SEP 02 2010

Freider de Biasi
Worldcolor (USA) LLC
2201 Cooper Avenue
Merced, CA 95348

Re: Notice of Final Action - Title V Permit Renewal
District Facility # N-1646
Project # N-1083761

Dear Mr. Biasi:

The District has issued the Final Renewed Title V Permit for Worldcolor (USA) LLC. The preliminary decision for this project was made on July 6, 2010. No comments were received subsequent to the District preliminary decision. Enclosed are the Final Renewed Title V Permit and public notice to be published approximately three days from the date of this letter.

Thank you for your cooperation in this matter. Should you have any questions, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Sincerely,

[Signature]

David Warner
Director of Permit Services

Attachments

cc: Gurpreet Brar, Permit Services Engineer
SEP 02 2010

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

Re: Notice of Final Action - Title V Permit Renewal
District Facility # N-1646
Project # N-1083761

Dear Mr. Rios:

The District has issued the Final Renewed Title V Permit for Worldcolor (USA) LLC. The preliminary decision for this project was made on July 6, 2010. No comments were received subsequent to the District preliminary decision. Enclosed are the Final Renewed Title V Permit and public notice to be published approximately three days from the date of this letter.

I would like to thank you and your staff for working with us. We appreciate your concurrence with this action. Should you have any questions, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Sincerely,

David Warner
Director of Permit Services

Attachments

cc: Gurpreet Brar, Permit Services Engineer

Seyed Sadredin
Executive Director/Air Pollution Control Officer

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

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-8081

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

www.valleyair.org www.healthyairliving.com
SEP 02 2010

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

Re: Notice of Final Action - Title V Permit Renewal
District Facility # N-1646
Project # N-1083761

Dear Mr. Tollstrup:

The District has issued the Final Renewed Title V Permit for Worldcolor (USA) LLC. The preliminary decision for this project was made on July 6, 2010. No comments were received subsequent to the District preliminary decision. Enclosed are the Final Renewed Title V Permit and public notice to be published approximately three days from the date of this letter.

I would like to thank you and your staff for working with us. Should you have any questions, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Sincerely,

David Warner
Director of Permit Services

Attatchments

cc: Gurpreet Brar, Permit Services Engineer
NOTICE IS HEREBY GIVEN that the San Joaquin Valley Air Pollution Control District has made its final decision to issue the renewed Federally Mandated Operating Permit to Worldcolor (USA) LLC for its Graphic Arts Printing Operation at 2201 Cooper Avenue in Merced, California.

The District's analysis of the legal and factual basis for this proposed action, project #N-1083761, is available for public inspection at http://www.valleyair.org/notices/public_notices_idx.htm and the District office at the address below. For additional information regarding this matter, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900, or contact David Warner, Director of Permit Services, in writing at SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT, 1990 E. GETTYSBURG AVE, FRESNO, CA 93726-0244.
Permit to Operate

FACILITY: N-1646
LEGAL OWNER OR OPERATOR: WORLDCOLOR (USA) LLC
MAILING ADDRESS: 2201 COOPER AVE
MERCED, CA 95348
FACILITY LOCATION: 2201 COOPER AVE
MERCED, CA 95348
FACILITY DESCRIPTION: COMMERCIAL PRINTING

EXPIRATION DATE: 09/30/2008

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: 09/30/2008

FACILITY-WIDE REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit

3. Total Volatile Organic Compound (VOC) emissions from the entire stationary source 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 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

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: WORLDCOLOR (USA) LLC
Location: 2201 COOPER AVE, MERCED, CA 95348

N-1646-0-2: Sep 1 2010 11:25AM - BRARG
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

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

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

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. 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 (2/17/03). 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 8011] Federally Enforceable Through Title V Permit
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.
PERMIT UNIT: N-1646-2-3

EXPIRATION DATE: 09/30/2008

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.
PERMIT UNIT REQUIREMENTS

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit

2. The drying ovens and regenerative thermal oxidizers shall be fired exclusively on natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit

3. The drying 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 NSR Rule] 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 NSR Rule 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 NSR Rule 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 NSR Rule, 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 NSR Rule, 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
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 69.1 pounds in any one day. [District NSR Rule] Federally Enforceable Through Title V Permit

16. NOx emissions from the drying oven shall not exceed 4.3 ppmvd @ 19% O2 (referenced as NO2). [District Rule 2201] Federally Enforceable Through Title V Permit

17. CO emissions from the drying oven shall not exceed 25.0 ppmvd @ 19% O2. [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-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, or 0.0055 lb-VOC/MMBtu. [District NSR Rule] 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 Rule 2201] Federally Enforceable Through Title V Permit

20. CO emissions from the regenerative thermal oxidizers shall not exceed 25.0 ppmvd @ 19% O2. [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-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, or 0.0055 lb-VOC/MMBtu. [District NSR Rule] 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 NSR Rule] 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
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-1646-7-3

EXPIRATION DATE: 09/30/2008

EQUIPMENT DESCRIPTION:
GRAPHIC ARTS PRINTING OPERATION CONSISTING OF ONE HARRIS-WEBB MODEL M-1000A HEATSET OFFSET LITHOGRAPHIC PRINTING PRESS #515 SERVED BY TWO TEC MODEL C-2500 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 NSR Rule] Federally Enforceable Through Title V Permit

2. The drying ovens and regenerative thermal oxidizers shall be fired exclusively on natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit

3. The drying 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 NSR Rule] 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 NSR Rule 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 NSR Rule 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 NSR Rule, 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 NSR Rule, 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.

Facility Name: WORLDCOLOR (USA) LLC
Location: 2201 COOPER AVE, MERCED, CA 95348
N-1646-7-3, Sep 1 2010 11:27AM - SRAG
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 20.0 pounds in any one day. [District NSR Rule] Federally Enforceable Through Title V Permit

16. NOx emissions from the drying oven shall not exceed 4.3 ppmvd @ 19% O2 (referenced as NO2). [District Rule 2201] Federally Enforceable Through Title V Permit

17. CO emissions from the drying oven shall not exceed 25.0 ppmvd @ 19% O2. [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-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, or 0.0055 lb-VOC/MMBtu. [District NSR Rule] 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 Rule 2201] Federally Enforceable Through Title V Permit

20. CO emissions from the regenerative thermal oxidizers shall not exceed 25.0 ppmvd @ 19% O2. [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-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, or 0.0055 lb-VOC/MMBtu. [District NSR Rule] 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 NSR Rule] 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
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.
PERMIT UNIT REQUIREMENTS

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit

2. The VOC content of graphic arts materials (as applied, less water and exempt compounds) shall not exceed any of the following limits: Flexographic Inks on Porous Substrates: 225 g/l (1.88 lb/gal); Inks: 300 g/l (2.5 lb/gal); Coatings: 300 g/l (2.5 lb/gal), Adhesives: 150 g/l (1.25 lb/gal); Web Splicing Adhesives: 150 g/l (1.25 lb/gal). [District Rule 4607, 5.1] Federally Enforceable Through Title V Permit

3. An operator performing coldset web offset lithographic printing shall use fountain solution with that is five percent alcohol substitute or less, by weight, and shall have no alcohol in the fountain solution. [District Rule 4607, 5.3] Federally Enforceable Through Title V Permit

4. The VOC content limit for fountain solution used shall not exceed 5% by volume. [District Rules 2201 and 4607, 5.1] Federally Enforceable Through Title V Permit

5. VOC emissions from this printing press shall not exceed 20.0 pounds in any single day. [District Rule 2201] Federally Enforceable Through Title V Permit

6. The VOC content of organic solvents used to perform surface preparation or solvent cleaning shall not exceed the VOC content limits specified in Table 7 of Rule 4607 (12/18/08 version of Rule 4607). [District Rule 4607, 5.8.1] Federally Enforceable Through Title V Permit

7. 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

8. 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
9. 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

10. 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, 5.9] Federally Enforceable Through Title V Permit

11. 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

12. Permittee shall maintain a current file of coatings, inks, adhesives, fountain solutions, wash primers, and solvents in use and in storage. File shall included 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

13. 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

14. The permittee shall record on a monthly basis, the type and amount of each coating, adhesive, wash primer, and solvent used. [District Rule 4607, 6.1.2.2] Federally Enforceable Through Title V Permit

15. 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

16. Compliance with the daily VOC emissions limit for this printing press shall be calculated as follows: Total daily VOC emissions = \[([\text{VOC Content (ink #1)} \times \text{Daily usage (ink #1)} \times (1 - 0.95)] + \ldots + [\text{VOC Content (ink #n)} \times \text{Daily usage (ink #n)} \times (1 - 0.95)]) + ([\text{VOC Content (fountain solution #1)} \times \text{Daily usage (fountain solution #1)}] + [\text{VOC Content (wash primer #1)} \times \text{Daily usage (wash primer #1)}] + [\text{VOC Content (cleanup solvent #1)} \times \text{Daily usage (cleanup solvent #1)}] + \ldots + [\text{VOC Content (fountain solution #n)} \times \text{Daily usage (fountain solution #n)}] + [\text{VOC Content (wash primer #n)} \times \text{Daily usage (wash primer #n)}] + [\text{VOC Content (cleanup solvent #n)} \times \text{Daily usage (cleanup solvent #n)}]). \] [District Rule 2201] Federally Enforceable Through Title V Permit

17. The permittee shall maintain daily records of the following: (1). Quantity of VOC emitted (in pounds) from this printing press; (2). Cumulative quantity of VOC emitted (in pounds) from all graphic arts printing operations at the facility. [District Rule 1070] Federally Enforceable Through Title V Permit

18. All records shall be maintained and retained on-site for a period of at least 5 years and make records available to the APCO, ARB, and EPA upon request. [District Rule 1070]

These terms and conditions are part of the Facility-wide Permit to Operate.
San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: N-1646-11-2
EXPIRATION DATE: 09/30/2008

EQUIPMENT DESCRIPTION:
PRINTER #733, HARRIS VIDEO INK JET, MODEL SP855

PERMIT UNIT REQUIREMENTS

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit

2. The VOC emissions from this printer shall not exceed 1.0 lbs/day. [District NSR Rule] Federally Enforceable Through Title V Permit

3. No more than 10 pounds of ink shall be used in any one day for this printer. [District NSR Rule] Federally Enforceable Through Title V Permit

4. The VOC content as applied for all inks and solvents used by this printer shall not exceed 99% by weight. [District NSR Rule] Federally Enforceable Through Title V Permit

5. Permittee shall maintain a current file of coatings, inks, adhesives, fountain solutions, wash primers and solvents in use and in storage. File shall included 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 Rules 2201 and 4607, 6.1.1] Federally Enforceable Through Title V Permit

6. Maintain a daily record of the volume and VOC content (as applied) of all inks and solvents used. [District NSR Rule] Federally Enforceable Through Title V Permit

7. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available to the APCO, ARB and EPA upon request. [District Rules 1070, 4.0, 4607, 6.1 and 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-1646-12-2
EXPIRATION DATE: 09/30/2008

EQUIPMENT DESCRIPTION:
PRINTER #734, HARRIS VIDEO INK JET, MODEL SP855

PERMIT UNIT REQUIREMENTS

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit

2. The VOC emissions from this printer shall not exceed 1.0 lb/day. [District NSR Rule] Federally Enforceable Through Title V Permit

3. No more than 10 pounds of ink shall be used in any one day for this printer. [District NSR Rule] Federally Enforceable Through Title V Permit

4. The VOC content as applied for all inks and solvents used by this printer shall not exceed 99% by weight. [District NSR Rule] Federally Enforceable Through Title V Permit

5. Permittee shall maintain a current file of coatings, inks, adhesives, fountain solutions, wash primers and solvents in use and in storage. File shall included 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 Rules 2201 and 4607, 6.1.1] Federally Enforceable Through Title V Permit

6. Maintain a daily record of the volume and VOC content (as applied) of all inks and solvents in use. [District NSR Rule] Federally Enforceable Through Title V Permit

7. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available to the APCO, ARB and EPA upon request. [District Rules 1070, 4.0, 4607, 6.1 and 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-1646-13-2

EXPIRATION DATE: 09/30/2008

EQUIPMENT DESCRIPTION:
PRINTER #735, HARRIS VIDEO INK JET, MODEL SP855

PERMIT UNIT REQUIREMENTS

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit

2. The VOC emissions from this printer shall not exceed 1.0 lbs/day. [District NSR Rule] Federally Enforceable Through Title V Permit

3. No more than 10 pounds of ink shall be used in any one day for this printer. [District NSR Rule] Federally Enforceable Through Title V Permit

4. The VOC content as applied for all inks and solvents used by this printer shall not exceed 99% by weight. [District NSR Rule] Federally Enforceable Through Title V Permit

5. Permittee shall maintain a current file of coatings, inks, adhesives, fountain solutions, wash primers and solvents in use and in storage. File shall included 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 Rules 2201 and 4607, 6.1.1] Federally Enforceable Through Title V Permit

6. Maintain a daily record of the volume and VOC content (as applied) of all inks and solvents used. [District NSR Rule] Federally Enforceable Through Title V Permit

7. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available to the APCO, ARB and EPA upon request. [District Rules 1070, 4.0, 4607, 6.1 and 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-1646-14-2
EXPIRATION DATE: 09/30/2008

EQUIPMENT DESCRIPTION:
PRINTER #737, HARRIS VIDEO INK JET, MODEL SP855

PERMIT UNIT REQUIREMENTS

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit

2. This graphic arts printing operation is exempt from the requirements of District Rule 4607 as it emits less than 200 pounds of VOC per 12 rolling consecutive calendar months. [District Rule 4607, 4.1.2] Federally Enforceable Through Title V Permit

3. The VOC emissions from this printer shall not exceed 2.5 lb/day. [District NSR Rule] Federally Enforceable Through Title V Permit

4. No more than 22 pounds of ink shall be used in any one day for this printer. [District NSR Rule] Federally Enforceable Through Title V Permit

5. The VOC content as applied for all inks and solvents used by this printer shall not exceed 99% by weight. [District NSR Rule] Federally Enforceable Through Title V Permit

6. Permittee shall maintain a current file of coatings, inks, adhesives, fountain solutions, wash primers and solvents in use and in storage. File shall included 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 Rules 2201 and 4607, 6.1.1] Federally Enforceable Through Title V Permit

7. Maintain a daily record of the volume and VOC content (as applied) of all inks and solvents used. [District NSR Rule] Federally Enforceable Through Title V Permit

8. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available to the APCO, ARB and EPA upon request. [District Rules 1070, 4.0, 4607, 6.1 and 2520, 9.4.2] Federally Enforceable Through Title V Permit

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

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit

2. The total amount of inks used shall not exceed 6,100 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit

3. Total Volatile Organic Compound (VOC) emissions from the entire stationary source shall not exceed 235.6 pounds in any single day. [District NSR Rule] Federally Enforceable Through Title V Permit

4. For flexographic printing operations, the VOC content of graphic arts materials (as applied, less water and exempt compounds) shall not exceed any of the following limits: Flexographic Inks on Porous Substrates: 225 g/l (1.88 lb/gal); Inks: 300 g/l (2.5 lb/gal); Coatings: 300 g/l (2.5 lb/gal), Adhesives: 150 g/l (1.25 lb/gal); Web Splicing Adhesives: 150 g/l (1.25 lb/gal). [District Rule 4607, 5.1] Federally Enforceable Through Title V Permit

5. For flexographic printing operations, use of specialty inks, as defined in Rule 4607, shall not exceed two gallons in a calendar day and 120 gallons in a calendar year. The VOC content of the specialty inks shall not exceed 300 g/l (2.5 lb/gal), less water and exempt compounds, as applied. [District Rule 4607, 5.2] Federally Enforceable Through Title V Permit

6. Water and non-VOC emitting soaps shall be used for cleanup. [District NSR Rule] Federally Enforceable Through Title V Permit

7. The VOC content of organic solvents used to perform surface preparation or solvent cleaning shall not exceed the VOC content limits specified in Table 7 of Rule 4607 (12/18/08 version of Rule 4607). [District Rule 4607, 5.8.1] Federally Enforceable Through Title V Permit

8. 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.
9. 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

10. 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

11. 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, 5.9] Federally Enforceable Through Title V Permit

12. 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

13. Permittee shall maintain a current file of coatings, inks, adhesives, fountain solutions, wash primers, and solvents in use and in storage. File shall included 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

14. 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

15. The permittee shall record on a monthly basis, the type and amount of each coating, adhesive, wash primer, and solvent used. [District Rule 4607, 6.1.2.2] Federally Enforceable Through Title V Permit

16. 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

17. The permittee shall record on a daily basis, the type and amount of each ink, coating, adhesive, fountain solution, wash primer, and solvent used. [District Rule 4607, 6.1.3] Federally Enforceable Through Title V Permit

18. The permittee shall record on a daily basis, the type and amount of each flexographic specialty ink used [District Rule 4607, 6.1.4] Federally Enforceable Through Title V Permit

19. The permittee shall maintain daily records of the following: (1). Quantity of VOC emitted (in pounds) from this printing press; (2). Cumulative quantity of VOC emitted (in pounds) from all graphic arts printing operations at the facility. [District Rule 1070] Federally Enforceable Through Title V Permit

20. All records shall be maintained and retained on-site for a period of at least 5 years and make records available to the APCO, ARB, and EPA upon request. [District Rules 1070, 2520, and 4607]
San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: N-1646-16-3

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
REITHERM 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 NSR Rule] Federally Enforceable Through Title V Permit

2. The drying ovens and regenerative thermal oxidizers shall be fired exclusively on natural gas. [District Rule 2201]
Federally Enforceable Through Title V Permit

3. The drying 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 NSR Rule] 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 NSR Rule 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 NSR Rule 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 NSR Rule, 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 NSR Rule, 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 69.1 pounds in any one day. [District NSR Rule] Federally Enforceable Through Title V Permit

16. NOx emissions from the drying oven shall not exceed 4.3 ppmvd @ 19% O2 (referenced as NO2). [District Rule 2201] Federally Enforceable Through Title V Permit

17. CO emissions from the drying oven shall not exceed 25.0 ppmvd @ 19% O2. [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-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, or 0.0055 lb-VOC/MMBtu. [District NSR Rule] 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 Rule 2201] Federally Enforceable Through Title V Permit

20. CO emissions from the regenerative thermal oxidizers shall not exceed 25.0 ppmvd @ 19% O2. [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-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, or 0.0055 lb-VOC/MMBtu. [District NSR Rule] 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 NSR Rule] 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.
PERMIT UNIT: N-1646-19-4
EXPIRATION DATE: 09/30/2008

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

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.

Facility Name: WORLDCOLOR (USA) LLC
Location: 2201 COOPER AVE, MERCEDE, CA 95348
N-1646-19-4: Sep 12, 2010 11:27 AM - BRAG
San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: N-1646-23-3

EXPIRATION DATE: 09/30/2008

EQUIPMENT DESCRIPTION:
GRAPHIC ARTS PRINTING OPERATION CONSISTING OF ONE HEIDELBERG HARRIS MODEL M-1000B HEATSET OFFSET PRINTING PRESS #519 SERVED BY ONE 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 NSR Rule] Federally Enforceable Through Title V Permit

2. The drying ovens and regenerative thermal oxidizers shall be fired exclusively on natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit

3. The drying ovens serving the heatset offset printing press shall be maintained under negative pressure and shall be vented through the 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 container 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. VOC emissions from the printing inks and solvents shall not exceed 69.1 pounds in any one day. [District NSR Rule] Federally Enforceable Through Title V Permit

15. 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

16. 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

17. 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 NSR Rule] Federally Enforceable Through Title V Permit

18. 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

19. 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

20. 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 NSR Rule] Federally Enforceable Through Title V Permit

21. 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

22. 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

23. 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 thereafter. [District Rules 2201 and 4309, 6.3.2] Federally Enforceable Through Title V Permit

24. All test results for NOx and CO shall be reported in ppmvd @ 19% O2 (or no correction if measured above 19% O2), corrected to dry stack conditions. [District Rule 4309, 6.3.7] Federally Enforceable Through Title V Permit
25. NOx 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

26. 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

27. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4309, 6.2] Federally Enforceable Through Title V Permit

28. 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

29. 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

30. 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

31. 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

32. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rule 4309, 5.4] Federally Enforceable Through Title V Permit

33. 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 exceedence. 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

34. 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

35. 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, 5.4] Federally Enforceable Through Title V Permit
36. 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

37. The permittee shall record on a daily basis, the type and amount of each coating, adhesive, fountain solution, wash primer, and solvent used. [District Rule 4607, 6.1.3] Federally Enforceable Through Title V Permit

38. The permittee shall record on a monthly basis, the type and amount of all inks used and their VOC content and densities, using one of the methods listed in Rule 4607, Section 6.1.2.1 (12/18/08 version of Rule 4607). [District Rule 4607, 6.1.2.1] Federally Enforceable Through Title V Permit

39. The permittee shall record on a monthly basis, the type and amount of each ink, coating, adhesive, wash primer, and solvent used. [District Rule 4607, 6.1.2.2] Federally Enforceable Through Title V Permit

40. The permittee shall record on a monthly basis, the type, amount and percent VOC by volume of each fountain solution used. [District Rule 4607, 6.1.2.3] Federally Enforceable Through Title V Permit

41. The permittee shall maintain daily records of the following: (1). Quantity of VOC emitted (in pounds) from this printing press; (2). Cumulative quantity of VOC emitted (in pounds) from all graphic arts printing operations at the facility; (3) Quantity of natural gas used (in cubic feet) by each drying oven and each thermal oxidizer at the facility; (4) Operational temperature of each regenerative thermal oxidizer. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit

42. 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

43. 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

44. 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

45. 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

46. 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.
PERMIT UNIT: N-1646-24-3

EXPIRATION DATE: 09/30/2008

EQUIPMENT DESCRIPTION:
GRAPHIC ARTS PRINTING OPERATION CONSISTING OF ONE KOENIG & BAUER MODEL CAMPACTA 618 HEATSET OFFSET PRINTING PRESS #507 SERVED BY ONE 8.75 MMBTU/HR THERMO ELECTRON MODEL 2700/3500 DRYING OVEN VENTED TO THE 9.5 MMBTU/HR MEG TEC ENTERPRISE II OR 18 MMBTU/HR REECO RETHERMAL REGENERATIVE THERMAL OXIDIZERS

PERMIT UNIT REQUIREMENTS

1. No modification to this unit shall be performed without an Authority to Construct for such modification(s), except for changes specified in conditions below. [District Rule 2010] Federally Enforceable Through Title V Permit

2. The natural gas supply line to the drying oven shall be locked off and secured with seals (#100178 & #100179) at the main gas valve, and the gas meter reading shall not exceed 063954.000 cubic feet. [District Rule 4309] Federally Enforceable Through Title V Permit

3. This equipment shall not be operated for any reason until an Authority to Construct permit is issued approving all necessary retrofits required to comply with the applicable requirements of District Rule 4309 and all other applicable District regulations. [District Rule 4309] Federally Enforceable Through Title V Permit

4. The drying oven and regenerative thermal oxidizers shall be fired exclusively on natural gas. [District NSR Rule]

5. 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 NSR Rule]

6. The collection system for the dryer exhaust and for all fugitive VOC emissions shall have a minimum capture efficiency of 90%. [District NSR Rule and 4607, 5.5]

7. Each thermal oxidizer shall be operated with a minimum VOC destruction efficiency of 98%. [District NSR Rule and 4607, 5.5]

8. Each thermal oxidizer shall be operated at a minimum temp. of 1400 deg. F. The incinerator shall be preheated to 1400 deg. F prior to the start-up of the heatset offset printing operation. [District NSR Rule, 2520, 9.3.2, and 40 CFR Part 64]

9. Each thermal incinerator shall be equipped with a continuous temperature monitoring and recording instrument. [District NSR Rule, 2520, 9.3.2, and 40 CFR Part 64]

10. Solvents to perform surface preparation or cleanup shall not exceed the VOC content and composite vapor pressure limits of Rule 4607 (Graphic Arts) Table 6. [District Rule 4607, 5.8.3]

11. No owner or operator shall use organic solvents for cleaning operations that exceed the VOC content limit specified in Table 6, Rule 4607 (12/20/01 version of Rule 4607). [District Rule 4607, 5.8.3]

12. For a permittee using any solvent containing more than 50 g/L of VOC for organic solvent cleaning, cleaning activities shall be by one of the following methods: wipe cleaning; application of solvent using nonpropellant-induced, hand-held spray bottles; non-atomized solvent flow method, or solvent flushing method. [District Rule 4607, 5.8.6]
13. For a permittee using any solvent containing more than 50 g/L 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. [District Rule 4607, 5.8.7]

14. For a permittee using any solvent containing more than 50 g/L 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 component part(s) being cleaned 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, 5.8.8]

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, 5.8.9]

16. VOC emissions from the printing inks and solvents shall not exceed 69.1 pounds in any one day. [District NSR Rule]

17. The NOx emission concentration from the drying oven shall not exceed 65 ppmv, dry, corrected to 3% oxygen (O2). [District NSR Rule]

18. Emissions from the drying oven shall not exceed any of the following limits: 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 0.084 lb-CO/MMBtu, or 0.0055 lb-VOC/MMBtu. [District NSR Rule]

19. Emissions from the regenerative thermal oxidizers shall not exceed any of the following limits: 0.1 lb-NOx/MMBtu, 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 0.084 lb-CO/MMBtu, or 0.0055 lb-VOC/MMBtu. [District NSR Rule]

20. Permittee shall maintain a current file of coatings, inks, adhesives, fountain solutions, wash primers, and solvents in use and in storage. File shall included material safety data sheet (MSDS) or product data sheet showing the material name, manufacturer's name, VOC content as applied, mixing instruction, density, and composite vapor pressure. [District Rule 4607, 6.1.1]

21. The permittee shall record on a daily basis, the type and amount of each coating, adhesive, fountain solution, wash primer, and solvent used. [District Rules 2201 & 4607, 6.1.2.2]

22. 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 (12/20/01 version of Rule 4607). [District Rule 4607, 6.1.2.1]

23. 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) for each drying oven and each thermal oxidizer at the facility. [District Rules 1070, 4.0 and 2520, 9.3.2]

24. The permittee shall maintain daily records of the thermal oxidizers operational temperature. [District Rule 2520, 9.3.2 and CFR Part 64]

25. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 2520, 9.4.2 and 4607, 6.1.6]

26. 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]

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, 7.1]

28. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081, 7.3]
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, 6.4.4]

30. 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]

31. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR part 64.7. [40 CFR part 64]

32. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR part 64.9. [40 CFR part 64]

33. 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]
PERMIT UNIT: N-1646-25-3

EXPIRATION DATE: 09/30/2008

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

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit

2. The drying ovens and regenerative thermal oxidizers shall be fired exclusively on natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit

3. The drying ovens serving the heatset offset printing press shall be maintained under negative pressure and shall be vented through the 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
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 74.1 pounds in any one day. [District NSR Rule] Federally Enforceable Through Title V Permit

16. 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

17. 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

18. PM10 emissions from the drying oven shall not exceed 0.0076 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit

19. SOx emissions from the drying oven shall not exceed 0.00285 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit

20. VOC emission from the drying oven shall not exceed 0.0055 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit

21. 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

22. 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

23. PM10 emissions from the regenerative thermal oxidizers shall not exceed 0.0076 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit

24. SOx emissions from the regenerative thermal oxidizers shall not exceed 0.00285 lbs/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit

25. VOC emissions from the regenerative thermal oxidizer shall not exceed 0.0055 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.
26. 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 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

28. 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

29. All test results for NOx and CO shall be reported in ppmv @ 19% O2 (or no correction if measured above 19% O2), corrected to dry stack conditions. [District Rule 4309, 6.3.7] Federally Enforceable Through Title V Permit

30. NOx 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

31. 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

32. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4309, 6.2] Federally Enforceable Through Title V Permit

33. 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

34. 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

35. 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

36. 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

37. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rule 4309, 5.4] Federally Enforceable Through Title V Permit

38. 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, 5.4] Federally Enforceable Through Title V Permit
39. 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

40. 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, 5.4] Federally Enforceable Through Title V Permit

41. 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

42. 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

43. 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

44. 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

45. 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

46. 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

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. 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

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.
PERMIT UNIT REQUIREMENTS

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit

2. The drying ovens and regenerative thermal oxidizers shall be fired exclusively on natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit

3. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of natural gas combusted in the regenerative thermal oxidizer 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 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

5. 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

6. The 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

7. 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

8. 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

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, 5.8.1] Federally Enforceable Through Title V Permit

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

Facility Name: WORLDCOLOR (USA) LLC
Location: 2201 COOPER AVE, MERCED, CA 95348
N-1646-26-4: Sep 1 2010 11:27AM - SBARD
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, 5.8.3] 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, 5.8.4] 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, 5.8.5] Federally Enforceable Through Title V Permit

13. 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

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, 5.10] Federally Enforceable Through Title V Permit

15. 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

16. VOC emissions from the printing inks and solvents shall not exceed 61.4 pounds in any one day. [District NSR Rule] Federally Enforceable Through Title V Permit

17. 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. PM10 emissions from the drying oven shall not exceed 0.0076 lb/MBtu. [District Rule 2201] Federally Enforceable Through Title V Permit

20. SOx emissions from the drying oven shall not exceed 0.00285 lb/MBtu. [District Rule 2201] Federally Enforceable Through Title V Permit

21. VOC emission from the drying oven shall not exceed 0.0055 lb/MBtu. [District Rule 2201] Federally Enforceable Through Title V Permit

22. NOx emissions from the regenerative thermal oxidizer shall not exceed 4.3 ppmvd @ 19% O2 (referenced as NO2). [District Rules 2201 & 4309, 5.2] Federally Enforceable Through Title V Permit
23. CO emissions from the regenerative thermal oxidizer shall not exceed 25.0 ppmvd @ 19% O2. [District Rules 2201 & 4309, 5.2] Federally Enforceable Through Title V Permit

24. The PM10 emissions rate from the regenerative thermal oxidizer shall not exceed 0.01 lb/MBtu. [District Rule 2201] Federally Enforceable Through Title V Permit

25. The SOx emissions rate from the regenerative thermal oxidizer shall not exceed 0.00285 lbs/MBtu. [District Rule 2201] Federally Enforceable Through Title V Permit

26. The VOC emissions rate from the regenerative thermal oxidizer shall not exceed 0.02 lb/MBtu. [District Rule 2201] Federally Enforceable Through Title V Permit

27. The total quantity of natural gas used in the thermal oxidizer shall not exceed 25.0 million cubic feet in any one calendar year. [District Rule 2201] Federally Enforceable Through Title V Permit

28. 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, 6.4.7] Federally Enforceable Through Title V Permit

30. 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

31. All test results for NOx and CO shall be reported in ppmv @ 19% O2 (or no correction if measured above 19% O2), corrected to dry stack conditions. [District Rule 4309, 6.3.7] Federally Enforceable Through Title V Permit

32. NOx 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

33. 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

34. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4309, 6.2] 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, 5.5.1 & 5.5.2] 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, 5.5.6] 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 NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rule 4309, 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.
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, 5.4] 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, 5.4] 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, 5.4] 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, 6.1.1] 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 4607, 6.1.3] 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, 6.1.2.1] 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, 6.1.2.2] 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, 6.1.2.3] 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) Operaitonal temperature of the regenerative 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 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

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, 2520, and 4607, and 4309] Federally Enforceable Through Title V Permit
51. 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

52. 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

53. 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

54. 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.

Facility Name: WORLDCOLOR (USA) LLC
Location: 2201 COOPER AVE, MERCED, CA 95348
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. [District Rule 4702] 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 and 17 CCR 93115] 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 and 17 CCR 93115] Federally Enforceable Through Title V Permit

5. 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 and 17 CCR 93115] Federally Enforceable Through Title V Permit

6. 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

7. 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]

8. 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.
PERMIT UNIT REQUIREMENTS

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit

2. The drying ovens and regenerative thermal oxidizers shall be fired exclusively on natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit

3. The drying ovens serving the heatset offset printing press shall be maintained under negative pressure and shall be vented through the 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

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 50.0 pounds in any one day. [District NSR Rule] Federally Enforceable Through Title V Permit

18. 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

19. 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

20. PM10 emissions from the drying oven shall not exceed 0.0076 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit

21. SOx emissions from the drying oven shall not exceed 0.00285 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit

22. VOC emission from the drying oven shall not exceed 0.0055 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit

23. 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
24. 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

25. PM10 emissions from the regenerative thermal oxidizers shall not exceed 0.0076 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit

26. SOX emissions from the regenerative thermal oxidizers shall not exceed 0.00285 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit

27. VOC emissions from the regenerative thermal oxidizer shall not exceed 0.0055 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit

28. The total quantity of natural gas used in the drying ovens under this permit unit shall not exceed 18.7 million cubic feet in any one calendar year. [District Rule 2201] Federally Enforceable Through Title V Permit

29. 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

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. 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

32. All test results for NOx and CO shall be reported in ppmv @ 19% O2 (or no correction if measured above 19% O2), corrected to dry stack conditions. [District Rule 4309, 6.3.7] Federally Enforceable Through Title V Permit

33. NOx 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

34. 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

35. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4309, 6.2] Federally Enforceable Through Title V Permit

36. 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

37. 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

38. 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

39. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit

40. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rule 4309, 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.
41. 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, 5.4] Federally Enforceable Through Title V Permit

42. 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

43. 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, 5.4] Federally Enforceable Through Title V Permit

44. 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

45. 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

46. 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

47. 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

48. 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

49. 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

50. 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

51. 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
52. 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

53. 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

54. 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

55. 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.
PERMIT UNIT REQUIREMENTS

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit

2. The drying ovens and regenerative thermal 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.

Facility Name: WORLDCOLOR (USA) LLC
Location: 2201 COOPER AVE, MERCED, CA 95348
N-1646-37-2: Sep 1 2010 11:27AM - BRARG
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 50.0 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit

19. NOx emissions from the drying ovens shall not exceed 4.3 ppmvd @ 19% O2 (referenced as NO2) or 0.0492 lb-NOx/MMBtu. [District Rules 2201 & 4309] Federally Enforceable Through Title V Permit

20. CO emissions from the drying ovens shall not exceed 25.0 ppmvd @ 19% O2 or 0.174 lb-CO/MMBtu. [District Rules 2201 & 4309] Federally Enforceable Through Title V Permit

21. PM10 emissions from the drying ovens shall not exceed 0.0076 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit

22. SOx emissions from the drying ovens shall not exceed 0.00285 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit

23. VOC emission from the drying ovens shall not exceed 0.0055 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit

24. NOx emissions from the regenerative thermal oxidizer shall not exceed 4.3 ppmvd @ 19% O2 (referenced as NO2) or 0.0492 lb-NOx/MMBtu. [District Rules 2201 & 4309] Federally Enforceable Through Title V Permit

25. CO emissions from the regenerative thermal oxidizer shall not exceed 25.0 ppmvd @ 19% O2 or 0.174 lb-CO/MMBtu. [District Rules 2201 & 4309] Federally Enforceable Through Title V Permit
26. PM10 emissions from the regenerative thermal oxidizer shall not exceed 0.01 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit

27. SOx emissions from the regenerative thermal oxidizer shall not exceed 0.00285 lbs/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit

28. VOC emissions from the regenerative thermal oxidizer shall not exceed 0.02 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit

29. The total quantity of natural gas used in the drying ovens under this permit unit shall not exceed 137,000 cubic feet in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit

30. 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

31. 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

32. 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

33. 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

34. 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] Federally Enforceable Through Title V Permit

35. All test results for NOx and CO shall be reported in ppmv @ 19% O2 (or no correction if measured above 19% O2), corrected to dry stack conditions. [District Rule 4309] Federally Enforceable Through Title V Permit

36. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis. [District Rule 4309] Federally Enforceable Through Title V Permit

37. 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

38. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4309] Federally Enforceable Through Title V Permit

39. 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

40. 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

41. 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

42. 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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.
43. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rule 4309] Federally Enforceable Through Title V Permit

44. 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

45. 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

46. 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

47. 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

48. 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

49. 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

50. 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

51. 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

52. 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

53. 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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.
54. 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
San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: N-1646-38-4
EXPIRATION DATE: 09/30/2008

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

PERMIT UNIT REQUIREMENTS

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
2. The drying ovens and regenerative thermal oxidizers shall be fired exclusively on natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
3. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of natural gas combusted in each drying oven shall be installed, utilized and maintained. [District Rules 2201] Federally Enforceable Through Title V Permit
4. The drying ovens serving the heatset offset printing press shall be maintained under negative pressure and shall be vented through the thermal oxidizer at all times except during periods of start-up while the dryers are being air purged. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
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 operated at a minimum temp. of 1400 deg. F. The incinerator shall be preheated to 1400 deg. F prior to the start-up of the heatset offset printing operation. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Each thermal oxidizer shall be equipped with an operational continuous temperature monitoring and recording instrument. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The VOC content of the materials shall not exceed the following: inks less than 45% VOC by weight (less water and exempt compounds) and fountain solutions less than 15% by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The VOC content of organic solvents used to perform surface preparation or solvent cleaning shall not exceed the VOC content limits specified in Table 7 of Rule 4607 (Graphic Arts and Paper, Film, Foil, and Fabric Coatings - 12/18/08 version). [District Rule 4607, 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. VOC emissions from the printing inks and solvents shall not exceed 50.0 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit

18. NOx emissions from the drying ovens shall not exceed 4.3 ppmvd @ 19% O2 (referenced as NO2). [District Rules 2201 & 4309, 5.2] Federally Enforceable Through Title V Permit

19. CO emissions from the drying ovens shall not exceed 25.0 ppmvd @ 19% O2. [District Rules 2201 & 4309, 5.2] Federally Enforceable Through Title V Permit

20. Emissions from the drying ovens 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 NSR Rule] Federally Enforceable Through Title V Permit

21. 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

22. 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

23. 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 NSR Rule] Federally Enforceable Through Title V Permit

24. 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.
25. 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

26. 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

27. 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

28. 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

29. All test results for NOx and CO shall be reported in ppmv @ 19% O2 (or no correction if measured above 19% O2), corrected to dry stack conditions. [District Rule 4309, 6.3.7] Federally Enforceable Through Title V Permit

30. NOx 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

31. 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

32. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4309, 6.2] Federally Enforceable Through Title V Permit

33. 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

34. 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

35. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 15 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

36. 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

37. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rule 4309, 5.4] Federally Enforceable Through Title V Permit

38. 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, 5.4] Federally Enforceable Through Title V Permit
39. 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

40. 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, 5.4] Federally Enforceable Through Title V Permit

41. 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

42. 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

43. 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

44. 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

45. 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

46. 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

47. 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

48. 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

49. 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

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 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

52. 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.

Facility Name: WORLDCOLOR (USA) LLC
Location: 2231 COOPER AVE, MERCED, CA 95348

n-1646-38-4 Sep 1 2016 11:27AM - 85ARG
53. 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

54. 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-1646-39-2
EXPIRATION DATE: 09/30/2008

EQUIPMENT DESCRIPTION:
GRAPHIC ARTS PRINTING OPERATION CONSISTING OF ONE MAN ROLAND MODEL ROTOMAN N 38" WIDE 5-COLOR HEATSET OFFSET LITHOGRAPHIC PRINTING PRESS (PRESS #524) WITH ONE 4.587 MMBTU/HR NATURAL GAS FIRED THERMO WISCONSIN MODEL APOLLO A3100 DRYING OVEN SERVED BY THE SHARED 5.728 MMBTU/HR MEGTEC CLEANSWITCH MODEL CS-300-95 NATURAL GAS FIRED REGENERATIVE THERMAL OXIDIZER

PERMIT UNIT REQUIREMENTS

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule] 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 NSR Rule] 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 NSR Rule] 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 NSR Rule] 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 NSR Rule] Federally Enforceable Through Title V Permit

10. The thermal oxidizer shall be equipped with an operational continuous temperature monitoring and recording instrument. [District NSR Rule] 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

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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 50.0 pounds in any one day. [District NSR Rule] Federally Enforceable Through Title V Permit

19. NOx emissions from the drying oven shall not exceed 4.3 ppmvd @ 19% O2 (referenced as NO2). [District Rule 2201] Federally Enforceable Through Title V Permit

20. CO emissions from the drying oven shall not exceed 25.0 ppmvd @ 19% O2. [District Rule 2201] Federally Enforceable Through Title V Permit

21. Emissions from the drying oven shall not exceed any of the following limits: 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, or 0.0055 lb-VOC/MMBtu. [District NSR Rule] Federally Enforceable Through Title V Permit

22. NOx emissions from the regenerative thermal oxidizer shall not exceed 4.3 ppmvd @ 19% O2 (referenced as NO2). [District Rule 2201] Federally Enforceable Through Title V Permit

23. CO emissions from the regenerative thermal oxidizer shall not exceed 25.0 ppmvd @ 19% O2. [District Rule 2201] Federally Enforceable Through Title V Permit

24. Emissions from the regenerative thermal oxidizer shall not exceed any of the following limits: 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, or 0.0055 lb-VOC/MMBtu. [District NSR Rule] Federally Enforceable Through Title V Permit
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 NSR Rule] Federally Enforceable Through Title V Permit

26. The total quantity of natural gas used in the thermal oxidizer shall not exceed 25,000 million cubic feet in any one calendar year. [District NSR Rule] 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 NSR Rule] 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

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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