or product data sheets showing the material name, manufacturer's name, VOC content as applied, mixing instruction, density, and composite vapor pressure. [District Rule 4607]
35. 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 2201 & 4607]
36. 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 (12/20/01 version of Rule 4607). [District Rule 4607]
37. 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 each thermal oxidizer. [District Rule 1070]
38. The permittee shall maintain a record of the cumulative annual quantity of natural gas used (in cubic feet) by the drying ovens under this permit. The cumulative total quantity of natural gas used shall be updated monthly. [District Rule 2201]
39. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 4607]
40. 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]
41. 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]
42. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081]
43. 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]
44. Permit to Operate N-1646-17 shall be deleted prior to or at the same time as this Authority to Construct Permit is implemented. [District Rule 2201]
45. Prior to operating the equipment authorized by this Authority to Construct permit, the facility shall submit an application to the District for a modification to the Title V permit in accordance with District Rule 2520, Section 11.4.2. [District Rule 2520]



San Joaquin Valley
Air Pollution Control District

COPY

AUTHORITY TO CONSTRUCT

PERMIT NO: N-1646-38-0

ISSUANCE DATE: 03/14/2006

LEGAL OWNER OR OPERATOR: QUEBECOR WORLD
MAILING ADDRESS: P O BOX 3139
MERCED, CA 95344

LOCATION: 2201 COOPER AVE
MERCED, CA

EQUIPMENT DESCRIPTION:

GRAPHIC ARTS PRINTING OPERATION CONSISTING OF ONE MAN ROLAND MODEL ROTOMAN S 64" WIDE 8-COLOR HEATSET OFFSET LITHOGRAPHIC PRINTING PRESS (PRESS #523) WITH ONE 9.4 MMBTU/HR NATURAL GAS FIRED MEGTEC MODEL DD III-135-2080 DRYING OVEN #1 (WITH MAXON LOW NOX BURNERS) AND ONE 9.0 MMBTU/HR NATURAL GAS FIRED MEGTEC MODEL DD III-135-2080 DRYING OVEN #2 (WITH MAXON LOW NOX BURNERS) EACH SERVED BY THE 9.5 MMBTU/HR MEGTEC ENTERPRISE II OR THE 18 MMBTU/HR REECO RETHERM MODEL E NATURAL GAS FIRED REGENERATIVE THERMAL OXIDIZER

CONDITIONS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
4. 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 NSR Rule]
5. The drying ovens and regenerative thermal oxidizers shall be fired exclusively on natural gas. [District Rule 2201]
6. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of natural gas combusted in each drying oven shall be installed, utilized and maintained. [District Rules 2201]
7. 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]
8. 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]

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Deputy APCO


DAVID WARNER, Director of Permit Services

N-1646-38-0, Mar 14 2006 10:21AM - CHANK - Joint Inspection NOT Required

Northern Regional Office • 4800 Enterprise Way • Modesto, CA 95356-8718 • (209) 557-6400 • Fax (209) 557-6475

Conditions for N-1646-38-0 (continued)

9. The collection system for the dryer exhausts and for all fugitive VOC emissions shall have a minimum capture efficiency of 90%. [District Rule 2201]
10. Each thermal oxidizer shall be operated with a minimum VOC destruction efficiency of 98%. [District Rule 2201]
11. Each thermal oxidizer shall be operated at a minimum temp. of 1400 deg. F. The incinerator shall be preheated to 1400 deg. F prior to the start-up of the heatset offset printing operation. [District Rule 2201]
12. Each thermal oxidizer shall be equipped with an operational continuous temperature monitoring and recording instrument. [District Rule 2201]
13. 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]
14. Solvents to perform surface preparation or cleanup shall not exceed the VOC content and composite vapor pressure limits of Rule 4607 (Graphic Arts) Table 6. [District Rule 4607]
15. No owner or operator shall use organic solvents for cleaning operations that exceed the VOC content limit specified in Table 6, Rule 4607 (12/20/01 version of Rule 4607). [District Rule 4607]
16. For a permittee using any solvent containing more than 50 g/L of VOC for organic solvent cleaning, cleaning activities shall be by one of the following methods: wipe cleaning; application of solvent using nonpropellant-induced, hand-held spray bottles; non-atomized solvent flow method, or solvent flushing method. [District Rule 4607]
17. For a permittee using any solvent containing more than 50 g/L 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. [District Rule 4607]
18. For a permittee using any solvent containing more than 50 g/L 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 component part(s) being cleaned 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]
19. 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]
20. VOC emissions from the printing inks and solvents shall not exceed 50.0 pounds in any one day. [District Rule 2201]
21. The NOx emission concentration from the drying ovens shall not exceed 0.036 lb/MMBtu. [District Rule 2201]
22. The CO emissions rate from the drying ovens shall not exceed 0.276 lb/MMBtu. [District Rule 2201]
23. The PM10 emissions rate from the drying ovens shall not exceed 0.0076 lb/MMBtu. [District Rule 2201]
24. The SOx emissions rate from the drying ovens shall not exceed 0.00285 lb/MMBtu. [District Rule 2201]
25. The VOC emissions rate from the drying ovens shall not exceed 0.0055 lb/MMBtu. [District Rule 2201]
26. The NOx emission rate from the regenerative thermal oxidizers shall not exceed 0.1 lb/MMBtu. [District Rule 2201]
27. The CO emissions rate from the regenerative thermal oxidizers shall not exceed 0.084 lb/MMBtu. [District Rule 2201]
28. The PM10 emissions rate from the regenerative thermal oxidizers shall not exceed 0.0076 lb/MMBtu. [District Rule 2201]
29. The SOx emissions rate from the regenerative thermal oxidizers shall not exceed 0.00285 lbs/MMBtu. [District Rule 2201]
30. The VOC emissions rate from the regenerative thermal oxidizers shall not exceed 0.0055 lb/MMBtu. [District Rule 2201]

CONDITIONS CONTINUE ON NEXT PAGE

Conditions for N-1646-38-0 (continued)

31. Total VOC emissions from the stationary source (excluding permit unit N-1646-34) shall not exceed 235.6 pounds in any one day. [District Rule 2201]
32. Total NOx emissions from the stationary source (excluding permit unit N-1646-34) shall not exceed 150 pounds in any one day. [District Rule 2201]
33. The total quantity of natural gas used in the drying ovens under this permit unit shall not exceed 137,000 cubic feet in any one day. [District Rule 2201]
34. The total quantity of natural gas used in the drying ovens under this permit unit shall not exceed 50.0 million cubic feet in any one calendar year. [District Rule 2201]
35. 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 sheets (MSDS) or product data sheets showing the material name, manufacturer's name, VOC content as applied, mixing instruction, density, and composite vapor pressure. [District Rule 4607]
36. 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 2201 & 4607]
37. 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 (12/20/01 version of Rule 4607). [District Rule 4607]
38. 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 each thermal oxidizer. [District Rule 1070]
39. The permittee shall maintain a record of the cumulative annual quantity of natural gas used (in cubic feet) by the drying ovens under this permit. The cumulative total quantity of natural gas used shall be updated monthly. [District Rule 2201]
40. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 4607]
41. 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]
42. 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]
43. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081]
44. 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]
45. The facility shall submit an application to modify this permit to comply with the requirements of District Rule 4309 in accordance with the timeframes and procedures of District Rule 4309, Section 7.1. [District Rule 4309]
46. Prior to operating the equipment authorized by this Authority to Construct permit, the facility shall submit an application to the District for a modification to the Title V permit in accordance with District Rule 2520, Section 11.4.2. [District Rule 2520]

APPENDIX C

Emissions Increases

Permit Number	SSIPE (lb/yr)				
	NOx	VOC	CO	SOx	PM10
N-1646-15-5	0	0	0	0	0
N-1646-26-5	0	0	0	0	0
N-1646-36-2	0	0	549	20	69
N-1646-38-2	0	0	4,200	143	380
TOTAL	0	0	4,749	163	449

APPENDIX D

Applications

San Joaquin Valley Air Pollution Control District

www.valleyair.org

Permit Application For:

ADMINISTRATIVE AMENDMENT MINOR MODIFICATION SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: <p style="text-align: center;">QUEBECOR WORLD</p>	
2. MAILING ADDRESS: STREET/P.O. BOX: <u>2201 COOPER AVENUE</u> CITY: <u>MERCED</u> STATE: <u>CALIFORNIA</u> 9-DIGIT <u>95348-</u> ZIP CODE: <u>4307</u>	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: <u>2201 COOPER AVENUE</u> CITY: <u>MERCED</u> _____% SECTION _____ TOWNSHIP _____ RANGE _____	INSTALLATION DATE: <p style="text-align: center;">APRIL, 2007</p>
4. GENERAL NATURE OF BUSINESS: <p style="text-align: center;">COMMERCIAL PRINTING</p>	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) PERMIT # N-1646-15-3 MODIFICATION OF THE GRAFFIC ARTS PRINTING OPERATION CONSISTING OF A MODEL 45.5" X 77" MAXINOVA FLEXOGRAPHIC PRINTING PRESS #505 TO REMOVE THE PERMIT CONDITION LIMITING THE USE OF INKS BETWEEN PRINTING PRESSES #505 AND #506 TO NOT EXCEED 6,100 LB/DAY. PRESS #506 (PERMIT # 1646-18-0) HAS BEEN REMOVED FROM THE FACILITY AND PRESS #505 WIL BE THE ONLY PRESS LIMITED TO 6,100 LB/DAY.	
6. TYPE OR PRINT NAME OF APPLICANT: <p style="text-align: center;">ROGER A. ASHLOCK</p>	TITLE OF APPLICANT: <p style="text-align: center;">ENVIRONMENTAL COORDINATOR</p>
7. SIGNATURE OF APPLICANT: 	DATE: <u>8-14-2008</u> PHONE: (209) 384 - 0444 FAX: (209) 384 - 2680 EMAIL: roger.ashlock@quebecorworld.com

~~For APCD-Use Only~~

<p>RECEIVED</p> <p>DATE STAMP <u>AUG 18 2008</u></p> <p>SJVAPCD NORTHERN REGION</p>	<p>FILING FEE RECEIVED: <u>\$ 136.00</u> CHECK#: <u>101650321069</u></p> <p>DATE PAID: <u>8/15/08</u></p> <p>PROJECT NO: <u>01083282</u> FACILITY ID: <u>011646</u></p>
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San Joaquin Valley Air Pollution Control District

www.valleyair.org

Permit Application For:

ADMINISTRATIVE AMENDMENT MINOR MODIFICATION SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: <p style="text-align: center;">QUEBECOR WORLD</p>	
2. MAILING ADDRESS: STREET/P.O. BOX: <u>2201 COOPER AVENUE</u> CITY: <u>MERCED</u> STATE: <u>CALIFORNIA</u> 9-DIGIT <u>95348-</u> ZIP CODE: <u>4307</u>	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: <u>2201 COOPER AVENUE</u> CITY: <u>MERCED</u> _____% SECTION _____ TOWNSHIP _____ RANGE _____	INSTALLATION DATE: <p style="text-align: center;">SEPTEMBER , 2006</p>
4. GENERAL NATURE OF BUSINESS: <p style="text-align: center;">COMMERCIAL PRINTING</p>	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) PERMIT # N-1646-26-2 MODIFICATION OF THE GRAFFIC ARTS PRINTING OPERATION CONSISTING OF A GOSS GRAPHICS SYSTEME INC. MODEL C-700-E HEATSET OFFSET LITHOGRAIPHC PRINTING PRESS (PRESS #531) SERVED BY A 10.5 MMBTU/HR NATURAL GAS FIRED MODEL DUEL DRY - III 119 DRYING OVEN TO VENT THE DRYING OVEN TO THE SHARED 5.75 MMBTU/HR MEGTEC CLEANSWITCH MODEL CS-300-95 NATURAL GAS FIRED REGENERATIVE THERMAL OXIDIZER.	
6. TYPE OR PRINT NAME OF APPLICANT: ROGER A. ASHLOCK	TITLE OF APPLICANT: ENVIRONMENTAL COORDINATOR
7. SIGNATURE OF APPLICANT: <i>Roger A. Ashlock</i>	DATE: <u>8-14-2008</u> PHONE: (209) 384 - 0444 FAX: (209) 384 - 2680 EMAIL: roger.ashlock@quebecorworld.com

For APCD Use Only:

DATE STAMP <p style="text-align: center;">RECEIVED</p> <p style="text-align: center;">AUG 18 2008</p> <p style="text-align: center;">SJVAPCD NORTHERN REGION</p>	FILING FEE RECEIVED: <u>\$ 136.⁰⁰</u>	CHECK#: <u>101650321069</u>	
	DATE PAID: <u>8-15-08</u>	PROJECT NO: <u>01083282</u>	FACILITY ID: <u>011646</u>

San Joaquin Valley Air Pollution Control District

www.valleyair.org

Permit Application For:

ADMINISTRATIVE AMENDMENT MINOR MODIFICATION SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: QUEBECOR WORLD	
2. MAILING ADDRESS: STREET/P.O. BOX: <u>2201 COOPER AVENUE.</u> CITY: <u>MERCED</u> STATE: <u>CALIFORNIA</u> 9-DIGIT <u>95348-</u> ZIP CODE: <u>4307</u>	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: <u>2201 COOPER AVENUE</u> CITY: <u>MERCED</u> 1/4 SECTION _____ TOWNSHIP _____ RANGE _____	INSTALLATION DATE: SEPTEMBER, 2005
4. GENERAL NATURE OF BUSINESS: COMMERCIAL PRINTING	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) PERMIT NO. N-1646-36-0 GRAPHIC ARTS PRINTING OPERATION CONSISTING OF ONE MAN ROLAND MODEL ROTOMAN - S 57.5" WIDE 8-COLOR HEATSET OFFSET LITHOGRAPHIC PRINTING PRESS (PRESS #520) WITH TWO 9.9 MMBTU/HR NATURAL GAS FIRED MEGTEC MODEL DD 111-135 DRYING OVENS (EACH CONSIST OF AN 8.4 MMBTU/HR MAXONOVENPAK 400 BURNER AND A 1.5 MMBTU/HR MAXON APX BURNER) EACH SERVED BY THE 9.5 MMBTU/HR MEGTEC ENTERPRISE II OR THE 18 MMBTU/HR REECO RETHERM MODEL - E NATURAL GAS FIRED REGENERATIVE THERMAL OXIDIZER.	
6. TYPE OR PRINT NAME OF APPLICANT: ROGER A. ASHLOCK	TITLE OF APPLICANT: ENVIRONMENTAL COORDINATOR
7. SIGNATURE OF APPLICANT: 	DATE: 8-14-2008 PHONE: (209) 384 - 0444 FAX: (209) 384 - 2680 EMAIL: roger.ashlock@quebecorworld.com

San Joaquin Valley Air Pollution Control District

www.valleyair.org

Permit Application For:

ADMINISTRATIVE AMENDMENT MINOR MODIFICATION SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: <p style="text-align: center;">QUEBECOR WORLD</p>	
2. MAILING ADDRESS: STREET/P.O. BOX: <u>2201 COOPER AVENUE.</u> CITY: <u>MERCED</u> STATE: <u>CALIFORNIA</u> 9-DIGIT: <u>95348-</u> ZIP CODE: <u>4307</u>	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: <u>2201 COOPER AVENUE</u> CITY: <u>MERCED</u> _____% SECTION _____ TOWNSHIP _____ RANGE _____	INSTALLATION DATE: <p style="text-align: center;">SEPTEMBER, 2006</p>
4. GENERAL NATURE OF BUSINESS: <p style="text-align: center;">COMMERCIAL PRINTING</p>	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) PERMIT NO. N-1646-38-0 GRAPHIC ARTS PRINTING OPERATION CONSISTING OF ONE MAN ROLAND MODEL ROTOMAN - S 64" WIDE 8-COLOR HEATSET OFFSET LITHOGRAPHIC PRINTING PRESS (PRESS #523) WITH ONE 9.4 MMBTU/HR NATURAL GAS FIRED MEGTEC MODEL DD 111-135-2080 DRYING OVEN #2 (WITH MAXON LOW NOX BURNERS) EACH SERVED BY THE 9.5 MMBTU/HR MEGTEC ENTERPRISE II OR THE 18 MMBTU/HR REECO RETHERM MODEL E NATURALGAS FIRED REGENERATIVE THERMAL OXIDIZER.	
6. TYPE OR PRINT NAME OF APPLICANT: ROGER A. ASHLOCK	TITLE OF APPLICANT: ENVIRONMENTAL COORDINATOR
7. SIGNATURE OF APPLICANT: <i>Roger A. Ashlock</i>	DATE: <i>8-14-2008</i> PHONE: (209) 384 - 0444 FAX: (209) 384 - 2680 EMAIL: roger.ashlock@quebecorworld.com

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San Joaquin Valley
Unified Air Pollution Control District

SJVAPCD
NORTHERN REGION

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

SIGNIFICANT PERMIT MODIFICATION
 MINOR PERMIT MODIFICATION

ADMINISTRATIVE
AMENDMENT

COMPANY NAME: <u>Quebecor World - Merced</u>	FACILITY ID: <u>N-1646</u>
1. Type of Organization: <input type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name: <u>Quebecor World</u>	
3. Agent to the Owner:	

II. COMPLIANCE CERTIFICATION (Read each statement carefully and initial all circles for confirmation):

- Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).
- Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.
- Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
- Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:

Pat Frey
Signature of Responsible Official

2-5-2009
Date

PATRICK FREY
Name of Responsible Official (please print)

ENVIRONMENTAL COORDINATOR
Title of Responsible Official (please print)

**San Joaquin Valley
Unified Air Pollution Control District**

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

- SIGNIFICANT PERMIT MODIFICATION ADMINISTRATIVE
 MINOR PERMIT MODIFICATION AMENDMENT

COMPANY NAME: QUEBECOR WORLD - MERCED	FACILITY ID: N-1646
1. Type of Organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name: QUEBECOR WORLD	
3. Agent to the Owner:	

II. COMPLIANCE CERTIFICATION (Read each statement carefully and initial all circles for confirmation):

- Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).
- Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.
- Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
- Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:

Roger A. Ashlock
Signature of Responsible Official

October 28, 2007
Date

Roger Ashlock
Name of Responsible Official (please print)

Environmental Coordinator
Title of Responsible Official (please print)

APPENDIX E

Previous Title V Operating Permits No.
N-1646-15-2 and -26-1

&

Facility-Wide Title V Operating Permit No.
N-1646-0-1

San Joaquin Valley
Air Pollution Control District

COPY

PERMIT UNIT: N-1646-15-2

EXPIRATION DATE: 09/30/2008

EQUIPMENT DESCRIPTION:

FLEXOGRAPHIC PRINTING PRESS #505: CERUTTI FLEXOGRAPHIC PRINTING PRESS

PERMIT UNIT REQUIREMENTS

1. The total amount of flexographic inks used at flexo printing presses #505 and #506 shall not exceed 6,100 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
2. For flexographic printing operations, use of specialty inks, as defined in Rule 4607, shall not exceed two gallons in a calendar day and 120 gallons in a calendar year. [District Rule 4607, 5.2] Federally Enforceable Through Title V Permit
3. For flexographic printing operations, VOC content of graphic arts materials shall not exceed any of the following limits: ink: 300 g/l (2.5 lb/gal), coating: 300 g/l (2.5 lb/gal), adhesive: 150 g/l (1.25 lb/gal), metallic ink: 485 g/l (4.1 lb/gal), matte finish ink: 535 g/l (4.5 lb/gal), web splicing adhesive: 300 g/l (2.5 lb/gal). [District Rule 4607, 5.1] Federally Enforceable Through Title V Permit
4. VOC content of the flexographic inks shall comply with Rule 4607 for low VOC inks. [District Rule 4607] Federally Enforceable Through Title V Permit
5. Water and non-VOC emitting soaps shall be used for cleanup. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Solvents to perform surface preparation or cleanup shall not exceed the VOC content and composite vapor pressure limits of Rule 4607 (Graphic Arts) Table 6. [District Rule 4607, 5.8.3] Federally Enforceable Through Title V Permit
7. No owner or operator shall use organic solvents for cleaning operations that exceed the VOC content limit specified in Table 6, Rule 4607 (12/20/01 version of Rule 4607). [District Rule 4607, 5.8.3] Federally Enforceable Through Title V Permit
8. For a permittee using any solvent containing more than 50 g/L of VOC for organic solvent cleaning, cleaning activities shall be by one of the following methods: wipe cleaning; application of solvent using nonpropellant-induced, hand-held spray bottles; non-atomized solvent flow method, or solvent flushing method. [District Rule 4607, 5.8.6] Federally Enforceable Through Title V Permit
9. For a permittee using any solvent containing more than 50 g/L 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. [District Rule 4607, 5.8.7] Federally Enforceable Through Title V Permit
10. For a permittee using any solvent containing more than 50 g/L 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 component part(s) being cleaned 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, 5.8.8] 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.

11. 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, 5.8.9] Federally Enforceable Through Title V Permit
12. Permittee shall maintain a current file of coatings, inks, adhesives, fountain solutions, wash primers, and solvents in use and in storage. 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, density, and composite vapor pressure. [District Rule 4607, 6.1.1] Federally Enforceable Through Title V Permit
13. 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, 6.1.2.2] Federally Enforceable Through Title V Permit
14. 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 (12/20/01 version of Rule 4607). [District Rule 4607, 6.1.2.1] Federally Enforceable Through Title V Permit
15. All records shall be retained for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rules 1070, 4.0, 2520, 9.4.2, and 4607, 6.1.6] Federally Enforceable Through Title V Permit

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

San Joaquin Valley
Air Pollution Control District

COPY

PERMIT UNIT: N-1646-26-1

EXPIRATION DATE: 09/30/2008

EQUIPMENT DESCRIPTION:

GRAPHIC ARTS PRINTING OPERATION CONSISTING OF ONE (1) GOSS GRAPHICS SYSTEMS, INC. MODEL C700-E HEATSET OFFSET LITHOGRAPHIC PRINTING PRESS (PRESS #531) AND ONE (1) 10.5 MMBTU/HR NATURAL GAS FIRED MEGTEC MODEL DUAL DRY III 119 DRYING OVEN SERVED BY THE 9.5 MMBTU/HR MEGTEC ENTERPRISE II OR THE 18 MMBTU/HR REECO RETHERM MODEL E NATURAL GAS FIRED REGENERATIVE THERMAL OXIDIZERS

PERMIT UNIT REQUIREMENTS

1. The drying oven and regenerative thermal oxidizers shall be fired exclusively on natural gas. [District NSR Rule] Federally Enforceable Through Title V Permit
2. The drying oven serving the heatset offset printing press shall be maintained under negative pressure and shall be vented through the thermal incinerator at all times except during periods of start-up while the dryer is being air purged. [District NSR Rule] Federally Enforceable Through Title V Permit
3. The collection system for the dryer exhaust and for all fugitive VOC emissions shall have a minimum capture efficiency of 90%. [District NSR Rule and 4607, 5.5] Federally Enforceable Through Title V Permit
4. Each thermal incinerator shall be operated with a minimum VOC destruction efficiency of 98%. [District NSR Rule and 4607, 5.5] Federally Enforceable Through Title V Permit
5. Each thermal oxidizer shall be operated at a minimum temp. of 1400 deg. F. The incinerator shall be preheated to 1400 deg. F prior to the start-up of the heatset offset printing operation. [District NSR Rule, 2520, 9.3.2, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
6. Each thermal incinerator shall be equipped with a continuous temperature monitoring and recording instrument. [District NSR Rule, 2520, 9.3.2, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
7. For a permittee using any solvent containing more than 50 g/L of VOC for organic solvent cleaning, cleaning activities shall be by one of the following methods: wipe cleaning; application of solvent using nonpropellant-induced, hand-held spray bottles; non-atomized solvent flow method, or solvent flushing method. [District Rule 4607, 5.8.6] Federally Enforceable Through Title V Permit
8. For a permittee using any solvent containing more than 50 g/L 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. [District Rule 4607, 5.8.7] Federally Enforceable Through Title V Permit
9. For a permittee using any solvent containing more than 50 g/L 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 component part(s) being cleaned 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, 5.8.8] 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. 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, 5.8.9] Federally Enforceable Through Title V Permit
11. Permittee shall maintain a current file of coatings, inks, adhesives, fountain solutions, wash primers, and solvents in use and in storage. 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, density, and composite vapor pressure. [District Rule 4607, 6.1.1] Federally Enforceable Through Title V Permit
12. The Volatile Organic Compound (VOC) content of the printing inks as applied (excluding water and exempt compounds) shall be less than 45% by weight and the VOC content of the fountain solutions shall be less than 15% by volume. [District NSR Rule] Federally Enforceable Through Title V Permit
13. VOC emissions from the printing inks and solvents shall not exceed 61.4 pounds in any one day. [District NSR Rule] Federally Enforceable Through Title V Permit
14. The NOx emission concentration from the drying oven shall not exceed 65 ppmv, dry, corrected to 3% oxygen (O2). [District NSR Rule] Federally Enforceable Through Title V Permit
15. Emissions from the drying oven shall not exceed any of the following limits: 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 0.084 lb-CO/MMBtu, or 0.0055 lb-VOC/MMBtu. [District NSR Rule] Federally Enforceable Through Title V Permit
16. Emissions from the regenerative thermal oxidizers shall not exceed any of the following limits: 0.1 lb-NOx/MMBtu, 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 0.084 lb-CO/MMBtu, or 0.0055 lb-VOC/MMBtu. [District NSR Rule] Federally Enforceable Through Title V Permit
17. 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 (12/20/01 version of Rule 4607). [District Rule 4607, 6.1.2.1] Federally Enforceable Through Title V Permit
18. 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, 6.1.2.2] Federally Enforceable Through Title V Permit
19. The permittee shall maintain daily records of the quantity of VOC emitted (in pounds) from the printing press. [District Rules 1070, 4.0 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
20. A daily log of fuel usage for each drying oven and each thermal oxidizer shall be maintained on the premises at all times. [District NSR Rule] Federally Enforceable Through Title V Permit
21. The permittee shall maintain daily records of the thermal oxidizers operational temperature. [District Rule 2520, 9.3.2 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
22. All records shall be retained for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rules 1070, 4.0, 2520, 9.4.2, and 4607, 6.1.6] Federally Enforceable Through Title V Permit
23. Source testing to demonstrate compliance with the VOC destruction efficiency of each regenerative thermal oxidizer shall be conducted on an annual basis. [District NSR Rule] Federally Enforceable Through Title V Permit
24. 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, 7.1] Federally Enforceable Through Title V Permit
25. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081, 7.3] Federally Enforceable Through Title V Permit
26. 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, 6.4.4] 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.

27. Each 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, 9.3.2 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
28. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR part 64.7. [40 CFR part 64]
29. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR part 64.9. [40 CFR part 64]
30. 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]

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

San Joaquin Valley
Air Pollution Control District

COPY

FACILITY: N-1646-0-1

EXPIRATION DATE: 09/30/2008

FACILITY-WIDE REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
3. Total Volatile Organic Compound (VOC) emissions from the entire stationary source (excluding permit unit N-1646-34) shall not exceed 235.6 pounds in any single day. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Total NOx emissions from the entire stationary source shall not exceed 150 pounds during any one day. A daily log of fuel usage for each dryer and for the incinerator shall be maintained on the premises. [District NSR Rule] Federally Enforceable Through Title V Permit
5. The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
6. The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
7. The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0] Federally Enforceable Through Title V Permit
8. Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (3/21/02). [District Rule 2010, 3.0 and 4.0; and 2020] Federally Enforceable Through Title V Permit
9. The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 7.0; 2080; and 2520, 9.8.1 and 9.12.1] Federally Enforceable Through Title V Permit
10. A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District. [District Rule 2031] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate. Any amendments to these Facility-wide Requirements that affect specific Permit Units may constitute modification of those Permit Units.

Facility Name: QUEBECOR WORLD
Location: 2201 COOPER AVE, MERCED, CA
N-1646-0-1: Feb 20 2009 4:19PM - CHANK

11. Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District. [District Rule 2040] Federally Enforceable Through Title V Permit
12. The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit
13. The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
14. The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.5.1] Federally Enforceable Through Title V Permit
15. Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520 (6/21/01). [District Rules 2520, 9.5.2 and 1100, 7.0] Federally Enforceable Through Title V Permit
16. If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.7] Federally Enforceable Through Title V Permit
17. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520, 9.8.2] Federally Enforceable Through Title V Permit
18. The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.8.3] Federally Enforceable Through Title V Permit
19. The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.8.4] Federally Enforceable Through Title V Permit
20. The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520, 9.8.5] Federally Enforceable Through Title V Permit
21. The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.9] Federally Enforceable Through Title V Permit
22. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520, 9.13.2.1] Federally Enforceable Through Title V Permit
23. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.13.2.2] Federally Enforceable Through Title V Permit

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

24. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520, 9.13.2.3] Federally Enforceable Through Title V Permit
25. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520, 9.13.2.4] Federally Enforceable Through Title V Permit
26. No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (11/15/01). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101, and County Rules 401 (in all eight counties in the San Joaquin Valley)] Federally Enforceable Through Title V Permit
27. No person shall manufacture, blend, repackage, supply, sell, solicit or apply any architectural coating with a VOC content in excess of the corresponding limit specified in the Table of Standards of District Rule 4601 (10/31/01) for use or sale within the District. [District Rule 4601, 5.1] Federally Enforceable Through Title V Permit
28. All VOC-containing materials for architectural coatings subject to Rule 4601 (10/31/01) shall be stored in closed containers when not in use. [District Rule 4601, 5.4] Federally Enforceable Through Title V Permit
29. The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.3 (10/31/01). [District Rule 4601, 6.1 and 6.3] Federally Enforceable Through Title V Permit
30. With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.13.1 and 10.0] Federally Enforceable Through Title V Permit
31. If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit
32. If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR 82, Subpart B. [40 CFR 82, Subpart B] Federally Enforceable Through Title V Permit
33. Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8021 and 8011] Federally Enforceable Through Title V Permit
34. Outdoor handling, storage and transport of any bulk material which emits dust shall comply with the requirements of District Rule 8031, unless specifically exempted under Section 4.0 of Rule 8031 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8031 and 8011] Federally Enforceable Through Title V Permit
35. An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8041 and 8011] Federally Enforceable Through Title V Permit
36. Whenever open areas are disturbed or vehicles are used in open areas, the facility shall comply with the requirements of Section 5.0 of District Rule 8051, unless specifically exempted under Section 4.0 of Rule 8051 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8051 and 8011] Federally Enforceable Through Title V Permit
37. Any paved road or unpaved road shall comply with the requirements of District Rule 8061 unless specifically exempted under Section 4.0 of Rule 8061 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8061 and Rule 8011] Federally Enforceable Through Title V Permit

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

38. Any unpaved vehicle/equipment area that anticipates more than 75 vehicle trips per day shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 100 vehicle trips per day shall comply with the requirements of Section 5.1.2 of District Rule 8071. All sources shall comply with the requirements of Section 5.0 of District Rule 8071 unless specifically exempted under Section 4.0 of Rule 8071 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8071 and Rule 8011] Federally Enforceable Through Title V Permit
39. Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation). [40 CFR 61 Subpart M] Federally Enforceable Through Title V Permit
40. The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit
41. The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V Permit
42. When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit
43. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following outdated SIP requirements: Rule 401 (Madera, Fresno, Kern, Kings, San Joaquin, Stanislaus, Tulare and Merced), Rule 110 (Fresno, Stanislaus, San Joaquin), Rule 109 (Merced), Rule 113 (Madera), and Rule 111 (Kern, Tulare, Kings). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
44. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2040 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (11/15/01); 4601, sections 5.1, 5.2, 5.3, 5.8 and 8.0 (10/31/01); 8021 (11/15/01); 8031 (11/15/01); 8041 (11/15/01); 8051 (11/15/01); 8061 (11/15/01); and 8071 (11/15/01). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
45. On July 26, 2004, the initial Title V permit was issued. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report are based upon this initial permit issuance date, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days after the end of the reporting period. [District Rule 2520] Federally Enforceable Through Title V Permit

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