

*West Virginia Department of Environmental Protection*

*Division of Air Quality*

*Jim Justice  
Governor*

*Austin Caperton  
Cabinet Secretary*

# Permit to Modify



**R13-2317G**

*This permit is issued in accordance with the West Virginia Air Pollution Control Act (West Virginia Code §§ 22-5-1 et seq.) and 45 C.S.R. 13 — Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits and Procedures for Evaluation. The permittee identified at the facility listed below is authorized to construct the stationary sources of air pollutants identified herein in accordance with all terms and conditions of this permit.*

Issued to:  
**DALB, Inc.**  
**Kearneysville Facility**  
**037-00061**

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*William Fred Durham*  
*Director*

*Issued: Draft*

This permit will supercede and replace Permit R13-2317F.

Facility Location: Kearneysville, Jefferson County, West Virginia  
Mailing Address: 73 Industrial Blvd., Kearneysville, WV 25430  
Facility Description: Commercial Printing  
SIC Codes: 2759  
UTM Coordinates: 252.2 km Easting • 4,359.8 km Northing • Zone 18  
Permit Type: Modification  
Description of Change: Addition of a printing line, addition of a UV printer, modification of permit limits, removal of a propane dryer, update operations in the permit. This is an after-the-fact Modification Permit where the Installation of the proposed equipment was installed in 2016 and previous.

*Any person whose interest may be affected, including, but not necessarily limited to, the applicant and any person who participated in the public comment process, by a permit issued, modified or denied by the Secretary may appeal such action of the Secretary to the Air Quality Board pursuant to article one [§§ 22B-1-1 et seq.], Chapter 22B of the Code of West Virginia. West Virginia Code §22-5-14.*

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*The source is not subject to 45CSR30.*

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## 1.0 Emission Units

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
1S1	1E1	Sign Line 1	1982	N/A	None
1S2	1E2	Sign Line 1 Propane Dryer	1982	0.5 MMBtu/hr	None
2S	2E	Sign Line 2 (Previously <i>Sign Line 3</i> )	1982	N/A	None
3S	3E	Sign Line 3 (Previously <i>Sign Line 5</i> )	2006	N/A	None
5S	5E	Decal Line 1	1982	N/A	None
6S1 - 6S5	6E1 - 6E5	Decal Inline (Previously <i>Decal Line 3</i> )	2002	N/A	None
4S1 - 4S5	4E1 - 4E5	Sign Inline Presses	1982	N/A	None
7S1	7E1	Small Format Digital Printing (Previously <i>Flavor Card Process</i> )	2008	N/A	None
7S2	7E2	Small Format Digital Printing Digital Printer (Previously <i>Flavor Card Process</i> )	2001	N/A	None
8S	8E1 - 8E5	Small Format Digital Printing Presstak UV Printing	2010	N/A	None
9S	9E1	Small Format Digital Printing UV Finishing Press	2016	N/A	None
10S	10E1	Vutek Digital Press 1	2013	N/A	None
11S	11E1	Vutek Digital Press 2	2014	N/A	None
12S	12E1	Vutek Digital Press 3	2016	N/A	None
13S	13E1	Clean Up Solvents	1982	N/A	None
14S	14E1	Thermoforming and Trimming	2015	N/A	None

## 2.0.General Conditions

### 2.1.Definitions

- 2.1.1. All references to the "West Virginia Air Pollution Control Act" or the "Air Pollution Control Act" mean those provisions contained in W.Va. Code §§ 22-5-1 to 22-5-18.
- 2.1.2. The "Clean Air Act" means those provisions contained in 42 U.S.C. §§ 7401 to 7671q, and regulations promulgated thereunder.
- 2.1.3. "Secretary" means the Secretary of the Department of Environmental Protection or such other person to whom the Secretary has delegated authority or duties pursuant to W.Va. Code §§ 22-1-6 or 22-1-8 (45 CSR § 30-2.12.). The Director of the Division of Air Quality is the Secretary's designated representative for the purposes of this permit.

### 2.2.Acronyms

<b>CAA</b> Clean Air Act Amendments	<b>PM<sub>2.5</sub></b> Particulate Matter less than 2.5µm in diameter
<b>CB</b> Confidential Business Information	<b>PM<sub>10</sub></b> Particulate Matter less than 10µm in diameter
<b>CEM</b> Continuous Emission Monitor	<b>Ppb</b> Pounds per Batch
<b>CES</b> Certified Emission Statement	<b>pph</b> Pounds per Hour
<b>C.F.R. or CFR</b> Code of Federal Regulations	<b>ppm</b> Parts per Million
<b>CO</b> Carbon Monoxide	<b>Ppmv or</b> Parts per million by volume
<b>C.S.R. or CSR</b> Codes of State Rules	<b>PSD</b> Prevention of Significant Deterioration
<b>DAQ</b> Division of Air Quality	<b>psi</b> Pounds per Square Inch
<b>DEP</b> Department of Environmental Protection	<b>SIC</b> Standard Industrial Classification
<b>dscm</b> Dry Standard Cubic Meter	<b>SIP</b> State Implementation Plan
<b>FOIA</b> Freedom of Information Act	<b>SO<sub>2</sub></b> Sulfur Dioxide
<b>HAP</b> Hazardous Air Pollutant	<b>TAP</b> Toxic Air Pollutant
<b>HON</b> Hazardous Organic NESHAP	<b>TPY</b> Tons per Year
<b>HP</b> Horsepower	<b>TR</b> Total Reduced Sulfur
<b>lbs/hr</b> Pounds per Hour	<b>TSPT</b> Total Suspended Particulate
<b>LDAR</b> Leak Detection and Repair	<b>USEPA</b> United States Environmental Protection Agency
<b>M</b> Thousand	<b>UTM</b> Universal Transverse Mercator
<b>MACT</b> Maximum Achievable Control Technology	<b>VEE</b> Visual Emissions Evaluation
<b>MDHI</b> Maximum Design Heat Input	<b>VOC</b> Volatile Organic Compounds
<b>MM</b> Million	<b>VOL</b> Volatile Organic Liquids
<b>MMBtu/hr or</b> Million British Thermal Units	
<b>mmbtu/hr</b> per Hour	
<b>MMCF/hr or</b> Million Cubic Feet per Hour	
<b>mmcf/hr</b>	
<b>NA</b> Not Applicable	
<b>NAAQS</b> National Ambient Air Quality Standards	
<b>NESHAPS</b> National Emissions Standards for Hazardous Air Pollutants	
<b>NO<sub>x</sub></b> Nitrogen Oxides	
<b>NSPS</b> New Source Performance Standards	
<b>PM</b> Particulate Matter	

## **2.3. Authority**

This permit is issued in accordance with West Virginia Air Pollution Control Law W.Va. Code §§22-5-1 et seq. and the following Legislative Rules promulgated thereunder:

- 2.3.1. 45CSR13 – *Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits and Procedures for Evaluation;*

## **2.4. Term and Renewal**

- 2.4.1. This permit supercedes and replaces previously issued Permit R13-2317E. This permit shall remain valid, continuous and in effect unless it is revised, suspended, revoked or otherwise changed under an applicable provision of 45CSR13 or any applicable legislative rule.

## **2.5. Duty to Comply**

- 2.5.1. The permitted facility shall be constructed and operated in accordance with the plans and specifications filed in Permit Application R13-2317, R13-2317A, R13-2317B, R13-2317C, R13-2317D, R13-2317E, R13-2317F, and any modifications, administrative updates, or amendments thereto. The Secretary may suspend or revoke a permit if the plans and specifications upon which the approval was based are not adhered to;  
**[45CSR§§13-5.11 and 13-10.3]**
- 2.5.2. The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the West Virginia Code and the Clean Air Act and is grounds for enforcement action by the Secretary or USEPA;
- 2.5.3. Violations of any of the conditions contained in this permit, or incorporated herein by reference, may subject the permittee to civil and/or criminal penalties for each violation and further action or remedies as provided by West Virginia Code 22-5-6 and 22-5-7;
- 2.5.4. Approval of this permit does not relieve the permittee herein of the responsibility to apply for and obtain all other permits, licenses and/or approvals from other agencies; i.e., local, state and federal, which may have jurisdiction over the construction and/or operation of the source(s) and/or facility herein permitted.

## **2.6. Duty to Provide Information**

The permittee shall furnish to the Secretary within a reasonable time any information the Secretary may request in writing to determine whether cause exists for administratively updating, modifying, revoking or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Secretary copies of records to be kept by the permittee. For information claimed to be confidential, the permittee shall furnish such records to the Secretary along with a claim of confidentiality in accordance with 45CSR31. If confidential information is to be sent to USEPA, the permittee shall directly provide such information to USEPA along with a claim of confidentiality in accordance with 40 C.F.R. Part 2.

## **2.7. Duty to Supplement and Correct Information**

Upon becoming aware of a failure to submit any relevant facts or a submittal of incorrect information in any permit application, the permittee shall promptly submit to the Secretary such supplemental facts or corrected information.

## **2.8. Administrative Update**

The permittee may request an administrative update to this permit as defined in and according to the procedures specified in 45CSR13.

**[45CSR§13-4]**

## **2.9. Permit Modification**

The permittee may request a minor modification to this permit as defined in and according to the procedures specified in 45CSR13.

**[45CSR§13-5.4.]**

## **2.10. Major Permit Modification**

The permittee may request a major modification to this permit as defined in and according to the procedures specified in 45CSR14 or 45CSR19, as appropriate.

**[45CSR§14-7 or 45CSR§19-14]**

## **2.11. Inspection and Entry**

The permittee shall allow any authorized representative of the Secretary, upon the presentation of credentials and other documents as may be required by law, to perform the following:

- a. At all reasonable times (including all times in which the facility is in operation) enter upon the permittee's premises where a source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect at reasonable times (including all times in which the facility is in operation) any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit;
- d. Sample or monitor at reasonable times substances or parameters to determine compliance with the permit or applicable requirements or ascertain the amounts and types of air pollutants discharged.

## **2.12. Emergency**

- 2.12.1. An "emergency" means any situation arising from sudden and reasonable unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.
- 2.12.2. Effect of any emergency. An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions of Section 2.12.3 are not met.
- 2.12.3. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:
  - a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;
  - b. The permitted facility was at the time being properly operated;
  - c. During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and,
  - d. The permittee submitted notice of the emergency to the Secretary within one (1) working day of the time when emission limitations were exceeded due to the emergency and made a request for variance, and as applicable rules provide. This notice must contain a detailed description of the emergency, any steps taken to mitigate emission, and corrective actions taken.
- 2.12.4. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.
- 2.12.5. The provisions of this section are in addition to any emergency or upset provision contained in any applicable requirement.

## **2.13. Need to Halt or Reduce Activity Not a Defense**

It shall not be a defense for a permittee in an enforcement action that it should have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. However, nothing in this paragraph shall be construed as precluding consideration of a need to halt or reduce activity as a mitigating factor in determining penalties for noncompliance if the health, safety, or environmental impacts of halting or reducing operations would be more serious than the impacts of continued operations.

## **2.14. Suspension of Activities**

In the event the permittee should deem it necessary to suspend, for a period in excess of sixty (60) consecutive calendar days, the operations authorized by this permit, the permittee shall notify the Secretary,



in writing, within two (2) calendar weeks of the passing of the sixtieth (60) day of the suspension period.

#### **2.15. Property Rights**

This permit does not convey any property rights of any sort or any exclusive privilege.

#### **2.16. Severability**

The provisions of this permit are severable and should any provision(s) be declared by a court of competent jurisdiction to be invalid or unenforceable, all other provisions shall remain in full force and effect.

#### **2.17. Transferability**

This permit is transferable in accordance with the requirements outlined in Section 10.1 of 45CSR13.  
**[45CSR§13-10.1]**

#### **2.18. Notification Requirements**

The permittee shall notify the Secretary, in writing, no later than thirty (30) calendar days after the actual startup of the operations authorized under this permit.

#### **2.19. Credible Evidence**

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defense otherwise available to the permittee including, but not limited to, any challenge to the credible evidence rule in the context of any future proceeding.

### 3.0. Facility-Wide Requirements

#### 3.1. Limitations and Standards

- 3.1.1. **Open burning.** The open burning of refuse by any person, firm, corporation, association or public agency is prohibited except as noted in 45CSR§6-3.1.  
[45CSR§6-3.1.]
- 3.1.2. **Open burning exemptions.** The exemptions listed in 45CSR§6-3.1 are subject to the following stipulation: Upon notification by the Secretary, no person shall cause, suffer, allow or permit any form of open burning during existing or predicted periods of atmospheric stagnation. Notification shall be made by such means as the Secretary may deem necessary and feasible.  
[45CSR§6-3.2.]
- 3.1.3. **Asbestos.** The permittee is responsible for thoroughly inspecting the facility, or part of the facility, prior to commencement of demolition or renovation for the presence of asbestos and complying with 40 C.F.R. § 61.145, 40 C.F.R. § 61.148, and 40 C.F.R. § 61.150. The permittee, owner, or operator must notify the Secretary at least ten (10) working days prior to the commencement of any asbestos removal on the forms prescribed by the Secretary if the permittee is subject to the notification requirements of 40 C.F.R. § 61.145(b)(3)(i). The USEPA, the Division of Waste Management and the Bureau for Public Health - Environmental Health require a copy of this notice to be sent to them.  
[40CFR§61.145(b) and 45CSR§15]
- 3.1.4. **Odor.** No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor at any location occupied by the public.  
[45CSR§4-3.1 State-Enforceable only.]
- 3.1.5. **Permanent shutdown.** A source which has not operated at least 500 hours in one 12-month period within the previous five (5) year time period may be considered permanently shutdown, unless such source can provide to the Secretary, with reasonable specificity, information to the contrary. All permits may be modified or revoked and/or reapplication or application for new permits may be required for any source determined to be permanently shutdown.  
[45CSR§13-10.5.]
- 3.1.6. **Standby plan for reducing emissions.** When requested by the Secretary, the permittee shall prepare standby plans for reducing the emissions of air pollutants in accordance with the objectives set forth in Tables I, II, and III of 45 C.S.R. 11.  
[45CSR§11-5.2.]

#### 3.2. Monitoring Requirements

*[Reserved]*

#### 3.3. Testing Requirements

- 3.3.1. **Stack testing.** As per provisions set forth in this permit or as otherwise required by the Secretary, in accordance with the West Virginia Code, underlying regulations, permits and orders, the

permittee shall conduct test(s) to determine compliance with the emission limitations set forth in this permit and/or established or set forth in underlying documents. The Secretary, or his duly authorized representative, may at his option witness or conduct such test(s). Should the Secretary exercise his option to conduct such test(s), the operator shall provide all necessary sampling connections and sampling ports to be located in such manner as the Secretary may require, power for test equipment and the required safety equipment, such as scaffolding, railings and ladders, to comply with generally accepted good safety practices. Such tests shall be conducted in accordance with the methods and procedures set forth in this permit or as otherwise approved or specified by the Secretary in accordance with the following:

- a. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with 40 C.F.R. Parts 60, 61, and 63 in accordance with the Secretary's delegated authority and any established equivalency determination methods which are applicable. If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit may be revised in accordance with 45CSR§13-4 or 45CSR§13-5.4 as applicable.
- b. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with applicable requirements which do not involve federal delegation. In specifying or approving such alternative testing to the test methods, the Secretary, to the extent possible, shall utilize the same equivalency criteria as would be used in approving such changes under Section 3.3.1.a. of this permit. If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit may be revised in accordance with 45CSR§13-4 or 45CSR§13-5.4 as applicable.
- c. All periodic tests to determine mass emission limits from or air pollutant concentrations in discharge stacks and such other tests as specified in this permit shall be conducted in accordance with an approved test protocol. Unless previously approved, such protocols shall be submitted to the Secretary in writing at least thirty (30) days prior to any testing and shall contain the information set forth by the Secretary. In addition, the permittee shall notify the Secretary at least fifteen (15) days prior to any testing so the Secretary may have the opportunity to observe such tests. This notification shall include the actual date and time during which the test will be conducted and, if appropriate, verification that the tests will fully conform to a referenced protocol previously approved by the Secretary.  
[WV Code § 22-5-4(a)(15)]

### **3.4. Recordkeeping Requirements**

- 3.4.1. **Retention of records.** The permittee shall maintain records of all information (including monitoring data, support information, reports and notifications) required by this permit recorded in a form suitable and readily available for expeditious inspection and review. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation. The files shall be maintained for at least five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent two (2) years of data shall be maintained on site. The remaining three (3) years of data may be maintained off site, but must remain accessible within a reasonable time. Where appropriate, the

permittee may maintain records electronically (on a computer, on computer floppy disks, CDs, DVDs, or magnetic tape disks), on microfilm, or on microfiche.

- 3.4.2. **Odors.** For the purposes of 45CSR4, the permittee shall maintain a record of all odor complaints received, any investigation performed in response to such a complaint, and any responsive action(s) taken.

**[45CSR§4. State-Enforceable only.]**

### 3.5. Reporting Requirements

- 3.5.1. **Responsible official.** Any application form, report, or compliance certification required by this permit to be submitted to the DAQ and/or USEPA shall contain a certification by the responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.
- 3.5.2. **Confidential information.** A permittee may request confidential treatment for the submission of reporting required by this permit pursuant to the limitations and procedures of W.Va. Code § 22-5-10 and 45CSR31.
- 3.5.3. **Correspondence.** All notices, requests, demands, submissions and other communications required or permitted to be made to the Secretary of DEP and/or USEPA shall be made in writing and shall be deemed to have been duly given when delivered by hand, or mailed first class with postage prepaid to the address(es) set forth below or to such other person or address as the Secretary of the Department of Environmental Protection may designate:

**If to the DAQ:**

Director  
WVDEP  
Division of Air Quality  
601 57th Street, SE  
Charleston, WV 25304-2345

**If to the USEPA:**

Associate Director  
Office of Enforcement and Compliance Assistance  
(3AP20)  
U. S. Environmental Protection Agency  
Region III  
1650 Arch Street  
Philadelphia, PA 19103-2029

3.5.4. **Operating Fee.**

- 3.5.4.1. In accordance with 45CSR22 – Air Quality Management Fee Program, the permittee shall not operate nor cause to operate the permitted facility or other associated facilities on the same or contiguous sites comprising the plant without first obtaining and having in current effect a Certificate to Operate (CTO). Such Certificate to Operate (CTO) shall be renewed annually, shall be maintained on the premises for which the certificate has been issued, and shall be made immediately available for inspection by the Secretary or his/her duly authorized representative.
- 3.5.5. **Emission inventory.** At such time(s) as the Secretary may designate, the permittee herein shall prepare and submit an emission inventory for the previous year, addressing the emissions from the facility and/or process(es) authorized herein, in accordance with the emission inventory submittal requirements

of the Division of Air Quality. After the initial submittal, the Secretary may, based upon the type and quantity of the pollutants emitted, establish a frequency other than on an annual basis.

## 4.0. Source-Specific Requirements

### 4.1. Limitations and Standards

- 4.1.1. No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any process source operation which is greater than twenty (20) percent opacity, except as noted in subsections 3.2, 3.3, 3.4, 3.5, 3.6, and 3.7. **[45CSR7-3.1]** (IE2)
- 4.1.2. Source ID No. 1S, 2S, 3S, 4S, 5S, 6S, 7S, 8S, 9S, 10S, 11S, 12S, and 13S shall be operated in accordance with the corresponding operating scenarios listed in the following table.

Source ID No.	Operating Scenarios
1S1 Sign Line 1 UV Emissions	UV Inks/UV Dryer or Solvent Inks/Propane Dryer
1S2 Sign Line 1 Combustion Emissions	
2S Sign Line 2 UV Emissions	UV Inks/Electric Dryer
3S Sign Line 3 UV Emissions	UV Inks/Electric Dryer
5S Decal Line 1 UV Emissions	UV Inks/UV Dryer
6S1 6S2 6S3 6S4 6S5 Decal Inline UV Emissions	UV Inks/ UV Dryer
4S1 4S2 4S3 4S4 4S5 In Line Press UV Emissions	UV Inks/UV Dryer
7S1 Small Format Digital Printing Pre-coat and Finishing	Pre-Coat/UV Ink/UV Dryer
7S2 Small Format Digital Printing Digital Printers	
8S Small Format Digital Printing Presstek UV Printer	UV Inks

Source ID No.	Operating Scenarios
9S Small Format Digital Printing UV Finishing Press	UV Inks
10S Vutek Digital Press 1	UV Inks
11S Vutek Digital Press 2	UV Inks
12S Vutek Digital Press 3	UV Inks
13S Fugitive Emissions from Solvent Usage	Solvents

- 4.1.3. Maximum hourly emission rates from 1E1 - 12E1 shall not exceed those listed in the following table. Compliance with the hourly limits shall be demonstrated on the basis of an hourly average over all hours of operation for that month.

Emission Point IDs	Maximum Hourly Emissions (lb/hr)					
	CO	NO <sub>x</sub>	PM	SO <sub>2</sub>	VOC	Total HAPs
1E - 12E	0.01	0.08	0.01	0.01	7.92	2.20

- 4.1.4. Maximum annual emission rates shall not exceed those listed in following table. Compliance with the annual limits shall be demonstrated on the basis of a rolling continuous twelve (12) month total.

Emission Point IDs	Maximum Yearly Emissions (tpy)					
	CO	NO <sub>x</sub>	PM	SO <sub>x</sub>	VOC	Total HAPs
1E1 - 12E1	0.01	0.02	0.01	0.01	12.21	0.28

- 4.1.5. Maximum hourly and annual emission rates for Sign In Line 1, Source ID No. 4S, shall not exceed 0.53 pounds per hour (lb/hr) and 0.18 ton per year (tpy) of Volatile Organic Compounds (VOC).
- 4.1.6. Maximum hourly and annual emission rates for the Small Format Digital Printing, Source ID No. 7S, shall not exceed 3.30 pounds per hour (lb/hr) and 8.20 tons per year (tpy) of Volatile Organic Compounds (VOC).
- 4.1.7. Maximum hourly and annual emission rates for the Cleanup Solvents, Source ID No. 13S, shall not exceed those listed in the following table.

Emission Point IDs	Maximum Hourly (lb/hr) and Annual (tpy) Emission					
	VOC		Total HAPs		Glycol Ethers	
	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy
11E	15.40	48.01	4.93	13.24	2.54	7.92

- 4.1.8. Maximum hourly and annual emission rates for the Vutek Printers, Source ID Nos. 10S - 12S, shall not exceed 0.06 pounds per hour (lb/hr) and 0.27 ton per year (tpy) of Volatile Organic Compounds.
- 4.1.9. The permittee shall utilize only propane as fuel for the 0.5 MMBTU/hr propane fired dryers on Sign Line 1. The total combined propane usage shall not exceed 4,772 gallons per year. Compliance with the annual propane usage limit shall be demonstrated on the basis of a rolling continuous twelve (12) month total.
- 4.1.10. The use of any material containing hazardous air pollutants and/or toxic air pollutants not previously identified in Permit Applications R13-2317, R13-2317A, R13-2327B, R13-2317C, R13-2317D, R13-2317E, R13-2317F, and any amendments thereto shall not be used without the prior written approval of the Secretary.
- 4.1.11. The facility-wide emission rate of any single HAP shall not equal or exceed 8.06 tons per year.
- 4.1.12. The hourly and annual emission rates for the Cleanup Solvents 13S, Source ID No. 13S, shall not exceed 2.54 pounds per hour (lb/hr) and 7.92 tons per year (tpy) of Glycol Ethers.
- 4.1.13. The following conditions and requirements are specific to the 3 trimmers 14S:
- Each trimmer shall have a dedicated enclosure. Each trimmer shall only be operated when the doors associated to each dedicated enclosure are closed.  
**[45 CSR §7-5.1]**
  - For the trimmer with a ventilation system that goes to a dust collector. The fabric filter for each system shall be inspected at least once per month and replaced if needed.  
**[45 CSR §7-5.1]**
  - Visible emissions from building vents shall not exceed 20 percent opacity.  
**[45 CSR §7-3.1]**
- 4.1.14. **Operation and Maintenance of Air Pollution Control Equipment.** The permittee shall, to the extent practicable, install, maintain, and operate all pollution control equipment listed in Section 1.0 and associated monitoring equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions, or comply with any more stringent limits set forth in this permit or as set forth by any State rule, Federal regulation, or alternative control plan approved by the Secretary.  
**[45CSR§13-5.11.]**

## 4.2. Monitoring Requirements

- 4.2.1. The permittee shall monitor the following monitor the material usage (inks, solvents, other coatings) on a monthly and annual basis, which shall include but not limited to the following:



- a. Material Name, Manufacturer, and ID No.
  - b. Amount used in gallons
  - c. VOC Content
  - d. Glycol Ethers Content
  - c. Specific HAP and HAP Content
  - e. Total HAP Content
  - f. Hours of Operation
- 4.2.2. The permittee shall monitor on a monthly and annual basis the amount of propane consumed for Sign Line 1 as an aggregate total.

#### 4.3. Testing Requirements

N/A - See Facility - Wide Testing Requirements, Section 3.3.

#### 4.4. Recordkeeping Requirements

- 4.4.1. **Record of Monitoring.** The permittee shall keep records of monitoring information that include the following:
- a. The date, place as defined in this permit and time of sampling or measurements;
  - b. The date(s) analyses were performed;
  - c. The company or entity that performed the analyses;
  - d. The analytical techniques or methods used;
  - e. The results of the analyses; and
  - f. The operating conditions existing at the time of sampling or measurement.
- 4.4.2. **Record of Maintenance of Air Pollution Control Equipment.** For all pollution control equipment listed in Section 1.0, the permittee shall maintain accurate records of all required pollution control equipment inspection and/or preventative maintenance procedures.
- 4.4.3. **Record of Malfunctions of Air Pollution Control Equipment.** For all air pollution control equipment listed in Section 1.0, the permittee shall maintain records of the occurrence and duration of any malfunction or operational shutdown of the air pollution control equipment during which excess emissions occur. For each such case, the following information shall be recorded:
- a. The equipment involved.
  - b. Steps taken to minimize emissions during the event.
  - c. The duration of the event.

- d. The estimated increase in emissions during the event.

For each such case associated with an equipment malfunction, the additional information shall also be recorded:

- e. The cause of the malfunction.
- f. Steps taken to correct the malfunction.
- g. Any changes or modifications to equipment or procedures that would help prevent future recurrences of the malfunction.

4.4.4. For the purpose of demonstrating compliance with the emission limits set forth in Section 4.1.3. through 4.1.8 and 4.1.11 the permittee shall:

- a. Maintain the following information on a monthly basis utilizing the forms attached as Appendix A and Appendix B or forms of similar format containing the following information:
  - 1. The name, manufacturer, and ID No. of each material (e.g., ink, coating, solvent, etc.);
  - 2. The volume (in gallons or other appropriate units) of each material as applied or used on a monthly basis.
  - 3. The VOC and HAP content (by constituent HAP and total HAP) of each material (in pounds per gallon or other appropriate units);
  - 4. The total hours of operation as an aggregate for Sign Line 1, Sign Line 2, Sign Line 3, Sign Line Inline, Decal Line 1, Decal Inline, and Vutek Printers according to Appendix A.
  - 5. The total hours of operation for each of the following: In Line 1, Small Format Digital Printing, and Cleanup Solvents according Appendix B.
- b. For processes grouped according to Appendix A, calculate and maintain records of the VOC and HAP (by constituent HAP and total HAP) emissions utilizing the forms attached as Appendix D or forms similar containing the following information:
  - 1. Hourly VOC and HAP emissions (by constituent HAP and total HAP) for grouped or individual process as grouped according to Appendix D, as averaged over the monthly hours of operation;
  - 2. Rolling continuous twelve (12) month total VOC and HAP (by constituent HAP and total HAP) emissions for each grouped or individual process as grouped according to Appendix D.
- c. The following formulas and methods shall be used to determine the quantities specified in Sections a. and b. above utilizing the forms attached as Appendix E or forms similar containing the following information.
  - 1. The VOC and HAP (by constituent HAP and total HAP) content shall be determined by one of the following methods:
    - i. Certified Product Data Sheets or an equivalent provided by the material supplier;
    - ii. A test conducted, or have conducted, by the permittee to determine the applicable quantities using either 40 CFR 60, Appendix A, Method 24 or other EPA approved test method;
    - iii. Material Safety and Data Sheets provided by the material supplier; or

- iv. Another method on a material case-by-case basis as approved by the Director.
2. The hourly emission rates of VOC and HAPs shall be calculated by the following, or appropriate similar, method:

$H_{VOC} = \sum_{i=1}^n \frac{A_i \times B_i}{C}$ $H_{HAP} = \sum_{i=1}^n \frac{A_i \times B_i \times D_i}{C}$	<p><math>H_{VOC}</math> is the hourly VOC emission rate (pph)  <math>H_{HAP}</math> is the hourly HAP (by constituent) emission rate (pph)  A is the amount of material used during the month (gallons)  B is the VOC content of the material (lb/gallon)  C is the hours of operation for the source(s) during the month (hours)  D is the weight fraction of HAP (by constituent) present in the material  n is the number of materials used</p>
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3. The rolling continuous twelve (12) month total emission rates of VOC and HAPs shall be calculated by the following, or appropriate similar, method:

$Y_{VOC} = \sum_{i=1, j=1}^{n, 12} \frac{A_{i,j} \times B_i}{2000}$ $Y_{HAP} = \sum_{i=1, j=1}^{n, 12} \frac{A_{i,j} \times B_i \times D_i}{2000}$	<p><math>Y_{VOC}</math> is the hourly VOC emission rate (pph)  <math>Y_{HAP}</math> is the hourly HAP (by constituent) emission rate (pph)  A is the amount of material used during the month (gallons)  B is the VOC content of the material (lb/gallon)  C is the hours of operation for the source(s) during the month (hours)  D is the weight fraction of HAP (by constituent) present in the material  n is the number of materials used</p>
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All records shall be retained on-site by the permittee for a period of no less than five (5) years. Certified copies of these records shall be made available to the Director or his duly authorized representative upon request.

- 4.4.5 For the purpose of demonstrating compliance with the propane usage limits set forth in Section 4.1.9, the permittee shall maintain records of propane usage on a monthly and rolling continuous twelve (12) month total basis utilizing forms attached as Appendix C or forms similar containing the information requested.

## 4.5. Reporting Requirements

N/A - See Facility-Wide Reporting Requirements, Section 3.5.

**APPENDIX A - Monthly Material Usage Report (Sign Line 1, Sign Line 2, Sign Line 3, Sign Inline, Decal Line 1, Decal Inline, and Vutek Printers)**

Month, Year: \_\_\_\_\_

Hours of Operation: \_\_\_\_\_

Material Name, Manufacturer, ID No.	Amount Used (gallons)	VOC Content (lb VOC/gal)	Glycol Ethers Content	HAP _____ Content	HAP _____ Content	Total HAP Content

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## APPENDIX B - Monthly Material Usage Report (Small Format Digital Printing, In Line 1, and Clean Up Solvents)

Month, Year: \_\_\_\_\_

Flavor Card Line (PreCoater/Clear Coater)						
Hours of Operation: _____						
Material Name, Manufacturer, ID No.	Amount Used (gallons)	VOC Content (lb VOC/gal)	Glycol Ethers Content	HAP_____ Content	HAP_____ Content	Total HAP Content

<b>In Line 1</b>						
<b>Hours of Operation:</b> _____						
<b>Material Name, Manufacturer, ID No.</b>	<b>Amount Used (gallons)</b>	<b>VOC Content (lb VOC/gal)</b>	<b>Glycol Ethers Content</b>	<b>HAP _____ Content</b>	<b>HAP _____ Content</b>	<b>Total HAP Content</b>

<b>Clean Up Solvents</b>						
<b>Hours of Operation:</b> _____						
<b>Material Name, Manufacturer, ID No.</b>	<b>Amount Used (gallons)</b>	<b>VOC Content (lb VOC/gal)</b>	<b>Glycol Ethers Content</b>	<b>HAP _____ Content</b>	<b>HAP _____ Content</b>	<b>Total HAP Content</b>

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<b>Inca UV Printer</b>						
<b>Hours of Operation:</b> _____						
<b>Material Name, Manufacture, ID No.</b>	<b>Amount Used (gallons)</b>	<b>VOC Content (lb VOC/gal)</b>	<b>Glycol Ethers Content</b>	<b>HAP _____ Content</b>	<b>HAP _____ Content</b>	<b>Total HAP Content</b>



### Appendix C - Annual Propane Usage Report For Sign Line 1

Month, Year: \_\_\_\_\_

Month	Propane Usage (gallons/month)
January	
February	
March	
April	
May	
June	
July	
August	
September	
October	
November	
December	
Total	

## Appendix D - Monthly Emissions Report

Month, Year: \_\_\_\_\_

Emissions (pph)					
Source	VOC	Glycol Ethers	HAP _____	HAP _____	Total HAP
Sign Line 1 UV Emissions					
Sign Line 2 UV Emissions					
Sign Line 3 UV Emissions					
Sign Line 4 UV Emissions					
Sign Line 5 UV Emissions					
Decal Line 1 UV Emissions					
Decal Line 2 UV Emissions					
Decal Line 3 UV Emissions					

Rolling continuous twelve (12) month total VOC emissions: \_\_\_\_\_ tpy

Rolling continuous twelve (12) month total Glycol Ether emissions: \_\_\_\_\_ tpy

Rolling continuous twelve (12) month total HAP \_\_\_\_\_ emissions: \_\_\_\_\_ tpy

Rolling continuous twelve (12) month total HAP \_\_\_\_\_ emissions: \_\_\_\_\_ tpy

Rolling continuous twelve (12) month total THAP emissions: \_\_\_\_\_ tpy

Emissions (pph)					
Source	VOC	Glycol Ethers	HAP _____	HAP _____	Total HAP
Flavor Card Line					

Rolling continuous twelve (12) month total VOC emissions: \_\_\_\_\_tpy  
Rolling continuous twelve (12) month total Glycol Ether emissions: \_\_\_\_\_tpy  
Rolling continuous twelve (12) month total HAP \_\_\_\_\_ emissions: \_\_\_\_\_tpy  
Rolling continuous twelve (12) month total HAP \_\_\_\_\_ emissions: \_\_\_\_\_tpy  
Rolling continuous twelve (12) month total THAP emissions: \_\_\_\_\_tpy

Emissions (pph)					
Source	VOC	Glycol Ethers	HAP _____	HAP _____	Total HAP
Cleaning Solvents					

Rolling continuous twelve (12) month total VOC emissions: \_\_\_\_\_tpy  
Rolling continuous twelve (12) month total Glycol Ether emissions: \_\_\_\_\_tpy  
Rolling continuous twelve (12) month total HAP \_\_\_\_\_ emissions: \_\_\_\_\_tpy  
Rolling continuous twelve (12) month total HAP \_\_\_\_\_ emissions: \_\_\_\_\_tpy  
Rolling continuous twelve (12) month total THAP emissions: \_\_\_\_\_tpy

Emissions (pph)					
Source	VOC	Glycol Ethers	HAP _____	HAP _____	Total HAP
In Line 1					

Rolling continuous twelve (12) month total VOC emissions: \_\_\_\_\_tpy  
Rolling continuous twelve (12) month total Glycol Ether emissions: \_\_\_\_\_tpy  
Rolling continuous twelve (12) month total HAP \_\_\_\_\_ emissions: \_\_\_\_\_tpy  
Rolling continuous twelve (12) month total HAP \_\_\_\_\_ emissions: \_\_\_\_\_tpy  
Rolling continuous twelve (12) month total THAP emissions: \_\_\_\_\_tpy

Emissions (pph)					
Source	VOC	Glycol Ethers	HAP _____	HAP _____	Total HAP
Inca Printer					

Rolling continuous twelve (12) month total VOC emissions: \_\_\_\_\_tpy  
Rolling continuous twelve (12) month total Glycol Ether emissions: \_\_\_\_\_tpy  
Rolling continuous twelve (12) month total HAP \_\_\_\_\_ emissions: \_\_\_\_\_tpy  
Rolling continuous twelve (12) month total HAP \_\_\_\_\_ emissions: \_\_\_\_\_tpy  
Rolling continuous twelve (12) month total THAP emissions: \_\_\_\_\_tpy

### CERTIFICATION OF DATA ACCURACY

I, the undersigned, hereby certify that, based on information and belief formed after reasonable inquiry, all information contained in the attached \_\_\_\_\_, representing the period beginning \_\_\_\_\_ and ending \_\_\_\_\_, and any supporting documents appended hereto, is true, accurate, and complete.

Signature<sup>1</sup> \_\_\_\_\_  
(please use blue ink) Responsible Official or Authorized Representative Date \_\_\_\_\_

Name and Title \_\_\_\_\_  
(please print or type)

Telephone No. \_\_\_\_\_

Fax No. \_\_\_\_\_

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<sup>1</sup> This form shall be signed by a "Responsible Official." "Responsible Official" means one of the following:

- a. For a corporation: The president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit and either:
  - (I) the facilities employ more than 250 persons or have a gross annual sales or expenditures exceeding \$25 million (in second quarter 1980 dollars), or
  - (ii) the delegation of authority to such representative is approved in advance by the Director;
- b. For a partnership or sole proprietorship: a general partner or the proprietor, respectively;
- c. For a municipality, State, Federal, or other public entity: either a principal executive officer or ranking elected official. For the purposes of this part, a principal executive officer of a Federal agency includes the chief executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., a Regional Administrator of USEPA); or
- d. The designated representative delegated with such authority and approved in advance by the Director.