

Fact Sheet



For Final Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-00300018-2011**
Application Received: **March 15, 2011**
Plant Identification Number: **03-054-003-00018**
Permittee: **QG Printing II Corp.**
Mailing Address: **871 Baker Road, Martinsburg, WV 25401**

Revised: September 27, 2011

Physical Location: Martinsburg, Berkeley County, West Virginia
UTM Coordinates: 250.0 km Easting • 4,366.5 km Northing • Zone 18
Directions: From Route 9, turn at the light towards the VA hospital. Take first right and go ½ mile and the facility is on the left.

Facility Description

Printing and assembly of hard and soft cover books utilizing web offset heatset lithographic technology. Web offset heatset lithography uses a planographic method for image creation. The image and non-image areas are essentially on the same plane of a thin metal plate and the distinction between them is maintained chemically. Quebecor uses solvents to periodically clean the press blankets and press rollers. The facility is characterized by SIC codes 2731, 2732, and 2752.

Emissions Summary

| Plantwide Emissions Summary [Tons per Year] | | |
|---|---------------------|-----------------------|
| Regulated Pollutants | Potential Emissions | 2010 Actual Emissions |
| Carbon Monoxide (CO) | 7.51 | 1.82 |
| Nitrogen Oxides (NO _x) | 10.25 | 2.1 |
| Lead (Pb) | N/A | N/A |

| | | |
|--|--------|-------|
| Particulate Matter (PM ₁₀) | N/A | N/A |
| Total Particulate Matter (TSP) | 2.21 | 0.063 |
| Sulfur Dioxide (SO ₂) | 0.70 | 0.013 |
| Volatile Organic Compounds (VOC) | 171.49 | 26.10 |

PM₁₀ is a component of TSP.

| Hazardous Air Pollutants | Potential Emissions | 2010 Actual Emissions |
|--------------------------|---------------------|-----------------------|
| Vinyl Acetate | 9.4 | 0.66 |

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

Title V Program Applicability Basis

This facility has the potential to emit 171.49 tons/year of volatile organic compounds. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, QG Printing II Corp. 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 45CSR7 45CSR11 45CSR13 WV Code § 22-5-4 (a) (14) | Open burning prohibited. Particulate Matter from manufacturing Standby plans for emergency episodes. |
| | 45CSR30 40 C.F.R. Part 61 40 C.F.R. Part 82, Subpart F | The Secretary can request any pertinent information such as annual emission inventory reporting. Operating permit requirement. Asbestos inspection and removal Ozone depleting substances |
| State Only: | 45CSR4 | No objectionable odors. |

Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the draft 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>) |
|--------------------------------|------------------|--|
| R13-1156F | 4/20/2011 | |

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 B", which may be downloaded from DAQ's website.

Determinations and Justifications

The following changes have been made to the most recent Title V permit.

- The Title V permit boilerplate has been revised such that a new Section 1.2 Table has been added which lists all the active R13, R14, and/or R19 permits and their date(s) of issuance. Also, the underlying authority for any conditions from the R13, R14, and/or R19 permits has been changed to cite the original permit number in the Title V permit. These changes will eliminate the need to go through the entire Title V permit to change the R13, R14, and/or R19 permit numbers each time an R13, R14, and/or R19 permit is modified. The only required change will be to the Section 1.2 Table.
- Region 3 has requested that all annual compliance certifications be submitted electronically (e-mail), so the permit templates have been updated in conditions 3.5.3. and 3.5.5.
- Permittee's official name has been changed from Quebecor World Martinsburg to QG Printing II Corp.

This Title V Renewal permit includes changes from minor modification (MM01) application which was received on February 2, 2011. This minor modification incorporates changes from R13-1156F. The changes are as follows:

- Emission unit IDs-1S, 2S, 8S, 9S, 10S, 11S, 13S have been removed from Emission Unit Table 1.0.
- Emission unit IDs- 21S, 22S, 23S, 24S, 25S have been added to Emission Unit Table 1.0.
- Since Emission Unit IDs- 8S, 9S, 10S and 11S are no longer permitted, Section 5 has been removed.
- Previous Title V permit section 4.0 has been revised to incorporate changes from R13-1156F.
- Requirements for three new coldset presses (21S, 22S, 23S), and two waterbased inkjet press (24S, 25S) have been added in new section 4.0.
- Since new conditions 4.1.4 and 4.1.5 covers the usage limits of Ink, Fountain Solution, Blanket Wash and Roller Cleaner, old condition 3.1.9 has been removed from this permit. Water-based Glue and Hot Melt Adhesive usage limit have been removed from this permit because the company has proposed to eliminate use of all VOC-containing glues from the process.
- Since new condition 4.1.3 covers the requirement in condition 3.1.12, condition 3.1.12 has been removed from the Title V permit.
- The citations for Conditions 3.1.13-3.1.16 have been revised because R13-1156F doesn't include these requirements, but they are still applicable. These are now numbered 3.1.9-3.1.12.
- Since VOC/HAP emission profile is different in R13-1156F than in R13-1156D, conditions 3.1.10, 3.1.11 and 3.2.1 are not included in Title V permit. Condition 4.2.2 has been removed and 4.4.1 has been revised because of these changes.
- Since fuel usage limits have been removed from R13-1156F, old conditions 4.1.3 (fuel usage limits) and 4.2.1 (monitoring requirements for fuel usage) have been removed from this permit.
- Conditions 4.1.9, 4.4.2 and 4.4.3 from R13-1156F are not added to Title V permit because these conditions are part of R13 boilerplate language and are for control devices. (R13-1156F, section 1.0 does not have any control devices).

Non-Applicability Determinations

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

Prevention of Significant Deterioration and Title V Greenhouse Gas Tailoring Rule.

The facility has not made any changes that trigger a PSD modification; therefore, the requirements of the GHG tailoring rule are non-applicable.

40 CFR 64-Compliance Assurance Monitoring. This is the second permit renewal for this facility. The facility was found not to be subject to CAM at the time of the first renewal. Therefore, a CAM determination is not required.

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: August 11, 2011
Ending Date: September 12, 2011

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

Beena Modi
Title V Permit Writer
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th 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

Beena Modi
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1228 • Fax: 304/926-0478

Response to Comments (Statement of Basis)

None