# MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

March 10, 2016

PERMIT TO INSTALL 424-97F

**ISSUED TO**Multi Packaging Solutions, Inc.

LOCATED AT 5800 Grand River Avenue Lansing, Michigan

IN THE COUNTY OF Clinton

# STATE REGISTRATION NUMBER N3531

The Air Quality Division has approved this Permit to Install, pursuant to the delegation of authority from the Michigan Department of Environmental Quality. This permit is hereby issued in accordance with and subject to Section 5505(1) of Article II, Chapter I, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. Pursuant to Air Pollution Control Rule 336.1201(1), this permit constitutes the permittee's authority to install the identified emission unit(s) in accordance with all administrative rules of the Department and the attached conditions. Operation of the emission unit(s) identified in this Permit to Install is allowed pursuant to Rule 336.1201(6).

DATE OF RECEIPT OF ALL INFORMATION  January 15, 2016	REQUIRED BY RULE 203:
DATE PERMIT TO INSTALL APPROVED:  March 10, 2016	SIGNATURE:
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

# PERMIT TO INSTALL

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# **Common Abbreviations / Acronyms**

	Common Acronyms	P	ollutant / Measurement Abbreviations
AQD	Air Quality Division	acfm	Actual cubic feet per minute
BACT	Best Available Control Technology	BTU	British Thermal Unit
CAA	Clean Air Act	°C	Degrees Celsius
CAM	Compliance Assurance Monitoring	СО	Carbon Monoxide
CEM	Continuous Emission Monitoring	CO <sub>2</sub> e	Carbon Dioxide Equivalent
CFR	Code of Federal Regulations	dscf	Dry standard cubic foot
СОМ	Continuous Opacity Monitoring	dscm	Dry standard cubic meter
Department/	Michigan Department of Environmental	°F	Degrees Fahrenheit
department	Quality	gr	Grains
EU	Emission Unit	HAP	Hazardous Air Pollutant
FG	Flexible Group	Hg	Mercury
GACS	Gallons of Applied Coating Solids	hr	Hour
GC	General Condition	HP	Horsepower
GHGs	Greenhouse Gases	H <sub>2</sub> S	Hydrogen Sulfide
HVLP	High Volume Low Pressure*	kW	Kilowatt
ID	Identification	lb	Pound
IRSL	Initial Risk Screening Level	m	Meter
ITSL	Initial Threshold Screening Level	mg	Milligram
LAER	Lowest Achievable Emission Rate	mm	Millimeter
MACT	Maximum Achievable Control Technology	MM	Million
MAERS	Michigan Air Emissions Reporting System	MW	Megawatts
MAP	Malfunction Abatement Plan	NMOC	Non-methane Organic Compounds
MDEQ	Michigan Department of Environmental	NO <sub>x</sub>	Oxides of Nitrogen
	Quality	ng	Nanogram
MSDS	Material Safety Data Sheet	PM	Particulate Matter
NA	Not Applicable	PM10	Particulate Matter equal to or less than 10
NAAQS	National Ambient Air Quality Standards National Emission Standard for Hazardous		microns in diameter
NESHAP	Air Pollutants	PM2.5	Particulate Matter equal to or less than 2.5 microns in diameter
NSPS	New Source Performance Standards	pph	Pounds per hour
NSR	New Source Review	ppm	Parts per million
PS	Performance Specification	ppmv	Parts per million by volume
PSD	Prevention of Significant Deterioration	ppmw	Parts per million by weight
PTE	Permanent Total Enclosure	psia	Pounds per square inch absolute
PTI	Permit to Install	psig	Pounds per square inch gauge
RACT	Reasonable Available Control Technology	scf	Standard cubic feet
ROP	Renewable Operating Permit	sec	Seconds
SC	Special Condition	SO <sub>2</sub>	Sulfur Dioxide
SCR	Selective Catalytic Reduction	TAC	Toxic Air Contaminant
SNCR	Selective Non-Catalytic Reduction	Temp	Temperature
SRN	State Registration Number	THC	Total Hydrocarbons
TEQ	Toxicity Equivalence Quotient	tpy	Tons per year
USEPA/EPA	United States Environmental Protection	μg	Microgram
\/_	Agency	μm	Micrometer or Micron
VE	Visible Emissions	VOC	Volatile Organic Compounds
	licators, the prossure measured at the gun air co	yr 	Year

<sup>\*</sup>For HVLP applicators, the pressure measured at the gun air cap shall not exceed 10 psig.

#### **GENERAL CONDITIONS**

- 1. The process or process equipment covered by this permit shall not be reconstructed, relocated, or modified, unless a Permit to Install authorizing such action is issued by the Department, except to the extent such action is exempt from the Permit to Install requirements by any applicable rule. (R 336.1201(1))
- 2. If the installation, construction, reconstruction, relocation, or modification of the equipment for which this permit has been approved has not commenced within 18 months, or has been interrupted for 18 months, this permit shall become void unless otherwise authorized by the Department. Furthermore, the permittee or the designated authorized agent shall notify the Department via the Supervisor, Permit Section, Air Quality Division, Michigan Department of Environmental Quality, P.O. Box 30260, Lansing, Michigan 48909-7760, if it is decided not to pursue the installation, construction, reconstruction, relocation, or modification of the equipment allowed by this Permit to Install. (R 336.1201(4))
- 3. If this Permit to Install is issued for a process or process equipment located at a stationary source that is not subject to the Renewable Operating Permit program requirements pursuant to R 336.1210, operation of the process or process equipment is allowed by this permit if the equipment performs in accordance with the terms and conditions of this Permit to Install. (R 336.1201(6)(b))
- 4. The Department may, after notice and opportunity for a hearing, revoke this Permit to Install if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of this permit or is violating the Department's rules or the Clean Air Act. (R 336.1201(8), Section 5510 of Act 451, PA 1994)
- 5. The terms and conditions of this Permit to Install shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by this Permit to Install. If the new owner or operator submits a written request to the Department pursuant to R 336.1219 and the Department approves the request, this permit will be amended to reflect the change of ownership or operational control. The request must include all of the information required by subrules (1)(a), (b), and (c) of R 336.1219 and shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Environmental Quality. (R 336.1219)
- 6. Operation of this equipment shall not result in the emission of an air contaminant which causes injurious effects to human health or safety, animal life, plant life of significant economic value, or property, or which causes unreasonable interference with the comfortable enjoyment of life and property. (R 336.1901)
- 7. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the Department. The notice shall be provided not later than two business days after start-up, shutdown, or discovery of the abnormal condition or malfunction. Written reports, if required, must be filed with the Department within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal conditions or malfunction has been corrected, or within 30 days of discovery of the abnormal condition or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5). (R 336.1912)
- 8. Approval of this permit does not exempt the permittee from complying with any future applicable requirements which may be promulgated under Part 55 of 1994 PA 451, as amended or the Federal Clean Air Act.
- Approval of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.
- 10. Operation of this equipment may be subject to other requirements of Part 55 of 1994 PA 451, as amended and the rules promulgated thereunder.

- 11. Except as provided in subrules (2) and (3) or unless the special conditions of the Permit to Install include an alternate opacity limit established pursuant to subrule (4) of R 336.1301, the permittee shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of density greater than the most stringent of the following. The grading of visible emissions shall be determined in accordance with R 336.1303. (R 336.1301)
  - a) A six-minute average of 20 percent opacity, except for one six-minute average per hour of not more than 27 percent opacity.
  - b) A visible emission limit specified by an applicable federal new source performance standard.
  - c) A visible emission limit specified as a condition of this Permit to Install.
- 12. Collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority I and II areas requires the use of material handling methods specified in R 336.1370(2). (R 336.1370)
- 13. The Department may require the permittee to conduct acceptable performance tests, at the permittee's expense, in accordance with R 336.2001 and R 336.2003, under any of the conditions listed in R 336.2001. (R 336.2001)

# **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 (Process Equipment & Control Devices)	Type of Printing	Operation	Flexible Group ID
EU-PressRoom-01	38" 2-Color Heidelberg Press (2C-1)	Sheetfed Litho	Printing Light- Weight Papers	FG-PressRoom
EU-PressRoom-03	38" 6-color Heidelberg Straight (6C-2)	Sheetfed Litho	Printing paper 1-side	FG-PressRoom
EU-FMD-Multi-03	10" 1-color 1250 Snap Press (#1)	Rotary Letterpress	Snapout Forms	FG-FMD-Multi
EU-FMD-Multi-09	10" 2-color 1250 Envelope Press #6	Sheetfed Litho	Envelope Printing	FG-FMD-Multi
EU-FMD-Multi-15	10" 1-color 1250 Multilith Card Press	Sheetfed Litho	Sheet (flat) Printing	FG-FMD-Multi
EU-FMD-Multi-23	12"x18" 1-color Kluge	Letterpress	Continuous Forms	FG-FMD-Multi
EU-FMD-Multi-24	12"x18" 2-color Heidelberg Printmaster	Sheetfed Litho	Sheet (flat) Printing	FG-FMD-Multi
EU-FMD-Multi-30	12" x 18" 2-color Heidelberg (Flat #2)	Sheetfed Litho	Sheet (flat) Printing	FG-FMD-Multi
EU-SLI-01	10" 6-color SLI Letterpress (SLI #1)	Rotary Letterpress	Printing Plastic Tags	FG-SLI
EU-SLI-02	10" 7-color SLI Letterpress (SLI #2)	Rotary Letterpress	Printing Plastic Tags	FG-SLI
EU-SLI-03	10" 7-color SLI Letterpress (SLI #3)	Rotary Letterpress	Printing Plastic Tags	FG-SLI
EU-SLI-04	10" 7-color SLI Letterpress (SLI #4)	Rotary Letterpress	Printing Film and Labels	FG-SLI
EU-SLI-05	14" 8-color SLI Letterpress (SLI #5)	Rotary Letterpress	Printing Film, Labels, Plastic	FG-SLI
EU-Packaging-02	6 1/2" 1-color Webtron Press (1C-1)	Flexographic	Plastic Tag Printing	FG-Packaging
EU-Packaging-11	16" 8-color Comco Press (C-3)	Flexographic	Carton printing	FG-Packaging
EU-Packaging-13	16" 8-color Comco Press (C-5)	Flexographic	Carton printing	FG-Packaging
EU-Packaging-25	16" P-7 8-color Mark Andy (C-7)	Flexographic	Carton Printing	FG-Packaging
EU-Packaging-29	13" 8-color Comco Press (C-8)	Flexographic	Carton Printing	FG-Packaging
EU-Packaging-30	35" Folder-Gluer (F/G #1)	Bobst Domino 90	Folding & Gluing Cartons	FG-Packaging
EU-Packaging-14	40" Folder-Gluer (F/G #1)	International	Folding & Gluing Cartons	FG-Packaging
EU-Packaging-15	50mm Folder-Gluer (F/G #2)	Signature	Folding & Gluing Cartons	FG-Packaging

Emission Unit ID	Emission Unit Description (Process Equipment & Control Devices)	Type of Printing	Operation	Flexible Group ID
EU-Packaging-16	70mm Folder-Gluer (F/G #3)	Signature	Folding & Gluing Cartons	FG-Packaging
EU-Packaging-19	8-color Mark Andy Web Press (MA3)	Flexographic	Label Printing	FG-Packaging
EU-Packaging-20	16" 8-color Comco Web Press (C-6)	Flexographic	Carton Printing	FG-Packaging
EU-Packaging-21	P-5 Label Press (MA4)	Flexographic	Label Printing	FG-Packaging
EU-Packaging-22	13" Mark Andy 2200 Press (MA1)	Flexographic	Label Printing	FG-Packaging
EU-Packaging-26	13" 8-color Mark Andy P-5 Press (MA5)	Flexographic	Label Printing	FG-Packaging
EU-Packaging-27	13" 10-color Mark Andy P-5 Press (MA6)	Flexographic	Label Printing	FG-Packaging
EU-Packaging-24	Imaje 9040 Back-numbering Unit	Flexographic	Label Back Numbering	FG-Packaging
EU-Packaging-28	Imaje 9030 Back-numbering Unit	Flexographic	Label Back Numbering	FG-Packaging
EU-Packaging-31	13" 10-color Mark Andy P-5 Press (MA7)	Flexographic	Label Printing	FG-Packaging
EU-PrePress-01	100 Gallon Flex Plate Solvent Still / Flex-Light 3547 Plate Processor	Flexo Plate Solvent	Flexo Plate Processing and Solvent Recovery	N/A
EU-Envelope-02	4 1/2"x9 1/2" MGS Envelope Folder	W&D Machinery	Folding and Gluing Envelopes	FG-Envelope
EU-Envelope-03	4 1/2"x9 1/2" 127M Envelope Folder	W&D Machinery	Folding and Gluing Envelopes	FG-Envelope
EU-Digital-01	Omega #1	QC330	Label Die Cutting & Coating	FG-Digital
EU-Digital-02	Omega #2	SR1300	Label Die Cutting & Coating	FG-Digital
EU-Digital-10	Omega #3	Coating	Label Die Cutting & Coating	FG-Digital
EU-Digital-07	Indigo 6000	Digital Print Engine	Digital printing - labels	FG-Digital
EU-Digital-08	Indigo 6600	Digital Print Engine	Digital printing - labels	FG-Digital
EU-Digital-09	HP 30,000	Digital Print Engine	Digital printing - labels	FG-Digital
EU-Forms-01	26" 6-Color Drent Press	Lithographic	Business forms printing	FG-Forms
EU-Forms-03	15 ½" 4-Color Didde Press (SV-15)	Lithographic	Business forms printing	FG-Forms

Emission Unit ID	Emission Unit Description (Process Equipment & Control Devices)	Type of Printing	Operation	Flexible Group ID
EU-Forms-05	Magnum Collator	Collating and gluing	Collating and gluing printed business forms	FG-Forms
EU-Forms-06	Bunch Collator	Collating and gluing	Collating and gluing printed business forms	FG-Forms
EU-Forms-07	Web-Klect Collator	Collating and gluing	Collating and gluing printed business forms	FG-Forms

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 336.1290.

# The following conditions apply to: EU-PrePress-01

DESCRIPTION: 100 Gallon Flex Plate Solvent Still / Flex-Light 3547 Plate Processor

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT: NA

## I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOC	5.3 tpy	12-month rolling time period as determined at the end of each calendar month.	EU-PrePress-01	SC VI.3	R 336.1225, R 336.1702(a)

#### II. MATERIAL LIMITS

NA

## III. PROCESS/OPERATIONAL RESTRICTIONS

1. All waste inks, coatings, fountain solutions, blanket wash/press wash or cleaning solvents, adhesives, ink-jet inks, makeup solvents, purge and clean-up solvents, etc. (materials) shall be captured and stored in closed containers and shall be 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))

## IV. DESIGN/EQUIPMENT PARAMETERS

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, 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))

# VI. MONITORING/RECORDKEEPING

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

- The permittee shall maintain a current listing from the manufacturer of the chemical composition of each 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. All records shall be kept on file for a period of at least five years and made available to the Department upon request. (R 336.1225, R 336.1702)
- 3. The permittee shall keep a separate written record of the following for the EU-PrePress-01 on a calendar month averaging period:
  - a) The type of each material used.
  - b) The VOC content of each material, with water, (in percent by weight or pounds per gallon), as applied.
  - c) The usage rate (in pounds or gallons) of each material as applied.
  - d) The amount (in pounds) of each material reclaimed.
  - 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.

# VII. REPORTING

NA

# VIII. STACK/VENT RESTRICTIONS

NA

## IX. OTHER REQUIREMENTS

# **FLEXIBLE GROUP SUMMARY TABLE**

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

Flexible Group ID	Associated Emission Unit IDs
FG-PressRoom	EU-PressRoom-01, EUPressRoom-03. Total of Two (2) Sheetfed Litho Emission
	Units.
FG-FMD-Multi	EU-FMD-Multi-03, EU-FMD-Multi-09, EU-FMD-Multi-015, EU-FMD-Multi-23, EU-
	FMD-Multi-24, EU-FMD-Multi-30. Total of six (6) Sheetfed Litho and Letterpress
	Emission Units.
FG-SLI	EU-SLI-01, EU-SLI-02, EU-SLI-03, EU-SLI-04, and EU-SLI-05. Total of Five (5)
	Rotary Letterpress Emission Units.
FG-Packaging	All Flexographic Operations. EU-Packaging-02, EU-Packaging-11, EU-Packaging-13,
	EU-Packaging-14, EU-Packaging-15, EU-Packaging-16, EU-Packaging-19 (MA3),
	EU-Packaging-20 (C-6), EU-Packaging-25, EU-Packaging-29, EU-Packaging-30,
	EU-Packaging-21 (MA4), EU-Packaging-22 (MA1), EU-Packaging-26,
	EU-Packaging-27, EU-Packaging-24, EU-Packaging-28, and EU-Packaging-31. Total
	of Eighteen (18) Emission Units.
FG-Envelope	EU-Envelope-02, EU-Envelope-03. Total of Two (2) Emission Units.
FG-Digital	EU-Digital-01, EU-Digital-02, EU-Digital-07, EU-Digital-08, EU-Digital-09, and
_	EU-Digital-10. Total of Six (6) Emission Units.
FG-Forms	EU-Forms-01, EU-Forms-03, EU-Forms-05, EU-Forms-06, and EU-Forms-07. Total
	of Five (5) Emission Units.

# The following conditions apply to: FG-PressRoom

**DESCRIPTION:** Total of Two (2) Sheetfed Litho Emission Units.

Emission Units: EU-PressRoom-01, EUPressRoom-03

**POLLUTION CONTROL EQUIPMENT: NA** 

## I. EMISSION LIMITS

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOC	24.7 tpy	12-month rolling time period as determined at the end of each calendar month.	FG-PressRoom	SC VI.3	R 336.1225, R 336.1702(a)

#### II. MATERIAL LIMITS

NA

## III. PROCESS/OPERATIONAL RESTRICTIONS

1. All waste inks, coatings, fountain solutions, blanket wash/press wash or cleaning solvents, adhesives, ink-jet inks, makeup solvents, purge and clean-up solvents, etc. (materials) shall be captured and stored in closed containers and shall be 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))

## IV. DESIGN/EQUIPMENT PARAMETERS

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, 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))

# VI. MONITORING/RECORDKEEPING

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

- The permittee shall maintain a current listing from the manufacturer of the chemical composition of each 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. All records shall be kept on file for a period of at least five years and made available to the Department upon request. (R 336.1225, R 336.1702)
- 3. The permittee shall keep a separate written record of the following for the FG-PressRoom on a calendar month averaging period:
  - a) The type of each material used.
  - b) The VOC content of each material, with water, (in percent by weight or pounds per gallon), as applied.
  - c) The usage rate (in pounds or gallons) of each material as applied.
  - d) The amount (in pounds) of each material reclaimed.
  - 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).

# VII. REPORTING

NA

## VIII. STACK/VENT RESTRICTIONS

NA

# IX. OTHER REQUIREMENTS

# The following conditions apply to: FG-FMD-Multi

**<u>DESCRIPTION</u>**: Total of six (6) Sheetfed Litho and Letterpress Emission Units.

Emission Units: EU-FMD-Multi-03, EU-FMD-Multi-09, EU-FMD-Multi-015, EU-FMD-Multi-23, EU-FMD-Multi-

24, EU-FMD-Multi-30

**POLLUTION CONTROL EQUIPMENT: NA** 

## I. <u>EMISSION LIMITS</u>

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOC	6.9 tpy	12-month rolling time period as determined at the end of each calendar month.	FG-FMD-Multi	SC VI.3	R 336.1225, R 336.1702(a)

## **II. MATERIAL LIMITS**

NA

## III. PROCESS/OPERATIONAL RESTRICTIONS

1. All waste inks, coatings, fountain solutions, blanket wash/press wash or cleaning solvents, adhesives, ink-jet inks, makeup solvents, purge and clean-up solvents, etc. (materials) shall be captured and stored in closed containers and shall be 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))

# IV. DESIGN/EQUIPMENT PARAMETERS

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, 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))

#### VI. MONITORING/RECORDKEEPING

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

- The permittee shall maintain a current listing from the manufacturer of the chemical composition of each 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. All records shall be kept on file for a period of at least five years and made available to the Department upon request. (R 336.1225, R 336.1702)
- 3. The permittee shall keep a separate written record of the following for the FG-FMD-Multi on a calendar month averaging period:
  - a) The type of each material used.
  - b) The VOC content of each material, with water, (in percent by weight or pounds per gallon), as applied.
  - c) The usage rate (in pounds or gallons) of each material as applied.
  - d) The amount (in pounds) of each material reclaimed.
  - 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).

## VII. REPORTING

NA

# VIII. STACK/VENT RESTRICTIONS

NA

## IX. OTHER REQUIREMENTS

## The following conditions apply to: FG-SLI

**<u>DESCRIPTION</u>**: Total of Five (5) Rotary Letter Press Emission Units.

Emission Units: EU-SLI-01, EU-SLI-02, EU-SLI-03, EU-SLI-04, EU-SLI-05

POLLUTION CONTROL EQUIPMENT: NA

## I. EMISSION LIMITS

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOC	2.0 tpy	12-month rolling time period as determined at the end of each calendar month.	FG-SLI	SC VI.3	R 336.1225, R 336.1702(a)

#### II. MATERIAL LIMITS

NA

## **III. PROCESS/OPERATIONAL RESTRICTIONS**

1. All waste inks, coatings, fountain solutions, blanket wash/press wash or cleaning solvents, adhesives, ink-jet inks, makeup solvents, purge and clean-up solvents, etc. (materials) shall be captured and stored in closed containers and shall be 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))

## IV. DESIGN/EQUIPMENT PARAMETERS

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, 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))

## VI. MONITORING/RECORDKEEPING

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

- The permittee shall maintain a current listing from the manufacturer of the chemical composition of each 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. All records shall be kept on file for a period of at least five years and made available to the Department upon request. (R 336.1225, R 336.1702)
- 3. The permittee shall keep a separate written record of the following for the FG-SLI on a calendar month averaging period:
  - a) The type of each material used.
  - b) The VOC content of each material, with water, (in percent by weight or pounds per gallon), as applied.
  - c) The usage rate (in pounds or gallons) of each material as applied.
  - d) The amount (in pounds) of each material reclaimed.
  - 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.

# VII. REPORTING

NA

# VIII. STACK/VENT RESTRICTIONS

NA

## IX. OTHER REQUIREMENTS

# The following conditions apply to: FG-Packaging

**DESCRIPTION:** Total of Eighteen (18) Flexographic Operations.

**Emission Units:** EU-Packaging-02, EU-Packaging-11, EU-Packaging-13, EU-Packaging-14, EU-Packaging-15, EU-Packaging-16, EU-Packaging-19 (MA3), EU-Packaging-20 (C-6), EU-Packaging-25, EU-Packaging-29, EU-Packaging-30, EU-Packaging-21 (MA4), EU-Packaging-22 (MA1), EU-Packaging-26, EU-Packaging-27, EU-Packaging-24, EU-Packaging-28, EU-Packaging-31

## **POLLUTION CONTROL EQUIPMENT: NA**

#### I. EMISSION LIMITS

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOC	11.9 tpy	12-month rolling time period as determined at the end of each calendar month.	FG-Packaging	SC VI.3	R 336.1702(d)
2. VOC	2,000 pounds per month	Calendar Month	FG-Packaging	SC VI.3	R 336.1702(d)

## II. MATERIAL LIMITS

NA

# **III. PROCESS/OPERATIONAL RESTRICTIONS**

1. All waste inks, coatings, fountain solutions, blanket wash/press wash or cleaning solvents, adhesives, ink-jet inks, makeup solvents, purge and clean-up solvents, etc. (materials) shall be captured and stored in closed containers and shall be 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(d))

# IV. DESIGN/EQUIPMENT PARAMETERS

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, 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))

## VI. MONITORING/RECORDKEEPING

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

- 1. All required calculations shall be completed in a format acceptable to the AQD District Supervisor and made available by the 15<sup>th</sup> day of the calendar month, for the previous calendar month, unless otherwise specified in any recordkeeping, reporting or notification special condition. (R 336.1702(d))
- 2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each 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. All records shall be kept on file for a period of at least five years and made available to the Department upon request. (R 336.1225, R 336.1702(d))
- 3. The permittee shall keep a separate written record of the following for the FG-Packaging on a calendar month averaging period:
  - a) The type of each material used.
  - b) The VOC content of each material, with water, (in percent by weight or pounds per gallon), as applied.
  - c) The usage rate (in pounds or gallons) of each material as applied.
  - d) The amount (in pounds) of each material reclaimed.
  - e) VOC emission calculations determining the monthly emission rate in pounds per calendar month.
  - 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.

## VII. REPORTING

NA

#### VIII. STACK/VENT RESTRICTIONS

NA

# IX. OTHER REQUIREMENTS

# The following conditions apply to: FG- Envelope

**DESCRIPTION:** Total of two (2) envelope presses.

Emission Units: EU-Envelope-02, EU-Envelope-03

POLLUTION CONTROL EQUIPMENT: NA

## I. <u>EMISSION LIMITS</u>

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOC	1.0 tpy	12-month rolling time period as determined at the end of each calendar month.	FG-FMD-Envelope	SC VI.3	R 336.1225, R 336.1702(a)

## II. MATERIAL LIMITS

NA

## III. PROCESS/OPERATIONAL RESTRICTIONS

1. All waste inks, coatings, fountain solutions, blanket wash/press wash or cleaning solvents, adhesives, ink-jet inks, makeup solvents, purge and clean-up solvents, etc. (materials) shall be captured and stored in closed containers and shall be 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))

# IV. <u>DESIGN/EQUIPMENT PARAMETERS</u>

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, 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))

# VI. MONITORING/RECORDKEEPING

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

- The permittee shall maintain a current listing from the manufacturer of the chemical composition of each 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. All records shall be kept on file for a period of at least five years and made available to the Department upon request. (R 336.1225, R 336.1702)
- 3. The permittee shall keep a separate written record of the following for the FG-FMD-Envelope on a calendar month averaging period:
  - a) The type of each material used.
  - b) The VOC content of each material, with water (in percent by weight or pounds per gallon), as applied.
  - c) The usage rate (in pounds or gallons) of each material as applied.
  - d) The amount (in pounds) of each material reclaimed.
  - 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.

# VII. REPORTING

NA

# **VIII. STACK/VENT RESTRICTIONS**

NA

## IX. OTHER REQUIREMENTS

# The following conditions apply to: FG-Digital

**DESCRIPTION:** Total of six (6) digital presses.

Emission Units: EU-Digital-01, EU-Digital-02, EU-Digital-07, EU-Digital-08, EU-Digital-09, EU-Digital-10

**POLLUTION CONTROL EQUIPMENT: NA** 

## I. EMISSION LIMITS

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOC	8.1 tpy	12-month rolling time period as determined at the end of each calendar month.	FG-Digital	SC VI.3	R 336.1702(a)

## **II. MATERIAL LIMITS**

NA

## III. PROCESS/OPERATIONAL RESTRICTIONS

1. All waste inks, coatings, fountain solutions, blanket wash/press wash or cleaning solvents, adhesives, ink-jet inks, makeup solvents, purge and clean-up solvents, etc. (materials) shall be captured and stored in closed containers and shall be 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))

## IV. DESIGN/EQUIPMENT PARAMETERS

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, 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))

## VI. MONITORING/RECORDKEEPING

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

- The permittee shall maintain a current listing from the manufacturer of the chemical composition of each 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. All records shall be kept on file for a period of at least five years and made available to the Department upon request. (R 336.1225, R 336.1702)
- 3. The permittee shall keep a separate written record of the following for the FG-Digital on a calendar month averaging period:
  - a) The type of each material used.
  - b) The VOC content of each material, with water (in percent by weight or pounds per gallon), as applied.
  - c) The usage rate (in pounds or gallons) of each material as applied.
  - d) The amount (in pounds) of each material reclaimed.
  - 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.

# VII. REPORTING

NA

## VIII. STACK/VENT RESTRICTIONS

NA

## IX. OTHER REQUIREMENTS

# The following conditions apply to: FG-Forms

**DESCRIPTION:** Total of five (5) forms presses.

Emission Units: EU-Forms-01, EU-Forms-03, EU-Forms-05, EU-Forms-06, EU-Forms-07

**POLLUTION CONTROL EQUIPMENT: NA** 

## I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOC	6.2 tpy	12-month rolling time period as determined at the end of each calendar month.	FG-Forms	SC VI.3	R 336.1225, R 336.1702(a)

## II. MATERIAL LIMITS

NA

# III. PROCESS/OPERATIONAL RESTRICTIONS

1. All waste inks, coatings, fountain solutions, blanket wash/press wash or cleaning solvents, adhesives, ink-jet inks, makeup solvents, purge and clean-up solvents, etc. (materials) shall be captured and stored in closed containers and shall be 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))

## IV. DESIGN/EQUIPMENT PARAMETERS

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, 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))

## VI. MONITORING/RECORDKEEPING

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

- The permittee shall maintain a current listing from the manufacturer of the chemical composition of each 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. All records shall be kept on file for a period of at least five years and made available to the Department upon request. (R 336.1225, R 336.1702)
- 3. The permittee shall keep a separate written record of the following for the FG-Forms on a calendar month averaging period:
  - a) The type of each material used.
  - b) The VOC content of each material, with water (in percent by weight or pounds per gallon), as applied.
  - c) The usage rate (in pounds or gallons) of each material as applied.
  - d) The amount (in pounds) of each material reclaimed.
  - 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).

# VII. REPORTING

NA

## VIII. STACK/VENT RESTRICTIONS

NA

# IX. OTHER REQUIREMENTS