



DEC 17 2009

Gerardo C. Rios, Chief
Permits Office (AIR-3)
U.S. EPA - Region IX
75 Hawthorne St
San Francisco, CA 94105

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

Dear Mr. Rios:

The Air Pollution Control Officer has modified the Title V permit for Quebecor World by incorporating Authority to Construct permits N-1646-15-3, '-26-2, '-36-0, and '-38-0. 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 modified Title V permit. The application and proposal were sent to US EPA Region IX on November 2, 2009. No comments were received following the District's preliminary decision on this project.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Rupi Gill, Permit Services Manager, 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)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: 661-392-5500 FAX: 661-392-5585



DEC 17 2009

Roger Ashlock
Quebecor World
2201 Cooper Avenue
Merced, CA 95348

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

Dear Mr. Ashlock:

The Air Pollution Control Officer has modified the Title V permit for Quebecor World by incorporating Authority to Construct permits N-1646-15-3, '-26-2, '-36-0, and '-38-0. 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 modified Title V permit. The application and proposal were sent to US EPA Region IX on November 2, 2009. No comments were received following the District's preliminary decision on this project.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Rupi Gill, Permit Services Manager, 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)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: 661-392-5500 FAX: 661-392-5585

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" MAXINOVA (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.

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 SO_x 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.

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.

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.