Alliance Printers, LLC
Cumberland County
Brunswick, Maine
A-1090-71-A-N (SM)

Departmental
Findings of Fact and Order
Air Emission License

FINDINGS OF FACT

After review of the air emissions license application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 Maine Revised Statutes Annotated (M.R.S.A.), §344 and §590, the Maine Department of Environmental Protection (Department) finds the following facts:

I. REGISTRATION

A. Introduction

Alliance Printers LLC (AP) has applied for an Air Emission License permitting the operation of emission sources associated with their printing facility.

The equipment addressed in this license is located at 3 Business Parkway, Suite 3, Brunswick, Maine.

B. Emission Equipment

The following equipment is addressed in this air emission license:

Process Equipment

Equipment	Production Rate	Pollution Control Equipment
Press #1 (Cold-Set Press)	25,000 sheets/hr	none
Press #2 (Heat-Set Press)	40,000 sheets/hr	none
Parts Cleaner	N/A	none

Fuel Burning Equipment

Equipment	Maximum Capacity (MMBtu/hr)	Maximum Firing Rate (scf/hr)	Fuel Type, % sulfur
Press #2 Dryer	2.6	2,533	natural gas, negligible

C. Acronyms and Abbreviations

The following acronyms and abbreviations are used in this license:

CMR	Code of Maine Regulations
lb/hr	pounds per hour
lb/MMBtu	pounds per million British Thermal Units
MMBtu/hr	million British Thermal Units per hour
scf/hr	standard cubic feet per hour
SDS	Safety Data Sheet
tpy	tons per year

D. Application Classification

The new source is considered a major source based on whether or not expected emissions exceed the "Significant Emission Levels" as defined in the Department's regulations. The emissions for the new source are determined by the maximum future license allowed emissions, as follows:

Pollutant	Max. Future License (TPY)	Sig. Level
PM	0.6	100
PM_{10}	0.6	100
SO_2	–	100
NO_x	1.1	100
CO	0.9	100
VOC	24.1	50

The Department has determined the facility is a minor source and the application has been processed through *Major and Minor Source Air Emission License Regulations*, 06-096 CMR 115 (as amended). With the VOC limit on the printers, the facility is licensed below the major source thresholds and is considered a synthetic minor.

II. BEST PRACTICAL TREATMENT (BPT)

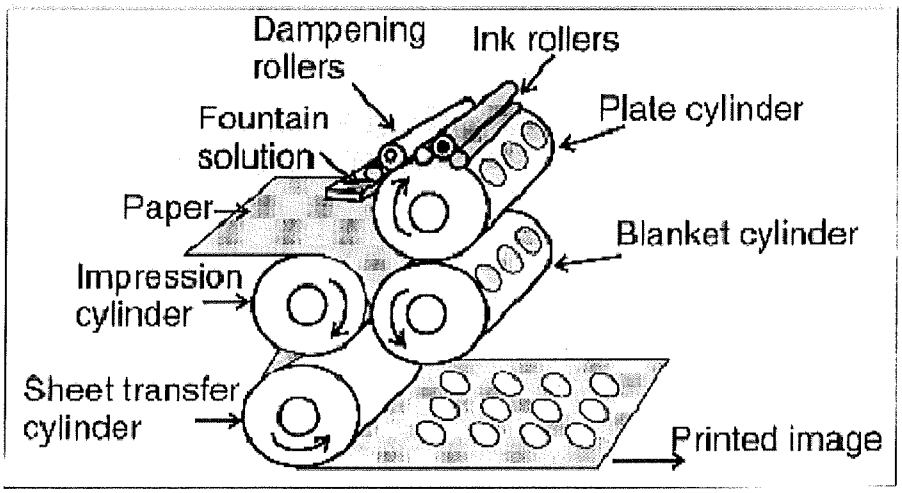
A. Introduction

In order to receive a license, the applicant must control emissions from each unit to a level considered by the Department to represent Best Practical Treatment (BPT), as defined in *Definitions Regulation*, 06-096 CMR 100 (as amended). Separate control requirement categories exist for new and existing equipment as well as for those sources located in designated non-attainment areas.

BPT for new sources and modifications requires a demonstration that emissions are receiving Best Available Control Technology (BACT), as defined in *Definitions Regulation*, 06-096 CMR 100 (as amended). BACT is a top-down approach to selecting air emission controls considering economic, environmental and energy impacts.

B. Process Description

AP operates two offset lithographic printers, one coldset (Press #1) and one heatset (Press #2). Offset printing uses a technique in which ink is transferred (or "offset") from the lithographic plate to a rubber-covered, intermediate "blanket" cylinder and then transferred from the blanket cylinder to the substrate. The lithographic process is based on the repulsion of oil and water. The image area is rendered oil receptive and the non-image area is rendered water receptive.



Inks

Offset lithographic inks are paste inks. Pigments provide the desired color and contain organic and inorganic materials. The vehicle is a combination of resin and solvent that carries pigments and is usually composed of petroleum oils and vegetable oils. Binders suspend the pigment and provide adhesion to the substrate.

Binders are composed of organic resins and polymers or oils and resins. Additives include waxes and lubricants.

Heatset web inks require heat to set the ink. Coldset web (also called non-heatset web) dry by absorption into the substrate or by oxidation.

Fountain Solution
Fountain solution is applied to the lithographic plate to render the non-image areas unreceptive to ink. Since offset lithographic printing inks are oil-based, the fountain solution is water-based. The fountain solution contains buffers to maintain the pH of the solution and a wetting agent or "dampening aid" to enhance the spreadability of the fountain solution across the plate. Traditionally, alcohols are used as dampening aids.

Blanket Wash
Cleaning materials are used to remove excess printing inks, oils, and residual paper from the press. These materials are typically mixtures of organic solvents. Cleaning materials are used to wash the blankets, rollers and to remove residues of excess ink between color changes. Cleaning may be done manually or with an automatic blanket wash system. Cleaning materials used in this manner are often referred to as "blanket wash".

C. Press #1 (Cold-Set Press)

AP operates one cold-set press (Press #1). Press #1 is roll-fed where the individual sheets are cut to size. The maximum production rate is 25,000 sheets per hour.

Press #1 is subject to the requirements of 06-096 CMR 161, *Graphic Arts – Offset Lithography and Letterpress Printing* including, but not limited to, work practice standards and VOC limits.

The ink and fountain solution used in Press #1 has a maximum VOC content of 5%. In accordance with industry standards, it is assumed that 5% of the applied VOC is emitted and the remaining 95% remains in the substrate. Emissions of VOC from Press #1 are calculated to be 0.2 tpy.

Due to the low concentrations of VOC in the inks used, additional add-on controls for Press #1 were determined to be cost prohibitive. BACT for Press #1 is determined to be compliance with the requirements of 06-096 CMR 161 for cold-set presses.

D. Press #2 (Heat-Set Press)

AP plans to install one heat-set press (Press #2). Press #2 will be roll-fed where the individual sheets are cut to size. The maximum production rate is 40,000 sheets per hour. Press #2 is equipped with a chiller for the fountain solution.

Press #2 is capable of running in the cold-set mode and AP will operate it as a cold-set press as necessary.

Press #2 is subject to the requirements of 06-096 CMR 161, *Graphic Arts – Offset Lithography and Letterpress Printing* including, but not limited to, work practice standards and VOC limits.

In accordance with 06-096 CMR 161 §6, it is assumed that 80% of the applied VOC in the ink, 70% of the VOC in the fountain solution and 40% of the machine applied blanket wash is emitted and the remaining VOC remains in the substrate. Emissions of VOC from Press #2 are calculated to be 22.6 tpy.

In their BACT analysis AP considered the use of a regenerative thermal oxidizer (RTO) for control of VOCs from Press #2. Based on the anticipated operations, the annual VOC emission rate from Press #2, and the costs to purchase, install, and operate an RTO, this add-on control technology was determined to be cost prohibitive.

Therefore, BACT for Press #2 is determined to be an annual VOC emission limit of 22.6 tpy from Press #2 and compliance with the requirements of 06-096 CMR 161 for heat-set presses.

E. Press #2 Dryer

Press #2 will be equipped with a natural gas-fired dryer with a maximum heat input of 2.6 MMBtu/hr.

1. BACT Findings

The BACT emission limits for the Press #2 Dryer were based on the following:

PM/PM_{10}	–	0.05 lb/MMBtu based on 06-096 CMR 115, BACT
SO_2	–	0.6 lb/MMscf based on AP-42, Table 1.4-2, dated 7/98
NO_x	–	100 lb/MMscf based on AP-42, Table 1.4-1, dated 7/98
CO	–	84 lb/MMscf based on AP-42, Table 1.4-1, dated 7/98
VOC	–	5.5 lb/MMscf based on AP-42, Table 1.4-2, dated 7/98
Opacity	–	06-096 CMR 101 or previous BACT

The BACT emission limits for the Press #2 Dryer are the following:

Unit	PM (lb/hr)	PM_{10} (lb/hr)	SO_2 (lb/hr)	NO_x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Press #2 Dryer	0.13	0.13	neg	0.25	0.21	0.01

Visible emissions from the stack associated with the Press #2 Dryer shall not exceed 10% opacity on a 6 minute block average, except for no more than one (1) six (6) minute block average in a 3 hour period.

F. Parts Cleaner

AP sometimes uses a solvent-based parts cleaner with a 30-gallon capacity for cleaning various press parts and surfaces in lieu of using solvent soaked rags on the press. As such, the parts cleaner is subject to the requirements of both 06-096 CMR 130, *Solvent Cleaners*, and the cleaning solvent limits in 06-096 CMR 161, *Graphic Arts – Offset Lithography and Letterpress Printing.*

G. Annual Emissions

1. Total Annual Emissions
AP shall be restricted to the following annual emissions, based on a 12 month rolling total.

Total Licensed Annual Emissions for the Facility
Tons/year
(used to calculate the annual license fee)

	PM	**PM_{10}**	**SO_2**	**NO_x**	**CO**	**VOC**
Press #1	–	–	–	–	–	0.2
Press #2	–	–	–	–	–	22.6
Press #2 Dryer	0.6	0.6	–	1.1	0.9	0.1
Parts Cleaner	–	–	–	–	–	1.2
Total TPY	**0.6**	**0.6**	**–**	**1.1**	**0.9**	**24.1**

Pollutant	**Tons/year**
Single HAP	9.9
Total HAP	24.9

2. Greenhouse Gases
Greenhouse gases are considered regulated pollutants as of January 2, 2011, through 'Tailoring' revisions made to EPA's *Approval and Promulgation of Implementation Plans,* 40 CFR Part 52, Subpart A, §52.21 Prevention of Significant Deterioration of Air Quality rule. Greenhouse gases, as defined in

06-096 CMR 100 (as amended), are the aggregate group of the following gases: Carbon dioxide, nitrous oxide, methane, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. For licensing purposes, greenhouse gases (GHG) are calculated and reported as carbon dioxide equivalents (CO_2e).

Based on the facility's fuel use limit(s), the worst case emission factors from AP-42, IPCC (Intergovernmental Panel on Climate Change), and *Mandatory Greenhouse Gas Reporting*, 40 CFR Part 98, and the global warming potentials contained in 40 CFR Part 98, AP is below the major source threshold of 100,000 tons of CO_2e per year. Therefore, no additional licensing requirements are needed to address GHG emissions at this time.

III. AMBIENT AIR QUALITY ANALYSIS

The level of ambient air quality impact modeling required for a minor source shall be determined by the Department on a case-by case basis. In accordance with 06-096 CMR 115, an ambient air quality impact analysis is not required for a minor source if the total emissions of any pollutant released do not exceed the following levels and there are no extenuating circumstances:

Pollutant	Tons/Year
PM_{10}	25
SO_2	50
NO_x	50
CO	250

The total facility licensed emissions are below the emission levels contained in the table above and there are no extenuating circumstances; therefore, an ambient air quality impact analysis is not required as part of this license.

ORDER

Based on the above Findings and subject to conditions listed below, the Department concludes that the emissions from this source:

- will receive Best Practical Treatment,
- will not violate applicable emission standards, and
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants Air Emission License A-1090-71-A-N subject to the following conditions.

Severability. The invalidity or unenforceability of any provision, or part thereof, of this License shall not affect the remainder of the provision or any other provisions. This License shall be construed and enforced in all respects as if such invalid or unenforceable provision or part thereof had been omitted.

STANDARD CONDITIONS

(1) Employees and authorized representatives of the Department shall be allowed access to the licensee's premises during business hours, or any time during which any emissions units are in operation, and at such other times as the Department deems necessary for the purpose of performing tests, collecting samples, conducting inspections, or examining and copying records relating to emissions (38 M.R.S.A. §347-C).

(2) The licensee shall acquire a new or amended air emission license prior to commencing construction of a modification, unless specifically provided for in Chapter 115. [06-096 CMR 115]

(3) Approval to construct shall become invalid if the source has not commenced construction within eighteen (18) months after receipt of such approval or if construction is discontinued for a period of eighteen (18) months or more. The Department may extend this time period upon a satisfactory showing that an extension is justified, but may condition such extension upon a review of either the control technology analysis or the ambient air quality standards analysis, or both. [06-096 CMR 115]

(4) The licensee shall establish and maintain a continuing program of best management practices for suppression of fugitive particulate matter during any period of construction, reconstruction, or operation which may result in fugitive dust, and shall submit a description of the program to the Department upon request. [06-096 CMR 115]

(5) The licensee shall pay the annual air emission license fee to the Department, calculated pursuant to Title 38 M.R.S.A. §353-A. [06-096 CMR 115]

(6) The license does not convey any property rights of any sort, or any exclusive privilege. [06-096 CMR 115]

(7) The licensee shall maintain and operate all emission units and air pollution systems required by the air emission license in a manner consistent with good air pollution control practice for minimizing emissions. [06-096 CMR 115]

(8) The licensee shall maintain sufficient records to accurately document compliance with emission standards and license conditions and shall maintain such records

for a minimum of six (6) years. The records shall be submitted to the Department upon written request. [06-096 CMR 115]

(9) The licensee shall comply with all terms and conditions of the air emission license. The filing of an appeal by the licensee, the notification of planned changes or anticipated noncompliance by the licensee, or the filing of an application by the licensee for a renewal of a license or amendment shall not stay any condition of the license. [06-096 CMR 115]

(10) The licensee may not use as a defense in an enforcement action that the disruption, cessation, or reduction of licensed operations would have been necessary in order to maintain compliance with the conditions of the air emission license. [06-096 CMR 115]

(11) In accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department, the licensee shall:

A. perform stack testing to demonstrate compliance with the applicable emission standards under circumstances representative of the facility's normal process and operating conditions:
   1. within sixty (60) calendar days of receipt of a notification to test from the Department or EPA, if visible emissions, equipment operating parameters, staff inspection, air monitoring or other cause indicate to the Department that equipment may be operating out of compliance with emission standards or license conditions; or
   2. pursuant to any other requirement of this license to perform stack testing.

B. install or make provisions to install test ports that meet the criteria of 40 CFR Part 60, Appendix A, and test platforms, if necessary, and other accommodations necessary to allow emission testing; and

C. submit a written report to the Department within thirty (30) days from date of test completion.

[06-096 CMR 115]

(12) If the results of a stack test performed under circumstances representative of the facility's normal process and operating conditions indicate emissions in excess of the applicable standards, then:

A. within thirty (30) days following receipt of such test results, the licensee shall re-test the non-complying emission source under circumstances representative of the facility's normal process and operating conditions and in accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department; and

B. the days of violation shall be presumed to include the date of stack test and each and every day of operation thereafter until compliance is demonstrated under normal and representative process and operating conditions, except to the extent that the facility can prove to the satisfaction of the Department that

there were intervening days during which no violation occurred or that the violation was not continuing in nature; and

C. the licensee may, upon the approval of the Department following the successful demonstration of compliance at alternative load conditions, operate under such alternative load conditions on an interim basis prior to a demonstration of compliance under normal and representative process and operating conditions.

[06-096 CMR 115]

(13) Notwithstanding any other provisions in the State Implementation Plan approved by the EPA or Section 114(a) of the CAA, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any statute, regulation, or Part 70 license requirement. [06-096 CMR 115]

(14) The licensee shall maintain records of malfunctions, failures, downtime, and any other similar change in operation of air pollution control systems or the emissions unit itself that would affect emissions and that is not consistent with the terms and conditions of the air emission license. The licensee shall notify the Department within two (2) days or the next state working day, whichever is later, of such occasions where such changes result in an increase of emissions. The licensee shall report all excess emissions in the units of the applicable emission limitation. [06-096 CMR 115]

(15) Upon written request from the Department, the licensee shall establish and maintain such records, make such reports, install, use and maintain such monitoring equipment, sample such emissions (in accordance with such methods, at such locations, at such intervals, and in such a manner as the Department shall prescribe), and provide other information as the Department may reasonably require to determine the licensee's compliance status. [06-096 CMR 115]

SPECIFIC CONDITIONS

(16) AP is subject to, and shall comply with, all applicable requirements of 06-096 CMR 161 including, but not limited to, those specifically detailed in the conditions below.

(17) **Press #1**

A. AP shall maintain the as-applied VOC content of the fountain solution on Press #1 at or below 5.0%, by weight, and use no alcohol in the fountain solution. Compliance shall be demonstrated by documentation from the supplier (such as an SDS sheet) showing the VOC content of the fountain solution. AP shall not dilute or alter the fountain solution prior to use. [06-096 CMR 161 §3(A)(2)(c) and 06-096 CMR 115, BACT]

B. AP shall keep records of the amount (gallons), density (lb/gal), and VOC content for each ink and fountain solution used on Press #1. [06-096 CMR 115, BACT]

C. AP shall use on Press #1 only cleaning solvents that have a composite partial vapor pressure less than 10 mm Hg at 20°C, or have a VOC content less than 70% by weight. Compliance shall be demonstrated by documentation from the supplier (such as an SDS sheet) showing the composite partial vapor pressure or VOC content of the cleaning solvent. AP shall not dilute or alter the cleaning solvent prior to use. [06-096 CMR 161 §3(A)(3) and 06-096 CMR BACT]

(18) **Press #2 (used as a heat-set press)**

The following conditions apply to Press #2 when it is being operated as a heat-set press:

A. If the fountain solution used on Press #2 contains only alcohol substitutes, the as-applied VOC content of the fountain solution shall not exceed 5.0% by weight. AP shall not add any alcohol to the fountain solution. [06-096 CMR 161 §3(A)(2)(a)(i)]

B. If the fountain solution used on Press #2 contains alcohol, the as-applied VOC content of the fountain solution shall not exceed 1.6% by weight. [06-096 CMR 161 §3(A)(2)(a)(ii)]

C. If the fountain solution contains alcohol and is refrigerated, AP shall maintain an as-applied VOC content of the fountain solution at or below 3.0% by weight and refrigerate to 60°F or less. [06-096 CMR 161 §3(A)(2)(a)(iii)]

D. Compliance with the requirement to refrigerate the fountain solution to 60°F or less shall be demonstrated by a thermocouple on the fountain solution. AP shall continuously monitor and record the temperature of the fountain solution (to within 0.5°F) at all times there is fountain solution in the on-machine chiller. AP shall maintain records of the date and time of chiller operation. [06-096 CMR 161 §4(C) and 06-096 CMR 115, BACT]

E. If diluted prior to use, compliance with the fountain solution VOC content shall be demonstrated by analytical data for the concentrated materials used to prepare the as-applied fountain solution and the proportions in which they are mixed to make the as-applied fountain solution. The analysis of the concentrated material(s) may be performed by the manufacturer/supplier(s) of those material(s). The analytical data may be derived from an SDS or equivalent information from the supplier as long as it is based on US EPA Method 24 results. [06-096 CMR 161 §4(B)(2)]

F. If not diluted prior to use, compliance with the fountain solution VOC content shall be demonstrated by documentation from the supplier (such as an SDS sheet). [06-096 CMR 161§4(B)(3)]

G. AP shall use on Press #2 only cleaning solvents (blanket wash) that have a composite partial vapor pressure less than 10 mm Hg at 20°C, or have a VOC content less than 70% by weight. [06-096 CMR 161 §3(A)(3)]

H. If diluted prior to use, compliance with the blanket wash VOC content shall be demonstrated by analytical data for the concentrated materials used to prepare the as-applied blanket wash and the proportions in which they are mixed to make the as-applied blanket wash. The analysis of the concentrated material(s) may be performed by the manufacturer/supplier(s) of those material(s). The analytical data may be derived from an SDS or equivalent information from the supplier as long as it is based on US EPA Method 24 results. [06-096 CMR 161 §4(D)(2)]

I. If diluted prior to use, compliance with the as-applied blanket wash VOC composite vapor pressure shall be demonstrated by calculations as described in 06-096 CMR 161 §4(E)(1). [06-096 CMR 161 §4(E)(1)]

J. If not diluted prior to use, compliance with the blanket wash VOC content or composite vapor pressure shall be demonstrated by documentation from the supplier (such as an SDS sheet). [06-096 CMR 161§4(D)(3) and §4(E)(2)]

K. AP shall keep records of the amount (gallons), density (lb/gal), and VOC content (% by weight) for each ink, fountain solution, and blanket wash used on Press #2. [06-096 CMR 115, BACT]

L. AP shall maintain records of all recipes used to prepare the as-applied fountain solution to meet the limits specified. Each recipe shall identify the items specified in 06-096 CMR 161 §5(A)(3). [06-096 CMR 161 §5(A)(3)]

(19) **Press #2 Dryer**

A. The Press #2 Dryer shall only fire natural gas. [06-096 CMR 115, BACT]

B. Emissions shall not exceed the following [06-096 CMR 115, BACT]:

Emission Unit	PM (lb/hr)	PM_{10} (lb/hr)	SO_2 (lb/hr)	NO_x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Press #2 Dryer	0.13	0.13	neg	0.25	0.21	0.01

C. Visible emissions from Press #2 Dryer shall not exceed 10% opacity on a six (6) minute block average, except for no more than one (1) six (6) minute block average in a continuous 3-hour period. [06-096 CMR 115, BACT]

(20) **Press #2 (used as a cold-set press)**

The following conditions apply to Press #2 when it is being operated as cold-set press:

A. AP shall maintain the as-applied VOC content of the fountain solution on Press #2 at or below 5.0%, by weight, and use no alcohol in the fountain solution. Compliance shall be demonstrated by documentation from the supplier (such as an SDS sheet) showing the VOC content of the fountain solution. AP shall not dilute or alter the fountain solution prior to use. [06-096 CMR 161 §3(A)(2)(c) and 06-096 CMR 115, BACT]

B. AP shall keep records of the amount (gallons), density (lb/gal), and VOC content for each ink and fountain solution used on Press #2. [06-096 CMR 115, BACT]

C. AP shall use on Press #2 only cleaning solvents that have a composite partial vapor pressure less than 10 mm Hg at 20°C, or have a VOC content less than 70% by weight. Compliance shall be demonstrated by documentation from the supplier (such as an SDS sheet) showing the composite partial vapor pressure or VOC content of the cleaning solvent. AP shall not dilute or alter the cleaning solvent prior to use. [06-096 CMR 161 §3(A)(3) and 06-096 CMR BACT]

(21) AP shall keep records of the dates and times Press #2 was used as a cold-set press and the dates and times Press #2 was used as a heat-set press. [06-096 CMR 115, BACT]

(22) **Parts Cleaner**

A. AP shall use cleaning solvents in the Parts Cleaner that have a composite partial vapor pressure of less than 10 mm Hg at 20°C or have a VOC content less than 70% by weight. AP shall maintain records of the VOC content or VOC composite partial vapor pressure for all cleaning materials employed. [06-096 CMR 161 §3(A)(3) and §5(A)(5)]

B. AP shall keep records of the amount of solvent added to the Parts Cleaner. [06-096 CMR 115, BACT]

C. The following standards apply to the Parts Cleaner:

1. AP shall attach a permanent conspicuous label to each unit summarizing the following operational standards [06-096 CMR 130]:
   (i) Waste solvent shall be collected and stored in closed containers.
   (ii) Cleaned parts shall be drained of solvent directly back to the cold cleaning machine by tipping or rotating the part for at least 15 seconds or until dripping ceases, whichever is longer.
   (iii) Flushing of parts shall be performed with a solid solvent spray that is a solid fluid stream (not a fine, atomized or shower type spray) at a pressure that does not exceed 10 psig. Flushing shall be performed only within the freeboard area of the cold cleaning machine.
   (iv) The cold cleaning machine shall not be exposed to drafts greater than 40 meters per minute when the cover is open.
   (v) Sponges, fabric, wood, leather, paper products and other absorbent materials shall not be cleaned in the degreaser.
   (vi) When a pump-agitated solvent bath is used, the agitator shall be operated to produce no observable splashing of the solvent against the tank walls or the parts being cleaned. Air agitated solvent baths may not be used.
   (vii) Spills during solvent transfer shall be cleaned immediately. Sorbent material used to clean spills shall then be immediately stored in covered containers.
   (viii) Work area fans shall not blow across the opening of the degreaser unit.
   (ix) The solvent level shall not exceed the fill line.
2. The remote reservoir cold cleaning machine shall be equipped with a perforated drain with a diameter of not more than six inches. [06-096 CMR 130]

(23) **Facility-Wide Limits**

A. AP shall not exceed a facility-wide limit of 24.1 tpy for VOC. Compliance shall be based on a 12-month rolling total basis. [06-096 CMR 115, BACT]

B. AP shall not exceed a facility-wide limit of 9.9 tpy for any single HAP and 24.9 for all HAP combined. Compliance shall be based on a 12-month rolling total basis. [06-096 CMR 115, BACT]

C. AP shall calculate VOC and HAP emissions on a monthly and 12-month rolling total basis using the following assumptions:

1. 5% of the VOCs/HAPs in the ink and fountain solution used on Press #1 and Press #2 (when operated as a cold-set press) are emitted. The remaining 95% remains in the substrate.

2. 80% of the VOCs/HAPs in the ink used on Press #2 (when operated as a heat-set press) are emitted. The remaining 20% remains in the substrate.

3. 70% of the VOCs/HAPs in the fountain solution used on Press #2 (when operated as a heat-set press) are emitted. The remaining 30% remains in the substrate.

4. 40% of the VOCs/HAPs in the machine applied blanket wash on Press #2 (when operated as a heat-set press) are emitted. The remaining 60% remains in the substrate.

5. 100% of the VOCs/HAPs in the cleaning solution or other chemical used on the presses, that is not shipped off site, is assumed to be emitted.

[06-096 CMR 161 and 06-096 CMR 115, BACT]

(24) **Work Practices**

AP shall use the following work practices [06-096 CMR 161 §3(A)(1) and §7]:

A. New and used VOC-containing ink, fountain solution and cleaning solvent shall be stored in a nonabsorbent, non-leaking container. Such a container shall be kept closed at all times except when the container is being filled, emptied, or is otherwise actively in use.

B. Spills and leaks of VOC-containing ink, fountain solution, and cleaning solvent shall be minimized. Any leaked or spilled VOC-containing ink, fountain solution, or cleaning solvent shall be absorbed and removed immediately to a sealed storage container. Spills of hazardous waste may also be subject to reporting pursuant to 30 MRSA §1318-B(1) and the Hazardous Waste Management Rules, 06-096 CMR 850-857.

C. Absorbent applicators, such as cloth and paper, which are moistened with VOC containing ink, fountain solution, or cleaning solvent, shall be stored in a closed, non-absorbent, non-leaking container for disposal or recycling.

D. VOC-containing ink, fountain solution, and cleaning solvents shall be conveyed from one location to another in closed containers or pipes.

E. Cleaning shall be performed to minimize associated VOC emissions.

F. VOC waste containing materials as well as any hazardous waste may not be stored in any container which is rusted, bulging, or leaking. For specific details, refer to the Standards for Generators of Hazardous Waste, 06-096 CMR 851. Additionally, the tanks and containers used to store VOCs or hazardous waste must be compatible with the waste stored in them, be labeled,

and stored according to hazardous waste management rules. Refer to Maine's Hazardous Waste Management Rules, 06-096 CMR 850-857, as well as the federal regulations: 40 CFR 265.172 and 40 CFR 265.177 regarding incompatible containers and wastes.

G. Vapor-tight containers shall be used for the storage of spent or fresh VOCs and for the storage or disposal of cloth or paper impregnated with VOCs that are used for surface preparation, clean up, or coating removal.

H. The use of VOCs is prohibited for the clean up of spray equipment unless equipment is used to collect the cleaning compounds and to minimize their evaporation to the atmosphere.

I. Some VOCs may also be designated as hazardous wastes. The handling, storage and disposal of hazardous wastes including such waste VOCs and cloth or paper impregnated with such waste VOCs are also subject to hazardous waste management standards as stipulated in Maine's Hazardous Waste Management Rules, 06-096 CMR 850-857

(25) AP shall notify the Department within 48 hours and submit a report to the Department on a quarterly basis if a malfunction or breakdown in any component causes a violation of any emission standard (38 M.R.S.A. §605).

DONE AND DATED IN AUGUSTA, MAINE THIS 27 DAY OF January , 2014.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: Marc Allen Robert Cone for
PATRICIA W. AHO, COMMISSIONER

The term of this license shall be ten (10) years from the signature date above.

[Note: If a complete renewal application, as determined by the Department, is submitted prior to expiration of this license, then pursuant to Title 5 MRSA §10002, all terms and conditions of the license shall remain in effect until the Department takes final action on the renewal of the license.]

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 11/8/13
Date of application acceptance: 11/12/13

Date filed with the Board of Environmental Protection:

This Order prepared by Lynn Poland, Bureau of Air Quality.

Filed
JAN 28 2014
State of Maine
Board of Environmental Protection