# West Virginia Department of Environmental Protection Division of Air Quality

# **Fact Sheet**



# For Final Minor Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to this Minor Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on February 2, 2017.

Permit Number: **R30-00300042-2017**Application Received: **January 9, 2017**Plant Identification Number: **03-54-003-00042** 

Permittee: **Quad/Graphics, Inc.**Facility Name: **Martinsburg Plant** 

Mailing Address: 855 Caperton Boulevard; Martinsburg, WV 25401

Permit Action Number: MM01 Revised: April 18, 2017

Physical Location: Martinsburg, Berkeley County, West Virginia

UTM Coordinates: 247.0 km Easting • 4,377.0 km Northing • Zone 18

Directions: I-81 to Exit 16 (Route 9 West) to County Route 1. Turn right into

Cumbo Yard Industrial Park.

#### **Facility Description**

Quad/Graphics (Quad) is a commercial printing business permitted for 18 rotogravure presses, 21 carbon adsorbers, 6 natural gas/propane fueled boilers, 3 hard chromium electroplating tanks and scrubbers, 15 solvent/ink storage tanks, 12 offset lithographic presses with catalytic oxidizers or regenerative thermal oxidizers, 1 cylinder cleaning unit, finishing/inkjet production, and an ink blend operation involving 11 storage tanks, 7 mixing tanks, and 3 totes. Not all of the permitted equipment has been installed. Quad/Graphics has installed 11 rotogravure presses, 13 carbon adsorbers, 4 natural gas/propane fueled boilers, 2 hard chromium electroplating tanks, 14 solvent/ink storage tanks, 5 offset lithographic presses (4 with thermal oxidizers and 1 with a catalytic oxidizer), 1 cylinder cleaning unit, finishing/inkjet production, and an ink blend operation consisting of 11 storage tanks, 7 mixing tanks, and 3 totes. Quad/Graphics' Standard Industrial Classification (SIC) Codes are 2752, 2754, and 2893 and the corresponding North American Industry Classification System (NAICS) codes are 323111 and 325910.

The purpose of this modification is to change the size and model of one (1) previously permitted (but not constructed) heatset offset lithographic printing press (OP-09).

#### **Emissions Summary**

The following Potential to Emit (PTE) changes are associated with this modification:

Pollutant	Change in PTE
	tons/year
СО	-1.90
$NO_X$	-2.68
PM <sub>2.5</sub> /PM <sub>10</sub> /PM	-0.18
$\mathrm{SO}_2$	-0.03
VOCs	-4.19
HAPs	1.03

### Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 103.84 TPY of NOx, 1,360.60 TPY of VOC, and 1,183.53 TPY of Toluene. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, over 10 tons per year of a single HAP, and over 25 tons per year of aggregate HAPs, Quad/Graphics, Inc. is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

#### **Legal and Factual Basis for Permit Conditions**

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

The modification to this facility has been found to be subject to the following applicable rules:

Federal and State: 45CSR13 NSR Permitting.

45CSR30 Operating permit requirement.

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

#### **Active Permits/Consent Orders**

Permit or	Date of	Permit Determinations or Amendments That
Consent Order Number	Issuance	Affect the Permit (if any)
R14-0012H	2/14/2017	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table," which may be downloaded from DAQ's website.

#### **Determinations and Justifications**

The following changes were made with this modification:

- The type and parameters of press OP-09 in the Emission Units Table and condition 5.1.1. were updated.
- Condition 5.1.7 was updated to reflect the current language in R14-0012H. References to OP-09 were removed.
- Condition 5.1.11 was removed since the referenced condition in R14-0012 was removed. The
  maximum VOC/HAP material percentages were obsolete and no longer needed under the actual
  emissions reporting and compliance demonstration methodology of the permit. It is important to note
  that these maximum concentrations were not part of the Best Available Control Technology (BACT)
  selection made under R14-0012B.
- Condition 5.4.1 was slightly revised to reflect current language in R14-0012H.
- The per-press combustion emissions in Appendix B were revised based on new LPG AP-42 emission factors.

#### **Non-Applicability Determinations**

The following requirements have been determined not to be applicable to the subject facility due to the following:

40 CFR 63, Subpart KK—National Emission Standards for the Printing and Publishing Industry: The printing and publishing Maximum Achievable Control Technology (MACT) standards, published on May 30, 1996, and amended on May 24, 2006, impose control requirements on publication and product/packaging rotogravure presses and web-wide flexographic presses. It does not apply to heatset web offset lithographic printing presses.

# **Request for Variances or Alternatives**

None.

#### **Insignificant Activities**

Insignificant emission unit(s) and activities are identified in the Title V application.

## **Comment Period**

Beginning Date: N/A
Ending Date: N/A

#### **Point of Contact**

All written comments should be addressed to the following individual and office:

Rex Compston, P.E.
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

Phone: 304/926-0499 ext. 1209 • Fax: 304/926-0478

Rex.E.Compston@wv.gov

## **Procedure for Requesting Public Hearing**

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

# **Response to Comments (Statement of Basis)**

Not applicable.