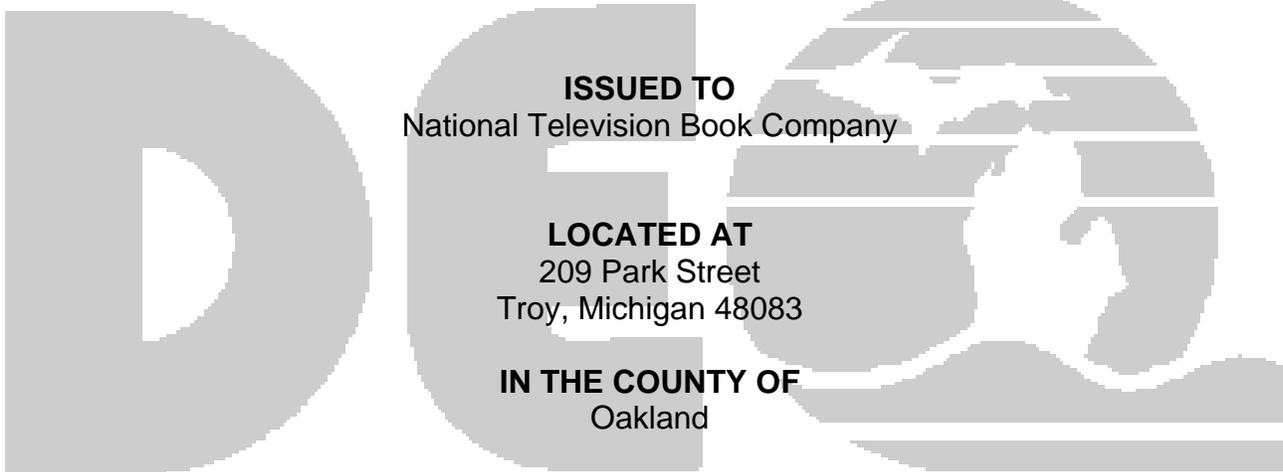


**MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION**

December 10, 2004

**NEW SOURCE REVIEW PERMIT TO INSTALL
No. 15-02A**



ISSUED TO
National Television Book Company

LOCATED AT
209 Park Street
Troy, Michigan 48083

IN THE COUNTY OF
Oakland

STATE REGISTRATION NUMBER
N7097

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 Part 5505(1) of Article II, Chapter I, Part 55 (Air Pollution Control) of P.A. 451 of 1994. 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 REQUIRED BY RULE 203: 12/2/2004 | |
| DATE PERMIT TO INSTALL APPROVED: 12/10/2004 | SIGNATURE: |
| DATE PERMIT VOIDED: | SIGNATURE: |
| DATE PERMIT REVOKED: | SIGNATURE: |

NEW SOURCE REVIEW PERMIT TO INSTALL

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Common Abbreviations / Acronyms Used in this Permit to Install

| Common Acronyms | | Pollutant/Measurement Abbreviations | |
|-----------------|---|-------------------------------------|--|
| AQD | Air Quality Division | BTU | British Thermal Unit |
| BACT | Best Available Control Technology | °C | Degrees Celsius |
| CAA | Clean Air Act | CO | Carbon Monoxide |
| CEM | Continuous Emission Monitoring | dscf | Dry standard cubic foot |
| CFR | Code of Federal Regulations | dscm | Dry standard cubic meter |
| COM | Continuous Opacity Monitoring | °F | Degrees Fahrenheit |
| EPA | Environmental Protection Agency | gr | Grains |
| EU | Emission Unit | Hg | Mercury |
| FG | Flexible Group | hr | Hour |
| GACS | Gallon of Applied Coating Solids | H ₂ S | Hydrogen Sulfide |
| GC | General Condition | HP | Horsepower |
| HAP | Hazardous Air Pollutant | lb | Pound |
| HVLP | High Volume Low Pressure * | m | Meter |
| ID | Identification | 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 | NO _x | Oxides of Nitrogen |
| MDEQ | Michigan Department of Environmental Quality | PM | Particulate Matter |
| MSDS | Material Safety Data Sheet | PM-10 | Particulate Matter less than 10 microns diameter |
| NESHAP | National Emission Standard for Hazardous Air Pollutants | pph | Pound per hour |
| NSPS | New Source Performance Standards | ppm | Parts per million |
| NSR | New Source Review | ppmv | Parts per million by volume |
| PS | Performance Specification | ppmw | Parts per million by weight |
| PSD | Prevention of Significant Deterioration | psia | Pounds per square inch absolute |
| PTE | Permanent Total Enclosure | psig | Pounds per square inch gauge |
| PTI | Permit to Install | scf | Standard cubic feet |
| RACT | Reasonable Available Control Technology | sec | Seconds |
| SC | Special Condition | SO ₂ | Sulfur Dioxide |
| SCR | Selective Catalytic Reduction | THC | Total Hydrocarbons |
| SRN | State Registration Number | tpy | Tons per year |
| TAC | Toxic Air Contaminant | µg | Microgram |
| VE | Visible Emissions | VOC | Volatile Organic Compounds |
| | | yr | Year |

* For High Volume Low Pressure (HVLP) applicators, the pressure measured at the HVLP gun air cap shall not exceed ten (10) pounds per square inch gauge (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. **[R336.1201(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, if it is decided not to pursue the installation, construction, reconstruction, relocation, or modification of the equipment allowed by this Permit to Install. **[R336.1201(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 R336.1210, 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. **[R336.1201(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. **[R336.1201(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 R336.1219 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 R336.1219. The written request shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Environmental Quality. **[R336.1219]**
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. **[R336.1901]**
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). **[R336.1912]**
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.

9. 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 R336.1301, 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 R336.1303. **[R336.1301]**
 - 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 R336.1370(2). **[R336.1370]**
13. The Department may require the permittee to conduct acceptable performance tests, at the permittee's expense, in accordance with R336.2001 and R336.2003, under any of the conditions listed in R336.2001. **[R336.2001]**

SPECIAL CONDITIONS

Emission Unit Identification

| Emission Unit ID | Emission Unit Description | Stack Identification |
|---|--|-----------------------------|
| EU-Litho-01 | The Heatset /Non-heatset Webfed Offset Lithographic Printing Process with Manual Wash. | SV-Litho-01 |
| EU-Litho-02 | The Heatset /Non-heatset Webfed Offset Lithographic Printing Process with Manual Wash. | SV-Litho-02 |
| EU-Litho-03 | The Heatset /Non-heatset Webfed Offset Lithographic Printing Process with Manual Wash. | SV-RTO |
| EU-Litho-04 | The Heatset /Non-heatset Webfed Offset Lithographic Printing Process with Manual Wash. | SV-RTO |
| EU-Litho-05 | The Heatset /Non-heatset Webfed Offset Lithographic Printing Process with Manual Wash. | SV-RTO |
| EU-Litho-06 | The Heatset /Non-heatset Webfed Offset Lithographic Printing Process with Manual Wash. | SV-RTO |
| Changes to the equipment described in this table are subject to the requirements of R336.1201, except as allowed by R336.1278 to R336.1290. | | |

Flexible Group Identification

| Flexible Group ID | Emission Units Included in Flexible Group | Stack Identification |
|--------------------------|---|------------------------------|
| FG-OldLitho | EU-Litho-01 and EU-Litho-02 | SV-Litho-01 & SV-Litho-02 |
| FG-NewLitho | EU-Litho-03, EU-Litho-04, EU-Litho-05, and EU-Litho-06. | SV-RTO |
| FG-Facility | All equipment at the stationary source including equipment covered by other permits, grand-fathered equipment and exempt equipment. | Not Applicable |

The following conditions apply to: FG-OldLitho

Emissions Limits

| | Pollutant | Equipment | Limit* | Time Period | Testing/ Monitoring Method | Applicable Requirements |
|------|--|--|--|---|--|---|
| 1.1a | VOC Content of the Fountain Solution | Each Lithographic Printing Press of the FG- OldLitho | < 5% By Weight as Applied, shall not contain Alcohol | Per change in type of fountain solution. | GC 13, SC 1.7, SC 1.8, SC 1.9 / Appendix A, SC 1.10 | R336.1702(a) |
| 1.1b | VOC | FG-OldLitho | 12.5 tpy (Stack Emissions) | 12-month rolling time period as determined at the end of each calendar month. | SC 1.7, SC 1.8, SC 1.10 | R336.1205(3), R336.1225, R336.1702(a) |
| 1.1c | VOC | FG-OldLitho | 4.5 tpy (Fugitive Emissions) | 12-month rolling time period as determined at the end of each calendar month. | SC 1.7, SC 1.8, SC 1.10 | R336.1205(3), R336.1225, R336.1702(a) |

* Limit:

Heatset Ink: Retention rate of 20 percent of the VOC in the ink applied to the paper, with 90 percent by weight overall capture efficiency of the remaining 80 percent by weight of VOC emitted.

Non-heatset Ink: Retention rate of 95 percent of the VOC in the ink applied to the paper, the remaining 5 percent by weight of VOC emitted as fugitive emissions.

Fountain Solution: Fugitive emissions of 30 percent by weight and an overall capture efficiency of 70 percent by weight of VOC emitted.

Cleanup Solution: Retention rate of 50 percent of the VOC in the shop towel and remaining 50 percent by weight as fugitive emissions

References:

DRAFT Guideline Series – *Control of VOC Emissions from Offset Lithographic Printing*, USEPA, Sept. 1993

Alternative Control Techniques Document: *Offset Lithographic Printing*, USEPA 453/R-94-054, June 1994

Process/Operational Limits

- 1.2 All waste inks, fountain solutions, and cleanup solvents (material) 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. **[R336.1205(3), R336.1225, R336.1702(a), R336.1901]**

- 1.3 The air pressure within each dryer of FG-OldLitho shall be maintained lower than the pressroom air pressure so that the air flows into the each dryer at all times. **[R336.1225, R336.1702(a), R336.1901, R336.1910]**

- 1.4 The permittee shall implement following listed pollution prevention exercise for the FG-OldLitho: **[R336.1225, R336.1702(a), R336.1901]**
- a) Eliminate (or use only on hard to clean spots) use of *type wash* cleaners or cleaners that contain hazardous air pollutants such as toluene, MEK, and xylene.
 - b) Collect and reuse cleaning solvent.
 - c) Ensure that used solvents and solvent saturated towels or wipes are not disposed with the trash.
 - d) Send solvents that cannot be reused off-site for recycling.
 - e) Conduct training on proper cleaning methods to assure success when using new materials and practices.
 - f) All press related cleaning solvents (blanket and roller washes) shall have composite partial vapor pressures that do not exceed 10 mmHg@20°C.
 - g) All containers of new and used VOC-containing press related cleaning materials (blanket and roller washes, and solvent-containing cleaning towels) shall be kept closed at all times.

Equipment

- 1.5 The permittee shall not operate FG-OldLitho unless all dryers are installed, maintained and operated in a satisfactory manner. Satisfactory operation requires that the each dryer is operating at a pressure lower than all adjacent areas so that air flows into the each dryer through all natural draft openings. **[R336.1205(3), R336.1225, R336.1702(a), R336.1910]**

Testing

- 1.6 The VOC content of any material, as received and as applied, shall be determined using federal Reference Test Method 24 (inks, coatings, fountain solution additives and cleaning solvents) or 24A (only publication rotogravure printing) 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. **[R336.1702(a), R336.2001, R336.2003, R336.2004, R336.2040(5)]**

Recordkeeping / Reporting / Notification

- 1.7 All required calculations shall be completed in a format acceptable to the AQD District Supervisor and made available by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any recordkeeping, reporting or notification special condition. **[R336.1225, R336.1702(a)]**
- 1.8 The permittee shall keep a separate written record of the following for the FG-OldLitho on a calendar month averaging period:
- a) The type of each material used.
 - b) The VOC content of each material, with and without water and exempt solvents, (in percent by weight or pounds per gallon), as received and 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) Record to demonstrate compliance with Special Condition No. 1.4.
 - 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.

The records shall be kept in a format acceptable to 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. **[R336.1205(3), R336.1225, R336.1702(a)]**

- 1.9 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. All records shall be kept on file for a period of at least five years and made available to the Department upon request. **[R336.1225, R336.1702(a)]**
- 1.10 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. All records shall be kept on file for a period of at least five years and made available to the Department upon request. **[R336.1225, R336.1702(a), R336.1901]**

Stacks/Vents Restrictions

| | Stack & Vent ID | Maximum Diameter (inches) | Minimum Height Above Ground Level (feet) | Applicable Requirement |
|---|----------------------------|----------------------------------|---|---|
| 1.11a | SV-Litho-01 | 11.0 | 54.0 | R336.1225, R336.1901, 40 CFR 52.21(c) & (d) |
| 1.11b | SV-Litho-02 | 11.0 | 54.0 | R336.1225, R336.1901, 40 CFR 52.21(c) & (d) |
| The exhaust gases shall be discharged unobstructed vertically upwards to the ambient air. | | | | |

Permit Dates

- 1.12 Within thirty days of issuance of this permit, the permittee shall label the each emission unit according to a method acceptable to the AQD District Supervisor. Within seven days of completing the labeling, the permittee shall notify the AQD District Supervisor, in writing, as to the date the labeling was completed. **[R336.1201]**

The following conditions apply to: FG-NewLitho

Emissions Limits

| | Pollutant | Equipment | Limit* | Time Period | Testing/ Monitoring Method | Applicable Requirements |
|------|--|--|--|---|---|---|
| 2.1a | VOC Content of the Fountain Solution | Each Lithographic Printing Press of the FG- NewLitho | < 5% By Weight as Applied, shall not contain Alcohol | Per change in type of fountain solution. | GC 13, SC 2.10, SC 2.11, SC 2.12 / Appendix A, SC 2.13 | R336.1702(a) |
| 2.1b | VOC | FG-NewLitho | 39.4 tpy (Stack & Fugitive Emissions) | 12-month rolling time period as determined at the end of each calendar month. | SC 2.10, SC 2.11, SC 2.13 | R336.1205(3), R336.1225, R336.1702(a) |

* Limit:

Heatset Ink: Retention rate of 20 percent of the VOC in the ink applied to the paper, with 90 percent by weights overall capture efficiency of the remaining 80 percent by weight of VOC emitted and a destruction efficiency of 95 percent by weight.

Non-heatset Ink: Retention rate of 95 percent of the VOC in the ink applied to the paper, the remaining 5 percent by weight of VOC emitted as fugitive emissions.

Fountain Solution: Fugitive emissions of 30 percent by weight and an overall capture efficiency of 70 percent by weight, and a destruction efficiency of 95 percent by weight.

Cleanup Solution: Retention rate of 50 percent of the VOC in the shop towel and remaining 50 percent by weight as fugitive emissions. Overall capture efficiency of 0 percent by weight, and destruction efficiency of 0 percent by weight for manual wash system.

References:

DRAFT Guideline Series – *Control of VOC Emissions from Offset Lithographic Printing*, USEPA, Sept. 1993
 Alternative Control Techniques Document: *Offset Lithographic Printing*, USEPA 453/R-94-054, June 1994

Process/Operational Limits

- 2.2 All waste inks, fountain solutions, and cleanup solvents (material) 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. **[R336.1205(3), R336.1225, R336.1702(a), R336.1901]**
- 2.3 The air pressure within each dryer portion of the FG-NewLitho shall be maintained lower than the pressroom air pressure so that the air flows into the each dryer at all times. **[R336.1225, R336.1702(a), R336.1901, R336.1910]**
- 2.4 The permittee shall implement following listed pollution prevention exercise for the FG-NewLitho: **[R336.1225, R336.1702(a), R336.1901]**

- a) Eliminate (or use only on hard to clean spots) use of *type wash* cleaners or cleaners that contain hazardous air pollutants such as toluene, MEK, and xylene.
- b) Collect and reuse cleaning solvent.
- c) Ensure that used solvents and solvent saturated towels or wipes are not disposed with the trash.
- d) Send solvents that cannot be reused off-site for recycling.
- e) Conduct training on proper cleaning methods to assure success when using new materials and practices.
- f) All press related cleaning solvents (blanket and roller washes) shall have composite partial vapor pressures that do not exceed 10 mmHg@20°C.
- g) All containers of new and used VOC-containing press related cleaning materials (blanket and roller washes, and solvent-containing cleaning towels) shall be kept closed at all times.

Equipment

- 2.5 The permittee shall not operate FG-NewLitho unless all dryers are installed, maintained and operated in a satisfactory manner. Satisfactory operation requires that the each dryer is operating at a pressure lower than all adjacent areas so that air flows into the each dryer through all natural draft openings. **[R336.1205(3), R336.1225, R336.1702(a), R336.1910]**
- 2.6 The permittee shall not operate FG-NewLitho unless the thermal oxidizer is installed, maintained and operated in a satisfactory manner. Satisfactory operation of the thermal oxidizer requires a minimum VOC destruction efficiency of 95 percent (by weight), and maintaining a minimum temperature of 1450 °F and a minimum retention time of 0.5 seconds. **[R336.1205(3), R336.1225, R336.1702(a), R336.1901, R336.1910]**

Testing

- 2.7 Within 60 days of achieving the maximum production rate, but not later than 180 days after commencement of trial operation, verification of destruction efficiency of the thermal oxidizer used for FG-NewLitho by testing at owner's expense, in accordance with Department requirements, will be required. No less than 30 days prior to testing, a complete test plan shall be submitted to the AQD. The final plan must be approved by the AQD prior to testing. Verification of capture and destruction efficiencies includes the submittal of a complete report of the test results to the AQD within 60 days following the last date of the test. **[R336.2001, R336.2003, R336.2004, R336.1205]**
- 2.8 The VOC content of any material, as received and as applied, shall be determined using federal Reference Test Method 24 (inks, coatings, fountain solution additives and cleaning solvents) or 24A (only publication rotogravure printing) 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. **[R336.1702(a), R336.2001, R336.2003, R336.2004, R336.2040(5)]**

Monitoring

- 2.9 The permittee shall monitor, in a satisfactory manner, the temperature in the thermal oxidizer on a continuous basis in a manner and with instrumentation acceptable to the Air Quality Division. **[R336.1225, R336.1702(a), R336.1901]**

Recordkeeping / Reporting / Notification

- 2.10 All required calculations shall be completed in a format acceptable to the AQD District Supervisor and made available by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any recordkeeping, reporting or notification special condition. **[R336.1225, R336.1702(a)]**

2.11 The permittee shall keep a separate written record of the following for the FG-NewLitho on a calendar month averaging period:

- a) The type of each material used.
- b) The VOC content of each material, with and without water and exempt solvents, (in percent by weight or pounds per gallon), as received and 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) Record to demonstrate compliance with Special Condition No. 2.4.
- 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.

The records shall be kept in a format acceptable to 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. **[R336.1205, R336.1225, R336.1702(a)]**

2.12 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. All records shall be kept on file for a period of at least five years and made available to the Department upon request. **[R336.1225, R336.1702(a)]**

2.13 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. All records shall be kept on file for a period of at least five years and made available to the Department upon request. **[R336.1225, R336.1702(a), R336.1901]**

Stacks/Vents Restrictions

| | Stack & Vent ID | Maximum Diameter (inches) | Minimum Height Above Ground Level (feet) | Applicable Requirement |
|---|----------------------------|----------------------------------|---|---|
| 2.14 | SV-RTO | 22.0 | 40.0 | R336.1225, R336.1901, 40 CFR 52.21(c) & (d) |
| The exhaust gases shall be discharged unobstructed vertically upwards to the ambient air. | | | | |

Permit Dates

2.15 Within thirty days of issuance of this permit, the permittee shall label the each emission unit according to a method acceptable to the AQD District Supervisor. Within seven days of completing the labeling, the permittee shall notify the AQD District Supervisor, in writing, as to the date the labeling was completed. **[R336.1201]**

The following conditions apply to: FG-Facility

Emissions Limits

| | Pollutant | Equipment | Limit | Time Period | Testing/ Monitoring Method | Applicable Requirements |
|------|---------------------|------------------|--------------|---|---|------------------------------------|
| 3.1a | VOCs | FG-Facility | < 90.0 tpy | 12-month rolling time period as determined at the end of each calendar month. | SC 3.4, SC 3.5 | R336.1205(3) |
| 3.1b | Each Individual HAP | FG-Facility | < 9.0 tpy | 12-month rolling time period as determined at the end of each calendar month. | SC 3.4, SC 3.6 | R336.1205(3) |
| 3.1c | Aggregate HAPs | FG-Facility | < 22.5 tpy | 12-month rolling time period as determined at the end of each calendar month. | SC 3.4, SC 3.6 | R336.1205(3) |

Testing

- 3.2 The VOC content of any ink, fountain solution, and cleanup solvent (material) as applied and as received shall be determined using federal Reference Test Method 24 or 24A per the requirements of Rule 1040(5). Upon prior approval of the District Supervisor, Air Quality Division, VOC content may alternatively be determined from manufacturer's formulation data. **[R336.1702(a), R336.2001, R336.2003, R336.2004, R336.2040(5)]**
- 3.3 The HAP content of any material, as applied and as received, shall be determined using manufacturer's formulation data. Upon request of the District Supervisor, the HAP content of manufacturer's formulation data shall be verified using Method 311. **[R336.1702(a), R336.2001, R336.2003, R336.2004]**

Recordkeeping/Reporting/Notification

- 3.4 All required calculations shall be completed in a format acceptable to the AQD District Supervisor and made available by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any recordkeeping, reporting or notification special condition. **[R336.1225, R336.1702(a)]**
- 3.5 The permittee shall keep the following information on a calendar month basis for the FG-Facility:
- a) Each material used and reclaimed
 - b) As received, VOC content of each material (with water)
 - c) VOC mass emission calculations determining the monthly emission rate in tons per month
 - d) Total combined VOC mass emission calculations determining the yearly emission rate in tons per 12 month rolling time period as determined at the end of each calendar month.

The records are for the purpose of compliance demonstration and shall be kept in the format approved by the Air Quality Division District Supervisor. The records shall be kept on site for a period of at least

five years and made available to the Department upon request. **[R336.1205(3), R336.1225, R336.1702(a)]**

- 3.6 The permittee shall keep the following information on a calendar month basis for FG-Facility:
- a) Gallons or pounds of each material used.
 - b) Where applicable, gallons or pounds of each material reclaimed.
 - c) HAP content, in pounds per gallon or pounds per pound, of each 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 records shall be kept in a format acceptable to 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. **[R336.1205, R336.1224, R336.1225, R336.1901]**

- 3.7 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. All records shall be kept on file for a period of at least five years and made available to the Department upon request. **[R336.1205(3), R336.1225, R336.1702(a)]**

