

UBS Printing Group, Inc.
2577 Research Dr.
Corona, CA 91720
ID: 119939

EQUIPMENT DESCRIPTION

A/N 476773

LITHOGRAPHIC PRINTING PRESS, KBA PLANETA, MODEL NO. RAPIDA RA105-8+L CXPWVA ALV3, SERIAL NO. 365626, 8 COLOR+COATER, 41", SHEETFED, WITH ONE 284 KW INFRARED DRYER.

A/N 476774: Title V Permit Revision application

BACKGROUND

UBS Printing Group Inc., previously United Rubidoux Inc. (name change only), submitted application no. 476773 to permit a lithographic printing press that is a functionally identical replacement with no emission increase to an existing lithographic printing press that is permitted under p/n F71362, a/n 435036. The new press will be used as the one that it replaces, that is, for commercial printing of reports, inserts, brochures, calendars, labels and other miscellaneous items. The new press will operate under the existing facility-wide VOC emission cap of 2,040 lb/mon.

UBS Printing Group is a Title V facility. An initial Title V permit was issued to this facility on July 26, 2005. UBS Printing Group has proposed to revise their Title V permit by adding a lithographic printing press to replace an existing lithographic printing press. In addition, the applicant requested to change the name of the company from United Rubidoux, Inc, dba UBS Printing group to UBS Printing Group, Inc. This is a name change only and not a change of ownership. This permit revision is considered as an "administrative/minor permit revision" to their Title V permit, as described in the Regulation XXX evaluation.

PROCESS DESCRIPTION

UBS Printing Group prints reports, inserts, brochures, calendars, labels and other printed items using lithographic printing presses. They operate three permitted lithographic presses and two Rule 219 exempt presses. The facility operates 16-24 hr/day, 5-7 days/wk and 52 wks/yr.

UBS Printing Group has not been issued any Notices to Comply or Notices of Violations. Additionally, no citizen complaints have ever been filed on this facility.

EMISSION ESTIMATES

The proposed lithographic printing press will be used to replace an existing lithographic printing press and will operate under the existing facility-wide VOC emission cap of 2,040 lb/month. No increase in VOC emissions is expected.

UBS Printing Group will use a variety of materials in the new press. All materials are compliant with Rules 1130 and 1171. The VOC emissions from the use of all materials from the proposed press are estimated to be 55 lb/day, same as current emissions. The materials are tabulated as follows:

Material	Density (lb/gal)	VOC Content (lb/gal)	Rule Limit (lb/gal)	Max Usage (gal/day)	Max Emissions (lb/day)
Flint Process Inks	8.93	0.5	2.5 (Rule 1130)	56	1.4*
Flint UV Inks	9.97	0.135	2.5 (Rule 1130)	15	2.0
C&A 1423	8.8	0.136	2.5 (Rule 1130)	45	6.1
E-Cure UV coating	9.35	0.468	2.5 (Rule 1130)	21	9.8
Fuji Pressmax Ftn. Soln.	8.68	4.78	2.5 (Rule 1130)	2.5	12.0
Alpha 8 wash	8.6	0.8	0.83 (Rule 1171)	8	6.4
APO UV wash	7.26	3.63	4.2 (Rule 1171)	3	10.9
Ammonia	8.65	0	-	0.5	0
EPS Roller Cleaner	8.5	0.83	0.83 (Rule 1171)	2	1.7
Allied Blanket Cond.	7.26	7.2	(Not Rule 1171)	0.5	3.6
Allied Decontaminate	8.26	0.66	0.83 (Rule 1171)	0.5	0.3
Allied Dynaklean	8.09	0.8	0.83 (Rule 1171)	0.5	0.4
Total					54.6

*Ink adsorption 95%

Fountain solution mixture VOC lb/gal as applied = 0.435

Fountain solution mixture volume VOC % as applied = 5.01%

Composite Partial Pressures (mmHg):

Alpha 8 wash = 0.5

APO UV wash = 8.0

EPS roller cleaner = 1.0

Allied Decontaminate = 3

Allied Dynaklean = 3

Daily VOC emissions = 55 lb/day (applicant's estimate)

Hourly VOC emissions = $55 \div 24$ hr/day = 2.29 lb/hr

RISK ASSESSMENT

The proposed printing press will be used to replace the existing press without resulting in any increase in emissions. As a result, the proposed project is exempt from the risk assessment

APPLICATION PROCESSING AND CALCULATION

requirements pursuant to Rule 1401 (g)(1)(C). The following risk assessment calculations are performed only for informational purposes.

Materials used in the printing presses contain a few Rule 1401 toxic air contaminants. The following table list those materials and corresponding TACs. Estimated emissions are based on the maximum amount of TAC in any material. Based on a VOC emission level of 55 lb/day for the proposed project, there will not be a cancer risk equal or greater than one in a million and there will not be a health hazard risk. All estimated emissions are below Tier 1 Screening Emission Levels at the closest receptor distance.

Material	TAC	Wt. Percent (%)	Emissions (lb/gal)	Max. Usage (gal/day)	Emissions (lb/day)	Emissions (lb/hr)	Emissions (lb/yr)
Ammonia	Ammonia	100	8.65	0.5	4.3	0.18	1,570
C&A 1423	Ammonia*	2.8	0.23	45	10.0	0.41	3,860
APO UV wash	Xylene	7	0.51	3	1.5	0.06	548
APO UV wash	Butyl cellosolve	40	2.9	3	8.7	0.36	3,176
Allied Blanket Cond.	Xylene	7	0.51	0.5	0.3	0.01	110
Allied Decontaminate	IPA	8	0.66	0.5	0.3	0.01	110
Allied Dynaklean	Xylene	7	0.57	0.5	0.3	0.01	110

*As part of ammonium hydroxide

TAC	Max Emissions (lb/day)	Max Emissions (lb/hr)	Max Emissions (lb/yr)	Tier 1 Level (lb/yr)	Tier 1 Level (lb/hr)
Ammonia	14.3	0.59	5,430	6,610	1.6
Xylene	2.1	0.08	767	23,100	11
IPA	0.3	0.01	110	231,000	1.6
Butyl cellosolve	8.7	0.36	3,176	-	7.0

RULE ANALYSIS

RULE 212: Public notification is not required since the proposed project is a functional identical replacement of an existing lithographic printing press with no emission increase. Additionally, the proposed project will not cause a cancer risk equal or greater than one in a million and the facility is not located within 1,000 feet of a school.

RULE 401: Visible emissions are not expected with the proper operation of this equipment.

RULE 402: Operation of this equipment is not expected to create a nuisance.

RULE 1130: The VOC content of the inks and coatings range from 0.135 - 0.5 lb/gal, less water and exempt compounds, below the rule limit of 2.5 lb/gal, less water and exempt compounds. The VOC content of the fountain solution is 0.435 lb/gal, below the limit of 0.66 lb/gal. Compliance with this rule is achieved.

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RULE 1171: UBS Printing Group will use cleaners that comply with the VOC limits of this rule. The VOC content of the blanket/roller washes are below 0.83 lb/gal and the UV/EB cleaners are below the 4.2 lb/gal limit. Compliance with this rule is achieved.

REG. XIII

1303(a): BACT for lithographic printing presses is the use of fountain solutions that are 8% VOC by volume or less and blanket/roller washes that have a composite partial pressure of 10 mm Hg or less. UBS Printing Group uses a fountain solution that meets both of these requirements. Compliance with applicable BACT requirements is achieved.

1303(b)(1): The proposed project is exempt from modeling since it is a functionally identical replacement with no emission increase.

1303(b)(2): The proposed project is exempt from offsets since it is a functionally identical replacement with no emission increase.

1303(b)(4): The facility is expected to be in full compliance with all applicable rules and regulations of the District.

RULE 1401: The proposed project is a functional identical replacement with no emission increase and therefore is exempt from the requirements of this rule pursuant to Rule 1401 (g)(1)(C). For background information, a few toxic air contaminant emissions will be emitted from operating the press. Expected emissions do not exceed Tier 1 Screening Emission Levels. There will not be a cancer risk equal or greater than one in a million or a health hazard risk from operating the press as intended. Compliance is expected.

REGULATION XXX:

The replacement of the printing press is considered as a “minor permit revision” pursuant to Rule 3000(b)(12)(A)(vi) since the proposed project does not result in an increase in emissions of a pollutant subject to Regulation XIII - New Source Review or a hazardous air pollutant. The request to for change of name from United Rubidoux, Inc, dba UBS Printing Group to UBS Printing Group, Inc is considered an “administrative permit revision” to the Title V permit.

Rule 3003(j) specifies that for minor permit revision, the proposed Title V permit revisions shall be submitted to EPA for review. This is the second permit revision requested by the facility. The cumulative emission increases resulting from all permit revisions are summarized as follows:

Revision	HAP	VOC	NO _x	PM ₁₀	SO _x	CO
2 nd Permit Revision, add lithographic printing press	0	0	0	0	0	0
Cumulative Total	0	0	0	0	0	0

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Maximum Daily	30	30	40	30	60	220
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PERMIT SHIELD EVALUATION

A permit shield from Rule 1128 was previously approved for the existing press. The new press will also have the same shield since the same shield requirement applies to the new press.

RECOMMENDATION:

The proposed project is expected to comply with all applicable District Rules and Regulations.

Since the proposed project is considered as an “administrative/minor permit revision”, it is exempt from the public participation requirements under Rule 3006 (b). A proposed permit incorporating this permit revision will be submitted to EPA for a 45-day review pursuant to Rule 3003(j). If EPA does not have any objections within the review period, a revised Title V permit will be issued to this facility.