

West Virginia Department of Environmental Protection  
*Division of Air Quality*

Joe Manchin III  
Governor

Stephanie R. Timmermeyer  
Cabinet Secretary

# Permit to Operate



*Pursuant to*  
**Title V**  
*of the Clean Air Act*

*Issued to:*  
**Quebecor World Martinsburg**  
R30-00300018-2006

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*John A. Benedict*  
*Director*

*Issued: September 19, 2006 • Effective: October 3, 2006*

*Expiration: September 19, 2011 • Renewal Application Due: March 19, 2011*

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Permit Number: **R30-00300018-2006**  
Permittee: **Quebecor World Martinsburg**  
Facility Name: **Martinsburg**  
Mailing Address: **871 Baker Road, Martinsburg, WV 25401**

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*This permit is issued in accordance with the West Virginia Air Pollution Control Act (West Virginia Code §§ 22-5-1 et seq.) and 45CSR30 — Requirements for Operating Permits. The permittee identified at the above-referenced facility is authorized to operate the stationary sources of air pollutants identified herein in accordance with all terms and conditions of this permit.*

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Facility Location:	Martinsburg, Berkeley County, West Virginia
Mailing Address:	871 Baker Road, Martinsburg, WV 25401
Telephone Number:	304-267-3600
Type of Business Entity:	Corporation
Facility Description:	Printing and assembly of hard and soft cover books utilizing web offset heatset lithographic technology.
SIC Codes:	2752 PRINTING, PUBLISHING AND ALLIED INDUSTRIES - COMMERCIAL PRINTING LITHOGRAPH
UTM Coordinates:	250.0 Easting • 4,366.5 Northing • Zone 18

*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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*Issuance of this Title V Operating Permit does not supersede or invalidate any existing permits under 45CSR13, 14 or 19, although all applicable requirements from such permits governing the facility's operation and compliance have been incorporated into the Title V Operating Permit.*

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## Table of Contents

<b>1.0</b>	<b>Emission Units .....</b>	<b>4</b>
<b>2.0</b>	<b>General Conditions.....</b>	<b>5</b>
2.1.	Definitions .....	5
2.2.	Acronyms.....	5
2.3.	Permit Expiration and Renewal .....	6
2.4.	Permit Actions .....	6
2.5.	Reopening for Cause.....	6
2.6.	Administrative Permit Amendments .....	7
2.7.	Minor Permit Modifications .....	7
2.8.	Significant Permit Modification.....	7
2.9.	Emissions Trading .....	7
2.10.	Off-Permit Changes .....	7
2.11.	Operational Flexibility .....	8
2.12.	Reasonably Anticipated Operating Scenarios .....	9
2.13.	Duty to Comply.....	9
2.14.	Inspection and Entry .....	9
2.15.	Schedule of Compliance .....	10
2.16.	Need to Halt or Reduce Activity not a Defense .....	10
2.17.	Emergency .....	10
2.18.	Federally-Enforceable Requirements.....	11
2.19.	Duty to Provide Information.....	11
2.20.	Duty to Supplement and Correct Information.....	11
2.21.	Permit Shield .....	11
2.22.	Credible Evidence.....	12
2.23.	Severability .....	12
2.24.	Property Rights .....	12
2.25.	Acid Deposition Control.....	12
<b>3.0</b>	<b>Facility-Wide Requirements .....</b>	<b>14</b>
3.1.	Limitations and Standards.....	14
3.2.	Monitoring Requirements .....	17
3.3.	Testing Requirements .....	18
3.4.	Recordkeeping Requirements .....	19
3.5.	Reporting Requirements .....	20
3.6.	Compliance Plan .....	22
3.7.	Permit Shield .....	22
<b>4.0</b>	<b>Source-Specific Requirements [Press Dryers].....</b>	<b>24</b>
4.1.	Limitations and Standards.....	24
4.2.	Monitoring Requirements .....	25
4.3.	Testing Requirements .....	26
4.4.	Recordkeeping Requirements .....	26
4.5.	Reporting Requirements .....	26
4.6.	Compliance Plan .....	26

**5.0 Source-Specific Requirements [Gather-Bind-Trim Machines] ..... 27**

- 5.1. Limitations and Standards.....27
- 5.2. Monitoring Requirements .....27
- 5.3. Testing Requirements .....27
- 5.4. Recordkeeping Requirements .....27
- 5.5. Reporting Requirements .....27
- 5.6. Compliance Plan .....27

**1.0 Emission Units**

<b>Emission Unit ID</b>	<b>Emission Point ID</b>	<b>Emission Unit Description</b>	<b>Year Installed</b>	<b>Design Capacity</b>	<b>Control Device</b>
1S	1E	Press 1 Dryer	1989	3.0 MM Btu/hr	
2S	2E	Press 2 Dryer	1989	3.0 MM Btu/hr	
3S	3E	Press 3 Dryer	1989	3.0 MM Btu/hr	
4S	4E	Press 4 Dryer	1989	4.0 MM Btu/hr	
5S	5E	Press 5 Dryer	1989	4.0 MM Btu/hr	
6S	6E	Press 6 Dryer	2001	2.6 MM Btu/hr	
7S	7E	Press 7 Dryer	2001	2.4 MM Btu/hr	
13S	13E	Press 8 Dryer	2003	2.6 MM Btu/hr	
8S	8E	Gather Binder Trim 1	1989	15,000 books/hr	
9S	9E	Gather Binder Trim 2	1989	15,000 books/hr	
10S	10E	Gather Binder Trim 3	1989	15,000 books/hr	
11S	11E	Gather Binder Trim 4	2000	15,000 books/hr	
Baler A	Not Applicable <sup>(1)</sup>	Scrap paper collection and baling units	1989	13,200 lb/hr	Cyclone A
Baler B	Not Applicable <sup>(1)</sup>	Scrap paper collection and baling units	1989	6,500 lb/hr	Cyclone B
Baler C	Not Applicable <sup>(1)</sup>	Scrap paper collection and baling units	1989	6,500 lb/hr	Cyclone C

*(1) Balers A, B, and C effectively vent to the air handling system inside the plant building under normal operating conditions.*

## 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 (45CSR§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>CAAA</b>	Clean Air Act Amendments	<b>NSPS</b>	New Source
<b>CBI</b>	Confidential Business Information		Performance Standards
<b>CEM</b>	Continuous Emission Monitor	<b>PM</b>	Particulate Matter
<b>CES</b>	Certified Emission Statement	<b>PM<sub>10</sub></b>	Particulate Matter less than 10µm in diameter
<b>C.F.R. or CFR</b>	Code of Federal Regulations		
<b>CO</b>	Carbon Monoxide	<b>pph</b>	Pounds per Hour
<b>C.S.R. or CSR</b>	Codes of State Rules	<b>ppm</b>	Parts per Million
<b>DAQ</b>	Division of Air Quality	<b>PSD</b>	Prevention of Significant Deterioration
<b>DEP</b>	Department of Environmental Protection	<b>psi</b>	Pounds per Square Inch
<b>FOIA</b>	Freedom of Information Act	<b>SIC</b>	Standard Industrial Classification
<b>HAP</b>	Hazardous Air Pollutant		
<b>HON</b>	Hazardous Organic NESHAP	<b>SIP</b>	State Implementation Plan
<b>HP</b>	Horsepower		
<b>lbs/hr or lb/hr</b>	Pounds per Hour	<b>SO<sub>2</sub></b>	Sulfur Dioxide
<b>LDAR</b>	Leak Detection and Repair	<b>TAP</b>	Toxic Air Pollutant
<b>M</b>	Thousand	<b>TPY</b>	Tons per Year
<b>MACT</b>	Maximum Achievable Control Technology	<b>TRS</b>	Total Reduced Sulfur
		<b>TSP</b>	Total Suspended Particulate
<b>MM</b>	Million		
<b>MMBtu/hr or mmbtu/hr</b>	Million British Thermal Units per Hour	<b>USEPA</b>	United States Environmental Protection Agency
<b>MMCF/hr or mmcf/hr</b>	Million Cubic Feet Burned per Hour	<b>UTM</b>	Universal Transverse Mercator
<b>NA</b>	Not Applicable		
<b>NAAQS</b>	National Ambient Air Quality Standards	<b>VEE</b>	Visual Emissions Evaluation
<b>NESHAPS</b>	National Emissions Standards for Hazardous Air Pollutants	<b>VOC</b>	Volatile Organic Compounds
<b>NO<sub>x</sub></b>	Nitrogen Oxides		

### **2.3. Permit Expiration and Renewal**

- 2.3.1. Permit duration. This permit is issued for a fixed term of five (5) years and shall expire on the date specified on the cover of this permit, except as provided in 45CSR§30-6.3.b. and 45CSR§30-6.3.c.  
**[45CSR§30-5.1.b.]**
- 2.3.2. A permit renewal application is timely if it is submitted at least six (6) months prior to the date of permit expiration.  
**[45CSR§30-4.1.a.3.]**
- 2.3.3. Permit expiration terminates the source's right to operate unless a timely and complete renewal application has been submitted consistent with 45CSR§30-6.2. and 45CSR§30-4.1.a.3.  
**[45CSR§30-6.3.b.]**
- 2.3.4. If the Secretary fails to take final action to deny or approve a timely and complete permit application before the end of the term of the previous permit, the permit shall not expire until the renewal permit has been issued or denied, and any permit shield granted for the permit shall continue in effect during that time.  
**[45CSR§30-6.3.c.]**

### **2.4. Permit Actions**

- 2.4.1. This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.  
**[45CSR§30-5.1.f.3.]**

### **2.5. Reopening for Cause**

- 2.5.1. This permit shall be reopened and revised under any of the following circumstances:
- a. Additional applicable requirements under the Clean Air Act or the Secretary's legislative rules become applicable to a major source with a remaining permit term of three (3) or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to 45CSR§§30-6.6.a.1.A. or B.
  - b. Additional requirements (including excess emissions requirements) become applicable to an affected source under Title IV of the Clean Air Act (Acid Deposition Control) or other legislative rules of the Secretary. Upon approval by U.S. EPA, excess emissions offset plans shall be incorporated into the permit.
  - c. The Secretary or U.S. EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
  - d. The Secretary or U.S. EPA determines that the permit must be revised or revoked and reissued to assure compliance with the applicable requirements.

**[45CSR§30-6.6.a.]**

## **2.6. Administrative Permit Amendments**

- 2.6.1. The permittee may request an administrative permit amendment as defined in and according to the procedures specified in 45CSR§30-6.4.  
**[45CSR§30-6.4.]**

## **2.7. Minor Permit Modifications**

- 2.7.1. The permittee may request a minor permit modification as defined in and according to the procedures specified in 45CSR§30-6.5.a.  
**[45CSR§30-6.5.a.]**

## **2.8. Significant Permit Modification**

- 2.8.1. The permittee may request a significant permit modification, in accordance with 45CSR§30-6.5.b., for permit modifications that do not qualify for minor permit modifications or as administrative amendments.  
**[45CSR§30-6.5.b.]**

## **2.9. Emissions Trading**

- 2.9.1. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in the permit and that are in accordance with all applicable requirements.  
**[45CSR§30-5.1.h.]**

## **2.10. Off-Permit Changes**

- 2.10.1. Except as provided below, a facility may make any change in its operations or emissions that is not addressed nor prohibited in its permit and which is not considered to be construction nor modification under any rule promulgated by the Secretary without obtaining an amendment or modification of its permit. Such changes shall be subject to the following requirements and restrictions:
- a. The change must meet all applicable requirements and may not violate any existing permit term or condition.
  - b. The permittee must provide a written notice of the change to the Secretary and to U.S. EPA within two (2) business days following the date of the change. Such written notice shall describe each such change, including the date, any change in emissions, pollutants emitted, and any applicable requirement that would apply as a result of the change.
  - c. The change shall not qualify for the permit shield.
  - d. The permittee shall keep records describing all changes made at the source that result in emissions of regulated air pollutants, but not otherwise regulated under the permit, and the emissions resulting from those changes.
  - e. No permittee may make any change subject to any requirement under Title IV of the Clean Air Act (Acid Deposition Control) pursuant to the provisions of 45CSR§30-5.9.

- f. No permittee may make any changes which would require preconstruction review under any provision of Title I of the Clean Air Act (including 45CSR14 and 45CSR19) pursuant to the provisions of 45CSR§30-5.9.

**[45CSR§30-5.9.]**

## **2.11. Operational Flexibility**

- 2.11.1. The permittee may make changes within the facility as provided by § 502(b)(10) of the Clean Air Act. Such operational flexibility shall be provided in the permit in conformance with the permit application and applicable requirements. No such changes shall be a modification under any rule or any provision of Title I of the Clean Air Act (including 45CSR14 and 45CSR19) promulgated by the Secretary in accordance with Title I of the Clean Air Act and the change shall not result in a level of emissions exceeding the emissions allowable under the permit.

**[45CSR§30-5.8]**

- 2.11.2. Before making a change under 45CSR§30-5.8., the permittee shall provide advance written notice to the Secretary and to U.S. EPA, describing the change to be made, the date on which the change will occur, any changes in emissions, and any permit terms and conditions that are affected. The permittee shall thereafter maintain a copy of the notice with the permit, and the Secretary shall place a copy with the permit in the public file. The written notice shall be provided to the Secretary and U.S. EPA at least seven (7) days prior to the date that the change is to be made, except that this period may be shortened or eliminated as necessary for a change that must be implemented more quickly to address unanticipated conditions posing a significant health, safety, or environmental hazard. If less than seven (7) days notice is provided because of a need to respond more quickly to such unanticipated conditions, the permittee shall provide notice to the Secretary and U.S. EPA as soon as possible after learning of the need to make the change.

**[45CSR§30-5.8.a.]**

- 2.11.3. The permit shield shall not apply to changes made under 45CSR§30-5.8., except those provided for in 45CSR§30-5.8.d. However, the protection of the permit shield will continue to apply to operations and emissions that are not affected by the change, provided that the permittee complies with the terms and conditions of the permit applicable to such operations and emissions. The permit shield may be reinstated for emissions and operations affected by the change:

- a. If subsequent changes cause the facility's operations and emissions to revert to those authorized in the permit and the permittee resumes compliance with the terms and conditions of the permit, or
- b. If the permittee obtains final approval of a significant modification to the permit to incorporate the change in the permit.

**[45CSR§30-5.8.c.]**

- 2.11.4. "Section 502(b)(10) changes" are changes that contravene an express permit term. Such changes do not include changes that would violate applicable requirements or contravene enforceable permit terms and conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements.

**[45CSR§30-2.39]**

## **2.12. Reasonably Anticipated Operating Scenarios**

- 2.12.1. The following are terms and conditions for reasonably anticipated operating scenarios identified in this permit.
- a. Contemporaneously with making a change from one operating scenario to another, the permittee shall record in a log at the permitted facility a record of the scenario under which it is operating and to document the change in reports submitted pursuant to the terms of this permit and 45CSR30.
  - b. The permit shield shall extend to all terms and conditions under each such operating scenario; and
  - c. The terms and conditions of each such alternative scenario shall meet all applicable requirements and the requirements of 45CSR30.

[45CSR§30-5.1.i.]

## **2.13. Duty to Comply**

- 2.13.1. 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; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

[45CSR§30-5.1.f.1.]

## **2.14. Inspection and Entry**

- 2.14.1. 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.

[45CSR§30-5.3.b.]

## **2.15. Schedule of Compliance**

- 2.15.1. For sources subject to a compliance schedule, certified progress reports shall be submitted consistent with the applicable schedule of compliance set forth in this permit and 45CSR§30-4.3.h., but at least every six (6) months, and no greater than once a month, and shall include the following:
- a. Dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when such activities, milestones or compliance were achieved; and
  - b. An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measure adopted.

**[45CSR§30-5.3.d.]**

## **2.16. Need to Halt or Reduce Activity not a Defense**

- 2.16.1. It shall not be a defense for a permittee in an enforcement action that it would 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.

**[45CSR§30-5.1.f.2.]**

## **2.17. Emergency**

- 2.17.1. An "emergency" means any situation arising from sudden and reasonably 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.

**[45CSR§30-5.7.a.]**

- 2.17.2. 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 45CSR§30-5.7.c. are met.

**[45CSR§30-5.7.b.]**

- 2.17.3. 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. Subject to the requirements of 45CSR§30-5.1.c.3.C.1, 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, report, and variance request fulfills the requirement of 45CSR§30-5.1.c.3.B. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

[45CSR§30-5.7.c.]

- 2.17.4. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.

[45CSR§30-5.7.d.]

- 2.17.5. This provision is in addition to any emergency or upset provision contained in any applicable requirement.

[45CSR§30-5.7.e.]

## **2.18. Federally-Enforceable Requirements**

- 2.18.1. All terms and conditions in this permit, including any provisions designed to limit a source's potential to emit and excepting those provisions that are specifically designated in the permit as "State-enforceable only", are enforceable by the Secretary, USEPA, and citizens under the Clean Air Act.

[45CSR§30-5.2.a.]

- 2.18.2. Those provisions specifically designated in the permit as "State-enforceable only" shall become "Federally-enforceable" requirements upon SIP approval by the USEPA.

## **2.19. Duty to Provide Information**

- 2.19.1. 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 modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Secretary copies of records required 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.

[45CSR§30-5.1.f.5.]

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

- 2.20.1. 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.

[45CSR§30-4.2.]

## **2.21. Permit Shield**

- 2.21.1. Compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance provided that such applicable requirements are included and are specifically

identified in this permit or the Secretary has determined that other requirements specifically identified are not applicable to the source and this permit includes such a determination or a concise summary thereof.

**[45CSR§30-5.6.a.]**

2.21.2. Nothing in this permit shall alter or affect the following:

- a. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance; or
- b. The applicable requirements of the Code of West Virginia and Title IV of the Clean Air Act (Acid Deposition Control), consistent with § 408 (a) of the Clean Air Act.
- c. The authority of the Administrator of U.S. EPA to require information under § 114 of the Clean Air Act or to issue emergency orders under § 303 of the Clean Air Act.

**[45CSR§30-5.6.c.]**

## **2.22. Credible Evidence**

2.22.1. 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 defenses otherwise available to the permittee including but not limited to any challenge to the credible evidence rule in the context of any future proceeding.

**[45CSR§30-5.3.e.3.B. and 45CSR38]**

## **2.23. Severability**

2.23.1. The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any circumstance is held invalid by a court of competent jurisdiction, the remaining permit terms and conditions or their application to other circumstances shall remain in full force and effect.

**[45CSR§30-5.1.e.]**

## **2.24. Property Rights**

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

**[45CSR§30-5.1.f.4]**

## **2.25. Acid Deposition Control**

2.25.1. Emissions shall not exceed any allowances that the source lawfully holds under Title IV of the Clean Air Act (Acid Deposition Control) or rules of the Secretary promulgated thereunder.

- a. No permit revision shall be required for increases in emissions that are authorized by allowances acquired pursuant to the acid deposition control program, provided that such increases do not require a permit revision under any other applicable requirement.
- b. No limit shall be placed on the number of allowances held by the source. The source may not, however, use allowances as a defense to noncompliance with any other applicable requirement.

- c. Any such allowance shall be accounted for according to the procedures established in rules promulgated under Title IV of the Clean Air Act.

**[45CSR§30-5.1.d.]**

- 2.25.2. Where applicable requirements of the Clean Air Act are more stringent than any applicable requirement of regulations promulgated under Title IV of the Clean Air Act (Acid Deposition Control), both provisions shall be incorporated into the permit and shall be enforceable by the Secretary and U. S. EPA.

**[45CSR§30-5.1.a.2.]**

### 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 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). A copy of this notice is required to be sent to the USEPA, the Division of Waste Management and the Bureau for Public Health - Environmental Health.  
[40 C.F.R. 61 and 45CSR15]
- 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. **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 45CSR11.  
[45CSR§11-5.2]
- 3.1.6. **Emission inventory.** The permittee is responsible for submitting, on an annual basis, an emission inventory in accordance with the submittal requirements of the Division of Air Quality.  
[W.Va. Code § 22-5-4(a)(14)]
- 3.1.7. **Ozone-depleting substances.** For those facilities performing maintenance, service, repair or disposal of appliances, the permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 C.F.R. Part 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B:
- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the prohibitions and required practices pursuant to 40 C.F.R. §§ 82.154 and 82.156.
  - b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 C.F.R. § 82.158.

- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 C.F.R. § 82.161.

**[40 C.F.R. 82, Subpart F]**

- 3.1.8. **Risk Management Plan.** Should this stationary source, as defined in 40 C.F.R. § 68.3, become subject to Part 68, then the owner or operator shall submit a risk management plan (RMP) by the date specified in 40 C.F.R. § 68.10 and shall certify compliance with the requirements of Part 68 as part of the annual compliance certification as required by 40 C.F.R. Part 70 or 71.

**[40 C.F.R. 68]**

- 3.1.9. Maximum total monthly and annual usage of ink, fountain solution, blanket wash, roller cleaner, water-based glue, and hot melt adhesive shall not exceed the following monthly and annual limits:

<b>Material</b>	<b>Monthly Usage Rate</b>	<b>Annual Usage Rate</b>
Ink	9,852 gal/month	118,215 gal/year
Fountain Solution	1,466 gal/month	17,590 gal/year
Blanket Wash	762 gal/month	9,143 gal/year
Roller Cleaner	143 gal/month	1,714 gal/year
Water-based Glue	20,834 gal/month	250,000 gal/year
Hot Melt Adhesive	139.9 tons/month	1,679.3 tons/year

Note: Annual usage rates are based on given maximum hourly usage rates and 8,760 hours of operation per year. Monthly usage rates are determined by dividing maximum annual usages by 12.

Compliance with such limits shall be determined by using a rolling yearly total. A rolling yearly total shall mean the sum of material consumed at any given time for the previous twelve (12) consecutive calendar months.

**[45CSR13, R13-1156D, A.2., and 45CSR§30-12.7.]**

- 3.1.10. The permittee may use different materials than those listed in permit applications R13-1156, R13-1156A, R13-1156B, R13-1156C, and R13-1156D with proper notification, and upon prior written approval from the Director.

**[45CSR13, R13-1156D, A.3.]**

- 3.1.11. The facility-wide emission rate of the following HAPs shall not equal or exceed, on a per-HAP basis, 9.4 tons per year:

HAP	CAS Number
Vinyl Acetate	108054

Use of any ink, solvent, or adhesive containing any constituent identified in Section 112(b) of the 1990 Clean Air Act Amendments as a HAP and not listed above shall be in accordance with the following:

- a. The permittee shall notify the Director in writing of the material to be used and the HAP(s) contained therein within thirty (30) days after the initial use of the material. Additionally, an MSDS sheet for the material shall be supplied at this time to the Director.
- b. The use of the material shall be incorporated into the record keeping requirements of this permit.
- c. The emission rate of the HAP(s) contained within the material shall not equal or exceed the maximum permitted HAPs emission rate as established in 3.1.11. Compliance with the annual emission limits shall be determined using rolling yearly totals.

At any time in which additional HAPs are included in the facility emissions, the facility-wide emission rate of the total HAPs shall not equal or exceed 24.4 tons per year.

**[45CSR13, R13-1156D, A.5.]**

- 3.1.12. VOC emissions associated with the application of blanket wash and roller cleaners shall not exceed the following hourly and annual limits:

Material	VOC Emissions	
	lb/hr	ton/yr
Blanket Wash	6.92	30.31
Roller Cleaner	1.24	5.45

**[45CSR13, R13-1156D, A.1., and 45CSR§30-12.7.]**

- 3.1.13. No person shall cause, suffer, allow, or permit emissions of smoke and/or particulate matter into the open air from any process source operation which is greater than twenty (20) percent opacity.

**[45CSR§7-3.1., and 45CSR13, R13-1156D, B.3. and B.4.]**

- 3.1.14. The provisions of 45CSR§7-3.1. shall not apply to smoke and/or particulate matter emitted from any process source operation which is less than forty (40) percent opacity for any period or periods aggregating no more than five (5) minutes in any sixty (60) minute period.

**[45CSR§7-3.2., and 45CSR13, R13-1156D, B.3. and B.4.]**

3.1.15. No person shall cause, suffer, allow, or permit any manufacturing process or storage structure generating fugitive particulate matter to operate that is not equipped with a system, which may include, but not be limited to, process equipment design, control equipment design or operation and maintenance procedures, to minimize the emissions of fugitive particulate matter. To minimize means such system shall be installed, maintained and operated to ensure the lowest fugitive particulate matter emissions reasonably achievable.

**[45CSR§7-5.1., and 45CSR13, R13-1156D, B.3. and B.4.]**

3.1.16. The owner or operator of a plant shall maintain particulate matter control of the plant premises, and plant owned, leased or controlled access roads, by paving, application of asphalt, chemical dust suppressants or other suitable dust control measures. Good operating practices shall be implemented and when necessary particulate matter suppressants shall be applied in relation to stockpiling and general material handling to minimize particulate matter generation and atmospheric entrainment.

**[45CSR§7-5.2., and 45CSR13, R13-1156D, B.3. and B.4.]**

### **3.2. Monitoring Requirements**

3.2.1. For the purpose of demonstrating compliance with 3.1.9., 3.1.10. 3.1.12., 4.1.1., 4.1.2., and 5.1.1., the permittee shall conduct the following:

a. The permittee shall maintain records of the following:

- i. The name, type and volume (in gallons) of each material (e.g., ink, fountain solution, blanket wash, roller cleaner, adhesives, etc.) as applied on a monthly basis. For solid (hot melt) adhesives, the name and amount (in pounds) on a monthly basis.
- ii. The mass of VOC, and speciated HAPs for each material as applied on a monthly basis.

Additionally, within fifteen (15) days of the last day of each month, the permittee shall certify a summary report that contains the following information: hourly, monthly, and rolling 12-month emission rates VOCs, and aggregate and speciated HAPs from the application of materials and hours of operation of application of materials at the facility.

b. The following formulas shall be used to determine the quantities specified in section 3.2.1.a. above:

- i. The mass of VOCs, and speciated HAPs of each material shall be determined by one of the following methods:
  1. Certified product data sheets provided by the material supplier,
  2. 40 CFR 60, Appendix A, Method 24.
  3. Other EPA approved method.
- ii. The mass of VOCs, and speciated HAPs of each material as applied, on a monthly basis, shall be calculated using the following formula:

$$\text{Mass}_{(\text{pounds of VOCs, or HAPs/month})} = A * B$$

Where: A = monthly material usages in gallons per month (or lbs/month for solid

adhesives)

B = VOCs, or speciated HAPs of the materials used in pounds per gallon (or pounds per pound solid adhesive) as determined under paragraph (i) above

iii. The annual, monthly, and hourly emission rates of VOCs and aggregate and speciated HAPs shall be calculated in the following manner:

1. The annual emission rate of VOCs and aggregate and speciated HAPs shall be calculated as the sum of the monthly emission rates of VOCs and aggregate and speciated HAPs, respectively, from the previous twelve (12) months.
2. The monthly emission rate of VOCs and aggregate and speciated HAPs shall be calculated as the mass of VOCs and aggregate and speciated HAPs (as calculated above in paragraph 3.2.1.b.ii.), as applied, for the specified month.
3. The hourly emission rates of VOCs and aggregate and speciated HAPs shall be calculated, on a monthly basis, using the following formula:

$$\text{Emission rate}_{(\text{pounds of VOCs, HAPs/Hour})} = C/D$$

Where: C = Mass<sub>(pounds of VOCs, or HAPs/Month)</sub>

D = Monthly hours of printing operations

The CERTIFICATION OF DATA ACCURACY, shall appear on the reverse side said records and must be completed by a "Responsible Official" within fifteen (15) days after the end of each calendar month.

**[45CSR13, R13-1156D, B.1.]**

- 3.2.2. At least monthly, visual emission observations of each emission point subject to an opacity limit shall be conducted. An observation shall be performed within six (6) weeks of the previous observation. An observation must be made at least once per calendar month. An observation shall consist of observing all applicable emission points during the same day. For the purpose of these checks, excess visible emissions are to include visible fugitive dust emissions that leave the plant site boundaries. These checks shall be conducted during periods of normal facility operation for a sufficient time interval to determine if the unit has visible emissions using procedures outlined in 40 CFR 60, Appendix A, Method 22. If sources of visible emissions are identified during the survey, or at any other time, the permittee shall conduct a 45CSR7A evaluation within 24 hours. A 45CSR7A evaluation shall not be required if the visible emission condition is corrected and the units are operated at normal operating conditions within the above mentioned 24 hour period. A record of each visible emission check required above shall be maintained on site for a period of no less than five (5) years. Said record shall include, but not be limited to, the date, time, name of emission unit, the applicable visible emissions requirement, the results of the check, what action(s), if any, was/were taken, and the name of the observer.

**[45CSR§30-5.1.c.]**

### **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, if applicable, in accordance with the Secretary's delegated authority and any established equivalency determination methods which are 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.
- 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) and 45CSR13]

### 3.4. Recordkeeping Requirements

- 3.4.1. **Monitoring information.** 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.

[45CSR§30-5.1.c.2.A.]

- 3.4.2. **Retention of records.** The permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of monitoring sample, measurement, report, application, or record creation date. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Where appropriate, records may be maintained in computerized form in lieu of the above records.

[45CSR§30-5.1.c.2.B.]

- 3.4.3. **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§30-5.1.c. 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.

[45CSR§§30-4.4. and 5.1.c.3.D.]

- 3.5.2. A permittee may request confidential treatment for the submission of reporting required under 45CSR§30-5.1.c.3. pursuant to the limitations and procedures of W.Va. Code § 22-5-10 and 45CSR31.

[45CSR§30-5.1.c.3.E.]

- 3.5.3. 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, mailed first class or by private carrier 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 57<sup>th</sup> Street SE  
Charleston, WV 25304  
  
Phone: 304/926-0475  
FAX: 304/926-0478

**If to the US EPA:**

Associate Director  
Office of Enforcement and Permits Review  
(3AP12)  
U. S. Environmental Protection Agency  
Region III  
1650 Arch Street  
Philadelphia, PA 19103-2029

- 3.5.4. **Certified emissions statement.** The permittee shall submit a certified emissions statement and pay fees on an annual basis in accordance with the submittal requirements of the Division of Air Quality.

[45CSR§30-8.]

3.5.5. **Compliance certification.** The permittee shall certify compliance with the conditions of this permit on the forms provided by the DAQ. In addition to the annual compliance certification, the permittee may be required to submit certifications more frequently under an applicable requirement of this permit. The annual certification shall be submitted to the DAQ and USEPA on or before March 15 of each year, and shall certify compliance for the period ending December 31. The permittee shall maintain a copy of the certification on site for five (5) years from submittal of the certification.

[45CSR§30-5.3.e.]

3.5.6. **Semi-annual monitoring reports.** The permittee shall submit reports of any required monitoring on or before September 15 for the reporting period January 1 to June 30 and on or before March 15 for the reporting period July 1 to December 31. All instances of deviation from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official consistent with 45CSR§30-4.4.

[45CSR§30-5.1.c.3.A.]

3.5.7. **Emergencies.** For reporting emergency situations, refer to Section 2.17 of this permit.

3.5.8. **Deviations.**

a. In addition to monitoring reports required by this permit, the permittee shall promptly submit supplemental reports and notices in accordance with the following:

1. Any deviation resulting from an emergency or upset condition, as defined in 45CSR§30-5.7., shall be reported by telephone or telefax within one (1) working day of the date on which the permittee becomes aware of the deviation, if the permittee desires to assert the affirmative defense in accordance with 45CSR§30-5.7. A written report of such deviation, which shall include the probable cause of such deviations, and any corrective actions or preventative measures taken, shall be submitted and certified by a responsible official within ten (10) days of the deviation.
2. Any deviation that poses an imminent and substantial danger to public health, safety, or the environment shall be reported to the Secretary immediately by telephone or telefax. A written report of such deviation, which shall include the probable cause of such deviation, and any corrective actions or preventative measures taken, shall be submitted by the responsible official within ten (10) days of the deviation.
3. Deviations for which more frequent reporting is required under this permit shall be reported on the more frequent basis.
4. All reports of deviations shall identify the probable cause of the deviation and any corrective actions or preventative measures taken.

[45CSR§30-5.1.c.3.C.]

b. The permittee shall, in the reporting of deviations from permit requirements, including those attributable to upset conditions as defined in this permit, report the probable cause of such deviations and any corrective actions or preventive measures taken in accordance with any rules of the Secretary.

[45CSR§30-5.1.c.3.B.]

- 3.5.9. **New applicable requirements.** If any applicable requirement is promulgated during the term of this permit, the permittee will meet such requirements on a timely basis, or in accordance with a more detailed schedule if required by the applicable requirement.

[45CSR§30-4.3.h.1.B.]

### 3.6. Compliance Plan

- 3.6.1. No compliance plan was submitted since the permittee certified compliance with all applicable requirements.

### 3.7. Permit Shield

- 3.7.1. The permittee is hereby granted a permit shield in accordance with 45CSR§30-5.6. The permit shield applies provided the permittee operates in accordance with the information contained within this permit.

- 3.7.2. The following requirements specifically identified are not applicable to the source based on the determinations set forth below. The permit shield shall apply to the following requirements provided the conditions of the determinations are met.

- a. **45CSR2 - To Prevent and Control Particulate Air Pollution from Combustion of Fuel in Indirect Heat Exchangers.** The combustion units (i.e., dryers) utilized at this facility are considered direct heat transfer devices and their individual maximum design heat inputs are less than 10 MM Btu/hr, thus, 45CSR2 does not apply.
- b. **45CSR10 - To Prevent and Control Air Pollution from the Emission of Sulfur Oxides.** Each of the combustion units utilized at this facility each have a maximum design heat input under ten (10) million BTU's per hour and thus, are exempted from the requirements of sections three (3) through eight (8) as specified in section nine (9) of 45CSR10. Additionally, the dryers use direct heat transfer for the purpose of drying the ink to the substrate.
- c. **45CSR21 - To Prevent and Control Air Pollution from the Emission of Volatile Organic Compounds.** Quebecor World Martinsburg is located in Berkeley County, which is not one of the counties listed for which this regulation is applicable.
- d. **45CSR27 - To Prevent and Control the Emissions of Toxic Air Pollutants.** The facility is not subject to this rule. Vinyl Acetate is a VOC-HAP component of the water based glue used in the book binding operations, however is not listed as a toxic air pollutant under 45CSR27.
- e. **40 C.F.R. 60, Subpart QQ - Standards of Performance for the Graphic Arts Industry: Publication Rotogravure Printing.** Quebecor World Martinsburg does not utilize rotogravure printing presses as defined in this subpart. The subpart states in §60.430(a) that this subpart only applies to each publication rotogravure printing press. Therefore, this subpart does not apply to the permittee's facility.
- f. **40 C.F.R. 60, Subpart FFF - Standards of Performance for Flexible Vinyl and Urethane Coating and Printing.** Quebecor World Martinsburg is not involved in the printing or coating of vinyl or urethane products via rotogravure printing lines for which this subpart is applicable. Quebecor World Martinsburg is not a major source of HAPs and utilizes lithographic printing operations, in which the printing image is created and maintained chemically by creating different ink and water receptive areas on the roller.
- g. **40 C.F.R. 63, Subpart KK - National Emission Standards for the Printing and Publishing Industry.** Quebecor World Martinsburg does not utilize rotogravure (printing image is engraved below surface of cylinder) or flexographic (printing image is raised above the surface of cylinder) printing operations for

which this subpart is applicable. Quebecor World Martinsburg is not a major source of HAPs and utilizes lithographic printing operations, in which the printing image is created and maintained chemically by creating different ink and water receptive areas on the roller.

- h. **40 C.F.R. 64 – Compliance Assurance Monitoring.** The facility does not have a pollutant specific emissions unit with a control device in order to achieve compliance with an applicable standard or limit. Therefore, the facility is not subject to the Compliance Assurance Monitoring (CAM) rule.
- i. **CAA, Section 129 – Solid Waste Combustion.** The facility does not combust solid waste; therefore, this section is not applicable to the facility.
- j. **CAA, Section 183(e) – Federal Ozone Measures (Control of Emissions from Certain Sources).** The facility is not a regulated entity as defined in Section 183(e)(1)(C).
- k. **CAA, Section 183(f) – Federal Ozone Measures (Tank Vessel Standards).** The facility does not utilize tank vessels as defined in this section.
- l. **CAA, Title IV – Acid Deposition Control** – The facility is not an electric generating utility; therefore, title IV does not apply to the facility.
- m. **CAA, Title VI – Stratospheric Ozone Protection** – The facility does not emit any of the pollutants listed in Section 602; therefore, title VI does not apply to the facility.

**4.0 Source-Specific Requirements [Press Dryers, Emission Point ID(s): 1E, 2E, 3E, 4E, 5E, 6E, 7E, 13E]**

**4.1. Limitations and Standards**

4.1.1. The maximum hourly emissions from the printing presses shall not exceed the following limits:

Pollutant	Hourly Emissions (lb/hr)							
	1E	2E	3E	4E	5E	6E	7E	13E
CO	0.250	0.250	0.250	0.330	0.330	0.220	0.200	0.210
NO <sub>x</sub>	0.460	0.460	0.460	0.610	0.610	0.290	0.370	0.400
PM <sup>(1)</sup>	0.022	0.022	0.022	0.030	0.030	0.020	0.018	0.019
SO <sub>2</sub>	0.032	0.032	0.032	0.042	0.042	0.020	0.025	0.027
VOC	5.42	5.42	4.77	7.27	9.26	4.77	2.73	5.41

(1) The hourly emission limits on each of the presses for particulate matter are more stringent than those allowed by 45CSR§7-4.1. Therefore compliance with these streamlined limits assures compliance with 45CSR7.

**[45CSR13, R13-1156D, A.1.; 45CSR§7-4.1.; and 45CSR§30-12.7.]**

4.1.2. The maximum annual emissions from the printing presses shall not exceed the following limits:

Pollutant	Annual Emissions (tons/yr)							
	1E	2E	3E	4E	5E	6E	7E	13E
CO	1.10	1.10	1.10	1.45	1.45	0.96	0.87	0.92
NO <sub>x</sub>	2.01	2.01	2.01	2.68	2.68	1.27	1.61	1.75
PM	0.10	0.10	0.10	0.13	0.13	0.09	0.08	0.08
SO <sub>2</sub>	0.14	0.14	0.14	0.18	0.18	0.09	0.11	0.12
VOC <sup>(1)</sup>	23.73	23.73	20.89	31.76	40.54	20.88	11.95	23.72

(1) VOC emissions associated with the application of ink and fountain solution are vented to atmosphere through each respective press stack, and are included in the emission limits above.

**[45CSR13, R13-1156D, A.1., and 45CSR§30-12.7.]**

4.1.3. The permittee shall utilize only natural gas or LPG (propane) as fuel for the press dryers. Only one fuel shall be in use at any one time. The dryers are to be operated in such a manner as to not exceed their maximum design heat input. Total combined design heat input is not to exceed 215,601 MM Btu/yr. The maximum natural gas and/or propane use on a 30-day rolling average shall not exceed the following:

Emission Unit ID	Natural Gas Usage <sup>(1)</sup>			Propane Usage <sup>(2)</sup>		
	(ft <sup>3</sup> /hr)	(MM ft <sup>3</sup> /month)	(MM ft <sup>3</sup> /yr) <sup>(3)</sup>	(gal/hr)	(gal/month)	(gal/yr) <sup>(3)</sup>
1S	2,852	2.08	24.98	32.79	23,934.2	287,210
2S	2,852	2.08	24.98	32.79	23,934.2	287,210
3S	2,852	2.08	24.98	32.79	23,934.2	287,210
4S	3,802	2.78	33.31	43.72	31,912.5	382,950
5S	3,802	2.78	33.31	43.72	31,912.5	382,950
6S	2,490	1.82	21.82	20.60	15,038.0	180,456
7S	2,281	1.67	19.98	13.12	9,574.2	114,890
13S	2,463	1.80	21.58	28.33	20,679.3	248,152
<b>Total -</b>	<b>23,394.0</b>	<b>17.08</b>	<b>204.94</b>	<b>247.9</b>	<b>180,919.0</b>	<b>2,171,028.0</b>

- (1) Based on 100% use of natural gas only.
- (2) Based on 100% use of LPG (propane) fuel only.
- (3) Annual fuel usage is based on maximum design heat input (total 215,601 MM Btu/yr for all eight presses), and 8,760 hours of operation per year. Monthly usage is maximum annual usage divided by 12.

Compliance with such limits shall be determined by using a rolling yearly total. A rolling yearly total shall mean the sum of fuel consumed at any given time for the previous twelve (12) consecutive calendar months.

**[45CSR13, R13-1156D, A.4., and 45CSR§30-12.7.]**

## 4.2. Monitoring Requirements

- 4.2.1. Compliance with the emissions limitations associated with the combustion of fuel for the printing presses set forth in 4.1.1., 4.1.2., and with fuel usage limitations set forth in 4.1.3., shall be demonstrated as follows:
  - a. The permittee shall demonstrate that natural gas or propane were utilized as the only fuels.
  - b. The permittee shall maintain records of fuel usage, fuel BTU content, and hours of operation of press unit dryers on a monthly basis.
  - c. Within fifteen (15) days of the last day of each month, the permittee shall certify a summary report that contains the following information: hourly, monthly, and rolling 12-month fuel usage and hours of operation of the press units at the facility.

**[45CSR13, R13-1156D, B.2., and 45CSR§30-5.1.c.]**

4.2.2. Refer to section 3.2.1. of this permit.

### **4.3. Testing Requirements**

4.3.1. Reserved.

### **4.4. Recordkeeping Requirements**

4.4.1. Refer to section 3.2.1. and 4.2.1. of this permit.

### **4.5. Reporting Requirements**

4.5.1. Reserved.

### **4.6. Compliance Plan**

4.6.1. No compliance plan was submitted since the permittee certified compliance with all applicable requirements.

**5.0 Source-Specific Requirements [Gather-Bind-Trim Machines, Emission Point ID(s): 8E, 9E, 10E, 11E]**

**5.1. Limitations and Standards**

5.1.1. Emissions from the application of water based glue and hot melt glue in the Gather-Bind-Trim machines shall not exceed the following:

Pollutant	Water Based Glue		Hot Melt Glue	
	lb/hr	ton/yr	lb/hr	ton/yr
CO	0.0	0.0	0.39	1.68
PM	0.0	0.0	0.39	1.68
VOC	1.83	8.03	0.39	1.68
VOC-HAP <sup>(1)</sup>	1.83	8.03	0.0	0.0

(1) VOC-HAP emissions are also listed as VOC emissions, but are not additive as VOCs.

[45CSR13, R13-1156D, A.1., and 45CSR§30-12.7.]

**5.2. Monitoring Requirements**

5.2.1. Refer to section 3.2.1. of this permit.

**5.3. Testing Requirements**

5.3.1. Reserved.

**5.4. Recordkeeping Requirements**

5.4.1. Refer to section 3.2.1. of this permit.

**5.5. Reporting Requirements**

5.5.1. Reserved.

**5.6. Compliance Plan**

5.6.1. No compliance plan was submitted since the permittee certified compliance with all applicable requirements.