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West Virginia Department of Environmental Protection

Bob Wise
Governor

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Secretary

WEST VIRGINIA TITLE V PERMIT TO OPERATE

THIS PERMIT IS ISSUED IN ACCORDANCE WITH THE WEST VIRGINIA AIR POLLUTION CONTROL ACT (W.VA. CODE §§ 22-5-1 ET SEQ.) AND 45 C.S.R. 30 - "REQUIREMENTS FOR OPERATING PERMITS." THE PERMITTEE IDENTIFIED AT THE FACILITY BELOW IS AUTHORIZED TO OPERATE THE STATIONARY SOURCES OF AIR POLLUTANTS IDENTIFIED HEREIN IN ACCORDANCE WITH ALL TERMS AND CONDITIONS OF THIS PERMIT.

PERMITTEE: Quebecor World Martinsburg
FACILITY/LOCATION: Martinsburg, WV
PERMIT NUMBER: R30-00300018-1996

JOHN A. BENEDICT
DEPUTY DIRECTOR, DIVISION OF AIR QUALITY

July 25, 2001
DATE ISSUED

August 15, 2006
EXPIRATION DATE

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 twenty-two-b of the Code of West Virginia. W. Va. Code §22-5-14.

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"To use all available resources to protect and restore West Virginia's



West Virginia
Department of
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Protection

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SECTION I. FACILITY INFORMATION

A. PERMIT DATES

Date of Issue: July 25, 2001
Effective Date: August 15, 2001
Expiration Date: August 15, 2006
Renewal Application Due: February 15, ~~2001~~ 2006

B. FACILITY CONTACT INFORMATION

Responsible Official: ~~Steve Carpenter~~ Kevin Kelley, Vice-President/General Manager
Telephone Number: (304) 267-3620
Fax Number: (304) 267-9625
Environmental Contact: Jane Dobrzanski, Maintenance Engineering Manager
Telephone Number: (304) 267-3664
Fax Number: (304) 267-0989

C. FACILITY INFORMATION

Name of Permittee: Quebecor World Martinsburg
Mailing Address: 871 Baker Road
Martinsburg, WV 25401
Name of Facility: Quebecor World Martinsburg
Mailing Address: 871 Baker Road
Martinsburg, WV 25401
Telephone Number: (304) 267-3600
Type of Business Entity: Corporation
Facility Description: Printing and production of hard and soft cover books utilizing web offset heatset lithography technology.
Nearest City or Town: Martinsburg, WV
County: Berkeley
UTM Coordinates: ZONE:18
EASTING: 250 km NORTHING: 4,366.5 km
Directions: From Route 9 off I-81, turn at the ~~flashing~~ light towards the VA Hospital. Turn at 1st right, go ½ mile and the plant is on the left.

D. SIC CODES

Primary: 2752
Secondary: N/A
Tertiary: N/A

SECTION II. GENERAL CONDITIONS

This Section describes the general conditions applicable to all emission units at a Title V source. Conditions and requirements specific to this source are contained in Section III of the permit.

A. BACKGROUND

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 22-5-17.
2. The Clean Air Act means those provisions contained in 42 U.S.C. §§ 7401 to 7671q, and regulations promulgated thereunder.
3. "C.S.R." or "CSR" means the West Virginia Code of State Rules.
4. In some instances, provisions of 45 C.S.R. 30 have been paraphrased for clarity in specific application to this permit. However, any such paraphrasing is in no way intended to modify the meaning of any provision of 45 C.S.R. 30 or any other rule.
5. All citations to 45 C.S.R. 30 refer to the version of the rule which became effective on July 1, 2001.
6. The General Conditions in Section II of this permit may be modified by written administrative notice by the Secretary to the permittee to conform to amendments to 45 C.S.R. 30 approved by USEPA which may become effective during the term of this permit and which affect any of those General Conditions.
7. "Director" means the director of the division of environmental protection or such other person to whom the director has delegated authority or duties pursuant to W.Va. Code §§22-1-6 or 22-1-8 (C.S.R. § 45-30-2.12.), and shall have like meaning as the Secretary of the Department of Environmental Protection. The Director of the Division of Air Quality is the Secretary's designated representative for the purposes of this permit.
8. The permittee is not relieved of the requirements for obtaining a permit under 45 C.S.R. 13, 45 C.S.R. 14 and/or 45 C.S.R. 19 after the issuance of an operating permit under 45 C.S.R. 30. C.S.R. § 45-30-6.1.f.
9. The Secretary's authority to require standards under 40 C.F.R. 60 (NSPS), 40 C.F.R. 61 (NESHAPS), and 40 C.F.R. 63 (NESHAPS MACT) is provided in West Virginia Code §§ 22-5-1 et seq., 45 C.S.R. 16, 45 C.S.R. 15, 45 C.S.R. 34 and 45 C.S.R. 30.
10. 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. C.S.R. § 45-30-5.3.e.3.B.

11. This permit does not convey permission to treat, store, or dispose of any materials determined to be hazardous wastes as per 45 C.S.R. 25. Additionally, it does not relieve the permittee herein of the responsibility to apply for and obtain all other required permits, licenses, and/or approvals from the Division of Air Quality as well as other local, state, and federal agencies which may have jurisdiction over the construction and/or operation of the source(s) and/or facility herein permitted. WV Code §§ 22-5-1 et seq.
12. Issuance of a Title V permit does not supersede or invalidate any existing permits under 45 C.S.R. 13, 45 C.S.R. 14, or 45 C.S.R. 19, although all applicable requirements from such permits governing the facility's operation and compliance have been incorporated into the Title V permit.

B. REQUIREMENT FOR PERMIT C.S.R. § 45-30-3.1.

The following sources are subject to permitting requirements of 45 C.S.R. 30:

1. Any major source as defined by C.S.R. § 45-30-2.26.;
2. Any source, including an area source, subject to a standard or other requirements under § 111 of the Clean Air Act;
3. Any source, including an area source, subject to a standard or other requirements under § 112 of the Clean Air Act, except that a source is not required to obtain a permit solely because it is subject to regulations or requirements under § 112(r) of the Clean Air Act; and
4. Any affected source as defined by C.S.R. § 45-30-2.2. (Title IV Acid Rain)

C. PERMIT ISSUANCE C.S.R. § 45-30-6.1.a.

A permit, permit modification, or renewal may be issued only if all of the following conditions have been met:

1. The Secretary has received a complete application for a permit, permit modification, or permit renewal;
2. Except for modifications qualifying for minor permit modification procedures under C.S.R. § 45-30-6.5.a., the Secretary has complied with the public participation procedures for permit issuance in accordance with C.S.R. § 45-30-6.8.;
3. The Secretary has complied with the requirements for notifying and responding to

affected States in accordance with C.S.R. § 45-30-7.2.;

4. The conditions of the permit provide for compliance with all applicable requirements and the requirements of 45 C.S.R. 30; and
5. When appropriate, the Secretary will provide a copy of the permit and any notices required under C.S.R. §§ 45-30-7.1. and 7.2. to the USEPA, and USEPA has not timely objected to issuance of the permit under C.S.R. § 45-30-7.3.

D. PERMIT EXPIRATION AND RENEWAL C.S.R. §§ 45-30-6.3. and 4.1.a.3.

This permit expires at midnight on the expiration date, which is noted above and is five (5) years after the date of issuance. Expiration of this permit terminates the permittee's right to operate unless a timely and complete renewal application has been submitted in accordance with C.S.R. §§ 45-30-6.2. and 4.1.a.3. A timely application is one that is submitted at least six (6) months prior to the expiration of this permit. If the permittee submits a timely and complete application, the failure to have a Title V Operating Permit is not a violation of 45 C.S.R. 30 until the Secretary takes final action on the permit application. This protection shall cease to apply if, subsequent to the completeness determination, the permittee fails to submit by the deadline specified in writing by the Secretary any additional information identified as being required to process the application.

E. CERTIFIED EMISSIONS STATEMENT AND FEES C.S.R. § 45-30-8.

The permittee shall submit a certified emission statement and pay fees on an annual basis in accordance with the submittal requirements of the Division of Air Quality. A receipt for the appropriate fee shall be maintained on the premises for which the receipt has been issued, and shall be made immediately available for inspection by the Secretary or his/her duly authorized representative.

F. CHANGES REQUIRING PERMIT REVISION

1. **General.** C.S.R. § 45-30-5.1.f.3.

This permit and/or any part thereof 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.

2. **Permit Reopening.** C.S.R. § 45-30-6.6.a.

This permit shall be reopened and revised under any of the following circumstances:

- a. Additional applicable requirements under the Clean Air Act or legislative

rules adopted pursuant to West Virginia Code §§ 22-5-1, et seq. 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 C.S.R. § 45-30-6.6.a.1.A. or B.;

- b. Additional requirements become applicable to an affected source under Title IV of the Clean Air Act or other legislative rules adopted pursuant to West Virginia Code §§ 22-5-1, et seq.;
- c. The Secretary or Administrator of USEPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emission standards or other terms or conditions of the permit;
- d. The Secretary or Administrator of USEPA determines that the permit must be revised or revoked and reissued to assure compliance with the applicable requirements.

3. **Administrative Permit Amendments.** C.S.R. § 45-30-6.4.

Changes qualifying for administrative amendment procedure under C.S.R. § 45-30-6.4.a., may be made to this permit in accordance with the procedure enumerated in C.S.R. § 45-30-6.4.b. as follows:

- a. The Secretary shall take no more than sixty (60) days from receipt of a request for an administrative permit amendment to take final action on such request, and may incorporate such changes without providing notice to the public or affected states provided that the Secretary designates any such permit revisions as having been made pursuant to this section.
- b. The Secretary shall submit a copy of the revised permit to the USEPA.
- c. The source may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request.

4. **Permit Transfers.** C.S.R. § 45-30-6.4.a.4.

A change in ownership or operational control of the permitted source may utilize the procedures for administrative permit amendments if the following requirements are met:

- a. The Secretary determines no other changes in the permit are required.
- b. A written agreement containing the following information is submitted to the

Secretary:

- i. The specific date for transfer of permit responsibility;
 - ii. Coverage; and
 - iii. Liability between the current and the new permittee.
- c. The permittee shall transfer any existing permits under 45 C.S.R. 13, 45 C.S.R. 14, and 45 C.S.R. 19 simultaneously in accordance with the requirements under the applicable rule.

5. **Minor Permit Modifications.** C.S.R. § 45-30-6.5.a.

Changes meeting the criteria enumerated in C.S.R. § 45-30-6.5.a.1., may be effected through the minor permit modification procedure. Pursuant to the procedure, the permittee must file an application for the change meeting the requirements of C.S.R. § 45-30-4.3., including those items enumerated in C.S.R. § 45-30-6.5.a.2.

6. **Significant Permit Modifications.** C.S.R. § 45-30-6.5.b.

Changes at the facility that require a permit revision, and which either do not qualify for or are not otherwise processed as minor permit modifications or as administrative permit amendments shall meet all of the requirements of C.S.R. § 45-30-6., including the requirements for applications, public participation, review by affected states and review by USEPA as they apply to permit issuance and permit renewal. The Secretary shall complete the review process for significant permit modifications within six (6) months after receipt of a complete application.

G. CHANGES NOT REQUIRING PERMIT REVISION

1. **Emissions Trading.** C.S.R. § 45-30-5.1.h.

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.

2. **Off-Permit Changes.** C.S.R. § 45-30-5.9.

In addition to all insignificant emission units or activities which may be operated at this facility, the permittee is authorized to make changes in its operations or emissions that are not addressed nor prohibited in its permit and which are not considered to be construction, reconstruction nor modification under any rule promulgated by the Secretary within its facility without requiring a permit revision if:

- a. The change meets all applicable requirements and does not violate any existing permit term or condition;
- b. For changes in operation that result in, or have the potential to result in an increase in any regulated air pollutant, the permittee provides a written notice of the change to the Secretary and to USEPA within two (2) business days following the date of the change which includes:
 - i. A description of the change;
 - ii. The date on which the change will occur or has occurred;
 - iii. Any change in emissions;
 - iv. The pollutants emitted; and
 - v. Any applicable requirement that would apply as a result of the change.
- c. The permittee keeps records describing all changes that result in emissions of regulated air pollutants, but not otherwise regulated under this permit, and the emissions resulting from those changes;
- d. The change is not subject to any requirement under Title IV of the Clean Air Act (Acid Deposition Control);
- e. The change does not require preconstruction review under any provision of Title I of the Clean Air Act, (including 45 C.S.R. 14 and 45 C.S.R. 19);
- f. The off-permit change shall not qualify for a permit shield.

3. **Operational Flexibility.** C.S.R. § 45-30-5.8., C.S.R. § 45-30-2.39.

The permittee is authorized to make changes which qualify as Section 502(b)10 changes, and which are not modifications under any rule or provision of Title I of the Clean Air Act, and which do not result in a level of emissions exceeding the emissions allowable under the permit without a permit revision. Before making a change under this provision, the permittee shall provide advance notice to the Secretary and to USEPA, 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 attach a copy of the notice to this permit, and the Secretary shall place a copy in the public file. The written notice shall be provided to the Secretary and USEPA 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 USEPA as soon as possible after learning of the need to make the change. The permit shield provided under C.S.R. § 45-30-5.6. shall not apply to changes made to effect operational flexibility under C.S.R. § 45-30-5.8. C.S.R. § 45-30-5.8.a.

4. **Reasonably Anticipated Operating Scenarios.** C.S.R. § 45-30-5.1.i.

If the permittee has been granted the authority to make a change from one operating scenario to another, the terms and conditions of such reasonably anticipated operating scenarios appear in the Specific Requirements of this permit, and such terms and conditions meet all applicable requirements, the permittee may make those changes absent permit revision in accordance with those Specific Requirements, provided that:

- a. The source shall, contemporaneously with making a change from one operating scenario to another 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 the permit or otherwise required by 45 C.S.R. 30.
- b. In accordance with Section II.K. of this permit, the permit shield described in C.S.R. § 45-30-5.6. may extend to all terms and conditions under each such reasonable anticipated operating scenario set forth in the Specific Requirements of this permit.

H. PUBLIC PARTICIPATION

Except for permit revisions qualifying as administrative permit amendments or minor permit modification procedures, all permit proceedings, including initial permit issuance, significant modifications, permit reopenings and renewals, shall be subject to public participation requirements of C.S.R. §§ 45-30-6.8.a. through e.

I. COMPLIANCE AND ENFORCEMENT

1. **Duty to Comply.** C.S.R. § 45-30-5.1.f.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.

2. **Inspection and Entry.** C.S.R. § 45-30-5.3.b.

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.

3. **Certification of Compliance.** C.S.R. § 45-30-5.3.

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 enumerated in the Specific Requirements Section of this permit. The annual certification shall be submitted to the DAQ and USEPA on or before ~~February 28~~ March 15 of each year, and shall certify compliance for the period ending December 31.

4. **Schedule of Compliance.** C.S.R. § 45-30-5.3.c.

- a. For all applicable requirements with which the source is in compliance, the permittee shall continue to comply with such requirements. C.S.R. § 45-30-4.3.h.1.A.
- b. For applicable requirements that will become effective during the permit term, the permittee will meet those requirements on a timely basis, unless a more detailed schedule is expressly required by the applicable requirement. C. S. R. § 45-30-4.3.h.1.B
- c. For sources that are not in compliance with all applicable requirements at the time of permit issuance, the permittee must meet the requirements of the compliance schedule enumerated in the Specific Requirements Section of this permit and which incorporates all of the elements of C.S.R. § 45-30-4.3.h.1.C. For sources subject to such a compliance schedule, certified

progress reports shall be submitted according to the schedule set forth in the Specific Requirements Section of this permit, but at least every six (6) months, and no greater than once a month, and shall include the following:

- i. 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
- ii. 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.

5. **Need to Halt or Reduce Activity not a Defense.** C.S.R. § 45-30-5.1.f.2.

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.

6. **Federally-Enforceable Requirements.** C.S.R. § 45-30-5.2.a.

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.

7. **Duty to Provide Representative Information.** C.S.R. § 45-30-5.1.c.1.B.

Information compiled or utilized to determine compliance with emissions limitations and standards set forth in this permit shall fully comply with the testing, monitoring, recordkeeping and reporting provisions of this permit and shall be obtained under such conditions and at such times as necessary to assure that compliance is established for all periods of source operation represented by such testing, monitoring or recordkeeping and is based upon relevant averaging periods for each emissions limitation and standard.

J. SUBMISSION OF INFORMATION

1. **Certification.** C.S.R. § 45-30-4.4.

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.

2. **Duty to Provide Information.** C.S.R. § 45-30-5.1.f.5.

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 45 C.S.R. 31. 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. 2.

3. **Duty to Supplement and Correct Information.** C.S.R. § 45-30-4.2.

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 Director of DAQ such supplemental facts or corrected information.

4. **Recordkeeping.** C.S.R. § 45-30-5.1.c.2.A.

- a. In addition to the applicable recordkeeping requirements enumerated in the Specific Requirements Section of this permit, the permittee shall keep records of monitoring information that include the following:
 - i. The date, the specific units or equipment IDs subject to monitoring requirements under the Specific Requirements Section of this permit, and time of sampling or measurements;
 - ii. The date(s) analyses were performed;
 - iii. The company or entity that performed the analyses;
 - iv. The analytical techniques or methods used;
 - v. The results of the analyses; and
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. 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, or application. 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. C.S.R. § 45-30-5.1.c.2.B.

5. **Reporting.** C.S.R. § 45-30-5.1.c.3.

- a. In addition to the applicable reporting requirements enumerated in the Specific Requirements Section of this permit, the permittee shall submit reports of any required monitoring at least every six (6) months, but no more often than once per month. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official consistent with C.S.R. § 45-30-4.4. and submitted to the OAQ no later than fifteen (15) days following the close of that reporting period.
- b. With the submission of the annual compliance certification, the permittee shall report all deviations from permit requirements. These reports shall include those attributable to upset conditions as defined in the Specific Requirements Section of this permit, the probable cause of such deviations, and any corrective actions or preventative measures taken in accordance with any rules of the Secretary.

[NOTE: For reporting emergency situations refer to Section II.M.3. of this permit.]

- c. In addition to monitoring reports required by the permit, the permittee shall promptly submit supplemental reports and notices in accordance with the following:
 - i. Any deviation resulting from an emergency or upset condition, as defined in C.S.R. § 45-30-5.7., 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 C.S.R. § 45-30-5.7. 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. C.S.R. § 45-30-5.1.c.3.C.1.

[NOTE: For additional information regarding emergencies refer to Section II.M. of this permit.]

- ii. 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. C.S.R. § 45-30-5.1.c.3.C.2.

iii. Deviations for which more frequent reporting is required under the Specific Requirements Section of this permit shall be reported on the more frequent basis. C.S.R. § 45-30-5.1.c.3.C.3.

iv. All reports of deviations shall identify the probable cause of the deviation and any corrective actions or preventative measures taken. C.S.R. § 45-30-5.1.c.3.C.4.

d. A permittee may request confidential treatment for the submission of reporting required under C.S.R. § 45-30-5.1.c.3. pursuant to the limitations and procedures of W.Va. Code § 22-5-10 and 45 C.S.R. 31.

6. **Notice.** All notices, requests, demands, submissions and other communications required or permitted to be made to the Director of DAQ 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 Director of the Division of Air Quality may designate:

If to the DAQ:

Director	Telephone: (304) 926-3727
WV Department of Environmental Protection	Telefax: (304) 926-3739
Division of Air Quality	
7012 MacCorkle Ave., SE	
Charleston, West Virginia 25304-2943	

If to the USEPA:

Associate Secretary, Enforcement (3AP1200)
U.S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103

K. PERMIT SHIELD C.S.R. § 45-30-5.6.a.

1. Where granted in the Specific Requirements Section of this permit, the permit shield infers that compliance with the conditions of this permit shall be deemed compliance with the corresponding applicable requirement(s) as of the date of permit issuance.
2. A permit shield must be requested by the permittee.

3. This permit will not grant permit shields for the construction, modification or relocation of any source which was required to obtain a permit under 45 C.S.R. 13, 45 C.S.R. 14, or 45 C.S.R. 19 prior to the issuance of this permit, except to the extent that applicable requirements established pursuant to permits issued under those rules are contained herein.

L. SEVERABILITY C.S.R. § 45-30-5.1.e.

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.

M. EMERGENCY

1. **Emergency.** C.S.R. § 45-30-5.7.

- a. 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.
- b. In the event that a permittee believes that an emergency condition has caused a technology-based emission limit to be exceeded and wishes to assert the occurrence of an emergency as an affirmative defense, the permittee must demonstrate through completion and certification of relevant evidence that all of the following conditions applied to or during the excess emissions event or period:
 - i. An emergency occurred and that the permittee can identify the cause(s) of the emergency;
 - ii. The permitted facility was at the time being properly operated;
 - iii. 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
 - iv. The permittee submitted notice of the emergency to the Secretary by telephone or telefax within one (1) working day of the date on which the permittee became aware of the deviation and made a request for

variance as applicable rules provide. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

- c. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - d. This provision is in addition to any emergency or upset provision contained in any applicable requirement.
2. For those facilities asserting an affirmative defense in the case of an emergency episode as defined by C.S.R. § 45-30-5.7.a., the permittee shall be required to take all reasonable steps to minimize levels of emissions that exceeded the emissions standards, or other requirements for this permit. The permittee shall submit notice of the emergency to the Secretary by telephone or telefax within one (1) working day of the date on which the permittee becomes aware of the deviation and make a request for variance. The notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken. An emergency constitutes an affirmative defense to an action brought for noncompliance with the technology-based emission limitation if the conditions of C.S.R. § 45-30-5.7.c. are met.
 3. For those facilities asserting an affirmative defense, a written report of any deviation resulting from an emergency or upset condition, shall include the probable cause of such deviation, and any corrective actions or preventative measures taken, and shall be submitted and certified by a responsible official within ten (10) days of the deviation. C.S.R. § 45-30-5.1.c.3.C.1.

[NOTE: Refer to Section II.J.5.c.i. of this permit for additional information regarding emergencies.]

N. PROPERTY RIGHTS C.S.R. § 45-30-5.1.f.4.

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

O. ACCIDENTAL RELEASE PREVENTION REQUIREMENTS, §112(r) OF THE CLEAN AIR ACT

Should this stationary source, as defined in 40 CFR part 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 CFR part 68.10 and shall certify compliance with the requirements of part 68 as part of the annual compliance certification as required by 40 CFR part 70 or 71.

P. 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:

1. Persons opening appliances for maintenance, service, repair, or disposal must comply with the prohibitions and required practices pursuant to C.F.R. §§ 40-82.154 and 82.156.
2. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to C.F.R. §§ 40-82.158.
3. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to C.F.R. §§ 40-82.161.

Q. ADDITIONAL CONDITIONS C.S.R. § 45-30-5.6.c.

Nothing in this permit shall alter or affect the following:

1. The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the USEPA Administrator under that section;
2. 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;
3. The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act;
4. The ability of EPA to obtain information from a source pursuant to Section 114 of the Clean Air Act.
5. The applicable requirements of the Code of West Virginia.

SECTION III. SPECIFIC REQUIREMENTS

A. EMISSION POINTS AND POLLUTION CONTROL DEVICES

The following table provides a list of regulated sources of air pollutant emissions authorized to operate by this permit at the subject facility:

Source ID	Emission Point ID	Equipment Description
<i>Equipment With Applicable Requirements</i>		
1S	1E	Hantscho Model: Mark 16A Web-Offset Printing Unit. & Dryer Model: ASI-A1108SM. Ink is transferred to the paper web and is then dried by the forced air dryer, with fuel combustion products and volatiles generated being vented to atmosphere.
2S	2E	Hantscho Model: Mark 16A Web-Offset Printing Unit. & Dryer Model: ASI-A1108SM. Ink is transferred to the paper web and is then dried by the forced air dryer, with fuel combustion products and volatiles generated being vented to atmosphere.
3S	3E	Hantscho, Model: Mark 5A Web-Offset Printing Unit. & Dryer Model: ASI-A1108SM. Ink is transferred to the paper web and is then dried by the forced air dryer, with fuel combustion products and volatiles generated being vented to atmosphere.
4S	4E	Man Roland, Model: Octoman Web-Offset Printing Unit. & Dryer Model: ASI-1402RB. Ink is transferred to the paper web and is then dried by the forced air dryer, with fuel combustion products and volatiles generated being vented to atmosphere.
5S	5E	Man Roland, Model: Lithoman Web-Offset Printing Unit. & Dryer Model: ASI-1402RB. Ink is transferred to the paper web and is then dried by the forced air dryer, with fuel combustion products and volatiles generated being vented to atmosphere.
6S	6E	Harris M110B Press / Dryer Model: TEC Model 2C-10. Ink is transferred to the paper web and is then dried by the forced air dryer, with fuel combustion products and volatiles generated being vented to atmosphere.
7S	7E	Harris M110 Press / Dryer Model: TEC Model 2C-10. Ink is transferred to the paper web and is then dried by the forced air dryer, with fuel combustion products and volatiles generated being vented to atmosphere.
<u>13S</u>	<u>13E</u>	<u>Hantscho, Model: Mark 5A Web-Offset Printing Unit & Dryer Model: ASI-A1108SM. Ink is transferred to the paper web and then dried by the forced air dryer, with fuel combustion products and volatiles generated being vented to atmosphere.</u>
8S	8E	Book Assembly: Gather-Bind-Trim 1, using water based glue and a hot melt adhesive to bind the sections of the books together.

9S	9E	Book Assembly: Gather-Bind-Trim 2, using water based glue and a hot melt adhesive to bind the sections of the books together.
10S	10E	Book Assembly: Gather-Bind-Trim 3, using water based glue and a hot melt adhesive to bind the sections of the books together.
11S	N/A	Book Assembly: Gather-Bind-Trim 4, using water based glue and a hot melt adhesive to bind the sections of the books together. Vents to surrounding air inside building.
Baler A	11E (Cyclone A)	Waste Paper System: Balemaster, Model No. 4275G-8, 75 Hp. Waste paper from the shredder and floor sweeping/cleaning operations is fed to baling and air filter systems via a system of ducts, fans, and diverters.
Baler B	12E (Cyclone B)	Waste Paper System: Balemaster, Model No. 4030G-6, 30 Hp. Waste paper from the End Sheet Combiners and floor sweeping/cleaning operations is fed to baling and air filter systems via a system of ducts, fans, and diverters.
Baler C	12E (Cyclone C)	Waste Paper System: Balemaster, Model No. 4030G-6, 30 Hp. Waste paper from the Gather-Bind-Trim Machines and floor sweeping/cleaning operations is fed to baling and air filter systems via system of ducts, fans, and diverters.
<i>Control Equipment</i>		
Cyclone A	11E	Waste Paper System: 13 ft diameter cyclone; provides separation of paper waste following Baler A; can either be vented to atmosphere through (11E), or to Filter A for additional separation prior to being directed to the plant air handling system.
Filter A	N/A	Waste Paper System: Baghouse manufactured by Senneca Environmental, Model No. 304-IMRI10. Exit air is directed to the plant air handling system.
Cyclone B	12E	Waste Paper System: 9 ft diameter cyclone providing separation of paper waste from the air stream off Baler B; can be vented to Filter C, or diverted to atmosphere through emission point 12E.
Cyclone C	12E	Waste Paper System: 13 ft diameter cyclone; provides separation of paper waste from the air stream off Baler C; can be vented to Filter C, or diverted to atmosphere through emission point 12E.
Filter C	N/A	Waste Paper System: Baghouse manufactured by Senneca Environmental, Model No. 304-IMRI10. Exit air is directed to the plant air handling system.

B. ENFORCEABILITY OF APPLICABLE REQUIREMENTS

The following table provides a summary of all applicable requirements and their methods for determining compliance. For further detail refer to the sections referenced in the columns entitled “Permit Condition Number” and “Compliance Demonstration - Condition Number.”

Emission Point ID	Applicable Requirement	Permit Condition Number	Pollutant/ Parameter	Limit/ Standard	Compliance Demonstration	
					Method	Condition Number
Facility-Wide	C.S.R. § 45-4-3.1.	III.B.1.b.i.	Any Air Pollutant	Objectionable Odor Prohibited	Recordkeeping	III.C.5.
Facility-Wide	C.S.R. § 45-6-3.1.	III.B.1.a.i.	Refuse	Open Burning Prohibited	N/A	III.B.1.a.i.
Facility-Wide	C.S.R. § 45-6-3.2.	III.B.1.a.ii.	N/A	Open Burning Prohibited	N/A	III.B.1.a.ii.
Facility-Wide	C.S.R. § 45-7-3.1.	III.B.2.a.i.	Smoke and/or particulate matter	20% Opacity	Visual Inspection, Recordkeeping	III.C.1.
Facility-Wide	C.S.R. § 45-7-3.2.	III.B.2.a.ii.	Smoke and/or particulate matter	40% Opacity (exception period)	Visual Inspection, Recordkeeping	III.C.1.
Facility-Wide	C.S.R. § 45-7-3.7.	III.B.2.a.iii.	Smoke and/or Particulate Matter	Visible Emissions	Good Engineering Practices	III.C.1., III.C.4.
1E, 2E	C.S.R. § 45-7-4.1.	III.B.2.a.iv.	Particulate Matter	6.15 lb/hr, each	Visual Inspection & Recordkeeping	III.C.1., III.C.2.
3E	C.S.R. § 45-7-4.1.	III.B.2.a.iv.	Particulate Matter	5.36 lb/hr	Visual Inspection & Recordkeeping	III.C.1., III.C.2.
4E	C.S.R. § 45-7-4.1.	III.B.2.a.iv.	Particulate Matter	8.33 lb/hr	Visual Inspection & Recordkeeping	III.C.1., III.C.2.
5E, 6E	C.S.R. § 45-7-4.1.	III.B.2.a.iv.	Particulate Matter	10.38 lb/hr, each	Visual Inspection & Recordkeeping	III.C.1., III.C.2.
6E	C.S.R. § 45-7-4.1.	III.B.2.a.iv.	Particulate Matter	5.35 lb/hr	Visual Inspection & Recordkeeping	III.C.1., III.C.2.
7E	C.S.R. § 45-7-4.1.	III.B.2.a.iv.	Particulate Matter	3.45 lb/hr	Visual Inspection & Recordkeeping	III.C.1., III.C.2.
8E	C.S.R. § 45-7-4.1.	III.B.2.a.iv.	Particulate Matter	14.76 lb/hr	Visual Inspection & Recordkeeping	III.C.1., III.C.2.
9E	C.S.R. § 45-7-4.1.	III.B.2.a.iv.	Particulate Matter	14.76 lb/hr	Visual Inspection & Recordkeeping	III.C.1., III.C.2.

Emission Point ID	Applicable Requirement	Permit Condition Number	Pollutant/Parameter	Limit/Standard	Compliance Demonstration	
					Method	Condition Number
10E	C.S.R. § 45-7-4.1.	III.B.2.a.iv.	Particulate Matter	14.76 lb/hr	Visual Inspection & Recordkeeping	III.C.1., III.C.2.
11E	C.S.R. § 45-7-4.1.	III.B.2.a.iv.	Particulate Matter	11.92 lb/hr	Visual Inspection & Recordkeeping	III.C.1., III.C.2.
12E	C.S.R. § 45-7-4.1.	III.B.2.a.iv.	Particulate Matter	6.5 lb/hr	Visual Inspection & Recordkeeping	III.C.1., III.C.2.
Facility-wide	C.S.R. § 45-7-4.13.	III.B.2.a.v. <u>iv.</u>	Hazardous Particulate Matter	Consideration of Harmful Effects	N/A	III.B.2.a.v. <u>iv.</u>
Facility-wide	C.S.R. § 45-7-5.1.	III.B.1.a.iii	Particulate Matter	Minimize Fugitive Dust	N/A	III.B.1.a.iii
Facility-wide	C.S.R. § 45-7-5.2.	III.B.1.a.iv.	Particulate Matter	Minimize Fugitive Dust	N/A	III.B.1.a.iv.
Facility-wide	C.S.R. § 45-7-8.1.	III.B.1.a.v.	Particulate Matter Loading	Compliance Tests	Director's Authority	III.B.1.a.v.
Facility-wide	C.S.R. § 45-7-8.2.	III.B.1.a.vi.	Particulate Matter	Other Compliance Tests	Director's Authority	III.B.1.a.vi.
Facility-wide	C.S.R. § 45-7-9.1	III.B.1.a.vii.	Equipment Malfunction	Excess Emissions	Request for Exceedance	III.B.1.a.vii.
Facility-Wide	C.S.R. § 45-11-5.2.	III.B.1.a.viii.	Any Regulated Air Pollutant	Submit Standby Plan if Requested	N/A	III.B.1.a.viii
Facility-wide	C.S.R. § 45-13-6.1.	III.B.1.a.ix.	Testing	Compliance Tests	Director's Authority to Require	III.B.1.a.ix.
Facility-wide	C.S.R. § 45-13-10.2	III.B.1.a.x.	Permit Suspension	As Required by the Director	N/A	III.B.1.a.x.
Facility-wide	C.S.R. § 45-13-10.3	III.B.1.a.xi.	Permit Suspension	As Required by the Director	N/A	III.B.1.a.xi.
Facility-wide	<u>C.S.R. § 45-13 (Permit #: R13-1156D)</u>	<u>III.B.2.a.v.</u>	<u>Use of Different Materials</u>	<u>Prior Approval by Director</u>	<u>Notification</u>	<u>III.B.2.a.v.</u>
1E	C.S.R. § 45-13 (Permit #: R13-1156 <u>D</u>)	III.B.2.a.vi.; III.B.2.a.vii.	CO	0.066 0.25 lb/hr, 0.289 1.10 tpy	Recordkeeping	III.C.2
			NO _x	0.46 lb/hr, 2.01 tpy	Recordkeeping	III.C.2
			PM	0.038 0.022 lb/hr, 0.166 0.10 tpy	Visual Inspection & Recordkeeping	III.C.1., III.C.2
			SO ₂	0.034 0.032 lb/hr, 0.149 0.14 tpy	Recordkeeping	III.C.2

Emission Point ID	Applicable Requirement	Permit Condition Number	Pollutant/Parameter	Limit/Standard	Compliance Demonstration	
					Method	Condition Number
			VOC	5.42 lb/hr, 23.74 <u>23.73</u> tpy	Recordkeeping	III.C.2, III.C.3.
2E	C.S.R. § 45-13 (Permit #: R13-1156ED)	III.B.2.a.vi.; III.B.2.a.vii.	CO	0.066 <u>0.25</u> lb/hr, 0.289 <u>1.10</u> tpy	Recordkeeping	III.C.2
			NO _x	0.46 lb/hr, 2.01 tpy	Recordkeeping	III.C.2
			PM	0.038 <u>0.022</u> lb/hr, 0.166 <u>0.10</u> tpy	Visual Inspection & Recordkeeping	III.C.1., III.C.2
			SO ₂	0.034 <u>0.032</u> lb/hr, 0.149 <u>0.14</u> tpy	Recordkeeping	III.C.2
			VOC	5.42 lb/hr, 23.74 <u>23.73</u> tpy	Recordkeeping	III.C.2, III.C.3.
3E	C.S.R. § 45-13 (Permit #: R13-1156ED)	III.B.2.a.vi.; III.B.2.a.vii.	CO	0.066 <u>0.25</u> lb/hr, 0.289 <u>1.10</u> tpy	Recordkeeping	III.C.2.
			NO _x	0.46 lb/hr, 2.01 tpy	Recordkeeping	III.C.2.
			PM	0.038 <u>0.022</u> lb/hr, 0.166 <u>0.10</u> tpy	Visible Inspection & Recordkeeping	III.C.1., III.C.2.
			SO ₂	0.034 <u>0.032</u> lb/hr, 0.149 <u>0.14</u> tpy	Recordkeeping	III.C.2.
			VOC	4.77 <u>4.76</u> lb/hr; 20.89 <u>20.84</u> tpy	Recordkeeping	III.C.2., III.C.3.
4E	C.S.R. § 45-13 (Permit #: R13-1156ED)	III.B.2.a.vi.; III.B.2.a.vii.	CO	0.088 <u>0.33</u> lb/hr, 0.385 <u>1.45</u> tpy	Recordkeeping	III.C.2.
			NO _x	0.61 lb/hr; 2.67 tpy	Recordkeeping	III.C.2.
			PM	0.05 <u>0.03</u> lb/hr, 0.22 <u>0.13</u> tpy	Visible Inspection & Recordkeeping	III.C.1., III.C.2.
			SO ₂	0.046 <u>0.042</u> lb/hr, 0.201 <u>0.18</u> tpy	Recordkeeping	III.C.2.
			VOC	7.25 <u>7.27</u> lb/hr, 31.76 <u>31.85</u> tpy	Recordkeeping	III.C.2., III.C.3.
5E	C.S.R. § 45-13 (Permit #: R13-1156ED)	III.B.2.a.vi.; III.B.2.a.vii.	CO	0.088 <u>0.33</u> lb/hr, 0.385 <u>1.45</u> tpy	Recordkeeping	III.C.2.
			NO _x	0.61 lb/hr; 2.67 tpy	Recordkeeping	III.C.2.
			PM	0.05 <u>0.03</u> lb/hr, 0.22 <u>0.13</u> tpy	Visible Inspection & Recordkeeping	III.C.1., III.C.2.
			SO ₂	0.046 <u>0.042</u> lb/hr, 0.201 <u>0.18</u> tpy	Recordkeeping	III.C.2.
			VOC	9.26 <u>9.25</u> lb/hr, 40.56 <u>40.52</u> tpy	Recordkeeping	III.C.2., III.C.3.

Emission Point ID	Applicable Requirement	Permit Condition Number	Pollutant/Parameter	Limit/Standard	Compliance Demonstration	
					Method	Condition Number
6E	C.S.R. § 45-13 (Permit #: R13-1156ED)	III.B.2.a.vi.; III.B.2.a.vii.	CO	0.22 lb/hr, 0.94 <u>0.96</u> tpy	Recordkeeping	III.C.2.
			NO _x	0.29 lb/hr, 1.26 <u>1.27</u> tpy	Recordkeeping	III.C.2.
			PM	0.02 <u>0.019</u> lb/hr, 0.09 <u>0.08</u> tpy	Visible Inspection & Recordkeeping	III.C.1., III.C.2.
			SO ₂	0.02 lb/hr; 0.09 tpy	Recordkeeping	III.C.2.
			VOC	4.24 <u>4.75</u> lb/hr, 18.56 <u>20.82</u> tpy	Recordkeeping	III.C.2., III.C.3.
7E	C.S.R. § 45-13 (Permit #: R13-1156ED)	III.B.2.a.vi.; III.B.2.a.vii.	CO	0.025 <u>0.100</u> lb/hr, 0.110 <u>0.44</u> tpy	Recordkeeping	III.C.2.
			NO _x	0.184 <u>0.180</u> lb/hr, 0.806 <u>0.79</u> tpy	Recordkeeping	III.C.2.
			PM	0.014 <u>0.010</u> lb/hr, 0.061 <u>0.04</u> tpy	Visible Inspection & Recordkeeping	III.C.1., III.C.2.
			SO ₂	0.014 <u>0.013</u> lb/hr, 0.061 <u>0.06</u> tpy	Recordkeeping	III.C.2.
			VOC	2.71 <u>2.72</u> lb/hr, 11.85 <u>11.90</u> tpy	Recordkeeping	III.C.2., III.C.3.
13E	C.S.R. § 45-13 (Permit #: R13-1156D)	III.B.2.a.vi.; III.B.2.a.vii.	CO	<u>0.210</u> lb/hr, <u>0.92</u> tpy	Recordkeeping	III.C.2.
			NO _x	<u>0.400</u> lb/hr, <u>1.75</u> tpy	Recordkeeping	III.C.2.
			PM	<u>0.019</u> lb/hr, <u>0.08</u> tpy	Visible Inspection & Recordkeeping	III.C.1., III.C.2.
			SO ₂	<u>0.027</u> lb/hr, <u>0.12</u> tpy	Recordkeeping	III.C.2.
			VOC	<u>5.41</u> lb/hr, <u>23.71</u> tpy	Recordkeeping	III.C.2., III.C.3.
Facility-Wide	C.S.R. § 45-13 (Permit #: R13-1156ED)	III.B.2.a.viii.	VOC (Ink)	37.75 <u>182.99</u> tpy	Recordkeeping	III.C.3.
			VOC (Fountain Solution)	2.40 <u>11.03</u> tpy	Recordkeeping	III.C.3.
			VOC (Blanket Wash)	6.03 <u>6.92</u> lb/hr, 26.41 <u>30.31</u> tpy	Recordkeeping	III.C.3.
			VOC (Roller Cleaner)	1.08 <u>1.24</u> lb/hr, 4.73 <u>5.43</u> tpy	Recordkeeping	III.C.3.
8E, 9E, 10E (Water Based Glue)	C.S.R. § 45-13 (Permit #: R13-1156ED)	III.B.2.a.ix.	VOC-HAP	1.83 lb/hr; 8.02 <u>8.03</u> tpy (aggregated)	Recordkeeping	III.C.3.

Emission Point ID	Applicable Requirement	Permit Condition Number	Pollutant/Parameter	Limit/Standard	Compliance Demonstration	
					Method	Condition Number
8E, 9E, 10E (Hot Melt Adhesive)	C.S.R. § 45-13 (Permit #: R13-1156D)	III.B.2.a.ix.	CO	0.290 lb/hr; 1.26 tpy (aggregated)	Recordkeeping	III.C.3.
			PM	0.29 lb/hr; 1.26 tpy (aggregated)	Recordkeeping	III.C.3.
			VOC	0.29 lb/hr; 1.26 1.27 tpy (aggregated)	Recordkeeping	III.C.3.
Facility-Wide	<u>C.S.R. § 45-13 (Permit #: R13-1156D)</u>	<u>III.B.2.a.x.</u>	<u>HAPs</u>	<u>9.4 tpy for single HAP, 24.4 tpy for aggregated HAPs</u>	<u>Notification, Recordkeeping</u>	<u>III.C.3.</u>
Facility-Wide	C.S.R. § 45-13 (Permit #: R13-1156D)	III.E.1.	Ink Usage	8619.4 <u>9,852</u> gal/month; 116,158 <u>103,433.2</u> 118,215 gal/yr	Recordkeeping	III.C.3.
			Fountain Solution Usage	1272.5 <u>1,466</u> gal/month; 15,270 <u>17,590</u> gal/yr	Recordkeeping	III.C.3.
			Blanket Wash Usage	66.67 <u>762</u> gal/month; 8,000 <u>9,143</u> gal/yr	Recordkeeping	III.C.3.
			Roller Cleaner Usage	125 <u>143</u> gal/month; 1,500 <u>1,714</u> gal/yr	Recordkeeping	III.C.3.
			Water-based Glue Usage	20,834 gal/month; 250,000 gal/yr	Recordkeeping	III.C.3.
			Hot Melt Adhesive	105 tons/month; 1,259.5 tons/yr	Recordkeeping	III.C.3.
Facility-Wide	C.S.R. § 45-13 (Permit #: R13-1156C)	III.E.2.	VOC Content - Ink	3.14 lb/gal (36% wt.)	Testing; Recordkeeping	III.C.3.b.i.
			VOC Content - Fountain Solution	1.28 lb/gal (14.3% wt.)	Testing; Recordkeeping	III.C.3.b.i.
			VOC Content - Blanket Wash	6.63 lb/gal (99.4% wt.)	Testing; Recordkeeping	III.C.3.b.i.
			VOC Content - Roller Cleaner	6.36 lb/gal (99.5% wt.)	Testing; Recordkeeping	III.C.3.b.i.
			VOC/HAP Content - Water Based Glue	0.7% wt.	Testing; Recordkeeping	III.C.3.b.i.
			Natural Gas Usage	3,002 <u>ft³/hr;</u> 2.19 <u>MM ft³/month;</u> 26.3 <u>MM ft³/yr</u>	Recordkeeping	III.C.2.
1E through 13E	<u>C.S.R. § 45-13 (Permit #: R13-1156D)</u>	<u>III.E.2.</u>	<u>Design Heat Input</u>	<u>210,240 MMBtu/yr, combined</u>	<u>Recordkeeping</u>	<u>III.C.2.</u>

Emission Point ID	Applicable Requirement	Permit Condition Number	Pollutant/Parameter	Limit/Standard	Compliance Demonstration	
					Method	Condition Number
1E, 2E, 3E (each)	C.S.R. § 45-13 (Permit #: R13-1156ED)	III.E.3.2.	Natural Gas Usage	3,002 ft ³ /hr, 2.19 MM ft ³ /hr, 26.3 MM ft ³ /hr	Recordkeeping	III.C.2.
4E, 5E, (each)	C.S.R. § 45-13 (Permit #: R13-1156ED)	III.E.3.2.	Natural Gas Usage	4,000 ft ³ /hr; 2.92 MM ft ³ /month; 35.04 MM ft ³ /yr	Recordkeeping	III.C.2.
6E	C.S.R. § 45-13 (Permit #: R13-1156ED)	III.E.3.2.	Natural Gas Usage	2,500 ft ³ /hr; 1.80 MM ft ³ /month; 21.77 MM ft ³ /yr	Recordkeeping	III.C.2.
7E	C.S.R. § 45-13 (Permit #: R13-1156ED)	III.E.3.2.	Natural Gas Usage	1,140 ft ³ /hr; 0.83 MM ft ³ /month; 9.99 MM ft ³ /yr	Recordkeeping	III.C.2.
13E	C.S.R. § 45-13 (Permit #: R13-1156D)	III.E.2.	Natural Gas Usage	2,463 ft ³ /hr; 1.80 MM ft ³ /month; 21.58 MM ft ³ /yr	Recordkeeping	III.C.2.
1E, 2E, 3E (each)	C.S.R. § 45-13 (Permit #: R13-1156ED)	III.E.3.2.	Propane Usage	32.79 gal/hr; 23,934.2 47 gal/month; 287,210 gal/yr	Recordkeeping	III.C.2.
4E, 5E, (each)	C.S.R. § 45-13 (Permit #: R13-1156ED)	III.E.3.2.	Propane Usage	43.72 gal/hr; 31,912.5 gal/month; 382,950 gal/yr	Recordkeeping	III.C.2.
6E	C.S.R. § 45-13 (Permit #: R13-1156ED)	III.E.3.2.	Propane Usage	20.60 gal/hr; 15,038.0 gal/month; 180,456 gal/yr	Recordkeeping	III.C.2.
7E	C.S.R. § 45-13 (Permit #: R13-1156ED)	III.E.3.2.	Propane Usage	13.12 gal/hr; 9,574.2 47 gal/month; 114,890 gal/yr	Recordkeeping	III.C.2.
13E	C.S.R. § 45-13 (Permit #: R13-1156D)	III.E.2.	Propane Usage	28.33 gal/hr; 20,679.3 gal/month; 248,152 gal/yr	Recordkeeping	III.C.2.
Facility-Wide	WV Code § 22-5-4(a)(14)	III.B.2.a.xi.	Criteria Air Pollutants	Submit Annual Emission Inventory	Reporting	III.B.2.a.xi.
Facility-Wide	WV Code § 22-5-4(a)(15)	III.B.1.a.xiv.	Testing	Conduct as required	N/A	III.B.1.a.xiv.
Facility-Wide	C.S.R. § 45-30-4.3.h.1.B.	III.B.1.a.xii.	Any Newly Applicable Requirement	Notify and Submit Compliance Schedule	N/A	III.B.1.a.xii.
Facility-Wide	40 C.F.R. §§ 61.145, 61.148, and 61.150	III.B.1.a.xiii.	Asbestos	N/A	N/A	III.B.1.a.xiii

1. GENERAL CONDITIONS

a. ENFORCEABLE BY ~~DAQ~~ DAQ AND/OR USEPA

- i. The open burning of refuse by any person, firm, corporation, association or public agency is prohibited except as noted in C.S.R. § 45-6-3.1.(a) and (b). Other exceptions noted in 3.1(c) and 3.1(d) are enforceable by the DAQ, and will become enforceable by the USEPA only when approved into the SIP. (effective date August 31, 2000). (*Facility-Wide Applicability*). Compliance with this streamlined limit assures compliance with the corresponding provisions of the SIP approved version of the same rule.
- ii. No person shall cause, suffer, allow or permit any form of open burning during existing or predicted periods of atmospheric stagnation. C.S.R. § 45-6-3.2. (effective date August 31, 2000). (*Facility-Wide Applicability*). Compliance with this streamlined limit assures compliance with the corresponding provisions of the SIP approved version of the same rule.
- iii. 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. C.S.R. § 45-7-5.1. (effective date August 31, 2000). Compliance with this streamlined limit assures compliance with the corresponding provisions of the SIP approved version of the same rule. C.S.R. § 45-13 - (Permit No. R13-1156~~ED~~) (Condition B.3.) - Issued ~~February 28, 2001~~ May 19, 2003). (*Facility-Wide Applicability*).
- iv. 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. C.S.R. § 45-7-5.2. (effective date August 31, 2000). Compliance with this streamlined limit assures compliance with the provisions of the SIP approved version of the same rule. C.S.R. § 45-13 - (Permit No. R13-1156~~ED~~) (Condition B.3.) - Issued ~~February 28, 2001~~ May 19, 2003). (*Facility-Wide Applicability*).

- v. At such reasonable times as the Director may designate the operator of any manufacturing process source operation may be required to conduct or have conducted stack tests to determine the particulate matter loading in exhaust gases. Such tests shall be conducted in such manner as the Director may specify and be filed on forms and in a manner acceptable to the Director. The Director, or his duly authorized representative, may at his option witness or conduct such stack tests. Should the Director exercise his option to conduct such tests, the operator will provide all the necessary sampling connections and sampling ports to be located in such manner as the Director 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. C.S.R. § 45-7-8.1. (effective date August 31, 2000). Compliance with this streamlined limit assures compliance with the provisions of the SIP approved version of the same rule. C.S.R. § 45-13 - (Permit No. R13-1156ED (Condition B.3.) - Issued ~~February 28, 2001~~ May 19, 2003). (*Facility-Wide Applicability*).
- vi. The Director or his duly authorized representative, may conduct such other tests as he or she may deem necessary to evaluate air pollution emissions. C.S.R. § 45-7-8.2. (effective date August 31, 2000). Compliance with this streamlined limit assures compliance with the provisions of the SIP approved version of the same rule. C.S.R. § 45-13 - (Permit No. R13-1156ED (Condition B.3.) - Issued ~~February 28, 2001~~ May 19, 2003). (*Facility-Wide Applicability*).
- vii. Due to unavoidable malfunction of equipment, emissions exceeding those set forth in section 4.1 of 45CSR7 may be permitted by the Director for periods not to exceed ten (10) days upon specific application to the Director. Such application shall be made within twenty-four (24) hours of the malfunction. In cases of major equipment failure, additional time periods may be granted by the Director provided a corrective program has been submitted by the owner or operator and approved by the Director. C.S.R. § 45-7-9.1. (effective date August 31, 2000). Compliance with this streamlined limit assures compliance with the provisions of the SIP approved version of the same rule. C.S.R. § 45-13 - (Permit No. R13-1156ED (Condition B.3.) - Issued ~~February 28, 2001~~ May 19, 2003). (*Facility-Wide Applicability*).
- viii. 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. C.S.R. § 45-11-5.2. (effective date April 25, 1990). (*Facility-Wide Applicability*).

- ix. At the time a stationary source is alleged to be in compliance with an applicable emission standard and at reasonable times to be determined by the Director thereafter, appropriate tests consisting of visual determinations or conventional in-stack measurements or other tests the Director may specify shall be conducted to determine compliance. C.S.R. § 45-13-6.1. (effective date June 1, 2000). C.S.R. § 45-13 - (Permit No. R13-1156ED (Condition B.4.) - Issued ~~February 28, 2001~~ May 19, 2003). (*Facility-Wide Applicability*).
- x. The Director may suspend or revoke a permit if, after six (6) months from the date of issuance, the holder of the permit cannot provide the Director, at the Director's request, with written proof of a good faith effort that construction, modification, or relocation, if applicable, has commenced. Such proof shall be provided not later than thirty (30) days after the Director's request. If construction or modification of a stationary source is discontinued for a period of eighteen (18) months or longer, the Director may suspend or revoke the permit. C.S.R. § 45-13-10.2. (effective date June 1, 2000). C.S.R. § 45-13 - (Permit No. R13-1156ED (Condition B.4.) - Issued ~~February 28, 2001~~ May 19, 2003). (*Facility-Wide Applicability*).
- xi. The Director may suspend or revoke a permit if the plans and specifications upon which the approval was based or the conditions established in the permit are not adhered to. Upon notice of the Secretary's intent to suspend, modify or revoke a permit, the permit holder may request a conference with the Secretary in accordance with the provisions of W.Va. Code § 22-5-5 to show cause why the permit should not be suspended, modified or revoked. C.S.R. § 45-13-10.3. (effective date June 1, 2000). C.S.R. § 45-13 - (Permit No. R13-1156ED (Condition B.4.) - Issued ~~February 28, 2001~~ May 19, 2003). (*Facility-Wide Applicability*).
- xii. If any applicable requirement is promulgated during the term of this permit, the permittee is responsible for notifying the Secretary and submitting an appropriate compliance schedule. C.S.R. § 45-30-4.3.h.1.B. (effective date July 1, 2001). (*Facility-Wide Applicability*).
- xiii. 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 of the OAQ at least ten (10) working days prior to the commencement of any asbestos removal on the forms prescribed by the Secretary. A copy of this notice is required to be sent to the USEPA, the Office of Waste Management and the Bureau for Public Health - Environmental Health. (*Facility-Wide Applicability*).

xiv. As per provisions set forth in Section III of 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 Section III of this permit or as otherwise approved or specified by the Secretary in accordance with the following:

- (a) For emissions for which there are no applicable requirements within the permit, the Secretary for cause may require testing or monitoring to determine emissions of air pollutants or emissions from sources.
- (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 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 will be revised in accordance with C.S.R. § 45-30-6.4. or C.S.R. § 45-30-6.5 as applicable.
- (c) 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 III.B.1.a.v.(b). If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit will be revised in accordance with C.S.R. § 45-30-6.4. or C.S.R. § 45-30-6.5 as applicable.

All periodic tests to determine mass emission limits from or air pollutant concentrations in discharge stacks and such other tests as

specified in Section III of 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), (*Facility-Wide Applicability*). Compliance with this streamlined limit assures compliance with the corresponding provisions of the SIP approved rule.

b. ENFORCEABLE BY ~~TAQ~~ DAQ ONLY

- i. 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. C.S.R. § 45-4-3.1. (effective date October 1, 1967). (*Facility-Wide Applicability*).

2. SPECIFIC CONDITIONS

a. ENFORCEABLE BY ~~TAQ~~ DAQ AND/OR USEPA

- i. 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. C.S.R. § 45-7-3.1. (effective date August 31, 2000). Compliance with this streamlined limit assures compliance with the provisions of the SIP approved version of the same rule. C.S.R. § 45-13 - (Permit No. R13-1156ED (Condition B.3.) - Issued ~~February 28, 2001~~ May 19, 2003). (*Facility-Wide Applicability*).
- ii. The provisions of subsection 3.1 of 45CSR7 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. C.S.R. § 45-7-3.2. (effective date August 31, 2000). Compliance with this streamlined limit assures compliance with the provisions of the SIP approved version of the same rule. C.S.R. § 45-13 - (Permit No. R13-1156ED (Condition B.3.) - Issued ~~February 28, 2001~~ May 19, 2003). (*Facility-Wide Applicability*).
- iii. No person shall cause, suffer, allow, or permit visible emissions from

any storage structure(s) associated with any manufacturing process(es) that pursuant to subsection 5.1 is required to have a full enclosure and be equipped with a particulate matter control device. C.S.R. § 45-7-3.7. (effective date August 31, 2000). Compliance with this streamlined limit assures compliance with the provisions of the SIP approved version of the same rule. C.S.R. § 45-13 - (Permit No. R13-1156CD (Condition B.3.) - Issued February 28, 2001 ~~May 19, 2003~~). (*Facility-Wide Applicability*).

- iv. ~~No person shall cause, suffer, allow, or permit particulate matter to be vented into the open air from any type source operation or duplicate source operation, or from all air pollution control equipment installed on any type source operation or duplicate source operation in excess of the quantity specified under the appropriate source operation type in Table 45-7A of 45CSR7, as follows:~~

Source ID	Emission Point ID	Process Weight Rate (lbs/hr)	45CSR7 Allowable (lbs/hr)
1S	1E	6,151	6.15
2S	2E	6,151	6.15
3S	3E	5,364	5.36
4S	4E	8,331	8.33
5S	5E	10,637	10.38
6S	6E	5350	5.35
7S	7E	6,151	6.14
8S	8E	17,934	14.76
9S	9E	17,934	14.76
10S	10E	17,934	14.76
Baler A	11E	13,200	11.92
Baler B	12E	6,500	6.5
Baler C	12E	6,500	6.5

~~C.S.R. § 45-7-4.1. (effective date August 31, 2000). Compliance with this streamlined limit assures compliance with the provisions of the SIP approved version of the same rule. C.S.R. § 45-13 - (Permit No. R13-1156CD (Condition B.3.) - Issued February 28, 2001). (*Facility-Wide Applicability*).~~

- v iv. Potential Hazardous Material Emissions--Persons responsible for manufacturing process source operations from which hazardous particulate matter material may be emitted such as, but not limited to

lead, arsenic, beryllium, and other such materials shall give the utmost care and consideration to the potential harmful effects of the emissions resulting from such activities. C.S.R. § 45-7-4.13. (effective date August 31, 2000). Compliance with this streamlined limit assures compliance with the provisions of the SIP approved version of the same rule. C.S.R. § 45-13 - (Permit No. R13-1156€D (Condition B.3.) - Issued ~~February 28, 2001~~ May 19, 2003). (*Facility-Wide Applicability*).

- v. The permittee may use different materials than those listed in permit application R13-1156, R13-1156A, R13-1156B, R13-1156C, and R13-1156D with proper notification, and upon prior written approval from the Director. C.S.R. § 45-13 - (Permit No. R13-1156€D (Condition A.3.) - Issued May 19, 2003). (*Facility-Wide Applicability*).
- vi. Maximum hourly emissions from the ~~seven~~ printing presses shall not exceed the following limits:

Pollutant	Hourly Emissions (lb/hr)							
	1E	2E	3E	4E	5E	6E	7E	<u>13E</u>
CO	0.066 <u>0.250</u>	0.066 <u>0.250</u>	0.066 <u>0.250</u>	0.088 <u>0.330</u>	0.088 <u>0.330</u>	0.22 <u>0.220</u>	0.025 <u>0.100</u>	<u>0.210</u>
NO _x	0.460 <u>0.460</u>	0.460 <u>0.460</u>	0.460 <u>0.460</u>	0.610 <u>0.610</u>	0.610 <u>0.610</u>	0.290 <u>0.290</u>	0.184 <u>0.180</u>	<u>0.400</u>
PM ⁽¹⁾	0.038 <u>0.022</u>	0.038 <u>0.022</u>	0.038 <u>0.022</u>	0.05 <u>0.030</u>	0.05 <u>0.030</u>	0.02 <u>0.019</u>	0.014 <u>0.010</u>	<u>0.019</u>
SO ₂	0.034 <u>0.032</u>	0.034 <u>0.032</u>	0.034 <u>0.032</u>	0.046 <u>0.042</u>	0.046 <u>0.042</u>	0.020 <u>0.020</u>	0.014 <u>0.013</u>	<u>0.027</u>
VOC	5.42	5.42	4.77 4.76	7.25 7.27	9.26 9.25	4.24 4.75	2.71 2.72	<u>5.41</u>

(1) The hourly emission limits on each of the presses for particulate matter are more stringent than those allowed by 45CSR7. Therefore compliance with these streamlined limits assures compliance with the state effective version of 45CSR7 and SIP approved version of the same rule.

C.S.R. § 45-13 - (Permit No. R13-1156€D (Condition A.1.) - Issued ~~February 28, 2001~~ May 19, 2003). (*1E, 2E, 3E, 4E, 5E, 6E, 7E, 13E*).

- vii. Maximum annual emissions from the ~~seven~~ printing presses shall not exceed the following limits:

Pollutant	Annual Emissions (tons/yr)							
	1E	2E	3E	4E	5E	6E	7E	<u>13E</u>

CO	0.289 <u>1.10</u>	0.289 <u>1.10</u>	0.289 <u>1.10</u>	0.385 <u>1.45</u>	0.385 <u>1.45</u>	0.94 <u>0.96</u>	0.110 <u>0.44</u>	<u>0.92</u>
NO _x	2.01	2.01	2.01	2.67	2.67	1.26 <u>1.27</u>	0.806 <u>0.79</u>	<u>1.75</u>
PM	0.166 <u>0.10</u>	0.166 <u>0.10</u>	0.166 <u>0.10</u>	0.22 <u>0.13</u>	0.22 <u>0.13</u>	0.09 <u>0.08</u>	0.061 <u>0.04</u>	<u>0.08</u>
SO ₂	0.149 <u>0.14</u>	0.149 <u>0.14</u>	0.149 <u>0.14</u>	0.201 <u>0.18</u>	0.201 <u>0.18</u>	0.09	0.061	<u>0.12</u>
VOC ⁽¹⁾	23.74 <u>23.73</u>	23.74 <u>23.73</u>	20.89 <u>20.84</u>	31.76 <u>31.85</u>	40.56 <u>40.52</u>	18.56 <u>20.82</u>	11.85 <u>11.90</u>	<u>23.71</u>

(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.

C.S.R. § 45-13 - (Permit No. R13-1156~~ED~~ (Condition A.1.) - Issued ~~February 28, 2001~~ May 19, 2003). (~~1E, 2E, 3E, 4E, 5E, 6E, 7E, 13E~~).

- viii. ~~VOC emissions associated with the application of inks, fountain solution, blanket wash, and roller cleaners, and adhesives shall not exceed the following hourly and annual limits:~~

Material	VOC Emissions	
	lb/hr	ton/yr
Ink^(tt)	37.75	182.99
Fountain Solution^(tt)	2.40	11.03
Blanket Wash	6.03 <u>6.92</u>	26.41 <u>30.31</u>
Roller Cleaner	1.08 <u>1.24</u>	4.73 <u>5.43</u>

Note: (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 as stated in III.B.2.a.vi. and III.B.2.a.vii.~~

C.S.R. § 45-13 - (Permit No. R13-1156~~ED~~ (Condition A.1.) - Issued ~~February 28, 2001~~ May 19, 2003). (~~1E, 2E, 3E, 4E, 5E, 6E, 7E~~ Facility-Wide Applicability).

- ix. 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	0.29	1.26
PM	0.0	0.0	0.29	1.26
VOC	1.83	8.02 8.03	0.29	1.26 1.27
VOC-HAP ⁽¹⁾	1.83	8.02 8.03	0.0	0.0

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

C.S.R. § 45-13 - (Permit No. R13-1156D (Condition A.1.) - Issued February 28, 2001 ~~May 19, 2003~~). (8E, 9E, 10E).

- x. 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:

- i. 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.
- ii. The use of the material shall be incorporated into the record keeping requirements of this permit.
- iii. 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 Specific Requirements A.6. of this permit. 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.

C.S.R. § 45-13 - (Permit No. R13-1156D (Condition A.1.) - Issued May 19, 2003). (*Facility-Wide Applicability*).

- xi. 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.V. Code § 22-5-4(a)(14).

b. ENFORCEABLE BY ~~QAQ~~ DAQ ONLY

None

C. SPECIFIC MONITORING/RECORDKEEPING/REPORTING REQUIREMENTS

1. At least weekly, visual emission checks of each emission point subject to an opacity limit shall be conducted. 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 40 CFR 60, Appendix A, Method 9 evaluation within 24 hours. A Method 9 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.

i. For each period in which the air stream from the Waste Paper System is not recycled back into the plant via the Plant Air Handling System, but rather vented directly to atmosphere through emission points 11E and 12E, the permittee shall conduct visible emissions observations as described in paragraph III.C.1.

ii. The permittee shall maintain records of each event in which the air stream from the Waste Paper System is vented directly to atmosphere via emission points 11E and 12E. Said records shall include but not be limited to date, time, duration, the cause for bypassing the Plant Air Handling System and the steps that were taken to alleviate the condition which caused the bypass.

C.S.R. §45-30-5.1.c (effective date July 1, 2001). (*Facility-Wide Applicability*).

2. Compliance with the emissions limitations associated with the combustion of fuel for the ~~seven (7)~~ printing presses 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 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.
- d. The permittee shall maintain records on site for a period of no less than five (5) years and shall be made available to the Director or his/her duly authorized representative.

C.S.R. §45-30-5.1.c (effective date July 1, 2001). (1E, 2E, 3E, 4E, 5E, 6E, 7E, 13E)

- 3. For the purpose of demonstrating compliance with the VOC emission limits, 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, and water based glue) 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.
 - iii. The hours of operation of printing operations shall be recorded and maintained 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 for 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 III.C.3.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:

$$Mass_{(\text{pounds of VOCs, HAPs/month})} = \sum_{i=1, N} (A_i * B_i)$$

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.

i = each variation of a particular material (i.e., if more than one type of ink is used)

N = total number of variations of that particular material used.

- 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.b.i), 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_(pounds of VOCs, or HAPs/Month)

D = Monthly hours of surface coating (printing) operations

- c. The permittee shall maintain records on site for a period of no less than five (5) years and shall be made available to the Director or his/her duly authorized representative.

C.S.R. § 45-13 - (Permit No. R13-1156) ~~CD~~ (Condition B.1.) - Issued ~~February 28, 2001~~ May 19, 2003). (*Facility-Wide Applicability*). C.S.R. §45-30-5.1.c (effective date July 1, 2001).

4. In order to minimize fugitive particulate matter generation and atmospheric entrainment, the permittee shall operate all manufacturing process equipment according to manufacturer's specifications and with good engineering practices. C.S.R. §45-30-5.1.c (effective date July 1, 2001). (*Facility-Wide Applicability*).
5. For the purposes of 45CSR4, the permittee shall maintain a record of all odor complaints received. Said record shall be maintained on site containing an assessment of the validity of the complaints as well as any corrective actions taken. C.S.R. § 45-30-5.1.c. (effective date July 1, 2001). (*Facility-Wide*).

D. PERMIT SHIELD

1. The permittee has requested and is hereby granted a permit shield in accordance with C.S.R. § 45-30-5.6. The permit shield applies as long as the permittee operates in accordance with the information contained within this permit.
2. The list below identifies requirements which are not applicable to the permittee and the determinations thereof. So long as the permittee operates within the constraints of these determinations, the permit shield shall apply to the provisions of the table.
 - 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 Printing 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 CFR 60, Subpart QQ - *Standards of Performance for the Graphic Arts Industry: Publication Rotogravure Printing*. Quebecor Printing Martinsburg does not utilize rotogravure printing presses as defined in this subpart.
 - f. 40 CFR 60, Subpart EEE - *Standards of Performance for Flexible Vinyl and Urethane Coating and Printing*. Quebecor Printing 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 Printing 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 CFR 63, Subpart KK - *National Emission Standards for the Printing and Publishing Industry*. Quebecor Printing 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 Printing 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.
3. Compliance with the conditions of this permit shall be deemed compliance with the corresponding applicable requirements as of the date of permit issuance and/or that the requirements specifically identified are not applicable to the permittee as of the date of permit issuance. C.S.R. § 45-30-5.6.a. (effective date July 1, 2001).

E. LIMITS ON OPERATION

The following provisions are considered to be LIMITS ON OPERATION for Quebecor Printing Martinsburg:

1. 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 limits:

Material	Monthly	Annual
Ink	<u>9,852</u> 8619.4 gal	<u>118,215</u> 103,433.2 gal
Fountain Solution	<u>1,466</u> 1272.5 gal	<u>17,590</u> 15,270.0 gal
Blanket Wash	<u>762</u> 666.67 gal	<u>9,143</u> 8,000 gal
Roller Cleaner	<u>143</u> 125 gal	<u>1,714</u> 1,500 gal
Water-Based Glue	20,834 gal	250,000 gal
Hot Melt Adhesive	105 tons	1,259.5 tons

Note: Annual usage limits are to be calculated on a 12 month rolling yearly total.

C.S.R. § 45-13 - (Permit No. R13-1156CD (Condition A.2.)- Issued ~~February 28, 2001~~ May 19, 2003). (~~1E, 2E, 3E, 4E, 5E, 6E, 7E, 8E, 9E, 10E~~ Facility-Wide Applicability).

2. ~~The permittee may use different materials than those listed in permit application R13-1156, R13-1156A, R13-1156B, R13-1156C, and R13-1156D with proper notification, and upon prior written approval from the Director. The VOC content of the materials are not to exceed the amounts as follows:~~

Material	VOC Content	VOC-HAP Content
Ink	36% wt.	---
Fountain Solution	1.28 lb/gal (14.3% wt.)	---
Blanket Wash	6.63 lb/gal (99.4 % wt.)	---
Roller Cleaner	6.36 lb/gal (99.5% wt.)	---
Water-Based Glue	0.7% wt.	0.7% wt.

C.S.R. § 45-13 - (Permit No. R13-1156CD (Condition A.3.) - Issued ~~February 28, 2001~~). (~~1E, 2E, 3E, 4E, 5E, 6E, 7E, 8E, 9E, 10E~~ Facility-Wide Applicability).

- 3 2. The permittee shall utilize only natural gas or 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 210,240 MM Btu/yr.

- a. The maximum natural gas use shall not exceed the following:

Source ID	ft ³ /hr	MM ft ³ /month	MM ft ³ /yr
1S	3,002	2.19	26.3
2S	3,002	2.19	26.3
3S	3,002	2.19	26.3
4S	4,000	2.92	35.04
5S	4,000	2.92	35.04
6S	2,500	1.80	21.77
7S	1,140	0.83	9.99
<u>13S</u>	<u>2,463</u>	<u>1.80</u>	<u>21.58</u>

b. The maximum propane fuel use shall not exceed the following:

Source ID	gal/hr	gal/month	gal/yr
1S	32.79	23,934.217	287,210
2S	32.79	23,934.217	287,210
3S	32.79	23,934.217	287,210
4S	43.72	31,912.5	382,950
5S	43.72	23,934.17 <u>31,912.5</u>	287,210 <u>382,950</u>
6S	20.60	15,038.0	180,456
7S	13.12	9,574.217	<u>114,890</u>
<u>13S</u>	<u>28.33</u>	<u>20,679.3</u>	<u>248,152</u>

Annual fuel use shall be determined on a 12 month rolling total.

C.S.R. § 45-13 - (Permit No. R13-1156DC (Condition A.4.) - Issued February 28, 2001 ~~May 19, 2003~~).

F. COMPLIANCE PLAN

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

APPENDIX

List of Abbreviations

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

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