

# Fact Sheet



## For Draft/Proposed Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-00300042-2012**  
Application Received: **November 15, 2011**  
Plant Identification Number: **003-00042**  
Permittee: **Quad/Graphics, Inc.**  
Facility Name: **Martinsburg Plant**  
Mailing Address: **855 Caperton Boulevard, Martinsburg, WV 25401**

*Revised: N/A*

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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.

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### 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, 3 offset lithographic presses (2 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) Code is 2752, 2754, and 2893 and the corresponding North American Industry Classification System (NAICS) code is 323110, 323114, and 325791.

## Emissions Summary

<b>Plantwide Emissions Summary [Tons per Year]</b>		
<b>Regulated Pollutants</b>	<b>Potential Emissions</b>	<b>2010 Actual Emissions</b>
Carbon Monoxide (CO)	94	7.66
Nitrogen Oxides (NO <sub>x</sub> )	112.1	8.43
Particulate Matter (PM <sub>10</sub> )	7.53	2.08
Total Particulate Matter (TSP)	7.53	2.08
Sulfur Dioxide (SO <sub>2</sub> )	2.87	0.24
Volatile Organic Compounds (VOC)	1385.05	118.67

*PM<sub>10</sub> is a component of TSP.*

<b>Hazardous Air Pollutants</b>	<b>Potential Emissions</b>	<b>2010 Actual Emissions</b>
Toluene	1142.62	116.37
Xylene	5.66	0.65
Ethyl Benzene	1.52	0.0062
Naphthalene	0.08	0
Methanol	0.02	0
Cumene	0.02	0.001
Other HAPs	0.55	1.66
Total HAPs	1050.46	118.69

*Some of the above HAPs may be counted as PM or VOCs.*

### Title V Program Applicability Basis

This facility has the potential to emit 1300.93 TPY of VOCs, 1058.49 TPY of Toluene, and 1065.33 TPY of total HAPs. 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 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.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR6 45CSR10 45CSR11 45CSR14 45CSR16  WV Code § 22-5-4 (a) (14)  45CSR30 45CSR34  40 C.F.R. 60, Subpart Dc  40 C.F.R. 61 40 C.F.R. 63, Subpart N 40 C.F.R. 63, Subpart KK 40 C.F.R. 63, Subpart DDDDD 40 C.F.R. 82, Subpart F	Open burning prohibited. Sulfur dioxide limits. Standby plans for emergency episodes. PSD. Standards of Performance for New Stationary Sources pursuant to 40 C.F.R. Part 60. The Secretary can request any pertinent information such as annual emission inventory reporting. Operating permit requirement. Emission Standards for Hazardous Air Pollutants Pursuant to 40 C.F.R. Part 63 Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units Asbestos inspection and removal Chromium Electroplating MACT Printing and Publishing MACT Process Heaters and Boilers MACT Ozone depleting substances
State Only:	45CSR4	No objectionable odors.

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 Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit ( <i>if any</i> )
R14-0012E	February 15, 2011	

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 (if new permit format)," which may be downloaded from DAQ's website.

## Determinations and Justifications

This permit has been updated from the previous Title V permitting action as follows:

- Removal of P-01, P-02, and P-03. These emission units have been removed from this facility. Therefore they are no longer included in the emission units table, and they are no longer included in section 9.0 of this permit.
- Removal of G-24, G-25, G-26, and G-27. Quad/Graphics has a company-wide numbering system, and presses with these emission unit ID numbers were installed at other facilities. Thus, these ID numbers will not be used at this facility. This change was previously made in R14-0012E.
- Additionally, there have been some minor formatting and permit boilerplate changes.

There have been no additional changes made to this facility.

**40 C.F.R. 63, Subpart DDDDD (Boiler MACT) Requirements for NG/LPG Fired Heaters [B-01, B-02, B-03, B-04, B-05, and B-09].** On February 21, 2011, EPA signed the final rule for the Boiler MACT. This rule was published in the Federal Register on March 21, 2011 which established the existing source compliance date as March 21, 2014 [ the new source compliance date was May 20, 2011). The Cleaver Brooks and Johnston Boiler Co. Boilers [B-01, B-02, B-03, B-04, B-05, and B-09] are NG/LPG-fired with maximum design heat inputs ranging from 52.061 to 65.78 MMBtu/hr. The 40 C.F.R. 63, Subpart DDDDD, “National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters,” placeholder language was included as Condition 8.1.9.

On May 18, 2011 EPA published a Federal Register final rule (76 FR 28662-28664) staying 40 CFR 63, Subpart DDDDD in its entirety along with an indefinite delay of its effective date. However, on January 9, 2012 the US District Court for the District of Columbia declared unlawful EPA’s May 18, 2011 stay and delay of the major source Boiler MACT (40 CFR 63, Subpart DDDDD) and new portions of CISWI (40 CFR 60, Subparts CCCC and DDDD). However, EPA has plans to finalize its reconsidered versions of these rules by Spring 2012, and replace these newly reinstated rules, including re-setting of reporting and compliance timelines. In a Jan. 18, 2012 letter to Senator Wyden of Oregon, EPA Administrator Jackson stated that using its enforcement discretion, EPA does not intend for the recent court decision to impact new or existing sources in the interim before the new rules are promulgated.

**Greenhouse Gas Tailoring Rule:** This is a renewal Title V Permit and there have been no changes that would have triggered a PSD permit. As such, there are no applicable GHG permitting requirements.

## Non-Applicability Determinations

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

40 C.F.R. 64 – “Compliance Assurance Monitoring.” This is the second permit renewal for this facility. At the time of the first renewal, a CAM applicability review was conducted, and CAM did not apply. No changes have been made at this facility since the first renewal that would require any additional CAM applicability determinations.

## 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: February 22, 2012  
Ending Date: March 23, 2012

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

Rex Compston, P.E.  
Title V Permit Writer  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304

**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.

**Point of Contact**

Rex Compston, P.E.  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
Phone: 304/926-0499 ext. 1209 • Fax: 304/926-0478

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

Not applicable.