

ADEQ

ARKANSAS
Department of Environmental Quality

June 8, 2010

David Hakenewerth
Manager Engineering & Maintenance
Worldcolor Jonesboro Division
4708 Krueger Drive
Jonesboro, AR 72401

Dear Mr. Hakenewerth:

The enclosed Permit No. 0921-AOP-R7 is issued pursuant to the Arkansas Operating Permit Program, Regulation # 26.

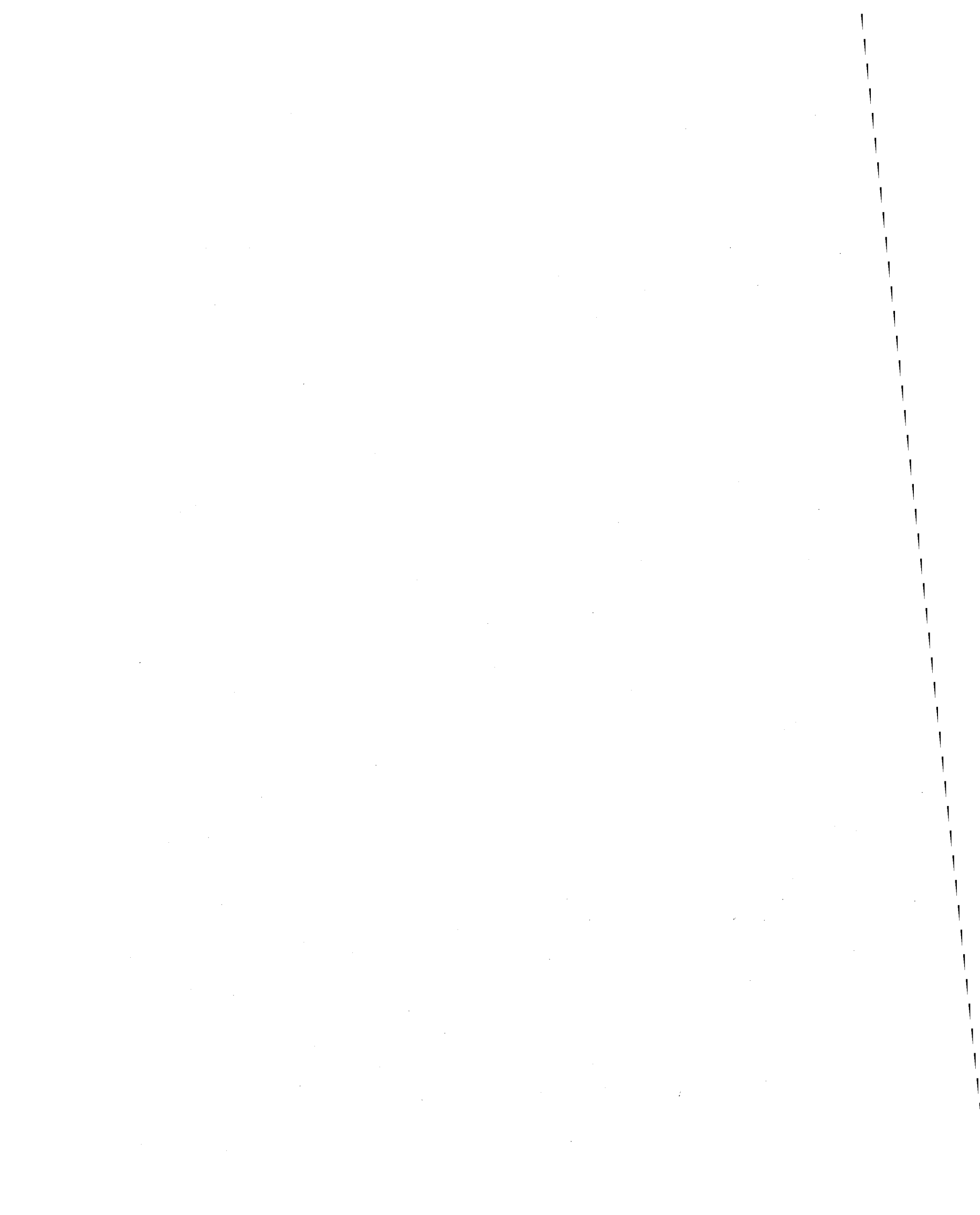
After considering the facts and requirements of A.C.A. §8-4-101 et seq., and implementing regulations, I have determined that Permit No. 0921-AOP-R7 for the construction, operation and maintenance of an air pollution control system for Worldcolor Jonesboro Division to be issued and effective on the date specified in the permit, unless a Commission review has been properly requested under Arkansas Department of Pollution Control & Ecology Commission's Administrative Procedures, Regulation 8.603, within thirty (30) days after service of this decision.

All persons submitting written comments during the thirty (30) day, and all other persons entitled to do so, may request an adjudicatory hearing and Commission review on whether the decision of the Director should be reversed or modified. Such a request shall be in the form and manner required by Regulation 8.603, including filing a written Request for Hearing with the APC&E Commission Secretary at 101 E. Capitol Ave., Suite 205, Little Rock, Arkansas 72201. If you have any questions about filing the request, please call the Commission at 501-682-7890.

Sincerely,



Mike Bates
Chief, Air Division



ADEQ OPERATING AIR PERMIT

Pursuant to the Regulations of the Arkansas Operating Air Permit Program, Regulation 26:

Permit No. : 0921-AOP-R7
Renewal #2
IS ISSUED TO:


Worldcolor Jonesboro Division
4708 Krueger Drive
Jonesboro, AR 72401
Craighead County
AFIN: 16-00181

THIS PERMIT AUTHORIZES THE ABOVE REFERENCED PERMITTEE TO INSTALL, OPERATE, AND MAINTAIN THE EQUIPMENT AND EMISSION UNITS DESCRIBED IN THE PERMIT APPLICATION AND ON THE FOLLOWING PAGES. THIS PERMIT IS VALID BETWEEN:

September 9, 2008 AND September 8, 2013

THE PERMITTEE IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:


Mike Bates
Chief, Air Division

June 8, 2010
Date Modified

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List of Acronyms and Abbreviations

A.C.A.	Arkansas Code Annotated
AFIN	ADEQ Facility Identification Number
CFR	Code of Federal Regulations
CO	Carbon Monoxide
HAP	Hazardous Air Pollutant
lb/hr	Pound Per Hour
MVAC	Motor Vehicle Air Conditioner
No.	Number
NO _x	Nitrogen Oxide
PM	Particulate Matter
PM ₁₀	Particulate Matter Smaller Than Ten Microns
SNAP	Significant New Alternatives Program (SNAP)
SO ₂	Sulfur Dioxide
SSM	Startup, Shutdown, and Malfunction Plan
Tpy	Tons Per Year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

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SECTION I: FACILITY INFORMATION

PERMITTEE: Worldcolor Jonesboro Division

AFIN: 16-00181

PERMIT NUMBER: 0921-AOP-R7

FACILITY ADDRESS: 4708 Krueger Drive
Jonesboro, AR 72401

MAILING ADDRESS: 4708 Krueger Drive
Jonesboro, AR 72401

COUNTY: Craighead County

CONTACT NAME: David Hakenewerth

CONTACT POSITION: Manager Engineering & Maintenance

TELEPHONE NUMBER: 870-333-2011

REVIEWING ENGINEER: Travis Porter

UTM North South (Y): Zone 15: 3965819.33 m

UTM East West (X): Zone 15: 713349.99 m

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SECTION II: INTRODUCTION

Summary of Permit Activity

Worldcolor - Jonesboro Division (AFIN: 16-00181) located at 4708 Krueger Drive, Jonesboro, AR 72401 operates a heatset, web offset lithographic printing facility. This permitting action is necessary to:

1. Remove the Harris M-1000 Press No. 822-5 and dryer (SN-08) and install a Rotomann heatset web offset 8-Color Printing Press and dryer (SN-22).
2. Remove the two Katec 2016 Afterburners (SN-07 and SN-09) and install a Kleenswitch Thermal Oxidizer (SN-23).
3. Add two binders to the binders covered under Adhesive Bindery Main Building (SN-19) with no increases in permitted limits or maximum usages.
4. Add inkjet printers which use only water-based materials as insignificant activities.

These activities decrease permitted emissions by 0.4 tpy CO and 0.6 tpy NO_x.

Process Description

Worldcolor - Jonesboro Division, located in Jonesboro, Arkansas is a heatset, web offset lithographic printing facility. The major processes associated with this facility include pre-press or plate making operations, the lithographic printing presses (which are the primary emission sources at this facility), bindery operations, and inkjet label printing.

The pre-press or plate room operations include plate making. This operation is used to transfer the printing image to printing plates. The plate making equipment use aqueous-based chemicals and have very small associated air emissions.

The heatset web offset printing presses (SN-02, SN-03, SN-04, SN-05, SN-10, SN-13, SN-15, SN-16, SN-17, and SN-22) consist of unwind reel stands, six to nine print stations, natural gas fired dryers, chill stands and rollers, and folding equipment. Emissions of VOCs from the press dryers are controlled by two afterburner systems, operating in parallel. The afterburner systems (SN-18 and SN-23) use natural gas to support the combustion of VOC and maintain adequate afterburner temperatures. Propane is used as a backup fuel when natural gas is unavailable. The lithographic printing process is described in more detail below.

The raw materials used in the heatset process are the web (paper), inks, blanket wash, fountain solution, and general cleaning solvent. The inks used in this process consist of pigments, binders, and high boiling point petroleum-derived hydrocarbons.

The printing presses use an unwind stand, in-feed, printing units, a dryer, a chill stand, and a folder. The web is continuously unwound from an unwind stand or reel which also has the capability of splicing expiring web without stopping the printing process. After the web unwinds, it may pass through a heated web conditioner before entering the first print unit. In the

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first printing unit, ink and fountain solution are applied. Depending on the number of colors being printed, the web will pass either into a dryer or into additional printing units. The paper is printed on both sides before entering the dryer. The dryers are recirculating hot air systems fueled by natural gas and raise the web temperature to approximately 275°F. The ink used in the heatset printing dries very quickly with the volatile portions of the ink exhausted from the dryer to the thermal oxidizer control equipment. The web passes over chill rolls where it is cooled to about 20° above ambient temperature before folding and cutting. Blanket wash may be performed manually or automatically and are considered non-point sources.

After printing, the product is cut, folded, assembled, bound, and packaged for shipping in the bindery operations. The binding of magazines involves cutting, folding, and grinding operations. Waste paper from these operations is collected in a paper trim dust collection system which includes a baghouse paper separator, a bailer system for the collected paper, and an induced draft fan. Exhaust from the induced draft fan is vented inside the building. Emissions from the dust collection system have been quantified and the dust collection system has been identified as an insignificant emissions unit. The bindery operations also include the use of glues for binding magazines and inserts. These glues are typically polyvinyl acetate (PVA) glues which have negligible VOC emissions. Finally, the bindery uses inkjet printers (SN-11 and SN-20) to print labels for direct mailing and shipping products. These emissions are non-point source since they do not exhaust through a process stack.

The facility also has emissions from the solvents and adhesives used (SN-12, SN-19, and SN-21).

Regulations

The following table contains the regulations applicable to this permit.

Regulations
Arkansas Air Pollution Control Code, Regulation 18, effective January 25, 2009
Regulations of the Arkansas Plan of Implementation for Air Pollution Control, Regulation 19, effective July 18, 2009
Regulations of the Arkansas Operating Air Permit Program, Regulation 26, effective January 25, 2009
40 CFR Part 64 – Compliance Assurance Monitoring

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Emission Summary

The following table is a summary of emissions from the facility. This table, in itself, is not an enforceable condition of the permit.

EMISSION SUMMARY				
Source Number	Description	Pollutant	Emission Rates	
			lb/hr	tpy
Total Allowable Emissions		PM	0.8	3.2
		PM ₁₀	0.8	3.2
		SO ₂	0.1	0.3
		VOC	124.6	249.6
		CO	7.9	34.7
		NO _x	9.5	41.2
HAPs		Glycol Ethers*	9.91	17.54
		Methanol*	17.45	31.71
		Naphthalene*	4.48	19.62
		Vinyl Acetate*	0.03	0.04
		Xylene*	3.40	6.35
SN-01	Harris M-1000 Press No. 922	Removed from Service		
SN-02	Harris M-1000B Press No. 822-2	VOC	3.8	134.7 ^a
		Glycol Ethers	0.50	16.73 ^a
		Xylene	0.18	6.29 ^a
SN-03	APV Baker G-14 Press No. 822-3	VOC	5.3	
		Glycol Ethers	0.70	
		Xylene	0.25	
SN-04	APV Baker G-14 Press No. 822-4	VOC	4.7	
		Glycol Ethers	0.62	
		Xylene	0.22	
SN-05	Harris M-1000 Press No. 822-1	VOC	2.5	
		Glycol Ethers	0.33	
		Xylene	0.12	
SN-08	Harris M-1000 Press No. 822-5	Removed from Service		
SN-10	Harris M-1000 Press No. 822-6	VOC	6.9	
		Glycol Ethers	0.78	
		Xylene	0.33	
SN-13	Harris M-1000B Press No. 822-7	VOC	7.4	
		Glycol Ethers	0.94	
		Xylene	0.35	

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EMISSION SUMMARY				
Source Number	Description	Pollutant	Emission Rates	
			lb/hr	tpy
SN-15	MAN Roland Rotomann 64 Press No. 822-8	VOC	13.3	
		Glycol Ethers	1.82	
		Xylene	0.61	
SN-16	MAN Roland Rotomann 64 Press No. 822-9	VOC	13.3	
		Glycol Ethers	1.82	
		Xylene	0.61	
SN-17	Harris M-1000B Press No. 822-10	VOC	7.4	
		Glycol Ethers	0.94	
		Xylene	0.35	
SN-22		VOC	7.5	
		Glycol Ethers	0.99	
		Xylene	0.35	
SN-18 & SN-23	Eisemann (SN-18) Afterburner & Kleenswitch (SN-23) Thermal Oxidizer	PM	0.8	3.2
		PM ₁₀	0.8	3.2
		SO ₂	0.1	0.3
		VOC	29.7	61.1
		CO	7.9	34.7
		NO _x	9.5	41.2
		Glycol Ethers	0.47	0.81
Xylene	0.03	0.06		
SN-14	Press No. 822-8	Not Installed - Removed from Permit		
SN-11	Ink Jet Printer Emissions (Main Building)	VOC	12.3	22.2
		Methanol	12.21	22.18
SN-12	Press Room Emissions	VOC	5.0	21.9
		Naphthalene	4.48	19.62
		Vinyl Acetate	0.01	0.01
SN-19	Adhesive Bindery (Main Building)	VOC	0.1	0.1 ^b
		Vinyl Acetate	0.01	0.03 ^b
SN-21	Adhesive Bindery (Auxiliary Building)	VOC	0.1	
		Vinyl Acetate	0.01	
SN-20	Ink Jet Printer Emissions (Auxiliary Building)	VOC	5.3	9.6
		Methanol	5.24	9.53

*HAPs included in the VOC totals. Other HAPs are not included in any other totals unless specifically stated.

- a. Combined annual limit for SN-02, SN-03, SN-04, SN-05, SN-10, SN-13, SN-15, SN-16, SN-17, and SN-22.
- b. Combined annual limit for SN-19 and SN-21.

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SECTION III: PERMIT HISTORY

The Jonesboro Division of World Color Press began operation in 1972.

921-A was the first permit issued to W. A. Krueger Company for this facility on February 28, 1989. The facility started operation in 1972 with one printing press. There were six printing presses by 1989. The only pollutant permitted was VOC and the amount permitted was 304 tons per year with no control equipment.

921-AR-1 was issued to Ringier America--Jonesboro Division on May 3, 1991. Permit limits for VOC was 199 tons per year. One afterburner was installed on the stack emissions from four of the presses. Two presses were operated without controls.

921-AR-2 was issued to Ringier America--Jonesboro Division on August 31, 1992. A seventh printing press and a second afterburner were installed at that time. Permit limits were 187.2 tons per year VOC, 21.22 tons of oxides of nitrogen, and 14.9 tons per year of carbon monoxide. Two presses operated without controls.

921-AR-3 was issued to Jonesboro Division of World Color Press, Inc. on July 10, 1997. One press (SN-06) was retired and the afterburner arrangement was changed such that only one press (SN-05) operated without controls. Facility emissions limits were 184.19 tons per year VOC, 25.04 tons per year of oxides of nitrogen, 15.33 tons per year of carbon monoxide, and 0.05 tons per year of sulfur dioxide.

921-AOP-R0 was issued to Jonesboro Division of World Color Press, Inc. on May 6, 1998. The afterburner arrangement was changed from the previous permit such that all presses were controlled via afterburners. HAPs were quantified for the first time in this permit. The ink jet printer and solvent and adhesive fugitive emissions were also quantified for the first time in this permit. Facility emissions limits were 220.8 tons per year VOC, 24.0 tons per year oxides of nitrogen, 14.9 tons per year carbon monoxide, 2.7 tons per year particulate matter and 0.1 tons per year sulfur dioxide.

921-AOP-R1 was issued to Jonesboro Division of World Color Press, Inc. on October 9, 1998. The modification was issued for the addition of another printing press (SN-13) and the addition of six new ink jet printers increasing the emissions at SN-11. Facility emission limits were 259.6 tons per year VOC, 26.3 tons per year oxides of nitrogen, 15.4 tons per year carbon monoxide, 3.0 tons per year particulate matter and 0.1 tons per year sulfur dioxide.

921-AOP-R2 was issued to Quebecor World – Jonesboro Division on August 20, 2001. The permit modification was issued to change the processes for minimizing emissions when a printing press must be operated while an afterburner system is down for emergency repairs. The emission limits were identical to the previous permit.

0921-AOP-R3 was issued to Quebecor World – Jonesboro Division on June 6, 2003. This permit modification was issued as the first Title V renewal for the facility. The modification also

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allowed the addition of a new press (SN-14). Emission limits were: PM/PM₁₀ – 2.1 tpy, SO₂ – 0.2 tpy, VOC – 298.9 tpy, CO – 22.6 tpy, NO_x – 26.9 tpy, R.T. 1.0 HAP – 78.8 tpy, R.T. 0.1 HAP – 0.01 tpy, and Glycol Ethers – 12.61 tpy.

0921-AOP-R4 was issued to Quebecor World – Jonesboro Division on October 21, 2005. This permit modification was issued for a facility expansion. The facility proposed to install 3 new presses (SN-15, SN-16, and SN-17) and to install a relocated regenerative thermal oxidizer (SN-18) which was sized to control the emissions from all of the presses. The existing oxidizers remained in place and operable and were used to control the facility at a reduced operating rate when the new oxidizer is off line. All emission limits were recalculated based on higher destruction efficiencies in the new oxidizer, successfully stack testing the existing oxidizers at a higher efficiency, and some material usage limits were reduced. The printing press authorized by the previous permit modification (SN-14) was not installed and was removed from the permit. Emission limits were: 3.3 tpy PM/PM₁₀, 0.3 tpy SO₂, 248.3 tpy VOC, 36.1 tpy CO, 42.9 tpy NO_x, 15.39 tpy glycol ethers, 58.02 tpy RT 1.0 HAP, and 0.01 tpy RT 0.1 HAP.

0921-AOP-R5 was issued on September 9, 2008. This permitting action was necessary to: renew the facility's Title V air permit; remove SN-01; decrease the annual throughput of the ink used at the presses from 13,200,000 lb/yr to 10,500,000 lb/yr; increase the annual throughput of the automatic blanket wash used at the presses from 70,000 lb/yr to 160,000 lb/yr; decrease the annual throughput of the manual blanket wash used at the presses from 300,000 lb/yr to 282,000 lb/yr; decrease the annual throughput of the fountain solution used at the presses from 700,000 lb/yr to 480,000 lb/yr; increase the glycol ether content of the fountain solution used at the presses from 9% to 15%; increase the annual throughput of the ink used at SN-11 from 7,314 lb/yr to 7,400 lb/yr; increase the annual throughput of the wash used at SN-11 from 7,314 lb/yr to 7,400 lb/yr; increase the VOC content of the ink used at SN-11 from 80% to 83%; increase the HAP content of the ink used at SN-11 from 80% to 83%; increase the VOC content of the miscellaneous solvents used at SN-12 from 97% to 100%; permit adhesive bindery operations (SN-19); and revise the insignificant activities list. The total permitted annual emission rate limit decreases associated with this modification included: 0.1 tons per year (tpy) PM/PM₁₀, 1.0 tpy CO, 1.1 tpy NO_x, 0.25 tpy Relative Toxicity (RT) 1.0 HAPs (includes methanol, naphthalene, and xylene). The total permitted annual emission rate limit increases associated with this modification included: 1.3 tpy VOC, 2.15 tpy glycol ethers, and 0.01 tpy RT 0.1 HAPs (includes vinyl acetate).

0921-AOP-R6 was issued on July 7, 2009. This permitting action: (1) permitted up to six stitchers and/or perfect binders (adhesive bindery usage, SN-21) with up to six inkjet printers (SN-20) in the auxiliary building; (2) increased the vinyl acetate content of the adhesive used at SN-19 and SN-21 from 0.05% to 0.5%; (3) reduced the makeup solvent usage limit from 50,000 lb/yr to 30,800 lb/yr for the inkjet printers at SN-11; (4) increased the adhesive usage (SN-19 and SN-21) from 4,020 lb/yr to 8,059.2 lb/yr; and (5) permitted the adhesive bindery operations (SN-19 and SN-21) to use non-VOC, non-HAP, and non-air contaminant containing adhesives without counting toward the adhesive usage limit. The total permitted annual emission rate limit changes associated with this modification include: -0.09 tpy methanol and 0.02 tpy vinyl acetate.

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SECTION IV: SPECIFIC CONDITIONS

SN-02, SN-03, SN-04, SN-05, SN-10, SN-13, SN-15, SN-16, SN-17, and SN-22
 Printing Presses

Source Description

There are ten heatset web offset printing presses installed at the Worldcolor, Inc. – Jonesboro Facility. Each press is equipped with a natural gas fired dryer and chill rolls for cooling the media after printing. Regular emissions from these presses are ducted to the afterburners with only the non-stack emissions going directly to the atmosphere. These emissions are the non-stack emissions from the presses.

Specific Conditions

1. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Specific Conditions #3, #4, and #6. [Regulation 19, §19.501 et seq., and 40 CFR Part 52, Subpart E]

Source No.	Description	Pollutant	lb/hr	tpy
SN-02	Harris M-1000B Press No. 822-2	VOC	3.8	134.7 ^a
SN-03	APV Baker G-14 Press No. 822-3	VOC	5.3	
SN-04	APV Baker G-14 Press No. 822-4	VOC	4.7	
SN-05	Harris M-1000 Press No. 822-1	VOC	2.5	
SN-10	Harris M-1000 Press No. 822-6	VOC	6.9	
SN-13	Harris M-1000B Press No. 822-7	VOC	7.4	
SN-15	MAN Roland Rotomann 64 Press No. 822-8	VOC	13.3	
SN-16	MAN Roland Rotomann 64 Press No. 822-9	VOC	13.3	
SN-17	Harris M-1000B Press No. 822-10	VOC	7.4	
SN-22	Rotomann 8-Color Press No. 822-11	VOC	7.5	

- a. Combined annual limit for SN-02, SN-03, SN-04, SN-05, SN-10, SN-13, SN-15, SN-16, SN-17 and SN-22.

2. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Specific Conditions #3, #4, and #7. [Regulation 18, §18.801, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Source No.	Description	Pollutant	lb/hr	tpy
SN-02	Harris M-1000B Press No. 822-2	Glycol Ethers	0.50	16.73 ^a
		Xylene	0.18	6.29 ^a
SN-03	APV Baker G-14 Press No. 822-3	Glycol Ethers	0.70	
		Xylene	0.25	

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Source No.	Description	Pollutant	lb/hr	tpy
SN-04	APV Baker G-14 Press No. 822-4	Glycol Ethers	0.62	
		Xylene	0.22	
SN-05	Harris M-1000 Press No. 822-1	Glycol Ethers	0.33	
		Xylene	0.12	
SN-10	Harris M-1000 Press No. 822-6	Glycol Ethers	0.78	
		Xylene	0.33	
SN-13	Harris M-1000B Press No. 822-7	Glycol Ethers	0.94	
		Xylene	0.35	
SN-15	MAN Roland Rotomann 64 Press No. 822-8	Glycol Ethers	1.82	
		Xylene	0.61	
SN-16	MAN Roland Rotomann 64 Press No. 822-9	Glycol Ethers	1.82	
		Xylene	0.61	
SN-17	Harris M-1000B Press No. 822-10	Glycol Ethers	0.94	
		Xylene	0.35	
SN-22	Rotomann 8-Color Press No. 822-11	Glycol Ethers	0.99	
		Xylene	0.35	

a. Combined annual limit for SN-02, SN-03, SN-04, SN-05, SN-10, SN-13, SN-15, SN-16, SN-17, and SN-22.

3. The permittee shall operate the printing presses with their stack emissions processed through a functional afterburner during normal operations. The permittee shall follow the provisions of the latest Air Pollution Control System Contingency Plan during emergency failures of an afterburner. The current plan is included as Appendix A. [§18.1004 of Regulation 18, §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6]
4. The maximum allowable usage of ink, blanket wash solution (BW), and fountain solution (FW) at the facility shall not exceed the following usage limits per rolling twelve-month period. [§18.1004 of Regulation 18, §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6]

Material	Maximum Usage Limit (lbs)
Ink	10,500,000
Automatic Blanket Wash	160,000
Manual Blanket Wash	282,000
Fountain Solution	480,000

5. The permittee shall maintain monthly records to demonstrate compliance with Specific Condition #4. The permittee will update the records by the last day of the month following the month the usages occurred. The permittee will keep the records onsite, and make the records available to Department personnel upon request. These records shall

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include the rolling twelve-month totals and each individual month's data. A semi-annual report containing this information shall be submitted to the Department in accordance with General Provision #7. [§18.1004 of Regulation 18; §19.705 of Regulation 19; 40 CFR Part 52, Subpart E; and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

6. The permittee shall not exceed the following VOC content limits. Material Safety Data Sheets or equivalent documentation shall be maintained on-site to demonstrate compliance with this specific condition. [§19.705 of Regulation 19; A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311; and 40 CFR 70.6]

Material	Maximum VOC Content (% by weight)
Ink	45
Blanket Wash	100
Fountain Solution Concentrate	22.5

7. The blanket wash and fountain solution shall only contain those hazardous air pollutants listed in the following table. The blanket wash and fountain solutions shall not exceed the HAP content limits listed in the following table. Material Safety Data Sheets or equivalent documentation shall be maintained on-site to demonstrate compliance with this specific condition. [§18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Material	HAP	Maximum HAP Content (% by weight)
Blanket Wash	Glycol Ethers	5
	Xylene	5.3
Fountain Solution	Glycol Ethers	15

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SN-18 and SN-23
 Eisemann Thermal Afterburner (SN-18) and Kleenswitch Thermal Oxidizer (SN-23)

Source Description

The Eisenmann Regenerative Thermal Oxidizer has a 97% rated efficiency by its manufacturer, and SN-23 is a Kleenswitch Thermal Oxidizer with a rated efficiency of 97%. Stack emissions from the printing presses are routed through the Eisenmann and Kleenswitch units (operated in parallel) during normal operation.

Specific Conditions

8. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Specific Conditions #4, #6, #11, #14, #15, and #16. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
PM ₁₀	0.8	3.2
SO ₂	0.1	0.3
VOC _{gc}	0.5	2.3
VOC _p	29.2	58.8
CO	7.9	34.7
NO _x	9.5	41.2

VOC_{gc} – volatile organic compounds as the result of natural gas combustion

VOC_p – volatile organic compounds as the result of printing

9. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Specific Conditions #4, #7, #11, and #12. [Regulation 18, §18.801 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Pollutant	lb/hr	tpy
PM	0.8	3.2
Glycol Ethers	0.47	0.81
Xylene	0.03	0.06

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10. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9. The permittee shall use only natural gas (utility natural gas or LPG) to fire the afterburner in order to assure compliance with this opacity limit.

SN	Limit	Regulatory Citation
SN-18	5%	[Regulation No. 18 §18.501 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
SN-23	5%	[Regulation No. 18 §18.501 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

11. The Eisemann Thermal Afterburner (SN-18) shall be equipped with a temperature controller which monitors, records, and controls the operating temperature at or above 1300° Fahrenheit any time a press controlled by the afterburner is operating. [§18.1004 of Regulation 18, §19.304 and §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, 40 CFR Part 64, and 40 CFR 70.6]
12. The Kleenswitch Thermal Oxidizer (SN-23) shall be equipped with a temperature controller which monitors, records, and controls the operating temperature at or above 1400° Fahrenheit any time a press controlled by the afterburner is operating. [§18.1004 of Regulation 18, §19.304 and §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, 40 CFR Part 64, and 40 CFR 70.6]
13. The permittee shall comply with all applicable provisions of Compliance Assurance Monitoring, including but not limited to: [§19.304 of Regulation 19 and 40 CFR Part 64]
- a. Indicator: The permittee shall monitor the temperature at SN-18, and SN-23. [40 CFR Part §64.6(c)(1)(i)]
 - b. Indicator Range and Averaging Period: The permittee shall continuously maintain the temperature at or above 1300° Fahrenheit for Eisemann unit and at or above 1400° Fahrenheit for the Kleenswitch unit. [40 CFR Part §64.6(c)(2)]
 - c. Measurement Approach: The afterburners shall be equipped with electronic pen charts. [40 CFR Part §64.6(c)(1)(ii)]
 - d. Data Representativeness: The permittee shall measure the temperature at a location such that the readings are representative of the afterburner operation temperature. [40 CFR Part §64.6(c)(1)(iii)]
 - e. QA/QC and Frequency of Monitoring: The permittee shall follow the manufacturer's recommendations for quality assurance and control. The temperature shall be monitored continuously. [40 CFR Part §64.6(c)(1)(iii) and §64.3(b)(4)]

- f. A monitoring report shall be submitted to the Department in accordance with General Provision #7 and shall include the following per 40 CFR §64.9(a)(2): [40 CFR Part §64.9(a)(1)]
 - i. The information required under 40 CFR §70.6(a)(3)(iii);
 - ii. Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;
 - iii. Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and
 - iv. A description of the actions taken to implement a QIP, if required, during the reporting period as specified in §64.8. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.
14. The permittee shall measure the VOC emissions from both the Eisemann (SN-18) and Kleenswitch (SN-23) thermal afterburners once every 5 years using EPA Reference Method 25A or an equivalent method provided the equivalent method has been approved by the Department before use. The testing required shall be conducted over three, one hour periods. The test shall be conducted at a production rate representative of at least 90% of maximum facility production as established in the testing protocol. Emission results shall be extrapolated to correlate with 100% of the permitted capacity to determine compliance. The presses shall be operating normally during that period. The testing shall be conducted in accordance with Plantwide Condition #3. [§19.702 of Regulation 19 and 40 CFR Part 52, Subpart E]
15. The permittee shall measure the initial VOC emissions from the Eisemann afterburner (SN-18) using EPA Reference Method 25A or an equivalent method provided the equivalent method has been approved by the Department before use. The testing required shall be conducted over three, one hour periods. The test shall be conducted at a production rate representative of at least 90% of maximum facility production as established in the testing protocol. The presses shall be operating normally during that period. The test shall be completed in the time frame specified in Plantwide Condition #3. This initial testing was conducted on April 13, 2006. [§19.702 of Regulation 19 and 40 CFR Part 52, Subpart E].
16. The permittee shall measure the initial VOC emissions from the Kleenswitch Thermal Oxidizer (SN-23) using EPA Reference Method 25A or an equivalent method provided the equivalent method has been approved by the Department before use. The testing required shall be conducted over three, one hour periods. The test shall be conducted at a production rate representative of at least 90% of maximum facility production as established in the testing protocol. The presses shall be operating normally during that period. The test shall be completed in the time frame specified in Plantwide Condition

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#3. [§19.702 of Regulation 19 and 40 CFR Part 52, Subpart E].

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SN-11 and SN-20
 Ink Jet Printer Emissions (Main Building and Auxiliary Building)

Source Description

Inkjet printers are used to print the mailing labels for magazines distributed directly from this facility.

Specific Conditions

17. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Specific Conditions #19, #21, and #23. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

SN	Pollutant	lb/hr	tpy
11	VOC	12.3	22.2
20	VOC	5.3	9.6

18. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Specific Conditions #19, #21, and #24. [Regulation 18, §18.801 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN	Pollutant	lb/hr	tpy
11	Methanol	12.21	22.18
20	Methanol	5.24	9.53

19. Material usage in the ink jet printer operations at SN-11 shall not exceed those listed in the following table for any rolling twelve-month period. [§18.1004 of Regulation 18, §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6]

SN	Material Used	Maximum Usage Limit (lbs)
11	Ink	7,400
	Wash	7,400
	Makeup Solvent	30,800

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20. The permittee shall maintain monthly records to demonstrate compliance with Specific Condition #19. The permittee will update the records by the last day of the month following the month the usages occurred. The permittee will keep the records onsite, and make the records available to Department personnel upon request. These records shall include the 12-month rolling totals and each individual month's data. A semi-annual report containing this information shall be submitted to the Department in accordance with General Provision #7. [§18.1004 of Regulation 18; §19.705 of Regulation 19; A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311; and 40 CFR Part 52, Subpart E]
21. Material usage in the ink jet printer operations at SN-20 shall not exceed those listed in the following table for any rolling twelve-month period. [§18.1004 of Regulation 18, §19.405(B) and §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6]

SN	Material Used	Maximum Usage Limit (lbs)
20	Ink	3,200
	Wash	3,200
	Makeup Solvent	13,200

22. The permittee shall maintain monthly records to demonstrate compliance with Specific Condition #21. The permittee will update the records by the last day of the month following the month the usages occurred. The permittee will keep the records onsite, and make the records available to Department personnel upon request. These records shall include the rolling twelve-month totals and each individual month's data. A semi-annual report containing this information shall be submitted to the Department in accordance with General Provision #7. [§18.1004 of Regulation 18; §19.705 of Regulation 19; A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311; and 40 CFR Part 52, Subpart E]
23. The permittee shall not exceed the following VOC content limits at SN-11 or SN-20. Material Safety Data Sheets or equivalent documentation shall be maintained on-site to demonstrate compliance with this specific condition. [§19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6]

Material	Maximum VOC Content (% by weight)
Ink	83
Wash	100
Makeup Solvent	100

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24. The ink jet printer supplies used by the permittee shall only contain those hazardous air pollutants listed in the following table. These supplies shall not exceed the HAP content limits listed in the following table at SN-11 or SN-20. Material Safety Data Sheets or equivalent documentation shall be maintained on-site to demonstrate compliance with this specific condition. [§18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Material	HAP	Maximum HAP Content (% by weight)
Ink	Methanol	83
Wash	Methanol	100
Makeup Solvent	Methanol	100

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SN-12
Press Room Emissions

Source Description

The maximum usage of miscellaneous solvents and adhesives at the facility is permitted at 43,600 pounds per year of miscellaneous solvents and 4,000 pounds per year of miscellaneous adhesives. However, the actual usage on an annual basis is significantly lower than the maximum usages identified.

Specific Conditions

25. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Specific Conditions #27 and #29. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
VOC	5.0	21.9

26. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Specific Conditions #27 and #30. [Regulation 18, §18.801 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Pollutant	lb/hr	tpy
Naphthalene	4.48	19.62
Vinyl Acetate	0.01	0.01

27. The usage of miscellaneous solvents and adhesives in the press room shall not exceed the limits listed in the following table per rolling twelve-month period. [§18.1004 of Regulation 18, §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6]

Material Used	Maximum Usage Limit (lbs)
Solvent	43,600
Adhesive	4,000

28. The permittee shall maintain monthly records to demonstrate compliance with Specific Condition #27. The permittee will update the records by the last day of the month

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following the month the usages occurred. The permittee will keep the records onsite, and make the records available to Department personnel upon request. These records shall include the rolling twelve-month totals and each individual month's data. A semi-annual report containing this information shall be submitted to the Department in accordance with General Provision #7. [§18.1004 of Regulation 18; §19.705 of Regulation 19; A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311; and 40 CFR Part 52, Subpart E]

29. The permittee shall not exceed the following VOC content limits at SN-12. Material Safety Data Sheets or equivalent documentation shall be maintained on-site to demonstrate compliance with this specific condition. [§19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6]

Material	Maximum VOC Content (% by weight)
Solvent	100
Adhesive	1.1

30. The solvent and adhesive used by the permittee at SN-12 shall only contain those hazardous air pollutants listed in the following table. The solvents and adhesives shall not exceed the HAP content limits listed in the following table. Material Safety Data Sheets or equivalent documentation shall be maintained on-site to demonstrate compliance with this specific condition. [§18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Material	HAP	Maximum HAP Content (% by weight)
Solvent	Naphthalene	90
Adhesive	Vinyl Acetate	0.5

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SN-19 and SN-21
 Adhesive Bindery (Main Building and Auxiliary Building)

Source Description

SN-19 and SN-21 includes adhesive use in the bindery operations.

Specific Conditions

31. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Specific Conditions #33 and #36. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

SN	Pollutant	lb/hr	tpy
19	VOC	0.1	0.1*
21	VOC	0.1	

*Annual limit for SN-19 and SN-21 combined.

32. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Specific Conditions #33 and #37. [Regulation 18, §18.801, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN	Pollutant	lb/hr	tpy
19	Vinyl Acetate	0.01	0.03*
21	Vinyl Acetate	0.01	

*Annual limit for SN-19 and SN-21 combined.

33. Except as allowed by Specific Condition #35, the usage of adhesives at SN-19 and SN-21 (combined) shall not exceed the limits listed in the following table per rolling twelve-month period. [§18.1004 of Regulation 18, §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6]

Material Used	Maximum Usage Limit (lbs)
Adhesive	8,059.2

34. The permittee shall maintain monthly records to demonstrate compliance with Specific Condition #33. The permittee will update the records by the last day of the month following the month the usages occurred. The permittee will keep the records onsite, and

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make the records available to Department personnel upon request. These records shall include the rolling twelve-month totals and each individual month's data. A semi-annual report containing this information shall be submitted to the Department in accordance with General Provision #7. [§18.1004 of Regulation 18; §19.705 of Regulation 19; A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311; and 40 CFR Part 52, Subpart E]

35. The permittee may use adhesives that do not contain any VOCs, HAPs, or air contaminants at SN-19 and SN-21 and not count these adhesives towards the usage restriction of Specific Condition #33. Material Safety Data Sheets or equivalent documentation shall be kept on site to document that any adhesive used under this specific condition does not contain any VOCs, HAPs, or air contaminants. [§18.1004 of Regulation 18, §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, and 40 CFR 70.6]
36. The permittee shall not exceed the following VOC content limits at SN-19 or SN-21. Material Safety Data Sheets or equivalent documentation shall be maintained on-site to demonstrate compliance with this specific condition. [§19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6]

Material	Maximum VOC Content (% by weight)
Adhesive	1.1

37. The adhesive used by the permittee shall only contain those hazardous air pollutants listed in the following table. The adhesives shall not exceed the HAP content limits listed in the following table at SN-19 or SN-21. Material Safety Data Sheets or equivalent documentation shall be maintained on-site to demonstrate compliance with this specific condition. [§18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Material	HAP	Maximum HAP Content (% by weight)
Adhesive	Vinyl Acetate	0.5

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SECTION V: COMPLIANCE PLAN AND SCHEDULE

Worldcolor Jonesboro Division will continue to operate in compliance with those identified regulatory provisions. The facility will examine and analyze future regulations that may apply and determine their applicability with any necessary action taken on a timely basis.

SECTION VI: PLANTWIDE CONDITIONS

1. The permittee shall notify the Director in writing within thirty (30) days after commencing construction, completing construction, first placing the equipment and/or facility in operation, and reaching the equipment and/or facility target production rate. [Regulation 19, §19.704, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
2. If the permittee fails to start construction within eighteen months or suspends construction for eighteen months or more, the Director may cancel all or part of this permit. [Regulation 19, §19.410(B) and 40 CFR Part 52, Subpart E]
3. The permittee must test any equipment scheduled for testing, unless otherwise stated in the Specific Conditions of this permit or by any federally regulated requirements, within the following time frames: (1) new equipment or newly modified equipment within sixty (60) days of achieving the maximum production rate, but no later than 180 days after initial start up of the permitted source or (2) operating equipment according to the time frames set forth by the Department or within 180 days of permit issuance if no date is specified. The permittee must notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. The permittee shall submit the compliance test results to the Department within thirty (30) days after completing the testing. [Regulation 19, §19.702 and/or Regulation 18 §18.1002 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
4. The permittee must provide:
 - a. Sampling ports adequate for applicable test methods;
 - b. Safe sampling platforms;
 - c. Safe access to sampling platforms; and
 - d. Utilities for sampling and testing equipment.

[Regulation 19, §19.702 and/or Regulation 18, §18.1002 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
5. The permittee must operate the equipment, control apparatus and emission monitoring equipment within the design limitations. The permittee shall maintain the equipment in good condition at all times. [Regulation 19, §19.303 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
6. This permit subsumes and incorporates all previously issued air permits for this facility. [Regulation 26 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

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Title VI Provisions

7. The permittee must comply with the standards for labeling of products using ozone-depleting substances. [40 CFR Part 82, Subpart E]
 - a. All containers containing a class I or class II substance stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced to interstate commerce pursuant to §82.106.
 - b. The placement of the required warning statement must comply with the requirements pursuant to §82.108.
 - c. The form of the label bearing the required warning must comply with the requirements pursuant to §82.110.
 - d. No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
8. The permittee must comply with the standards for recycling and emissions reduction, except as provided for MVACs in Subpart B. [40 CFR Part 82, Subpart F]
 - a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
 - b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
 - c. Persons performing maintenance, service repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
 - d. Persons disposing of small appliances, MVACs, and MVAC like appliances must comply with record keeping requirements pursuant to §82.166. ("MVAC like appliance" as defined at §82.152)
 - e. Persons owning commercial or industrial process refrigeration equipment must comply with leak repair requirements pursuant to §82.156.
 - f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
9. If the permittee manufactures, transforms, destroys, imports, or exports a class I or class II substance, the permittee is subject to all requirements as specified in 40 CFR Part 82, Subpart A, Production and Consumption Controls.
10. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

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The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air tight sealed refrigeration system used as refrigerated cargo, or the system used on passenger buses using HCFC 22 refrigerant.

11. The permittee can switch from any ozone depleting substance to any alternative listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR Part 82, Subpart G.

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SECTION VII: INSIGNIFICANT ACTIVITIES

The following sources are insignificant activities. Any activity that has a state or federal applicable requirement shall be considered a significant activity even if this activity meets the criteria of §26.304 of Regulation 26 or listed in the table below. Insignificant activity determinations rely upon the information submitted by the permittee in applications received on December 13, 2007 and February 10, 2010 and on correspondence received on February 8, 2008; March 20, 2008; April 11, 2008; and May 5, 2008.

Description	Category
Natural Gas Fired Space Heating	B-2
HVAC Sources	B-2
Air Conditioning Units	B-2
UV Coatings	No emissions. No regulated air pollutants.
Prepress Area Sources: Two Film Processors, Two Plate Processors, One Preheat Oven, One Postbake Oven, One Blueline Developer	No emissions. All vent inside and not to the atmosphere.
One 30,000 gallon LP Storage Tank	A-13
Various Maintenance and Parts Cleaning Operations which use Miscellaneous Cleaners throughout the Facility	No emissions. All vent inside and not to the atmosphere.
One 2,585 gallon Naphthalene Storage Tank	A-3
Seven Cooling Towers	A-13

SECTION VIII: GENERAL PROVISIONS

1. Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.) as the sole origin of and authority for the terms or conditions are not required under the Clean Air Act or any of its applicable requirements, and are not federally enforceable under the Clean Air Act. Arkansas Pollution Control & Ecology Commission Regulation 18 was adopted pursuant to the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.). Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute. [40 CFR 70.6(b)(2)]
2. This permit shall be valid for a period of five (5) years beginning on the date this permit becomes effective and ending five (5) years later. [40 CFR 70.6(a)(2) and §26.701(B) of the Regulations of the Arkansas Operating Air Permit Program (Regulation 26)]
3. The permittee must submit a complete application for permit renewal at least six (6) months before permit expiration. Permit expiration terminates the permittee's right to operate unless the permittee submitted a complete renewal application at least six (6) months before permit expiration. If the permittee submits a complete application, the existing permit will remain in effect until the Department takes final action on the renewal application. The Department will not necessarily notify the permittee when the permit renewal application is due. [Regulation 26, §26.406]
4. Where an applicable requirement of the Clean Air Act, as amended, 42 U.S.C. 7401, et seq. (Act) is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, the permit incorporates both provisions into the permit, and the Director or the Administrator can enforce both provisions. [40 CFR 70.6(a)(1)(ii) and Regulation 26, §26.701(A)(2)]
5. The permittee must maintain the following records of monitoring information as required by this permit.
 - a. The date, place as defined in this permit, and time of sampling or measurements;
 - b. The date(s) analyses performed;
 - c. The company or entity performing the analyses;
 - d. The analytical techniques or methods used;
 - e. The results of such analyses; and
 - f. The operating conditions existing at the time of sampling or measurement.

[40 CFR 70.6(a)(3)(ii)(A) and Regulation 26, §26.701(C)(2)]

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6. The permittee must retain the records of all required monitoring data and support information for at least five (5) years from the date of the 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 this permit. [40 CFR 70.6(a)(3)(ii)(B) and Regulation 26, §26.701(C)(2)(b)]
7. The permittee must submit reports of all required monitoring every six (6) months. If permit establishes no other reporting period, the reporting period shall end on the last day of the anniversary month of the initial Title V permit. The report is due within thirty (30) days of the end of the reporting period. Although the reports are due every six months, each report shall contain a full year of data. The report must clearly identify all instances of deviations from permit requirements. A responsible official as defined in Regulation No. 26, §26.2 must certify all required reports. The permittee will send the reports to the address below:

Arkansas Department of Environmental Quality
Air Division
ATTN: Compliance Inspector Supervisor
5301 Northshore Drive
North Little Rock, AR 72118-5317

[40 C.F.R. 70.6(a)(3)(iii)(A) and Regulation 26, §26.701(C)(3)(a)]

8. The permittee shall report to the Department all deviations from permit requirements, including those attributable to upset conditions as defined in the permit.
 - a. For all upset conditions (as defined in Regulation 19, § 19.601), the permittee will make an initial report to the Department by the next business day after the discovery of the occurrence. The initial report may be made by telephone and shall include:
 - i. The facility name and location;
 - ii. The process unit or emission source deviating from the permit limit;
 - iii. The permit limit, including the identification of pollutants, from which deviation occurs;
 - iv. The date and time the deviation started;
 - v. The duration of the deviation;
 - vi. The average emissions during the deviation;
 - vii. The probable cause of such deviations;
 - viii. Any corrective actions or preventive measures taken or being taken to prevent such deviations in the future; and
 - ix. The name of the person submitting the report.

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The permittee shall make a full report in writing to the Department within five (5) business days of discovery of the occurrence. The report must include, in addition to the information required by the initial report, a schedule of actions taken or planned to eliminate future occurrences and/or to minimize the amount the permit's limits were exceeded and to reduce the length of time the limits were exceeded. The permittee may submit a full report in writing (by facsimile, overnight courier, or other means) by the next business day after discovery of the occurrence, and the report will serve as both the initial report and full report.

- b. For all deviations, the permittee shall report such events in semi-annual reporting and annual certifications required in this permit. This includes all upset conditions reported in 8a above. The semi-annual report must include all the information as required by the initial and full reports required in 8a.

[Regulation 19, §19.601 and §19.602, Regulation 26, §26.701(C)(3)(b), and 40 CFR 70.6(a)(3)(iii)(B)]

9. If any provision of the permit or the application thereof to any person or circumstance is held invalid, such invalidity will not affect other provisions or applications hereof which can be given effect without the invalid provision or application, and to this end, provisions of this Regulation are declared to be separable and severable. [40 CFR 70.6(a)(5), Regulation 26, §26.701(E), and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
10. The permittee must comply with all conditions of this Part 70 permit. Any permit noncompliance with applicable requirements as defined in Regulation 26 constitutes a violation of the Clean Air Act, as amended, 42 U.S.C. §7401, et seq. and is grounds for enforcement action; for permit termination, revocation and reissuance, for permit modification; or for denial of a permit renewal application. [40 CFR 70.6(a)(6)(i) and Regulation 26, §26.701(F)(1)]
11. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity to maintain compliance with the conditions of this permit. [40 CFR 70.6(a)(6)(ii) and Regulation 26, §26.701(F)(2)]
12. The Department may modify, revoke, reopen and reissue the permit or terminate the permit for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [40 CFR 70.6(a)(6)(iii) and Regulation 26, §26.701(F)(3)]
13. This permit does not convey any property rights of any sort, or any exclusive privilege. [40 CFR 70.6(a)(6)(iv) and Regulation 26, §26.701(F)(4)]

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14. The permittee must furnish to the Director, within the time specified by the Director, any information that the Director 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 must also furnish to the Director copies of records required by the permit. For information the permittee claims confidentiality, the Department may require the permittee to furnish such records directly to the Director along with a claim of confidentiality. [40 CFR 70.6(a)(6)(v) and Regulation 26, §26.701(F)(5)]
15. The permittee must pay all permit fees in accordance with the procedures established in Regulation 9. [40 CFR 70.6(a)(7) and Regulation 26, §26.701(G)]
16. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes provided for elsewhere in this permit. [40 CFR 70.6(a)(8) and Regulation 26, §26.701(H)]
17. If the permit allows different operating scenarios, the permittee shall, contemporaneously with making a change from one operating scenario to another, record in a log at the permitted facility a record of the operational scenario. [40 CFR 70.6(a)(9)(i) and Regulation 26, §26.701(I)(1)]
18. The Administrator and citizens may enforce under the Act all terms and conditions in this permit, including any provisions designed to limit a source's potential to emit, unless the Department specifically designates terms and conditions of the permit as being federally unenforceable under the Act or under any of its applicable requirements. [40 CFR 70.6(b) and Regulation 26, §26.702(A) and (B)]
19. Any document (including reports) required by this permit must contain a certification by a responsible official as defined in Regulation 26, §26.2. [40 CFR 70.6(c)(1) and Regulation 26, §26.703(A)]
20. The permittee must allow an authorized representative of the Department, upon presentation of credentials, to perform the following: [40 CFR 70.6(c)(2) and Regulation 26, §26.703(B)]
 - a. Enter upon the permittee's premises where the permitted 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 required under the conditions of this permit;
 - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and

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- d. As authorized by the Act, sample or monitor at reasonable times substances or parameters for assuring compliance with this permit or applicable requirements.
21. The permittee shall submit a compliance certification with the terms and conditions contained in the permit, including emission limitations, standards, or work practices. The permittee must submit the compliance certification annually within 30 days following the last day of the anniversary month of the initial Title V permit. The permittee must also submit the compliance certification to the Administrator as well as to the Department. All compliance certifications required by this permit must include the following: [40 CFR 70.6(c)(5) and Regulation 26, §26.703(E)(3)]
 - a. The identification of each term or condition of the permit that is the basis of the certification;
 - b. The compliance status;
 - c. Whether compliance was continuous or intermittent;
 - d. The method(s) used for determining the compliance status of the source, currently and over the reporting period established by the monitoring requirements of this permit; and
 - e. Such other facts as the Department may require elsewhere in this permit or by §114(a)(3) and §504(b) of the Act.
22. Nothing in this permit will alter or affect the following: [Regulation 26, §26.704(C)]
 - a. The provisions of Section 303 of the Act (emergency orders), including the authority of the Administrator under that section;
 - b. The liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance;
 - c. The applicable requirements of the acid rain program, consistent with §408(a) of the Act; or
 - d. The ability of EPA to obtain information from a source pursuant to §114 of the Act.
23. This permit authorizes only those pollutant emitting activities addressed in this permit. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
24. The permittee may request in writing and at least 15 days in advance of the deadline, an extension to any testing, compliance or other dates in this permit. No such extensions are authorized until the permittee receives written Department approval. The Department may grant such a request, at its discretion in the following circumstances:
 - a. Such an extension does not violate a federal requirement;
 - b. The permittee demonstrates the need for the extension; and
 - c. The permittee documents that all reasonable measures have been taken to meet the current deadline and documents reasons it cannot be met.

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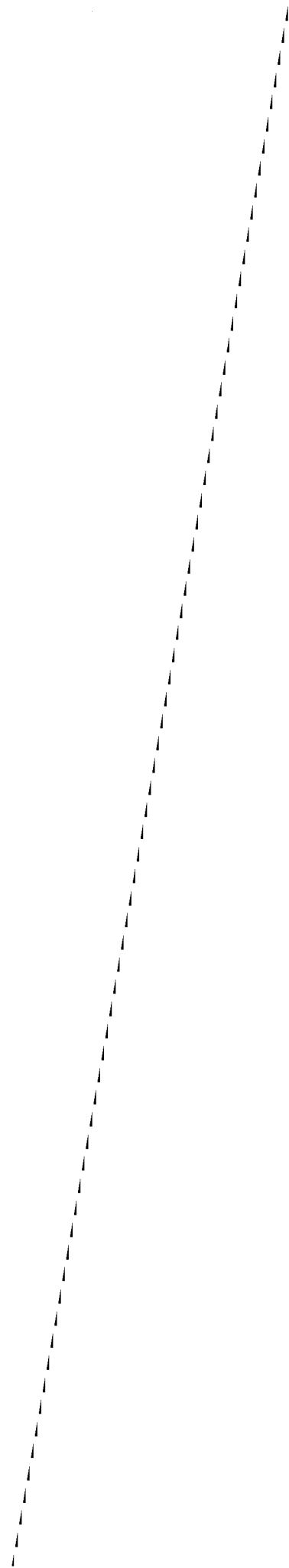
[Regulation 18, §18.314(A), Regulation 19, §19.416(A), Regulation 26, §26.1013(A), A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E]

25. The permittee may request in writing and at least 30 days in advance, temporary emissions and/or testing that would otherwise exceed an emission rate, throughput requirement, or other limit in this permit. No such activities are authorized until the permittee receives written Department approval. Any such emissions shall be included in the facility's total emissions and reported as such. The Department may grant such a request, at its discretion under the following conditions:
- a. Such a request does not violate a federal requirement;
 - b. Such a request is temporary in nature;
 - c. Such a request will not result in a condition of air pollution;
 - d. The request contains such information necessary for the Department to evaluate the request, including but not limited to, quantification of such emissions and the date/time such emission will occur;
 - e. Such a request will result in increased emissions less than five tons of any individual criteria pollutant, one ton of any single HAP and 2.5 tons of total HAPs; and
 - f. The permittee maintains records of the dates and results of such temporary emissions/testing.

[Regulation 18, §18.314(B), Regulation 19, §19.416(B), Regulation 26, §26.1013(B), A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E]

26. The permittee may request in writing and at least 30 days in advance, an alternative to the specified monitoring in this permit. No such alternatives are authorized until the permittee receives written Department approval. The Department may grant such a request, at its discretion under the following conditions:
- a. The request does not violate a federal requirement;
 - b. The request provides an equivalent or greater degree of actual monitoring to the current requirements; and
 - c. Any such request, if approved, is incorporated in the next permit modification application by the permittee.

[Regulation 18, §18.314(C), Regulation 19, §19.416(C), Regulation 26, §26.1013(C), A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E]



Appendix A: 40 CFR Part 64—*Compliance Assurance Monitoring*

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PART 64—COMPLIANCE ASSURANCE MONITORING

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Authority: 42 U.S.C. 7414 and 7661–7661f.

Source: 62 FR 54940, Oct. 22, 1997, unless otherwise noted.

§ 64.1 Definitions.



The following definitions apply to this part. Except as specifically provided in this section, terms used in this part retain the meaning accorded them under the applicable provisions of the Act.

Act means the Clean Air Act, as amended by Pub.L. 101–549, 42 U.S.C. 7401, *et seq.*

Applicable requirement shall have the same meaning as provided under part 70 of this chapter.

Capture system means the equipment (including but not limited to hoods, ducts, fans, and booths) used to contain, capture and transport a pollutant to a control device.

Continuous compliance determination method means a method, specified by the applicable standard or an applicable permit condition, which:

(1) Is used to determine compliance with an emission limitation or standard on a continuous basis, consistent with the averaging

period established for the emission limitation or standard; and

(2) Provides data either in units of the standard or correlated directly with the compliance limit.

Control device means equipment, other than inherent process equipment, that is used to destroy or remove air pollutant(s) prior to discharge to the atmosphere. The types of equipment that may commonly be used as control devices include, but are not limited to, fabric filters, mechanical collectors, electrostatic precipitators, inertial separators, afterburners, thermal or catalytic incinerators, adsorption devices (such as carbon beds), condensers, scrubbers (such as wet collection and gas absorption devices), selective catalytic or non-catalytic reduction systems, flue gas recirculation systems, spray dryers, spray towers, mist eliminators, acid plants, sulfur recovery plants, injection systems (such as water, steam, ammonia, sorbent or limestone injection), and combustion devices independent of the particular process being conducted at an emissions unit (e.g., the destruction of emissions achieved by venting process emission streams to flares, boilers or process heaters). For purposes of this part, a control device does not include passive control measures that act to prevent pollutants from forming, such as the use of seals, lids, or roofs to prevent the release of pollutants, use of low-polluting fuel or feedstocks, or the use of combustion or other process design features or characteristics. If an applicable requirement establishes that particular equipment which otherwise meets this definition of a control device does not constitute a control device as applied to a particular pollutant-specific emissions unit, then that definition shall be binding for purposes of this part.

Data means the results of any type of monitoring or method, including the results of instrumental or non-instrumental monitoring, emission calculations, manual sampling procedures, recordkeeping procedures, or any other form of information collection procedure used in connection with any type of monitoring or method.

Emission limitation or standard means any applicable requirement that constitutes an emission limitation, emission standard, standard of performance or means of emission limitation as defined under the Act. An emission limitation or standard may be expressed in terms of the pollutant, expressed either as a specific quantity, rate or concentration of emissions (e.g., pounds of SO₂ per hour, pounds of SO₂ per million British thermal units of fuel input, kilograms of VOC per liter of applied coating solids, or parts per million by volume of SO₂) or as the relationship of uncontrolled to controlled emissions (e.g., percentage capture and destruction efficiency of VOC or percentage reduction of SO₂). An emission limitation or standard may also be expressed either as a work practice, process or control device parameter, or other form of specific design, equipment, operational, or operation and maintenance requirement. For purposes of this part, an emission limitation or standard shall not include general operation requirements that an owner or operator may be required to meet, such as requirements to obtain a permit, to operate and maintain sources in accordance with good air pollution control practices, to develop and maintain a malfunction abatement plan, to keep records, submit reports, or conduct monitoring.

Emissions unit shall have the same meaning as provided under part 70 of this chapter.

Exceedance shall mean a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of a percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.

Excursion shall mean a departure from an indicator range established for monitoring under this part, consistent with any averaging period specified for averaging the results of the monitoring.

Inherent process equipment means equipment that is necessary for the proper or safe functioning of the process, or material recovery equipment that the owner or operator documents is installed and operated primarily for purposes other than compliance with air pollution regulations. Equipment that must be operated at an efficiency higher than that achieved during normal process operations in order to comply with the applicable emission limitation or standard is not inherent process equipment. For the purposes of this part, inherent process equipment is not considered a control device.

Major source shall have the same meaning as provided under part 70 or 71 of this chapter.

Monitoring means any form of collecting data on a routine basis to determine or otherwise assess compliance with emission limitations or standards. Recordkeeping may be considered monitoring where such records are used to determine or assess compliance with an emission limitation or standard (such as records of raw material content and usage, or records documenting compliance with work practice requirements). The conduct of compliance method tests, such as the procedures in appendix A to part 60 of this chapter, on a routine periodic basis may be considered monitoring (or as a supplement to other monitoring), provided that requirements to conduct such tests on a one-time basis or at such times as a regulatory authority may require on a non-regular basis are not considered monitoring requirements for purposes of this paragraph. Monitoring may include one or more than one of the following data collection techniques, where appropriate for a particular circumstance:

(1) Continuous emission or opacity monitoring systems.

(2) Continuous process, capture system, control device or other relevant parameter monitoring systems or procedures, including a predictive emission monitoring system.

(3) Emission estimation and calculation procedures (e.g., mass balance or stoichiometric calculations).

- (4) Maintenance and analysis of records of fuel or raw materials usage.
- (5) Recording results of a program or protocol to conduct specific operation and maintenance procedures.
- (6) Verification of emissions, process parameters, capture system parameters, or control device parameters using portable or in situ measurement devices.
- (7) Visible emission observations.
- (8) Any other form of measuring, recording, or verifying on a routine basis emissions, process parameters, capture system parameters, control device parameters or other factors relevant to assessing compliance with emission limitations or standards.

Owner or operator means any person who owns, leases, operates, controls or supervises a stationary source subject to this part.

Part 70 or 71 permit shall have the same meaning as provided under part 70 or 71 of this chapter, provided that it shall also refer to a permit issued, renewed, amended, revised, or modified under any federal permit program promulgated under title V of the Act.

Part 70 or 71 permit application shall mean an application (including any supplement to a previously submitted application) that is submitted by the owner or operator in order to obtain a part 70 or 71 permit.

Permitting authority shall have the same meaning as provided under part 70 or 71 of this chapter.

Pollutant-specific emissions unit means an emissions unit considered separately with respect to each regulated air pollutant.

Potential to emit shall have the same meaning as provided under part 70 or 71 of this chapter, provided that it shall be applied with respect to an "emissions unit" as defined under this part in addition to a "stationary source" as provided under part 70 or 71 of this chapter.

Predictive emission monitoring system (PEMS) means a system that uses process and other parameters as inputs to a computer program or other data reduction system to produce values in terms of the applicable emission limitation or standard.

Regulated air pollutant shall have the same meaning as provided under part 70 or 71 of this chapter.

§ 64.2 Applicability.



(a) *General applicability.* Except for backup utility units that are exempt under paragraph (b)(2) of this section, the requirements of this part shall apply to a pollutant-specific emissions unit at a major source that is required to obtain a part 70 or 71 permit if the unit satisfies all of the following criteria:

- (1) The unit is subject to an emission limitation or standard for the applicable regulated air pollutant (or a surrogate thereof), other than an emission limitation or standard that is exempt under paragraph (b)(1) of this section;
- (2) The unit uses a control device to achieve compliance with any such emission limitation or standard; and
- (3) The unit has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source. For purposes of this paragraph, "potential pre-control device emissions" shall have the same meaning as "potential to emit," as defined in §64.1, except that emission reductions achieved by the applicable control device shall not be taken into account.

(b) *Exemptions* —(1) *Exempt emission limitations or standards.* The requirements of this part shall not apply to any of the following emission limitations or standards:

- (i) Emission limitations or standards proposed by the Administrator after November 15, 1990 pursuant to section 111 or 112 of the Act.
- (ii) Stratospheric ozone protection requirements under title VI of the Act.
- (iii) Acid Rain Program requirements pursuant to sections 404, 405, 406, 407(a), 407(b), or 410 of the Act.

(iv) Emission limitations or standards or other applicable requirements that apply solely under an emissions trading program approved or promulgated by the Administrator under the Act that allows for trading emissions within a source or between sources.

(v) An emissions cap that meets the requirements specified in §70.4(b)(12) or §71.6(a)(13)(iii) of this chapter.

(vi) Emission limitations or standards for which a part 70 or 71 permit specifies a continuous compliance determination method, as defined in §64.1. The exemption provided in this paragraph (b)(1)(vi) shall not apply if the applicable compliance method includes an assumed control device emission reduction factor that could be affected by the actual operation and maintenance of the control device (such as a surface coating line controlled by an incinerator for which continuous compliance is determined by calculating emissions on the basis of coating records and an assumed control device efficiency factor based on an initial performance test; in this example, this part would apply to the control device and capture system, but not to the remaining elements of the coating line, such as raw material usage).

(2) *Exemption for backup utility power emissions units.* The requirements of this part shall not apply to a utility unit, as defined in §72.2 of this chapter, that is municipally-owned if the owner or operator provides documentation in a part 70 or 71 permit application that:

(i) The utility unit is exempt from all monitoring requirements in part 75 (including the appendices thereto) of this chapter;

(ii) The utility unit is operated for the sole purpose of providing electricity during periods of peak electrical demand or emergency situations and will be operated consistent with that purpose throughout the part 70 or 71 permit term. The owner or operator shall provide historical operating data and relevant contractual obligations to document that this criterion is satisfied; and

(iii) The actual emissions from the utility unit, based on the average annual emissions over the last three calendar years of operation (or such shorter time period that is available for units with fewer than three years of operation) are less than 50 percent of the amount in tons per year required for a source to be classified as a major source and are expected to remain so.

§ 64.3 Monitoring design criteria.



(a) *General criteria.* To provide a reasonable assurance of compliance with emission limitations or standards for the anticipated range of operations at a pollutant-specific emissions unit, monitoring under this part shall meet the following general criteria:

(1) The owner or operator shall design the monitoring to obtain data for one or more indicators of emission control performance for the control device, any associated capture system and, if necessary to satisfy paragraph (a)(2) of this section, processes at a pollutant-specific emissions unit. Indicators of performance may include, but are not limited to, direct or predicted emissions (including visible emissions or opacity), process and control device parameters that affect control device (and capture system) efficiency or emission rates, or recorded findings of inspection and maintenance activities conducted by the owner or operator.

(2) The owner or operator shall establish an appropriate range(s) or designated condition(s) for the selected indicator(s) such that operation within the ranges provides a reasonable assurance of ongoing compliance with emission limitations or standards for the anticipated range of operating conditions. Such range(s) or condition(s) shall reflect the proper operation and maintenance of the control device (and associated capture system), in accordance with applicable design properties, for minimizing emissions over the anticipated range of operating conditions at least to the level required to achieve compliance with the applicable requirements. The reasonable assurance of compliance will be assessed by maintaining performance within the indicator range(s) or designated condition(s). The ranges shall be established in accordance with the design and performance requirements in this section and documented in accordance with the requirements in §64.4. If necessary to assure that the control device and associated capture system can satisfy this criterion, the owner or operator shall monitor appropriate process operational parameters (such as total throughput where necessary to stay within the rated capacity for a control device). In addition, unless specifically stated otherwise by an applicable requirement, the owner or operator shall monitor indicators to detect any bypass of the control device (or capture system) to the atmosphere, if such bypass can occur based on the design of the pollutant-specific emissions unit.

(3) The design of indicator ranges or designated conditions may be:

(i) Based on a single maximum or minimum value if appropriate (e.g., maintaining condenser temperatures a certain number of degrees below the condensation temperature of the applicable compound(s) being processed) or at multiple levels that are relevant to distinctly different operating conditions (e.g., high versus low load levels).

(ii) Expressed as a function of process variables (e.g., an indicator range expressed as minimum to maximum pressure drop across a venturi throat in a particulate control scrubber).

(iii) Expressed as maintaining the applicable parameter in a particular operational status or designated condition (e.g., position of a damper controlling gas flow to the atmosphere through a by-pass duct).

(iv) Established as interdependent between more than one indicator.

(b) *Performance criteria.* The owner or operator shall design the monitoring to meet the following performance criteria:

(1) Specifications that provide for obtaining data that are representative of the emissions or parameters being monitored (such as detector location and installation specifications, if applicable).

(2) For new or modified monitoring equipment, verification procedures to confirm the operational status of the monitoring prior to the date by which the owner or operator must conduct monitoring under this part as specified in §64.7(a). The owner or operator shall consider the monitoring equipment manufacturer's requirements or recommendations for installation, calibration, and start-up operation.

(3) Quality assurance and control practices that are adequate to ensure the continuing validity of the data. The owner or operator shall consider manufacturer recommendations or requirements applicable to the monitoring in developing appropriate quality assurance and control practices.

(4) Specifications for the frequency of conducting the monitoring, the data collection procedures that will be used (e.g., computerized data acquisition and handling, alarm sensor, or manual log entries based on gauge readings), and, if applicable, the period over which discrete data points will be averaged for the purpose of determining whether an excursion or exceedance has occurred.

(i) At a minimum, the owner or operator shall design the period over which data are obtained and, if applicable, averaged consistent with the characteristics and typical variability of the pollutant-specific emissions unit (including the control device and associated capture system). Such intervals shall be commensurate with the time period over which a change in control device performance that would require actions by owner or operator to return operations within normal ranges or designated conditions is likely to be observed.

(ii) For all pollutant-specific emissions units with the potential to emit, calculated *including* the effect of control devices, the applicable regulated air pollutant in an amount equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source, for each parameter monitored, the owner or operator shall collect four or more data values equally spaced over each hour and average the values, as applicable, over the applicable averaging period as determined in accordance with paragraph (b)(4)(i) of this section. The permitting authority may approve a reduced data collection frequency, if appropriate, based on information presented by the owner or operator concerning the data collection mechanisms available for a particular parameter for the particular pollutant-specific emissions unit (e.g., integrated raw material or fuel analysis data, noninstrumental measurement of waste feed rate or visible emissions, use of a portable analyzer or an alarm sensor).

(iii) For other pollutant-specific emissions units, the frequency of data collection may be less than the frequency specified in paragraph (b)(4)(ii) of this section but the monitoring shall include some data collection at least once per 24-hour period (e.g., a daily inspection of a carbon adsorber operation in conjunction with a weekly or monthly check of emissions with a portable analyzer).

(c) *Evaluation factors.* In designing monitoring to meet the requirements in paragraphs (a) and (b) of this section, the owner or operator shall take into account site-specific factors including the applicability of existing monitoring equipment and procedures, the ability of the monitoring to account for process and control device operational variability, the reliability and latitude built into the control technology, and the level of actual emissions relative to the compliance limitation.

(d) *Special criteria for the use of continuous emission, opacity or predictive monitoring systems.* (1) If a continuous emission monitoring system (CEMS), continuous opacity monitoring system (COMS) or predictive emission monitoring system (PEMS) is required pursuant to other authority under the Act or state or local law, the owner or operator shall use such system to satisfy the requirements of this part.

(2) The use of a CEMS, COMS, or PEMS that satisfies any of the following monitoring requirements shall be deemed to satisfy the general design criteria in paragraphs (a) and (b) of this section, provided that a COMS may be subject to the criteria for establishing indicator ranges under paragraph (a) of this section:

(i) Section 51.214 and appendix P of part 51 of this chapter;

(ii) Section 60.13 and appendix B of part 60 of this chapter;

(iii) Section 63.8 and any applicable performance specifications required pursuant to the applicable subpart of part 63 of this chapter;

(iv) Part 75 of this chapter;

(v) Subpart H and appendix IX of part 266 of this chapter; or

(vi) If an applicable requirement does not otherwise require compliance with the requirements listed in the preceding paragraphs (d)(2)(i) through (v) of this section, comparable requirements and specifications established by the permitting authority.

(3) The owner or operator shall design the monitoring system subject to this paragraph (d) to:

(i) Allow for reporting of exceedances (or excursions if applicable to a COMS used to assure compliance with a particulate matter standard), consistent with any period for reporting of exceedances in an underlying requirement. If an underlying requirement does not contain a provision for establishing an averaging period for the reporting of exceedances or excursions, the criteria used to develop an averaging period in (b)(4) of this section shall apply; and

(ii) Provide an indicator range consistent with paragraph (a) of this section for a COMS used to assure compliance with a particulate matter standard. If an opacity standard applies to the pollutant-specific emissions unit, such limit may be used as the appropriate indicator range unless the opacity limit fails to meet the criteria in paragraph (a) of this section after considering the type of control device and other site-specific factors applicable to the pollutant-specific emissions unit.

§ 64.4 Submittal requirements.



(a) The owner or operator shall submit to the permitting authority monitoring that satisfies the design requirements in §64.3. The submission shall include the following information:

(1) The indicators to be monitored to satisfy §§64.3(a)(1)-(2);

(2) The ranges or designated conditions for such indicators, or the process by which such indicator ranges or designated conditions shall be established;

(3) The performance criteria for the monitoring to satisfy §64.3(b); and

(4) If applicable, the indicator ranges and performance criteria for a CEMS, COMS or PEMS pursuant to §64.3(d).

(b) As part of the information submitted, the owner or operator shall submit a justification for the proposed elements of the monitoring. If the performance specifications proposed to satisfy §64.3(b)(2) or (3) include differences from manufacturer recommendations, the owner or operator shall explain the reasons for the differences between the requirements proposed by the owner or operator and the manufacturer's recommendations or requirements. The owner or operator also shall submit any data supporting the justification, and may refer to generally available sources of information used to support the justification (such as generally available air pollution engineering manuals, or EPA or permitting authority publications on appropriate monitoring for various types of control devices or capture systems). To justify the appropriateness of the monitoring elements proposed, the owner or operator may rely in part on existing applicable requirements that establish the monitoring for the applicable pollutant-specific emissions unit or a similar unit. If an owner or operator relies on presumptively acceptable monitoring, no further justification for the appropriateness of that monitoring should be necessary other than an explanation of the applicability of such monitoring to the unit in question, unless data or information is brought forward to rebut the assumption. Presumptively acceptable monitoring includes:

(1) Presumptively acceptable or required monitoring approaches, established by the permitting authority in a rule that constitutes part of the applicable implementation plan required pursuant to title I of the Act, that are designed to achieve compliance with this part for particular pollutant-specific emissions units;

(2) Continuous emission, opacity or predictive emission monitoring systems that satisfy applicable monitoring requirements and performance specifications as specified in §64.3(d);

(3) Excepted or alternative monitoring methods allowed or approved pursuant to part 75 of this chapter;

(4) Monitoring included for standards exempt from this part pursuant to §64.2(b)(1)(i) or (vi) to the extent such monitoring is applicable to the performance of the control device (and associated capture system) for the pollutant-specific emissions unit; and

(5) Presumptively acceptable monitoring identified in guidance by EPA. Such guidance will address the requirements under §64.4 (a), (b), and (c) to the extent practicable.

(c)(1) Except as provided in paragraph (d) of this section, the owner or operator shall submit control device (and process and capture system, if applicable) operating parameter data obtained during the conduct of the applicable compliance or performance test conducted under conditions specified by the applicable rule. If the applicable rule does not specify testing conditions or only partially specifies test conditions, the performance test generally shall be conducted under conditions representative of maximum emissions potential under anticipated operating conditions at the pollutant-specific emissions unit. Such data may be supplemented, if desired, by engineering assessments and manufacturer's recommendations to justify the indicator ranges (or, if applicable, the procedures for establishing such indicator ranges). Emission testing is not required to be conducted over the entire indicator range or range of potential emissions.

(2) The owner or operator must document that no changes to the pollutant-specific emissions unit, including the control device and capture system, have taken place that could result in a significant change in the control system performance or the selected ranges or designated conditions for the indicators to be monitored since the performance or compliance tests were conducted.

(d) If existing data from unit-specific compliance or performance testing specified in paragraph (c) of this section are not available, the owner or operator:

(1) Shall submit a test plan and schedule for obtaining such data in accordance with paragraph (e) of this section; or

(2) May submit indicator ranges (or procedures for establishing indicator ranges) that rely on engineering assessments and other data, provided that the owner or operator demonstrates that factors specific to the type of monitoring, control device, or pollutant-specific emissions unit make compliance or performance testing unnecessary to establish indicator ranges at levels that satisfy the criteria in §64.3(a).

(e) If the monitoring submitted by the owner or operator requires installation, testing, or other necessary activities prior to use of the monitoring for purposes of this part, the owner or operator shall include an implementation plan and schedule for installing, testing and performing any other appropriate activities prior to use of the monitoring. The implementation plan and schedule shall provide for use of the monitoring as expeditiously as practicable after approval of the monitoring in the part 70 or 71 permit pursuant to §64.6, but in no case shall the schedule for completing installation and beginning operation of the monitoring exceed 180 days after approval of the permit.

(f) If a control device is common to more than one pollutant-specific emissions unit, the owner or operator may submit monitoring for the control device and identify the pollutant-specific emissions units affected and any process or associated capture device conditions that must be maintained or monitored in accordance with §64.3(a) rather than submit separate monitoring for each pollutant-specific emissions unit.

(g) If a single pollutant-specific emissions unit is controlled by more than one control device similar in design and operation, the owner or operator may submit monitoring that applies to all the control devices and identify the control devices affected and any process or associated capture device conditions that must be maintained or monitored in accordance with §64.3(a) rather than submit a separate description of monitoring for each control device.

§ 64.5 Deadlines for submittals.



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(a) *Large pollutant-specific emissions units.* For all pollutant-specific emissions units with the potential to emit (taking into account control devices to the extent appropriate under the definition of this term in §64.1) the applicable regulated air pollutant in an amount equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source, the owner or operator shall submit the information required under §64.4 at the following times:

(1) On or after April 20, 1998, the owner or operator shall submit information as part of an application for an initial part 70 or 71 permit if, by that date, the application is either:

(i) Has not been filed; or

(ii) Has not yet been determined to be complete by the permitting authority.

(2) On or after April 20, 1998, the owner or operator shall submit information as part of an application for a significant permit revision under part 70 or 71 of this chapter, but only with respect to those pollutant-specific emissions units for which the proposed permit revision is applicable.

(3) The owner or operator shall submit any information not submitted under the deadlines set forth in paragraphs (a)(1) and (2) of this section as part of the application for the renewal of a part 70 or 71 permit.

(b) *Other pollutant-specific emissions units.* For all other pollutant-specific emissions units subject to this part and not subject to §64.5(a), the owner or operator shall submit the information required under §64.4 as part of an application for a renewal of a part 70 or 71 permit.

(c) The effective date for the requirement to submit information under §64.4 shall be as specified pursuant to paragraphs (a)–(b) of this section and a permit reopening to require the submittal of information under this section shall not be required pursuant to §70.7(f)(1)(i) of this chapter, provided, however, that, if a part 70 or 71 permit is reopened for cause by EPA or the permitting authority pursuant to §70.7(f)(1)(iii) or (iv), or §71.7(f) or (g), the applicable agency may require the submittal of information under this section for those pollutant-specific emissions units that are subject to this part and that are affected by the permit reopening.

(d) Prior to approval of monitoring that satisfies this part, the owner or operator is subject to the requirements of §70.6(a)(3)(i)(B).

§ 64.6 Approval of monitoring.

(a) Based on an application that includes the information submitted in accordance with §64.5, the permitting authority shall act to approve the monitoring submitted by the owner or operator by confirming that the monitoring satisfies the requirements in §64.3.

(b) In approving monitoring under this section, the permitting authority may condition the approval on the owner or operator collecting additional data on the indicators to be monitored for a pollutant-specific emissions unit, including required compliance or performance testing, to confirm the ability of the monitoring to provide data that are sufficient to satisfy the requirements of this part and to confirm the appropriateness of an indicator range(s) or designated condition(s) proposed to satisfy §64.3(a)(2) and (3) and consistent with the schedule in §64.4(e).

(c) If the permitting authority approves the proposed monitoring, the permitting authority shall establish one or more permit terms or conditions that specify the required monitoring in accordance with §70.6(a)(3)(i) of this chapter. At a minimum, the permit shall specify:

(1) The approved monitoring approach that includes all of the following:

(i) The indicator(s) to be monitored (such as temperature, pressure drop, emissions, or similar parameter);

(ii) The means or device to be used to measure the indicator(s) (such as temperature measurement device, visual observation, or CEMS); and

(iii) The performance requirements established to satisfy §64.3(b) or (d), as applicable.

(2) The means by which the owner or operator will define an exceedance or excursion for purposes of responding to and reporting exceedances or excursions under §§64.7 and 64.8 of this part. The permit shall specify the level at which an excursion or exceedance will be deemed to occur, including the appropriate averaging period as associated with such exceedance or excursion. For defining an excursion from an indicator range or designated condition, the permit may either include the specific value(s) or condition(s) at which an excursion shall occur, or the specific procedures that will be used to establish that value or condition. If the latter, the permit shall specify appropriate notice procedures for the owner or operator to notify the permitting authority upon any establishment or reestablishment of the value.

(3) The obligation to conduct the monitoring and fulfill the other obligations specified in §§64.7 through 64.9 of this part.

(4) If appropriate, a minimum data availability requirement for valid data collection for each averaging period, and, if appropriate, a minimum data availability requirement for the averaging periods in a reporting period.

(d) If the monitoring proposed by the owner or operator requires installation, testing or final verification of operational status, the part 70 or 71 permit shall include an enforceable schedule with appropriate milestones for completing such installation, testing, or final verification consistent with the requirements in §64.4(e).

(e) If the permitting authority disapproves the proposed monitoring, the following applies:

(1) The draft or final permit shall include, at a minimum, monitoring that satisfies the requirements of §70.6(a)(3)(i)(B);

(2) The permitting authority shall include in the draft or final permit a compliance schedule for the source owner to submit monitoring that satisfies §§64.3 and 64.4, but in no case shall the owner or operator submit revised monitoring more than 180 days from the date of issuance of the draft or final permit; and

(3) If the source owner or operator does not submit the monitoring in accordance with the compliance schedule as required in paragraph (e)(2) of this section or if the permitting authority disapproves the monitoring submitted, the source owner or operator shall be deemed not in compliance with part 64, unless the source owner or operator successfully challenges the disapproval.

§ 64.7 Operation of approved monitoring.

(a) *Commencement of operation.* The owner or operator shall conduct the monitoring required under this part upon issuance of a part 70 or 71 permit that includes such monitoring, or by such later date specified in the permit pursuant to §64.6(d).

(b) *Proper maintenance.* At all times, the owner or operator shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

(c) *Continued operation.* Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

(d) *Response to excursions or exceedances.* (1) Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

(2) Determination of whether the owner or operator has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

(e) *Documentation of need for improved monitoring.* After approval of monitoring under this part, if the owner or operator identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the owner or operator shall promptly notify the permitting authority and, if necessary, submit a proposed modification to the part 70 or 71 permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

§ 64.8 Quality improvement plan (QIP) requirements.



(a) Based on the results of a determination made under §64.7(d)(2), the Administrator or the permitting authority may require the owner or operator to develop and implement a QIP. Consistent with §64.6(c)(3), the part 70 or 71 permit may specify an appropriate threshold, such as an accumulation of exceedances or excursions exceeding 5 percent duration of a pollutant-specific emissions unit's operating time for a reporting period, for requiring the implementation of a QIP. The threshold may be set at a higher or lower percent or may rely on other criteria for purposes of indicating whether a pollutant-specific emissions unit is being maintained and operated in a manner consistent with good air pollution control practices.

(b) Elements of a QIP:

(1) The owner or operator shall maintain a written QIP, if required, and have it available for inspection.

(2) The plan initially shall include procedures for evaluating the control performance problems and, based on the results of the evaluation procedures, the owner or operator shall modify the plan to include procedures for conducting one or more of the following actions, as appropriate:

(i) Improved preventive maintenance practices.

(ii) Process operation changes.

(iii) Appropriate improvements to control methods.

(iv) Other steps appropriate to correct control performance.

(v) More frequent or improved monitoring (only in conjunction with one or more steps under paragraphs (b)(2)(i) through (iv) of this section).

(c) If a QIP is required, the owner or operator shall develop and implement a QIP as expeditiously as practicable and shall notify

the permitting authority if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined.

(d) Following implementation of a QIP, upon any subsequent determination pursuant to §64.7(d)(2) the Administrator or the permitting authority may require that an owner or operator make reasonable changes to the QIP if the QIP is found to have:

- (1) Failed to address the cause of the control device performance problems; or
- (2) Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

(e) Implementation of a QIP shall not excuse the owner or operator of a source from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act.

§ 64.9 Reporting and recordkeeping requirements.



(a) *General reporting requirements.* (1) On and after the date specified in §64.7(a) by which the owner or operator must use monitoring that meets the requirements of this part, the owner or operator shall submit monitoring reports to the permitting authority in accordance with §70.6(a)(3)(iii) of this chapter.

(2) A report for monitoring under this part shall include, at a minimum, the information required under §70.6(a)(3)(iii) of this chapter and the following information, as applicable:

- (i) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;
- (ii) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and
- (iii) A description of the actions taken to implement a QIP during the reporting period as specified in §64.8. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

(b) *General recordkeeping requirements.* (1) The owner or operator shall comply with the recordkeeping requirements specified in §70.6(a)(3)(ii) of this chapter. The owner or operator shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to §64.8 and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this part (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions).

(2) Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements.

§ 64.10 Savings provisions.



(a) Nothing in this part shall:

(1) Excuse the owner or operator of a source from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act. The requirements of this part shall not be used to justify the approval of monitoring less stringent than the monitoring which is required under separate legal authority and are not intended to establish minimum requirements for the purpose of determining the monitoring to be imposed under separate authority under the Act, including monitoring in permits issued pursuant to title I of the Act. The purpose of this part is to require, as part of the issuance of a permit under title V of the Act, improved or new monitoring at those emissions units where monitoring requirements do not exist or are inadequate to meet the requirements of this part.

(2) Restrict or abrogate the authority of the Administrator or the permitting authority to impose additional or more stringent monitoring, recordkeeping, testing, or reporting requirements on any owner or operator of a source under any provision of the Act,

including but not limited to sections 114(a)(1) and 504 (b), or state law, as applicable.

(3) Restrict or abrogate the authority of the Administrator or permitting authority to take any enforcement action under the Act for any violation of an applicable requirement or of any person to take action under section 304 of the Act.

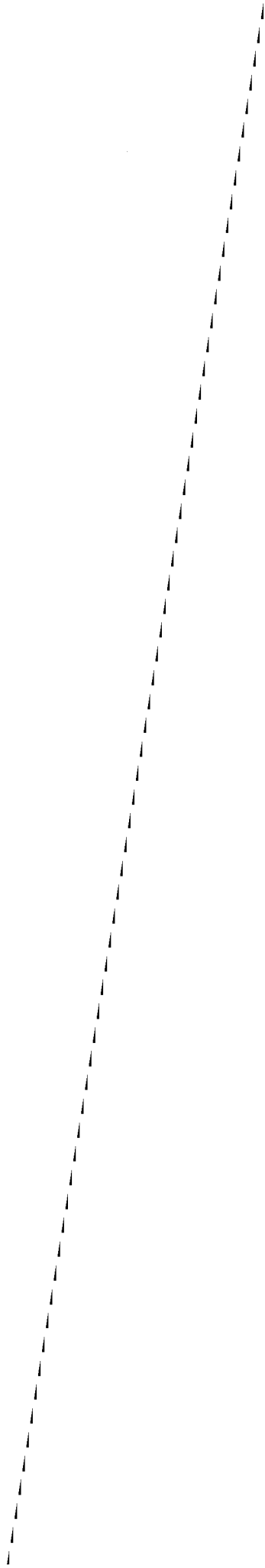
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Appendix B: Air Pollution Control System Contingency Plan



**Air Pollution Control System
Contingency Plan**

**Worldcolor Jonesboro Division
4708 Krueger Drive
Jonesboro, Arkansas 72401**

**Updated January 22, 2010
Original May 15, 2000**

1. INTRODUCTION

Worldcolor Jonesboro Division (Jonesboro) operates a heatset web offset printing facility and associated bindery operations. Printed materials include periodicals (monthly magazines) that must be delivered to customers on strictly adhered to schedules. An unexpected malfunction of the thermal oxidizer air pollution control system, because of the time sensitive nature of the materials printed by Jonesboro, may require unavoidable brief periods of uncontrolled press operation to meet delivery schedules. The following Contingency Plan was developed to reduce the likelihood of an oxidizer malfunction, shorten the outage time caused by an unexpected malfunction, and minimize the potential impact to health and the environment that could result from uncontrolled press operation.

2. AIR POLLUTION CONTROL SYSTEM MAINTENANCE

The Jonesboro facility will maintain and monitor the performance of the oxidizer system with the following inspection and maintenance schedule that exceeds the manufacturer recommendations.

1. A visual annunciation system to be installed in the maintenance department that will provide the following information:
 - a. Afterburner SN-18 Ready/Not Ready; and
 - b. Afterburner SN-23 Ready/Not Ready.

This system will confirm the operation of the oxidizer units. An emergency blue strobe light, located in the electric maintenance shop, will be triggered and locked in if either Afterburners are not ready, and a press is not being controlled for more than 30 minutes. The alarm system can only be silenced by a shift supervisor, through a key lock.

2. The oxidizer units will be added to the guard's key punch list, so that daily visual inspection can be monitored and confirmed.
3. One-day shift machinist will be assigned to visually inspect the mechanical condition of the unit on a weekly basis. This inspection will consist of the main blower bearings, fan, and the valve linkages to the system.
4. A monthly inspection of the control chart will be performed by a plant electrician to verify that the chart recorder is properly recording the information and that the system is running within normal operating ranges.
5. A semi-annual systems check will be performed by the manufacturer to verify correct operating controls. This check will be a running inspection.
6. An annual inspection will be performed by the manufacturer.

A copy of the maintenance report from each routine maintenance and repair activity will be maintained for a period of five years and, if requested, made available to the Arkansas Department of Environmental Quality (ADEQ). In addition, a spare parts inventory will be maintained on-site to facilitate oxidizer system repair and minimize system outage time.

3. MALFUNCTION IMPACT MINIMIZATION

In the event of a malfunction of one or both of the facility's thermal oxidizer air pollution control systems during press operations, Jonesboro will proceed with the following measures to minimize the impact of this occurrence. The following measures and actions assume that limited uncontrolled press operation will be allowed for a 72-hour period following the malfunction incident, if the procedures outlined below are utilized by the Jonesboro facility.

3.1. Immediately Following Malfunction

1. Complete safe shutdown of uncontrolled presses as soon as practical.
2. If applicable, start up of the non-operating control units.
3. Contact maintenance personnel and the control system supplier as appropriate to initiate problem identification and repair.
4. Evaluate production scheduling, the need to complete time sensitive publications, and the availability of controlled presses to complete critical printing jobs. Re-assign presses and printing jobs to maximize use of controlled presses to complete critical jobs.
5. If uncontrolled press operation is required, contact ADEQ¹ as soon as practical for notification of the incident and the need for uncontrolled operation of presses.
6. If uncontrolled press operation is not required, contact ADEQ¹ within 48-hours of oxidizer malfunction to report the incident.

3.2. Uncontrolled Press Operation: 24-Hour Period After Malfunction Occurrence

1. Expedite repair of the oxidizer system(s), using paid overtime for facility personnel, premium time for supplier's personnel, and rapid delivery of parts and supplies.
2. Develop, as soon as possible, an estimate of the expected duration of the malfunction outage. Communicate this schedule to ADEQ¹ and also notify ADEQ of the intent to operate certain critical presses uncontrolled to complete time sensitive printing.

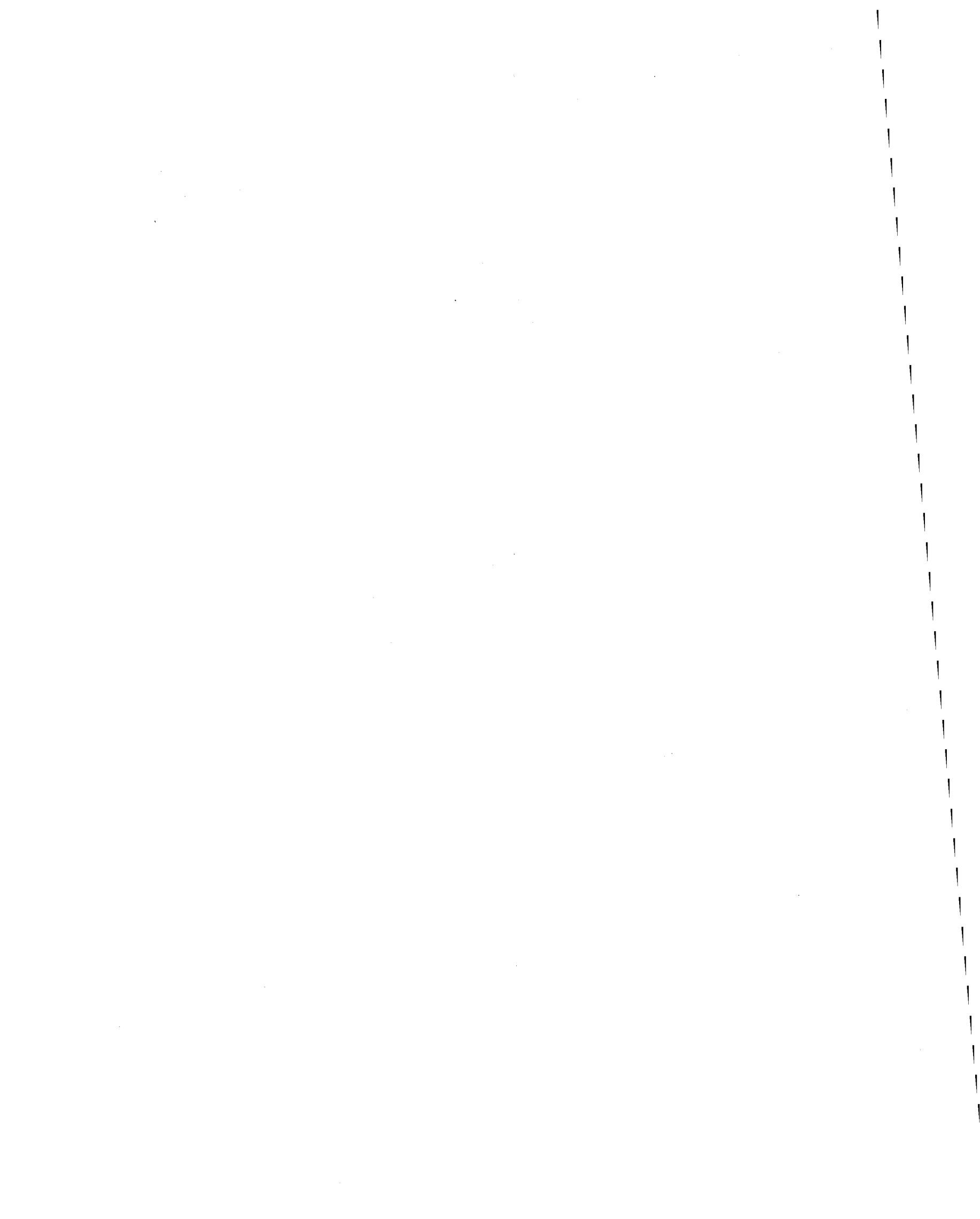
¹ ADEQ will be notified initially by telephone, if malfunction incident or the need for subsequent reporting occurs during normal ADEQ working hours. If a malfunction occurs outside of normal working hours, ADEQ will be notified by telephone, facsimile, and/or email. Written notification no later than the day following the upset condition will be provided in any event.

3. Refuse new printing work from other Worldcolor facilities that would require or increase the use of uncontrolled presses. Also, refuse new, non-contract work from customers.
4. Minimize, to the extent possible, the use of Volatile Organic Compound-containing clean-up materials.

3.3. Uncontrolled Press Operation: 24 to 72-Hour Period Following Malfunction Incident

In addition to the mitigating measures listed above, the Jonesboro Division will also take the following steps to reduce the potential impact of the malfunction incident.

1. Contact other Worldcolor facilities to determine if time-sensitive printing work can be completed at other locations and shift work from uncontrolled presses to other locations, if feasible.
2. Update the oxidizer repair schedule, based on the best information currently available. Communicate updated repair schedule to ADEQ, and notify ADEQ of the need to continue to operate certain presses uncontrolled to complete critical time sensitive printing.
3. Contact customers of printing work requiring uncontrolled press operation and explore the possibility of delivery delays to minimize uncontrolled operation time.



CERTIFICATE OF SERVICE

I, Pam Owen, hereby certify that a copy of this permit has been mailed by first class mail to

Worldcolor Jonesboro Division, 4708 Krueger Drive, Jonesboro, AR, 72401, on this

8 day of June, 2010.



Pam Owen, AAI, Air Division

