

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: On-site Inspection

N169863364

<b>FACILITY:</b> Walsworth Publishing Company (formerly IPC)		<b>SRN / ID:</b> N1698
<b>LOCATION:</b> 2180 MAIDEN LANE, SAINT JOSEPH		<b>DISTRICT:</b> Kalamazoo
<b>CITY:</b> SAINT JOSEPH		<b>COUNTY:</b> BERRIEN
<b>CONTACT:</b> Jeff Crouse , Prepress and Digital Print Manager		<b>ACTIVITY DATE:</b> 06/22/2022
<b>STAFF:</b> Matthew Deskins	<b>COMPLIANCE STATUS:</b> Non Compliance	<b>SOURCE CLASS:</b> SM OPT OUT
<b>SUBJECT:</b> Unannounced Scheduled Inspection		
<b>RESOLVED COMPLAINTS:</b>		

On June 22, 2022 AQD staff (Matt Deskins) went to conduct an unannounced scheduled inspection of the Walsworth Publishing Company (N1698) (Formerly IPC Print Services) facility located in St. Joseph, Berrien County. According to district file information, Walsworth is a printing company with an opt-out permit (PTI No. 232-971) for HAPs issued to them by the AQD for their equipment and operations. The purpose of the inspection was to determine the facilities compliance with their and any other state or federal air regulations. Staff departed for the facility at approximately 9:10 a.m.

Staff arrived at the facility at approximately 10:20 a.m. Prior to entering the building staff looked to see if any visible emissions could be observed and none were noted. Staff then proceeded into the office area where they introduced them self to an employee (Donna Ray), stated the purpose of the visit, and asked if Jeff Crouse was available. Staff had met with Jeff during the previous inspection after he had taken over for Lee Myers. Donna stated that Jeff was there and then proceeded to contact him. Jeff and then Phil Archer (Plant General Manager) came out to the lobby to greet staff several minutes later. Staff then introduced them self and stated the purpose of the visit. Phil then asked if we could all sit down in a conference room where staff could explain what they were going to do so he could report it to their corporate office. Staff stated that was fine and we proceeded to a conference room. Once in the conference room, staff explained to Jeff and Phil their current permit status with us as an "Opt-Out" source and what the EPA requires of the AQD as far as inspection frequencies and quotas. I mentioned that since they were an "Opt-Out" source that we were required, at a minimum, to inspect those sources every 5 years. I went on to mention that they were on our schedule to inspect for this fiscal and year and that we are required to do unannounced inspections. Staff then mentioned that the inspection would entail looking over records required to be kept by their permit as well taking a walk through of the plant to view operations. Phil said that would be fine and that Jeff could handle things from there and then he excused himself from the meeting. He told staff to let him know if they needed anything from him prior to his departing and staff said that they would. After Phil left Jeff asked if we could continue the conversation up in his office. Staff said that would be fine and we proceeded there. Once in Jeff's office, the following is a summary of staff's discussions with Jeff, the facility walk-through, and the facilities compliance status with the conditions contained within PTI No. 232-971.

According to Jeff, Walsworth is still strictly a printing operation and the bulk of their business is still monthly publications such as magazines although they do a lot of catalogs as well. He said that the average run for one of their printing jobs is still 6,500 finished products. He went on to say that they are currently operating 1 press (EUM-2000) 24/7 but the rest of their operations are typically 3 shifts 5 days a week plus overtime. They currently employ approximately 170 people but are trying to hire more. He said business has been steady and there is more work out there available, but they can't take on more currently due to space and staffing. Staff then showed Jeff the section of their most recent permit, issued in October 2019, that lists the emission units and asked if they've added or removed any of the equipment since the permit was issued. Jeff said all the equipment was the same except that the one press identified as EUM-1000A was removed back in December 2021.

Staff then asked about the inks used at the facility and if any have been added or changed. Jeff stated that they are back to using Central Ink as their supplier instead of Flint Ink. Staff asked when that took place and if their record keeping spreadsheets took into account any changes in VOC content. Jeff said the change occurred approximately 6 months ago and a quick look at the spreadsheet on his computer appeared to indicate it had accounted for the new inks being used. Staff then asked Jeff if he would e-mail staff their 12-month rolling recordkeeping spreadsheets, the spreadsheets used for calculating emissions, and the SDS sheets for the Central Inks that are used. Staff said it would be easier for them to review back at their office and Jeff said he would send them. Jeff later e-mailed staff records on June 27<sup>th</sup>. Staff then asked if the mixing ratios of the fountain solutions were still the same and he said they were. Staff had been told during previous inspections that the fountain solutions were mixed at a ratio of 4 to 6 ounces to 1 gallon of R.O. Water. Staff then asked Jeff if he knew if the manufacturer of Central Inks uses Method 24 analysis to determine VOC content. Jeff stated he wasn't sure but would look into it. Staff then mentioned that depending on what the SDS indicates, we may request that they test a few of their most widely used products again. Staff then asked about the three RTOs and the recording of combustion temperatures. The remaining Harris Press (EUM-1000A2) exhausts to the stand alone RTO unit that is located outside and the two Goss Sunday 2000 presses (EUM-2000 and EUM-20002) are equipped with integrated / internal ECOOL Thermal Oxidizers. Jeff said that all combustion temperatures are recorded electronically (Yokogawa Data Loggers) and that plant maintenance personnel download the data quarterly and they can access it on computer. Staff then asked about the Malfunction Abatement Plan (MAP) that was developed for all RTO units. Jeff said that they still have it and follow it along with having a company called Contiweb come out and do annual inspections / maintenance on the RTO and ECOOL units. Staff then asked if the new press (EUM-20002) had ever been stack tested because staff doesn't recall seeing any test plan or test report being submitted. Jeff said the thought it had been tested but wasn't 100% sure. He said that he would follow up on that.

Staff then proceeded with Jeff on a tour of the facility and their operations. Our first stop was at the area in the facility, referred to by Jeff as Building 3, that houses the Heidelberg Presses and the Ink Jet printers. All of this equipment was originally installed under the Rule 290 permit exemption, but staff noted during a previous inspection that they exceeded the allowable monthly emissions, so they modified their permit to include these units in it. The ink jet printers use all black ink and are strictly used for the printing of mailing labels. Jeff had stated that the ink jet department still operates 1 shift 5 days per week. The two Heidelberg Presses (EUSheetFed-02 and EUSheetFed-08) are off-set lithographic presses which can only print one side of a sheet of paper at a time and then has to be manually flipped. The paper comes in bulk and some has to be cut into sheets prior to being fed into the presses. According to Jeff, Heidelberg Sheetfed Press H8 (8 Color) operates 2 shifts, 5 days per week and the Heidelberg Sheetfed Press H5 (5 Color) isn't used very much. According to Jeff, the presses still use cyan, blue, magenta, yellow, and black inks 99% of the time that comes in 5-gallon buckets. As mentioned earlier, the ink is being supplied again by Central Ink. Jeff stated that these inks may still be used in the other printing presses when spot colors are needed (a.k.a. tinting). The sheetfed press referred as the Coater is for Ultra Violet printing applications. Jeff said that both H5 and the Coater are operated by 1 employee since they aren't used very much.

Staff then proceeded Jeff to the area of the facility that they refer to Building 2 and houses the web presses. These are designated EUM-1000A2, EUM-2000, and EUM-20002. As mentioned previously, M1000A2 has its emissions controlled by the RTO that is located outside the plant. EUM-2000 and EUM-20002 each has their own integrated / internal RTO as mentioned earlier. All these presses use ink that comes in 330-gallon Totes that get piped/pumped to the various presses. The inks are the same colors as the ones used in the Heidelberg Presses but different formulations are used in M1000A2 do to the press method. Jeff said that they still don't use any special formulations on the EUM-2000 or EUM-20002

unit. The web presses also use paper that comes on a big roll that doesn't need to be pre-cut. The following is a summary of the various web presses and their operations:

**M1000A2:** This unit is known as a ten unit double web press which staff had been told meant it could print up to 5 colors per side on a job if necessary as well as run two rolls of printing paper at the same time. The basic printing process consists of the ink being applied to rollers, the rollers then transfer it onto a metal plate where fountain solutions are added, it then gets transferred onto a rubber blanket that eventually applies it to the paper. After the printing is accomplished the paper passes through a gas fired dryer and then to a pre-tensioner. The pre-tensioner keeps the adequate tension of the paper for folding and cutting. After it is cut, it then heads to the finishing operation where it gets turned into a magazine or catalog. The emissions from this press are directed to the regenerative thermal oxidizer (RTO) that is located outside. Jeff said that this unit isn't used very much and noted that it was only used for 40 hours back in February and 96 hours in March. It wasn't in use during staff's inspection.

Staff then proceeded with Jeff to the RTO controls for the one located outside. Staff noted it wasn't currently operating and the temperature indicated 244 degrees Fahrenheit. Staff had noted previously that it is equipped with a data logger/recording device (Yokogawa FX1000) where back in the day it had a strip chart. As mentioned earlier, they are able to pull up the monitoring data on a computer and staff observed some past data on a computer in the maintenance personnel area. Todd (Maintenance Employee) assisted us with pulling up the data.

**EUM-2000:** This unit is a Goss Sunday 2000 Single Web Press with a built in ECOCOOL System. It was operational during staff's inspection and staff noted the combustion temperature of the internal RTO was 770 degrees C (1418 F). Jeff said that this unit is larger than the new one and has a 54-inch web.

**EUM-2002A:** This unit is also a Goss Sunday 2000 Single Web Press with a built in ECOCOOL System. It was operational during staff's inspection and staff noted the combustion temperature of the internal RTO was 780 degrees C (1436 F). Jeff said that this unit has a 40-inch web.

Staff had asked Jeff previously if they had made any changes to the chemical storage room where they store their waste products. Jeff said that they haven't and that USIT out of Livonia, MI picks up their waste as needed. Jeff said that USIT hauls it to Stericycle for destruction and the facility will get records sent to them indicating this. Jeff stated that most of their waste is still considered liquid industrial but the press wash waste is still considered hazardous. He said that they are designated as a Small Quantity Generator. He also said that they dispose of everything and don't do any reclaiming of any materials.

Staff had also asked Jeff previously about the Recycle Room and if there had been any changes to which Jeff stated there hadn't been. In the Recycle Room, all the paper scraps from any trimming/grinding of the paper is collected by a network of ducts and ultimately baled together. They then sell the bales for recycling. The emissions from this operation are controlled by a cyclone and two baghouses. It is a closed loop system and nothing is vented outside. This process would be exempt under the AQD Rule 285(vi) permit exemption. Staff then mentioned that some of staff's last correspondence with the facility had been with their Consultant (Villa Environmental) about possibly installing a new paper shredder and using an AQD permit exemption to do it. Jeff mentioned that the shredder was never installed.

Staff's last stop was at what they refer to as Building 1 and it houses their binding and finishing area where they use two different processes to bind magazines, catalogs, manuals, etc. together. One process is called saddle stitch which uses a staple binding to hold things together. The other one uses hot melt glue that the binding passes through to hold the

finish product together. The hot glue process is exempt under Rule 287(i). They currently have two hot glue binding processes and three saddle stitch binding processes. One of the hot glue processes has the ink jet printer known as Domino and two of the saddle stitch processes have ink jet printers installed on them.

Staff then proceeded with Jeff out to reception area. Staff concluded the on-site inspection by informing Jeff that there were potential violations that staff noted including for not conducting the stack test on the new unit, for not notifying us within 30 days of its installation, and that there could possibly be more depending on our records review. Jeff stated he understood. Staff thanked Jeff for his time, signed out, and departed the facility at approximately 1:20 p.m.

**NOTE:** Staff and Jeff both confirmed later that day that the stack testing hadn't been performed on EUM-20002 as required within 180 days of commencement of trial operations.

As mentioned earlier, staff received the records from Jeff on June 27<sup>th</sup>. The following lists the special conditions PTI No. 232-971 and their compliance status with them.

### EMISSION UNIT SPECIAL CONDITIONS

#### EMISSION UNIT SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation	Flexible Group ID
		Date / Modification Date	
EUM-1000A2	Harris M-1000A2 – 10 Units, Double Web Offset Press, Two Stage Dryer Ovens, and Automatic Blanket Wash System Controlled By a Regenerative Thermal Oxidizer (RTO).	10-01-2004	FGWebFed
EUM-1000A	Harris M-1000A – Double Web Press, Double Dryer Ovens, and Automatic Blanket Wash System. Controlled By a Regenerative Thermal Oxidizer (RTO).	07-01-2000	FGWebFed
EUM-20002	Goss Sunday 2000 – Single Web Press with a built-in ECOCOOL/T105-1460 System	TBD	FGWebFed
EUM-2000	Goss Sunday 2000 – Single Web Press with a built-in ECOCOOL/T105-1460 System	05-01-2015 01-12-2016	FGWebFed
EUSheetFed-02	Heidelberg HB102SP 5/c, Sheetfed 5-Color Offset Press.	08-01-1998	FGSheetFed

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation	Flexible Group ID
		Date / Modification Date	
EUSheetFed-05	Coater	03-01-1993	FGSheetFed
EUSheetFed-08	Heidelberg SM 102-8-PS 40", Sheetfed 8-Color Offset Press.	03-01-2015	FGSheetFed
EUInkJet-01	Sitma 1 Ink Jet Printer.	06-01-1994	FGInkJet
EUInkJet-02	Sitma 2 Ink Jet Printer	04-01-1991	FGInkJet
EUInkJet-03	Domino Ink Jet Printer	03-01-2000	FGInkJet
EUInkJet-04	Bitjet Ink Jet Printer	03-01-2015	FGInkJet
EUInkJet-05	Bitjet Ink Jet Printer	01-01-2018	FGInkJet

Changes to the equipment described in this table are subject to the requirements of R 336.1201, except as allowed by R 336.1278 to R 336.1291.

#### FLEXIBLE GROUP SPECIAL CONDITIONS

#### FLEXIBLE GROUP SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Flexible Group ID	Flexible Group Description	Associated
		Emission Unit IDs
FGWebFed	Four (4) Webfed Heatset Offset Lithographic Printing Presses. The Harris presses (EUM-1000A2 & EUM-1000A) are controlled by a regenerative thermal oxidizer (RTO), and the Goss Sunday presses (EUM-2000 and EUM-20002) are controlled by its own built-in ECOCOL system.	EUM-1000A2, EUM-1000A, EUM-2000, EUM-20002
FGSheetFed	Two (2) Sheetfed Offset Lithographic Printing Presses and One (1) Coater.	EUSheetFed-02, EUSheetFed-05, EUSheetFed-08

<b>Flexible Group ID</b>	<b>Flexible Group Description</b>	<b>Associated Emission Unit IDs</b>
<b>FGInkJet</b>	<b>Five (5) Ink Jet Printers</b>	<b>EUInkJet-01, EUInkJet-02, EUInkJet-03, EUInkJet-04, EUInkJet-05</b>

<b>FGWebFed</b> <b>FLEXIBLE GROUP CONDITIONS</b>
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**DESCRIPTION**

Four (4) Webfed Heatset Offset Lithographic Printing Presses. The Harris presses (EUM-1000A2 & EUM-1000A) are controlled by a regenerative thermal oxidizer (RTO), and the Goss Sunday presses (EUM-2000 and EUM-20002) are controlled by its own built-in ECOCOOOL system.

Emission Unit: EUM-1000A2, EUM-1000A, EUM-2000, EUM-20002

**POLLUTION CONTROL EQUIPMENT**

A Regenerative Thermal Oxidizer (RTO) and two ECOCOOOL Systems

**I. EMISSION LIMIT(S)**

<b>Pollutant</b>	<b>Limit</b>	<b>Time Period / Operating Scenario</b>	<b>Equipment</b>	<b>Monitoring / Testing Method</b>	<b>Underlying Applicable Requirements</b>
<b>1. VOC</b>	<b>15.0 tpy</b>	<b>12-month rolling time period as determined at the end of each calendar month</b>	<b>FGWebFed</b>	<b>SC VI.3</b>	<b>R 336.1702(a)</b>
<b>2. kerosine, hydro- desulfurized  (Cas No. 64742-81-0)</b>	<b>3.9 tpy</b>	<b>12-month rolling time period as determined at the end of each calendar month</b>	<b>FGWebFed</b>	<b>SC VI.4</b>	<b>R 336.1225(1)</b>

**AQD Comment: Appears to be in COMPLIANCE. Records reviewed ending May of 2022 indicate VOC emissions at 5.122 and kerosine at 0.479 tons.**

## **II. MATERIAL LIMIT(S)**

1. All printing press-related blanket and roller washes (cleaning solvents) shall have VOC composite partial vapor pressures that do not exceed 10 mmHg @ 20°C (68°F) or contain less than 30% VOC by weight. (R 336.1702(a))

**AQD Comment: Appears to be in COMPLIANCE. The blanket and roller washes all have pressures that do not exceed 10 mmHg and staff noted that all blanket and roller washes used contained 31% more of VOC by weight.**

## **III. PROCESS/OPERATIONAL RESTRICTION(S)**

1. All VOC-containing inks, fountain solution, coatings, cleaning solvents such as blanket and roller washes, used shop towels, etc. (materials) shall be stored in closed containers and disposed of in an acceptable manner, in compliance with all applicable state rules and federal regulations. (R 336.1224, R 336.1225, R 336.1702(a))

**AQD Comment: Appears to be in COMPLIANCE. Staff did not observe any housekeeping issues related to the above.**

1. The permittee shall handle all VOC and/or HAP containing materials, in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary. (R 336.1224, R 336.1225, R 336.1702(a))

**AQD Comment: Appears to be in COMPLIANCE. Staff did not observe any housekeeping issues related to the above.**

1. The permittee shall not operate FG-WebFed unless a malfunction abatement plan (MAP) for an RTO and two ECOCOOOL Systems unless a malfunction abatement plan (MAP) as described in Rule 911(2), is implemented and maintained. The MAP shall, at a minimum, specify the following:
  - a. A complete preventative maintenance program including identification of the supervisory personnel responsible for overseeing the inspection, maintenance, and repair of air-cleaning devices, a description of the items or conditions that shall be inspected, the frequency of the inspections or repairs, and an identification of the major replacement parts that shall be maintained in inventory for quick replacement.
  - b. An identification of the sources and air cleaning operating variables that shall be monitored to detect a malfunction or failure, the normal operating range of these variables, and a description of the method of monitoring or surveillance procedures.
  - c. A description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits.
  - d. A description of the procedures to capture, handle and dispose of all materials to minimize the generation of fugitive emissions per SC III.1 and III.2.

**If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days, if new equipment is installed or upon request from the District Supervisor. The permittee shall submit the MAP and any amendments to the MAP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve**

compliance with all applicable emission limits. (R 336.1205, R 336.1225, R 336.1702(a), R 336.1910, R 336.1911)

AQD Comment: Appears to be in COMPLIANCE with the above.

#### IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate EUM-1000A2 and EUM-1000A unless the RTO is installed, maintained and operated in a satisfactory manner. Satisfactory operation of the RTO includes a minimum VOC destruction efficiency of 95 percent (by weight), a minimum retention time of 0.5 seconds, a minimum combustion temperature of 1450°F or at the minimum temperature during the most recent control device performance test which demonstrates compliance with a minimum of 95 percent destruction efficiency, and in accordance with the MAP required in SC III.3. (R 336.1205, R 336.1702(a), R 336.1910)

AQD Comment: Appears to be in COMPLIANCE with the above. As mentioned earlier, EUM-1000A has been removed so only EUM-1000A2 is controlled by the RTO. The press wasn't operating during staff's inspection so the RTO wasn't either. The RTO meets the destruction efficiency requirement and records reviewed by staff indicate its combustion temperature is always above 1450 degrees F when it's operated.

2. The permittee shall not operate EUM-1000A2 and EUM-1000A unless the dryers are installed, maintained and operated in a satisfactory manner. Satisfactory operation requires that the dryers are operating at a pressure lower than all adjacent areas, so that air flows into the enclosure through all natural draft openings (NDOs). NDO is defined as any opening that is not connected to a duct in which a fan or blower is installed. This shall be achieved by using the existing built-in interlock system which will trigger automatically and shuts off the appropriate press if the dryer is not operating in negative pressure. (R 336.1205, R 336.1702(a), R 336.1910)

AQD Comment: Appears to be in COMPLIANCE with the above. As previously mentioned, EUM-1000A has been removed.

3. The permittee shall install, calibrate, maintain and operate a temperature monitoring device in the combustion chamber of the RTO in a satisfactory manner. The monitoring device shall monitor the temperature on a continuous basis during the operation of EUM-1000A2 and EUM-1000A. (R 336.1205, R 336.1702(a))

AQD Comment: Appears to be in COMPLIANCE. The RTO is equipped with an Yokogawa electronic data logger that is downloaded monthly onto a computer.

4. The permittee shall not operate EUM-2000 and/or EUM-20002 unless each ECOCOOL System is installed, maintained and operated in a satisfactory manner. Satisfactory operation of each ECOCOOL System includes a minimum VOC destruction efficiency of 95 percent (by weight), a minimum retention time of 0.6 seconds, a minimum combustion temperature of 1450°F or at the minimum temperature during the most recent control device performance test which demonstrates compliance with a minimum of 95 percent destruction efficiency, and in accordance with the MAP required in SC III.3. (R 336.1205, R 336.1702(a), R 336.1910)

AQD Comment: Staff will consider them to be in COMPLIANCE. EUM-2000 was tested in September of 2016 and had a destruction efficiency of 98% with an average combustion temperature of 1417-1418 degrees F. During the inspection staff noted it was being operated at 770 degrees C which equates to 1418 degrees F. EUM-20002 has not been tested to date, so the 1450 degree F temperature would be the minimum temperature it needs to be operated at. Staff noted during the inspection that it was being operated at



780 degrees C which equates to 1436 degrees F. Although this is under the 1450 degree requirement, this unit is identical in design to the other unit so staff will assume that it's meeting the destruction efficiency. Although not discussed yet, a VN will be sent for not stack testing the newer unit within the required timeframes.

5. The permittee shall not operate each ECOCOOL System for EUM-2000 and EUM-20002 unless each system is operating at a pressure lower than all adjacent areas, so that air flows into the enclosure through all natural draft openings (NDOs). NDO is defined as any opening that is not connected to a duct in which a fan or blower is installed. This shall be achieved by using the automatic shutdown for the entire press in event of a malfunction. (R 336.1205, R 336.1702(a), R 336.1910)

AQD Comment: Appears to be in COMPLIANCE with the above. The units will automatically shutdown if any malfunctions in its operation occur.

6. The permittee shall install, calibrate, maintain and operate a temperature monitoring device in the combustion chamber of each ECOCOOL System in a satisfactory manner. The monitoring device shall monitor the temperature on a continuous basis during the operation of EUM-2000 and/or EUM-20002. (R 336.1205, R 336.1702(a))

AQD Comment: Appears to be in COMPLIANCE. The RTO's for both units are equipped with Yokogawa electronic data loggers that is downloaded monthly onto a computer.

## **V. TESTING/SAMPLING**

**Records shall be maintained on file for a period of five years. (R 336.1201(3))**

1. The permittee shall verify the VOC content of any ink, coating, fountain solution, *etc.* (material), as received and as applied, using federal Reference Test Method 24 or 24A pursuant to Rule 1040(5). Upon prior written approval by the AQD District Supervisor, VOC content may be determined from manufacturer's formulation data. If the Method 24 or 24A and the formulation values should differ, the Method 24 or 24A results shall be used to determine compliance. (R 336.1702(a), R 336.2001, R 336.2003, R 336.2004, R 336.2040 (5))

AQD Comment: Will consider them to be in COMPLIANCE. The facility tested several products following the previous inspection back in 2018 and the lab used stated that they were all within the limits stated in their respective SDS's. Since the facility switched back to their original ink supplier, staff will require that they test several more of their most widely used products.

2. Upon written request from the AQD District Supervisor, the permittee shall verify the VOC destruction efficiency of the RTO for EUM-1000A2 and EUM-1000A or ECOCOOL/T105-1460 for EUM-2000, by testing at owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in 40 CFR Part 60, Appendix A. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol. No less than 60 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. (R 336.1702(a), R 336.1910, R 336.2001, R 336.2003, R 336.2004)

AQD Comment: Appears to be in Compliance. The AQD had not requested any additional testing of the RTO for EUM-1000A2 and EUM-2000 was tested in September of 2016.

3. Within 180 days from commencement of trial operation of EUM-20002, the permittee shall verify the VOC destruction efficiency of the ECOCOOOL/T121-1020, by testing at owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in 40 CFR Part 60, Appendix A. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol. No less than 60 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. (R 336.1702(a), R 336.1910, R 336.2001, R 336.2003, R 336.2004)

AQD Comment: Appears to be in NON-COMPLIANCE. The facility hasn't tested this unit yet as required.

## VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 15<sup>th</sup> day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. (R 336.1205, R 336.1225, R 336.1702(a))

AQD Comment: Appears to be in COMPLIANCE.

2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each VOC containing material, including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1225, R 336.1702)

AQD Comment: Appears to be in COMPLIANCE. The facility maintains SDS sheets of all materials used.

3. The permittee shall keep the following information on a monthly basis for FGWebFed:

- a) The type of each VOC containing material used and reclaimed (heatset inks, UV inks, coatings, fountain solutions, cleaning solutions, etc.).
- b) The amount (in pounds or gallons) of each VOC containing material used and reclaimed.
- c) All applicable records to show compliance with SC II.1
- d) The VOC content of each material as received and as applied (in percent by weight or pounds per gallon).
- e) VOC mass emission calculations determining the monthly emission rate in tons per calendar month. (Retention factors from Control Techniques Guidelines for Offset Lithographic Printing and Letterpress Printing, EPA-453/R-06-002, September 2006 may be used, or an alternate factor approved by the AQD District Supervisor).
- f) VOC emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month. (Retention factors from Control Techniques Guidelines for Offset Lithographic

Printing and Letterpress Printing, EPA-453/R-06-002, September 2006 may be used, or an alternate factor approved by the AQD District Supervisor).

The permittee shall keep the records using mass balance, or a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1702(a))

**AQD Comment:** Appears to be in COMPLIANCE.

4. The permittee shall keep the following information on a calendar month basis for FGWebFed:

- a) Gallons (with water) of each kerosine, hydro-desulfurized (CAS No. 64742-81-0) containing material used.
- b) Where applicable, gallons (with water) of each kerosine, hydro-desulfurized (CAS No. 64742-81-0) containing material reclaimed.
- c) Each kerosine, hydro-desulfurized (CAS No. 64742-81-0) content (with water) in pounds per gallon of each material used.
- d) Kerosine, hydro-desulfurized (CAS No. 64742-81-0) mass emission calculations determining the monthly emission rate in tons per calendar month.
- e) Kerosine, hydro-desulfurized (CAS No. 64742-81-0) mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records using mass balance, or an alternative method and format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.<sup>1</sup> (R 336.1225(1))

**AQD Comment:** Appears to be in COMPLIANCE.

5. The permittee shall record, in a satisfactory manner, the temperature in the combustion zone of the RTO on a continuous basis, during operation of EUM-1000A2 and EUM-1000A. Temperature data recording shall consist of measurements made at equally spaced intervals, not to exceed 15 minutes per interval. All records shall be kept on file and made available to the Department upon request. (R 336.1205, R 336.1225, R 336.1702)

**AQD Comment:** Appears to be in COMPLIANCE. The combustion temperatures are electronically monitored and recorded. Each month they get downloaded to a computer.

6. The permittee shall record, in a satisfactory manner, the temperature in the combustion zone of each ECOCOL System on a continuous basis, during operation of EUM-2000 and/or EUM-20002. Temperature data recording shall consist of measurements made at equally spaced intervals, not to exceed 15 minutes per interval. All records shall be kept on file and made available to the Department upon request. (R 336.1205, R 336.1225, R 336.1702)

**AQD Comment:** Appears to be in COMPLIANCE. The combustion temperatures are electronically monitored and recorded. Each month they get downloaded to a computer.

## **VII. REPORTING**

1. Within 30 days after completion of the installation, construction, reconstruction, relocation or modification of EUM20002 authorized by this Permit to Install, the permittee or the authorized

agent pursuant to Rule 204, shall notify the AQD District Supervisor, in writing, of the completion of the activity. Completion of the installation, construction, reconstruction, relocation or modification is considered to occur not later than the commencement of trial operation of EUM20002. (R 336.1201(7)(a))

**AQD Comment: Appears to be in NON-COMPLIANCE. The facility never notified the AQD, in writing, of the completion of installation of the press.**

#### **VIII. STACK/VENT RESTRICTION(S)**

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

<b>Stack &amp; Vent ID</b>	<b>Maximum Exhaust Diameter / Dimensions (inches)</b>	<b>Minimum Height Above Ground (feet)</b>	<b>Underlying Applicable Requirements</b>
<b>1. SV-RTO (EUM-1000A2 &amp; EUM-1000A)</b>	<b>24</b>	<b>32</b>	<b>R 336.1225, 40 CFR 52.21(c) &amp; (d)</b>
<b>2. SV-ECOCOOL-01 (EUM-2000)</b>	<b>22</b>	<b>34</b>	<b>R 336.1225, 40 CFR 52.21(c) &amp; (d)</b>
<b>3. SV-ECOCOOL-02 (EUM-20002)</b>	<b>22</b>	<b>34</b>	<b>R 336.1225, 40 CFR 52.21(c) &amp; (d)</b>

**AQD Comment: Appears to be in COMPLIANCE. The stack dimensions appear to be correct.**

#### **IX. OTHER REQUIREMENT(S)**

NA

Footnotes:

<sup>1</sup> This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

<p><b>FGSheetFed</b></p> <p><b>FLEXIBLE GROUP CONDITIONS</b></p>
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#### **DESCRIPTION**

Two (2) Sheetfed Offset Lithographic Printing Presses and One (1) Coater.

Emission Unit: EUSheetFed-02, EUSheetFed-05, EUSheetFed-08

**POLLUTION CONTROL EQUIPMENT**

NA

**I. EMISSION LIMIT(S)**

AQD	Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
	1. VOCs	24.6 tpy	12-month rolling time period as determined at the end of each calendar month	FGSheetFed	SC VI.1, SC VI.2, SC VI.3	R 336.1702(a)
	2. Petroleum Naphtha  (CAS No. 64742-47-8)	7.5 tpy	12-month rolling time period as determined at the end of each calendar month	FGSheetFed	SC VI.1, SC VI.2, SC VI.4	R 336.1225(1)

Comment: Appears to be in COMPLIANCE. Records reviewed by staff ending June of 2022 indicate emissions of VOC at approximately 0.65 tons and Petroleum Naphtha at 0.18 tons.

**II. MATERIAL LIMIT(S)**

Material	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOC Content of the Fountain Solution	5.0% By Weight As Applied	Instantaneous	FGSheetFed	SC VI.1, SC VI.2, SC VI.5	R 336.1702 (a)

AQD Comment: Appears to be in COMPLIANCE. Staff did not take any samples but the facility mixes their fountain solutions at 4 to 6 ounces per gallon of R.O. Water. Records reviewed indicate one fountain solution at 2.5% as applied and the other at 1.1%.

**III. PROCESS/OPERATIONAL RESTRICTION(S)**

1. All VOC-containing inks, fountain solution, coatings, cleaning solvents such as blanket and roller washes, used shop towels, etc. (materials) shall be stored in closed containers and

disposed of in an acceptable manner, in compliance with all applicable state rules and federal regulations. (R 336.1224, R 336.1225, R 336.1702(a))

**AQD Comment: Appears to be in COMPLIANCE. Staff did not note any materials uncovered during the inspection. Everything appeared to be stored in covered totes, drums, or buckets. Staff was told that USIT out of Livonia still hauls their waste to Stericycle in Indiana. Jeff said that they still get records from Stericycle showing that the waste was destroyed.**

**2. The permittee shall handle all VOC and/or HAP containing materials, in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary. (R 336.1224, R 336.1225, R 336.1702(a))**

**AQD Comment: Appears to be in COMPLIANCE. Staff did not note any materials uncovered during the inspection. Everything appeared to be stored in covered totes, drums, or buckets.**

**3. All printing press-related cleaning solvents shall have VOC composite partial vapor pressures that do not exceed 10 mmHg @ 20°C (68°F). (R 336.1702(a))**

**AQD Comment: Appears to be in COMPLIANCE. The roller and blanket washes used appear to meet this requirement.**

#### **IV. DESIGN/EQUIPMENT PARAMETER(S)**

NA

#### **V. TESTING/SAMPLING**

**Records shall be maintained on file for a period of five years. (R 336.1201(3))**

1. The permittee shall verify the VOC content of any ink, coating, fountain solution, *etc.* (material), as received and as applied, using federal Reference Test Method 24 or 24A pursuant to Rule 1040(5). Upon prior written approval by the AQD District Supervisor, VOC content may be determined from manufacturer's formulation data. If the Method 24 or 24A and the formulation values should differ, the Method 24 or 24A results shall be used to determine compliance. (R 336.1702(a), R 336.2001, R 336.2003, R 336.2004, R 336.2040 (5))

**AQD Comment: Will consider them to be in COMPLIANCE. The facility tested several products following the previous inspection back in 2018 and the lab used stated that they were all within the limits stated in their respective SDS's. Since the facility switched back to their original ink supplier, staff will require that they test several more of their most widely used products.**

#### **VI. MONITORING/RECORDKEEPING**

**Records shall be maintained on file for a period of five years. (R 336.1201(3))**

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 15<sup>th</sup> day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. (R 336.1205, R 336.1225, R 336.1702(a))

**AQD Comment: Appears to be in COMPLIANCE.**

2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each VOC containing material, including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1225, R 336.1702)

**AQD Comment:** Appears to be in Compliance. The facility maintains SDS sheets of all materials used.

3. The permittee shall keep the following information on a monthly basis for FGSheetFed:

- a) The type of each VOC containing material used and reclaimed (non-heatset sheetfed inks, UV inks, coatings, fountain solutions, cleaning solutions, etc.).
- b) The amount (in pounds or gallons) of each VOC containing material used and reclaimed.
- c) The VOC content of each material as received and as applied (in percent by weight or pounds per gallon).
- d) VOC mass emission calculations determining the monthly emission rate in tons per calendar month. (Retention factors from Control Techniques Guidelines for Offset Lithographic Printing and Letterpress Printing, EPA-453/R-06-002, September 2006 may be used, or an alternate factor approved by the AQD District Supervisor)
- e) VOC emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month. (Retention factors from Control Techniques Guidelines for Offset Lithographic Printing and Letterpress Printing, EPA-453/R-06-002, September 2006 may be used, or an alternate factor approved by the AQD District Supervisor)

The permittee shall keep the records using mass balance, or a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1702(a))

**AQD Comment:** Appears to be in COMPLIANCE. Staff noted that the above items were being kept on their recordkeeping spreadsheets and/or SDS.

4. The permittee shall keep the following information on a monthly basis for FGSheetFed:

- a) The type of each Petroleum Naphtha (CAS No. 64742-47-8) containing material used and reclaimed (non-heatset sheetfed inks, UV inks, coatings, fountain solutions, cleaning solutions, etc.).
- b) The amount (in pounds or gallons) of each Petroleum Naphtha (CAS No. 64742-47-8) containing material used and reclaimed.
- c) The Petroleum Naphtha (CAS No. 64742-47-8) content of each material as received and as-applied (in percent by weight or pounds per gallon).
- d) Petroleum Naphtha (CAS No. 64742-47-8) mass emission calculations determining the monthly emission rate in tons per calendar month. (Retention factors from Control Techniques Guidelines for Offset Lithographic Printing and Letterpress Printing, EPA-453/R-06-002, September 2006 may be used or an alternate factor approved by the AQD District Supervisor)

e) Petroleum Naphtha (CAS No. 64742-47-8) emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month. (Retention factors from Control Techniques Guidelines for Offset Lithographic Printing and Letterpress Printing, EPA-453/R-06-002, September 2006 may be used, or an alternate factor approved by the AQD District Supervisor)

The permittee shall keep the records using mass balance, or a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.<sup>1</sup> (R 336.1225(1))

**AQD Comment:** Appears to be in COMPLIANCE. Staff noted that the above items were being kept on their recordkeeping spreadsheets.

5. The permittee shall calculate the VOC content of the fountain solution using the method detailed in Appendix A or an alternate method approved by the AQD District Supervisor. Calculations shall include both dampening aid and wetting agent, as used, in percent by weight. The permittee shall keep all records on file at the facility and make them available to the Department upon request. (R 336.1702(a))

**AQD Comment:** Appears to be in COMPLIANCE. Although the facility doesn't appear to use Appendix A for their calculations, they have a pre-set mixing ratio of the solutions with water that you can calculate their percentage from.

#### **VII. REPORTING**

NA

#### **VIII. STACK/VENT RESTRICTION(S)**

NA

#### **IX. OTHER REQUIREMENT(S)**

NA

Footnotes:

<sup>1</sup> This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

<p><b>FGInkJet</b></p> <p><b>FLEXIBLE GROUP CONDITIONS</b></p>
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#### **DESCRIPTION**

Five (5) Ink Jet Printers

Emission Unit: EUInkJet-01, EUInkJet-02, EUInkJet-03, EUInkJet-04, EUInkJet-05

#### **POLLUTION CONTROL EQUIPMENT**

NA

#### **I. EMISSION LIMIT(S)**



Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. VOCs	0.7 tpy	12-month rolling time period as determined at the end of each calendar month	FGInkJet	SC VI.1, SC VI.2, SC VI.3	R 336.1702(a)
2. Solvent Black 27	43.8 lb/yr	12-month rolling time period as determined at the end of each calendar month	FGInkJet	SC VI.4	R 336.1225
3. Acetone	1.5 tpy	12-month rolling time period as determined at the end of each calendar month	FGInkJet	SC VI.5	R 336.1224, R 336.1225

**AQD Comment:** Appears to be in COMPLIANCE. Records reviewed by staff ending June of 2022 showed emissions of VOC at approximately 0.052 tons, Solvent black at 35.44 pounds, and Acetone at 0.473 tons.

## II. MATERIAL LIMIT(S)

NA

## III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall handle all VOC and/or HAP containing materials, in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary. (R 336.1224, R 336.1225, R 336.1702(a))

**AQD Comment:** Appears to be in COMPLIANCE. Staff did not note any materials uncovered during the inspection. Everything appeared to be stored in covered totes, drums, or buckets.

## IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

## V. TESTING/SAMPLING

**Records shall be maintained on file for a period of five years. (R 336.1201(3))**

1. The permittee shall verify the VOC content of any ink, coating, fountain solution, etc. (material), as received and as applied, using federal Reference Test Method 24 or 24A pursuant to Rule 1040(5). Upon prior written approval by the AQD District Supervisor, VOC content may be determined from manufacturer's formulation data. If the Method 24 or 24A and the formulation values should differ, the Method 24 or 24A results shall be used to determine compliance. (R 336.1702(a), R 336.2001, R 336.2003, R 336.2004, R 336.2040 (5))

**AQD Comment: Will consider them to be in COMPLIANCE. The facility tested several products following the previous inspection back in 2018 and the lab used stated that they were all within the limits stated in their respective SDS's. Since the facility switched back to their original ink supplier, staff will require that they test several more of their most widely used products.**

## **VI. MONITORING/RECORDKEEPING**

**Records shall be maintained on file for a period of five years. (R 336.1201(3))**

**1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 15<sup>th</sup> day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. (R 336.1205, R 336.1225, R 336.1702(a))**

**AQD Comment: Appears to be in COMPLIANCE.**

**2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each VOC containing material, including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1225, R 336.1702)**

**AQD Comment: Appears to be in Compliance. The facility maintains SDS sheets of all materials used.**

- 3. The permittee shall keep the following information on a monthly basis for FGInkJet:**
- a) The type of each VOC containing material used and reclaimed (inks, coatings, blanket wash, etc.).**
  - b) The amount (in pounds or gallons) of each VOC containing material used and reclaimed.**
  - c) The VOC content of each material as received and as applied (in percent by weight or pounds per gallon).**
  - d) VOC mass emission calculations determining the monthly emission rate in tons per calendar month.**
  - e) VOC emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.**

**The permittee shall keep the records using mass balance, or a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1702(a))**

**AQD Comment: Appears to be in Compliance. The facility maintains records of the above.**

- 4. The permittee shall keep the following information on a monthly basis for FGInkJet:**
- a) The type of each Solvent Black 27 containing material used.**
  - b) The amount (in pounds or gallons) of each Solvent Black 27 containing material used.**

c) Solvent Black 27 mass emission calculations determining the monthly emission rate in pounds per calendar month.

d) Solvent Black 27 emission calculations determining the annual emission rate in pounds per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records using mass balance, or a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1225)

AQD Comment: Appears to be in Compliance. The facility maintains records of the above.

5. The permittee shall keep the following information on a monthly basis for FGInkJet:

a) The type of each acetone containing material used.

b) The amount (in pounds or gallons) of each acetone containing material used.

c) Acetone mass emission calculations determining the monthly emission rate in pounds per calendar month.

d) Acetone emission calculations determining the annual emission rate in pounds per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records using mass balance, or a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1224, R 336.1225)

AQD Comment: Appears to be in Compliance. The facility maintains records of the above.

#### VII. REPORTING

NA

#### VIII. STACK/VENT RESTRICTION(S)

NA

#### IX. OTHER REQUIREMENT(S)

NA

#### Footnotes:

<sup>1</sup> This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

### FGFACILITY CONDITIONS

#### DESCRIPTION

The following conditions apply source-wide to all process equipment including equipment covered by other permits, grand-fathered equipment and exempt equipment.

#### POLLUTION CONTROL EQUIPMENT

NA

**I. EMISSION LIMIT(S)**

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. Each Individual HAP	Less than 9.0 tpy	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC VI.1, SC VI.2	R 336.1205 (3)
2. Aggregate HAPs	Less than 22.5 tpy	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC VI.1, SC VI.2	R 336.1205 (3)
3. Naphthalene (CAS No. 91-20-3)	166.5 lb/yr	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC VI.1, SC VI.3	R 336.1225 (2)

**AQD Comment:** Appears to be in Compliance with the above limits. Records reviewed by staff ending June 2022 indicate single HAP at 0.014 tons (Manganese Compound with CAS #13434-24-7), Aggregate HAPs at 0.015 tons, and Napthalene at 3.54 pounds.

**II. MATERIAL LIMIT(S)**

NA

**III. PROCESS/OPERATIONAL RESTRICTION(S)**

NA

**IV. DESIGN/EQUIPMENT PARAMETER(S)**

NA

**V. TESTING/SAMPLING**

Records shall be maintained on file for a period of five years. (R 336.1201(3))

1. The permittee shall determine the HAP content of any material as applied and as received, using manufacturer's formulation data. Upon request of the AQD District Supervisor, the permittee shall verify the manufacturer's HAP formulation data using EPA Test Method 311. (R 336.1205(3))

**AQD Comment: Appears to be in Compliance. The facility uses SDS data and the AQD has not requested that they do any additional testing.**

## **VI. MONITORING/RECORDKEEPING**

**Records shall be maintained on file for a period of five years. (R 336.1201(3))**

**1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 15<sup>th</sup> day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. (R 336.1205(3))**

**AQD Comment: Appears to be in COMPLIANCE.**

**2. The permittee shall keep the following information on a monthly basis for FGFACILITY:**

- a) Gallons or pounds of each HAP containing material used.**
- b) Where applicable, gallons or pounds of each HAP containing material reclaimed.**
- c) HAP content, in pounds per gallon or pounds per pound, of each HAP containing material used.**
- d) Individual and aggregate HAP emission calculations determining the monthly emission rate of each in tons per calendar month.**
- e) Individual and aggregate HAP emission calculations determining the annual emission rate of each in tons per 12-month rolling time period as determined at the end of each calendar month.**

**The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1205(3))**

**AQD Comment: Appears to be in COMPLIANCE with the above.**

**3. The permittee shall keep the following information on a monthly basis for FGFACILITY:**

- a) The type of each Naphthalene (CAS No. 91-20-3) containing material used and reclaimed.**
- b) The amount (in pounds or gallons) of each Naphthalene (CAS No. 91-20-3) containing material used and reclaimed.**
- c) The Naphthalene (CAS No. 91-20-3) content of each material as received and as applied (in percent by weight or pounds per gallon).**
- d) Naphthalene (CAS No. 91-20-3) mass emission calculations determining the monthly emission rate in tons per calendar month. (Retention factors from Control Techniques Guidelines for Offset Lithographic Printing and Letterpress Printing, EPA-453/R-06-002, September 2006 may be used, or an alternate factor approved by the AQD District Supervisor)**
- e) Naphthalene (CAS No. 91-20-3) emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month. (Retention factors from Control Techniques Guidelines for**

Offset Lithographic Printing and Letterpress Printing, EPA-453/R-06-002, September 2006 may be used, or an alternate factor approved by the AQD District Supervisor)

The permittee shall keep the records using mass balance, or a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.<sup>1</sup> (R 336.1225(2))

AQD Comment: Appears to be in COMPLIANCE with the above.

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

<sup>1</sup> This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

APPENDIX A

Weight Percent of VOCs\* in Fountain Solution

For Offset Lithographic Printing

Month/Year:

		A	B	C	D	E <sup>1</sup>
Date	Material ID	Material Used as received (gallons)	Material Density (lbs/gal)	VOC Content as received (wt %)	Water Used (gallons)	VOC Content as used (wt %)

		A	B	C	D	E <sup>1</sup>
Date	Material ID	Material Used as received (gallons)	Material Density (lbs/gal)	VOC Content as received (wt %)	Water Used (gallons)	VOC Content as used (wt %)

Include both dampening aid and wetting agent, as used, in percent by weight.

VOC Weight Percent Limit = 5%

<sup>1</sup> To Calculate the VOC weight percent use the following equation:

$$E = \frac{\left( A \times B \times \frac{C}{100} \right) \times 100}{(A \times B) + (D \times 8.34)} = \frac{(A \times B \times C)}{(A \times B) + (D \times 8.34)}$$

**For C, if 9% use 9 not 0.09**

**E shall be less than or equal to 5%**

**INSPECTION COMPLIANCE SUMMARY: The facility appears to be in NON-COMPLIANCE for the following issues which staff will be sending a Violation Notice for:**

1. The facility didn't test the printing press designated as EUM-20002 within 180 days of installation.
2. The facility didn't notify the AQD, in writing, within 30-Days of completing the installation of the printing press designated as EUM-20002.

NAME Matt Deskins

DATE 6-28-22

SUPERVISOR  6-28-22