



MAY 2 2013

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-1103547

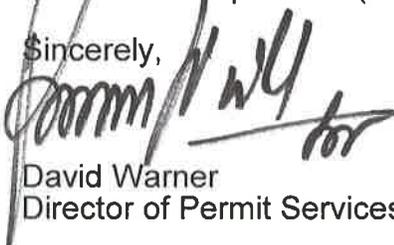
Dear Mr. Rios:

Enclosed for you to review is an application for minor Title V permit modification for the facility identified above. QG, LLC is proposing a Title V minor permit modification to incorporate the recently issued N-1646-39-4 into the Title V operating permit. Include the existing World Wide Graphics Model WWG DAF-1500 aqueous coater and associated radiant curing unit in the equipment description, and utilize UV coatings and install a Prime UV 6-lamp curing system.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued N-1646-39-4, 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. Rupi Gill at (209) 557-6400.

Sincerely,



David Warner
Director of Permit Services

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
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Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: 661-392-5500 FAX: 661-392-5595

TITLE V APPLICATION REVIEW

Minor Modification
Project #: N-1103547

Engineer: Kai Chan
Date: April 15, 2013

Facility Number: N-1646
Facility Name: QG, LLC
Mailing Address: 2201 Cooper Avenue
Merced, CA 95348-4307

Contact Name: Michael Hauptman
Phone: (209) 354-5223

Responsible Official: Tom Estock
Title: Director Environmental Management

I. PROPOSAL

Quebecor World is proposing a Title V minor permit modification to incorporate the issued Authority to Construct (ATC) permit N-1646-39-4 into their Title V operating permit. The facility is modifying their graphic arts printing operation consisting of one Man Roland Model Rotoman N 38" wide 5-color heatset offset lithographic printing press (Press #524) with one 4.587 MMBtu/hr natural gas fired Thermo Wisconsin Model Apollo A3100 drying oven served by the shared 5.728 MMBtu/hr Megtec Cleanswitch Model CS-300-95 natural gas fired regenerative thermal oxidizer (RTO) to include the existing World Wide Graphics Model WWG DAF-1500 aqueous coater and associated radiant curing unit in the permit equipment description and to modify the existing aqueous coater to apply UV coatings and install a new UV curing system inline and after the heatset printing press and associated drying oven.

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-1646-39-6: GRAPHIC ARTS PRINTING OPERATION CONSISTING OF ONE MAN ROLAND MODEL ROTOMAN N 38" WIDE 5-COLOR HEATSET OFFSET LITHOGRAPHIC PRINTING PRESS (PRESS #524) WITH ONE 4.587 MMBTU/HR NATURAL GAS FIRED THERMO WISCONSIN MODEL APOLLO A3100 DRYING OVEN SERVED BY THE SHARED 5.728 MMBTU/HR MEGTEC CLEANSWITCH MODEL CS-300-95 NATURAL GAS FIRED REGENERATIVE THERMAL OXIDIZER, AND ONE WORLD WIDE GRAPHICS MODEL WWG DAF-1500 AQUEOUS/UV COATER WITH A RADIAN CURING UNIT AND PRIME UV 6-LAMP CURING SYSTEM.

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

Quebecor World is proposing to incorporate ATC permit N-1646-39-4 into the Title V PTO as N-1646-39-6 (Heatset Offset Lithographic Printing Press #524). This ATC permit was issued to include the existing World Wide Graphics Model WWG DAF-1500 aqueous coater and associated radiant curing unit in the permit equipment description and to modify the existing aqueous coater to also apply UV coatings and to install a Prime UV 6-Lamp curing system. The aqueous/UV coating and curing equipment are used to apply and cure a glossy or matte finish to the surface of the printed magazine covers or pages. No increase in the current daily VOC emission limits from the use of the printing materials or solvents is proposed due to this proposed modification.

It was recently determined that permit conditions 30 and 31 on ATC permit N-1646-39-4 incorrectly limited the natural gas usage in the drying oven to not exceed 11,651 million cubic feet/year and the natural gas usage in the associated regenerative thermal oxidizer (RTO) to not exceed 25,000 million cubic feet/year. These values were not correctly listed in the conditions due to an error in converting these limits from million Btu to million cubic feet of natural gas. These limits should have stated a limit of 11.651 million cubic feet and 25.0 million cubic feet of natural gas based on a natural gas heating value of 1,000

Btu per cubic feet of natural gas. These conditions will be revised to correctly state these natural gas fuel usage limits under this project.

ATC permit N-1646-39-5 was recently converted into a Permit to Operate (PTO) under Project #N-1122453 to decrease the daily VOC emission limits from 50.0 to 27.5 lb/day. This ATC permit (N-1646-39-4) should have been converted into a PTO prior to the conversion of ATC permit N-1646-39-5. Therefore, proposed PTO N-1646-39-6 will also include the decrease in daily VOC emissions limit to 27.5 lb/day as modified under ATC permit N-1646-39-5.

A copy of the ATC permit N-1646-39-4 is included in Appendix B. The existing PTO is N-1646-39-5 and a copy is included in Appendix E.

Proposed PTO N-1646-39-6:

1. Permit condition 1. 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.
2. Permit conditions 2., 3., 4., 28. and 29. on the ATC permit were deleted since they already appear on the facility-wide permit N-1646-0-2.
3. Permit conditions 5. through 20. from the ATC permit appears as conditions 1 through 16. on the proposed PTO, respectively.
4. Permit condition 21. on the ATC permit was replaced with condition 17. on the proposed PTO. This condition was replaced to reflect the current daily VOC emission due to the implementation of ATC permit N-1646-39-5 as discussed above.
5. Permit conditions 22. through 27. from the ATC permit appears as conditions 18. through 23. on the proposed PTO, respectively.
6. Permit condition 30. on the ATC permit was replaced with condition 24. on the proposed PTO. This condition was revised due to a recently discovered error when converting this annual fuel usage limit from MMBtu to million cubic feet of natural gas as discussed above.
7. Permit condition 31. on the ATC permit was replaced with condition 25. on the proposed PTO. This condition was revised due to a recently discovered error when converting this annual fuel usage limit from MMBtu to million cubic feet of natural gas as discussed above.

8. Permit conditions 32. through 49. from the ATC permit appears as conditions 26. through 43. on the proposed PTO, respectively.

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 Permit N-1646-39-6
- Appendix B:** Authority to Construct Permit N-1646-39-4
- Appendix C:** Emissions Increases
- Appendix D:** Permit Application
- Appendix E:** Previous Title V Operating Permit N-1646-39-5 and Facility-Wide Title V Operating Permit N-1646-0-2.

APPENDIX A

Proposed Modified Title V Operating Permit No.
N-1646-39-6

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1646-39-6

EXPIRATION DATE: 09/30/2013

EQUIPMENT DESCRIPTION:

GRAPHIC ARTS PRINTING OPERATION CONSISTING OF ONE MAN ROLAND MODEL ROTOMAN N 38" WIDE 5-COLOR HEATSET OFFSET LITHOGRAPHIC PRINTING PRESS (PRESS #524) WITH ONE 4.587 MMBTU/HR NATURAL GAS FIRED THERMO WISCONSIN MODEL APOLLO A3100 DRYING OVEN SERVED BY THE SHARED 5.728 MMBTU/HR MEGTEC CLEANSWITCH MODEL CS-300-95 NATURAL GAS FIRED REGENERATIVE THERMAL OXIDIZER, AND ONE WORLD WIDE GRAPHICS MODEL WWG DAF-1500 AQUEOUS/UV COATER WITH A RADIANT CURING UNIT AND PRIME UV 6-LAMP CURING SYSTEM.

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 Rule 2201] Federally Enforceable Through Title V Permit
2. The drying oven and thermal oxidizer 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 the drying oven shall be installed, utilized and maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
4. 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 Rule 2201] Federally Enforceable Through Title V Permit
5. 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
6. 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] Federally Enforceable Through Title V Permit
7. 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
8. The thermal oxidizer shall be operated with a minimum VOC destruction efficiency of 98%. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The VOC content of organic solvents used to perform surface preparation or cleanup 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.

10. 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
11. 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
12. 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
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] Federally Enforceable Through Title V Permit
14. 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
15. 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
16. The VOC content of aqueous and UV coatings shall not exceed 2.2 lb/gal (265 g/l) (less water and exempt compounds) and the VOC content of the aqueous and UV wash primers shall not exceed 2.2 lb/gal (265 g/l). [District Rule 4607]
17. VOC emissions from the printing inks, coatings, fountain solutions, wash primers, and solvents shall not exceed 27.5 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
18. NO_x emissions from the drying oven shall not exceed 4.3 ppmvd @ 19% O₂ (referenced as NO₂). [District Rule 2201] Federally Enforceable Through Title V Permit
19. CO emissions from the drying oven shall not exceed 25.0 ppmvd @ 19% O₂. [District Rule 2201] Federally Enforceable Through Title V Permit
20. Emissions from the drying oven shall not exceed any of the following limits: 0.00285 lb-SO_x/MMBtu, 0.01 lb-PM₁₀/MMBtu, or 0.02 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
21. NO_x emissions from the regenerative thermal oxidizer shall not exceed 4.3 ppmvd @ 19% O₂ (referenced as NO₂). [District Rule 2201] Federally Enforceable Through Title V Permit
22. CO emissions from the regenerative thermal oxidizer shall not exceed 25.0 ppmvd @ 19% O₂. [District Rule 2201] Federally Enforceable Through Title V Permit

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PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

23. Emissions from the regenerative thermal oxidizer shall not exceed any of the following limits: 0.00285 lb-SO_x/MMBtu, 0.01 lb-PM₁₀/MMBtu, or 0.02 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
24. The total quantity of natural gas used in the drying oven under this permit unit shall not exceed 11.651 million cubic feet in any one calendar year. [District NSR Rule] Federally Enforceable Through Title V Permit
25. 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 NSR Rule] Federally Enforceable Through Title V Permit
26. 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
27. 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
28. 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
29. 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
30. The 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 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
32. 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
33. The permittee shall record on a monthly basis, the type and amount of each ink, coating, adhesive, wash primer, and solvent used. [District Rule 4607] Federally Enforceable Through Title V Permit
34. 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
35. 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 the regenerative thermal oxidizer. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
36. The permittee shall maintain a record of the cumulative annual quantity of natural gas used (in cubic feet) by the drying oven and 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
37. All records shall be maintained and retained on-site for a minimum of five years, and shall be made available for District inspection upon request. [District Rules 1070, 2520, and 4607] Federally Enforceable Through Title V Permit
38. The regenerative thermal oxidizer shall be operated at a minimum temp. of 1400 deg. F. The regenerative thermal oxidizer 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
39. The regenerative thermal oxidizer shall be equipped with a continuous temperature monitoring and recording instrument. [District Rules 2201 and 2520 and 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.

40. 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
41. 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
42. 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
43. 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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APPENDIX B

Authority to Construct Permit No.
N-1646-39-4



COPY

AUTHORITY TO CONSTRUCT

PERMIT NO: N-1646-39-4

ISSUANCE DATE: 06/22/2011

LEGAL OWNER OR OPERATOR: WORLDCOLOR (USA) LLC

MAILING ADDRESS: 2201 COOPER AVE
MERCED, CA 95348

LOCATION: 2201 COOPER AVE
MERCED, CA 95348

EQUIPMENT DESCRIPTION:

MODIFICATION OF GRAPHIC ARTS PRINTING OPERATION CONSISTING OF ONE MAN ROLAND MODEL ROTOMAN N 38" WIDE 5-COLOR HEATSET OFFSET LITHOGRAPHIC PRINTING PRESS (PRESS #524) WITH ONE 4.587 MMBTU/HR NATURAL GAS FIRED THERMO WISCONSIN MODEL APOLLO A3100 DRYING OVEN SERVED BY THE SHARED 5.728 MMBTU/HR MEGTEC CLEANSWITCH MODEL CS-300-95 NATURAL GAS FIRED REGENERATIVE THERMAL OXIDIZER TO INCLUDE THE EXISTING WORLD WIDE GRAPHICS MODEL WWG DAF-1500 AQUEOUS COATER AND ASSOCIATED RADIANT CURING UNIT TO THE EQUIPMENT DESCRIPTION, AND TO UTILIZE UV COATINGS AND INSTALL AN ASSOCIATED PRIME UV 6-LAMP CURING SYSTEM.

CONDITIONS

1. 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
2. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. 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
4. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
5. 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

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 TAPCO

[Signature]
DAVID WARNER, Director of Permit Services

N-1646-39-4 Jun 22 2011 1:00PM - CHANK Joint Inspection NOT Required

6. The drying oven and thermal oxidizer shall be fired exclusively on natural gas. [District NSR Rule] Federally Enforceable Through Title V Permit
7. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of natural gas combusted in the drying oven shall be installed, utilized and maintained. [District NSR Rule] Federally Enforceable Through Title V Permit
8. 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 NSR Rule] Federally Enforceable Through Title V Permit
9. 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 NSR Rule] Federally Enforceable Through Title V Permit
10. 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] Federally Enforceable Through Title V Permit
11. The collection system for the dryer exhausts and for all fugitive VOC emissions shall have a minimum capture efficiency of 90%. [District NSR Rule] Federally Enforceable Through Title V Permit
12. The thermal oxidizer shall be operated with a minimum VOC destruction efficiency of 98%. [District NSR Rule] Federally Enforceable Through Title V Permit
13. The VOC content of organic solvents used to perform surface preparation or cleanup 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
14. 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
15. 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
16. 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
17. 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
18. 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

CONDITIONS CONTINUE ON NEXT PAGE

19. 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 NSR Rule] Federally Enforceable Through Title V Permit
20. The VOC content of aqueous and UV coatings shall not exceed 2.2 lb/gal (265 g/l) (less water and exempt compounds) and the VOC content of the aqueous and UV wash primers shall not exceed 2.2 lb/gal (265 g/l). [District Rule 4607]
21. VOC emissions from the printing inks, coatings, fountain solutions, wash primers, and solvents shall not exceed 50.0 pounds in any one day. [District NSR Rule] Federally Enforceable Through Title V Permit
22. NOx emissions from the drying oven shall not exceed 4.3 ppmvd @ 19% O2 (referenced as NO2). [District Rules 2201] Federally Enforceable Through Title V Permit
23. CO emissions from the drying oven shall not exceed 25.0 ppmvd @ 19% O2. [District Rules 2201] Federally Enforceable Through Title V Permit
24. Emissions from the drying oven shall not exceed any of the following limits: 0.00285 lb-SOx/MMBtu, 0.01 lb-PM10/MMBtu, or 0.02 lb-VOC/MMBtu. [District NSR Rule] Federally Enforceable Through Title V Permit
25. NOx emissions from the regenerative thermal oxidizer shall not exceed 4.3 ppmvd @ 19% O2 (referenced as NO2). [District Rules 2201] Federally Enforceable Through Title V Permit
26. CO emissions from the regenerative thermal oxidizer shall not exceed 25.0 ppmvd @ 19% O2. [District Rules 2201] Federally Enforceable Through Title V Permit
27. Emissions from the regenerative thermal oxidizer shall not exceed any of the following limits: 0.00285 lb-SOx/MMBtu, 0.01 lb-PM10/MMBtu, or 0.02 lb-VOC/MMBtu. [District NSR Rule] Federally Enforceable Through Title V Permit
28. 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] Federally Enforceable Through Title V Permit
29. 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] Federally Enforceable Through Title V Permit
30. The total quantity of natural gas used in the drying oven under this permit unit shall not exceed 11,651 million cubic feet in any one calendar year. [District NSR Rule] Federally Enforceable Through Title V Permit
31. The total quantity of natural gas used in the thermal oxidizer shall not exceed 25,000 million cubic feet in any one calendar year. [District NSR Rule] Federally Enforceable Through Title V Permit
32. 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
33. 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
34. 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
35. 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
36. The 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
37. 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

CONDITIONS CONTINUE ON NEXT PAGE

38. 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
39. The permittee shall record on a monthly basis, the type and amount of each ink, coating, adhesive, wash primer, and solvent used. [District Rule 4607] Federally Enforceable Through Title V Permit
40. 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
41. 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 the regenerative thermal oxidizer. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
42. The permittee shall maintain a record of the cumulative annual quantity of natural gas used (in cubic feet) by the drying oven and thermal oxidizer under this permit. The cumulative total quantity of natural gas used shall be updated monthly. [District NSR Rule] Federally Enforceable Through Title V Permit
43. All records shall be maintained and retained on-site for a minimum of five years, and shall be made available for District inspection upon request. [District Rules 1070, 2520, and 4607] Federally Enforceable Through Title V Permit
44. The regenerative thermal oxidizer shall be operated at a minimum temp. of 1400 deg. F. The regenerative thermal oxidizer 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
45. The regenerative thermal incinerator shall be equipped with a continuous temperature monitoring and recording instrument. [District Rules 2201 and 2520 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
46. 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
47. 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
48. 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
49. 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

APPENDIX C

Emissions Increases

Permit Number	SSIPE (lb/year)				
	NOx	VOC	CO	SOx	PM10
N-1646-39-6	0	0	0	0	0
TOTAL	0	0	0	0	0

APPENDIX D

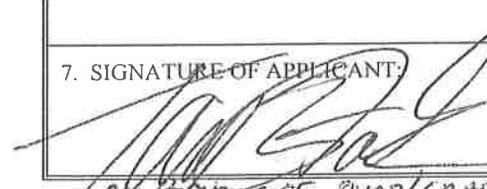
Application

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: QG, LLC, Permit N-1646	
2. MAILING ADDRESS: STREET/P.O. BOX: <u>2201 Cooper Avenue</u> CITY: <u>Merced</u> STATE: <u>CA</u> 9-DIGIT ZIP CODE: <u>95348-4307</u>	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: <u>2201 Cooper Ave</u> CITY: <u>Merced</u> _____ ¼ SECTION _____ TOWNSHIP _____ RANGE _____	INSTALLATION DATE: Approximately July 1, 2011
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 N-1646-39. Addition of a UV-Lamp curing system (ATC Permit 1646-39-4) and application of UV coating. QG, LLC would request that ATC Permit 1646-39-4 be converted to a Permit to Operate.	
6. TYPE OR PRINT NAME OF APPLICANT: Tom Estock	TITLE OF APPLICANT: Director-Environmental Mgmt
7. SIGNATURE OF APPLICANT:  DATE: <u>03/18/2013</u>	PHONE: (414) 566-7617 FAX: () EMAIL: tom.estock@qg.com

ON BEHALF OF QG/GRAPHICS, LLC.

For APCD Use Only:

DATE STAMP APR 03 2013 SJVAPCD NORTHERN REGION	FILING FEE RECEIVED: \$ _____ CHECK#: _____ DATE PAID: _____ PROJECT NO: _____ FACILITY ID: _____
--	---

Central Regional Office • 1990 E. Gettysburg Avenue • Fresno, CA 93726-0244 • (559) 230-5900 • FAX (559) 230-6061

RECEIVED

APR 03 2013

SJVAPCD
NORTHERN REGION

San Joaquin Valley Unified Air Pollution Control District

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

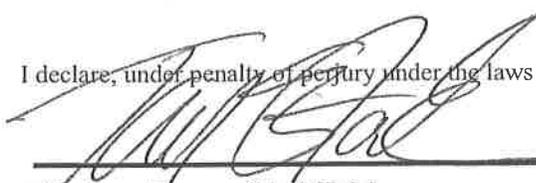
- SIGNIFICANT PERMIT MODIFICATION ADMINISTRATIVE
 MINOR PERMIT MODIFICATION AMENDMENT

COMPANY NAME: QG, LLC	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: Quad Graphics, Inc	
3. Agent to the Owner: Tom Estock	

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:



 Signature of Responsible Official
Tom Estock, President of Quad Graphics, Inc.

03/18/2013

 Date

Tom Estock

 Name of Responsible Official (please print)

Director-Environmental Mgmt

 Title of Responsible Official (please print)

APPENDIX E

Previous Title V Operating Permit No.
N-1646-39-5

&

Facility-Wide Title V Operating Permit No.
N-1646-0-2

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1646-39-5

EXPIRATION DATE: 09/30/2013

EQUIPMENT DESCRIPTION:

GRAPHIC ARTS PRINTING OPERATION CONSISTING OF ONE MAN ROLAND MODEL ROTOMAN N 38" WIDE 5-COLOR HEATSET OFFSET LITHOGRAPHIC PRINTING PRESS (PRESS #524) WITH ONE 4.587 MMBTU/HR NATURAL GAS FIRED THERMO WISCONSIN MODEL APOLLO A3100 DRYING OVEN SERVED BY THE 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 Rule 2201] Federally Enforceable Through Title V Permit
2. The drying oven and thermal oxidizer 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 drying oven shall be installed, utilized and maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
4. 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 Rule 2201] Federally Enforceable Through Title V Permit
5. 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
6. 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]
7. The collection system for the dryer exhausts and for all fugitive VOC emissions shall have a minimum capture efficiency of 90%. [District NSR Rule and 4607, 5.6] Federally Enforceable Through Title V Permit
8. The thermal oxidizer shall be operated with a minimum VOC destruction efficiency of 98%. [District NSR Rule and 4607, 5.6] Federally Enforceable Through Title V Permit
9. 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] Federally Enforceable Through Title V Permit
10. The thermal oxidizer shall be equipped with an operational continuous temperature monitoring and recording instrument. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The VOC content of organic solvents used to perform surface preparation or cleanup 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, 5.8.1] 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, 5.8.3] 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, 5.8.4] 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, 5.8.5] 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, 5.9] 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, 5.10] Federally Enforceable Through Title V Permit
17. 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 NSR Rule] Federally Enforceable Through Title V Permit
18. VOC emissions from the printing inks and solvents shall not exceed 27.5 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
19. NO_x emissions from the drying oven shall not exceed 4.3 ppmvd @ 19% O₂ (referenced as NO₂). [District Rule 2201] Federally Enforceable Through Title V Permit
20. CO emissions from the drying oven shall not exceed 25.0 ppmvd @ 19% O₂. [District Rule 2201] Federally Enforceable Through Title V Permit
21. Emissions from the drying oven shall not exceed any of the following limits: 0.00285 lb-SO_x/MMBtu, 0.0076 lb-PM₁₀/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
22. NO_x emissions from the regenerative thermal oxidizer shall not exceed 4.3 ppmvd @ 19% O₂ (referenced as NO₂). [District Rule 2201] Federally Enforceable Through Title V Permit
23. CO emissions from the regenerative thermal oxidizer shall not exceed 25.0 ppmvd @ 19% O₂. [District Rule 2201] Federally Enforceable Through Title V Permit
24. Emissions from the regenerative thermal oxidizer shall not exceed any of the following limits: 0.00285 lb-SO_x/MMBtu, 0.0076 lb-PM₁₀/MMBtu, or 0.0055 lb-VOC/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 total quantity of natural gas used in the drying oven under this permit unit shall not exceed 11,651 million cubic feet in any one calendar year. [District Rule 2201] Federally Enforceable Through Title V Permit
26. The total quantity of natural gas used in the thermal oxidizer shall not exceed 25,000 million cubic feet in any one calendar year. [District Rule 2201] Federally Enforceable Through Title V Permit
27. 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
28. 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
29. 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
30. 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, 6.4.7] Federally Enforceable Through Title V Permit
31. 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, 6.1.1] 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 4607, 6.1.3] Federally Enforceable Through Title V Permit
33. 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, 6.1.2.1] Federally Enforceable Through Title V Permit
34. The permittee shall record on a monthly basis, the type and amount of each ink, coating, adhesive, wash primer, and solvent used. [District Rule 4607, 6.1.2.2] Federally Enforceable Through Title V Permit
35. The permittee shall record on a monthly basis, the type, amount and percent VOC by volume of each fountain solution used. [District Rule 4607, 6.1.2.3] Federally Enforceable Through Title V Permit
36. 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 the regenerative thermal oxidizer. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
37. The permittee shall maintain a record of the cumulative annual quantity of natural gas used (in cubic feet) by the drying oven and thermal oxidizer under this permit. The cumulative total quantity of natural gas used shall be updated monthly. [District NSR Rule] Federally Enforceable Through Title V Permit
38. All records shall be maintained and retained on-site for a minimum of five years, and shall be made available for District inspection upon request. [District Rules 1070, 2520, and 4607] Federally Enforceable Through Title V Permit
39. The regenerative thermal oxidizer shall be operated at a minimum temp. of 1400 deg. F. The regenerative thermal oxidizer 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
40. The regenerative thermal incinerator shall be equipped with a continuous temperature monitoring and recording instrument. [District Rules 2201 and 2520 and 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.

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
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

FACILITY: N-1646-0-2

EXPIRATION DATE: 09/30/2013

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 NO_x emissions from the entire stationary source (excluding permit unit N-1646-34) 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 and Merced County Rule 109] 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 and Merced County Rule 109] 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 (12/20/07). [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
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

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: QG, LLC
Location: 2201 COOPER AVE, MERCED, CA 95348
N-1646-0-2 : Feb 20 2013 5:15PM - CHANK

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
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

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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 (2/17/05). 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 Merced County Rule 401] Federally Enforceable Through Title V Permit
27. No person shall manufacture, blend, repackage, supply, sell, solicit or apply any architectural coating within the District with a VOC content in excess of the corresponding limit specified in the Table of Standards 1 (effective through 12/31/2010) or the Table of Standards 2 (effective on and after 1/1/2011) of District Rule 4601 (12/17/09). [District Rule 4601, 5.1] Federally Enforceable Through Title V Permit
28. All VOC-containing materials for architectural coatings subject to Rule 4601 (12/17/09) 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 (12/17/09). [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 (8/19/04) or Rule 8011 (8/19/04). [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 (8/19/04) or Rule 8011 (8/19/04). [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 (8/19/04) or Rule 8011 (8/19/04). [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 (8/19/04) or Rule 8011 (8/19/04). [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 (8/19/04) or Rule 8011 (8/19/04). [District Rule 8061 and Rule 8011] Federally Enforceable Through Title V Permit

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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 (9/16/04) or Rule 8011 (8/19/04). [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: Merced County Rule 401 and Merced County Rule 109. 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 (2/17/05); 4601, sections 5.1, 5.2, 5.3 and 5.8 (12/17/09); 8021 (8/19/04); 8031 (8/19/04); 8041 (8/19/04); 8051 (8/19/04); 8061 (8/19/04); and 8071 (9/16/04). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
45. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report begin August 1 of every year, 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

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