



NOV 1 3 2009

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

Re: Notice of Final Decision - ATC / Certificate of Conformity

Facility # N-1646 Project # N-1074543

Dear Mr. Rios:

The Air Pollution Control Officer has issued Authority to Construct permits to Quebecor World for Modification of the drying ovens serving heatset offset lithographic printing presses #508 (ATC Permit N-1646-25-2), #531 (ATC Permit N-1646-26-3), and #520 (ATC Permit N-1646-36-1) to comply with the requirements of District Rule 4309 (Dryers, Dehydrators, and Ovens) utilizing the facility shared regenerative thermal oxidizers at 2201 Cooper Avenue in Merced.

Enclosed are copies of the Authority to Construct permits and a copy of the notice of final action to be published approximately three days from the date of this letter.

Notice of the District's preliminary decision to issue this Authority to Construct with Certificate of Conformity was published on September 23, 2009. The District's analysis of the proposal was also sent to CARB on September 23, 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.

Thank you for your cooperation in this matter.

Sincerely,

David Warner

Director of Permit Services

DW: KC/cm

Enclosures

Seyed Sadredin Executive Director/Air Pollution Control Officer





NOV 1 3 2009

Mike Tollstrup, Chief Project Assessment Branch Air Resources Board P O Box 2815 Sacramento, CA 95812-2815

Re: Notice of Final Decision - ATC / Certificate of Conformity

Facility # N-1646 Project # N-1074543

Dear Mr. Tollstrup:

The Air Pollution Control Officer has issued Authority to Construct permits to Quebecor World for Modification of the drying ovens serving heatset offset lithographic printing presses #508 (ATC Permit N-1646-25-2), #531 (ATC Permit N-1646-26-3), and #520 (ATC Permit N-1646-36-1) to comply with the requirements of District Rule 4309 (Dryers, Dehydrators, and Ovens) utilizing the facility shared regenerative thermal oxidizers at 2201 Cooper Avenue in Merced.

Enclosed are copies of the Authority to Construct permits and a copy of the notice of final action to be published approximately three days from the date of this letter.

Notice of the District's preliminary decision to issue this Authority to Construct with Certificate of Conformity was published on September 23, 2009. The District's analysis of the proposal was also sent to US EPA Region IX on September 23, 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





NOV 1 3 2009

Mr. Roger Ashlock Quebecor World 2201 Cooper Avenue Merced, CA 95344-1139

Notice of Final Decision - ATC / Certificate of Conformity Re:

Facility # N-1646 Project # N-1074543

Dear Mr. Ashlock:

The Air Pollution Control Officer has issued Authority to Construct permits to Quebecor World for Modification of the drying ovens serving heatset offset lithographic printing presses #508 (ATC Permit N-1646-25-2), #531 (ATC Permit N-1646-26-3), and #520 (ATC Permit N-1646-36-1) to comply with the requirements of District Rule 4309 (Dryers, Dehydrators, and Ovens) utilizing the facility shared regenerative thermal oxidizers at 2201 Cooper Avenue in Merced.

Enclosed are copies of the Authority to Construct permits and a copy of the notice of final action to be published approximately three days from the date of this letter.

Notice of the District's preliminary decision to issue this Authority to Construct with Certificate of Conformity was published on September 23, 2009. The District's analysis of the proposal was also sent to US EPA Region IX on September 23, 2009. No comments were received following the District's preliminary decision on this project.

Also enclosed is an invoice for the engineering evaluation fees pursuant to District Rule 3010. Please remit the amount owed, along with a copy of the attached invoice, within 30 days.

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







AUTHORITY TO CONSTRUCT

PERMIT NO: N-1646-25-2

ISSUANCE DATE: 11/10/2009

LEGAL OWNER OR OPERATOR: QUEBECOR WORLD **MAILING ADDRESS:**

2201 COOPER AVE MERCED, CA 95348

LOCATION:

2201 COOPER AVE MERCED, CA

EQUIPMENT DESCRIPTION:

MODIFICATION OF THE GRAPHIC ARTS PRINTING OPERATION CONSISTING OF ONE (1) KOENIG & BAUER COMMANDER HEATSET OFFSET LITHOGRAPHIC PRINTING PRESS (PRESS #508) AND ONE (1) 31.5 MMBTU/HR (3 BURNERS @ 10.5 MMBTU/HR EACH) NATURAL GAS FIRED MEGTEC MODEL DUAL DRY III 119 DRYING OVEN SERVED BY THE 9.5 MMBTU/HR MEGTEC ENTERPRISE II OR THE 18 MMBTU/HR REECO RETHERM MODEL E NATURAL GAS FIRED REGENERATIVE THERMAL OXIDIZERS TO UTILIZE THE OXIDIZERS TO CONTROL THE NOX AND CO EMISSIONS FROM THE DRYING OVENS TO COMPLY WITH THE EMISSION REQUIREMENTS OF DISTRICT RULE 4309. THE 18.0 MMBTU/HR REECO RETHERM OXIDIZER WILL ALSO BE RETROFITTED WITH A MAXON OR EQUIVALENT LOW NOX BURNER.

CONDITIONS

- No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
- No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (11/15/01). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101, and County Rules 401 (in all eight counties in the San Joaquin Valley)] Federally Enforceable Through Title V Permit
- 3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
- 4. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule] 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 Sadredi xecutive Director

NER. Director of Permit Services

- 5. The drying ovens and regenerative thermal oxidizers shall be fired exclusively on natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
- 6. The drying ovens serving the heatset offset printing press shall be maintained under negative pressure and shall be vented through the regenerative 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
- 7. The collection system for the dryer exhausts 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
- 8. Each regenerative thermal oxidizer shall be operated with a minimum VOC destruction efficiency of 98%. [District Rules 2201 and 4607] Federally Enforceable Through Title V Permit
- 9. Each 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
- 10. Each 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
- 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] 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, 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. 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 Rule 2201] Federally Enforceable Through Title V Permit

- 18. VOC emissions from the printing inks and solvents shall not exceed 74.1 pounds in any one day. [District NSR Rule] Federally Enforceable Through Title V Permit
- 19. NOx emissions from the drying oven shall not exceed 4.3 ppmvd @ 19% O2 (referenced as NO2). [District Rules 2201 & 4309] Federally Enforceable Through Title V Permit
- 20. CO emissions from the drying oven shall not exceed 25.0 ppmvd @ 19% O2. [District Rules 2201 & 4309] Federally Enforceable Through Title V Permit
- 21. PM10 emissions from the drying oven shall not exceed 0.0076 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
- 22. SOx emissions from the drying oven shall not exceed 0.00285 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
- 23. VOC emission from the drying oven shall not exceed 0.0055 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
- 24. NOx emissions from the regenerative thermal oxidizers shall not exceed 4.3 ppmvd @ 19% O2 (referenced as NO2). [District Rules 2201 & 4309] Federally Enforceable Through Title V Permit
- 25. CO emissions from the regenerative thermal oxidizers shall not exceed 25.0 ppmvd @ 19% O2. [District Rules 2201 & 4309] Federally Enforceable Through Title V Permit
- 26. PM10 emissions from the regenerative thermal oxidizers shall not exceed 0.0076 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
- 27. SOx emissions from the regenerative thermal oxidizers shall not exceed 0.00285 lbs/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
- 28. VOC emissions from the regenerative thermal oxidizer shall not exceed 0.0055 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
- 29. 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
- 30. 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
- 31. 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
- 32. 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
- 33. Source testing to measure NOx and CO emissions from the drying ovens shall be conducted at the exhaust of the associated regenerative thermal oxidizer within 60 days of initial start-up and at least once every 24 months thereafter. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit
- 34. All test results for NOx and CO shall be reported in ppmv @ 19% O2 (or no correction if measured above 19% O2), corrected to dry stack conditions. [District Rule 4309] Federally Enforceable Through Title V Permit
- 35. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis. [District Rule 4309] Federally Enforceable Through Title V Permit
- 36. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rule 4309] Federally Enforceable Through Title V Permit
- 37. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4309] Federally Enforceable Through Title V Permit

- 38. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4309. [District Rule 4309] Federally Enforceable Through Title V Permit
- 39. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rule 4309] Federally Enforceable Through Title V Permit
- 40. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
- 41. 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
- 42. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rule 4309] Federally Enforceable Through Title V Permit
- 43. If either the NOx or CO concentrations corrected to 19% O2 (or no correction if measured above 19% O2), as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been reestablished, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rule 4309] Federally Enforceable Through Title V Permit
- 44. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4309] Federally Enforceable Through Title V Permit
- 45. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 19% O2 (or no correction if measured above 19% O2), (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range [District Rule 4309] Federally Enforceable Through Title V Permit
- 46. 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
- 47. 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
- 48. 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
- 49. 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

- 50. 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
- 51. 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 regenerative thermal oxidizer. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
- 52. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 2520, and 4607, and 4309] Federally Enforceable Through Title V Permit
- 53. Each thermal oxidizer shall be operated at a minimum temp. of 1400 deg. F. Upon determining an excursion from this requirement, the permittee shall investigate the excursion and take corrective action to minimize emissions and prevent recurrence of the excursion as expeditiously as practicable. [District Rule 2520 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
- 54. 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
- 55. 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
- 56. 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
- 57. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
- 58. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit







AUTHORITY TO CONSTRUCT

PERMIT NO: N-1646-26-3

ISSUANCE DATE: 11/10/2009

LEGAL OWNER OR OPERATOR: QUEBECOR WORLD

QUEBECOR WORLD
2201 COOPER AVE

MAILING ADDRESS:

MERCED, CA 95348

LOCATION:

2201 COOPER AVE

MERCED, CA

EQUIPMENT DESCRIPTION:

MODIFICATION OF THE GRAPHIC ARTS PRINTING OPERATION CONSISTING OF A GOSS GRAPHICS SYSTEMS, INC. MODEL C700-E HEATSET OFFSET LITHOGRAPHIC PRINTING PRESS (PRESS #531) SERVED BY A 10.5 MMBTU/HR NATURAL GAS FIRED MEGTEC MODEL DUEL DRY III 119 DRYING OVEN VENTED TO THE SHARED 5.728 MMBTU/HR MEGTEC CLEANSWITCH MODEL CS-300-95 NATURAL GAS FIRED REGENERATIVE THERMAL OXIDIZER TO UTILIZE THE OXIDIZER TO CONTROL THE NOX AND CO EMISSIONS FROM THE DRYING OVEN TO COMPLY WITH THE EMISSION REQUIREMENTS OF DISTRICT RULE 4309.

CONDITIONS

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

Seyed Sadredin, Executive Directo / APCO

DAVID WAF NER, Director of Permit Services
N-1848-28-3: Nov 10 2509 9:37AM - CHANK: Joint Inspection NOT Required

- 6. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of natural gas combusted in the regenerative thermal oxidizer shall be installed, utilized and maintained. [District Rules 2201] Federally Enforceable Through Title V Permit
- 7. The drying ovens serving the heatset offset printing press shall be maintained under negative pressure and shall be vented through the regenerative 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
- 8. The collection system for the dryer exhausts 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
- 9. The regenerative thermal oxidizer shall be operated with a minimum VOC destruction efficiency of 98%. [District Rules 2201 and 4607] Federally Enforceable Through Title V Permit
- 10. 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
- 11. 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
- 12. 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
- 13. 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
- 14. 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
- 15. 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
- 16. 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
- 17. 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

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- 19. VOC emissions from the printing inks and solvents shall not exceed 61.4 pounds in any one day. [District NSR Rule] Federally Enforceable Through Title V Permit
- 20. NOx emissions from the drying oven shall not exceed 4.3 ppmvd @ 19% O2 (referenced as NO2). [District Rules 2201 & 4309] Federally Enforceable Through Title V Permit
- 21. CO emissions from the drying oven shall not exceed 25.0 ppmvd @ 19% O2. [District Rules 2201 & 4309] Federally Enforceable Through Title V Permit
- 22. PM10 emissions from the drying oven shall not exceed 0.0076 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
- 23. SOx emissions from the drying oven shall not exceed 0.00285 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
- 24. VOC emission from the drying oven shall not exceed 0.0055 lb/MMBtu. [District Rule 2201] 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 & 4309] 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 & 4309] Federally Enforceable Through Title V Permit
- 27. 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
- 28. The SOx emissions rate from the regenerative thermal oxidizer shall not exceed 0.00285 lbs/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
- 29. 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
- 30. Total VOC emissions from the stationary source (excluding permit unit N-1646-34) shall not exceed 235.6 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
- 31. Total NOx emissions from the stationary source (excluding permit unit N-1646-34) shall not exceed 150 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
- 32. The total quantity of natural gas used in the thermal oxidizer shall not exceed 25.0 million cubic feet in any one calendar year. [District Rule 2201] Federally Enforceable Through Title V Permit
- 33. Source testing to demonstrate compliance with the VOC destruction efficiency of the regenerative thermal oxidizer shall be conducted on an annual basis. [District Rule 2201] Federally Enforceable Through Title V Permit
- 34. 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
- 35. Source testing to measure NOx and CO emissions from the drying ovens shall be conducted at the exhaust of the associated regenerative thermal oxidizer within 60 days of initial start-up and at least once every 24 months thereafter. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit
- 36. All test results for NOx and CO shall be reported in ppmv @ 19% O2 (or no correction if measured above 19% O2), corrected to dry stack conditions. [District Rule 4309] Federally Enforceable Through Title V Permit
- 37. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis. [District Rule 4309] Federally Enforceable Through Title V Permit

- 38. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rule 4309] Federally Enforceable Through Title V Permit
- 39. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4309] Federally Enforceable Through Title V Permit
- 40. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4309. [District Rule 4309] Federally Enforceable Through Title V Permit
- 41. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rule 4309] Federally Enforceable Through Title V Permit
- 42. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
- 43. 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
- 44. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rule 4309] Federally Enforceable Through Title V Permit
- 45. If either the NOx or CO concentrations corrected to 19% O2 (or no correction if measured above 19% O2), as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been reestablished, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rule 4309] Federally Enforceable Through Title V Permit
- 46. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4309] Federally Enforceable Through Title V Permit
- 47. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 19% O2 (or no correction if measured above 19% O2), (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range [District Rule 4309] Federally Enforceable Through Title V Permit
- 48. 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
- 49. 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

- 50. 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
- 51. 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
- 52. 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
- 53. 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
- 54. 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
- 55. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 2520, and 4607, and 4309] Federally Enforceable Through Title V Permit
- 56. 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
- 57. 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
- 58. 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
- 59. 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
- 60. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
- 61. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit







AUTHORITY TO CONSTRUCT

PERMIT NO: N-1646-36-1

ISSUANCE DATE: 11/10/2009

LEGAL OWNER OR OPERATOR: QUEBECOR WORLD

2201 COOPER AVE

MAILING ADDRESS:

MERCED, CA 95348

LOCATION:

2201 COOPER AVE

MERCED, CA

EQUIPMENT DESCRIPTION:

MODIFICATION OF THE GRAPHIC ARTS PRINTING OPERATION CONSISTING OF ONE MAN ROLAND MODEL ROTOMANS 57.5" WIDE 8-COLOR HEATSET OFFSET LITHOGRAPHIC PRINTING PRESS (PRESS #520) AND TWO 9.9 MMBTU/HR NATURAL GAS FIRED MEGTEC MODEL DD III-135 DRYING OVENS (EACH CONSISTS OF AN 8.4 MMBTU/HR MAXON OVENPAK 400 BURNER AND A 1.5 MMBTU/HR MAXON APX BURNER) SERVED BY THE 9.5 MMBTU/HR MEGTEC ENTERPRISE II OR THE 18 MMBTU/HR REECO RETHERM MODEL E NATURAL GAS FIRED REGENERATIVE THERMAL OXIDIZER TO UTILIZE THE OXIDIZERS TO CONTROL THE NOX AND CO EMISSIONS FROM THE DRYING OVENS TO COMPLY WITH THE EMISSION REQUIREMENTS OF DISTRICT RULE 4309. THE 18.0 MMBTU/HR REECO RETHERM OXIDIZER WILL ALSO BE RETROFITTED WITH A MAXON OR EQUIVALENT LOW NOX BURNER.

CONDITIONS

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

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DAVID WARNER, Director of Permit Services

- 5. The drying ovens and regenerative thermal oxidizers shall be fired exclusively on natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
- 6. The drying ovens serving the heatset offset printing press shall be maintained under negative pressure and shall be vented through the regenerative 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
- 7. 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]
- 8. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of natural gas combusted in the drying ovens shall be installed, utilized and maintained. [District Rules 2201] Federally Enforceable Through Title V Permit
- 9. The collection system for the dryer exhausts 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
- 10. Each regenerative thermal oxidizer shall be operated with a minimum VOC destruction efficiency of 98%. [District Rules 2201 and 4607] Federally Enforceable Through Title V Permit
- 11. Each 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
- 12. Each 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
- 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. 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
- 19. 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 Rule 2201] Federally Enforceable Through Title V Permit
- 20. VOC emissions from the printing inks and solvents shall not exceed 50.0 pounds in any one day. [District NSR Rule] Federally Enforceable Through Title V Permit
- 21. NOx emissions from the drying oven shall not exceed 4.3 ppmvd @ 19% O2 (referenced as NO2). [District Rules 2201 & 4309] Federally Enforceable Through Title V Permit
- 22. CO emissions from the drying oven shall not exceed 25.0 ppmvd @ 19% O2. [District Rules 2201 & 4309] Federally Enforceable Through Title V Permit
- 23. PM10 emissions from the drying oven shall not exceed 0.0076 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
- 24. SOx emissions from the drying oven shall not exceed 0.00285 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
- 25. VOC emission from the drying oven shall not exceed 0.0055 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
- 26. NOx emissions from the regenerative thermal oxidizers shall not exceed 4.3 ppmvd @ 19% O2 (referenced as NO2). [District Rules 2201 & 4309] Federally Enforceable Through Title V Permit
- 27. CO emissions from the regenerative thermal oxidizers shall not exceed 25.0 ppmvd @ 19% O2. [District Rules 2201 & 4309] Federally Enforceable Through Title V Permit
- 28. PM10 emissions from the regenerative thermal oxidizers shall not exceed 0.0076 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
- 29. SOx emissions from the regenerative thermal oxidizers shall not exceed 0.00285 lbs/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
- 30. VOC emissions from the regenerative thermal oxidizer shall not exceed 0.0055 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
- 31. Total VOC emissions from the stationary source (excluding permit unit N-1646-34) shall not exceed 235.6 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
- 32. Total NOx emissions from the stationary source (excluding permit unit N-1646-34) shall not exceed 150 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
- 33. The total quantity of natural gas used in the drying ovens under this permit unit shall not exceed 18.7 million cubic feet in any one calendar year. [District Rule 2201] Federally Enforceable Through Title V Permit
- 34. 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
- 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] Federally Enforceable Through Title V Permit
- 36. Source testing to measure NOx and CO emissions from the drying ovens shall be conducted at the exhaust of the associated regenerative thermal oxidizer within 60 days of initial start-up and at least once every 24 months thereafter. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit
- 37. All test results for NOx and CO shall be reported in ppmv @ 19% O2 (or no correction if measured above 19% O2), corrected to dry stack conditions. [District Rule 4309] Federally Enforceable Through Title V Permit

- 38. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis. [District Rule 4309] Federally Enforceable Through Title V Permit
- 39. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rule 4309] Federally Enforceable Through Title V Permit
- 40. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4309] Federally Enforceable Through Title V Permit
- 41. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4309. [District Rule 4309] Federally Enforceable Through Title V Permit
- 42. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rule 4309] Federally Enforceable Through Title V Permit
- 43. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
- 44. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
- 45. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rule 4309] Federally Enforceable Through Title V Permit
- 46. If either the NOx or CO concentrations corrected to 19% O2 (or no correction if measured above 19% O2), as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been reestablished, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rule 4309] Federally Enforceable Through Title V Permit
- 47. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4309] Federally Enforceable Through Title V Permit
- 48. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 19% O2 (or no correction if measured above 19% O2), (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range [District Rule 4309] Federally Enforceable Through Title V Permit
- 49. 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

- 50. 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
- 51. 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
- 52. 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
- 53. 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
- 54. 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 regenerative thermal oxidizer. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
- 55. 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
- 56. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 2520, and 4607, and 4309] Federally Enforceable Through Title V Permit
- 57. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
- 58. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit