



AUG 13 2013

Mr. Thomas Estock  
QG, LLC  
N61 W23044 Harry's Way  
Sussex, WI 53089-3995

**Re: Notice of Preliminary Decision – Title V Permit Renewal**  
**District Facility # N-1646**  
**Project # N-1130565**

Dear Mr. Estock:

Enclosed for your review and comment is the District's analysis of the application to renew the Federally Mandated Operating Permit for QG, LLC at 2201 Cooper Avenue in Merced, California.

The notice of preliminary decision for this project will be published approximately three days from the date of this letter. After addressing all comments made during the 30-day public notice and the 45-day EPA comment periods, the District intends to issue the renewed Federally Mandated Operating Permit. Please submit your written comments on this project within the 30-day public comment period, as specified in the enclosed public notice.

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

Enclosures

cc: Mike Tollstrup, CARB (w/enclosure) via email  
cc: Gerardo C. Rios, EPA (w/enclosure) via email

**Seyed Sadredin**  
Executive Director/Air Pollution Control Officer

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**Northern Region**  
4800 Enterprise Way  
Modesto, CA 95356-8718  
Tel: (209) 557-6400 FAX: (209) 557-6475

**Central Region (Main Office)**  
1990 E. Gettysburg Avenue  
Fresno, CA 93726-0244  
Tel: (559) 230-6000 FAX: (559) 230-6061

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

Newspaper notice for publication in Merced Sun Star and for posting on valleyair.org

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**NOTICE OF PRELIMINARY DECISION  
FOR THE PROPOSED RENEWAL OF  
THE FEDERALLY MANDATED OPERATING PERMIT**

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Air Pollution Control District solicits public comment on the proposed renewal of the Federally Mandated Operating Permit to QG, LLC at 2201 Cooper Avenue in Merced, California.

The District's analysis of the legal and factual basis for this proposed action, project #N-1130565, is available for public inspection at [http://www.valleyair.org/notices/public\\_notices\\_idx.htm](http://www.valleyair.org/notices/public_notices_idx.htm) and at any District office. There are no emission changes associated with this proposed action. This will be the public's only opportunity to comment on the specific conditions of the proposed renewal of the Federally Mandated Operating permit. If requested, the District will hold a public hearing regarding issuance of this renewed permit. For additional information, please contact the District at (209) 557-6400. Written comments on the proposed initial permit must be submitted by September 16, 2013 to **DAVID WARNER, DIRECTOR OF PERMIT SERVICES, SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT, 4800 ENTERPRISE WAY, MODESTO, CA 95356-8718.**

**SAN JOAQUIN VALLEY  
AIR POLLUTION CONTROL DISTRICT**

**Proposed Title V Permit Renewal Evaluation  
QG, LLC  
N-1646**

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**TITLE V PERMIT RENEWAL EVALUATION**  
**Commercial Printing**

**Engineer:** Kai Chan  
**Date:** August 7, 2013

**Facility Number:** N-1646  
**Facility Name:** QG, LLC  
**Mailing Address:** N61 W23044 Harry's Way  
Sussex, WI 53089-3995

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

**Responsible Official:** Thomas Estock  
**Title:** Director-Environmental Management

**Project # :** N-1130565  
**Deemed Complete:** March 19, 2013

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**I. PROPOSAL**

QG, LLC was issued a Title V permit renewal on September 1, 2010. As required by District Rule 2520, the applicant is requesting a permit renewal. The existing Title V permit shall be reviewed and modified to reflect all applicable District and federal rules updated, removed, or added since the issuance of the initial Title V permit.

The purpose of this evaluation is to provide the legal and factual basis for all updated applicable requirements and to determine if the facility will comply with these updated requirements. It also specifically identifies all additions, deletions, and/or changes made to permit conditions or equipment descriptions.

**II. FACILITY LOCATION**

QG, LLC is located at 2201 Cooper Avenue in Merced, CA.

### III. EQUIPMENT LISTING

A detailed facility printout listing all permitted equipment at the facility is included as Attachment C.

### IV. GENERAL PERMIT TEMPLATE USAGE

The applicant is requesting to use the following model general permit Template:

#### **Template SJV-UM-0-3 Facility Wide Umbrella**

The applicant has requested to utilize template No. SJV-UM-0-3, Facility Wide Umbrella. Based on the information submitted in the Template Qualification Form, the applicant qualifies for the use of this template.

The following applicable requirements have been addressed by the general permit facility wide umbrella Template SJV-UM-03 and will not be discussed in this document:

- District Rule 1100, Equipment Breakdown  
(amended December 17, 1992)
- District Rule 1160, Emission Statements  
(adopted November 18, 1992)
- District Rule 2010, Permits Required  
(amended December 17, 1992)
- District Rule 2020, Exemptions  
(amended March 21, 2002 ⇒ amended December 20, 2007)
- District Rule 2031, Transfer of Permits  
(amended December 17, 1992)
- District Rule 2040, Applications  
(amended December 17, 1992)
- District Rule 2070, Standards for Granting Applications  
(amended December 17, 1992)
- District Rule 2080, Conditional Approval  
(amended December 17, 1992)

- District Rule 2520, Federally Mandated Operating Permits  
(amended June 21, 2001)
- District Rule 4101, Visible Emissions  
(amended November 15, 2001 ⇒ amended February 17, 2005)
- District Rule 4601, Architectural Coatings  
(amended October 31, 2001 ⇒ amended December 17, 2009)
- District Rule 8021, Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities  
(adopted November 15, 2001 ⇒ amended August 19, 2004)
- District Rule 8031, Bulk Materials  
(adopted November 15, 2001 ⇒ amended August 19, 2004)
- District Rule 8041, Carryout and Trackout  
(adopted November 15, 2001 ⇒ amended August 19, 2004)
- District Rule 8051, Open Areas  
(adopted November 15, 2001 ⇒ amended August 19, 2004)
- District Rule 8061, Paved and Unpaved Roads  
(adopted November 15, 2001 ⇒ amended August 19, 2004)
- District Rule 8071, Unpaved Vehicle/Equipment Traffic Areas  
(adopted November 15, 2001 ⇒ amended September 16, 2004)
- 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos  
(amended July 20, 2004)
- 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners  
(amended June 18, 2008)
- 40 CFR Part 82, Subpart F, Recycling and Emissions Reduction  
(amended June 18, 2008)

## V. SCOPE OF EPA AND PUBLIC REVIEW

Certain segments of the proposed Renewed Operating Permit are based on model general permit templates that have been previously subject to EPA and public review. The terms and conditions from the model general permit templates are included in the proposed permit and are not subject to further EPA and public review.

For permit applications utilizing model general permit templates, public and agency comments on the District's proposed actions are limited to the applicant's eligibility for model general permit template, applicable requirements not covered by the model general permit template, and the applicable procedural requirements for issuance of Title V Operating Permits.

The following permit conditions, including their underlying applicable requirements, originate from model general permit templates and are not subject to further EPA or public review.

Conditions 1-45 of the facility-wide requirements N-1646-0-2 have been subsumed by conditions 1-45 of the facility-wide requirements N-1646-0-3.

## VI. FEDERALLY ENFORCEABLE REQUIREMENTS NOT ADDRESSED BY THE MODEL GENERAL PERMIT TEMPLATE

### A. Rules Updated

- District Rule 2201, New and Modified Stationary Source Review Rule (amended December 18, 2008 ⇒ amended April 21, 2011)
- District Rule 4702, Internal Combustion Engines (adopted August 21, 2003, amended January 18, 2007 - SIP Approved ⇒ amended August 18, 2011)
- 40 CFR Part 63, Subpart KK, National Emission Standards for the Printing and Publishing Industry (amended April 21, 2011)
- 40 CFR Part 63, Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (amended January 30, 2013)

## **B. Rules Removed**

No rules have been removed.

## **C. Rules Added**

- District Rule 2410, Prevention of Significant Deterioration  
(adopted June 16, 2011 ⇒ effective November 26, 2012)
- 40 CFR Part 60, Subpart IIII, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines  
(amended June 28, 2011)

## **D. Rules Not Updated**

- District Rule 1080, Stack Monitoring  
(amended December 17, 1992)
- District Rule 1081, Source Sampling  
(amended December 16, 1993)
- District Rule 4201, Particulate Matter Concentration  
(amended December 17, 1992)
- District Rule 4202, Particulate Matter - Emission Rate  
(amended December 17, 1992)
- District Rule 4301, Fuel Burning Equipment  
(amended December 17, 1992)
- District Rule 4309, Dryers, Dehydrators, and Ovens  
(adopted December 15, 2005)
- District Rule 4607, Graphic Arts and Paper, Film, Foil, and Fabric Coatings  
(amended December 18, 2008)
- District Rule 4701, Internal Combustion Engines, Phase 1  
(amended August 21, 2003)



- District Rule 4801, Sulfur Compounds<sup>(1)</sup>  
(amended December 17, 1992)
- 40 CFR Part 64, Compliance Assurance Monitoring (CAM)  
(amended October 22, 1997)

## VII. REQUIREMENTS NOT FEDERALLY ENFORCEABLE

For each Title V source, the District issues a single permit that contains the Federally Enforceable requirements, as well as the District-only requirements. The District-only requirements are not a part of the Title V Operating Permits. The terms and conditions that are part of the facility's Title V permit are designated as "Federally Enforceable Through Title V Permit".

For this facility, the following are not federally enforceable and will not be discussed in further detail:

### A. Rules Updated

- 17 CCR § 93115, California Code of Regulations, Title 17, Division 3, Charter 1, Subchapter 7.5, Measure 93115  
(amended May 19, 2011)

Permit N-1646-34-2 is subject to this rule. However, the amendments to this rule did not require any changes to the current conditions on this permit and no further discussion is required.

### B. Rules Added

No rules have been added.

### C. Rules Not Updated

- District Rule 1070, Inspections  
(amended December 17, 1992)
- District Rule 4102, Nuisance  
(amended December 17, 1992)

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<sup>1</sup> This rule is federally enforceable since it is based on the San Joaquin County Rule 407, which was approved in their SIP on 12/05/1984.

## VIII. PERMIT REQUIREMENTS

The purpose of this evaluation is to review changes to federally enforceable requirements; therefore, this compliance section will only address rules that have been amended or added since the issuance of the initial Title V permit.

### A. District Rule 2201 - New and Modified Stationary Source Review Rule

District Rule 2201 was amended on April 21, 2011, after this facility's Title V permit was last renewed. This Title V permit renewal does not constitute a modification per section 3.25, defined as an action including at least one of the following items:

1. Any change in hours of operation, production rate, or method of operation of an existing emissions unit, which would necessitate a change in permit conditions.
2. Any structural change or addition to an existing emissions unit which would necessitate a change in permit conditions. Routine replacement shall not be considered to be a structural change.
3. An increase in emissions from an emissions unit caused by a modification of the Stationary Source when the emissions unit is not subject to a daily emissions limitation.
4. Addition of any new emissions unit which is subject to District permitting requirements.
5. A change in a permit term or condition proposed by an applicant to obtain an exemption from an applicable requirement to which the source would otherwise be subject.

Therefore, the updated requirements of this rule are not applicable at this time.

### B. District Rule 2410 – Prevention of Significant Deterioration (PSD)

This rule was added on June 16, 2011 and became effective on November 26, 2012. This Title V renewal is not a PSD modification; therefore, it is not necessary to update the permits to address this rule.

### C. District Rule 2520 – Federally Mandated Operating Permits

The purpose of this rule include: providing an administrative mechanism for issuing, renewing, revising, and revoking operating permit sources of air contaminants in accordance with requirements of 40 CFR Part 70 and providing an administrative mechanism for incorporating New and Modified Source Review (NSR) requirements into a Part 70 permit.

There are no federally applicable Greenhouse Gas (GHG) requirements for this source. It should be noted that the Mandatory Greenhouse Gas Reporting rule (40 CFR Part 98) is not included in the definition of an applicable requirement within Title V (per 40 CFR 71.2). Therefore, there will be no further discussion of GHG in this evaluation.

**D. District Rule 4702 – Internal Combustion Engines**  
**(Version August 18, 2011 – Not SIP Approved)**

The purpose of this rule is to limit the emissions of nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), volatile organic compounds (VOC), and sulfur oxides (SO<sub>x</sub>) from internal combustion engines. This rule applies to any internal combustion engine rated at 25 brake horsepower or greater.

Permit Number N-1646-34-2 (235 bhp Detroit Diesel Model 1044-7312 Diesel-Fired Emergency IC Engine Powering a Fire Pump):

**Section 4.0, Exemptions:**

Pursuant to Section 4.2, except for the requirements of Sections 5.9 and 6.3.2, the requirements of this rule shall not apply to an emergency standby or a low-use engine, provided that the engine is operated with an operating nonresettable elapsed time meter.

Pursuant to Section 4.3 and 4.3.1, except for the administrative requirements of Section 6.2.3, the requirements of this rule shall not apply to an internal combustion engine that meets the following conditions:

- The engine is operated exclusively to preserve or protect property, human life, or public health during a disaster or state of emergency, such as a fire or flood (§4.3.1.1); and
- Except for operations associated with Section 4.3.1.1, the engine is limited to operate no more than 100 hours per calendar year as determined by an operational nonresettable elapsed operating time meter, for periodic maintenance, periodic readiness testing, and readiness testing during and after repair work of the engine (§4.3.1.2), and
- The engine is operated with a nonresettable elapsed time meter. In lieu of installing a nonresettable elapsed time meter, the operator of an engine may use an alternative device, method, or technique, in determining operating time provided that the alternative is approved by the APCO and EPA. The operator of the engine shall properly maintain and operate the nonresettable elapsed time meter or alternative device in accordance with the manufacturer's instructions (§4.3.1.3).

The IC engine under permit N-1646-34-2 is only used to power an emergency fire pump, which meets the above listed conditions under Sections 4.2 and 4.3.1. The following table outlines the requirements along with the permit conditions to ensure compliance with this rule for this unit:

<b>District Rule 4702 Requirements for Emergency Standby IC Engines</b>	<b>Permit Condition Numbers for Compliance with District Rule 4702 Requirements</b>
The owner/operator must operate and maintain the engine(s) and any installed control devices according to the manufacturers written instructions.	Permit condition 1. of draft Permit to Operate N-1646-34-2.
Operation of emergency standby engines is limited to 100 hours or less per calendar year for non-emergency purposes, verified through the use of a non-resettable elapsed operating time meter.	Permit conditions 3. and 4. of draft Permit to Operate N-1646-34-2.
Emergency standby engines cannot be used to reduce the demand for electrical power when normal electrical power line service has not failed, or to produce power for the electrical distribution system, or in conjunction with a voluntary utility demand reduction program or interruptible power contract.	Permit conditions 5. and 6. of draft Permit to Operate N-1646-34-2.
The owner/operator must monitor the operational characteristics of each engine as recommended by the engine manufacturer or emission control system supplier.	Permit condition 7. of draft Permit to Operate N-1646-34-2.
Records of the total hours of operation of the emergency standby engine, type of fuel used, purpose for operating the engine, all hours of non-emergency and emergency operation, and support documentation must be maintained. All records shall be retained for a period of at least five years, shall be readily available, and be made available to the APCO upon request.	Permit condition 8. and 10. of draft Permit to Operate N-1646-34-2.

**E. District Rule 4702 – Internal Combustion Engines**  
**(Version January 18, 2007 – SIP Approved)**

The purpose of this rule is to limit the emissions of nitrogen oxides (NOx), carbon monoxide (CO), volatile organic compounds (VOC), and sulfur oxides (SOx) from internal combustion engines.

This rule applies to any internal combustion engine with a rated brake horsepower greater than 50 horsepower.

Permit Number N-1646-34-2 (235 bhp Detroit Diesel Model 1044-7312 Diesel-Fired Emergency IC Engine Powering a Fire Pump):

This permit unit is an emergency IC engine used to power a fire pump which meets the conditions listed in Sections 4.2, 4.3.1 and is only subject to the requirements of Sections 5.7 and 6.2.3 of the SIP-approved version of this rule. In regards to Sections 4.2, 4.3.1 and 6.2.3 there were only minor language changes with equivalent conditions and requirements between the latest version and SIP-approved versions of this rule. Therefore, compliance with the new version of this rule satisfies the requirements of the older SIP-approved version.

**F. 40 CFR Part 60, Subpart IIII, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines**

Per §60.4200(a)(2) of 40 CFR Part 60 Subpart IIII, this subpart applies to owners and operators of stationary compression ignition (CI) internal combustion engines (ICE) that commence construction after July 11, 2005, where the stationary CI ICE are manufactured after April 1, 2006, and are not fire pump engines, or manufactured as a certified National Fire Protection Association (NFPA) fire pump engine after July 1, 2006. §60.4200(a)(3) states that this subpart also applies to owners and operators of any stationary CI ICE that are modified or reconstructed after July 11, 2005.

Permit Number N-1646-34-2 (235 bhp Detroit Diesel Model 1044-7312 Diesel-Fired Emergency IC Engine Powering a Fire Pump):

This unit was manufactured before July 11, 2005 and has not been modified or reconstructed after July 11, 2005. Therefore, this unit is not subject to this subpart.

**G. 40 CFR Part 63, Subpart KK, National Emission Standards for the Printing and Publishing Industry**

According to §63.820(a)(1) (Applicability), Subpart KK applies to each new and existing facility that is a major source of hazardous air pollutants (HAP), as defined in 40 CFR 63.2, at which publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing presses are operated.

This facility does not operate a publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing presses. Therefore, this facility is not subject to this subpart.

**H. 40 CFR Part 63, Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants (HAP) for Stationary Reciprocating Internal Combustion Engines**

Per §63.6585(b) and §63.6585(c) of 40 CFR Part 63 Subpart ZZZZ, this subpart applies to owners and operators of stationary reciprocating internal combustion engines (RICE) operated at a major or area source of Hazardous Air Pollutant (HAP) emissions. A major source of HAP emissions is a facility that has the potential to emit any single HAP at a rate of 10 tons/year or greater or any combinations of HAPs at a rate of 25 tons/year or greater. An area source of HAP emissions is a facility that is not a major source of HAP emissions. As previously determined under project #N-1123782, this facility is an area source of HAP emissions.

**Permit Number N-1646-34-2 (235 bhp Detroit Diesel Model 1044-7312 Diesel-Fired Emergency IC Engine Powering a Fire Pump):**

Per §63.6590(a) an affected source is any existing, new, or reconstructed stationary RICE located at a major or area source of HAP emissions. Per §63.6590(a)(1)(iii), a stationary RICE located at an area source of HAP emissions is existing if the owner or operator commenced construction or reconstruction of the stationary RICE before June 12, 2006. This facility is an area source of HAP emissions and this unit was constructed before June 12, 2006. Therefore, this unit is considered to be an existing unit located at an area source of HAP emissions and is subject to this subpart.

The following table outlines the requirements along with the permit conditions to ensure compliance for this existing emergency compression ignited engine located at an areas source of HAP emissions:

40 CFR Part 63 Subpart ZZZZ Requirements	Permit Condition Numbers for Compliance with Subpart ZZZZ Requirements
<p>40 CFR 63.6603(a) requires the owner or operator of an existing stationary RICE located at an area source of HPA emissions to comply with the applicable requirements in Table 2d and the operating limitations of Table 2b. The following are the applicable requirements from these tables for emergency compression ignited engines:</p> <ul style="list-style-type: none"> <li>• Change the oil and filter every 500 hours of operation, or annually, whichever comes first;</li> <li>• Inspect the air cleaner every 1,000 hours of operation, or annually, whichever comes first, and replace as necessary; and</li> <li>• Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.</li> </ul>	<p>Permit condition 1. of draft Permit to Operate N-1646-34-2.</p>

40 CFR Part 63 Subpart ZZZZ Requirements	Permit Condition Numbers for Compliance with Subpart ZZZZ Requirements
40 CFR 63.6625(f) requires that existing emergency engines operated at an area source of HAPs be equipped with a non-resettable hour meter if one is not already installed.	Permit condition 3. of draft Permit to Operate N-1646-34-2.
40 CFR 63.6640(f)(2) and (f)(2)(i) allows emergency stationary RICE to operate for a maximum of 100 hours per calendar year for maintenance and readiness testing.	Permit condition 4. of draft Permit to Operate N-1646-34-2.
40 CFR 63.6655(e) requires records be kept to demonstrate compliance with the maintenance and operating requirements of this subpart.	Permit condition 8. of draft Permit to Operate N-1646-34-2.

**I. 40 CFR Part 64, Compliance Assurance Monitoring (CAM)**

40 CFR Part 64 requires Compliance Assurance Monitoring (CAM) for units that meet the following three criteria:

1. The unit must have an emission limit for the pollutant;
2. The unit must have add-on controls for the pollutant (these are devices such as flue gas recirculation (FGR), baghouses, and catalytic oxidizers); and
3. The unit must have a pre-control potential to emit of greater than the major source thresholds.

Major Source Thresholds		
Pollutant	lb/year	ton/year
NOx	20,000	10
SOx	140,000	70
PM10	140,000	70
CO	200,000	100
VOC	20,000	10

Permit Number N-1646-2-5: Paper Scrap Handling System serving the Paper Slitters on Printing Press #524 and #531, Inserter Binderies #733, #734, #735, #737, #738, and #739, and Binderies #760, #761, #762, #763, #764, and #765. The Paper Scrap from all these units is conveyed pneumatically to Five Maren Balers (A, B, C, D and E) each served by its own Sock Filter System.

Permit Number N-1646-19-6: Paper Slitting System serving Printing Press #520 and Two Harris Model RG321 Binder Saws (Binders #713 and #714). The Paper Scrap from these units is conveyed pneumatically to a Bale Master Baler served by a Mac Model 44RPT 280 Baghouse System.

A CAM requirement determination for these permit units were performed during the last Title V renewal under Project #N-1083761 and CAM requirements were not triggered for PM<sub>10</sub> emissions. There have not been any changes to the processing equipment, control equipment, emission limits, or major source threshold for PM<sub>10</sub> emissions since the last modifications to these permit units. Therefore, these permit units continue to not trigger CAM requirements for PM<sub>10</sub> emissions.

Permit Number N-1646-34-2: 235 HP Detroit Diesel Model 1044-7312 Diesel-Fired Emergency IC Engine Powering a Fire Pump.

This permit unit does not contain emission limitations for any pollutant. Therefore, this permit unit is not subject to CAM requirements for any pollutant.

Permit Number N-1646-6-6: Graphic Arts Printing Operation consisting of One Harris Model 1000B Heatset Offset Lithographic Printing Press #514 served by Two Tec Natural Gas Fired Drying Ovens (Total of 1.4 MMBtu/hr) all vented to the 9.5 MMBtu/hr Meg Tec Enterprise II or 18 MMBtu/hr Reeco Retherm Model E Regenerative Thermal Oxidizers.

Permit Number N-1646-16-6: Graphic Arts Printing Operation consisting of One Harris Model 1000 Heatset Offset Lithographic Printing Press #517 served by Two Tec Natural Gas Fired Drying Ovens (Total of 1.366 MMBtu/hr) all vented to the 9.5 MMBtu/hr Meg Tec Enterprise II or 18 MMBtu/hr Reeco Retherm Model E Regenerative Thermal Oxidizers.

Permit Number N-1646-23-6: Graphic Arts Printing Operation consisting of One Heidelberg Harris Model M-1000B Heatset Offset Lithographic Printing Press #519 served by One 9.5 MMBtu/hr Thermal Electron Model A3406E Natural Gas Fired Drying Oven vented to the 9.5 MMBtu/hr Meg Tec Enterprise II or 18 MMBtu/hr Reeco Retherm Model E Regenerative Thermal Oxidizers.



Permit Number N-1646-25-5: Graphic Arts Printing Operation consisting of One Koenig & Bauer Commander Heatset Offset Lithographic Printing Press (Press #508) and One 31.5 MMBtu/hr (3 Burners @ 10.5 MMBtu/hr Each) Natural Gas Fired Meg Tec Model Dual Dry III 119 Drying Oven served by the 9.5 MMBtu/hr Meg Tec Enterprise II or 18 MMBtu/hr Reeco Retherm Model E Regenerative Thermal Oxidizers.

Permit Number N-1646-36-5: Graphic Arts Printing Operation consisting of One Roland Model Rotoman S 57.5" Wide 8-Color Heatset Offset Lithographic Printing Press (Press #520) and Two 9.9 MMBtu/hr Natural Gas Fired Meg Tec Model DD III-135 Drying Ovens (Each consists of an 8.4 MMBtu/hr Maxon Ovenpak 400 Burner and a 1.5 MMBtu/hr Maxon APX Burner) served by the shared 9.5 MMBtu/hr Meg Tec Enterprise II or 18 MMBtu/hr Reeco Retherm Model E Regenerative Thermal Oxidizers.

Permit Number N-1646-38-6: Graphic Arts Printing Operation consisting of One Roland Model Rotoman S 64" Wide 8-Color Heatset Offset Lithographic Printing Press (Press #523) with One 9.4 MMBtu/hr Natural Gas Fired Meg Tec Model DD III-13-2080 Drying Oven #1 and One 9.0 MMBtu/hr Natural Gas Fired Model DD III-2080 Drying Oven #2 (with Maxon Low NOx Burners) each served by the shared 9.5 MMBtu/hr Meg Tec Enterprise II or 18 MMBtu/hr Reeco Retherm Model E Regenerative Thermal Oxidizers.

Permit Number N-1646-39-7: 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 Meg Tec 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.

A CAM requirement determination for these permit units were performed during the last Title V renewal under Project #N-1083761 and CAM requirements were triggered only for VOC. Permit modifications made on these permit units after the issuance of the prior renewed Title V operating permits have not invalidated or changed the CAM requirements on these existing permits. Therefore, the CAM requirements on the current permits will be retained on the proposed permits to ensure compliance with CAM. Compliance with the CAM requirements will be ensured with the listed permit conditions for these permits in the table below:

Permit Number	Permit Condition Number
N-1646-6-6	6., 7., 33., 34., 35., & 36.
N-1646-23-6	6., 7., 44., 45., 46., & 47.
N-1646-25-5	6., 7., 44., 45., 46., & 47.
N-1646-36-5	8., 9., 48., 49., 50., & 51.
N-1646-38-6	48., 49., 50., 51., 52., & 53.
N-1646-39-7	39., 40., 41., 42., 43., & 44.

Permit Number N-1646-37-4: Graphic Arts Printing Operation consisting of One Roland Model Rotoman S 64" Wide 8-Color Heatset Offset Lithographic Printing Press (Press #522) with One 9.4 MMBtu/hr Natural Gas Fired Meg Tec Model DD III-135-2080 Drying Oven #1 and One 9.0 MMBtu/hr Natural Gas Fired Meg Tec Model DD III-2080 Drying Oven #2 each vented to the shared 5.728 MMBtu/hr Meg Tec Cleanswitch Model CS-300-95 Natural Gas Fired Regenerative Thermal Oxidizer.

This permit contains NO<sub>x</sub>, CO, VOC, PM<sub>10</sub>, and SO<sub>x</sub> emission limits and is served by a regenerative thermal oxidizer (RTO). The RTO is an add-on control device only for CO and VOC. Therefore, the emission units may be subject to CAM requirements for CO and VOC.

Pursuant to the application review under District Projects #N-1122453 and N-1072192, the uncontrolled CO emissions rate from the emission units served by the RTO is 0.276 lb/MMBtu with an annual heat input rate limit of 50,000 MMBtu/year. Therefore, the uncontrolled CO emissions are calculated as follows:

$$\begin{aligned} \text{Uncontrolled CO Emissions} &= 0.276 \text{ lb/MMBtu} \times 50,000 \text{ MMBtu/year} \\ &= 13,800 \text{ lb-CO/year} \end{aligned}$$

This unit is not subject to CAM for CO emissions because the pre-control CO potential to emit is less than the major source threshold of 200,000 pounds CO/year.

Pursuant to the application review under District Project #N-1122453, the controlled VOC emissions from the emission units served by the RTO are 35,133 lb-VOC/year. Therefore, the pre-control potential to emit will be greater than the major source threshold for VOC emissions of 20,000 lb/year and this unit is subject to CAM for VOC emissions.

For units that are subject to CAM, 40 CFR Part 64.3 requires that the operator monitor one or more parameters that indicate the performance of the control device. For this permit, monitoring of the operating temperature of RTO will be used as an indicator of proper operation of the control device.

40 CFR Part 4.3 also requires that variability be considered in establishing data collection frequency. For most units, at least some data must be collected once every 24 hours. For units with potential to emit in excess of major source thresholds after the control device, data must generally be collected every 15 minutes. Since the potential to emit after the control device is greater than the major source threshold, monitoring of the operating temperature of the RTO will be required at least once every 15 minutes. The RTO serving this permit unit is equipped with a continuous temperature monitoring and recording instrument. Compliance with the CAM requirements will be ensured with the listed permit conditions for this permit in the table below:

Permit Number	Permit Condition Number
N-1646-37-4	9., 10., 51., 52., & 53.

## IX. PERMIT SHIELD

A permit shield legally protects a facility from enforcement of the shielded regulations when a source is in compliance with the terms and conditions of the Title V permit. Compliance with the terms and conditions of the Operating Permit is considered compliance with all applicable requirements upon which those conditions are based, including those that have been subsumed.

### A. Requirements Addressed by Model General Permit Templates

#### 1. Model General Permit Template SJV-UM-0-3

By submitting Model General Permit Template SJV-UM-0-3 qualification form, the applicant has requested that a permit shield be granted for all the applicable requirements identified by the template. Therefore, the permit shields as granted in Model General Permit Template are included as conditions 43. and 44. of the facility-wide requirements (N-1646-0-4).

### B. Requirements not Addressed by Model General Permit Templates

The applicant is not requesting a new permit shield for any other rule requirements; therefore, no other requirements are proposed.

**X. PERMIT CONDITIONS**

See Attachment A - Draft Renewed Title V Operating Permit

**XI. ATTACHMENTS**

- A. Draft Renewed Title V Operating Permit
- B. Previous Title V Operating Permit
- C. Detailed Facility List

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# ATTACHMENT A

Draft Renewed Title V Operating Permit

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# San Joaquin Valley Air Pollution Control District

FACILITY: N-1646-0-3

EXPIRATION DATE: 09/30/2013

## FACILITY-WIDE REQUIREMENTS

1. {98} 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 Rule 2201] Federally Enforceable Through Title V Permit
4. Total NOx 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 each regenerative thermal oxidizer shall be maintained on the premises. [District Rule 2201] 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. {2287} 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. {2289} 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. {2290} A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District. [District Rule 2031] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

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

Facility Name: QG, LLC

Location: 2201 COOPER AVE, MERCED, CA 95348

11. {2291} Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District. [District Rule 2040] Federally Enforceable Through Title V Permit
12. {2292} 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. {2293} 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. {2294} 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. {2295} 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. {2296} 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. {2297} 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. {2298} 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. {2299} 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. {2300} 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. {2301} 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. {2302} 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. {2303} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.13.2.2] Federally Enforceable Through Title V Permit

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

24. {2304} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520, 9.13.2.3] Federally Enforceable Through Title V Permit
25. {2305} 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. {2310} 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. {2311} 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. {2312} 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

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



38. Any unpaved vehicle/equipment area that anticipates more than 75 vehicle trips per day shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 100 vehicle trips per day shall comply with the requirements of Section 5.1.2 of District Rule 8071. All sources shall comply with the requirements of Section 5.0 of District Rule 8071 unless specifically exempted under Section 4.0 of Rule 8071 (9/16/04) or Rule 8011 (8/19/04). [District Rule 8071 and Rule 8011] Federally Enforceable Through Title V Permit
39. {2319} 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. {2320} 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. {2321} 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. {2322} 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

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

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# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-1646-2-5

**EXPIRATION DATE:** 09/30/2013

**EQUIPMENT DESCRIPTION:**

PAPER SCRAP HANDLING SYSTEM SERVING THE PAPER SLITTERS ON PRINTING PRESS #524 & #531, INSERTER BINDERIES #733, #734, #735, #737, #738 AND #739 AND THE BINDERIES #760, #761, #762, #763, #764 AND #765. THE PAPER SCRAP FROM ALL THESE UNITS IS CONVEYED PNEUMATICALLY TO FIVE MAREN BALERS (A, B, C, D AND E) EACH SERVED BY ITS OWN SOCK FILTER SYSTEM

## PERMIT UNIT REQUIREMENTS

1. All ducting and control equipment shall be in good working order to prevent fugitive particulate emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
2. A spare set of sock filters shall be maintained on the premises at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Visible emissions from each sock filter serving the baler shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Material removed from sock filters shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
5. PM10 emissions from each sock filter system exhaust shall not exceed 0.00234 pounds per ton of total scrap material collected by the Maren balers. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The combined amount of scrap material collected by the Maren balers shall not exceed 43 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Each sock filters shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
8. Records of dust collector system maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
9. The permittee shall maintain daily records of the amount of scrap collected by the Maren balers (tons/day). [District Rule 2201] Federally Enforceable Through Title V Permit
10. All records shall be retained for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-1646-6-6

**EXPIRATION DATE:** 09/30/2013

**EQUIPMENT DESCRIPTION:**

GRAPHIC ARTS PRINTING OPERATION CONSISTING OF ONE HARRIS MODEL 1000B HEATSET-OFFSET LITHOGRAPHIC PRINTING PRESS #514 SERVED BY TWO TEC NATURAL GAS FIRED DRYING OVENS (TOTAL OF 1.4 MMBTU/HR) ALL VENTED TO THE 9.5 MMBTU/HR MEG TEC ENTERPRISE II OR 18 MMBTU/HR REECO RETHERM MODEL E REGENERATIVE THERMAL OXIDIZERS

## PERMIT UNIT REQUIREMENTS

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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 ovens and regenerative thermal oxidizers shall be fired exclusively on natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The drying oven 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 dryer is being air purged. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The collection system for the dryer exhaust and for all fugitive VOC emissions shall have a minimum capture efficiency of 90%. [District Rules 2201 and 4607, 5.6] Federally Enforceable Through Title V Permit
5. Each thermal oxidizer shall be operated with a minimum VOC destruction efficiency of 98%. [District Rules 2201 and 4607, 5.6] Federally Enforceable Through Title V Permit
6. Each thermal oxidizer shall be equipped with an operational continuous temperature monitoring and recording instrument. [District , Rules 2201, 2520, 9.3.2, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
7. Each thermal oxidizer shall be operated at a minimum temp. of 1400 deg. F. The incinerator shall be preheated to 1400 deg. F prior to the start-up of the heatset offset printing operation. [District Rules 2201, 2520, 9.3.2, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
8. 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
9. For a permittee using any solvent containing more than 25 g/L (0.21 lb/gal) of VOC for organic solvent cleaning, cleaning activities shall be by one of the following methods: (1) wipe cleaning; or (2) application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force; or (3) non-atomized solvent flow method in which the cleaning solvent is collected in a container or a collection system which is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container; or (4) solvent flushing method in which the cleaning solvent is discharged into a container that is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container. The discharged solvent from the equipment must be collected into containers without atomizing into the open air. The solvent may be flushed through the system by air or hydraulic pressure, or by pumping. [District Rule 4607, 5.8.3] 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, 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
11. For a permittee using any solvent containing more than 25 g/L (0.21 lb/gal) of VOC for organic solvent cleaning, the permittee shall not use VOC-containing material to clean spray equipment used for the application of coatings, adhesives, or ink, unless an enclosed system or equipment that is proven to be equally effective at controlling emissions is used for cleaning. If an enclosed system is used, it must totally enclose spray guns, cups, nozzles, bowls, and other parts during washing, rinsing, draining procedures, and it must be used according to manufacturer's recommendations and must be closed when not in use. [District Rule 4607, 5.8.5] Federally Enforceable Through Title V Permit
12. 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
13. 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
14. The Volatile Organic Compound (VOC) content of the printing inks as applied (excluding water and exempt compounds) shall be less than 45% by weight and the VOC content of the fountain solutions shall be less than 15% by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
15. VOC emissions from the printing inks and solvents shall not exceed 37.5 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
16. NO<sub>x</sub> emissions from the drying oven shall not exceed 4.3 ppmvd @ 19% O<sub>2</sub> (referenced as NO<sub>2</sub>). [District Rule 2201] Federally Enforceable Through Title V Permit
17. CO emissions from the drying oven shall not exceed 25.0 ppmvd @ 19% O<sub>2</sub>. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Emissions from the drying oven shall not exceed any of the following limits: 0.00285 lb-SO<sub>x</sub>/MMBtu, 0.0076 lb-PM<sub>10</sub>/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
19. NO<sub>x</sub> emissions from the regenerative thermal oxidizers shall not exceed 4.3 ppmvd @ 19% O<sub>2</sub> (referenced as NO<sub>2</sub>). [District Rule 2201] Federally Enforceable Through Title V Permit
20. CO emissions from the regenerative thermal oxidizers shall not exceed 25.0 ppmvd @ 19% O<sub>2</sub>. [District Rule 2201] Federally Enforceable Through Title V Permit
21. Emissions from the regenerative thermal oxidizers shall not exceed any of the following limits: 0.00285 lb-SO<sub>x</sub>/MMBtu, 0.0076 lb-PM<sub>10</sub>/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
22. 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
23. 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
24. 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

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

25. 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
26. 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
27. 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
28. 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
29. 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
30. 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
31. 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
32. 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
33. Each thermal oxidizer shall be operated at a minimum temp. of 1400 deg. F. Upon determining an excursion from this requirement, the permittee shall investigate the excursion and take corrective action to minimize emissions and prevent recurrence of the excursion as expeditiously as practicable. [District Rule 2520, 9.3.2 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
34. 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
35. 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
36. If the District or EPA determine that a Quality improvement plan is required under 40 CFR part 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64.8. [40 CFR Part 64] Federally Enforceable Through Title V Permit

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

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# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-1646-16-6

**EXPIRATION DATE:** 09/30/2013

**EQUIPMENT DESCRIPTION:**

GRAPHIC ARTS PRINTING OPERATION CONSISTING OF ONE HARRIS MODEL 1000 HEATSET OFFSET LITHOGRAPHIC PRINTING PRESS #517 SERVED BY TWO TEC NATURAL GAS FIRED DRYING OVENS (TOTAL OF 1.366 MMBTU/HR) ALL VENTED TO THE 9.5 MMBTU/HR MEG TEC ENTERPRISE II OR 18 MMBTU/HR REECO RETHERM MODEL E REGENERATIVE THERMAL OXIDIZERS

## PERMIT UNIT REQUIREMENTS

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The drying ovens and regenerative thermal oxidizers shall be fired exclusively on natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The drying oven 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 dryer is being air purged. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The collection system for the dryer exhaust and for all fugitive VOC emissions shall have a minimum capture efficiency of 90%. [District Rules 2201 and 4607, 5.6] Federally Enforceable Through Title V Permit
5. Each thermal oxidizer shall be operated with a minimum VOC destruction efficiency of 98%. [District Rules 2201 and 4607, 5.6] Federally Enforceable Through Title V Permit
6. Each thermal oxidizer shall be equipped with an operational continuous temperature monitoring and recording instrument. [District , Rules 2201, 2520, 9.3.2, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
7. Each thermal oxidizer shall be operated at a minimum temp. of 1400 deg. F. The incinerator shall be preheated to 1400 deg. F prior to the start-up of the heatset offset printing operation. [District Rules 2201, 2520, 9.3.2, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
8. 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
9. For a permittee using any solvent containing more than 25 g/L (0.21 lb/gal) of VOC for organic solvent cleaning, cleaning activities shall be by one of the following methods: (1) wipe cleaning; or (2) application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force; or (3) non-atomized solvent flow method in which the cleaning solvent is collected in a container or a collection system which is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container; or (4) solvent flushing method in which the cleaning solvent is discharged into a container that is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container. The discharged solvent from the equipment must be collected into containers without atomizing into the open air. The solvent may be flushed through the system by air or hydraulic pressure, or by pumping. [District Rule 4607, 5.8.3] 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, 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
11. For a permittee using any solvent containing more than 25 g/L (0.21 lb/gal) of VOC for organic solvent cleaning, the permittee shall not use VOC-containing material to clean spray equipment used for the application of coatings, adhesives, or ink, unless an enclosed system or equipment that is proven to be equally effective at controlling emissions is used for cleaning. If an enclosed system is used, it must totally enclose spray guns, cups, nozzles, bowls, and other parts during washing, rinsing, draining procedures, and it must be used according to manufacturer's recommendations and must be closed when not in use. [District Rule 4607, 5.8.5] Federally Enforceable Through Title V Permit
12. 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
13. 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
14. The Volatile Organic Compound (VOC) content of the printing inks as applied (excluding water and exempt compounds) shall be less than 45% by weight and the VOC content of the fountain solutions shall be less than 15% by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
15. VOC emissions from the printing inks and solvents shall not exceed 27 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
16. NO<sub>x</sub> emissions from the drying oven shall not exceed 4.3 ppmvd @ 19% O<sub>2</sub> (referenced as NO<sub>2</sub>). [District Rule 2201] Federally Enforceable Through Title V Permit
17. CO emissions from the drying oven shall not exceed 25.0 ppmvd @ 19% O<sub>2</sub>. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Emissions from the drying oven shall not exceed any of the following limits: 0.00285 lb-SO<sub>x</sub>/MMBtu, 0.0076 lb-PM<sub>10</sub>/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
19. NO<sub>x</sub> emissions from the regenerative thermal oxidizers shall not exceed 4.3 ppmvd @ 19% O<sub>2</sub> (referenced as NO<sub>2</sub>). [District Rule 2201] Federally Enforceable Through Title V Permit
20. CO emissions from the regenerative thermal oxidizers shall not exceed 25.0 ppmvd @ 19% O<sub>2</sub>. [District Rule 2201] Federally Enforceable Through Title V Permit
21. Emissions from the regenerative thermal oxidizers shall not exceed any of the following limits: 0.00285 lb-SO<sub>x</sub>/MMBtu, 0.0076 lb-PM<sub>10</sub>/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
22. 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
23. 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
24. 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

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

25. 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
26. 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
27. 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
28. 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
29. 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
30. 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
31. 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
32. 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
33. Each thermal oxidizer shall be operated at a minimum temp. of 1400 deg. F. Upon determining an excursion from this requirement, the permittee shall investigate the excursion and take corrective action to minimize emissions and prevent recurrence of the excursion as expeditiously as practicable. [District Rule 2520, 9.3.2 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
34. 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
35. 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
36. If the District or EPA determine that a Quality improvement plan is required under 40 CFR part 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64.8. [40 CFR Part 64] Federally Enforceable Through Title V Permit

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

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# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-1646-19-6

**EXPIRATION DATE:** 09/30/2013

**EQUIPMENT DESCRIPTION:**

PAPER SLITTING SYSTEM SERVING PRINTING PRESSES #507 AND #520, AND TWO HARRIS MODEL RG321 BINDER SAWS (BINDERS #713 AND #714). THE PAPER SCRAP FROM THESE UNITS IS CONVEYED PNEUMATICALLY TO A BALE MASTER BALER SERVED BY A MAC MODEL 44RPT 280 BAGHOUSE SYSTEM

## PERMIT UNIT REQUIREMENTS

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1. All ducting and control equipment shall be in good working order to prevent fugitive particulate emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The baghouse exhaust fan(s) shall be in operation during paper scrap conveying operation. [District Rule 2201] Federally Enforceable Through Title V Permit
3. PM10 emissions from the Mac baghouse exhaust shall not exceed 0.000234 pounds per ton of total scrap material collected by the Bale Master baler. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The amount of scrap material collected by the Bale Master baler shall not exceed 2.4 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The baghouse shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The baghouse shall operate at all times with a minimum differential pressure of 1 inches water column and a maximum differential pressure of 6 inches water column. [District Rule 2201]
7. Replacement bags numbering at least 10% of the total number of bags in the largest baghouse using each type of bag shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Material removed from baghouse shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
10. There shall be no visible emissions from the dust control system. [District Rules 2201 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
11. Visible emissions from the baghouse shall be evaluated using EPA method 22 for a period of at least 6 minutes at least once during each day that the baghouse is operated. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
12. Dust collection system shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
13. Dust collector filters shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] 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.

14. Records of dust collector maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
15. The permittee shall maintain on a daily basis, records of visible emissions from the baghouse, the amount of scrap collected in tons/day, and pressure differential gauge reading. [District Rules 2201 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
16. All records shall be retained for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

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

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# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1646-23-6

EXPIRATION DATE: 09/30/2013

## EQUIPMENT DESCRIPTION:

GRAPHIC ARTS PRINTING OPERATION CONSISTING OF ONE HEIDELBERG HARRIS MODEL M-1000B HEATSET OFFSET PRINTING PRESS #519 SERVED BY ONE 9.5 MMBTU/HR THERMAL ELECTRON MODEL A3406E DRYING OVEN VENTED TO THE 9.5 MMBTU/HR MEG TEC ENTERPRISE II OR 18 MMBTU/HR REECO RETHERM MODEL E REGENERATIVE THERMAL OXIDIZERS

## PERMIT UNIT REQUIREMENTS

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The drying ovens and regenerative thermal oxidizers shall be fired exclusively on natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The drying ovens serving the heatset offset printing press shall be maintained under negative pressure and shall be vented through the 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
4. 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, 5.6] Federally Enforceable Through Title V Permit
5. Each regenerative thermal oxidizer shall be operated with a minimum VOC destruction efficiency of 98%. [District Rules 2201 and 4607, 5.6] Federally Enforceable Through Title V Permit
6. 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
7. 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
8. 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
9. For a permittee using any solvent containing more than 25 g/L (0.21 lb/gal) of VOC for organic solvent cleaning, cleaning activities shall be by one of the following methods: (1) wipe cleaning; or (2) application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force; or (3) non-atomized solvent flow method in which the cleaning solvent is collected in a container or a collection system which is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container; or (4) solvent flushing method in which the cleaning solvent is discharged into a container that is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container. The discharged solvent from the equipment must be collected into containers without atomizing into the open air. The solvent may be flushed through the system by air or hydraulic pressure, or by pumping. [District Rule 4607, 5.8.3] 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, 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
11. For a permittee using any solvent containing more than 25 g/L (0.21 lb/gal) of VOC for organic solvent cleaning, the permittee shall not use VOC-containing material to clean spray equipment used for the application of coatings, adhesives, or ink, unless an enclosed system or equipment that is proven to be equally effective at controlling emissions is used for cleaning. If an enclosed system is used, it must totally enclose spray guns, cups, nozzles, bowls, and other parts during washing, rinsing, draining procedures, and it must be used according to manufacturer's recommendations and must be closed when not in use. [District Rule 4607, 5.8.5] Federally Enforceable Through Title V Permit
12. 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
13. 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
14. The Volatile Organic Compound (VOC) content of the printing inks as applied (excluding water and exempt compounds) shall be less than 45% by weight and the VOC content of the fountain solutions shall be less than 15% by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
15. VOC emissions from the printing inks and solvents shall not exceed 37.5 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
16. NO<sub>x</sub> emissions from the drying oven shall not exceed 4.3 ppmvd @ 19% O<sub>2</sub> (referenced as NO<sub>2</sub>). [District Rules 2201 & 4309, 5.2] Federally Enforceable Through Title V Permit
17. CO emissions from the drying oven shall not exceed 25.0 ppmvd @ 19% O<sub>2</sub>. [District Rules 2201 & 4309, 5.2] Federally Enforceable Through Title V Permit
18. Emissions from the drying oven shall not exceed any of the following limits: 0.00285 lb-SO<sub>x</sub>/MMBtu, 0.0076 lb-PM<sub>10</sub>/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
19. NO<sub>x</sub> emissions from the regenerative thermal oxidizers shall not exceed 4.3 ppmvd @ 19% O<sub>2</sub> (referenced as NO<sub>2</sub>). [District Rules 2201 & 4309, 5.2] Federally Enforceable Through Title V Permit
20. CO emissions from the regenerative thermal oxidizers shall not exceed 25.0 ppmvd @ 19% O<sub>2</sub>. [District Rules 2201 & 4309, 5.2] Federally Enforceable Through Title V Permit
21. Emissions from the regenerative thermal oxidizers shall not exceed any of the following limits: 0.00285 lb-SO<sub>x</sub>/MMBtu, 0.0076 lb-PM<sub>10</sub>/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
22. 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
23. 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
24. Source testing to measure NO<sub>x</sub> and CO emissions from the drying ovens shall be conducted at the exhaust of the associated regenerative thermal oxidizer at least once every 24 months. [District Rules 2201 and 4309, 6.3.2] 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. All test results for NO<sub>x</sub> and CO shall be reported in ppmv @ 19% O<sub>2</sub> (or no correction if measured above 19% O<sub>2</sub>), corrected to dry stack conditions. [District Rule 4309, 6.3.7] Federally Enforceable Through Title V Permit
26. NO<sub>x</sub> emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis. [District Rule 4309, 6.2] Federally Enforceable Through Title V Permit
27. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rule 4309, 6.2] Federally Enforceable Through Title V Permit
28. Stack gas oxygen (O<sub>2</sub>) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4309, 6.2] Federally Enforceable Through Title V Permit
29. 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, 5.5.1 & 5.5.2] Federally Enforceable Through Title V Permit
30. 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, 5.5.6] Federally Enforceable Through Title V Permit
31. 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
32. 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
33. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> 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, 5.4] Federally Enforceable Through Title V Permit
34. If either the NO<sub>x</sub> or CO concentrations corrected to 19% O<sub>2</sub> (or no correction if measured above 19% O<sub>2</sub>), 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 re-established, 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, 5.4] Federally Enforceable Through Title V Permit
35. 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 readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4309, 5.4] Federally Enforceable Through Title V Permit
36. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 19% O<sub>2</sub> (or no correction if measured above 19% O<sub>2</sub>), (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, 5.4] Federally Enforceable Through Title V Permit

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

37. 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
38. 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
39. 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
40. 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
41. 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
42. 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
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, and 4309] Federally Enforceable Through Title V Permit
44. 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
45. 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
46. 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
47. If the District or EPA determine that a Quality improvement plan is required under 40 CFR part 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64.8. [40 CFR Part 64] Federally Enforceable Through Title V Permit

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

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# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1646-25-5

EXPIRATION DATE: 09/30/2013  
**DRAFT**

## EQUIPMENT DESCRIPTION:

GRAPHIC ARTS PRINTING OPERATION CONSISTING OF ONE KOENIG & BAUER COMMANDER HEATSET OFFSET LITHOGRAPHIC PRINTING PRESS (PRESS #508) AND ONE 31.5 MMBTU/HR (3 BURNERS @ 10.5 MMBTU/HR EACH) NATURAL GAS FIRED MEG TEC MODEL DUAL DRY III 119 DRYING OVEN SERVED BY THE 9.5 MMBTU/HR MEG TEC ENTERPRISE II OR THE 18 MMBTU/HR REECO RETHERM MODEL E NATURAL GAS FIRED REGENERATIVE THERMAL OXIDIZERS

## PERMIT UNIT REQUIREMENTS

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The drying ovens and regenerative thermal oxidizers shall be fired exclusively on natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The drying ovens serving the heatset offset printing press shall be maintained under negative pressure and shall be vented through the 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
4. 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, 5.6] Federally Enforceable Through Title V Permit
5. Each regenerative thermal oxidizer shall be operated with a minimum VOC destruction efficiency of 98%. [District Rules 2201 and 4607, 5.6] Federally Enforceable Through Title V Permit
6. 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
7. 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
8. 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
9. For a permittee using any solvent containing more than 25 g/L (0.21 lb/gal) of VOC for organic solvent cleaning, cleaning activities shall be by one of the following methods: (1) wipe cleaning; or (2) application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force; or (3) non-atomized solvent flow method in which the cleaning solvent is collected in a container or a collection system which is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container; or (4) solvent flushing method in which the cleaning solvent is discharged into a container that is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container. The discharged solvent from the equipment must be collected into containers without atomizing into the open air. The solvent may be flushed through the system by air or hydraulic pressure, or by pumping. [District Rule 4607, 5.8.3] 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, 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
11. For a permittee using any solvent containing more than 25 g/L (0.21 lb/gal) of VOC for organic solvent cleaning, the permittee shall not use VOC-containing material to clean spray equipment used for the application of coatings, adhesives, or ink, unless an enclosed system or equipment that is proven to be equally effective at controlling emissions is used for cleaning. If an enclosed system is used, it must totally enclose spray guns, cups, nozzles, bowls, and other parts during washing, rinsing, draining procedures, and it must be used according to manufacturer's recommendations and must be closed when not in use. [District Rule 4607, 5.8.5] Federally Enforceable Through Title V Permit
12. 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
13. 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
14. The Volatile Organic Compound (VOC) content of the printing inks as applied (excluding water and exempt compounds) shall be less than 45% by weight and the VOC content of the fountain solutions shall be less than 15% by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
15. VOC emissions from the printing inks and solvents shall not exceed 60 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Emissions from the drying oven shall not exceed any of the following limits: 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
17. NOx emissions from the drying oven shall not exceed 4.3 ppmvd @ 19% O2 (referenced as NO2). [District Rules 2201 & 4309, 5.2] Federally Enforceable Through Title V Permit
18. CO emissions from the drying oven shall not exceed 25.0 ppmvd @ 19% O2. [District Rules 2201 & 4309, 5.2] Federally Enforceable Through Title V Permit
19. NOx emissions from the regenerative thermal oxidizers shall not exceed 4.3 ppmvd @ 19% O2 (referenced as NO2). [District Rules 2201 & 4309, 5.2] Federally Enforceable Through Title V Permit
20. CO emissions from the regenerative thermal oxidizers shall not exceed 25.0 ppmvd @ 19% O2. [District Rules 2201 & 4309, 5.2] Federally Enforceable Through Title V Permit
21. Emissions from the regenerative thermal oxidizers shall not exceed any of the following limits: 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
22. 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
23. 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
24. Source testing to measure NOx and CO emissions from the drying ovens shall be conducted at the exhaust of the associated regenerative thermal oxidizer at least once every 24 months. [District Rules 2201 and 4309, 6.3.2] 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. All test results for NO<sub>x</sub> and CO shall be reported in ppmv @ 19% O<sub>2</sub> (or no correction if measured above 19% O<sub>2</sub>), corrected to dry stack conditions. [District Rule 4309, 6.3.7] Federally Enforceable Through Title V Permit
26. NO<sub>x</sub> emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis. [District Rule 4309, 6.2] Federally Enforceable Through Title V Permit
27. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rule 4309, 6.2] Federally Enforceable Through Title V Permit
28. Stack gas oxygen (O<sub>2</sub>) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4309, 6.2] Federally Enforceable Through Title V Permit
29. 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, 5.5.1 & 5.5.2] Federally Enforceable Through Title V Permit
30. 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, 5.5.6] Federally Enforceable Through Title V Permit
31. 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
32. 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
33. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> 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, 5.4] Federally Enforceable Through Title V Permit
34. If either the NO<sub>x</sub> or CO concentrations corrected to 19% O<sub>2</sub> (or no correction if measured above 19% O<sub>2</sub>), 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 re-established, 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, 5.4] Federally Enforceable Through Title V Permit
35. 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, 5.4] Federally Enforceable Through Title V Permit
36. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 19% O<sub>2</sub> (or no correction if measured above 19% O<sub>2</sub>), (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, 5.4] Federally Enforceable Through Title V Permit

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

37. 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
38. 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
39. 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
40. 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
41. 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
42. 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
43. 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
44. 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
45. 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
46. 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
47. If the District or EPA determine that a Quality improvement plan is required under 40 CFR part 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64.8. [40 CFR Part 64] Federally Enforceable Through Title V Permit

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

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# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-1646-34-2

**EXPIRATION DATE:** 09/30/2013

**EQUIPMENT DESCRIPTION:**

235 HP DETROIT DIESEL MODEL 1044-7312 DIESEL FIRED EMERGENCY IC ENGINE POWERING A FIRE PUMP

## PERMIT UNIT REQUIREMENTS

1. This engine shall be operated and maintained in proper operating condition as recommended by the engine manufacturer or emissions control system supplier. The operator shall: (1) Change the oil and filter every 500 hours of operation, or annually, whichever comes first; (2) Inspect the air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and (3) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary. [District Rule 4702 and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
2. Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801 and 17 CCR 93115] Federally Enforceable Through Title V Permit
3. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702, 17 CCR 93115, and 40 CFR Part 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
4. This engine shall be operated only for testing and maintenance of the engine, required regulatory purposes, and during emergency situations. For testing purposes, the engine shall only be operated the number of hours necessary to comply with the testing requirements of the National Fire Protection Association (NFPA) 25 - "Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems", 1998 edition. Total hours of operation for all maintenance, testing, and required regulatory purposes shall not exceed 100 hours per calendar year. [District Rule 4702, 17 CCR 93115, and 40 CFR Part 63, Subpart ZZZZ] Federally Enforceable Through Title V Permit
5. An emergency situation is an unscheduled electrical power outage caused by sudden and reasonably unforeseen natural disasters or sudden and reasonably unforeseen events beyond the control of the permittee. [District Rule 4702] Federally Enforceable Through Title V Permit
6. This engine shall not be used for the electrical distribution system, as part of a voluntary utility demand reduction program, or for an interruptible power contract. [District Rule 4702] Federally Enforceable Through Title V Permit
7. During periods of operation for maintenance, testing, and required regulatory purposes, the permittee shall monitor the operational characteristics of the engine as recommended by the manufacturer or emission control system supplier (for example: check engine fluid levels, battery, cables and connections; change engine oil and filters; replace engine coolant; and/or other operational characteristics as recommended by the manufacturer or supplier). [District Rule 4702] Federally Enforceable Through Title V Permit
8. The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and maintenance operations, and the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.). For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rule 4702, 17 CCR 93115, and 40 CFR Part 63, Subpart ZZZZ] Federally Enforceable Through Title V Permit

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

9. {3415} The permittee shall maintain monthly records of the type of fuel purchased, the amount of fuel purchased, date when the fuel was purchased, signature of the permittee who received the fuel, and signature of the fuel supplier indicating that the fuel was delivered. [17 CCR 93115]
10. 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 Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit

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

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# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1646-36-5

EXPIRATION DATE: 09/30/2013

## EQUIPMENT DESCRIPTION:

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

## PERMIT UNIT REQUIREMENTS

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The drying ovens and regenerative thermal oxidizers shall be fired exclusively on natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The drying ovens serving the heatset offset printing press shall be maintained under negative pressure and shall be vented through the 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
4. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper is acceptable), roof overhang, or any other obstruction. [District Rule 4102]
5. 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
6. 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, 5.6] Federally Enforceable Through Title V Permit
7. Each regenerative thermal oxidizer shall be operated with a minimum VOC destruction efficiency of 98%. [District Rules 2201 and 4607, 5.6] Federally Enforceable Through Title V Permit
8. 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
9. 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
10. 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.

11. For a permittee using any solvent containing more than 25 g/L (0.21 lb/gal) of VOC for organic solvent cleaning, cleaning activities shall be by one of the following methods: (1) wipe cleaning; or (2) application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force; or (3) non-atomized solvent flow method in which the cleaning solvent is collected in a container or a collection system which is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container; or (4) solvent flushing method in which the cleaning solvent is discharged into a container that is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container. The discharged solvent from the equipment must be collected into containers without atomizing into the open air. The solvent may be flushed through the system by air or hydraulic pressure, or by pumping. [District Rule 4607, 5.8.3] Federally Enforceable Through Title V Permit
12. For a permittee using any solvent containing more than 25 g/L (0.21 lb/gal) of VOC for organic solvent cleaning, solvent shall not be atomized into the open air unless it is vented to a VOC control device. This provision shall not apply to operations where roller or blanket wash is applied automatically and the cleaning of the nozzle tips of automated spray equipment systems, except for robotic systems, and cleaning with nonpropellant-induced, hand-held spray bottles or containers which solvents are dispensed without a propellant-induced force. [District Rule 4607, 5.8.4] Federally Enforceable Through Title V Permit
13. For a permittee using any solvent containing more than 25 g/L (0.21 lb/gal) of VOC for organic solvent cleaning, the permittee shall not use VOC-containing material to clean spray equipment used for the application of coatings, adhesives, or ink, unless an enclosed system or equipment that is proven to be equally effective at controlling emissions is used for cleaning. If an enclosed system is used, it must totally enclose spray guns, cups, nozzles, bowls, and other parts during washing, rinsing, draining procedures, and it must be used according to manufacturer's recommendations and must be closed when not in use. [District Rule 4607, 5.8.5] Federally Enforceable Through Title V Permit
14. Permittee shall store or dispose of fresh or spent solvents, waste solvent cleaning materials, coatings, adhesives, catalysts, thinners, and inks in closed, non-absorbent, non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4607, 5.9] Federally Enforceable Through Title V Permit
15. The permittee shall properly use and operate all graphic arts printing technologies as directed and/or specified by the manufacturer of the printer or graphic arts material. [District Rule 4607, 5.10] Federally Enforceable Through Title V Permit
16. 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
17. VOC emissions from the printing inks and solvents shall not exceed 95.5 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Emissions from the drying ovens shall not exceed any of the following limits: 0.00285 lb-SO<sub>x</sub>/MMBtu, 0.0076 lb-PM<sub>10</sub>/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
19. NO<sub>x</sub> emissions from the drying oven shall not exceed 4.3 ppmvd @ 19% O<sub>2</sub> (referenced as NO<sub>2</sub>). [District Rules 2201 & 4309, 5.2] Federally Enforceable Through Title V Permit
20. CO emissions from the drying oven shall not exceed 25.0 ppmvd @ 19% O<sub>2</sub>. [District Rules 2201 & 4309, 5.2] Federally Enforceable Through Title V Permit
21. Emissions from the regenerative thermal oxidizers shall not exceed any of the following limits: 0.00285 lb-SO<sub>x</sub>/MMBtu, 0.0076 lb-PM<sub>10</sub>/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
22. NO<sub>x</sub> emissions from the regenerative thermal oxidizers shall not exceed 4.3 ppmvd @ 19% O<sub>2</sub> (referenced as NO<sub>2</sub>). [District Rules 2201 & 4309, 5.2] Federally Enforceable Through Title V Permit
23. CO emissions from the regenerative thermal oxidizers shall not exceed 25.0 ppmvd @ 19% O<sub>2</sub>. [District Rules 2201 & 4309, 5.2] 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.

24. 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
25. 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
26. Source testing to determine the destruction efficiency of each regenerative thermal oxidizer shall be conducted using EPA Methods 2, 2A, or 2D for measuring flow rates and EPA Methods 25, 25A, or 25C for measuring total gaseous organic concentrations at the inlet and outlet of the control device. [District Rule 4607, 6.4.7] Federally Enforceable Through Title V Permit
27. Source testing to measure NO<sub>x</sub> and CO emissions from the drying ovens shall be conducted at the exhaust of the associated regenerative thermal oxidizer at least once every 24 months. [District Rules 2201 and 4309, 6.3.2] Federally Enforceable Through Title V Permit
28. All test results for NO<sub>x</sub> and CO shall be reported in ppmv @ 19% O<sub>2</sub> (or no correction if measured above 19% O<sub>2</sub>), corrected to dry stack conditions. [District Rule 4309, 6.3.7] Federally Enforceable Through Title V Permit
29. NO<sub>x</sub> emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis. [District Rule 4309, 6.2] Federally Enforceable Through Title V Permit
30. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rule 4309, 6.2] Federally Enforceable Through Title V Permit
31. Stack gas oxygen (O<sub>2</sub>) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4309, 6.2] Federally Enforceable Through Title V Permit
32. 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, 5.5.1 & 5.5.2] Federally Enforceable Through Title V Permit
33. 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, 5.5.6] Federally Enforceable Through Title V Permit
34. 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
35. 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
36. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> 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, 5.4] Federally Enforceable Through Title V Permit
37. If either the NO<sub>x</sub> or CO concentrations corrected to 19% O<sub>2</sub> (or no correction if measured above 19% O<sub>2</sub>), 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 re-established, 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, 6.4] Federally Enforceable Through Title V Permit

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

38. 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, 5.4] Federally Enforceable Through Title V Permit
39. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 19% O<sub>2</sub> (or no correction if measured above 19% O<sub>2</sub>), (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, 5.4] Federally Enforceable Through Title V Permit
40. 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
41. 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
42. 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
43. 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
44. 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
45. 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
46. 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
47. 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
48. 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
49. 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
50. 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
51. If the District or EPA determine that a Quality improvement plan is required under 40 CFR part 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64.8. [40 CFR Part 64] Federally Enforceable Through Title V Permit

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

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# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1646-37-4

EXPIRATION DATE: 09/30/2013

## EQUIPMENT DESCRIPTION:

GRAPHIC ARTS PRINTING OPERATION CONSISTING OF ONE MAN ROLAND MODEL ROTOMAN S 64" WIDE 8-COLOR HEATSET OFFSET LITHOGRAPHIC PRINTING PRESS (PRESS #522) WITH ONE 9.4 MMBTU/HR NATURAL GAS FIRED MEG TEC MODEL DD III-135-2080 DRYING OVEN #1 AND ONE 9.0 MMBTU/HR NATURAL GAS FIRED MEG TEC MODEL DD III-135-2080 DRYING OVEN #2 EACH VENTED TO 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 ovens and regenerative 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 ovens shall be installed, utilized and maintained. [District Rules 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 regenerative thermal oxidizer shall be installed, utilized and maintained. [District Rules 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 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
6. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper is acceptable), 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 regenerative thermal oxidizer shall be operated with a minimum VOC destruction efficiency of 98%. [District Rule 2201] Federally Enforceable Through Title V Permit
9. 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. 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 Rules 2201 and 2520, and 40 CFR Part 64]
10. The regenerative thermal oxidizer shall be equipped with an operational continuous temperature monitoring and recording instrument. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
11. 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

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

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. Solvents 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. 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
18. VOC emissions from the printing inks and solvents shall not exceed 95.5 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
19. NO<sub>x</sub> emissions from the drying ovens shall not exceed 4.3 ppmvd @ 19% O<sub>2</sub> (referenced as NO<sub>2</sub>) or 0.0492 lb-NO<sub>x</sub>/MMBtu. [District Rules 2201 & 4309] Federally Enforceable Through Title V Permit
20. VOC emission from the drying ovens shall not exceed 0.0055 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
21. Emissions from the drying ovens shall not exceed any of the following limits: 0.00285 lb-SO<sub>x</sub>/MMBtu, 0.0076 lb-PM<sub>10</sub>/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
22. NO<sub>x</sub> emissions from the regenerative thermal oxidizer shall not exceed 4.3 ppmvd @ 19% O<sub>2</sub> (referenced as NO<sub>2</sub>) or 0.0492 lb-NO<sub>x</sub>/MMBtu. [District Rules 2201 & 4309] Federally Enforceable Through Title V Permit
23. CO emissions from the regenerative thermal oxidizer shall not exceed 25.0 ppmvd @ 19% O<sub>2</sub> or 0.174 lb-CO/MMBtu. [District Rules 2201 & 4309] Federally Enforceable Through Title V Permit
24. Emissions from the regenerative thermal oxidizers shall not exceed any of the following limits: 0.00285 lb-SO<sub>x</sub>/MMBtu, 0.0076 lb-PM<sub>10</sub>/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
25. The total quantity of natural gas used in the drying ovens under this permit unit shall not exceed 137,000 cubic feet in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
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26. The total quantity of natural gas used in the drying ovens under this permit unit shall not exceed 50.0 million cubic feet in any one calendar year. [District Rule 2201] Federally Enforceable Through Title V Permit
27. The total quantity of natural gas used in the regenerative thermal oxidizer shall not exceed 25.0 million cubic feet in any one calendar year. [District Rule 2201] Federally Enforceable Through Title V Permit
28. 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
29. 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
30. Source testing to measure NO<sub>x</sub> and CO emissions from the drying ovens shall be conducted at the exhaust of the associated regenerative thermal oxidizer at least once every 24 months. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit
31. All test results for NO<sub>x</sub> and CO shall be reported in ppmv @ 19% O<sub>2</sub> (or no correction if measured above 19% O<sub>2</sub>), corrected to dry stack conditions. [District Rule 4309] Federally Enforceable Through Title V Permit
32. NO<sub>x</sub> 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
33. 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
34. Stack gas oxygen (O<sub>2</sub>) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4309] Federally Enforceable Through Title V Permit
35. 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
36. 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
37. 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
38. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
39. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> 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

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

40. If either the NO<sub>x</sub> or CO concentrations corrected to 19% O<sub>2</sub> (or no correction if measured above 19% O<sub>2</sub>), 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 re-established, 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
41. 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
42. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 19% O<sub>2</sub> (or no correction if measured above 19% O<sub>2</sub>), (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
43. 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
44. The permittee shall record on a daily basis, the type and amount of each coating, adhesive, fountain solution, wash primer, and solvent used. [District Rule 2201 & 4607] Federally Enforceable Through Title V Permit
45. 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
46. 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
47. 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
48. The permittee shall maintain daily records of the following: (1). Quantity of VOC emitted (in pounds) from this printing press; (2). Cumulative quantity of VOC emitted (in pounds) from all graphic arts printing operations at the facility; (3) Quantity of natural gas used (in cubic feet) by each drying oven and each thermal oxidizer at the facility; (4) Operational temperature of each thermal oxidizer. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
49. The permittee shall maintain a record of the cumulative annual quantity of natural gas used (in cubic feet) by the drying ovens under this permit. The cumulative total quantity of natural gas used shall be updated monthly. [District Rule 2201] Federally Enforceable Through Title V Permit
50. 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 and 4309] Federally Enforceable Through Title V Permit
51. 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
52. 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

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

53. If the District or EPA determine that a Quality improvement plan is required under 40 CFR part 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64.8. [40 CFR Part 64] Federally Enforceable Through Title V Permit

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

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# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1646-38-6

EXPIRATION DATE: 09/30/2013

## EQUIPMENT DESCRIPTION:

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

## PERMIT UNIT REQUIREMENTS

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The drying ovens and regenerative thermal oxidizers shall be fired exclusively on natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
3. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of natural gas combusted in each drying oven shall be installed, utilized and maintained. [District Rules 2201] Federally Enforceable Through Title V Permit
4. The drying ovens serving the heatset offset printing press shall be maintained under negative pressure and shall be vented through the thermal oxidizer at all times except during periods of start-up while the dryers are being air purged. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper is acceptable), roof overhang, or any other obstruction. [District Rule 4102]
6. 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, 5.6] Federally Enforceable Through Title V Permit
7. Each thermal oxidizer shall be operated with a minimum VOC destruction efficiency of 98%. [District Rules 2201 and 4607, 5.6] Federally Enforceable Through Title V Permit
8. Each thermal oxidizer shall be equipped with an operational continuous temperature monitoring and recording instrument. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The VOC content of the materials shall not exceed the following: inks less than 45% VOC by weight (less water and exempt compounds) and fountain solutions less than 15% by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The VOC content of organic solvents used to perform surface preparation or solvent cleaning shall not exceed the VOC content limits specified in Table 7 of Rule 4607 (Graphic Arts and Paper, Film, Foil, and Fabric Coatings - 12/18/08 version). [District Rule 4607, 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.

11. For a permittee using any solvent containing more than 25 g/L (0.21 lb/gal) of VOC for organic solvent cleaning, cleaning activities shall be by one of the following methods: (1) wipe cleaning; or (2) application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force; or (3) non-atomized solvent flow method in which the cleaning solvent is collected in a container or a collection system which is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container; or (4) solvent flushing method in which the cleaning solvent is discharged into a container that is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container. The discharged solvent from the equipment must be collected into containers without atomizing into the open air. The solvent may be flushed through the system by air or hydraulic pressure, or by pumping. [District Rule 4607, 5.8.3] Federally Enforceable Through Title V Permit
12. For a permittee using any solvent containing more than 25 g/L (0.21 lb/gal) of VOC for organic solvent cleaning, solvent shall not be atomized into the open air unless it is vented to a VOC control device. This provision shall not apply to operations where roller or blanket wash is applied automatically and the cleaning of the nozzle tips of automated spray equipment systems, except for robotic systems, and cleaning with nonpropellant-induced, hand-held spray bottles or containers which solvents are dispensed without a propellant-induced force. [District Rule 4607, 5.8.4] Federally Enforceable Through Title V Permit
13. For a permittee using any solvent containing more than 25 g/L (0.21 lb/gal) of VOC for organic solvent cleaning, the permittee shall not use VOC-containing material to clean spray equipment used for the application of coatings, adhesives, or ink, unless an enclosed system or equipment that is proven to be equally effective at controlling emissions is used for cleaning. If an enclosed system is used, it must totally enclose spray guns, cups, nozzles, bowls, and other parts during washing, rinsing, draining procedures, and it must be used according to manufacturer's recommendations and must be closed when not in use. [District Rule 4607, 5.8.5] Federally Enforceable Through Title V Permit
14. Permittee shall store or dispose of fresh or spent solvents, waste solvent cleaning materials, coatings, adhesives, catalysts, thinners, and inks in closed, non-absorbent, non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4607, 5.9] Federally Enforceable Through Title V Permit
15. The permittee shall properly use and operate all graphic arts printing technologies as directed and/or specified by the manufacturer of the printer or graphic arts material. [District Rule 4607, 5.10] Federally Enforceable Through Title V Permit
16. VOC emissions from the printing inks and solvents shall not exceed 95.5 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
17. NO<sub>x</sub> emissions from the drying ovens shall not exceed 4.3 ppmvd @ 19% O<sub>2</sub> (referenced as NO<sub>2</sub>). [District Rules 2201 & 4309, 5.2] Federally Enforceable Through Title V Permit
18. CO emissions from the drying ovens shall not exceed 25.0 ppmvd @ 19% O<sub>2</sub>. [District Rules 2201 & 4309, 5.2] Federally Enforceable Through Title V Permit
19. Emissions from the drying ovens shall not exceed any of the following limits: 0.00285 lb-SO<sub>x</sub>/MMBtu, 0.0076 lb-PM<sub>10</sub>/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
20. NO<sub>x</sub> emissions from the regenerative thermal oxidizers shall not exceed 4.3 ppmvd @ 19% O<sub>2</sub> (referenced as NO<sub>2</sub>). [District Rules 2201 & 4309, 5.2] Federally Enforceable Through Title V Permit
21. CO emissions from the regenerative thermal oxidizers shall not exceed 25.0 ppmvd @ 19% O<sub>2</sub>. [District Rules 2201 & 4309, 5.2] Federally Enforceable Through Title V Permit
22. Emissions from the regenerative thermal oxidizers shall not exceed any of the following limits: 0.00285 lb-SO<sub>x</sub>/MMBtu, 0.0076 lb-PM<sub>10</sub>/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
23. The total quantity of natural gas used in the drying ovens under this permit unit shall not exceed 137,000 cubic feet in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit

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

24. The total quantity of natural gas used in the drying ovens under this permit unit shall not exceed 50.0 million cubic feet in any one calendar year. [District Rule 2201] Federally Enforceable Through Title V Permit
25. 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
26. Source testing to determine the destruction efficiency of each regenerative thermal oxidizer shall be conducted using EPA Methods 2, 2A, or 2D for measuring flow rates and EPA Methods 25, 25A, or 25C for measuring total gaseous organic concentrations at the inlet and outlet of the control device. [District Rule 4607, 6.4.7] Federally Enforceable Through Title V Permit
27. Source testing to measure NO<sub>x</sub> and CO emissions from the drying ovens shall be conducted at the exhaust of the associated regenerative thermal oxidizer at least once every 24 months. [District Rules 2201 and 4309, 6.3.2] Federally Enforceable Through Title V Permit
28. All test results for NO<sub>x</sub> and CO shall be reported in ppmv @ 19% O<sub>2</sub> (or no correction if measured above 19% O<sub>2</sub>), corrected to dry stack conditions. [District Rule 4309, 6.3.7] Federally Enforceable Through Title V Permit
29. NO<sub>x</sub> emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis. [District Rule 4309, 6.2] Federally Enforceable Through Title V Permit
30. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rule 4309, 6.2] Federally Enforceable Through Title V Permit
31. Stack gas oxygen (O<sub>2</sub>) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4309, 6.2] Federally Enforceable Through Title V Permit
32. 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, 5.5.1 & 5.5.2] Federally Enforceable Through Title V Permit
33. 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, 5.5.6] Federally Enforceable Through Title V Permit
34. 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
35. 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
36. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> 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, 5.4] Federally Enforceable Through Title V Permit
37. If either the NO<sub>x</sub> or CO concentrations corrected to 19% O<sub>2</sub> (or no correction if measured above 19% O<sub>2</sub>), 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 re-established, 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, 6.4] Federally Enforceable Through Title V Permit

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



38. 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 readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4309, 5.4] Federally Enforceable Through Title V Permit
39. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 19% O<sub>2</sub> (or no correction if measured above 19% O<sub>2</sub>), (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, 5.4] Federally Enforceable Through Title V Permit
40. 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
41. 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
42. 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
43. 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
44. 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
45. 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
46. 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
47. 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, and 4309] Federally Enforceable Through Title V Permit
48. 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
49. 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
50. 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
51. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR part 64.7. [40 CFR part 64] Federally Enforceable Through Title V Permit

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

52. 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
53. If the District or EPA determine that a Quality improvement plan is required under 40 CFR part 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64.8. [40 CFR Part 64] Federally Enforceable Through Title V Permit

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

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# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1646-39-7

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 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<sub>x</sub> emissions from the drying oven shall not exceed 4.3 ppmvd @ 19% O<sub>2</sub> (referenced as NO<sub>2</sub>). [District Rule 2201] Federally Enforceable Through Title V Permit
20. CO emissions from the drying oven shall not exceed 25.0 ppmvd @ 19% O<sub>2</sub>. [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<sub>x</sub>/MMBtu, 0.0076 lb-PM<sub>10</sub>/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
22. NO<sub>x</sub> emissions from the regenerative thermal oxidizer shall not exceed 4.3 ppmvd @ 19% O<sub>2</sub> (referenced as NO<sub>2</sub>). [District Rule 2201] Federally Enforceable Through Title V Permit
23. CO emissions from the regenerative thermal oxidizer shall not exceed 25.0 ppmvd @ 19% O<sub>2</sub>. [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<sub>x</sub>/MMBtu, 0.0076 lb-PM<sub>10</sub>/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 25.0 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.

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# ATTACHMENT B

Previous Title V Operating Permit

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**San Joaquin Valley**  
AIR POLLUTION CONTROL DISTRICT



**HEALTHY AIR LIVING™**

**COPY**

# Permit to Operate

**FACILITY:** N-1646

**EXPIRATION DATE:** 09/30/2013

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

QG, LLC  
N61 W23044 HARRY'S WAY  
SUSSEX, WI 53089-3995

**FACILITY LOCATION:**

2201 COOPER AVE  
MERCED, CA 95348

**FACILITY DESCRIPTION:**

COMMERCIAL PRINTING

The Facility's Permit to Operate may include Facility-wide Requirements as well as requirements that apply to specific permit units.

This Permit to Operate remains valid through the permit expiration date listed above, subject to payment of annual permit fees and compliance with permit conditions and all applicable local, state, and federal regulations. This permit is valid only at the location specified above, and becomes void upon any transfer of ownership or location. Any modification of the equipment or operation, as defined in District Rule 2201, will require prior District approval. This permit shall be posted as prescribed in District Rule 2010.

**Seyed Sadredin**  
Executive Director / APCO

**David Warner**  
Director of Permit Services



# San Joaquin Valley Air Pollution Control District

FACILITY: N-1646-0-2

EXPIRATION DATE: 09/30/2013

## FACILITY-WIDE REQUIREMENTS

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1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
3. Total Volatile Organic Compound (VOC) emissions from the entire stationary source (excluding permit unit N-1646-34) shall not exceed 235.6 pounds in any single day. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Total NOx emissions from the entire stationary source (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 8:15PM - 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

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

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

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

38. Any unpaved vehicle/equipment area that anticipates more than 75 vehicle trips per day shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 100 vehicle trips per day shall comply with the requirements of Section 5.1.2 of District Rule 8071. All sources shall comply with the requirements of Section 5.0 of District Rule 8071 unless specifically exempted under Section 4.0 of Rule 8071 (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

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-1646-2-3

**EXPIRATION DATE:** 09/30/2013

**EQUIPMENT DESCRIPTION:**

PAPER SCRAP HANDLING SYSTEM SERVING THE PAPER SLITTERS ON PRINTING PRESS #524 & #531, INSERTER BINDERIES #733, #734, #735, #737, #738 AND #739 AND THE BINDERIES #760, #761, #762, #763, #764 AND #765. THE PAPER SCRAP FROM ALL THESE UNITS IS CONVEYED PNEUMATICALLY TO FIVE MAREN BALERS (A, B, C, D AND E) EACH SERVED BY ITS OWN SOCK FILTER SYSTEM

## PERMIT UNIT REQUIREMENTS

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1. All ducting and control equipment shall be in good working order to prevent fugitive particulate emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
2. A spare set of sock filters shall be maintained on the premises at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Visible emissions from each sock filter serving the baler shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Material removed from sock filters shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
5. PM10 emissions from each sock filter system exhaust shall not exceed 0.00234 pounds per ton of total scrap material collected by the Maren balers. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The combined amount of scrap material collected by the Maren balers shall not exceed 43 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Each sock filters shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
8. Records of dust collector system maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
9. The permittee shall maintain daily records of the amount of scrap collected by the Maren balers (tons/day). [District Rule 2201] Federally Enforceable Through Title V Permit
10. All records shall be retained for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-1646-6-5

**EXPIRATION DATE:** 09/30/2013

**EQUIPMENT DESCRIPTION:**

GRAPHIC ARTS PRINTING OPERATION CONSISTING OF ONE HARRIS MODEL 1000B HEATSET OFFSET LITHOGRAPHIC PRINTING PRESS #514 SERVED BY TWO TEC NATURAL GAS FIRED DRYING OVENS (TOTAL OF 1.4 MMBTU/HR) ALL VENTED TO THE 9.5 MMBTU/HR MEG TEC ENTERPRISE II OR 18 MMBTU/HR REECO RETHERM MODEL E REGENERATIVE THERMAL OXIDIZERS

## PERMIT UNIT REQUIREMENTS

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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 ovens and regenerative thermal oxidizers shall be fired exclusively on natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The drying oven 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 dryer is being air purged. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The collection system for the dryer exhaust and for all fugitive VOC emissions shall have a minimum capture efficiency of 90%. [District Rules 2201 and 4607, 5.6] Federally Enforceable Through Title V Permit
5. Each thermal oxidizer shall be operated with a minimum VOC destruction efficiency of 98%. [District Rules 2201 and 4607, 5.6] Federally Enforceable Through Title V Permit
6. Each thermal oxidizer shall be equipped with an operational continuous temperature monitoring and recording instrument. [District , Rules 2201, 2520, 9.3.2, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
7. Each thermal oxidizer shall be operated at a minimum temp. of 1400 deg. F. The incinerator shall be preheated to 1400 deg. F prior to the start-up of the heatset offset printing operation. [District Rules 2201, 2520, 9.3.2, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
8. 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
9. For a permittee using any solvent containing more than 25 g/L (0.21 lb/gal) of VOC for organic solvent cleaning, cleaning activities shall be by one of the following methods: (1) wipe cleaning; or (2) application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force; or (3) non-atomized solvent flow method in which the cleaning solvent is collected in a container or a collection system which is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container; or (4) solvent flushing method in which the cleaning solvent is discharged into a container that is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container. The discharged solvent from the equipment must be collected into containers without atomizing into the open air. The solvent may be flushed through the system by air or hydraulic pressure, or by pumping. [District Rule 4607, 5.8.3] 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, 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
11. For a permittee using any solvent containing more than 25 g/L (0.21 lb/gal) of VOC for organic solvent cleaning, the permittee shall not use VOC-containing material to clean spray equipment used for the application of coatings, adhesives, or ink, unless an enclosed system or equipment that is proven to be equally effective at controlling emissions is used for cleaning. If an enclosed system is used, it must totally enclose spray guns, cups, nozzles, bowls, and other parts during washing, rinsing, draining procedures, and it must be used according to manufacturer's recommendations and must be closed when not in use. [District Rule 4607, 5.8.5] Federally Enforceable Through Title V Permit
12. 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
13. 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
14. The Volatile Organic Compound (VOC) content of the printing inks as applied (excluding water and exempt compounds) shall be less than 45% by weight and the VOC content of the fountain solutions shall be less than 15% by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
15. VOC emissions from the printing inks and solvents shall not exceed 37.5 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
16. NO<sub>x</sub> emissions from the drying oven shall not exceed 4.3 ppmvd @ 19% O<sub>2</sub> (referenced as NO<sub>2</sub>). [District Rule 2201] Federally Enforceable Through Title V Permit
17. CO emissions from the drying oven shall not exceed 25.0 ppmvd @ 19% O<sub>2</sub>. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Emissions from the drying oven shall not exceed any of the following limits: 0.00285 lb-SO<sub>x</sub>/MMBtu, 0.0076 lb-PM<sub>10</sub>/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
19. NO<sub>x</sub> emissions from the regenerative thermal oxidizers shall not exceed 4.3 ppmvd @ 19% O<sub>2</sub> (referenced as NO<sub>2</sub>). [District Rule 2201] Federally Enforceable Through Title V Permit
20. CO emissions from the regenerative thermal oxidizers shall not exceed 25.0 ppmvd @ 19% O<sub>2</sub>. [District Rule 2201] Federally Enforceable Through Title V Permit
21. Emissions from the regenerative thermal oxidizers shall not exceed any of the following limits: 0.00285 lb-SO<sub>x</sub>/MMBtu, 0.0076 lb-PM<sub>10</sub>/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
22. 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
23. 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
24. 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

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

25. 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
26. 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
27. 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
28. 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
29. 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
30. 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
31. 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
32. 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
33. Each thermal oxidizer shall be operated at a minimum temp. of 1400 deg. F. Upon determining an excursion from this requirement, the permittee shall investigate the excursion and take corrective action to minimize emissions and prevent recurrence of the excursion as expeditiously as practicable. [District Rule 2520, 9.3.2 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
34. 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
35. 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
36. If the District or EPA determine that a Quality improvement plan is required under 40 CFR part 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64.8. [40 CFR Part 64] Federally Enforceable Through Title V Permit

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



# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-1646-16-5

**EXPIRATION DATE:** 09/30/2013

**EQUIPMENT DESCRIPTION:**

GRAPHIC ARTS PRINTING OPERATION CONSISTING OF ONE HARRIS MODEL 1000 HEATSET OFFSET LITHOGRAPHIC PRINTING PRESS #517 SERVED BY TWO TEC NATURAL GAS FIRED DRYING OVENS (TOTAL OF 1.366 MMBTU/HR) ALL VENTED TO THE 9.5 MMBTU/HR MEG TEC ENTERPRISE II OR 18 MMBTU/HR REECO RETHERM MODEL E REGENERATIVE THERMAL OXIDIZERS

## PERMIT UNIT REQUIREMENTS

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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 ovens and regenerative thermal oxidizers shall be fired exclusively on natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The drying oven 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 dryer is being air purged. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The collection system for the dryer exhaust and for all fugitive VOC emissions shall have a minimum capture efficiency of 90%. [District Rules 2201 and 4607, 5.6] Federally Enforceable Through Title V Permit
5. Each thermal oxidizer shall be operated with a minimum VOC destruction efficiency of 98%. [District Rules 2201 and 4607, 5.6] Federally Enforceable Through Title V Permit
6. Each thermal oxidizer shall be equipped with an operational continuous temperature monitoring and recording instrument. [District , Rules 2201, 2520, 9.3.2, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
7. Each thermal oxidizer shall be operated at a minimum temp. of 1400 deg. F. The incinerator shall be preheated to 1400 deg. F prior to the start-up of the heatset offset printing operation. [District Rules 2201, 2520, 9.3.2, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
8. 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
9. For a permittee using any solvent containing more than 25 g/L (0.21 lb/gal) of VOC for organic solvent cleaning, cleaning activities shall be by one of the following methods: (1) wipe cleaning; or (2) application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force; or (3) non-atomized solvent flow method in which the cleaning solvent is collected in a container or a collection system which is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container; or (4) solvent flushing method in which the cleaning solvent is discharged into a container that is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container. The discharged solvent from the equipment must be collected into containers without atomizing into the open air. The solvent may be flushed through the system by air or hydraulic pressure, or by pumping. [District Rule 4607, 5.8.3] 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, 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
11. For a permittee using any solvent containing more than 25 g/L (0.21 lb/gal) of VOC for organic solvent cleaning, the permittee shall not use VOC-containing material to clean spray equipment used for the application of coatings, adhesives, or ink, unless an enclosed system or equipment that is proven to be equally effective at controlling emissions is used for cleaning. If an enclosed system is used, it must totally enclose spray guns, cups, nozzles, bowls, and other parts during washing, rinsing, draining procedures, and it must be used according to manufacturer's recommendations and must be closed when not in use. [District Rule 4607, 5.8.5] Federally Enforceable Through Title V Permit
12. 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
13. 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
14. The Volatile Organic Compound (VOC) content of the printing inks as applied (excluding water and exempt compounds) shall be less than 45% by weight and the VOC content of the fountain solutions shall be less than 15% by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
15. VOC emissions from the printing inks and solvents shall not exceed 27 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
16. NO<sub>x</sub> emissions from the drying oven shall not exceed 4.3 ppmvd @ 19% O<sub>2</sub> (referenced as NO<sub>2</sub>). [District Rule 2201] Federally Enforceable Through Title V Permit
17. CO emissions from the drying oven shall not exceed 25.0 ppmvd @ 19% O<sub>2</sub>. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Emissions from the drying oven shall not exceed any of the following limits: 0.00285 lb-SO<sub>x</sub>/MMBtu, 0.0076 lb-PM<sub>10</sub>/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
19. NO<sub>x</sub> emissions from the regenerative thermal oxidizers shall not exceed 4.3 ppmvd @ 19% O<sub>2</sub> (referenced as NO<sub>2</sub>). [District Rule 2201] Federally Enforceable Through Title V Permit
20. CO emissions from the regenerative thermal oxidizers shall not exceed 25.0 ppmvd @ 19% O<sub>2</sub>. [District Rule 2201] Federally Enforceable Through Title V Permit
21. Emissions from the regenerative thermal oxidizers shall not exceed any of the following limits: 0.00285 lb-SO<sub>x</sub>/MMBtu, 0.0076 lb-PM<sub>10</sub>/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
22. 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
23. 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
24. 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

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

25. 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
26. 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
27. 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
28. 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
29. 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
30. 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
31. 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
32. 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
33. Each thermal oxidizer shall be operated at a minimum temp. of 1400 deg. F. Upon determining an excursion from this requirement, the permittee shall investigate the excursion and take corrective action to minimize emissions and prevent recurrence of the excursion as expeditiously as practicable. [District Rule 2520, 9.3.2 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
34. 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
35. 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
36. If the District or EPA determine that a Quality improvement plan is required under 40 CFR part 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64.8. [40 CFR Part 64] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-1646-19-4

**EXPIRATION DATE:** 09/30/2013

**EQUIPMENT DESCRIPTION:**

PAPER SLITTING SYSTEM SERVING PRINTING PRESSES #507 AND #520, AND TWO HARRIS MODEL RG321 BINDER SAWS (BINDERS #713 AND #714). THE PAPER SCRAP FROM THESE UNITS IS CONVEYED PNEUMATICALLY TO A BALE MASTER BALER SERVED BY A MAC MODEL 44RPT 280 BAGHOUSE SYSTEM

## PERMIT UNIT REQUIREMENTS

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1. All ducting and control equipment shall be in good working order to prevent fugitive particulate emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The baghouse exhaust fan(s) shall be in operation during paper scrap conveying operation. [District Rule 2201] Federally Enforceable Through Title V Permit
3. PM10 emissions from the Mac baghouse exhaust shall not exceed 0.000234 pounds per ton of total scrap material collected by the Bale Master baler. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The amount of scrap material collected by the Bale Master baler shall not exceed 2.4 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The baghouse shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The baghouse shall operate at all times with a minimum differential pressure of 1 inches water column and a maximum differential pressure of 6 inches water column. [District Rule 2201]
7. Replacement bags numbering at least 10% of the total number of bags in the largest baghouse using each type of bag shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Material removed from baghouse shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
10. There shall be no visible emissions from the dust control system. [District Rules 2201 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
11. Visible emissions from the baghouse shall be evaluated using EPA method 22 for a period of at least 6 minutes at least once during each day that the baghouse is operated. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
12. Dust collection system shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
13. Dust collector filters shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] 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.

14. Records of dust collector maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
15. The permittee shall maintain on a daily basis, records of visible emissions from the baghouse, the amount of scrap collected in tons/day, and pressure differential gauge reading. [District Rules 2201 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
16. All records shall be retained for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-1646-23-5

**EXPIRATION DATE:** 09/30/2013

**EQUIPMENT DESCRIPTION:**

GRAPHIC ARTS PRINTING OPERATION CONSISTING OF ONE HEIDELBERG HARRIS MODEL M-1000B HEATSET OFFSET PRINTING PRESS #519 SERVED BY ONE 9.5 MMBTU/HR THERMAL ELECTRON MODEL A3406E DRYING OVEN VENTED TO THE 9.5 MMBTU/HR MEG TEC ENTERPRISE II OR 18 MMBTU/HR REECO RETHERM MODEL E REGENERATIVE THERMAL OXIDIZERS

## PERMIT UNIT REQUIREMENTS

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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 ovens and regenerative thermal oxidizers shall be fired exclusively on natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The drying ovens serving the heatset offset printing press shall be maintained under negative pressure and shall be vented through the 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
4. 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, 5.6] Federally Enforceable Through Title V Permit
5. Each regenerative thermal oxidizer shall be operated with a minimum VOC destruction efficiency of 98%. [District Rules 2201 and 4607, 5.6] Federally Enforceable Through Title V Permit
6. 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
7. 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
8. 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
9. For a permittee using any solvent containing more than 25 g/L (0.21 lb/gal) of VOC for organic solvent cleaning, cleaning activities shall be by one of the following methods: (1) wipe cleaning; or (2) application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force; or (3) non-atomized solvent flow method in which the cleaning solvent is collected in a container or a collection system which is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container; or (4) solvent flushing method in which the cleaning solvent is discharged into a container that is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container. The discharged solvent from the equipment must be collected into containers without atomizing into the open air. The solvent may be flushed through the system by air or hydraulic pressure, or by pumping. [District Rule 4607, 5.8.3] 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, 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
11. For a permittee using any solvent containing more than 25 g/L (0.21 lb/gal) of VOC for organic solvent cleaning, the permittee shall not use VOC-containing material to clean spray equipment used for the application of coatings, adhesives, or ink, unless an enclosed system or equipment that is proven to be equally effective at controlling emissions is used for cleaning. If an enclosed system is used, it must totally enclose spray guns, cups, nozzles, bowls, and other parts during washing, rinsing, draining procedures, and it must be used according to manufacturer's recommendations and must be closed when not in use. [District Rule 4607, 5.8.5] Federally Enforceable Through Title V Permit
12. 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
13. 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
14. The Volatile Organic Compound (VOC) content of the printing inks as applied (excluding water and exempt compounds) shall be less than 45% by weight and the VOC content of the fountain solutions shall be less than 15% by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
15. VOC emissions from the printing inks and solvents shall not exceed 37.5 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
16. NO<sub>x</sub> emissions from the drying oven shall not exceed 4.3 ppmvd @ 19% O<sub>2</sub> (referenced as NO<sub>2</sub>). [District Rules 2201 & 4309, 5.2] Federally Enforceable Through Title V Permit
17. CO emissions from the drying oven shall not exceed 25.0 ppmvd @ 19% O<sub>2</sub>. [District Rules 2201 & 4309, 5.2] Federally Enforceable Through Title V Permit
18. Emissions from the drying oven shall not exceed any of the following limits: 0.00285 lb-SO<sub>x</sub>/MMBtu, 0.0076 lb-PM<sub>10</sub>/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
19. NO<sub>x</sub> emissions from the regenerative thermal oxidizers shall not exceed 4.3 ppmvd @ 19% O<sub>2</sub> (referenced as NO<sub>2</sub>). [District Rules 2201 & 4309, 5.2] Federally Enforceable Through Title V Permit
20. CO emissions from the regenerative thermal oxidizers shall not exceed 25.0 ppmvd @ 19% O<sub>2</sub>. [District Rules 2201 & 4309, 5.2] Federally Enforceable Through Title V Permit
21. Emissions from the regenerative thermal oxidizers shall not exceed any of the following limits: 0.00285 lb-SO<sub>x</sub>/MMBtu, 0.0076 lb-PM<sub>10</sub>/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
22. 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
23. 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
24. Source testing to measure NO<sub>x</sub> and CO emissions from the drying ovens shall be conducted at the exhaust of the associated regenerative thermal oxidizer at least once every 24 months. [District Rules 2201 and 4309, 6.3.2] 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. All test results for NO<sub>x</sub> and CO shall be reported in ppmv @ 19% O<sub>2</sub> (or no correction if measured above 19% O<sub>2</sub>), corrected to dry stack conditions. [District Rule 4309, 6.3.7] Federally Enforceable Through Title V Permit
26. NO<sub>x</sub> emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis. [District Rule 4309, 6.2] Federally Enforceable Through Title V Permit
27. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rule 4309, 6.2] Federally Enforceable Through Title V Permit
28. Stack gas oxygen (O<sub>2</sub>) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4309, 6.2] Federally Enforceable Through Title V Permit
29. 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, 5.5.1 & 5.5.2] Federally Enforceable Through Title V Permit
30. 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, 5.5.6] Federally Enforceable Through Title V Permit
31. 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
32. 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
33. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> 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, 5.4] Federally Enforceable Through Title V Permit
34. If either the NO<sub>x</sub> or CO concentrations corrected to 19% O<sub>2</sub> (or no correction if measured above 19% O<sub>2</sub>), 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 re-established, 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, 5.4] Federally Enforceable Through Title V Permit
35. 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 readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4309, 5.4] Federally Enforceable Through Title V Permit
36. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 19% O<sub>2</sub> (or no correction if measured above 19% O<sub>2</sub>), (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, 5.4] Federally Enforceable Through Title V Permit

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



37. 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
38. 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
39. 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
40. 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
41. 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
42. 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
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, and 4309] Federally Enforceable Through Title V Permit
44. 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
45. 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
46. 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
47. If the District or EPA determine that a Quality improvement plan is required under 40 CFR part 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64.8. [40 CFR Part 64] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-1646-25-4

**EXPIRATION DATE:** 09/30/2013

**EQUIPMENT DESCRIPTION:**

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

## PERMIT UNIT REQUIREMENTS

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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 ovens and regenerative thermal oxidizers shall be fired exclusively on natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The drying ovens serving the heatset offset printing press shall be maintained under negative pressure and shall be vented through the 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
4. 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, 5.6] Federally Enforceable Through Title V Permit
5. Each regenerative thermal oxidizer shall be operated with a minimum VOC destruction efficiency of 98%. [District Rules 2201 and 4607, 5.6] Federally Enforceable Through Title V Permit
6. 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
7. 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
8. 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
9. For a permittee using any solvent containing more than 25 g/L (0.21 lb/gal) of VOC for organic solvent cleaning, cleaning activities shall be by one of the following methods: (1) wipe cleaning; or (2) application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force; or (3) non-atomized solvent flow method in which the cleaning solvent is collected in a container or a collection system which is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container; or (4) solvent flushing method in which the cleaning solvent is discharged into a container that is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container. The discharged solvent from the equipment must be collected into containers without atomizing into the open air. The solvent may be flushed through the system by air or hydraulic pressure, or by pumping. [District Rule 4607, 5.8.3] 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, 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
11. For a permittee using any solvent containing more than 25 g/L (0.21 lb/gal) of VOC for organic solvent cleaning, the permittee shall not use VOC-containing material to clean spray equipment used for the application of coatings, adhesives, or ink, unless an enclosed system or equipment that is proven to be equally effective at controlling emissions is used for cleaning. If an enclosed system is used, it must totally enclose spray guns, cups, nozzles, bowls, and other parts during washing, rinsing, draining procedures, and it must be used according to manufacturer's recommendations and must be closed when not in use. [District Rule 4607, 5.8.5] Federally Enforceable Through Title V Permit
12. 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
13. 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
14. The Volatile Organic Compound (VOC) content of the printing inks as applied (excluding water and exempt compounds) shall be less than 45% by weight and the VOC content of the fountain solutions shall be less than 15% by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
15. VOC emissions from the printing inks and solvents shall not exceed 60 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Emissions from the drying oven shall not exceed any of the following limits: 0.00285 lb-SO<sub>x</sub>/MMBtu, 0.0076 lb-PM<sub>10</sub>/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
17. NO<sub>x</sub> emissions from the drying oven shall not exceed 4.3 ppmvd @ 19% O<sub>2</sub> (referenced as NO<sub>2</sub>). [District Rules 2201 & 4309, 5.2] Federally Enforceable Through Title V Permit
18. CO emissions from the drying oven shall not exceed 25.0 ppmvd @ 19% O<sub>2</sub>. [District Rules 2201 & 4309, 5.2] Federally Enforceable Through Title V Permit
19. NO<sub>x</sub> emissions from the regenerative thermal oxidizers shall not exceed 4.3 ppmvd @ 19% O<sub>2</sub> (referenced as NO<sub>2</sub>). [District Rules 2201 & 4309, 5.2] Federally Enforceable Through Title V Permit
20. CO emissions from the regenerative thermal oxidizers shall not exceed 25.0 ppmvd @ 19% O<sub>2</sub>. [District Rules 2201 & 4309, 5.2] Federally Enforceable Through Title V Permit
21. Emissions from the regenerative thermal oxidizers shall not exceed any of the following limits: 0.00285 lb-SO<sub>x</sub>/MMBtu, 0.0076 lb-PM<sub>10</sub>/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
22. 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
23. 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
24. Source testing to measure NO<sub>x</sub> and CO emissions from the drying ovens shall be conducted at the exhaust of the associated regenerative thermal oxidizer at least once every 24 months. [District Rules 2201 and 4309, 6.3.2] 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. All test results for NO<sub>x</sub> and CO shall be reported in ppmv @ 19% O<sub>2</sub> (or no correction if measured above 19% O<sub>2</sub>), corrected to dry stack conditions. [District Rule 4309, 6.3.7] Federally Enforceable Through Title V Permit
26. NO<sub>x</sub> emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis. [District Rule 4309, 6.2] Federally Enforceable Through Title V Permit
27. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rule 4309, 6.2] Federally Enforceable Through Title V Permit
28. Stack gas oxygen (O<sub>2</sub>) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4309, 6.2] Federally Enforceable Through Title V Permit
29. 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, 5.5.1 & 5.5.2] Federally Enforceable Through Title V Permit
30. 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, 5.5.6] Federally Enforceable Through Title V Permit
31. 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
32. 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
33. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> 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, 5.4] Federally Enforceable Through Title V Permit
34. If either the NO<sub>x</sub> or CO concentrations corrected to 19% O<sub>2</sub> (or no correction if measured above 19% O<sub>2</sub>), 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 re-established, 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, 5.4] Federally Enforceable Through Title V Permit
35. 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, 5.4] Federally Enforceable Through Title V Permit
36. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 19% O<sub>2</sub> (or no correction if measured above 19% O<sub>2</sub>), (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, 5.4] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
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37. 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
38. 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
39. 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
40. 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
41. 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
42. 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
43. 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
44. 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
45. 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
46. 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
47. 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

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# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1646-36-4

EXPIRATION DATE: 09/30/2013

## EQUIPMENT DESCRIPTION:

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

## PERMIT UNIT REQUIREMENTS

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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 ovens and regenerative thermal oxidizers shall be fired exclusively on natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The drying ovens serving the heatset offset printing press shall be maintained under negative pressure and shall be vented through the 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
4. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
5. 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
6. 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, 5.6] Federally Enforceable Through Title V Permit
7. Each regenerative thermal oxidizer shall be operated with a minimum VOC destruction efficiency of 98%. [District Rules 2201 and 4607, 5.6] Federally Enforceable Through Title V Permit
8. 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
9. 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
10. 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  
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11. For a permittee using any solvent containing more than 25 g/L (0.21 lb/gal) of VOC for organic solvent cleaning, cleaning activities shall be by one of the following methods: (1) wipe cleaning; or (2) application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force; or (3) non-atomized solvent flow method in which the cleaning solvent is collected in a container or a collection system which is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container; or (4) solvent flushing method in which the cleaning solvent is discharged into a container that is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container. The discharged solvent from the equipment must be collected into containers without atomizing into the open air. The solvent may be flushed through the system by air or hydraulic pressure, or by pumping. [District Rule 4607, 5.8.3] Federally Enforceable Through Title V Permit
12. For a permittee using any solvent containing more than 25 g/L (0.21 lb/gal) of VOC for organic solvent cleaning, solvent shall not be atomized into the open air unless it is vented to a VOC control device. This provision shall not apply to operations where roller or blanket wash is applied automatically and the cleaning of the nozzle tips of automated spray equipment systems, except for robotic systems, and cleaning with nonpropellant-induced, hand-held spray bottles or containers which solvents are dispensed without a propellant-induced force. [District Rule 4607, 5.8.4] Federally Enforceable Through Title V Permit
13. For a permittee using any solvent containing more than 25 g/L (0.21 lb/gal) of VOC for organic solvent cleaning, the permittee shall not use VOC-containing material to clean spray equipment used for the application of coatings, adhesives, or ink, unless an enclosed system or equipment that is proven to be equally effective at controlling emissions is used for cleaning. If an enclosed system is used, it must totally enclose spray guns, cups, nozzles, bowls, and other parts during washing, rinsing, draining procedures, and it must be used according to manufacturer's recommendations and must be closed when not in use. [District Rule 4607, 5.8.5] Federally Enforceable Through Title V Permit
14. Permittee shall store or dispose of fresh or spent solvents, waste solvent cleaning materials, coatings, adhesives, catalysts, thinners, and inks in closed, non-absorbent, non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4607, 5.9] Federally Enforceable Through Title V Permit
15. The permittee shall properly use and operate all graphic arts printing technologies as directed and/or specified by the manufacturer of the printer or graphic arts material. [District Rule 4607, 5.10] Federally Enforceable Through Title V Permit
16. 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
17. VOC emissions from the printing inks and solvents shall not exceed 95.5 pounds in any one day. [District NSR Rule] Federally Enforceable Through Title V Permit
18. Emissions from the drying ovens shall not exceed any of the following limits: 0.00285 lb-SO<sub>x</sub>/MMBtu, 0.0076 lb-PM<sub>10</sub>/MMBtu, or 0.0055 lb-VOC/MMBtu. [District NSR Rule] Federally Enforceable Through Title V Permit
19. NO<sub>x</sub> emissions from the drying oven shall not exceed 4.3 ppmvd @ 19% O<sub>2</sub> (referenced as NO<sub>2</sub>). [District Rules 2201 & 4309, 5.2] Federally Enforceable Through Title V Permit
20. CO emissions from the drying oven shall not exceed 25.0 ppmvd @ 19% O<sub>2</sub>. [District Rules 2201 & 4309, 5.2] Federally Enforceable Through Title V Permit
21. Emissions from the regenerative thermal oxidizers shall not exceed any of the following limits: 0.00285 lb-SO<sub>x</sub>/MMBtu, 0.0076 lb-PM<sub>10</sub>/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
22. NO<sub>x</sub> emissions from the regenerative thermal oxidizers shall not exceed 4.3 ppmvd @ 19% O<sub>2</sub> (referenced as NO<sub>2</sub>). [District Rules 2201 & 4309, 5.2] Federally Enforceable Through Title V Permit
23. CO emissions from the regenerative thermal oxidizers shall not exceed 25.0 ppmvd @ 19% O<sub>2</sub>. [District Rules 2201 & 4309, 5.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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24. 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
25. 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
26. Source testing to determine the destruction efficiency of each regenerative thermal oxidizer shall be conducted using EPA Methods 2, 2A, or 2D for measuring flow rates and EPA Methods 25, 25A, or 25C for measuring total gaseous organic concentrations at the inlet and outlet of the control device. [District Rule 4607, 6.4.7] Federally Enforceable Through Title V Permit
27. Source testing to measure NO<sub>x</sub> and CO emissions from the drying ovens shall be conducted at the exhaust of the associated regenerative thermal oxidizer at least once every 24 months. [District Rules 2201 and 4309, 6.3.2] Federally Enforceable Through Title V Permit
28. All test results for NO<sub>x</sub> and CO shall be reported in ppmv @ 19% O<sub>2</sub> (or no correction if measured above 19% O<sub>2</sub>), corrected to dry stack conditions. [District Rule 4309, 6.3.7] Federally Enforceable Through Title V Permit
29. NO<sub>x</sub> emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis. [District Rule 4309, 6.2] Federally Enforceable Through Title V Permit
30. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rule 4309, 6.2] Federally Enforceable Through Title V Permit
31. Stack gas oxygen (O<sub>2</sub>) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4309, 6.2] Federally Enforceable Through Title V Permit
32. 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, 5.5.1 & 5.5.2] Federally Enforceable Through Title V Permit
33. 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, 5.5.6] Federally Enforceable Through Title V Permit
34. 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
35. 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
36. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> 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, 5.4] Federally Enforceable Through Title V Permit
37. If either the NO<sub>x</sub> or CO concentrations corrected to 19% O<sub>2</sub> (or no correction if measured above 19% O<sub>2</sub>), 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 re-established, 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, 5.4] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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38. 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, 5.4] Federally Enforceable Through Title V Permit
39. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 19% O<sub>2</sub> (or no correction if measured above 19% O<sub>2</sub>), (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, 5.4] Federally Enforceable Through Title V Permit
40. 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
41. 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
42. 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
43. 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
44. 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
45. 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
46. 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
47. 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
48. 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
49. 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
50. 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
51. If the District or EPA determine that a Quality improvement plan is required under 40 CFR part 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64.8: [40 CFR Part 64] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-1646-37-3

**EXPIRATION DATE:** 09/30/2013

## **EQUIPMENT DESCRIPTION:**

GRAPHIC ARTS PRINTING OPERATION CONSISTING OF ONE MAN ROLAND MODEL ROTOMAN S 64" WIDE 8-COLOR HEATSET OFFSET LITHOGRAPHIC PRINTING PRESS (PRESS #522) WITH ONE 9.4 MMBTU/HR NATURAL GAS MEGTEC MODEL DD III-135-2080 DRYING OVEN #1 AND ONE 9.0 MMBTU/HR NATURAL GAS FIRED MODEL DD III-135-2080 DRYING OVEN #2 EACH VENTED TO THE SHARED 5.728 MMBTU/HR MEGTEC CLEANSWITCH MODEL CS-300-95 NATURAL GAS FIRED REGENERATIVE THERMAL OXIDIZER

## **PERMIT UNIT REQUIREMENTS**

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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 ovens and regenerative 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 ovens shall be installed, utilized and maintained. [District Rules 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 regenerative thermal oxidizer shall be installed, utilized and maintained. [District Rules 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 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
6. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102] Federally Enforceable Through Title V Permit
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 regenerative thermal oxidizer shall be operated with a minimum VOC destruction efficiency of 98%. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The regenerative 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 regenerative 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 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

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

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. Solvents 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. 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
18. VOC emissions from the printing inks and solvents shall not exceed 95.5 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
19. NO<sub>x</sub> emissions from the drying ovens shall not exceed 4.3 ppmvd @ 19% O<sub>2</sub> (referenced as NO<sub>2</sub>) or 0.0492 lb-NO<sub>x</sub>/MMBtu. [District Rules 2201 & 4309] Federally Enforceable Through Title V Permit
20. VOC emission from the drying ovens shall not exceed 0.0055 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
21. Emissions from the drying ovens shall not exceed any of the following limits: 0.00285 lb-SO<sub>x</sub>/MMBtu, 0.0076 lb-PM<sub>10</sub>/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
22. NO<sub>x</sub> emissions from the regenerative thermal oxidizer shall not exceed 4.3 ppmvd @ 19% O<sub>2</sub> (referenced as NO<sub>2</sub>) or 0.0492 lb-NO<sub>x</sub>/MMBtu. [District Rules 2201 & 4309] Federally Enforceable Through Title V Permit
23. CO emissions from the regenerative thermal oxidizer shall not exceed 25.0 ppmvd @ 19% O<sub>2</sub> or 0.174 lb-CO/MMBtu. [District Rules 2201 & 4309] Federally Enforceable Through Title V Permit
24. Emissions from the regenerative thermal oxidizers shall not exceed any of the following limits: 0.00285 lb-SO<sub>x</sub>/MMBtu, 0.0076 lb-PM<sub>10</sub>/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
25. The total quantity of natural gas used in the drying ovens under this permit unit shall not exceed 137,000 cubic feet in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit

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

26. The total quantity of natural gas used in the drying ovens under this permit unit shall not exceed 50.0 million cubic feet in any one calendar year. [District Rule 2201] Federally Enforceable Through Title V Permit
27. The total quantity of natural gas used in the regenerative thermal oxidizer shall not exceed 25,000 million cubic feet in any one calendar year. [District Rule 2201] Federally Enforceable Through Title V Permit
28. 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
29. 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
30. Source testing to measure NO<sub>x</sub> and CO emissions from the drying ovens shall be conducted at the exhaust of the associated regenerative thermal oxidizer at least once every 24 months. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit
31. All test results for NO<sub>x</sub> and CO shall be reported in ppmv @ 19% O<sub>2</sub> (or no correction if measured above 19% O<sub>2</sub>), corrected to dry stack conditions. [District Rule 4309] Federally Enforceable Through Title V Permit
32. NO<sub>x</sub> 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
33. 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
34. Stack gas oxygen (O<sub>2</sub>) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4309] Federally Enforceable Through Title V Permit
35. 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
36. 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
37. 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
38. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
39. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> 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

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

40. 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 re-established, 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
41. 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
42. 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
43. 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
44. The permittee shall record on a daily basis, the type and amount of each coating, adhesive, fountain solution, wash primer, and solvent used. [District Rule 2201 & 4607] Federally Enforceable Through Title V Permit
45. 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
46. 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
47. 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
48. The permittee shall maintain daily records of the following: (1). Quantity of VOC emitted (in pounds) from this printing press; (2). Cumulative quantity of VOC emitted (in pounds) from all graphic arts printing operations at the facility; (3) Quantity of natural gas used (in cubic feet) by each drying oven and each thermal oxidizer at the facility; (4) Operational temperature of each thermal oxidizer. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
49. The permittee shall maintain a record of the cumulative annual quantity of natural gas used (in cubic feet) by the drying ovens under this permit. The cumulative total quantity of natural gas used shall be updated monthly. [District Rule 2201] Federally Enforceable Through Title V Permit
50. 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 and 4309] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-1646-38-5

**EXPIRATION DATE:** 09/30/2013

**EQUIPMENT DESCRIPTION:**

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

## PERMIT UNIT REQUIREMENTS

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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 ovens and regenerative thermal oxidizers shall be fired exclusively on natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
3. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of natural gas combusted in each drying oven shall be installed, utilized and maintained. [District Rules 2201] Federally Enforceable Through Title V Permit
4. The drying ovens serving the heatset offset printing press shall be maintained under negative pressure and shall be vented through the thermal oxidizer at all times except during periods of start-up while the dryers are being air purged. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
6. 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, 5.6] Federally Enforceable Through Title V Permit
7. Each thermal oxidizer shall be operated with a minimum VOC destruction efficiency of 98%. [District Rules 2201 and 4607, 5.6] Federally Enforceable Through Title V Permit
8. Each thermal oxidizer shall be equipped with an operational continuous temperature monitoring and recording instrument. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The VOC content of the materials shall not exceed the following: inks less than 45% VOC by weight (less water and exempt compounds) and fountain solutions less than 15% by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The VOC content of organic solvents used to perform surface preparation or solvent cleaning shall not exceed the VOC content limits specified in Table 7 of Rule 4607 (Graphic Arts and Paper, Film, Foil, and Fabric Coatings - 12/18/08 version). [District Rule 4607, 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.

11. For a permittee using any solvent containing more than 25 g/L (0.21 lb/gal) of VOC for organic solvent cleaning, cleaning activities shall be by one of the following methods: (1) wipe cleaning; or (2) application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force; or (3) non-atomized solvent flow method in which the cleaning solvent is collected in a container or a collection system which is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container; or (4) solvent flushing method in which the cleaning solvent is discharged into a container that is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container. The discharged solvent from the equipment must be collected into containers without atomizing into the open air. The solvent may be flushed through the system by air or hydraulic pressure, or by pumping. [District Rule 4607, 5.8.3] Federally Enforceable Through Title V Permit
12. For a permittee using any solvent containing more than 25 g/L (0.21 lb/gal) of VOC for organic solvent cleaning, solvent shall not be atomized into the open air unless it is vented to a VOC control device. This provision shall not apply to operations where roller or blanket wash is applied automatically and the cleaning of the nozzle tips of automated spray equipment systems, except for robotic systems, and cleaning with nonpropellant-induced, hand-held spray bottles or containers which solvents are dispensed without a propellant-induced force. [District Rule 4607, 5.8.4] Federally Enforceable Through Title V Permit
13. For a permittee using any solvent containing more than 25 g/L (0.21 lb/gal) of VOC for organic solvent cleaning, the permittee shall not use VOC-containing material to clean spray equipment used for the application of coatings, adhesives, or ink, unless an enclosed system or equipment that is proven to be equally effective at controlling emissions is used for cleaning. If an enclosed system is used, it must totally enclose spray guns, cups, nozzles, bowls, and other parts during washing, rinsing, draining procedures, and it must be used according to manufacturer's recommendations and must be closed when not in use. [District Rule 4607, 5.8.5] Federally Enforceable Through Title V Permit
14. Permittee shall store or dispose of fresh or spent solvents, waste solvent cleaning materials, coatings, adhesives, catalysts, thinners, and inks in closed, non-absorbent, non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4607, 5.9] Federally Enforceable Through Title V Permit
15. The permittee shall properly use and operate all graphic arts printing technologies as directed and/or specified by the manufacturer of the printer or graphic arts material. [District Rule 4607, 5.10] Federally Enforceable Through Title V Permit
16. VOC emissions from the printing inks and solvents shall not exceed 95.5 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
17. NO<sub>x</sub> emissions from the drying ovens shall not exceed 4.3 ppmvd @ 19% O<sub>2</sub> (referenced as NO<sub>2</sub>). [District Rules 2201 & 4309, 5.2] Federally Enforceable Through Title V Permit
18. CO emissions from the drying ovens shall not exceed 25.0 ppmvd @ 19% O<sub>2</sub>. [District Rules 2201 & 4309, 5.2] Federally Enforceable Through Title V Permit
19. Emissions from the drying ovens shall not exceed any of the following limits: 0.00285 lb-SO<sub>x</sub>/MMBtu, 0.0076 lb-PM<sub>10</sub>/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
20. NO<sub>x</sub> emissions from the regenerative thermal oxidizers shall not exceed 4.3 ppmvd @ 19% O<sub>2</sub> (referenced as NO<sub>2</sub>). [District Rules 2201 & 4309, 5.2] Federally Enforceable Through Title V Permit
21. CO emissions from the regenerative thermal oxidizers shall not exceed 25.0 ppmvd @ 19% O<sub>2</sub>. [District Rules 2201 & 4309, 5.2] Federally Enforceable Through Title V Permit
22. Emissions from the regenerative thermal oxidizers shall not exceed any of the following limits: 0.00285 lb-SO<sub>x</sub>/MMBtu, 0.0076 lb-PM<sub>10</sub>/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
23. The total quantity of natural gas used in the drying ovens under this permit unit shall not exceed 137,000 cubic feet in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit

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

24. The total quantity of natural gas used in the drying ovens under this permit unit shall not exceed 50.0 million cubic feet in any one calendar year. [District Rule 2201] Federally Enforceable Through Title V Permit
25. 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
26. Source testing to determine the destruction efficiency of each regenerative thermal oxidizer shall be conducted using EPA Methods 2, 2A, or 2D for measuring flow rates and EPA Methods 25, 25A, or 25C for measuring total gaseous organic concentrations at the inlet and outlet of the control device. [District Rule 4607, 6.4.7] Federally Enforceable Through Title V Permit
27. Source testing to measure NO<sub>x</sub> and CO emissions from the drying ovens shall be conducted at the exhaust of the associated regenerative thermal oxidizer at least once every 24 months. [District Rules 2201 and 4309, 6.3.2] Federally Enforceable Through Title V Permit
28. All test results for NO<sub>x</sub> and CO shall be reported in ppmv @ 19% O<sub>2</sub> (or no correction if measured above 19% O<sub>2</sub>), corrected to dry stack conditions. [District Rule 4309, 6.3.7] Federally Enforceable Through Title V Permit
29. NO<sub>x</sub> emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis. [District Rule 4309, 6.2] Federally Enforceable Through Title V Permit
30. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rule 4309, 6.2] Federally Enforceable Through Title V Permit
31. Stack gas oxygen (O<sub>2</sub>) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4309, 6.2] Federally Enforceable Through Title V Permit
32. 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, 5.5.1 & 5.5.2] Federally Enforceable Through Title V Permit
33. 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, 5.5.6] Federally Enforceable Through Title V Permit
34. 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
35. 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
36. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> 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, 5.4] Federally Enforceable Through Title V Permit
37. If either the NO<sub>x</sub> or CO concentrations corrected to 19% O<sub>2</sub> (or no correction if measured above 19% O<sub>2</sub>), 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 re-established, 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, 5.4] Federally Enforceable Through Title V Permit

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



38. 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 readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4309, 5.4] Federally Enforceable Through Title V Permit
39. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 19% O<sub>2</sub> (or no correction if measured above 19% O<sub>2</sub>), (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, 5.4] Federally Enforceable Through Title V Permit
40. 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
41. 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
42. 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
43. 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
44. 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
45. 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
46. 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
47. 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, and 4309] Federally Enforceable Through Title V Permit
48. 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
49. 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
50. 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
51. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR part 64.7. [40 CFR part 64] Federally Enforceable Through Title V Permit

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

52. 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
53. If the District or EPA determine that a Quality improvement plan is required under 40 CFR part 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64.8. [40 CFR Part 64] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1646-39-6

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

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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<sub>x</sub> emissions from the drying oven shall not exceed 4.3 ppmvd @ 19% O<sub>2</sub> (referenced as NO<sub>2</sub>). [District Rule 2201] Federally Enforceable Through Title V Permit
19. CO emissions from the drying oven shall not exceed 25.0 ppmvd @ 19% O<sub>2</sub>. [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<sub>x</sub>/MMBtu, 0.01 lb-PM<sub>10</sub>/MMBtu, or 0.02 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
21. NO<sub>x</sub> emissions from the regenerative thermal oxidizer shall not exceed 4.3 ppmvd @ 19% O<sub>2</sub> (referenced as NO<sub>2</sub>). [District Rule 2201] Federally Enforceable Through Title V Permit
22. CO emissions from the regenerative thermal oxidizer shall not exceed 25.0 ppmvd @ 19% O<sub>2</sub>. [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.

23. Emissions from the regenerative thermal oxidizer shall not exceed any of the following limits: 0.00285 lb-SO<sub>x</sub>/MMBtu, 0.01 lb-PM<sub>10</sub>/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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# ATTACHMENT C

## Detailed Facility List

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**Detailed Facility Report**  
For Facility=1646 and excluding Deleted Permits  
Sorted by Facility Name and Permit Number

<b>QG, LLC</b> <b>2201 COOPER AVE</b> <b>MERCED, CA 95348</b>	<b>FAC #</b> <b>STATUS:</b> <b>TELEPHONE:</b>	<b>N 1646</b> <b>A</b>	<b>TYPE:</b> <b>TOXIC ID:</b>	<b>TitleV</b> <b>29</b>	<b>EXPIRE ON:</b> <b>AREA:</b> <b>INSP. DATE:</b>	<b>09/30/2013</b> <b>16 /</b> <b>04/14</b>
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PERMIT NUMBER	FEE DESCRIPTION	FEE RULE	QTY	FEE AMOUNT	FEE TOTAL	PERMIT STATUS	EQUIPMENT DESCRIPTION
N-1646-2-3	180 hp	3020-01 D	1	314.00	314.00	A	PAPER SCRAP HANDLING SYSTEM SERVING THE PAPER SLITTERS ON PRINTING PRESS #524 & #531, INSERTER BINDERIES #733, #734, #735, #737, #738 AND #739 AND THE BINDERIES #760, #761, #762, #763, #764 AND #765. THE PAPER SCRAP FROM ALL THESE UNITS IS CONVEYED PNEUMATICALLY TO FIVE MAREN BALERS (A, B, C, D AND E) EACH SERVED BY ITS OWN SOCK FILTER SYSTEM
N-1646-6-5	Total Heat Input: 6.0 MMBtu/hr	3020-02 G	1	815.00	815.00	A	GRAPHIC ARTS PRINTING OPERATION CONSISTING OF ONE HARRIS MODEL 1000B HEATSET OFFSET LITHOGRAPHIC PRINTING PRESS #514 SERVED BY TWO TEC NATURAL GAS FIRED DRYING OVENS (TOTAL OF 1.4 MMBTU/HR) ALL VENTED TO THE 9.5 MMBTU/HR MEG TEC ENTERPRISE II OR 18 MMBTU/HR REECO RETHERM MODEL E REGENERATIVE THERMAL OXIDIZERS
N-1646-16-5	Total Heat Input: 6.0 MMBtu/hr	3020-02 G	1	815.00	815.00	A	GRAPHIC ARTS PRINTING OPERATION CONSISTING OF ONE HARRIS MODEL 1000 HEATSET OFFSET LITHOGRAPHIC PRINTING PRESS #517 SERVED BY TWO TEC NATURAL GAS FIRED DRYING OVENS (TOTAL OF 1.366 MMBTU/HR) ALL VENTED TO THE 9.5 MMBTU/HR MEG TEC ENTERPRISE II OR 18 MMBTU/HR REECO RETHERM MODEL E REGENERATIVE THERMAL OXIDIZERS
N-1646-19-4	150 hp	3020-01 D	1	314.00	314.00	A	PAPER SLITTING SYSTEM SERVING PRINTING PRESSES #507 AND #520, AND TWO HARRIS MODEL RG321 BINDER SAWS (BINDERES #713 AND #714). THE PAPER SCRAP FROM THESE UNITS IS CONVEYED PNEUMATICALLY TO A BALE MASTER BALER SERVED BY A MAC MODEL 44RPT 280 BAGHOUSE SYSTEM
N-1646-23-5	Total Heat Input: 13.1 MMBtu/hr	3020-02 G	1	815.00	815.00	A	GRAPHIC ARTS PRINTING OPERATION CONSISTING OF ONE HEIDELBERG HARRIS MODEL M-1000B HEATSET OFFSET PRINTING PRESS #519 SERVED BY ONE 9.5 MMBTU/HR THERMAL ELECTRON MODEL A3406E DRYING OVEN VENTED TO THE 9.5 MMBTU/HR MEG TEC ENTERPRISE II OR 18 MMBTU/HR REECO RETHERM MODEL E REGENERATIVE THERMAL OXIDIZERS
N-1646-25-4	Total Heat Input: 36.1 MMBtu/hr	3020-02 H	1	1,030.00	1,030.00	A	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
N-1646-34-1	235 hp IC engine	3020-10 C	1	240.00	240.00	A	235 HP DETROIT DIESEL MODEL 1044-7312 EMERGENCY DIESEL FIRED IC ENGINE POWERING A FIRE PUMP



**Detailed Facility Report**  
For Facility=1646 and excluding Deleted Permits  
Sorted by Facility Name and Permit Number

PERMIT NUMBER	FEE DESCRIPTION	FEE RULE	QTY	FEE AMOUNT	FEE TOTAL	PERMIT STATUS	EQUIPMENT DESCRIPTION
N-1646-36-4	Total Heat Input: 24.4 MMBtu/hr	3020-02 H	1	1,030.00	1,030.00	A	GRAPHIC ARTS PRINTING OPERATION CONSISTING OF ONE MAN ROLAND MODEL ROTOMAN S 57.5" WIDE 8-COLOR HEATSET OFFSET LITHOGRAPHIC PRINTING PRESS (PRESS #520) AND TWO 9.9 MMBTU/HR NATURAL GAS FIRED MEGTEC MODEL DD III-135 DRYING OVENS (EACH CONSISTS OF AN 8.4 MMBTU/HR MAXON OVENPAK 400 BURNER AND A 1.5 MMBTU/HR MAXON APX BURNER) SERVED BY THE SHARED 9.5 MMBTU/HR MEGTEC ENTERPRISE II OR THE 18 MMBTU/HR REECO RETHERM MODEL E NATURAL GAS FIRED REGENERATIVE THERMAL OXIDIZERS
N-1646-37-3	Total Heat Input: 21.3 MMBtu/hr	3020-02 H	1	1,030.00	1,030.00	A	GRAPHIC ARTS PRINTING OPERATION CONSISTING OF ONE MAN ROLAND MODEL ROTOMAN S 64" WIDE 8-COLOR HEATSET OFFSET LITHOGRAPHIC PRINTING PRESS (PRESS #522) WITH ONE 9.4 MMBTU/HR NATURAL GAS MEGTEC MODEL DD III-135-2080 DRYING OVEN #1 AND ONE 9.0 MMBTU/HR NATURAL GAS FIRED MODEL DD III-135-2080 DRYING OVEN #2 EACH VENTED TO THE SHARED 5.728 MMBTU/HR MEGTEC CLEANSWITCH MODEL CS-300-95 NATURAL GAS FIRED REGENERATIVE THERMAL OXIDIZER
N-1646-38-5	Total Heat Input:24.4 MMBtu/hr	3020-02 H	1	1,030.00	1,030.00	A	GRAPHIC ARTS PRINTING OPERATION CONSISTING OF ONE MAN ROLAND MODEL ROTOMAN S 64" WIDE 8-COLOR HEATSET OFFSET LITHOGRAPHIC PRINTING PRESS (PRESS #523) WITH ONE 9.4 MMBTU/HR NATURAL GAS FIRED MEGTEC MODEL DD III-135-2080 DRYING OVEN #1 (WITH MAXON LOW NOX BURNERS) AND ONE 9.0 MMBTU/HR NATURAL GAS FIRED MEGTEC MODEL DD III-135-2080 DRYING OVEN #2 (WITH MAXON LOW NOX BURNERS) EACH SERVED BY THE SHARED 9.5 MMBTU/HR MEGTEC ENTERPRISE II OR THE 18 MMBTU/HR REECO RETHERM MODEL E NATURAL GAS FIRED REGENERATIVE THERMAL OXIDIZERS
N-1646-39-6	Total Heat Input: 7.5 MMBtu/hr	3020-02 G	1	815.00	815.00	A	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 WVG DAF-1500 AQUEOUS/UV COATER WITH A RADIANT CURING UNIT AND PRIME UV 6-LAMP CURING SYSTEM.

Number of Facilities Reported: 1