AIR AND RADIATION ADMINISTRATION
DRAFT PART 70 OPERATING PERMIT

DOCKET # 24-005-1149

COMPANY: Gamse Lithographing Company, Inc.

LOCATION: 7413 Pulaski Highway, Baltimore MD 21237

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ITEM DESCRIPTION

MARYLAND DEPARTMENT OF THE ENVIRONMENT
AIR AND RADIATION ADMINISTRATION
AIR QUALITY PERMITS PROGRAM

PART 70/ TITLE V OPERATING PERMIT PROGRAM OVERVIEW

Origin of the Part 70 Operating Permit

Title V of the Clean Air Act (amended) requires each state to implement a federally enforceable operating permit program for major sources of air pollution. This program, the Part 70 Permit Program, also known as the Title V Permit Program, is designed to provide a comprehensive administrative document (a Part 70 Permit) that will identify all air emissions sources at a given facility with the applicable federal regulations, and will establish the methodology by which the owner/operator will demonstrate compliance. Required testing, monitoring, record-keeping, and reporting for each emissions source are identified, including regulation citation. This Operating Permit is a five-year renewable permit. A responsible official for each facility subject to a Part 70 Operating Permit is required to annually certify compliance with each applicable requirement for that facility.

The Department has had an Air Quality Operating Permit program for many years. The State-Only enforceable permit conditions and applicable regulations listed in Air Quality Permits to Construct issued to a facility will be incorporated into the Part 70 Operating Permit in a separate section. The Department will continue to enforce these state-only requirements. The Part 70 Operating permit will supersede a facility's current State Permit to Operate upon issuance.

Part 70 Operating permits are not for new construction, and do not add any new emissions limitations, standards, or work practices on an affected facility. There may, however, be additional testing, record keeping, monitoring, and reporting requirements. A few facilities which were not subject to Maryland's existing State Permit to Operate Program will be subject to the requirements of the Part 70 Program. The Part 70 Program is based on a facility's potential to emit regulated air pollutants. The State Permit to Operate program is based on types of sources specifically listed in the Code of Maryland Regulations (COMAR). For these few facilities which were not required to receive a state Permit to Operate but are subject to a Part 70 permit, there will be the additional burdens of certifying emissions annually and paying an annual emissions-based permit fee.

Part 70 Permit Issuance Process

The Department will undertake a technical review of the Part 70 permit application and will prepare a draft Permit and Fact Sheet. The Fact Sheet will explain the basis and technical analysis used by the Department to develop federally enforceable permit conditions, including the required testing, monitoring, record keeping, and reporting provisions for each emissions unit at the permitted facility. The Fact Sheet will also include a description of the facility operations and the current compliance status with applicable requirements. If there are any discrepancies between the Part 70 permit application and the draft permit, the Fact Sheet will contain a discussion of the inconsistencies and the final resolution.

The Part 70 Program provides the public, adjacent states, and EPA the opportunity to review and submit comments on draft Part 70 permits. The public may also request a public hearing on the draft permit. Dockets containing a facility's permit application, supporting documents, draft Permit and Fact Sheet will be available for review both at MDE headquarters located at 1800 Washington Boulevard, Baltimore, MD and a public library near the facility's location. Please note: during Covid restrictions, the dockets will be made available on-line only at: https://mde.maryland.gov/programs/Permits/AirManagementPermits/Pages/title5draftpermits.aspx

Public Participation Process

The initial step of the Part 70/ Title V public participation process is the publication of a notice of intent to issue a Part 70 Permit and opportunity for concerned citizens to submit written comments and/ or request a public hearing. The Department will publish the notice at least one time in the legal section of a newspaper of general circulation in the area where the facility is located. The Notice will provide the description of the facility for which a Part 70 permit has been drafted, the location of the docket which contains the application and draft permit conditions with supporting documentation, and the requirements for requesting a public hearing. The applicant is responsible for all costs incurred in the publication of this legal notice. The Department will also send notification to adjacent states, local public officials and interested parties, will include the notice in the docket at the library, and/or post the notice to the Department's website.

The public will have 30 days from the date the notice appears in the newspaper to submit written comments to the Department, or to request in writing a public hearing. Adjacent states will have 30 days from the receipt of notification to submit written comments to the Department.

A request for a public hearing must be made in writing within the 30-day comment period. Comments and hearing requests should be sent to the attention of the Air Quality Permits Program Public Participation Coordinator, Ms. Shannon Heafey via email at Shannon.heafey@maryland.gov or mailed to The Air and Radiation Administration, 1800 Washington Boulevard, Suite 720, Baltimore, MD 21230-1720.

Public Hearing

The purpose of a public hearing is to give interested parties the opportunity to submit comments for the record which are germane to the draft federally enforceable permit conditions. Comments submitted at the hearing, or in writing to the Department during the comment period, should address errors and deficiencies in the permit such as unidentified emissions units, incorrect or deficient regulation citation, deficient record keeping, monitoring, reporting or testing requirements and unresolved compliance issues.

If a public hearing is requested, the Department will make arrangements with the facility to schedule a hearing and will send notification of the hearing to public officials, interested parties, and the EPA. The Department will publish a notice of the scheduled hearing in the legal section of the same newspaper in which the opportunity notification appeared, at least one time and at least 30 days prior to the hearing. The notice will state the date, time, and location of the hearing. During Covid restrictions, public hearings may be held on-line. This public notice will also be posted on the MDE Air Permits Program web page.

After the public comment period has closed, the Department will review the formal testimony as part of the final review and prepare a Response to Comments document which will be sent to the EPA along with the draft Part 70 Permit and Fact Sheet.

Testimony on state-only requirements will be kept on file at the Department as part of the formal record, however, state-only rules and regulations are not federally enforceable, and therefore are not within the scope of the EPA review. The Department will keep a record of the identity of the commentors, their statements, a summary of the issues raised during the public comment period, and the Response to Comments document for at least five years.

Citizen Petition to EPA to Object to Permit Issuance

Interested parties may petition the EPA to object to the Part 70 Permit if the EPA has not already objected, within 60 days after the 45-day EPA review period has ended. The petition period will be posted on the EPA website. The EPA will only consider objections to the federally enforceable provisions of the draft permit which were raised with reasonable specificity during the public comment period, unless: (1) the petitioner demonstrates that it was impractical to raise the objections within the public comment period, or (2) the grounds for the objection arose after the comment period. If the EPA agrees with the petition, the Department will reopen, revise, or revoke the permit as determined.

Applicant Objection to Permit Issuance and Recourse

If the applicant objects to the federally enforceable permit conditions contained in the issued Part 70/Title V Operating permit, it has 15 days from receipt of the issued Permit to request a contested case hearing. More information on that can be found in 40CFR70, and COMAR 26.11.03.11.

MARYLAND DEPARTMENT OF THE ENVIRONMENT
AIR AND RADIATION ADMINISTRATION

NOTICE OF INTENT TO ISSUE PART 70 OPERATING PERMIT, OPPORTUNITY TO SUBMIT WRITTEN COMMENTS OR TO REQUEST A PUBLIC HEARING

The Department of the Environment, Air and Radiation Administration (ARA) has completed its review of the application for a renewal Part 70 Operating Permit submitted by the Gamse Lithographing Company, Inc., located in Baltimore, MD. The facility consists of a sheet-fed lithographic printing area, a flexographic printing area, a bindery area, and a warehouse.

The applicant is represented by:

Mr. Michael J. Cirri, President/Chief Financial Officer
Jenkins Environmental, Inc.
8600 LaSalle Road
York Building, Suite 509
Towson, MD 21286

The Department has prepared a draft Part 70 Operating Permit for review and is now ready to receive public comment. A docket containing the application, draft permit, and supporting documentation is available for review on the Department's website, under the Air Quality Permitting link and may be viewed here: https://mde.maryland.gov/programs/Permits/AirManagementPermits/Pages/title5draftpermits

Interested persons may submit written comments or request a public hearing on the draft permit. Written comments must be received by the Department no later than 30 days from the date of this notice. Requests for a public hearing must be submitted in writing and must also be received by the Department no later than 30 days from the date of this notice.

Comments and requests for a public hearing will be accepted by the Department if they raise issues of law or material fact regarding applicable requirements of Title V of the Clean Air Act, and/or regulations implementing the Title V Program in Maryland found in COMAR.

A Request for public hearing shall include the following:

1) The name, mailing address, and telephone number of the person making the request;

2) The names and addresses of any other persons for whom the person making the request if representing; and

3) The reason why a hearing is requested, including the air quality concern that forms the basis for the request and how this concern relates to the person making the request.

All written comments and requests for a public hearing should be directed to the attention of Ms. Shannon Heafey, Title V Coordinator, Air Quality Permits Program, Air and Radiation Administration via email at Shannon.heafey@maryland.gov.

GAMSE LITHOGRAPHING COMPANY INC.
7413 PULASKI HIGHWAY
BALTIMORE, MD 21237-2529
PART 70 OPERATING PERMIT NO. 24-005-01149 FACT SHEET

BACKGROUND

Gamse Lithographing Company (Gamse), Inc. is a commercial lithographic, flexographic printing facility. In 1955, the firm moved to its present location on Pulaski Highway. By 1960 the building expanded by 8,000 additional square feet to house a new 6 color gravure press. The Pulaski Highway building was further expanded to its present 70,000 square feet.

The facility consists of a sheet-fed lithographic printing area, a flexographic printing area, a bindery area, and a warehouse. The company currently has in operation four (4) sheet-fed lithographic presses and four (4) flexographic web printing presses. The bindery area is used to cut, shape, and fold the various printed materials produced at the facility. The finished goods warehouse area is located at the rear of the facility. The SIC code for the facility is 2754.

During this permitting period, the Permittee added one (1) 16-inch, 10-color Mark Andy flexographic heat-set web press using waterbased and UV inks. This new printing press was permitted and installed in 2015.

Also during this period, the Permittee discontinued the following units: one (1) rotogravure press (#47) equipped with TEC catalytic oxidizer; one (1) non-heat set web press (#43); one (1) 6-color non-heat set web press (#46); one (1) 8-color non-heat set web press (#41). On June 30, 2019 Gamse Lithographing Company, Inc. completed a replacement in kind of one (1) 8-color sheet-fed press (#42) with a new similar 8-color unit (#30). The one (1) 8-color sheet-fed lithographic press (#42) was decommissioned on June 30, 2019.

The actual VOC emissions from this facility are above the major source threshold levels. The major source threshold for triggering Title V permitting requirements in Baltimore County is a potential to emit of 25 tons per year for VOC, 25 tons per year for NOx, and 100 tons per year of any other criteria pollutant. Since actual VOC emissions from the facility are greater than the major source threshold, Gamse Lithographing Company, Inc. is required to obtain a Title V-Part 70 Operating Permit under COMAR 26.11.03.01.

Table 1 summarizes the potential and actual emissions from the facility based on calculations and as reported in the Annual Emission Certification Reports."

Table 1: Facility Actual Emissions

Potential Emissions	NO_X (TPY)	SO_X (TPY)	PM_{10} (TPY)	CO (TPY)	HAP (TPY)	VOC (TPY)
2019	0.00	0.00	0.00	0.00	0.30	19.9
2018	0.00	0.00	0.00	0.00	0.35	18.99
2017	0.14	0.001	0.011	0.117	1.66	27.6
2016	0.18	0.001	0.013	0.148	2.00	33.3
2015	1.13	0.001	0.00	0.106	1.94	32.4

Gamse Lithographing Company, Inc. was issued a Title V-Part 70 Operating Permit on July 25, 2001. The current Part 70 Operating Permit will expire on September 30, 2020. A permit renewal application was received on November 26, 2019. A completeness determination letter was sent to Gamse Lithographing Company, Inc. on December 5, 2019 granting the facility an application shield.

EMISSION UNIT IDENTIFICATION

Gamse Lithographing Company, Inc. has identified the following emission units as being subject to the Title V permitting requirements and having applicable requirements:

Table 2: Emission Units

Emission Unit Number	Press Number	MDE Reg. No.	Emissions Unit Name and Description	PTC Issued
FLEXOGRAPHIC PRESSES				
EU 11	69	6-3017	16-inch, 10-color Mark Andy flexographic heat-set press using water-based inks	2011
EU 12	66	6-2825	16-inch, 10-color COMCO Pro-Glide flexographic heat-set press using water-based inks	2005
EU 13	68	6-2936	13-inch, 10-color Mark Andy LP3000 flexographic printing press equipped with a UV curing system on one color unit	2008
EU 14	70	6-3123	16-inch, 10-color Mark Andy flexographic heat-set web press using water-based and UV inks	2015

SHEET-FED LITHOGRAPHIC PRESSES				
EU15	30	6-3194	8-color lithographic printing press	2019
EU 8	40	6-1983	29-inch, 8-color lithographic printing press with aqueous coater and UV ink capability	2006
EU 5	42	6-2156	8-color Heidelberg CD sheet-fed lithographic press with a coating tower	1995
EU10	44	6-2377	2- color Heidelberg sheet-fed lithographic press	1998

COMPLIANCE ASSURANCE MONITORING (CAM) APPLICABILITY

Compliance Assurance Monitoring (CAM) 40 CFR, Subpart 64 applies to any emission unit at a Title V source that meets the following criteria:

- The emission unit is subject to a federally enforceable emission limit or standard for a regulated pollutant;
- The emission unit uses a control device to achieve compliance with any such emission limitation;
- The emission unit has the potential to emit 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 and must not otherwise be exempt from CAM.

Gamse Lithographing Company, Inc. maintains various printing presses. However, none of the presses require the use of a control device to achieve compliance with applicable emission limits. Also, none of the presses has a potential to emit pre-controlled 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. Furthermore, no control devices are employed to control particulate, sulfur oxides, nitrogen oxides, or VOC. CAM requirements, therefore, are not applicable to these units.

AN OVERVIEW OF THE PART 70 PERMIT

Section I of the Part 70 Permit contains a brief description of the facility and an inventory list of the emissions units for which applicable requirements are identified in Section IV of the permit.

Section II of the Part 70 Permit contains the general requirements that relate to administrative permit actions. This section includes the procedures for renewing, amending, reopening, and transferring permits, the relationship to permits to construct and approvals, and the general duty to provide information and to comply with all applicable requirements.

Section III of the Part 70 Permit contains the general requirements for testing, record keeping and reporting; and requirements that affect the facility as a whole, such as open burning, air pollution episodes, particulate matter from construction and demolition activities, asbestos provisions, ozone depleting substance provisions, general conformity, and acid rain permit. This section includes the requirement to report excess emissions and deviations, to submit an annual emissions certification report and an annual compliance certification report, and results of sampling and testing.

Section IV of the Part 70 Permit identifies the emissions standards, emissions limitations, operational limitations, and work practices applicable to each emissions unit located at the facility. For each standard, limitation, and work practice, the permit identifies the basis upon which the Permittee will demonstrate compliance. The basis will include testing, monitoring, record keeping, and reporting requirements. The demonstration may include one or more of these methods.

Section V of the Part 70 Permit contains a list of insignificant activities. These activities emit very small quantities of regulated air pollutants and do not require a permit to construct or registration with the Department. For insignificant activities that are subject to a requirement under the Clean Air Act, the requirement is listed under the activity.

Section VI of the Part 70 Permit contains State-only enforceable requirements. Section VI identifies requirements that are not based on the Clean Air Act, but solely on Maryland air pollution regulations. These requirements generally relate to the prevention of nuisances and implementation of Maryland's Air Toxics Program.

REGULATORY AND TECHNICAL REVIEW

Emission Units: Facility Wide

The requirement to control VOC leaks from equipment as found in COMAR 26.11.19.16 applies to any person subject to a VOC emission standard in Chapter 19 and not subject to a specific leak requirement in a regulation. GAMSE is subject to the regulations in Chapter 19 that apply to printing operations.

Applicable Standards/Limits:
Control of VOC Emissions
COMAR 26.11.19.16C&D – Control of VOC Equipment Leaks

"General Requirements. A person subject to this regulation shall comply with all of the following requirements:

(1) Visually inspect all components on the premises for leaks at least once each calendar month.

(2) Tag any leak immediately so that the tag is clearly visible. The tag shall be made of a material that will withstand any weather or corrosive conditions to which it may be normally exposed. The tag shall bear an identification number, the date the leak was discovered, and the name of the person who discovered the leak. The tag shall remain in place until the leak has been repaired.
(3) Take immediate action to repair all observed VOC leaks that can be repaired within 48 hours.
(4) Repair all other leaking components not later than 15 days after the leak is discovered. If a replacement part is needed, the part shall be ordered within 3 days after discovery of the leak, and the leak shall be repaired within 48 hours after receiving the part.
(5) Maintain a supply of components or component parts that are recognized by the source to wear or corrode, or that otherwise need to be routinely replaced, such as seals, gaskets, packing, and pipefitting.
(6) Maintain a log that includes the name of the person conducting the inspection and the date on which leak inspections are made, the findings of the inspection, and a list of leaks by tag identification number. The log shall be made available to the Department upon request. Leak records shall be maintained for a period of not less than 2 years from the date of their occurrence."

"Exceptions. Components that cannot be repaired as required in this regulation because they are inaccessible, or that cannot be repaired during operation of the source, shall be identified in the log and included within the source's maintenance schedule for repair during the next source shutdown."

Compliance Demonstration

The Permittee shall visually inspect all components on the premises for VOC leaks at least once each calendar month following the procedures specified in COMAR 26.11.19.16. **[Reference: COMAR 26.11.19.16C(1)]**

The Permittee shall maintain a log that includes the date on which leak inspections are made, the name of the person conducting the inspection, the findings of the inspection, a list of leaks by tag identification number and identity of components that cannot be repaired as required in this regulation because they are inaccessible, or that cannot be repaired during operation of the source. **[Reference: COMAR 26.11.19.16C and COMAR 26.11.03.06C]**

Emission Units: Flexographic Presses

EU 11 Press #69 MDE Reg. No. 6-3017

16-inch, 10-color Mark Andy flexographic heat-set press using water-based inks, installed in 2011.

EU 12 Press#66 MDE Reg. No. 6-2825
16-inch, 10-color COMCO Pro-Glide flexographic heat-set press using water-based inks, installed in 2005.

EU 13 Press#68 MDE Reg. No. 6-2936
13-inch, 10-color Mark Andy LP3000 flexographic printing press equipped with a UV curing system on one color unit, installed in 2008.

EU-14 Press #70 MDE Reg. No. 6-3123
16-inch, 10-color Mark Andy flexographic heat-set web press using water-based and UV inks, installed in 2015.

These presses are subject to COMAR 26.11.19.10 requirements. The Permittee has chosen to comply with the option described in COMAR 26.11.19.10C(1) by using water-based inks that contain less than 25% VOC by volume of the volatile portion of the ink, or high solids inks that contain not less than 60 percent nonvolatiles.

Control of VOC Emissions

Applicable Standards/Limits:
COMAR 26.11.19.10C – Requirements for Sheet-Fed or Web-Fed Flexographic, Packaging Rotogravure, and Publication Rotogravure Printing.
"A person who owns or operates a printing press that uses flexographic, packaging rotogravure, or publication rotogravure methods and is a major stationary source as defined in Regulation .01B(4) of this chapter, shall:
(1) Reduce emissions by using water-based inks that contain less than 25 percent VOC by volume of volatile portion of the ink, or high solids inks that contain not less than 60 percent nonvolatile; or
(2) If compliance with the requirements of Sec. C(1) of this regulation cannot be achieved, reduce the VOC content of each ink, or reduce the average VOC content of inks used at each press as follows:
   a. 60 percent reduction for flexographic presses,
   b. 65 percent reduction for packaging rotogravure presses, and
   c. 75 percent reduction for publication rotogravure presses."

Compliance Demonstration:
The Permittee shall:
(1) Maintain MSD sheets or other manufacturer's certified product sheets for each material used where the VOC content specified on MSD or product sheets has been determined based on EPA Reference Method 24 or an equivalent methodology approved by the Department.
(2) Maintain records pertaining to the low solvent or high solids characteristics of VOC materials used that are adequate to demonstrate that emissions are below the applicable threshold as stated in COMAR 26.11.19.10C(1)
[Reference: COMAR 26.11.03.06C]

The Permittee shall report the quantity and identity of all VOC- containing materials that are used during a year in the annual emissions certification report. **[Reference: COMAR 26.11.03.06C]**

Emission Units: Sheet-Fed Lithographic Presses

EU 15 Press# 30 MDE Reg. No. 6-3194
40-inch, 8-color sheet-fed lithographic press, installed in 2019.

EU 8 Press#40 MDE Reg. No. 6-1983
29-inch, 8-color lithographic printing press with aqueous coater and UV ink capability, installed in 1993.

EU 5 Press#42 MDE Reg. No. 6-2156
8-color Heidelberg CD sheet-fed lithographic press with a coating tower, installed in 1995.

EU10 Press#44 MDE Reg. No. 6-2377
2- color Heidelberg sheet-fed lithographic press, installed in 1998.

These presses are subject to COMAR 26.11.19.11C and E.

Control of VOC Emissions

A. COMAR 26.11.19.11C – Standards for Sheet-Fed Lithographic Printing.
"A person may not operate a sheet-fed letter or lithographic press with a cylinder width of 18 inches or greater unless:
(1) The fountain solution is refrigerated to maintain a temperature of less than 55° F if isopropyl alcohol is used;
(2) A temperature indicator is installed to monitor the fountain temperature if the solution is refrigerated; and
(3) The fountain solution contains less than 8.5 percent isopropyl alcohol by weight."

Compliance Demonstration:
The temperature sensors installed to measure the fountain solution temperature shall be checked with a calibrated thermometer at least once every six months if IPA is used. The results of the measurement and the deviation of the temperature gage from the thermometer reading shall be recorded. **[Reference: COMAR 26.11.03.06C]**

The fountain solution temperature of any press using isopropyl alcohol in the fountain solution shall be checked once each day the press is operating and the results recorded. **[Reference: COMAR 26.11.03.06C]**

If isopropyl alcohol is used on any press, the Permittee shall have readily available for the operator of that press and environmental inspectors a hydrometer calibrated

in percent isopropyl alcohol for the purpose of checking the alcohol content of the fountain solution. A hydrometer reading shall be taken and recorded each time after alcohol is added to the fountain solution. If the alcohol content of the fountain solution is regulated automatically, a hydrometer reading shall be taken and recorded at least once every operating shift. **[Reference: COMAR 26.11.03.06C]**

The Permittee shall maintain:

(1) Daily records of fountain solution temperature for fountain solutions containing isopropyl alcohol. **[Reference: COMAR 26.11.03.06C]**

(2) Copies of the MSD Sheets or VOC data sheets that show the quantity of VOC in the inks and fountain solutions calculated using EPA Reference Method 24 or equivalent. **[Reference: COMAR 26.11.03.06C]**

(3) Monthly records of hours of operation for each press and total material usage. **[Reference: MDE PTC Nos. 03-6-2156N, 005-6-2818N, 03-6-1983N, 03-6-2634N]**

The Permittee shall report the quantity and identity of all VOC- containing materials that are used during a year in the annual emissions certification report. **[Reference: COMAR 26.11.03.06C]**

B. COMAR 26.11.19.11F – Requirements for Cleaning Materials.

"(1) A person who owns or operates a lithographic press or letterpress shall comply with this section.

(2) A person subject to this regulation may use up to a total of 110 gallons per calendar year of cleaning solutions at a premises without regard to VOC content.

(3) A person subject to this regulation that uses any cleaning solution at a premises excluding the 110 gallons per calendar year specified in §F(2) shall ensure that the additional cleaning solution:

(a) Has a composite vapor pressure of less than 10 mm of mercury at 68º F (20ºC); or

(b) Contains less than 70 percent VOC by weight."

Compliance Demonstration:

The Permittee shall perform tests when required as part of an evaluation requested by the Department of non-VOC and low VOC cleanup materials. **[Reference: COMAR 26.11.19.11E(4)]**

COMAR 26.11.19.11E(3) – The Permittee shall perform an inspection once a month to verify compliance with the requirement to store waste and other materials that contain VOC in closed containers and maintain lids on VOC cleanup materials storage.

The Permittee shall:

(1) Keep a written copy of the good operating practices manual;

(2) Maintain a record of the results of the monthly inspections performed to verify that good operating practices are implemented; and

(3) Keep records of the results of any clean-up materials study, which was requested by the Department.

[Reference: COMAR 26.11.19.11E(3) and COMAR 26.11.03.06C]

The Permittee shall report the results of any clean-up materials study requested by the Department. **[Reference: COMAR 26.11.19.11E(4)]**

In addition, a person subject to this regulation shall maintain records on site including the following information:

(1) The fountain solution formulations;
(2) The VOC content, in percent VOC by weight, of the fountain solutions;
(3) The temperature of the press fountain solutions for lithographic printing presses using alcohol in the fountain solution; and
(4) The quantity of cleaning solutions used and their vapor pressure or percentage VOC concentration by weight." **[Reference: COMAR 26.11.19.11H]**

COMPLIANCE HISTORY

Gamse entered into a Consent Agreement with the Department on September 30, 2009 to correct violations of its Title V Operating permit. Additional operating conditions of the Consent Agreement have been incorporated into the Title V operating permit.

COMPLIANCE SCHEDULE

Gamse Lithographing is currently in compliance with all applicable air quality regulations.

TITLE IV - ACID RAIN

The Acid Rain Program does not apply to Gamse Lithographing.

TITLE VI - OZONE DEPLETING SUBSTANCES

The facility is currently complying with the applicable federal requirements in 40 CFR 82, 82.34(a); 82.42(a)(1); 82.42(b)(1),(2).

SECTION 112 (r) - ACCIDENTAL RELEASE

The facility is not subject to the requirements of Section 112(r) of the CAA.

PERMIT SHIELD

Gamse Lithographing requested a permit shield. The Department grants a permit shield on a unit-by-unit basis. This shield will cover the applicable Clean Air Act Requirements that the Department has listed for each unit in this permit.

SECTION V INSIGNIFICANT ACTIVITIES

This section provides a list of insignificant emissions units that were reported in the Title V permit application. The applicable Clean Air Act requirements, if any, are listed below the insignificant activity.

(1) ✓ Space heaters utilizing direct heat transfer and used solely for comfort heat;

(2) ✓ Water cooling towers and water cooling ponds unless used for evaporative cooling of water from barometric jets or barometric condensers, or used in conjunction with an installation requiring a permit to operate;

(3) No. 10 Unheated VOC dispensing containers or unheated VOC rising containers of 60 gallons (227 liters) capacity or less;

(4) Containers, reservoirs, or tanks used exclusively for:

(a) No. 1 Storage of lubricating oils;
(b) No. 50 The storage of VOC normally used as solvents, diluents, thinners, inks, colorants, paints, lacquers, enamels, varnishes, liquid resins, or other surface coatings and having individual capacities of 2,000 gallons (7.6 cubic meters) or less;

(5) ✓ Non-contact water (i.e., water that has not been in direct contact with process fluids) cooling towers except as regulated under Section 112 of the Clean Air Act;

(6) Any other emissions unit at the facility which is not subject to an applicable requirement of the Clean Air Act:

No. 1 Paper cutting, collating, folding, binding, and gluing equipment associated with the printing press lines.

No. 1 EU4 41 gallon Solvent Wash Tank in Gravure Press Room. Emission unit EU-4 consists of a solvent wash tank located in the gravure press room. This solvent wash tank is used to clean press components from the gravure press. The solvent wash tank is equipped with a lid that remains closed when the unit is not in operation to suppress the evaporative

emissions from the cleaning solvent. The solvent wash tank was installed prior to 1995.

SECTION VI STATE-ONLY ENFORCEABLE CONDITIONS

The Permittee is subject to the following State-only enforceable requirements:

1. Applicable Regulations:
   (A) COMAR 26.11.06.08 and 26.11.06.09, which generally prohibit the discharge of emissions beyond the property line in such a manner that a nuisance or air pollution is created.

   (B) COMAR 26.11.15.05, which requires that the Permittee implement "Best Available Control Technology for Toxics" (T – BACT) to control emissions of toxic air pollutants.

   (C) COMAR 26.11.15.06, which prohibits the discharge of toxic air pollutants to the extent that such emissions will unreasonably endanger human health.

2. Operating Conditions:
   The Permittee shall comply with the requirements stated I COMAR 26.11.19.02I & COMAR 26.11.19.11E, use low solvent inks, and shall not use isopropyl alcohol in the fountain solutions in order to satisfy the T-BACT requirement of COMAR 26.11.15.05. **[PTC 005-6-2825N Issued on May 13, 2005]**

3. Testing and Monitoring:

4. Record Keeping and Reporting:

   The Permittee shall submit to the Department, by April 1 of each year during the term of this permit, a written certification of the results of an analysis of emissions of toxic air pollutants from the Permittee's facility during the previous calendar year. The analysis shall include either:

   (a) A statement that previously submitted compliance demonstrations for emissions of toxic air pollutants remain valid; or

   (b) A revised compliance demonstration, developed in accordance with requirements included under COMAR 26.11.15 & 16, that accounts for changes in operations, analytical methods, emissions determinations, or other factors that have invalidated previous demonstrations.

Larry Hogan, Jr.
Governor

Ben Grumbles
Secretary

Boyd K. Rutherford
Lt. Governor

Air and Radiation Administration
1800 Washington Boulevard, Suite 720
Baltimore, MD 21230

[ ] Construction Permit

[X] Draft Part 70 Operating Permit

PERMIT NO. 24-005-01149

DATE ISSUED

PERMIT FEE To be paid in accordance with COMAR 26.11.02.19B

EXPIRATION DATE

LEGAL OWNER & ADDRESS

Gamse Lithographing Company, Inc.
7413 Pulaski Highway
Baltimore, MD, 21237-2529
Attn: Mr. Matthew Haynes
Director of Quality Assurance

SITE

Gamse Lithographing Company, Inc.
7413 Pulaski Highway
Baltimore, MD, 21237
Baltimore County
AI # 2143

SOURCE DESCRIPTION

Printing facility.

This source is subject to the conditions described on the attached pages.

Program Manager

Director, Air and Radiation Management Administration

GAMSE LITHOGRAPHING COMPANY INC.
7413 PULASKI HIGHWAY
BALTIMORE, MD 21237-2529
DRAFT PART 70 OPERATING PERMIT NO. 24-005-01149

SECTION I SOURCE IDENTIFICATION

1. DESCRIPTION OF FACILITY

Gamse Lithographing Company (Gamse), Inc. is a commercial lithographic, flexographic printing facility. In 1955, the firm moved to its present location on Pulaski Highway. By 1960 the building expanded by 8,000 additional square feet to house a new 6 color gravure press. The Pulaski Highway building was further expanded to its present 70,000 square feet.

The facility consists of a sheet-fed lithographic printing area, a flexographic printing area, a bindery area, and a warehouse. The company currently has in operation, four (4) sheet-fed lithographic presses, and four (4) flexographic web printing presses. The bindery area is used to cut, shape, and fold the various printed materials produced at the facility. The finished goods warehouse area is located at the rear of the facility. The SIC code for the facility is 2754.

The actual VOC emissions from this facility are above the major source threshold levels, and therefore, the facility is required to obtain a Part 70 operating permit.

2. FACILITY INVENTORY LIST

Emission Unit Number	Press Number	MDE Reg. No.	Emissions Unit Name and Description	PTC Issued
FLEXOGRAPHIC PRESSES				
EU 11	69	6-3017	16-inch, 10-color Mark Andy flexographic heat-set press using water-based inks	2011
EU 12	66	6-2825	16-inch, 10-color COMCO Pro-Glide flexographic heat-set press using water-based inks	2005
EU 13	68	6-2936	13-inch, 10-color Mark Andy LP3000 flexographic printing press equipped with a UV curing system on one color unit	2008
EU 14	70	6-3123	16-inch, 10-color Mark Andy flexographic heat-set web press using water-based and UV inks	2015

SHEET-FED LITHOGRAPHIC PRESSES				
EU15	30	6-3194	8-color lithographic printing press	2019
EU 8	40	6-1983	29-inch, 8-color lithographic printing press with aqueous coater and UV ink capability	2006
EU 5	42	6-2156	8-color Heidelberg CD sheet-fed lithographic press with a coating tower	1995
EU10	44	6-2377	2- color Heidelberg sheet-fed lithographic press	1998

SECTION II GENERAL CONDITIONS

1. DEFINITIONS

[COMAR 26.11.01.01] and [COMAR 26.11.02.01]

The words or terms in this Part 70 permit shall have the meanings established under COMAR 26.11.01 and .02 unless otherwise stated in this permit.

2. ACRONYMS

ARMA	Air and Radiation Management Administration
BACT	Best Available Control Technology
Btu	British thermal unit
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CEM	Continuous Emissions Monitor
CFR	Code of Federal Regulations
CO	Carbon Monoxide
COMAR	Code of Maryland Regulations
EPA	United States Environmental Protection Agency
FR	Federal Register
gr	grains
HAP	Hazardous Air Pollutant
MACT	Maximum Achievable Control Technology
MDE	Maryland Department of the Environment
MVAC	Motor Vehicle Air Conditioner
NESHAPS	National Emission Standards for Hazardous Air Pollutants
NO_x	Nitrogen Oxides
NSPS	New Source Performance Standards
NSR	New Source Review
OTR	Ozone Transport Region
PM	Particulate Matter
PM10	Particulate Matter with Nominal Aerodynamic Diameter of 10 micrometers or less
ppm	parts per million
ppb	parts per billion
PSD	Prevention of Significant Deterioration
PTC	Permit to construct
PTO	Permit to operate (State)
SIC	Standard Industrial Classification
SO_2	Sulfur Dioxide

TAP	Toxic Air Pollutant
tpy	tons per year
VE	Visible Emissions
VOC	Volatile Organic Compounds

3. EFFECTIVE DATE

The effective date of the conditions in this Part 70 permit is the date of permit issuance, unless otherwise stated in the permit.

4. PERMIT EXPIRATION

[COMAR 26.11.03.13B(2)]

Upon expiration of this permit, the terms of the permit will automatically continue to remain in effect until a new Part 70 permit is issued for this facility provided that the Permittee has submitted a timely and complete application and has paid applicable fees under COMAR 26.11.02.16.

Otherwise, upon expiration of this permit the right of the Permittee to operate this facility is terminated.

5. PERMIT RENEWAL

[COMAR 26.11.03.02B(3)] and [COMAR 26.11.03.02E]

The Permittee shall submit to the Department a completed application for renewal of this Part 70 permit at least 12 months before the expiration of the permit. Upon submitting a completed application, the Permittee may continue to operate this facility pending final action by the Department on the renewal.

The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall submit such supplementary facts or corrected information no later than 10 days after becoming aware that this occurred. The Permittee shall also provide additional information as necessary to address any requirements that become applicable to the facility after the date a completed application was submitted, but prior to the release of a draft permit. This information shall be submitted to the Department no later than 20 days after a new requirement has been adopted.

6. CONFIDENTIAL INFORMATION

[COMAR 26.11.02.02G]

In accordance with the provisions of the State Government Article, Sec. 10-611 et seq., Annotated Code of Maryland, all information submitted in an application shall be considered part of the public record and available for inspection and copying, unless the Permittee claims that the information is confidential when it is submitted to the Department. At the time of the request for inspection or copying, the Department will make a determination with regard to the confidentiality of the information. The Permittee, when requesting confidentiality, shall identify the information in a manner specified by the Department and, when requested by the Department, promptly provide specific reasons supporting the claim of confidentiality. Information submitted to the Department without a request that the information be deemed confidential may be made available to the public. Subject to approval of the Department, the Permittee may provide a summary of confidential information that is suitable for public review. The content of this Part 70 permit is not subject to confidential treatment.

7. PERMIT ACTIONS

[COMAR 26.11.03.06E(3)] and [COMAR 26.11.03.20(A)]

This Part 70 permit may be revoked or reopened and revised for cause. The filing of an application by the Permittee for a permit revision or renewal; or a notification of termination, planned changes or anticipated noncompliance by the facility, does not stay a term or condition of this permit.

The Department shall reopen and revise, or revoke the Permittee's Part 70 permit under the following circumstances:

a. Additional requirements of the Clean Air Act become applicable to this facility and the remaining permit term is 3 years or more;

b. The Department or the EPA determines that this Part 70 permit contains a material mistake, or is based on false or inaccurate information supplied by or on behalf of the Permittee;

c. The Department or the EPA determines that this Part 70 permit must be revised or revoked to assure compliance with applicable requirements of the Clean Air Act; or

d. Additional requirements become applicable to an affected source under the Federal Acid Rain Program.

8. PERMIT AVAILABILITY

[COMAR 26.11.02.13G]

The Permittee shall maintain this Part 70 permit in the vicinity of the facility for which it was issued, unless it is not practical to do so, and make this permit immediately available to officials of the Department upon request.

9. REOPENING THE PART 70 PERMIT FOR CAUSE BY THE EPA

[COMAR 26.11.03.20B]

The EPA may terminate, modify, or revoke and reissue a permit for cause as prescribed in 40 CFR §70.7(g)

10. TRANSFER OF PERMIT

[COMAR 26.11.02.02E]

The Permittee shall not transfer this Part 70 permit except as provided in COMAR 26.11.03.15.

11. REVISION OF PART 70 PERMITS – GENERAL CONDITIONS

[COMAR 26.11.03.14] and [COMAR 26.11.03.06A(8)]

a. The Permittee shall submit an application to the Department to revise this Part 70 permit when required under COMAR 26.11.03.15 -.17.

b. When applying for a revision to a Part 70 permit, the Permittee shall comply with the requirements of COMAR 26.11.03.02 and .03 except that the application for a revision need include only information listed that is related to the proposed change to the source and revision to the permit. This information shall be sufficient to evaluate the proposed change and to determine whether it will comply with all applicable requirements of the Clean Air Act.

c. The Permittee may not change any provision of a compliance plan or schedule in a Part 70 permit as an administrative permit amendment or as a minor permit modification unless the change has been approved by the Department in writing.

d. A permit revision is not required for a change that is provided for in this permit relating to approved economic incentives, marketable permits, emissions trading, and other similar programs.

12. SIGNIFICANT PART 70 OPERATING PERMIT MODIFICATIONS

[COMAR 26.11.03.17]

The Permittee may apply to the Department to make a significant modification to its Part 70 Permit as provided in COMAR 26.11.03.17 and in accordance with the following conditions:

a. A significant modification is a revision to the federally enforceable provisions in the permit that does not qualify as an administrative permit amendment under COMAR 26.11.03.15 or a minor permit modification as defined under COMAR 26.11.03.16.

b. This permit does not preclude the Permittee from making changes, consistent with the provisions of COMAR 26.11.03, that would make the permit or particular terms and conditions of the permit irrelevant, such as by shutting down or reducing the level of operation of a source or of an emissions unit within the source. Air pollution control equipment shall not be shut down or its level of operation reduced if doing so would violate any term of this permit.

c. Significant permit modifications are subject to all requirements of COMAR 26.11.03 as they apply to permit issuance and renewal, including the requirements for applications, public participation, and review by affected states and EPA, except:

(1) An application need include only information pertaining to the proposed change to the source and modification of this permit, including a description of the change and modification, and any new applicable requirements of the Clean Air Act that will apply if the change occurs;

(2) Public participation, and review by affected states and EPA, is limited to only the application and those federally enforceable

terms and conditions of the Part 70 permit that are affected by the significant permit modification.

d. As provided in COMAR 26.11.03.15B(5), an administrative permit amendment may be used to make a change that would otherwise require a significant permit modification if procedures for enhanced preconstruction review of the change are followed that satisfy the requirements of 40 CFR 70.7(d)(1)(v).

e. Before making a change that qualifies as a significant permit modification, the Permittee shall obtain all permits-to-construct and approvals required by COMAR 26.11.02.

f. The Permittee shall not make a significant permit modification that results in a violation of any applicable requirement of the Clean Air Act.

g. The permit shield in COMAR 26.11.03.23 applies to a final significant permit modification that has been issued by the Department, to the extent applicable under COMAR 26.11.03.23.

13. MINOR PERMIT MODIFICATIONS

[COMAR 26.11.03.16]

The Permittee may apply to the Department to make a minor modification to the federally enforceable provisions of this Part 70 permit as provided in COMAR 26.11.03.16 and in accordance with the following conditions:

a. A minor permit modification is a Part 70 permit revision that:

(1) Does not result in a violation of any applicable requirement of the Clean Air Act;

(2) Does not significantly revise existing federally enforceable monitoring, including test methods, reporting, record keeping, or compliance certification requirements except by:

(a) Adding new requirements,

(b) Eliminating the requirements if they are rendered meaningless because the emissions to which the requirements apply will no longer occur, or

(c) Changing from one approved test method for a pollutant and source category to another;

(3) Does not require or modify a:

(a) Case-by-case determination of a federally enforceable emissions standard,

(b) Source specific determination for temporary sources of ambient impacts, or

(c) Visibility or increment analysis;

(4) Does not seek to establish or modify a federally enforceable permit term or condition for which there is no corresponding underlying applicable requirement of the Clean Air Act, but that the Permittee has assumed to avoid an applicable requirement to which the source would otherwise be subject, including:

(a) A federally enforceable emissions standard applied to the source pursuant to COMAR 26.11.02.03 to avoid classification as a Title I modification; and

(b) An alternative emissions standard applied to an emissions unit pursuant to regulations promulgated under Section 112(i)(5) of the Clean Air Act

(5) Is not a Title I modification; and

(6) Is not required under COMAR 26.11.03.17 to be processed as a significant modification to this Part 70 permit.

b. Application for a Minor Permit Modification

The Permittee shall submit to the Department an application for a minor permit modification that satisfies the requirements of COMAR 26.11.03.03 which includes the following:

(1) A description of the proposed change, the emissions resulting from the change, and any new applicable requirements that will apply if the change is made;

(2) The proposed minor permit modification;

(3) Certification by a responsible official, in accordance with COMAR 26.11.02.02F, that:

(a) The proposed change meets the criteria for a minor permit modification, and

(b) The Permittee has obtained or applied for all required permits-to-construct required by COMAR 26.11.03.16 with respect to the proposed change;

(4) Completed forms for the Department to use to notify the EPA and affected states, as required by COMAR 26.11.03.07-.12.

c. Permittee's Ability to Make Change

(1) For changes proposed as minor permit modifications to this permit that will require the applicant to obtain a permit to construct, the permit to construct must be issued prior to the new change.

(2) During the period of time after the Permittee applies for a minor modification but before the Department acts in accordance with COMAR 26.11.03.16F(2):

(a) The Permittee shall comply with applicable requirements of the Clean Air Act related to the change and the permit terms and conditions described in the application for the minor modification.

(b) The Permittee is not required to comply with the terms and conditions in the permit it seeks to modify. If the Permittee fails to comply with the terms and conditions in the application during this time, the terms and conditions of both this permit and the application for modification may be enforced against it.

d. The Permittee is subject to enforcement action if it is determined at any time that a change made under COMAR 26.11.03.16 is not within the scope of this regulation.

e. Minor permit modification procedures may be used for Part 70 permit modifications involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches, but only to

the extent that the minor permit modification procedures are explicitly provided for in regulations approved by the EPA as part of the Maryland SIP or in other applicable requirements of the Clean Air Act.

14. ADMINISTRATIVE PART 70 OPERATING PERMIT AMENDMENTS

[COMAR 26.11.03.15]

The Permittee may apply to the department to make an administrative permit amendment as provided in COMAR 26.11.03.15 and in accordance with the following conditions:

a. An application for an administrative permit amendment shall:

(1) Be in writing;

(2) Include a statement certified by a responsible official that the proposed amendment meets the criteria in COMAR 26.11.03.15 for an administrative permit amendment, and

(3) Identify those provisions of this part 70 permit for which the amendment is requested, including the basis for the request.

b. An administrative permit amendment:

(1) Is a correction of a typographical error;

(2) Identifies a change in the name, address, or phone number of a person identified in this permit, or a similar administrative change involving the Permittee or other matters which are not directly related to the control of air pollution;

(3) requires more frequent monitoring or reporting by the Permittee;

(4) Allows for a change in ownership or operational control of a source for which the Department determines that no other revision to the permit is necessary and is documented as per COMAR 26.11.03.15B(4);

(5) Incorporates into this permit the requirements from preconstruction review permits or approvals issued by the

Department in accordance with COMAR 26.11.03.15B(5), but only if it satisfies 40 CFR 70.7(d)(1)(v);

(6) Incorporates any other type of change, as approved by the EPA, which is similar to those in COMAR 26.11.03.15B(1)—(4);

(7) Notwithstanding COMAR 26.11.03.15B(1)—(6), all modifications to acid rain control provisions included in this Part 70 permit are governed by applicable requirements promulgated under Title IV of the Clean Air Act; or

(8) Incorporates any change to a term or condition specified as State-only enforceable, if the Permittee has obtained all necessary permits-to-construct and approvals that apply to the change.

c. The Permittee may make the change addressed in the application for an administrative amendment upon receipt by the Department of the application, if all permits-to-construct or approvals otherwise required by COMAR 26.11.02 prior to making the change have first been obtained from the Department.

d. The permit shield in COMAR 26.11.03.23 applies to administrative permit amendments made under Section B(5) of COMAR 26.11.03.15 , but only after the Department takes final action to revise the permit.

e. The Permittee is subject to enforcement action if it is determined at any time that a change made under COMAR 26.11.03.15 is not within the scope of this regulation.

15. OFF-PERMIT CHANGES TO THIS SOURCE

[COMAR 26.11.03.19]

The Permittee may make off-permit changes to this facility as provided in COMAR 26.11.03.19 and in accordance with the following conditions:

a. The Permittee may make a change to this permitted facility that is not addressed or prohibited by the federally enforceable conditions of this Part 70 permit without obtaining a Part 70 permit revision if:

(1) The Permittee has obtained all permits and approvals required by COMAR 26.11.02 and .03;

(2) The change is not subject to any requirements under Title IV of the Clean Air Act;

(3) The change is not a Title I modification; and

(4) The change does not violate an applicable requirement of the Clean Air Act or a federally enforceable term or condition of the permit.

b. For a change that qualifies under COMAR 26.11.03.19, the Permittee shall provide contemporaneous written notice to the Department and the EPA, except for a change to an emissions unit or activity that is exempt from the Part 70 permit application, as provided in COMAR 26.11.03.04. This written notice shall describe the change, including the date it was made, any change in emissions, including the pollutants emitted, and any new applicable requirements of the Clean Air Act that apply as a result of the change.

c. Upon satisfying the requirements of COMAR 26.11.03.19, the Permittee may make the proposed change.

d. The Permittee shall keep a record describing:

(1) Changes made at the facility that result in emissions of a regulated air pollutant subject to an applicable requirement of the Clean Air Act, but not otherwise regulated under this permit; and

(2) The emissions resulting from those changes.

e. Changes that qualify under COMAR 26.11.03.19 are not subject to the requirements for Part 70 revisions.

f. The Permittee shall include each off-permit change under COMAR 26.11.03.19 in the application for renewal of the part 70 permit.

g. The permit shield in COMAR 26.11.03.23 does not apply to off-permit changes made under COMAR 26.11.03.19.

h. The Permittee is subject to enforcement action if it is determined that an off-permit change made under COMAR 26.11.03.19 is not within the scope of this regulation.

16. ON-PERMIT CHANGES TO SOURCES

[COMAR 26.11.03.18]

The Permittee may make on-permit changes that are allowed under Section 502(b)(10) of the Clean Air Act as provided in COMAR 26.11.03.18 and in accordance with the following conditions:

a. The Permittee may make a change to this facility without obtaining a revision to this Part 70 permit if:

(1) The change is not a Title I modification;

(2) The change does not result in emissions in excess of those expressly allowed under the federally enforceable provisions of the Part 70 permit for the permitted facility or for an emissions unit within the facility, whether expressed as a rate of emissions or in terms of total emissions;

(3) The Permittee has obtained all permits and approvals required by COMAR 26.11.02 and .03;

(4) The change does not violate an applicable requirement of the Clean Air Act;

(5) The change does not violate a federally enforceable permit term or condition related to monitoring, including test methods, record keeping, reporting, or compliance certification requirements;

(6) The change does not violate a federally enforceable permit term or condition limiting hours of operation, work practices, fuel usage, raw material usage, or production levels if the term or condition has been established to limit emissions allowable under this permit;

(7) If applicable, the change does not modify a federally enforceable provision of a compliance plan or schedule in this Part 70 permit unless the Department has approved the change in writing; and

(8) This permit does not expressly prohibit the change under COMAR 26.11.03.18.

b. The Permittee shall notify the Department and the EPA in writing of a proposed on-permit change under COMAR 26.11.03.18 not later than 7 days before the change is made. The written information shall include the following information:

(1) A description of the proposed change;

(2) The date on which the change is proposed to be made;

(3) Any change in emissions resulting from the change, including the pollutants emitted;

(4) Any new applicable requirement of the Clean Air Act; and

(5) Any permit term or condition that would no longer apply.

c. The responsible official of this facility shall certify in accordance with COMAR 26.11.02.02F that the proposed change meets the criteria for the use of on-permit changes under COMAR 26.11.03.18.

d. The Permittee shall attach a copy of each notice required by condition b. above to this Part 70 permit.

e. On-permit changes that qualify under COMAR 26.11.03.18 are not subject to the requirements for part 70 permit revisions.

f. Upon satisfying the requirements under COMAR 26.11.03.18, the Permittee may make the proposed change.

g. The permit shield in COMAR 26.11.03.23 does not apply to on-permit changes under COMAR 26.11.03.18.

h. The Permittee is subject to enforcement action if it is determined that an on-permit change made under COMAR 26.11.03.18 is not within the scope of the regulation or violates any requirement of the State air pollution control law.

17. FEE PAYMENT

[COMAR 26.11.02.16A(2) & (5)(b)]

a. The fee for this Part 70 permit is as prescribed in Regulation .19 of COMAR 26.11.02.

b. The fee is due on and shall be paid on or before each 12-month anniversary date of the permit.

c. Failure to pay the annual permit fee constitutes cause for revocation of the permit by the Department.

18. REQUIREMENTS FOR PERMITS-TO-CONSTRUCT AND APPROVALS

[COMAR 26.11.02.09.]

The Permittee may not construct or modify or cause to be constructed or modified any of the following sources without first obtaining, and having in current effect, the specified permits-to-construct and approvals:

a. New Source Review source, as defined in COMAR 26.11.01.01, approval required, except for generating stations constructed by electric companies;

b. Prevention of Significant Deterioration source, as defined in COMAR 26.11.01.01, approval required, except for generating stations constructed by electric companies;

c. New Source Performance Standard source, as defined in COMAR 26.11.01.01, permit to construct required, except for generating stations constructed by electric companies;

d. National Emission Standards for Hazardous Air Pollutants source, as defined in COMAR 26.11.01.01, permit to construct required, except for generating stations constructed by electric companies;

e. A stationary source of lead that discharges one ton per year or more of lead or lead compounds measured as elemental lead, permit to construct required, except for generating stations constructed by electric companies;

f. All stationary sources of air pollution, including installations and air pollution control equipment, except as listed in COMAR 26.11.02.10, permit to construct required;

g. In the event of a conflict between the applicability of (a.— e.) above and an exemption listed in COMAR 26.11.02.10, the provision that requires a permit applies.

h. Approval of a PSD or NSR source by the Department does not relieve the Permittee obtaining an approval from also obtaining all permits-to-construct required b y (c.— g.) above.

19. CONSOLIDATION OF PROCEDURES FOR PUBLIC PARTICIPATION

[COMAR 26.11.02.11C] and [COMAR 26.11.03.01K]

The Permittee may request the Department to authorize special procedures for the Permittee to apply simultaneously, to the extent possible, for a permit to construct and a revision to this permit.

These procedures may provide for combined public notices, informational meetings, and public hearings for both permits but shall not adversely affect the rights of a person, including EPA and affected states, to obtain information about the application for a permit, to comment on an application, or to challenge a permit that is issued.

These procedures shall not alter any existing permit procedures or time frames.

20. PROPERTY RIGHTS

[COMAR 26.11.03.06E(4)]

This Part 70 permit does not convey any property rights of any sort, or any exclusive privileges.

21. SEVERABILITY

[COMAR 26.11.03.06A(5)]

If any portion of this Part 70 permit is challenged, or any term or condition deemed unenforceable, the remainder of the requirements of the permit continues to be valid.

22. INSPECTION AND ENTRY

[COMAR 26.11.03.06G(3)]

The Permittee shall allow employees and authorized representatives of the Department, the EPA, and local environmental health agencies, upon presentation of credentials or other documents as may be required by law, to:

a. Enter at a reasonable time without delay and without prior notification the Permittee's property where a Part 70 source is located, emissions-related activity is conducted, or records required by this permit are kept;

b. Have access to and make copies of records required by the permit;

c. Inspect all emissions units within the facility subject to the permit and all related monitoring systems, air pollution control equipment, and practices or operations regulated or required by the permit; and

d. Sample or monitor any substances or parameters at or related to the emissions units at the facility for the purpose of determining compliance with the permit.

23. DUTY TO PROVIDE INFORMATION

[COMAR 26.11.03.06E(5)]

The Permittee shall furnish to the Department, within a reasonable time specified by the Department, information requested in writing by the Department in order to determine whether the Permittee is in compliance with the federally enforceable conditions of this Part 70 permit, or whether cause exists for revising or revoking the permit. Upon request, the Permittee shall also furnish to the Department records required to be kept under the permit.

For information claimed by the Permittee to be confidential and therefore potentially not discloseable to the public, the Department may require the Permittee to provide a copy of the records directly to the EPA along with a claim of confidentiality.

The Permittee shall also furnish to the Department, within a reasonable time specified by the Department, information or records requested in writing by the Department in order to determine if the Permittee is in compliance with the State-only enforceable conditions of this permit.

24. COMPLIANCE REQUIREMENTS

[COMAR 26.11.03.06E(1)] and [COMAR 26.11.03.06A(11)] and [COMAR 26.11.02.05]

The Permittee shall comply with the conditions of this Part 70 permit. Noncompliance with the permit constitutes a violation of the Clean Air Act, and/or the Environment Article Title 2 of the Annotated Code of Maryland and may subject the Permittee to:

a. Enforcement action,

b. Permit revocation or revision,

c. Denial of the renewal of a Part 70 permit, or

d. Any combination of these actions.

The conditions in this Part 70 permit are enforceable by EPA and citizens under the Clean Air Act except for the State-only enforceable conditions.

Under Environment Article Section 2-609, Annotated Code of Maryland, the Department may seek immediate injunctive relief against a person who violates this permit in such a manner as to cause a threat to human health or the environment.

25. CREDIBLE EVIDENCE

Nothing in this permit shall be interpreted to preclude the use of credible evidence to demonstrate noncompliance with any term of this permit.

26. NEED TO HALT OR REDUCE ACTIVITY NOT A DEFENSE

[COMAR 26.11.03.06E(2)]

The need to halt or reduce activity in order to comply with the conditions of this permit may not be used as a defense in an enforcement action.

27. CIRCUMVENTION

[COMAR 26.11.01.06]

The Permittee may not install or use any article, machine, equipment or other contrivance, the use of which, without resulting in a reduction in the total weight of emissions, conceals or dilutes emissions which would otherwise constitute a violation of any applicable air pollution control regulation.

28. PERMIT SHIELD

[COMAR 26.11.03.23]

A permit shield as described in COMAR 26.11.03.23 shall apply only to terms and conditions in this Part 70 permit that have been specifically identified as covered by the permit shield. Neither this permit nor COMAR 26.11.03.23 alters the following:

a. The emergency order provisions in Section 303 of the Clean Air Act, including the authority of EPA under that section;

b. The liability of the Permittee for a violation of an applicable requirement of the Clean Air Act before or when this permit is issued or for a violation that continues after issuance;

c. The requirements of the Acid Rain Program, consistent with Section 408(a) of the Clean Air Act;

d. The ability of the Department or EPA to obtain information from a source pursuant to Maryland law and Section 114 of the Clean Air Act; or

e. The authority of the Department to enforce an applicable requirement of the State air pollution control law that is not an applicable requirement of the Clean Air Act.

29. ALTERNATE OPERATING SCENARIOS

[COMAR 26.11.03.06A(9)]

For all alternate operating scenarios approved by the Department and contained within this permit, the Permittee, while changing from one approved scenario to another, shall contemporaneously record in a log maintained at the facility each scenario under which the emissions unit is operating and the date and time the scenario started and ended.

SECTION III PLANT WIDE CONDITIONS

1. PARTICULATE MATTER FROM CONSTRUCTION AND DEMOLITION

[COMAR 26.11.06.03D]

The Permittee shall not cause or permit any building, its appurtenances, or a road to be used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne.

2. OPEN BURNING

[COMAR 26.11.07]

Except as provided in COMAR 26.11.07.04, the Permittee shall not cause or permit an open fire from June 1 through August 31 of any calendar year. Prior to any open burning, the Permittee shall request and receive approval from the Department.

3. AIR POLLUTION EPISODE

[COMAR 26.11.05.04]

When requested by the Department, the Permittee shall prepare in writing standby emissions reduction plans, consistent with good industrial practice and safe operating procedures, for reducing emissions creating air pollution during periods of Alert, Warning, and Emergency of an air pollution episode.

4. REPORT OF EXCESS EMISSIONS AND DEVIATIONS

[COMAR 26.11.01.07] and [COMAR 26.11.03.06C(7)]

The Permittee shall comply with the following conditions for occurrences of excess emissions and deviations from requirements of this permit, including those in Section VI – State-only Enforceable Conditions:

a. Report any deviation from permit requirements that could endanger human health or the environment, by orally notifying the Department immediately upon discovery of the deviation;

b. Promptly report all occurrences of excess emissions that are expected to last for one hour or longer by orally notifying the Department of the onset and termination of the occurrence;

c. When requested by the Department the Permittee shall report all deviations from permit conditions, including those attributed to malfunctions as defined in COMAR 26.11.01.07A, within 5 days of the request by submitting a written description of the deviation to the Department. The written report shall include the cause, dates and times of the onset and termination of the deviation, and an account of all actions planned or taken to reduce, eliminate, and prevent recurrence of the deviation;

d. The Permittee shall submit to the Department semi-annual monitoring reports that confirm that all required monitoring was performed, and that provide accounts of all deviations from permit requirements that occurred during the reporting periods. Reporting periods shall be January 1 through June 30 and July 1 through December 31, and reports shall be submitted within 30 days of the end of each reporting period. Each account of deviation shall include a description of the deviation, the dates and times of onset and termination, identification of the person who observed or discovered the deviation, causes and corrective actions taken, and actions taken to prevent recurrence. If no deviations from permit conditions occurred during a reporting period, the Permittee shall submit a written report that so states.

e. When requested by the Department, the Permittee shall submit a written report to the Department within 10 days of receiving the request concerning an occurrence of excess emissions. The report shall contain the information required in COMAR 26.11.01.07D(2).

5. ACCIDENTAL RELEASE PROVISIONS

[COMAR 26.11.03.03B(23)] and [40 CFR 68]

Should the Permittee become subject to 40 CFR 68 during the term of this permit, the Permittee shall submit risk management plans by the date specified in 40 CFR 68.150 and shall certify compliance with the requirements of 40 CFR 68 as part of the annual compliance certification as required by 40 CFR 70.

The Permittee shall initiate a permit revision or reopening according to the procedures of 40 CFR 70.7 to incorporate appropriate permit conditions into the Permittee's Part 70 permit.

6. GENERAL TESTING REQUIREMENTS

[COMAR 26.11.01.04]

The Department may require the Permittee to conduct, or have conducted, testing to determine compliance with this Part 70 permit. The Department, at its option, may witness or conduct these tests. This testing shall be done at a reasonable time, and all information gathered during a testing operation shall be provided to the Department.

7. EMISSIONS TEST METHODS

[COMAR 26.11.01.04]

Compliance with the emissions standards and limitations in this Part 70 permit shall be determined by the test methods designated and described below or other test methods submitted to and approved by the Department.

Reference documents of the test methods approved by the Department include the following:

a. 40 CFR 60, appendix A

b. 40 CFR 51, appendix M

c. The Department's Technical Memorandum 91-01 "Test Methods and Equipment Specifications for Stationary Sources", (January 1991), as amended through Supplement 3, (October 1, 1997)

8. EMISSIONS CERTIFICATION REPORT

[COMAR 26.11.01.05-1] and [COMAR 26.11.02.19C] and [COMAR 26.11.02.19D]

The Permittee shall certify actual annual emissions of regulated pollutants from the facility on a calendar year basis.

a. The certification shall be on forms obtained from the Department and submitted to the Department not later than April 1 of the year following the year for which the certification is required;

b. The individual making the certification shall certify that the information is accurate to the individual's best knowledge. The individual shall be:

(1) Familiar with each source for which the certifications forms are submitted, and

(2) Responsible for the accuracy of the emissions information;

c. The Permittee shall maintain records necessary to support the emissions certification including the following information if applicable:

(1) The total amount of actual emissions of each regulated pollutant and the total of all regulated pollutants;

(2) An explanation of the methods used to quantify the emissions and the operating schedules and production data that were used to determine emissions, including significant assumptions made;

(3) Amounts, types and analyses of all fuels used;

(4) Emissions data from continuous emissions monitors that are required by this permit, including monitor calibration and malfunction information;

(5) Identification, description, and use records of all air pollution control equipment and compliance monitoring equipment including:

(a) Significant maintenance performed,

(b) Malfunctions and downtime, and
(c) Episodes of reduced efficiency of all equipment;

(6) Limitations on source operation or any work practice standards that significantly affect emissions; and

(7) Other relevant information as required by the Department.

9. COMPLIANCE CERTIFICATION REPORT

[COMAR 26.11.03.06G(6) and (7)]

The Permittee shall submit to the Department and EPA Region III a report certifying compliance with each term of this Part 70 permit including each applicable standard, emissions limitation, and work practice for the previous calendar year by April 1 of each year.

a. The compliance certification shall include:

(1) The identification of each term or condition of this permit which is the basis of the certification;

(2) The compliance status;

(3) Whether the compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of each source, currently and over the reporting period; and

(5) Any other information required to be reported to the Department that is necessary to determine the compliance status of the Permittee with this permit.

b. The Permittee shall submit the compliance certification reports to the Department and EPA simultaneously.

10. CERTIFICATION BY RESPONSIBLE OFFICIAL

[COMAR 26.11.02.02F]

All application forms, reports, and compliance certifications submitted pursuant to this permit shall be certified by a responsible official as to truth, accuracy, and completeness. The Permittee shall expeditiously notify the Department of an appointment of a new responsible official.

The certification shall be in the following form:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

11. SAMPLING AND EMISSIONS TESTING RECORD KEEPING

[COMAR 26.11.03.06C(5)]

The Permittee shall gather and retain the following information when sampling and testing for compliance demonstrations:

a. The location as specified in this permit, and the date and time that samples and measurements are taken;

b. All pertinent operating conditions existing at the time that samples and measurements are taken;

c. The date that each analysis of a sample or emissions test is performed and the name of the person taking the sample or performing the emissions test;

d. The identity of the Permittee, individual, or other entity that performed the analysis;

e. The analytical techniques and methods used; and

f. The results of each analysis.

12. GENERAL RECORDKEEPING

[COMAR 26.11.03.06C(6)]

The Permittee shall retain records of all monitoring data and information that support the compliance certification for a period of five (5) years from the date that the monitoring, sample measurement, application, report or emissions test was completed or submitted to the Department.

These records and support information shall include:

a. All calibration and maintenance records;

b. All original data collected from continuous monitoring instrumentation;

c. Records which support the annual emissions certification; and

d. Copies of all reports required by this permit.

13. GENERAL CONFORMITY

[COMAR 26.11.26.09]

The Permittee shall comply with the general conformity requirements of 40 CFR 93, Subpart B and COMAR 26.11.26.09.

14. ASBESTOS PROVISIONS

[40 CFR 61, Subpart M]

The Permittee shall comply with 40 CFR 61, Subpart M when conducting any renovation or demolition activities at the facility.

15. OZONE DEPLETING REGULATIONS

[40 CFR 82, Subpart F]

The Permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR 82, Subpart F, except as provided for MVACs in subpart B:

a. Persons opening appliances for maintenance, service, repair, or disposal shall comply with the prohibitions and required practices pursuant to 40 CFR 82.154 and 82.156.

b. Equipment used during the maintenance, service, repair or disposal of appliances shall comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

c. Persons performing maintenance, service, repairs or disposal of appliances shall be certified by an approved technician certification program pursuant to 40 CFR 82.161.

d. Persons performing maintenance, service, repairs or disposal of appliances shall certify with the Administrator pursuant to 40 CFR 82.162.

e. Persons disposing of small appliances, MVACS, and MVAC-like appliances as defined in 40 CFR 82.152, shall comply with record keeping requirements pursuant to 40 CFR 82.166.

f. Persons owning commercial or industrial process refrigeration equipment shall comply with the leak repair requirements pursuant to 40 CFR 82.156.

g. Owners/operators of appliances normally containing 50 or more pounds of refrigerant shall keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR 82.166.

16. ACID RAIN PERMIT

Not applicable

SECTION IV PLANT SPECIFIC CONDITIONS

This section provides tables that include the emissions standards, emissions limitations, and work practices applicable to each emissions unit located at this facility. The Permittee shall comply with all applicable emissions standards, emissions limitations and work practices included herein.

The tables also include testing, monitoring, record keeping and reporting requirements specific to each emissions unit. In addition to the requirements included here in **Section IV**, the Permittee is also subject to the general testing, monitoring, record keeping and reporting requirements included in **Section III – Plant Wide Conditions** of this permit.

Unless otherwise provided in the specific requirements for an emissions unit, the Permittee shall maintain at the facility for at least five (5) years, and shall make available to the Department upon request, all records that the Permittee is required under this section to establish. [Authority: COMAR 26.11.03.06C(5)(g)]

Table IV–1 **Facility Wide Requirements**	
1.0	**Emissions Units:** Facility Wide
1.1	**Applicable Standards/Limits:** **Control of VOC Emissions** **COMAR 26.11.19.16C&D** – Control of VOC Equipment Leaks "General Requirements. A person subject to this regulation shall comply with all of the following requirements: (1) Visually inspect all components on the premises for leaks at least once each calendar month. (2) Tag any leak immediately so that the tag is clearly visible. The tag shall be made of a material that will withstand any weather or corrosive conditions to which it may be normally exposed. The tag shall bear an identification number, the date the leak was discovered, and the name of the person who discovered the leak. The tag shall remain in place until the leak has been repaired. (3) Take immediate action to repair all observed VOC leaks that can be repaired within 48 hours. (4) Repair all other leaking components not later than 15 days after the leak is discovered. If a replacement part is needed, the part shall be ordered within 3 days after discovery of the leak, and the leak shall be repaired within 48 hours after receiving the part.

Table IV–1 **Facility Wide Requirements**	
	(5) Maintain a supply of components or component parts that are recognized by the source to wear or corrode, or that otherwise need to be routinely replaced, such as seals, gaskets, packing, and pipefitting. (6) Maintain a log that includes the name of the person conducting the inspection and the date on which leak inspections are made, the findings of the inspection, and a list of leaks by tag identification number. The log shall be made available to the Department upon request. Leak records shall be maintained for a period of not less than 2 years from the date of their occurrence." "Exceptions. Components that cannot be repaired as required in this regulation because they are inaccessible, or that cannot be repaired during operation of the source, shall be identified in the log and included within the source's maintenance schedule for repair during the next source shutdown."
1.2	**Testing Requirements:** **Control of VOC Emissions** See monitoring requirements in Section 1.3
1.3	**Monitoring Requirements:** **Control of VOC Emissions** The Permittee shall visually inspect all components on the premises for VOC leaks at least once each calendar month following the procedures specified in COMAR 26.11.19.16C and D.
1.4	**Record Keeping Requirements:** **Note**: All records must be maintained onsite for a period of at least 5 years and shall be made available to the Department upon request. **[Reference: COMAR 26.11.03.06C(5)(g)]** **Control of VOC Emissions** The Permittee shall: 1) Maintain a log that includes the name of the person conducting the inspection, the date on which VOC leak inspections was made, the findings of the inspection, a list of VOC leaks by tag identification number, the date the part was ordered, and the date the VOC leak was repaired; and

Table IV–1 Facility Wide Requirements	
	2) Make the log available to the Department upon request and shall be maintained for a period of not less than two years from the date of the VOC leaks' occurrence. **[Reference: COMAR 26.11.19.16C(6)]**
1.5	**Reporting Requirements:** **Control of VOC Emissions** VOC leak inspection logs as required by COMAR 26.11.19.16 shall be made available to the Department upon request.

A permit shield shall cover the applicable requirements identified for the emission units listed in the table above.

Table IV–2 Flexographic Presses	
2.0	**Emissions Units:** **EU 11 Press #69 MDE Reg. No. 6-3017** 16-inch, 10-color Mark Andy flexographic heat-set press using water-based inks, installed in 2011. **EU 12 Press#66 MDE Reg. No. 6-2825** 16-inch, 10-color COMCO Pro-Glide flexographic heat-set press using water-based inks, installed in 2005. **EU 13 Press#68 MDE Reg. No. 6-2936** 13-inch, 10-color Mark Andy LP3000 flexographic printing press equipped with a UV curing system on one color unit, installed in 2008. **EU-14 Press #70 MDE Reg. No. 6-3123** 16-inch, 10-color Mark Andy flexographic heat-set web press using water-based and UV inks, installed in 2015.
2.1	**Applicable Standards/Limits:** **Control of VOC Emissions** **COMAR 26.11.19.10C** – Requirements for Sheet-Fed or Web-Fed Flexographic, Packaging Rotogravure, and Publication Rotogravure Printing.

Table IV–2 **Flexographic Presses**	
	"A person who owns or operates a printing press that uses flexographic, packaging rotogravure, or publication rotogravure methods and is a major stationary source as defined in Regulation .01B(4) of this chapter, shall: (1) Reduce emissions by using water-based inks that contain less than 25 percent VOC by volume of volatile portion of the ink, or high solids inks that contain not less than 60 percent nonvolatile; or (2) If compliance with the requirements of Sec. C(1) of this regulation cannot be achieved, reduce the VOC content of each ink, or reduce the average VOC content of inks used at each press as follows: a. 60 percent reduction for flexographic presses, b. 65 percent reduction for packaging rotogravure presses, and c. 75 percent reduction for publication rotogravure presses."
2.2	**Testing Requirements:** **Control of VOC Emissions** See Record keeping requirements in Section 3.4.
2.3	**Monitoring Requirements:** **Control of VOC Emissions** See Record keeping requirements in Section 3.4.
2.4	**Record Keeping Requirements:** **Note:** All records must be maintained onsite for a period of at least 5 years and shall be made available to the Department upon request. **[Reference: COMAR 26.11.03.06C(5)(g)]** **Control of VOC Emissions** The Permittee shall: (1) Maintain MSD sheets or other manufacturer's certified product sheets for each material used where the VOC content specified on MSD or product sheets has been determined based on EPA Reference Method 24 or an equivalent methodology approved by the Department; and (2) Maintain records pertaining to the low solvent or high solids characteristics of VOC materials used that are adequate to demonstrate that emissions are below the applicable threshold as stated in COMAR 26.11.19.10C(1). **[Reference: COMAR 26.11.03.06C]**

Table IV–2 **Flexographic Presses**	
2.5	**Reporting Requirements:** **Control of VOC Emissions** The Permittee shall report the quantity and identity of all VOC- containing materials that are used during a year in the annual emissions certification report. **[Reference: COMAR 26.11.03.06C]**

A permit shield shall cover the applicable requirements identified for the emission units listed in the table above.

Table IV–3 **Sheet-Fed Lithographic Presses**	
3.0	**Emissions Units:** **EU 15 Press# 30 MDE Reg. No. 6-3194** 40-inch, 8-color sheet-fed lithographic press, installed in 2019. **EU 8 Press#40 MDE Reg. No. 6-1983** 29-inch, 8-color lithographic printing press with aqueous coater and UV ink capability, installed in 1993. **EU 5 Press#42 MDE Reg. No. 6-2156** 8-color Heidelberg CD sheet-fed lithographic press with a coating tower, installed in 1995. **EU10 Press#44 MDE Reg. No. 6-2377** 2- color Heidelberg sheet-fed lithographic press, installed in 1998.
3.1	**Applicable Standards/Limits:** **Control of VOC Emissions** **A. COMAR 26.11.19.11C** – Standards for Sheet-Fed Lithographic Printing. "A person may not operate a sheet-fed letter or lithographic press with a cylinder width of 18 inches or greater unless: (1) The fountain solution is refrigerated to maintain a temperature of less than 55° F if isopropyl alcohol is used;

Table IV–3 **Sheet-Fed Lithographic Presses**	
	(2) A temperature indicator is installed to monitor the fountain temperature if the solution is refrigerated; and (3) The fountain solution contains less than 8.5 percent isopropyl alcohol by weight." **B. COMAR 26.11.19.11F** – Requirements for Cleaning Materials. "(1) A person who owns or operates a lithographic press or letterpress shall comply with this section. (2) A person subject to this regulation may use up to a total of 110 gallons per calendar year of cleaning solutions at a premises without regard to VOC content. (3) A person subject to this regulation that uses any cleaning solution at a premises excluding the 110 gallons per calendar year specified in §F(2) shall ensure that the additional cleaning solution: (a) Has a composite vapor pressure of less than 10 mm of mercury at 68º F (20ºC); or (b) Contains less than 70 percent VOC by weight."
3.2	**Testing Requirements:** **Control of VOC Emissions** **A.** The temperature sensors installed to measure the fountain solution temperature shall be checked with a calibrated thermometer at least once every six months if IPA is used. The results of the measurement and the deviation of the temperature gage from the thermometer reading shall be recorded. **[Reference: COMAR 26.11.03.06C]** **B.** The Permittee shall perform tests when required as part of an evaluation requested by the Department of non-VOC and low VOC cleanup materials. **[Reference: COMAR 26.11. 19.11E(4)]**
3.3	**Monitoring Requirements:** **Control of VOC Emissions** **A.** The fountain solution temperature of any press using isopropyl alcohol in the fountain solution shall be checked once each day the press is operating and the results recorded. **[Reference: COMAR 26.11.03.06C]** If isopropyl alcohol is used on any press, the Permittee shall have readily available for the operator of that press and environmental

Table IV–3 **Sheet-Fed Lithographic Presses**	
	inspectors a hydrometer calibrated in percent isopropyl alcohol for the purpose of checking the alcohol content of the fountain solution. A hydrometer reading shall be taken and recorded each time after alcohol is added to the fountain solution. If the alcohol content of the fountain solution is regulated automatically, a hydrometer reading shall be taken and recorded at least once every operating shift. **[Reference: COMAR 26.11.03.06C]** **B. COMAR 26.11.19.11E(3)** – The Permittee shall perform an inspection once a month to verify compliance with the requirement to store waste and other materials that contain VOC in closed containers and maintain lids on VOC cleanup materials storage.
3.4	**Record Keeping Requirements:** **Note:** All records must be maintained onsite for a period of at least 5 years and shall be made available to the Department upon request. **[Reference: COMAR 26.11.03.06C(5)(g)]** **Control of VOC Emissions** **A.** The Permittee shall maintain: (1) Daily records of fountain solution temperature for fountain solutions containing isopropyl alcohol. **[Reference: COMAR 26.11.03.06C]** (2) Copies of the MSD Sheets or VOC data sheets that show the quantity of VOC in the inks and fountain solutions calculated using EPA Reference Method 24 or equivalent. **[Reference: COMAR 26.11.03.06C]** (3) Monthly records of hours of operation for each press and total material usage. **[Reference: MDE PTC Nos. 03-6-2156N, 005-6-2818N, 03-6-1983N, 03-6-2634N, and 03-6-2377N]** Additional Record keeping Requirements. “A person subject to this regulation shall maintain records on site including the following information: (1) The fountain solution formulations; (2) The VOC content, in percent VOC by weight, of the fountain solutions; (3) The temperature of the press fountain solutions for lithographic printing presses using alcohol in the fountain solution; and (4) The quantity of cleaning solutions used and their vapor pressure or percentage VOC concentration by weight.” **[Reference: COMAR 26.11.19.11H]**

Table IV–3 **Sheet-Fed Lithographic Presses**	
	B. The Permittee shall: (1) Keep a written copy of the good operating practices manual; (2) Maintain a record of the results of the monthly inspections performed to verify that good operating practices are implemented; and (3) Keep records of the results of any clean-up materials study, which was requested by the Department. **[Reference: COMAR 26.11.19.11E(3) and COMAR 26.11.03.06C]**
3.5	**Reporting Requirements:** **Control of VOC Emissions** **A.** The Permittee shall report the quantity and identity of all VOC-containing materials that are used during a year in the annual emissions certification report. **[Reference: COMAR 26.11.03.06C]** **B.** The Permittee shall report the results of any clean-up materials study requested by the Department. **[Reference: COMAR 26.11.19.11E(4)]**

A permit shield shall cover the applicable requirements identified for the emission units listed in the table above.

SECTION V INSIGNIFICANT ACTIVITIES

This section provides a list of insignificant emissions units that were reported in the Title V permit application. The applicable Clean Air Act requirements, if any, are listed below the insignificant activity.

(1) ✓ Space heaters utilizing direct heat transfer and used solely for comfort heat;

(2) ✓ Water cooling towers and water cooling ponds unless used for evaporative cooling of water from barometric jets or barometric condensers, or used in conjunction with an installation requiring a permit to operate;

(3) No. 10 Unheated VOC dispensing containers or unheated VOC rising containers of 60 gallons (227 liters) capacity or less;

(4) Containers, reservoirs, or tanks used exclusively for:

(a) No. 1 Storage of lubricating oils;
(b) No. 50 The storage of VOC normally used as solvents, diluents, thinners, inks, colorants, paints, lacquers, enamels, varnishes, liquid resins, or other surface coatings and having individual capacities of 2,000 gallons (7.6 cubic meters) or less;

(5) ✓ Non-contact water (i.e., water that has not been in direct contact with process fluids) cooling towers except as regulated under Section 112 of the Clean Air Act;

(6) Any other emissions unit at the facility which is not subject to an applicable requirement of the Clean Air Act :

No. 1 Paper cutting, collating, folding, binding, and gluing equipment associated with the printing press lines.

No. 1 EU4 41 gallon Solvent Wash Tank in Gravure Press Room. Emission unit EU-4 consists of a solvent wash tank located in the gravure press room. This solvent wash tank is used to clean press components from the gravure press. The solvent wash tank is equipped with a lid that remains closed when the unit is not in operation to suppress the evaporative emissions from the cleaning solvent. The solvent wash tank was installed prior to 1995.

SECTION VI STATE-ONLY ENFORCEABLE CONDITIONS

The Permittee is subject to the following State-only enforceable requirements:

1. Applicable Regulations:

   (A) COMAR 26.11.06.08 – Nuisance.
   "An installation or premises may not be operated or maintained in such a manner that a nuisance or air pollution is created. Nothing in this regulation relating to the control of emissions may in any manner be construed as authorizing or permitting the creation of, or maintenance of, nuisance or air pollution."

   (B) COMAR and 26.11.06.09 – Odors.
   "A person may not cause or permit the discharge into the atmosphere of gases, vapors, or odors beyond the property line in such a manner that a nuisance or air pollution is created."

   (C) COMAR 26.11.15.05A – Control Technology Requirement.
   "A person may not construct, reconstruct, operate, or cause to be constructed, reconstructed, or operated, any new installation or source that will discharge a toxic air pollutant to the atmosphere without installing and operating T-BACT."

   (D) COMAR 26.11.15.06A(1) – Ambient Impact Requirement.
   (1) "Except as provided in §A(2) of this regulation, a person may not construct, modify, or operate, or cause to be constructed, modified, or operated, any new installation or source without first demonstrating to the satisfaction of the Department using procedures established in this chapter that total allowable emissions from the premises of each toxic air pollutant discharged by the new installation or source will not unreasonably endanger human health.

   (2) If a new installation or source will discharge a TAP that is not listed in COMAR 26.11.16.07 and will be part of an existing premises, then emissions of that TAP from existing sources or existing installations on the premises may be omitted from a screening analysis unless the TAP is added to COMAR 26.11.16.07."

2. Operating Conditions:

   The Permittee shall comply with the requirements stated in COMAR 26.11.19.02I & COMAR 26.11.19.11E, use low solvent inks, and shall not use isopropyl alcohol in the fountain solutions in order to satisfy the T-BACT requirement of COMAR 26.11.15.05. **[PTC 005-6-2825N Issued on May 13, 2005]**

3. Record Keeping and Reporting:

   The Permittee shall submit to the Department, by April 1 of each year during the term of this permit, a written certification of the results of an analysis of emissions of toxic air pollutants from the Permittee's facility during the previous calendar year. The analysis shall include either:

   (a) a statement that previously submitted compliance demonstrations for emissions of toxic air pollutants remain valid; or

   (b) a revised compliance demonstration, developed in accordance with requirements included under COMAR 26.11.15 & 16, that accounts for changes in operations, analytical methods, emissions determinations, or other factors that have invalidated previous demonstrations.

JENKINS
ENVIRONMENTAL, INC.

November 25, 2019

Mrs. Suná Yi Sariscak, Acting Chief
Technical Support Division
Air Quality Permits Program
Air and Radiation Management Administration
Maryland Department of the Environment
1800 Washington Blvd., Suite 720
Baltimore, Maryland 21230

RE: Part 70 Title V Permit Renewal
Gamse Lithographing Company
Permit Number: **24-005-1149**; AI Number: **2143**

Dear Ms. Sarisack:

Enclosed are two (2) hard copies and one (1) electronic pdf version of the Part 70 (Title V) Permit Renewal Application which are being submitted on behalf of Gamse Lithographing Co., Inc. The original due date of October 1, 2019 was extended by the Department to December 1, 2019 per attached request and response.

If you have any questions pertaining to the enclosed material, please feel free to contact Jenkins Environmental, Inc at (410) 828-9888.

Sincerely,

JENKINS ENVIRONMENTAL, INC

Michael J. Cirri
President

Encl.

Cc: Matthew Haynes – Director of Quality Assurance, Gamse Lithographing Co., Inc.

8600 La Salle Road • York Building, Suite 509 • Towson, Maryland 21286
410.828.9888 (Phone) • 410.828.9899 (Fax) • 1.888.473.8200 (Toll-Free)

JENKINS
ENVIRONMENTAL, INC.

August 19, 2019

Mrs. Suna Yi Sariscak, Acting Chief
Technical Support Division
Air Quality Permits Program
Air and Radiation Management Administration
Maryland Department of the Environment
1800 Washington Blvd., Suite 720
Baltimore, Maryland 21230

RE: Gamse Lithographing Company
Permit Number: **24-005-1149**; AI Number: **2143**
Part 70 Title V Permit Renewal – Extension Request

Dear Mrs. Sarisak:

Jenkins Environmental, Inc. (JEI), on behalf of Gamse Lithographing Company, respectfully requests an extension of the referenced permit renewal application from October 1, 2019 to December 1, 2019. The additional time is needed to fully assess the Company's potential-to-emit and production/process changes that continue utilizing less solvent-based materials.

Upon receipt of the Department's decision JEI will proceed accordingly.

Sincerely,

JENKINS ENVIRONMENTAL, INC.

Michael J. Cirri
President

Cc: Matthew Haynes (V.P. Gamse Lithographing Co.)
Mario Cora (MDE)

8600 La Salle Road • York Building, Suite 509 • Towson, Maryland 21286
410.828.9688 (Phone) • 410.828.9699 (Fax) • 1.888.873.8200 (Toll-Free)

Michael Cirri

From: Mario Cora -MDE- [mario.cora@maryland.gov]
Sent: Monday, August 19, 2019 2:21 PM
To: Michael Cirri
Cc: Matt Haynes; Suna Yi Sariscak -MDE; Bill Paul -MDE-; Christopher Mentzer
Subject: Re: GAMSE LITHOGRAPHING CO. (GAMSE)

19 August 2019

Mr. Cirri

Good afternoon

I was able to consult here and we could work around the proposed schedule that you proposed in the letter dated August 19, 2019 received at our offices via email.

It is our understanding that this request in part respond to the question that was stated earlier this summer with regards to whether or not this facility will be synthetic minor or if it will continue under the Title V permit program in the near future. Once your facility has determined the most recent potential to emit, and projected actual emission, we would need either a Title V renewal application or a synthetic minor application. Notice that once and if a synthetic minor PTC is required, such action will be followed by a PTO.

Nevertheless, in either case a permit application will be needed as proposed in the proposed schedule as stated above.

Thanks,

Mario Cora

On Mon, Aug 19, 2019 at 9:50 AM Michael Cirri <mcirri@jeinc.org> wrote:

Mario:

Per your request see attached letter. I will await the Department's decision regarding the extension request.

Regards,

Mike

Michael J. Cirri

President/Chief Financial Officer

Jenkins Environmental, Inc.

8600 LaSalle Road

York Building, Suite 509

Towson, MD 21286

410.828.9888 - Phone

410.828.9899 - Fax

1.888.473.8200 - Toll Free

mcirri@jeinc.org - Email

From: Mario Cora -MDE-
Sent: Thursday, August 15, 2019 12:21 PM
To: Michael Cirri <mcirri@jeinc.org>
Cc: Matt Haynes <mhaynes@gamse.com>; Suna Yi Sariscak -MDE <suna.sariscak@maryland.gov>; Bill Paul -MDE- <bill.paul@maryland.gov>; Christopher Mentzer <christopher.mentzer@maryland.gov>
Subject: Re: GAMSE LITHOGRAPHING CO. (GAMSE)

15 August 2019

Mr. Cirri

Good afternoon and thanks for this information.

I would that probably the extension can be granted. At the same time, I would suggest if possible to write and sent us a letter with the request by the company representatives. The letter can be send both electronically and later in hard copy.

Gamse Lithographing Co, Inc. Part 70 Permit Renewal Application

Prepared for:

Gamse Lithographing Co., Inc.
7413 Pulaski Highway
Baltimore, Maryland 21237

Prepared by:

Jenkins Environmental, Inc.
8600 La Salle Road
York Building, Suite 509
Towson, MD 21286
410-828-9888

November 2019

Section 1

Certification Statements

MARYLAND DEPARTMENT OF THE ENVIRONMENT
1800 Washington Boulevard ● Baltimore MD 21230
(410) 537-3000 ● 1-800-633-6101 ● http://www.mde.state.md.us

PART 70 PERMIT APPLICATION FOR RENEWAL
AIR AND RADIATION MANAGEMENT ADMINISTRATION

Facilities required to obtain a Part 70 permit under COMAR 26.11.03.01 must complete and return this form. Applications are incomplete unless all applicable information required by COMAR 26.11.03.03 and 26.11.03.13 is supplied. Failure to supply additional information required by the Department to enable it to act on the application may result in loss of the application shield and denial of this application.

Owner and Operator:

Name of Owner or Operator: GAMSE LITHOGRAPHING COMPANY, INC.		
Street Address: 7413 PULASKI HIGHWAY		
City: BALTIMORE	State: MD	Zip Code: 21237-2529
Telephone Number: (410) 866-4700		Fax Number: (410) 866-5672

Facility Information:

Name of Facility: GAMSE LITHOGRAPHING COMPANY, INC.		
Street Address: 7413 PULASKI HIGHWAY		
City: BALTIMORE	State: MD	Zip Code: 21237-2529
Plant Manager: MATTHEW HAYNES	Telephone Number: (410) 866-4700	Fax Number: (410) 866-5672
24-Hour Emergency Telephone Number for Air Pollution Matters: (410) 866-4700		

List, on a separate page, the names and telephone numbers of other facility owners and persons with titles.

SECTION 1. CERTIFICATION STATEMENTS

1. Compliance Status with Applicable Enhanced Monitoring and Compliance Certification Requirements

The emissions units identified in this application are in compliance with applicable enhanced monitoring and compliance certification requirements.

2. Certification of Current Compliance with All Applicable Federally Enforceable Requirements

Except for the requirements identified in Section 7 of this application, for which compliance is not achieved, I hereby certify, based on information and belief formed after reasonable inquiry, that the facility is currently in compliance with all applicable federally enforceable requirements and agree that the facility will continue to comply with those requirements during the permit term.

You must complete a Section 7 form for each non-complying emissions unit.

3. Statement of Compliance with Respect to All New Applicable Requirements Effective During the Permit Term

I hereby state, based on information and belief formed after reasonable inquiry, that the facility agrees to meet, in a timely manner, all applicable federally enforceable requirements that become effective during the permit term, unless a more detailed schedule is expressly required by the applicable requirement.

4. Risk Management Plan Compliance

I hereby certify that, based on information and belief formed after reasonable inquiry, that a Risk Management Plan as required under 112(r) of the Clean Air Act:

[ ] has been submitted;

[ ] will be submitted at a future date; or

[X]does not need to be submitted.

5. Statement of Truth, Accuracy, and Completeness

"I certify, under penalty of law, that this document and all attachments were prepared under my direction or supervision and in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person(s) who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

RESPONSIBLE OFFICIAL:

X_____

SIGNATURE DATE

MATTHEW HAYNES_____
PRINTED NAME

DIRECTOR OF QUALITY ASSURANCE
TITLE

2018 Emissions Certification Report

AI#2143

Gamse Lithographing Company
7431 Pulaski Highway
Baltimore, MD 21237

Prepared by:

Jenkins Environmental, Inc.
8600 LaSalle Road, Suite 509
Towson, MD 21286

March 25, 2019

MARYLAND DEPARTMENT OF THE ENVIRONMENT
1800 Washington Boulevard, Suite 715 • Baltimore Maryland 21230-1720
410-537-3000 • 1-800-633-6101 • http://www.mde.state.md.us
Air and Radiation Management Administration
Air Quality Compliance Program
410-537-3220

FORM 1:

GENERAL FACILITY INFORMATION
EMISSIONS CERTIFICATION REPORT

Calendar Year: **2018**

A. FACILITY IDENTIFICATION Facility Name **GAMSE LITOGRAPHING COMPANY**	**Do Not Write in This** Date Received Regional
Address **7413 PULASKI HIGHWAY**	Date Received State
City **BALTIMORE** County **NA** Zip Code **21237**	AIRS Code
B. Briefly describe the major function of the facility	FINDS Code
Commercial printing of printed labels for food products; beverages using lithographic	SIC Code
and flexographic printing methods	Facility Number:
	TEMPO ID:
C. SEASONAL PRODUCTION (%, if applicable)	Reviewed by:

Winter *(Dec.-Feb.)*	Spring *(Mar – May)*	Summer *(Jun – Aug)*	Fall *(Sept – Nov)*
____25____	_____25_____	_____25_____	_____25_____

Name

D. Explain any increases or decreases in emissions from the previous calendar year for each registration at this facility.

VOC emissions are reduced by approximately 11 tons from 2017 due to shutdown of Rotogravure Press and T.O. along with increased quantities and use of low VOC/aqueous flexographic inks and coatings.

Facility is in compliance with COMAR 26.11.15.06 Ambient Impact Requirement (Toxic Air Pollutants)

E. CONTROL DEVICE INFORMATION (for NOx and VOC sources only)

Control Device	Capture Efficiency	Removal Efficiency

I am familiar with the facility and the installations and sources for which this report is submitted. I have personally examined the information in this report, which consists of ____ pages (including attachments), and certify that the information is correct to the best of my knowledge.

Matthew Haynes **Director of Quality Assurance** **3/ /19**

Name (Print/Type) Title Date

(410) 866-4700

Signature Telephone

1/09/08

FORM 2:

CRITERIA AIR POLLUTANTS
EMISSIONS CERTIFICATION REPORT

Calendar Year: 2018

Facility Name: GAMSE LITHOGRAPHING CO. Facility ID: AI #2143 Pollutant: VOC

Equipment Description/ Registration No.	SCC Number	Fuel		Actual Emissions		Operating Schedule (Actual)				TOSD	Operating Schedule			Emissions Methods
				Tons/yr	Lbs/day	Hrs/dy	Dys/wk	Wk/yr	Days/yr	Lbs/dy	Hrs/dy	Start	End	
9-0159 **OUT OF SERVICE**			S	0.00	0.00					0.00				
CATOX			F											
9-0159 (#47) **OUT OF**			S	0.00	0.00					0.00				
6-C GRAVURE **SERVICE**			F	0.00	0.00					0.00				
6-1983 (#40)			S			16	5	52	260		16	0600	2200	
8-C HEIDELBERG			F	2.82	21.66					21.66				C2,C3
6-2634 (#41)			S			16	5	52	260		16	0600	2200	
8-C S/F LITHO			F	2.99	23.00					23.00				C2,C3
6-2156 (#42)			S			16	5	52	260		16	0600	2200	
8-C HEIDELBERG			F	3.12	24.03					24.03				C2,C3
6-2376 (#43)			S			16	5	52	260		16	0600	2200	
JOHN WALTON			F	0.43	3.34					3.34				C2,C3
6-2377 (#44)			S			16	5	52	260		16	0600	2200	
2-C HEIDELBERG			F	1.46	11.20					11.20				C2,C3
6-2818 (#46) **OUT OF**			S											
6-C S/F **SERVICE**			F	0.00	0.00					0.00				
6-2825 (#66)			S			16	5	52	260		16	0600	2200	
FLEXO			F	2.04	15.73					15.73				C2,C3
6-2936 (#68)			S			16	5	52	260		16	0600	2200	
FLEXO			F	1.08	8.29					8.29				C2,C3
Total				SEE NEXT	PAGE									

S - Stack Emissions F - Fugitive Emissions Daily emissions (lbs/day) are lbs/operating day of the source

TOSD: Typical Ozone Season Day means a typical day of that period of the year during which conditions for photochemical conditions are most favorable, which is generally during sustained periods of direct sunlight and warm temperatures (April-September). This section needs to be completed only for VOC and NOx sources.

Fuel: Include emissions for each fuel used. If more than one fuel is used, calculate and list emissions separately for each fuel.

Emission Estimation Method

A1-U.S. EPA Reference Method
A2-Other Particulate Sampling Train
A3-Liquid Absorption Technique
A4-Solid Absorption Technique
A5-Freezing Out Technique
A9-Other, Specify

C1-User calculated based on source test or other measurement
C2-User calculated based on material balance using engineering knowledge of the process
C3-User calculated based on AP-42
C4-User calculated by best guess/engineering Judgment

C5-User calculated based on a State or local agency emission factor
C6-New construction, not operational
C7-Source closed, operation ceased
C8-Computer calculated based on standard

FORM 2:

CRITERIA AIR POLLUTANTS
EMISSIONS CERTIFICATION REPORT

Calendar Year: 2018

Facility Name: GAMSE LITHOGRAPHING CO. Facility ID: AI #2143 Pollutant: VOC

Equipment Description/ Registration No.	SCC Number	Fuel		Actual Emissions		Operating Schedule (Actual)				TOSD	Operating Schedule			Emissions Methods
				Tons/yr	Lbs/day	Hrs/dy	Dys/wk	Wk/yr	Days/yr	Lbs/dy	Hrs/dy	Start	End	
6-3017 (#69)			S			16	5	52	260		16	0600	2200	
FLEXO - MARK ANDY			F	2.54	19.54					19.54				C2, C3
6-3123 (#70)			S			16	5	52	260		16	0600	2200	
FLEXO			F	2.51	19.29					19.29				C2, C3
			S											
			F											
			S											
			F											
			S											
			F											
			S											
			F											
			S											
			F											
			S											
			F											
			S											
			F											
			S											
			F											
Total				18.99	146.08					146.08				

S - Stack Emissions F - Fugitive Emissions Daily emissions (lbs/day) are lbs/operating day of the source

TOSD: Typical Ozone Season Day means a typical day of that period of the year during which conditions for photochemical conditions are most favorable, which is generally during sustained periods of direct sunlight and warm temperatures (April-September). This section needs to be completed only for VOC and NOx sources.

Fuel: Include emissions for each fuel used. If more than one fuel is used, calculate and list emissions separately for each fuel.

Emission Estimation Method

A1-U.S. EPA Reference Method
A2-Other Particulate Sampling Train
A3-Liquid Absorption Technique
A4-Solid Absorption Technique
A5-Freezing Out Technique
A9-Other, Specify

C1-User calculated based on source test or other measurement
C2-User calculated based on material balance using engineering knowledge of the process
C3-User calculated based on AP-42
C4-User calculated by best guess/engineering Judgment

C5-User calculated based on a State or local agency emission factor
C6-New construction, not operational
C7-Source closed, operation ceased
C8-Computer calculated based on standard

FORM 2:

CRITERIA AIR POLLUTANTS
EMISSIONS CERTIFICATION REPORT

Calendar Year: 2018

Facility Name: GAMSE LITHOGRAPHING CO. Facility ID: AI #2143 Pollutant: NOx

Equipment Description/ Registration No.	SCC Number	Fuel		Actual Emissions		Operating Schedule (Actual)				TOSD	Operating Schedule			Emissions Methods
				Tons/yr	Lbs/day	Hrs/dy	Dys/wk	Wk/yr	Days/yr	Lbs/dy	Hrs/dy	Start	End	
9-0159 **OUT OF SERVICE**		GAS	S	0.0	0.0									
CATOX			F											
			S											
			F											
			S											
			F											
			S											
			F											
			S											
			F											
			S											
			F											
			S											
			F											
			S											
			F											
			S											
			F											
			S											
			F											
Total														

S - Stack Emissions F - Fugitive Emissions Daily emissions (lbs/day) are lbs/operating day of the source

TOSD: Typical Ozone Season Day means a typical day of that period of the year during which conditions for photochemical conditions are most favorable, which is generally during sustained periods of direct sunlight and warm temperatures (April-September). This section needs to be completed only for VOC and NOx sources.

Fuel: Include emissions for each fuel used. If more than one fuel is used, calculate and list emissions separately for each fuel.

Emission Estimation Method

A1-U.S. EPA Reference Method
A2-Other Particulate Sampling Train
A3-Liquid Absorption Technique
A4-Solid Absorption Technique
A5-Freezing Out Technique
A9-Other, Specify

C1-User calculated based on source test or other measurement
C2-User calculated based on material balance using engineering knowledge of the process
C3-User calculated based on AP-42
C4-User calculated by best guess/engineering Judgment

C5-User calculated based on a State or local agency emission factor
C6-New construction, not operational
C7-Source closed, operation ceased
C8-Computer calculated based on standard

FORM 2:

CRITERIA AIR POLLUTANTS
EMISSIONS CERTIFICATION REPORT

Calendar Year: 2018

Facility Name: GAMSE LITHOGRAPHING CO. Facility ID: AI #2143 Pollutant: SOx

Equipment Description/ Registration No.	SCC Number	Fuel		Actual Emissions		Operating Schedule (Actual)				TOSD	Operating Schedule			Emissions Methods
				Tons/yr	Lbs/day	Hrs/dy	Dys/wk	Wk/yr	Days/yr	Lbs/dy	Hrs/dy	Start	End	
9-0159 **OUT OF SERVICE**		GAS	S	0.0	0.0									
CATOX			F											
			S											
			F											
			S											
			F											
			S											
			F											
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			F											
			S											
			F											
			S											
			F											
Total														

S - Stack Emissions F - Fugitive Emissions Daily emissions (lbs/day) are lbs/operating day of the source

TOSD: Typical Ozone Season Day means a typical day of that period of the year during which conditions for photochemical conditions are most favorable, which is generally during sustained periods of direct sunlight and warm temperatures (April-September). This section needs to be completed only for VOC and NOx sources.

Fuel: Include emissions for each fuel used. If more than one fuel is used, calculate and list emissions separately for each fuel.

Emission Estimation Method

A1-U.S. EPA Reference Method
A2-Other Particulate Sampling Train
A3-Liquid Absorption Technique
A4-Solid Absorption Technique
A5-Freezing Out Technique
A9-Other, Specify

C1-User calculated based on source test or other measurement
C2-User calculated based on material balance using engineering knowledge of the process
C3-User calculated based on AP-42
C4-User calculated by best guess/engineering Judgment

C5-User calculated based on a State or local agency emission factor
C6-New construction, not operational
C7-Source closed, operation ceased
C8-Computer calculated based on standard

FORM 2:

CRITERIA AIR POLLUTANTS
EMISSIONS CERTIFICATION REPORT

Calendar Year: 2018

Facility Name: GAMSE LITHOGRAPHING CO. Facility ID: AI #2143 Pollutant: CO

Equipment Description/ Registration No.	SCC Number	Fuel		Actual Emissions		Operating Schedule (Actual)				TOSD	Operating Schedule			Emissions Methods
				Tons/yr	Lbs/day	Hrs/dy	Dys/wk	Wk/yr	Days/yr	Lbs/dy	Hrs/dy	Start	End	
9-0159 **OUT OF SERVICE**		GAS	S	0.0	0.0									
CATOX			F											
			S											
			F											
			S											
			F											
			S											
			F											
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			S											
			F											
			S											
			F											
			S											
			F											
Total														

S - Stack Emissions F - Fugitive Emissions Daily emissions (lbs/day) are lbs/operating day of the source

TOSD: Typical Ozone Season Day means a typical day of that period of the year during which conditions for photochemical conditions are most favorable, which is generally during sustained periods of direct sunlight and warm temperatures (April-September). This section needs to be completed only for VOC and NOx sources.

Fuel: Include emissions for each fuel used. If more than one fuel is used, calculate and list emissions separately for each fuel.

Emission Estimation Method

A1-U.S. EPA Reference Method
A2-Other Particulate Sampling Train
A3-Liquid Absorption Technique
A4-Solid Absorption Technique
A5-Freezing Out Technique
A9-Other, Specify

C1-User calculated based on source test or other measurement
C2-User calculated based on material balance using engineering knowledge of the process
C3-User calculated based on AP-42
C4-User calculated by best guess/engineering Judgment

C5-User calculated based on a State or local agency emission factor
C6-New construction, not operational
C7-Source closed, operation ceased
C8-Computer calculated based on standard

1/09/08

FORM 2:

CRITERIA AIR POLLUTANTS
EMISSIONS CERTIFICATION REPORT

Calendar Year: 2018

Facility Name: GAMSE LITHOGRAPHING CO. Facility ID: AI #2143 Pollutant: PM

Equipment Description/ Registration No.	SCC Number	Fuel		Actual Emissions Tons/yr	Actual Emissions Lbs/day	Operating Schedule (Actual) Hrs/dy	Dys/wk	Wk/yr	Days/yr	TOSD Lbs/dy	Operating Schedule Hrs/dy	Start	End	Emissions Methods
9-0159 **OUT OF SERVICE**		GAS	S	0.0	0.0									
CATOX			F											
			S											
			F											
			S											
			F											
			S											
			F											
			S											
			F											
			S											
			F											
			S											
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			S											
			F											
			S											
			F											
			S											
			F											
Total														

S - Stack Emissions F - Fugitive Emissions Daily emissions (lbs/day) are lbs/operating day of the source

TOSD: Typical Ozone Season Day means a typical day of that period of the year during which conditions for photochemical conditions are most favorable, which is generally during sustained periods of direct sunlight and warm temperatures (April-September). This section needs to be completed only for VOC and NOx sources.

Fuel: Include emissions for each fuel used. If more than one fuel is used, calculate and list emissions separately for each fuel.

Emission Estimation Method

A1-U.S. EPA Reference Method
A2-Other Particulate Sampling Train
A3-Liquid Absorption Technique
A4-Solid Absorption Technique
A5-Freezing Out Technique
A9-Other, Specify

C1-User calculated based on source test or other measurement
C2-User calculated based on material balance using engineering knowledge of the process
C3-User calculated based on AP-42
C4-User calculated by best guess/engineering Judgment

C5-User calculated based on a State or local agency emission factor
C6-New construction, not operational
C7-Source closed, operation ceased
C8-Computer calculated based on standard

FORM 3: PM **EMISSIONS CERTIFICATION REPORT**

Particulate Matter

Calendar Year: 2018

Facility Name: GAMSE LITHOGRAPHING CO. **Facility ID:** 24-005-01149 **Pollutant:** PM

Equipment Description/ Registration No.	SCC Number	Fuel		PM – Filterable Tons/yr	PM – Filterable Lbs/day	PM 10 –Filterable Tons/yr	PM 10 –Filterable Lbs/day	PM 2.5 – Filterable Tons/yr	PM 2.5 – Filterable Lbs/day	PM Condensable Tons/yr	PM Condensable Lbs/day	Operation Days/yr	Emissions Methods
9-0159 **OUT OF ERVICE**			S	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0		
CATOX			F										
			S										
			F										
			S										
			F										
			S										
			F										
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			S										
			F										
			S										
			F										
			S										
			F										
Total													

S - Stack Emissions F - Fugitive Emissions Daily emissions (lbs/day) are lbs/operating day of the source Fuel: Include emissions for each fuel used. If more than one fuel is used, calculate and list emissions separately for each fuel.

Emission Estimation Method

A1-U.S. EPA Reference Method
A2-Other Particulate Sampling Train
A3-Liquid Absorption Technique
A4-Solid Absorption Technique
A5-Freezing Out Technique
A9-Other, Specify

C1-User calculated based on source test or other measurement
C2-User calculated based on material balance using engineering knowledge of the process
C3-User calculated based on AP-42
C4-User calculated by best guess/engineering Judgment

C5-User calculated based on a State or local agency emission factor
C6-New construction, not operational
C7-Source closed, operation ceased
C8-Computer calculated based on standard

2/21/08

FORM 4:

TOXIC AIR POLLUTANTS

Calendar Year: 2018

EMISSIONS CERTIFICATION REPORT

Facility Name: GAMSE LITHOGRAPHING CO. **Facility ID**: AI #2143 **Pollutant**: TAPS *

Equipment Description/ Registration Number[1]	Actual Emissions			Control Device*	% Efficiency
	Tons/yr	Lbs/day	Lbs/hr		
GRAVURE **OUT OF SERVICE**					
FLEXO	8.17	62.84	3.93		
LITHO	10.82	83.23	5.20		
	SEE TOX-A-MATIC TAP DEMONSTRATION				
TOTALS	18.99	146.07	9.13		

[1]Emissions must be broken down by equipment registration number (ex. 9-0076, 9-0077)

* Please attach all calculations.

* See Attachment 1 for the minimum reporting values.

**Control Device
S = Scrubber
B = Baghouse
ESP = Electrostatic Precipitator
A = Afterburner
C = Condenser
AD = Adsorbtion
O = Other

FORM 5:

BILLABLE TOXIC AIR POLLUTANTS

Calendar Year: 2018

Emissions Certification Report

Facility Name: GAM SE LITHOGRAPHING CO.

Facility ID#: **AI #2143**

Chemical Name	CAS Number		Actual Emissions				Estimation Method
			Tons/year	Lbs/day	Lbs/hr		
carbon disulfide	75-15-0	S	0	0	0		
		F	0	0	0		
carbonyl sulfide	463-58-1	S	0	0	0		
		F	0	0	0		
chlorine	7782-50-5	S	0	0	0		
		F	0	0	0		
cyanide compounds	57-12-5	S	0	0	0		
		F	0	0	0		
hydrochloric acid	7647-01-0	S	0	0	0		
		F	0	0	0		
hydrogen fluoride	7664-39-3	S	0	0	0		
		F	0	0	0		
methyl chloroform	71-55-6	S	0	0	0		
		F	0	0	0		
methylene chloride	75-09-2	S	0	0	0		
		F	0	0	0		
perchloroethylene	127-18-4	S	0	0	0		
		F	0	0	0		
phosphine	7803-51-2	S	0	0	0		
		F	0	0	0		
titanium tetrachloride	7550-45-0	S	0	0	0		
		F	0	0	0		
TOTALS			0	0	0		

S-Stack Emissions F-Fugitive Emissions Daily emissions (lbs/day) are lbs/operating day of the source

Emission Estimation Method

A1-U.S. EPA Reference Method
A2-Other Particulate Sampling Train
A3-Liquid Absorption Technique
A4-Solid Absorption Technique
A5-Freezing Out Technique
A9-Other, Specify

C1-User calculated based on source test or other measurement
C2-User calculated based on material balance using engineering knowledge of the process
C3-User calculated based on AP-42
C4-User calculated by engineering judgment
C5-User calculated based on a State or local agency factor
C6-New construction, not operational
C7-Source closed, operation ceased
C8-Computer calculated based on standards

This form is to include only the chemicals identified.

PLEASE NOTE: Be sure to attach all data and calculations necessary to support the emissions figures shown above.

FORM 6: Greenhouse Gases

GREENHOUSE GAS AIR POLLUTANTS

Calendar Year: 2018

EMISSIONS CERTIFICATION REPORT

Facility Name: GAMSE LITHOGRAPHING CO. **Facility ID**: AI #2143 **Pollutant**: CARBON DIOXIDE *

Equipment Description/ Registration Number[1]	Actual Emissions		
	Tons/yr	Lbs/day	Lbs/hr
9-0159 OUT OF SERVICE CATOX			
TOTALS			

[1]Emissions must be broken down by equipment registration number (ex. 9-0076, 9-0077)

This form must be used to report Greenhouse gas emissions:

- carbon dioxide (CO2)
- methane (CH4)
- nitrous oxide (N2O)
- hydrofluorocarbons (HFCs)
- perfluorocarbons (PFCs)
- sulfur hexafluoride (SF6)

* Use a separate form for each pollutant.

* Please attach all calculations.

FORM 6: Greenhouse Gases

GREENHOUSE GAS AIR POLLUTANTS

Calendar Year: 2018

EMISSIONS CERTIFICATION REPORT

Facility Name: GAMSE LITHOGRAPHING CO. **Facility ID**: AI #2143 **Pollutant**: HYDROFLUROCARBONS*

Equipment Description/ Registration Number[1]	Actual Emissions		
	Tons/yr	Lbs/day	Lbs/hr
9-0159 CATOX	0.000	0.000	0.000
TOTALS	0.000	0.000	0.000

This form must be used to report Greenhouse gas emissions:

- carbon dioxide (CO2)
- methane (CH4)
- nitrous oxide (N2O)
- hydrofluorocarbons (HFCs)
- perfluorocarbons (PFCs)
- sulfur hexafluoride (SF6)

* Use a separate form for each pollutant.

* Please attach all calculations.

[1]Emissions must be broken down by equipment registration number (ex. 9-0076, 9-0077)

FORM 6: Greenhouse Gases

GREENHOUSE GAS AIR POLLUTANTS

Calendar Year: 2018

EMISSIONS CERTIFICATION REPORT

Facility Name: GAMSE LITHOGRAPHING CO. **Facility ID**: AI #2143 **Pollutant**: METHANE *

Equipment Description/ Registration Number[1]	Actual Emissions		
	Tons/yr	Lbs/day	Lbs/hr
9-0159 **OUT OF SERVICE** CATOX	0.000	0.000	0.000
TOTALS			

[1]Emissions must be broken down by equipment registration number (ex. 9-0076, 9-0077)

This form must be used to report Greenhouse gas emissions:

- carbon dioxide (CO2)
- methane (CH4)
- nitrous oxide (N2O)
- hydrofluorocarbons (HFCs)
- perfluorocarbons (PFCs)
- sulfur hexafluoride (SF6)

* Use a separate form for each pollutant.

* Please attach all calculations.

FORM 6: Greenhouse Gases

GREENHOUSE GAS AIR POLLUTANTS

Calendar Year: 2018

EMISSIONS CERTIFICATION REPORT

Facility Name: GAMSE LITHOGRAPHING CO. **Facility ID**: AI #2143 **Pollutant**: NITROUS OXIDE *

Equipment Description/ Registration Number[1]	Actual Emissions		
	Tons/yr	Lbs/day	Lbs/hr
9-0159 OUT OF SERVICE CATOX	0.000	0.000	0.0000
TOTALS			

[1]Emissions must be broken down by equipment registration number (ex. 9-0076, 9-0077)

This form must be used to report Greenhouse gas emissions:

- carbon dioxide (CO2)
- methane (CH4)
- nitrous oxide (N2O)
- hydrofluorocarbons (HFCs)
- perfluorocarbons (PFCs)
- sulfur hexafluoride (SF6)

* Use a separate form for each pollutant.

* Please attach all calculations.

FORM 6: Greenhouse Gases

GREENHOUSE GAS AIR POLLUTANTS

Calendar Year: 2018

EMISSIONS CERTIFICATION REPORT

Facility Name: GAMSE LITHOGRAPHING CO. **Facility ID**: AI #2143 **Pollutant**: PERFLUROCARBONS*

Equipment Description/ Registration Number[1]	Actual Emissions		
	Tons/yr	Lbs/day	Lbs/hr
9-0159 OUT OF SERVICE CATOX	0.000	0.000	0.000
TOTALS			

This form must be used to report Greenhouse gas emissions:

- carbon dioxide (CO2)
- methane (CH4)
- nitrous oxide (N2O)
- hydrofluorocarbons (HFCs)
- perfluorocarbons (PFCs)
- sulfur hexafluoride (SF6)

* Use a separate form for each pollutant.

* Please attach all calculations.

[1]Emissions must be broken down by equipment registration number (ex. 9-0076, 9-0077)

FORM 6: Greenhouse Gases

GREENHOUSE GAS AIR POLLUTANTS

Calendar Year: 2018

EMISSIONS CERTIFICATION REPORT

Facility Name: GAMSE LITHOGRAPHING CO. **Facility ID**: AI #2143 **Pollutant**: SULFURHEXAFLUORIDE *

Equipment Description/ Registration Number[1]	Actual Emissions		
	Tons/yr	Lbs/day	Lbs/hr
9-0159 OUT OF SERVICE CATOX	0.000	0.000	0.000
TOTALS			

[1]Emissions must be broken down by equipment registration number (ex. 9-0076, 9-0077)

This form must be used to report Greenhouse gas emissions:

- carbon dioxide (CO2)
- methane (CH4)
- nitrous oxide (N2O)
- hydrofluorocarbons (HFCs)
- perfluorocarbons (PFCs)
- sulfur hexafluoride (SF6)

* Use a separate form for each pollutant.

* Please attach all calculations.

2018 EMISSIONS CERTIFICATION REPORT

CALCULATIONS SPREADSHEET & SCREEN3

GAMSE LITHOGRAPHING CO. - 2018 ECR WORKSHEET

LITHOGRAPHIC PRESSES:

21640.37 LBS/YR
260 DAYS/YR

PRESS ID	REG. NO.	TOTAL HOURS	%	LBS/YR	LBS/DAY	TPY
40	6-1983	4991	26.02%	5630.65	21.66	2.82
41	6-2634	5301	27.64%	5980.38	23.00	2.99
42	6-2156	5539	28.88%	6248.88	24.03	3.12
43	6-2376	770	4.01%	868.68	3.34	0.43
44	6-2377	2581	13.46%	2911.78	11.20	1.46
46	6-2818	0	0.00%	0.00	0.00	0.00
		19182	**100.00%**	21640.37	**83.23**	**10.82**

GRAVURE PRESS (OUT OF SERVICE IN 2018)

0 LBS/YR
0 DAYS/YR

PRESS ID	REG. NO.	TOTAL HOURS	%	LBS/YR	LBS/DAY	TPY
47	6-1983	0	0.00%	0.00	0.00	0.00
		0	**0.00%**	**0.00**	**0.00**	**0.00**

FLEXOGRAPHIC PRESSES:

16339.63 LBS/YR
260 DAYS/YR

PRESS ID	REG. NO.	TOTAL HOURS	%	LBS/YR	LBS/DAY	TPY
66	6-2825	4507	25.02%	4088.54	15.73	2.04
68	6-2936	2375	13.19%	2154.49	8.29	1.08
69	6-3017	5601	31.10%	5080.96	19.54	2.54
70	6-3123	5529	30.70%	5015.65	19.29	2.51
		18012	100.00%	16339.63	**62.84**	**8.17**

EMISSION FACTORS: GRAVURE PRESS IS OUT OF SERVICE IN 2018 ; LITHO PRESSES - VOC RELEASE FACTOR 0.05 (PNEAC DETERMINIG VOC/HAP EMISSIONS FROM SHEETFED OFFSET LITHOGRAPHIC PRINTING OPERATIONS); CLEANUP SOLVENTS - 50% RETAINED IN RAGS

INPUT DATA

Tox-A-Matic 2012

HAP/TAP Demonstration

GAMSE LITHO	
Jenkins Environmental	
March 21, 2019	
16	Typical hours of emissions per 8-hour work day
5	Typical days per week of emissions
52	Typical weeks per year of emissions
yes	Building downwash (default is yes)
	Screen3 or AERSCREEN model run maximum concentration (ug/m3) from a 1 lb/hr emission rate
0.7	8-hour multiplier (default is 0.7)
0.08	Annual multiplier (default is 0.08)
0	Total hazardous waste (pounds per year)

VOC & Material Usage

18.99 VOC (ton / year)

146.10 VOC (pounds / day)

55222.00 Gallons / year

Coating	Weight per gallon of coating (pounds)	Quantity used per year (gallons)	Haz Waste (pounds)	VOC Percentage (3.2 = 3.2%)	VOC Pounds per gallon (3.2=3.2 lbs)	CAS #	Percentage by weight of the CAS # (12 = 12%)	Control Multiplier	TAP Name (CAS # name)	TAP (lb/yr)		VOC (lb/yr)	
GRAVURE PRESS OUT OF SERVICE													
1226699 GRAV C LINE POCESS BLACK	8.21	0.0	0		5.38	141786	28	0.168	ETHYL ACETATE	0	0	0	440707.34
						64175	20		ETHANOL	0		0	
						109604	10		N-PROPYL ACETATE	0		0	
						67630	3		ISOPROPYL ALCOHOL	0		0	
1011293 GRAV EXTENDER	8.21	0.0	0		6.81	108214	55	0.168	ISOPROPYL ACETATE	0	0	0	
						9004700	20		PYROXYLIN, PLASTIC SCRAP	0			
						67630	8		ISOPROPYL ALCOHOL	0		0	
1387355 GRAV TAN/PURPLE	7.85	0.0	0		4.87	64175	45	0.168	ETHANOL	0	0	0	
						109604	20		N-PROPYL ACETATE	0		0	
						67630	8		ISOPROPYL ALCOHOL	0		0	
						71238	8		PROPANOL	0		0	
1337771 GRAV LEA & PERRINS	7.72	0.0	0		4.89	64175	45	0.168	ETHANOL	0	0	0	
						109604	28		N-PROPYL ACETATE	0		0	
						67630	8		ISOPROPYL ALCOHOL	0		0	
1213304 GRAV C LEA & PERRINS	7.75	0.0	0		4.89	108214	45	0.168	ISOPROPYL ACETATE	0			
						109604	22		N-PROPYL ACETATE	0		0	
						9004700	8		PYROXYLIN, PLASTIC SCRAP	0		0	
						67630	3		ISOPROPYL ALCOHOL	0			
1513347 GRAV C CRAYOLA	8.21	0.0	0		4.88	64175	43	0.168	ETHANOL	0	0	0	
						109604	15		N-PROPYL ACETATE	0		0	
						67630	6		ISOPROPYL ALCOHOL	0		0	
1320844 GRAV LEA & PERRINS	7.97	0.0	0		5.23	64175	28	0.168	ETHANOL	0	0	0	
						71238	28		PROPANOL	0		0	
						109604	20		N-PROPYL ACETATE	0		0	
CLEANING FLUIDS - GENERAL			0			67630	5		ISOPROPYL ALCOHOL	0		0	
ETHYL ACETATE	7.52	327.0	0		7.53	141786	100	0.5	ETHYL ACETATE	1229.52	1231.155	2459.04	
N-PROPYL ACETATE	7.39	300.0	0		7.39	109604	100	0.5	N-PROPYL ACETATE	1108.5	1108.5	2217	
ISOPROPYL ACETATE	7.28	111.0	0		7.28	108214	100	0.5	ISOPROPYL ACETATE	404.04	404.04	808.08	

ISOPROPYL ALCOHOL	6.58	647.0	0		6.58	67630	100	0.5	ISOPROPYL ALCOHOL	2128.63	2128.63	4257.26
												0
FLEXO PRESSES												
EIC, INX, INTERACTIVE AQUAEOUS INKS	8.50	8420.0	0		1.1	1336216	1.1	1	AMMONIUM HYDROXIDE	787.27	9262	
						57556	2.3		PROPYLENE GLYCOL	1646.11		
						108010	0.66		DIMETHYLAMINOETHANOL	472.362		
						67630	0.2		ISOPROPYL ALCOHOL	143.14		
EIC PH ADJUSTER	9.00	4.0	0	8		64175	7.3	1	ETHANOL	2.628	2.88	36
						1336216	35		AMMONIUM HYDROXIDE	12.6		0
EIC OPV OVER PRINT	9.00	94.0	0		0	119619	5	0.05	BENZOPHENONE	2.115		846
						15625895	21		TRIMETHYLOLPROPANE TRIACRYLATE	8.883		0
						105599	6		METHYLDIETHANOLAMINE	2.538		0
EIC PRINT CLEAN ADDITIVES	8.21	20.0	0	100		108010	100	1	DIMETHYLAMINOETHANOL	164.2	164.2	164.2
INTERACTIVE PH ADJUSTER	8.68	2044.0	0		2.27	1336216	10	1	AMMONIUM HYDROXIDE	1774.192	4639.88	17741.92
						67630	10		ISOPROPYL ALCOHOL	1774.192		0
						108010	3		DIMETHYLAMINOETHANOL	532.2576		0
MINUS 9 LA5994LO	9.00	224.0	0	0		57472681	30	0.05		30.24		2016
						15625895	30		TRIMETHYLOLPROPANE TRIACRYLATE	30.24		0
1313626 ROTOFLEX BLUE	7.83	0.0	0		4.83	64175	45	1	ETHANOL	0	0	0
						109604	20		N-PROPYL ACETATE	0		0
						71238	10		PROPANOL	0		0
						67630	8		ISOPROPYL ALCOHOL	0		
SUN INK EYE MARK BLACK	7.97	0.0	0	58		71238	33	1	PROPANOL	0	0	0
						64175	8		ETHANOL	0		0
						108214	8		ISOPROPYL ACETATE	0		0
						109604	8		N-PROPYL ACETATE	0		0
						9004700	8		PYROXYLIN, PLASTIC SCRAP	0		0
						67630	3		ISOPROPYL ALCOHOL	0		0
						64742898	2		Lig.aliphatic Solv.naphtha	0		0
						14038438	2			0		0
						128370	3		2,6-DITERT-BUTYL-P-CRESOL	3.024		0
AUTOCLEAN 140	6.67	0.0	0	96		64742945	10	1	Aromatic Hydrocarbon	62.698	0	626.98
						64742887	80		Med. Aliphatic Solvent Naphtha	501.584		0
						112345	5		ETHANOL, 2-(2-BUTOXYETHOXY)-	31.349		0
						9016459	3		TERGITOL NP-33 (nonionic)	18.8094		
PROPYLENE GLYCOL	8.80	37.0	0	100		57556	55	1	PROPYLENE GLYCOL	179.08	325.6	325.6
						34590948	45		DIPROPYLENE GLYCOL METHYL ETHER	146.52		0
FLEXOWASH AQUA CLEAN	8.67	2.0	0	0.001		141435	6	1	ETHANOLAMINE	1.0404	0.000173	17.34
						111762	6		2-BUTOXYETHANOL (EGBE)	1.0404		0
												0
LITHO PRESSES												
1264032 AC114PG COATING	8.38	23155	0		0.65	1336216	5	1	AMMONIUM HYDROXIDE	9701.945	15050.75	194038.9
						57556	5		PROPYLENE GLYCOL	9701.945		0
						577117	3			5821.167		0
1370818 OSF PANTONE BLUE (REP INK)	8.84	3396	0		1.03	64742536	6	0.05	Petroleum Distillate-Hydrotreated Light	90.06192	174.894	30020.64
						64742547	3		Petroleum Lub. Oil	45.03096		0
						64742467	1.3		Maggie Oil (mist)	19.513416		0
						64197	0.6		ACETIC ACID	9.006192		0
						8052413	0.3		STODDARD SOLVENT	4.503096		0
						111762	0.17		2-BUTOXYETHANOL (EGBE)	2.5517544		0
1137716 OSF PANTONE COLORS	12.21	135	0		2.39	64742967	11.6	0.05		9.56043	16.1325	1648.35
						64741919	8			6.5934		0
1515813 OSF PROCESS COLORS	8.98	3515	0		0.56	64742536	5.44	0.05	Petroleum Distillate-Hydrotreated Light	85.855984	98.42	31564.7
						8052413	0.441		STODDARD SOLVENT	6.96001635		0
						111762	0.1675		2-BUTOXYETHANOL (EGBE)	2.643543625		0
1190519 HWO BLACK NEWS	8.35	777	0		2.29	64742536	22.42	0.05	Petroleum Distillate-Hydrotreated Light	72.7299195	88.9665	6487.95
						64742547	7		Petroleum Lub. Oil	22.707825		0
						64742467	3		Maggie Oil (mist)	9.731925		0
						8042475	0.47		Oil Mist, mineral	1.52466825		0

						64742536	0.45		Petroleum Distillate-Hydrotreated Light	1.45978875			0
1248696 GLOSS OPV	7.79	126	0		3.11	64742536	28	0.05	Petroleum Distillate-Hydrotreated Light	13.74156	19.593		981.54
						8042475	28		Oil Mist, mineral	13.74156			0
						68474577	5			2.45385			0
						64741862	1		Hydrotreated Petroleum Oil	0.49077			0
1394484 UV OSF VINYL WHITE	14	520	0		0.84	100414	0.2	0.05	ETHYL BENZENE	0.728	21.84		7280
1299642 OSF PROCESS YELLOW	8.26	0	0		1.22	64742467	8	0.05	Maggie Oil (mist)	17.1808	0		4295.2
						8042475	8		Oil Mist, mineral	17.1808			0
						64742536	4		Petroleum Distillate-Hydrotreated Light	8.5904			0
						64742467	3		Maggie Oil (mist)	6.4428			0
						123319	0.15		HYDROQUINONE	0.32214			0
1078539 0SF MAROON	9.24	640	0		0.3	5160021	18	0.05	BENZENESULFONIC ACID, 5-CHLORO-2-((2-HYDROXY-1	53.2224	9.6		5913.6
						1333864	4		CARBON BLACK	11.8272			0
						8050097	4		colophony (Rosin core solder thermal decomp)	11.8272			0
						64742536	2		Petroleum Distillate-Hydrotreated Light	5.9136			0
						1332587	2		KAOLIN	5.9136			0
						68188147	2			5.9136			0
1074861 OSF PANTONE 186 RED	9.42	5	0		0.32	8050097	4	0.05	colophony (Rosin core solder thermal decomp)	0.0942	0.08		47.1
						64742536	2		Petroleum Distillate-Hydrotreated Light	0.0471			0
						68188147	2			0.0471			0
						136527	0.6			0.01413			0
						108316	0.6		MALEIC ANHYDRIDE	0.01413			0
CORK 36SBS & 3195HR	8.59	0	0		0.13	57556	3	1	PROPYLENE GLYCOL	1.2885	0		42.95
						1336216	2		AMMONIUM HYDROXIDE	0.859			0
CORK CK-4315UF	8.59	535	0		0.1	57556	3	1	PROPYLENE GLYCOL	137.8695	53.5		4595.65
						1336216	2		AMMONIUM HYDROXIDE	91.913			0
CORK CU-2014 HG49	9.17	0	0		0	15625895	35	0.05	TRIMETHYLOLPROPANE TRIACRYLATE	85.854125			4905.95
						42978665	10		Tripropylene Glycol Diacrylate	24.52975			0
						55818570	15			36.794625			0
CORK CK-608LWTP	8.59	56	0		0.1	57556	3	1	PROPYLENE GLYCOL	14.4312	5.6		481.04
						1336216	2		AMMONIUM HYDROXIDE	9.6208			0
STARKOTE AQ-222	8.34	1014	0		0.25	1336216	2	1	AMMONIUM HYDROXIDE	169.1352	253.5		8456.76
						67630	3		ISOPROPYL ALCOHOL	253.7028			0
STARKOTE AQ-117	8.67	0	0		0.1	1336216	2	1	AMMONIUM HYDROXIDE	175.8276	0		8791.38
1324 MC-55	8.34	1899	0		0.299	766417	1	1		158.3766	567.801		15837.66
						67630	3.4		ISOPROPYL ALCOHOL	538.48044			0
1423D	8.34	0	0		0.136	1336216	3.09	1	AMMONIUM HYDROXIDE	489.383694	0		15837.66
FOUNTAIN CONC 162-50	8.34	132	0		3.48	111762	2.5	1	2-BUTOXYETHANOL (EGBE)	27.522	459.36		1100.88
						112072	2.5		ETHYLENE GLYCOL MONOBUTYL ETHER ACETATE	27.522			0
						6484522	2.5		AMMONIUM NITRATE WITH ORGANIC COATING	27.522			0
FEDEROID	6.84	298	0		3.71	67641	45	0.5	ACETONE	458.622	552.79		2038.32
						108883	35		TOLUENE	356.706			0
						1330207	15		XYLENE	152.874			0
						64742898	6		Lig.aliphatic Solv.naphtha	61.1496			0
AUTOWASH 7800	6.76	260	0		6.76	64742489	55	0.5	Naphthol Spirits (for Paints Only)	483.34	878.8		1757.6
						64742956	25		Naphtha	219.7			0
						95636	15		PSEUDOCUMENE	131.82			0
						1330207	2.5		XYLENE	21.97			0
						98828	2.5		CUMENE	21.97			0
WEBFONT 225N	8.92	0	0		0.98	107211	3.97	1	ETHYLENE GLYCOL	92.07224	0		2319.2
						111762	1.5		2-BUTOXYETHANOL (EGBE)	34.788			0
MINUS 9 UV6772	9.00	6400	0	0		15625895	30	0.05	TRIMETHYLOLPROPANE TRIACRYLATE	864			57600
						42978665	15		Tripropylene Glycol Diacrylate	432			0
PRISCO E-CURE	7.23	129	0		7.23	64742887	55	0.5	Med. Aliphatic Solvent Naphtha	256.48425	466.335		932.67
						34590948	45		DIPROPYLENE GLYCOL METHYL ETHER	209.85075			0
CORK 3107	8.59	0	0	60		57556	3	1	PROPYLENE GLYCOL	33.2433	0		1108.11
						1336216	2		AMMONIUM HYDROXIDE	22.1622			0
CORK 72 40	8.59	0	0	60		57556	3	1	PROPYLENE GLYCOL	33.2433	0		1108.11
						1336216	2		AMMONIUM HYDROXIDE	22.1622		18717.96	0

TAP EMISSIONS QUANTIFICATION

Tox-A-Matic 2012
GAMSE LITHO
enkins Environmental
March 21, 2019

HAP 10/25
0.18 Highest individual (ton / year)
0.35 Total (ton / year)

16	Typical hours of emissions per 8-hour work day
5	Typical days per week of emissions
52	Typical weeks per year of emissions
yes	Building downwash (default is yes)
0	Screen3 or AERSCREEN model run maximum concentration (ug/m3) from a 1 lb/hr emission rate
0.7	8-hour multiplier (default is 0.7)
0.08	Annual multiplier (default is 0.08)

Sum of TAP (lb/yr)	
CAS #	Total

lb/yr		TAP Name	Emissions Uncontrolled lb/yr	Emissions Uncontrolled lb/hr	Control Multiplier	Controlled lb/yr	Controlled lb/hr	Screening Levels 1-hour ug/m3	Screening Levels 8-hour ug/m3	Screening Levels Annual ug/m3	Exempt	HAP QTY lb/yr	Bomb 1-hour	Bomb 8-hour	Bomb Annual
											26.11.15.01B(5)				
108883	356.706	TOLUENE	356.706	0.0857466	1	356.706	0.0857466		753.61963			356.71			
8052413	11.46311235	STODDARD SOLVENT	11.463112	0.0027556	1	11.463112	0.0027556		5725.9714						
1330207	174.844	XYLENE	174.844	0.0420298	1	174.844	0.0420298	6512.8834	4341.9223			174.84			
64742489	483.34	Naphthol Spirits (for Paints Only)	483.34	0.1161875	1	483.34	0.1161875								
64742956	219.7	Naphtha	219.7	0.0528125	1	219.7	0.0528125								
9016459	18.8094	TERGITOL NP-33 (nonionic)	18.8094	0.0045215	1	18.8094	0.0045215		150.47						
95636	131.82	PSEUDOCUMENE	131.82	0.0316875	1	131.82	0.0316875		1800						
98828	21.97	CUMENE	21.97	0.0052813	1	21.97	0.0052813		2457.8732			21.97			
100414	0.728	ETHYL BENZENE	0.728	0.000175	1	0.728	0.000175		868.38446			0.73			
67641	458.622	ACETONE	458.622	0.1102457	1	458.622	0.1102457	17806.748	11871.166						
67630	4838.14524	ISOPROPYL ALCOHOL	4838.1452	1.1630157	1	4838.1452	1.1630157	9830.6748	4915.3374						
128370	3.024	2,6-DITERT-BUTYL-P-CRESOL	3.024	0.0007269	1	3.024	0.0007269		20						
1336216	13257.07069	AMMONIUM HYDROXIDE	13257.071	3.1867958	1	13257.071	3.1867958	501.73824	358.38446				M		M
111762	68.54569803	2-BUTOXYETHANOL (EGBE)	68.545698	0.0164773	1	68.545698	0.0164773		966.62577						
107211	92.07224	ETHYLENE GLYCOL	92.07224	0.0221328	1	92.07224	0.0221328	1000	77			92.07			
8042475	32.44702825	Oil Mist, mineral	32.447028	0.0077998	1	32.447028	0.0077998								
141786	1229.52	ETHYL ACETATE	1229.52	0.2955577	1	1229.52	0.2955577		14413.088						
64175	2.628	ETHANOL	2.628	0.0006317	1	2.628	0.0006317	18842.536	3768.5072						
109604	1108.5	N-PROPYL ACETATE	1108.5	0.2664663	1	1108.5	0.2664663	10442.74	8354.1922						
108214	404.04	ISOPROPYL ACETATE	404.04	0.097125	1	404.04	0.097125	8354.1922	4177.0961						
9004700	0	PYROXYLIN, PLASTIC SCRAP	0	0	1	0	0		70						M
71238	0	PROPANOL	0	0	1	0	0		2457.6687						M
57556	11747.2108	PROPYLENE GLYCOL	11747.211	2.8238488	1	11747.211	2.8238488		308						M
108010	1168.8196	DIMETHYLAMINOETHANOL	1168.8196	0.2809663	1	1168.8196	0.2809663		325						
119619	2.115	BENZOPHENONE	2.115	0.0005084	1	2.115	0.0005084		40.53			2.12			
15625895	988.977125	TRIMETHYLOLPROPANE TRIACRYLATE	988.97713	0.2377349	1	988.97713	0.2377349								
105599	2.538	METHYLDIETHANOLAMINE	2.538	0.0006101	1	2.538	0.0006101		79.745						
141435	1.0404	ETHANOLAMINE	1.0404	0.0002501	1	1.0404	0.0002501	150	80						
577117	5821.167		5821.167	1.399319	1	5821.167	1.399319								

64742536	278.4002723	Petroleum Distillate-Hydrotreated Ligh	278.40027	0.0669231	1	278.40027	0.0669231					
64742547	67.738785	Petroleum Lub. Oil	67.738785	0.0162834	1	67.738785	0.0162834		615			
64742467	52.868941	Maggie Oil (mist)	52.868941	0.0127089	1	52.868941	0.0127089	100	50			
64197	9.006192	ACETIC ACID	9.006192	0.002165	1	9.006192	0.002165	368.09816	245.39877			
64742967	9.56043		9.56043	0.0022982	1	9.56043	0.0022982					
64741919	6.5934		6.5934	0.001585	1	6.5934	0.001585					
68474577	2.45385		2.45385	0.0005899	1	2.45385	0.0005899					
64741862	0.49077	Hydrotreated Petroleum Oil	0.49077	0.000118	1	0.49077	0.000118	100	50			
42978665	456.52975	Tripropylene Glycol Diacrylate	456.52975	0.1097427	1	456.52975	0.1097427		278.8			
55818570	36.794625		36.794625	0.0088449	1	36.794625	0.0088449					
64742945	62.698	Aromatic Hydrocarbon	62.698	0.0150716	1	62.698	0.0150716					
64742887	758.06825	Med. Aliphatic Solvent Naphtha	758.06825	0.1822279	1	758.06825	0.1822279					
112345	31.349	ETHANOL, 2-(2-BUTOXYETHOXY)-	31.349	0.0075358	1	31.349	0.0075358		33.6			31.35
766417	158.3766		158.3766	0.0380713	1	158.3766	0.0380713					
112072	27.522	ETHYLENE GLYCOL MONOBUTYL ETHEI	27.522	0.0066159	1	27.522	0.0066159		1310.4294			27.52
6484522	27.522	AMMONIUM NITRATE WITH ORGANIC	27.522	0.0066159	1	27.522	0.0066159		90.897	Exempt		
64742898	61.1496	Lig.aliphatic Solv.naphtha	61.1496	0.0146994	1	61.1496	0.0146994					
123319	0.32214	HYDROQUINONE	0.32214	7.744E-05	1	0.32214	7.744E-05		10			0.32
5160021	53.2224	BENZENESULFONIC ACID, 5-CHLORO-2-	53.2224	0.0127938	1	53.2224	0.0127938		5			
1333864	11.8272	CARBON BLACK	11.8272	0.0028431	1	11.8272	0.0028431		30			
8050097	11.9214	colophony (Rosin core solder thermal (	11.9214	0.0028657	1	11.9214	0.0028657					
1332587	5.9136	KAOLIN	5.9136	0.0014215	1	5.9136	0.0014215		20			
68188147	5.9607		5.9607	0.0014329	1	5.9607	0.0014329					
136527	0.01413		0.01413	3.397E-06	1	0.01413	3.397E-06					
108316	0.01413	MALEIC ANHYDRIDE	0.01413	3.397E-06	1	0.01413	3.397E-06		0.1			0.01
57472681	30.24		30.24	0.0072692	1	30.24	0.0072692					
14038438	0		0	0	1	0	0					
34590948	356.37075	DIPROPYLENE GLYCOL METHYL ETHER	356.37075	0.085666	1	356.37075	0.085666	9092.0245	12122.699			

8-HOUR SCREENING ANALYSIS

Tox-A-Matic 2012
GAMSE LITHO
Jenkins Environmental
March 21, 2019

16	Typical hours of emissions per 8-hour work day
5	Typical days per week of emissions
52	Typical weeks per year of emissions
yes	Building downwash (default is yes)
0	Screen3 or AERSCREEN model run maximum concentration (ug/m3) from a 1 lb/hr emission rate
0.7	8-hour multiplier (default is 0.7)

CAS	Name	Emissions Controlled lb/hr	Screening Level ug/m3	Exempt	Small Emitter 1	AER	Screen 3 or AERSCREEN Impact ug/m3	Small Emitter 2	% screen Level	Pass?	Bomb
				26.11.15.01B(5)	26.11.15.03B(3)	26.11.16.02A(4)		26.11.15.03B(4)			
108883	TOLUENE	0.0857466	753.61963		pass	pass					
8052413	STODDARD SOLVENT	0.0027556	5725.9714		pass	pass					
1330207	XYLENE	0.0420298	4341.9223		pass	pass					
64742489	Naphthol Spirits (for Paints Only)	0.1161875									
64742956	Naphtha	0.0528125									
9016459	TERGITOL NP-33 (nonionic)	0.0045215	150.47			pass					
95636	PSEUDOCUMENE	0.0316875	1800		pass	pass					
98828	CUMENE	0.0052813	2457.8732		pass	pass					
100414	ETHYL BENZENE	0.000175	868.38446		pass	pass					
67641	ACETONE	0.1102457	11871.166		pass	pass					
67630	ISOPROPYL ALCOHOL	1.1630157	4915.3374			pass					
128370	2,6-DITERT-BUTYL-P-CRESOL	0.0007269	20			pass					
1336216	AMMONIUM HYDROXIDE	3.1867958	358.38446								M
111762	2-BUTOXYETHANOL (EGBE)	0.0164773	966.62577		pass	pass					
107211	ETHYLENE GLYCOL	0.0221328	77			pass					
8042475	Oil Mist, mineral	0.0077998									
141786	ETHYL ACETATE	0.2955577	14413.088		pass	pass					
64175	ETHANOL	0.0006317	3768.5072		pass	pass					
109604	N-PROPYL ACETATE	0.2664663	8354.1922		pass	pass					
108214	ISOPROPYL ACETATE	0.097125	4177.0961		pass	pass					
9004700	PYROXYLIN, PLASTIC SCRAP		70								M
71238	PROPANOL		2457.6687								M
57556	PROPYLENE GLYCOL	2.8238488	308								M
108010	DIMETHYLAMINOETHANOL	0.2809663	325		pass	pass					
119619	BENZOPHENONE	0.0005084	40.53			pass					
15625895	TRIMETHYLOLPROPANE TRIACRYLATE	0.2377349									
105599	METHYLDIETHANOLAMINE	0.0006101	79.745			pass					
141435	ETHANOLAMINE	0.0002501	80			pass					
577117		1.399319									
64742536	Petroleum Distillate-Hydrotreated Ligh	0.0669231									
64742547	Petroleum Lub. Oil	0.0162834	615		pass	pass					
64742467	Maggie Oil (mist)	0.0127089	50			pass					
64197	ACETIC ACID	0.002165	245.39877		pass	pass					
64742967		0.0022982									
64741919		0.001585									
68474577		0.0005899									
64741862	Hydrotreated Petroleum Oil	0.000118	50			pass					
42978665	Tripropylene Glycol Diacrylate	0.1097427	278.8		pass	pass					
55818570		0.0088449									
64742945	Aromatic Hydrocarbon	0.0150716									
64742887	Med. Aliphatic Solvent Naphtha	0.1822279									
112345	ETHANOL, 2-(2-BUTOXYETHOXY)-	0.0075358	33.6			pass					
766417		0.0380713									
112072	ETHYLENE GLYCOL MONOBUTYL ETHE	0.0066159	1310.4294		pass	pass					
6484522	AMMONIUM NITRATE WITH ORGANIC	0.0066159	90.897	pass		pass					
64742898	Lig.aliphatic Solv.naphtha	0.0146994									
123319	HYDROQUINONE	7.744E-05	10			pass					
5160021	BENZENESULFONIC ACID, 5-CHLORO-2	0.0127938	5			pass					
1333864	CARBON BLACK	0.0028431	30			pass					
8050097	colophony (Rosin core solder thermal	0.0028657									
1332587	KAOLIN	0.0014215	20			pass					
68188147		0.0014329									
136527		3.397E-06									
108316	MALEIC ANHYDRIDE	3.397E-06	0.1			pass					
57472681		0.0072692									
14038438											
34590948	DIPROPYLENE GLYCOL METHYL ETHER	0.085666	12122.699		pass	pass					

1-HOUR SCREENING ANALYSIS

Tox-A-Matic 2012
GAMSE LITHO
Jenkins Environmental
March 21, 2019

16	Typical hours of emissions per 8-hour work day
5	Typical days per week of emissions
52	Typical weeks per year of emissions
yes	Building downwash (default is yes)
0	Screen3 or AERSCREEN model run maximum concentration (ug/m3) from a 1 lb/hr emission rate

CAS	Name	Emissions Controlled lb/hr	Screening Level ug/m3	Exempt	Small Emitter 1	AER	Screen 3 or AERSCREEN Impact ug/m3	Small Emitter 2	% screen Level	Pass?	Bomb
				26.11.15.01B(5)	26.11.15.03B(3)	26.11.16.02A(4)		26.11.15.03B(4)			
108883	TOLUENE	0.0857466									
8052413	STODDARD SOLVENT	0.0027556									
1330207	XYLENE	0.0420298	6512.8834		pass	pass					
64742489	Naphthol Spirits (for Paints Only)	0.1161875									
64742956	Naphtha	0.0528125									
9016459	TERGITOL NP-33 (nonionic)	0.0045215									
95636	PSEUDOCUMENE	0.0316875									
98828	CUMENE	0.0052813									
100414	ETHYL BENZENE	0.000175									
67641	ACETONE	0.1102457	17806.748		pass	pass					
67630	ISOPROPYL ALCOHOL	1.1630157	9830.6748			pass					
128370	2,6-DITERT-BUTYL-P-CRESOL	0.0007269									
1336216	AMMONIUM HYDROXIDE	3.1867958	501.73824								M
111762	2-BUTOXYETHANOL (EGBE)	0.0164773									
107211	ETHYLENE GLYCOL	0.0221328	1000			pass					
8042475	Oil Mist, mineral	0.0077998									
141786	ETHYL ACETATE	0.2955577									
64175	ETHANOL	0.0006317	18842.536		pass	pass					
109604	N-PROPYL ACETATE	0.2664663	10442.74		pass	pass					
108214	ISOPROPYL ACETATE	0.097125	8354.1922		pass	pass					
9004700	PYROXYLIN, PLASTIC SCRAP										
71238	PROPANOL										
57556	PROPYLENE GLYCOL	2.8238488									
108010	DIMETHYLAMINOETHANOL	0.2809663									
119619	BENZOPHENONE	0.0005084									
15625895	TRIMETHYLOLPROPANE TRIACRYLATE	0.2377349									
105599	METHYLDIETHANOLAMINE	0.0006101									
141435	ETHANOLAMINE	0.0002501	150			pass					
577117		1.399319									
64742536	Petroleum Distillate-Hydrotreated Ligh	0.0669231									
64742547	Petroleum Lub. Oil	0.0162834									
64742467	Maggie Oil (mist)	0.0127089	100			pass					
64197	ACETIC ACID	0.002165	368.09816		pass	pass					
64742967		0.0022982									
64741919		0.001585									
68474577		0.0005899									
64741862	Hydrotreated Petroleum Oil	0.000118	100			pass					
42978665	Tripropylene Glycol Diacrylate	0.1097427									
55818570		0.0088449									
64742945	Aromatic Hydrocarbon	0.0150716									
64742887	Med. Aliphatic Solvent Naphtha	0.1822279									
112345	ETHANOL, 2-(2-BUTOXYETHOXY)-	0.0075358									
766417		0.0380713									
112072	ETHYLENE GLYCOL MONOBUTYL ETHE	0.0066159									
6484522	AMMONIUM NITRATE WITH ORGANIC	0.0066159		pass							
64742898	Lig.aliphatic Solv.naphtha	0.0146994									
123319	HYDROQUINONE	7.744E-05									
5160021	BENZENESULFONIC ACID, 5-CHLORO-2	0.0127938									
1333864	CARBON BLACK	0.0028431									
8050097	colophony (Rosin core solder thermal	0.0028657									
1332587	KAOLIN	0.0014215									
68188147		0.0014329									
136527		3.397E-06									
108316	MALEIC ANHYDRIDE	3.397E-06									
57472681		0.0072692									
14038438											
34590948	DIPROPYLENE GLYCOL METHYL ETHER	0.085666	9092.0245		pass	pass					

ANNUAL SCREENING ANALYSIS

Tox-A-Matic 2012
GAMSE LITHO
Jenkins Environmental
March 21, 2019

16	Typical hours of emissions per 8-hour work day
5	Typical days per week of emissions
52	Typical weeks per year of emissions
yes	Building downwash (default is yes)
0	Screen3 or AERSCREEN model run maximum concentration (ug/m3) from a 1 lb/hr emission rate
0.08	Annual multiplier (default is 0.08)

CAS	Name	Emissions Controlled lb/yr	Screening Level ug/m3	Small Emitter 1	AER	Screen 3 or AERSCREEN Impact ug/m3	% screen Level	Pass?	Bomb
				26.11.15.03B(3)	26.11.16.02A(4)				
108883	TOLUENE	356.706							
8052413	STODDARD SOLVENT	11.463112							
1330207	XYLENE	174.844							
64742489	Naphthol Spirits (for Paints Only)	483.34							
64742956	Naphtha	219.7							
9016459	TERGITOL NP-33 (nonionic)	18.8094							
95636	PSEUDOCUMENE	131.82							
98828	CUMENE	21.97							
100414	ETHYL BENZENE	0.728							
67641	ACETONE	458.622							
67630	ISOPROPYL ALCOHOL	4838.1452							
128370	2,6-DITERT-BUTYL-P-CRESOL	3.024							
1336216	AMMONIUM HYDROXIDE	13257.071							
111762	2-BUTOXYETHANOL (EGBE)	68.545698							
107211	ETHYLENE GLYCOL	92.07224							
8042475	Oil Mist, mineral	32.447028							
141786	ETHYL ACETATE	1229.52							
64175	ETHANOL	2.628							
109604	N-PROPYL ACETATE	1108.5							
108214	ISOPROPYL ACETATE	404.04							
9004700	PYROXYLIN, PLASTIC SCRAP								
71238	PROPANOL								
57556	PROPYLENE GLYCOL	11747.211							
108010	DIMETHYLAMINOETHANOL	1168.8196							
119619	BENZOPHENONE	2.115							
15625895	TRIMETHYLOLPROPANE TRIACRYLATE	988.97713							
105599	METHYLDIETHANOLAMINE	2.538							
141435	ETHANOLAMINE	1.0404							
577117		5821.167							
64742536	Petroleum Distillate-Hydrotreated Ligh	278.40027							
64742547	Petroleum Lub. Oil	67.738785							
64742467	Maggie Oil (mist)	52.868941							
64197	ACETIC ACID	9.006192							
64742967		9.56043							
64741919		6.5934							
68474577		2.45385							
64741862	Hydrotreated Petroleum Oil	0.49077							
42978665	Tripropylene Glycol Diacrylate	456.52975							
55818570		36.794625							
64742945	Aromatic Hydrocarbon	62.698							
64742887	Med. Aliphatic Solvent Naphtha	758.06825							
112345	ETHANOL, 2-(2-BUTOXYETHOXY)-	31.349							
766417		158.3766							
112072	ETHYLENE GLYCOL MONOBUTYL ETHEI	27.522							
6484522	AMMONIUM NITRATE WITH ORGANIC	27.522							
64742898	Lig.aliphatic Solv.naphtha	61.1496							
123319	HYDROQUINONE	0.32214							
5160021	BENZENESULFONIC ACID, 5-CHLORO-2	53.2224							
1333864	CARBON BLACK	11.8272							
8050097	colophony (Rosin core solder thermal c	11.9214							
1332587	KAOLIN	5.9136							
68188147		5.9607							
136527		0.01413							
108316	MALEIC ANHYDRIDE	0.01413							
57472681		30.24							
14038438									
34590948	DIPROPYLENE GLYCOL METHYL ETHER	356.37075							

3/21/19

08:19:06
  *** SCREEN3 MODEL RUN ***
  *** VERSION DATED 13043 ***

 GAMSE LITHO FLEXO

 SIMPLE TERRAIN INPUTS:
    SOURCE TYPE   =   POINT
    EMISSION RATE (G/S)   =   1.00000
    STACK HEIGHT (M)   =   10.6700
    STK INSIDE DIAM (M)   =   0.3500
    STK EXIT VELOCITY (M/S)=   16.5001
    STK GAS EXIT TEMP (K) =   310.9278
    AMBIENT AIR TEMP (K)   =   293.1500
    RECEPTOR HEIGHT (M)   =   0.0000
    URBAN/RURAL OPTION   =   URBAN
    BUILDING HEIGHT (M)   =   7.3152
    MIN HORIZ BLDG DIM (M) =   60.9600
    MAX HORIZ BLDG DIM (M) =   105.1560

 THE REGULATORY (DEFAULT) MIXING HEIGHT OPTION WAS SELECTED.
 THE REGULATORY (DEFAULT) ANEMOMETER HEIGHT OF 10.0 METERS WAS ENTERED.

 BUOY. FLUX =   0.283 M**4/S**3; MOM. FLUX =   7.861 M**4/S**2.

 *** FULL METEOROLOGY ***

 ****
 *** SCREEN AUTOMATED DISTANCES ***
 ****

 *** TERRAIN HEIGHT OF   0. M ABOVE STACK BASE USED FOR FOLLOWING
DISTANCES ***

   DIST   CONC   U10M   USTK MIX HT   PLUME   SIGMA   SIGMA
    (M)   (UG/M**3)   STAB (M/S)   (M/S)   (M)   HT (M)   Y (M)   Z (M)
DWASH
 ------- ---------- ---- ----- ----- ------ ------ ------ ------
-----
     12.   0.7710E-04   1   1.0   1.0   320.0   27.83   5.17   4.52
NO
    100.   512.1   4   1.5   1.5   480.0   15.53   15.69   13.79
SS

 MAXIMUM 1-HR CONCENTRATION AT OR BEYOND   12. M:
     49.   731.7   3   1.5   1.5   480.0   13.90   10.89   10.00
SS

  DWASH=   MEANS NO CALC MADE (CONC = 0.0)
  DWASH=NO MEANS NO BUILDING DOWNWASH USED

```
  DWASH=HS MEANS HUBER-SNYDER DOWNWASH USED
  DWASH=SS MEANS SCHULMAN-SCIRE DOWNWASH USED
  DWASH=NA MEANS DOWNWASH NOT APPLICABLE, X<3*LB

 *********************************
 *** SCREEN DISCRETE DISTANCES ***
 *********************************

 *** TERRAIN HEIGHT OF  0.0 M ABOVE STACK BASE USED FOR FOLLOWING
DISTANCES ***

   DIST     CONC              U10M   USTK  MIX HT   PLUME   SIGMA   SIGMA
    (M)   (UG/M**3)   STAB  (M/S)   (M/S)    (M)   HT (M)   Y (M)   Z (M)
DWASH
 -------  ----------  ----  -----  -----  ------  ------  ------  ------
-----
      1.    0.000        1     1.0    1.0   320.0   27.83    1.55    1.53
NO
  DWASH=   MEANS NO CALC MADE (CONC = 0.0)
  DWASH=NO MEANS NO BUILDING DOWNWASH USED
  DWASH=HS MEANS HUBER-SNYDER DOWNWASH USED
  DWASH=SS MEANS SCHULMAN-SCIRE DOWNWASH USED
  DWASH=NA MEANS DOWNWASH NOT APPLICABLE, X<3*LB

 ***************************************
     *** REGULATORY (Default) ***
    PERFORMING CAVITY CALCULATIONS
   WITH ORIGINAL SCREEN CAVITY MODEL
          (BRODE, 1988)
 ***************************************

  *** CAVITY CALCULATION - 1 ***       *** CAVITY CALCULATION - 2 ***
   CONC (UG/M**3)     =    0.000        CONC (UG/M**3)     =    0.000
   CRIT WS @10M (M/S) =    99.99        CRIT WS @10M (M/S) =    99.99
   CRIT WS @ HS (M/S) =    99.99        CRIT WS @ HS (M/S) =    99.99
   DILUTION WS (M/S)  =    99.99        DILUTION WS (M/S)  =    99.99
   CAVITY HT (M)      =     7.32        CAVITY HT (M)      =     7.32
   CAVITY LENGTH (M)  =    40.06        CAVITY LENGTH (M)  =    34.60
   ALONGWIND DIM (M)  =    60.96        ALONGWIND DIM (M)  =   105.16

 CAVITY CONC NOT CALCULATED FOR CRIT WS > 20.0 M/S.  CONC SET = 0.0

 ***************************************
      END OF CAVITY CALCULATIONS
 ***************************************

     ***************************************
     *** SUMMARY OF SCREEN MODEL RESULTS ***
     ***************************************

  CALCULATION        MAX CONC    DIST TO   TERRAIN
   PROCEDURE        (UG/M**3)    MAX (M)    HT (M)
 --------------    -----------   ---------   -------
 SIMPLE TERRAIN       731.7          49.        0.
```

TAP COMPLIANCE ANALYSIS:

1336216 AMMONIUM HYDROXIDE: 1 HR SCREENING LEVEL 501.74 µg/m3
8 HR SCREENING LEVEL 358.38 µg/m3

FINAL SCREENING RESULT: 1 HR (731.7)(3.19)(.126) = 294.10 µg/m^3 PASS
8 HR (731.7)(0.7)(3.19)(.126) = 205.87 µg/m^3 PASS

57556 PROPYLENE GLYCOL: 8 HR SCREENING LEVEL 308.0 µg/m3

FINAL SCREENING RESULT: 8 HR (731.7)(0.7)(2.82)(.126) = 181.99 µg/m^3 PASS

2018 ANNUAL COMPLIANCE CERTIFICATION

PART 70 TITLE V FORM A-COMP

OMB Control No. 2060-0336

U.S. ENVIRONMENTAL PROTECTION AGENCY
APPLICATION FOR FEDERAL OPERATING PERMIT, 40 CFR PART 70

FORM A-COMP - ANNUAL COMPLIANCE CERTIFICATION

INSTRUCTIONS: There are 3 pages to this form. On this page, complete Sections A and B once with respect to the entire annual compliance certification.

A. GENERAL INFORMATION

1. Identifying Information.

Source or company name: Gamse Lithographing Company, Inc.

Mailing address: Street or P.O. Box 7413 Pulaski Highway

City Baltimore State MD ZIP 21237 -

Contact person Matt Haynes Title Director of Quality Assurance

Telephone (410) 866 - 4700 Ext. _____ Part 70 permit no. 24-510-01149

2. Reporting Period The reporting period should be the one-year, or shorter period, required by your part 70 permit. It will be assumed that the beginning date begins and ends at Midnight (12 A.M.), unless you specify otherwise.

Period beginning 01/01/2018 Period ending 12/31/2018

B. CERTIFICATION OF TRUTH, ACCURACY, AND COMPLETENESS

1. Responsible Official. Identify the responsible official and provide contact information.

Name: (Last) Haynes (First) Matt (Middle) _____

Title Director of Quality Assurance

Street or Post Office Box 7413 Pulaski Highway

City Baltimore State MD ZIP 21237 -

Telephone (410) 866 - 4700 Ext. _____ Facsimile (410) 866 - 5672

2. Certification of Truth, Accuracy and Completeness. The Responsible Official must sign this statement after the form is completed for each applicable requirement.

I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in these documents are true, accurate and complete.

Name (signed) _____

Name (printed or typed) Matt Haynes Date: 03 / 25 / 2019

INSTRUCTIONS: Use this page to describe the compliance status of each permit term or condition. This page may be used to provide information on 2 different permit terms or conditions. Copy this page as many times as necessary to cover all permit terms and conditions.

C. COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

Identify (Describe and Cross-reference the Permit Term or Condition	Unit ID(s): **Facility Wide**	Compliance status during reporting period
Section IV Number 1 **Control of VOC Emissions** **COMAR 26.11.19.16C&D** – Control of VOC Equipment Leaks "General Requirements. A person subject to this regulation shall comply with all of the following requirements: (1) Visually inspect all components on the premises for leaks at least once each calendar month. (2) Tag any leak immediately so that the tag is clearly visible. The tag shall be made of a material that will withstand any weather or corrosive conditions to which it may be normally exposed. The tag shall bear an identification number, the date the leak was discovered, and the name of the person who discovered the leak. The tag shall remain in place until the leak has been repaired. (3) Take immediate action to repair all observed VOC leaks that can be repaired within 48 hours. (4) Repair all other leaking components not later than 15 days after the leak is discovered. If a replacement part is needed, the part shall be ordered within 3 days after discovery of the leak, and the leak shall be repaired within 48 hours after receiving the part. (5) Maintain a supply of components or component parts that are recognized by the source to wear or corrode, or that otherwise need to be routinely replaced, such as seals, gaskets, packing, and pipefitting. (1) Maintain a log that includes the name of the person conducting the inspection and the date on which leak inspections are made, the findings of the inspection, and a list of leaks by tag identification number. The log shall be made available to the Department upon request. Leak records shall be maintained for a period of not less than 2 years from the date of their occurrence." "Exceptions. Components that cannot be repaired as required in this regulation because they are inaccessible, or that cannot be repaired during operation of the source, shall be identified in the log and included within the source's maintenance schedule for repair during the next source shutdown."		Intermittent Compliance _X_ Continuous Compliance

D. METHODS USED TO DETERMINE COMPLIANCE

Describe all methods or means you used to determine compliance with the permit term and condition described in Section C. For each monitoring method or means you must specify whether it produced intermittent or continuous data.

The Permittee visually inspects all components on the premises for VOC leaks at least once each calendar month following the procedures specified in COMAR 26.11.19.16. The Permittee maintains a log that includes the date on which leak inspections are made, the name of the person conducting the leak inspection, the findings of the inspection, a list of leaks by tag identification numbers and the identity of components that cannot be repaired as required in this regulation because they are inaccessible, or that cannot be repaired during operation of the source. All inspections records and logs are made available to the Department upon request.

C. COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

Identify (Describe and Cross-reference the Permit Term or Condition	Unit ID(s):	Compliance status during reporting period
Section IV Number 2 **A. Control of Visible Emissions** **COMAR 26.11.06.02A&C** Visible Emissions from Process Equipment (1) "In Areas III and IV a person may not cause or permit the discharge of emissions from any installation or building, other than water in an uncombined form, which is visible to human observers." (2) Exceptions - "The visible emissions standards in §C of this regulation do not apply to emissions during start-up and process modification or adjustments, or occasional cleaning of control equipment, if: 1. The visible emissions are not greater than 40 percent opacity; and 2. The visible emissions do not occur for more than 6 consecutive minutes in any sixty minute period." **B. Control of Particulate Matter** **COMAR 26.11.06.03B(2)a** - Particulate Matter from Confined Sources Located in Areas III and IV "A person may not cause or permit to discharged into the outdoor atmosphere from any other installation, particulate matter in excess of 0.03 gr/SCFD." **C. Control of VOC Emissions** **COMAR 26.11.19.10C** - Requirements for Flexographic and Rotogravure Printing. "A person who owns or operates a printing press that uses flexographic, packaging rotogravure, or publication rotogravure methods and is a major stationary source as defined in Regulation .01B(4) of this chapter, shall: (1) Reduce emissions by using water-based inks that contain less than 25 percent VOC by volume of volatile portion of the ink, or high solids inks that contain not less than 60 percent nonvolatile; or (2) If compliance with the requirements of Sec. C(1) of this regulation cannot be achieved, reduce the VOC content of each ink, or reduce the average VOC content of inks used at each press as follows: a. 60 percent reduction for flexographic presses, b. 65 percent reduction for packaging rotogravure presses, and c. 75 percent reduction for publication rotogravure presses." EU 1 complies with the option described in COMAR 26.11.19.10C(2)b by using a control device (a catalytic oxidizer) to reduce VOC emissions by greater than or equal to 65%. **D. Operational Limitation** The catalytic oxidizer shall be operated so that the temperature in the inlet gas stream is maintained at a temperature level of at least 600° Fahrenheit when the presses are running. **[Reference: PTC 03-9-0159M issued January 19, 1995]** The flue gas from the rotogravure press shall exhaust through the catalytic oxidizer. **[Reference: PTC 03-90159M issued Jan 19, 1995]** **See CAM Plan (40 CFR Part 64 – Compliance Assurance Monitoring) for additional requirements.** **E. Control of Hazardous Air Pollutants (HAP)** **40 CFR Part 63 Subpart KK** – National Emission Standards for the Printing and Publishing Industry: Product and packaging rotogravure and wide-web flexographic printing. The Gamse Lithography facility is an area source for HAP emissions. The Permittee has chosen to maintain records to demonstrate that HAP emissions are below the major source thresholds.	**EU-1 (6-0159)** **OUT OF SERVICE IN 2018**	Intermittent Compliance _ _ Continuous Compliance

§63.820 – Applicability (a) The provisions of this subpart apply to: (2) Each new and existing facility at which publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing presses are operated for which the owner or operator chooses to commit to, and meets the criteria of paragraphs (a)(2)(i) and (a)(2)(ii) of this section for purposes of establishing the facility to be an area source with respect to this subpart. (i) Use less than 9.1 Mg (10 tons) per each rolling 12-month period of each HAP at the facility, including materials used for source categories or purposes other than printing and publishing, and (ii) Use less than 22.7 Mg (25 tons) per each rolling 12-month period of any combination of HAP at the facility, including materials used for source categories or purposes other than printing and publishing. (3) Each facility for which the owner or operator chooses to commit to and meets the criteria stated in paragraph (a)(2) of this section shall be considered an area source, and is subject only to the provisions of §63.829(d) and §63.830(b)(1) of this subpart. (4) Each facility for which the owner or operator commits to the conditions in paragraph (a)(2) of this section may exclude material used in routine janitorial or facility grounds maintenance, personal uses by employees or other persons, the use of products for the purpose of maintaining electric, propane, gasoline and diesel powered motor vehicles operated by the facility, and the use of HAP contained in intake water (used for processing or noncontact cooling) or intake air (used either as compressed air or for combustion). (5) Each facility for which the owner or operator commits to the conditions in paragraph (a)(2) of this section to become an area source, but subsequently exceeds either of the thresholds in paragraph (a)(2) of this section for any rolling 12-month period (without first obtaining and complying with other limits that keep its potential to emit HAP below major source levels), shall be considered in violation of its commitment for that 12-month period and shall be considered a major source of HAP beginning the first month after the end of the 12-month period in which either of the HAP-use thresholds was exceeded. As a major source of HAP, each such facility would be subject as noted in paragraph (a)(1) of this section and would no longer be eligible to use the provisions of paragraph (a)(2) of this section, even if in subsequent 12-month periods the facility uses less HAP than the thresholds in paragraph (a)(2) of this section. (6) An owner or operator of an affected source subject to paragraph (a)(2) of this section who chooses to no longer be subject to paragraph (a)(2) of this section shall notify the Administrator of such change. If, by no longer being subject to paragraph (a)(2) of this section, the facility at which the affected source is located becomes a major source: (i) The owner or operator of an existing source must continue to comply with the HAP usage provisions of paragraph (a)(2) of this section until the source is in compliance with all relevant requirements for existing affected sources under this subpart; (ii) The owner or operator of a new source must continue to comply with the HAP usage provisions of paragraph (a)(2) of this section until the source is in compliance with all relevant requirements for new affected sources under this subpart. **§63.822(a) -** For the purposes of this permit, a "month" means a calendar month or a prespecified period of 28 days to 35 days.	Unit ID(s): **EU-1 (6-0159)** **OUT OF SERVICE IN 2018**	Compliance status during reporting period Intermittent Compliance __ Continuous Compliance

D. METHODS USED TO DETERMINE COMPLIANCE

Describe all methods or means you used to determine compliance with the permit term and condition described in Section C. For each monitoring method or means you must specify whether it produced intermittent or continuous data.

The Permittee performed a destruction removal efficiency test within the past 5 years. Average percent removal was measured to be 96.81%. Samples of the catalyst are taken annually and are approved by the Department. These samples are analyzed to determine the catalyst activity, surface area, and contamination of catalyst poisons.
Monthly, Method 22-like visible emission observations are performed and the results are recorded. If exhaust other than water vapor is visible: (1) Permittee inspects all control equipment to determine the cause and (2) performs necessary repairs within 48 hours so vapors are eliminated, (3) documents both the inspections and repairs, (4) performs an EPA Method 9 observation until vapors are eliminated. The Permittee monitors and records the temperature of the gas stream entering and leaving the catalyst bed and the hours of operation of the heat-set press. When degraded catalyst material is replaced or reconditioned. Records of the following must be kept: (1) visible emission observations and any corrective action that took place, (2) design data for the control device, (3) daily hours of operation of the heat set press, (4) monthly heat set ink usage, (5) oxidizer maintenance, (6) chart recordings of the temperature of gas stream entering and leaving the bed, and (6) results of the required analysis. The Permittee reports incident of visible emissions and semiannual catalyst sampling and testing to the Department.

C. COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

Identify (Describe and Cross-reference the Permit Term or Condition	Unit ID(s):	Compliance status during reporting period
Section IV Number 3 **Control of VOC Emissions** **[COMAR 26.11.19.10C]** - Requirements for Flexographic and Rotogravure Printing. "A person who owns or operates a printing press that uses flexographic, packaging rotogravure, or publication rotogravure methods and is a major stationary source as defined in Regulation .01B(4) of this chapter, shall: *(1) Reduce emissions by using water-based inks that contain less than 25 percent VOC by volume of volatile portion of the ink, or high solids inks that contain not less than 60 percent nonvolatile; or* (2) If compliance with the requirements of Sec. C(1) of this regulation cannot be achieved, reduce the VOC content of each ink, or reduce the average VOC content of inks used at each press as follows: a. 60 percent reduction for flexographic presses, b. 65 percent reduction for packaging rotogravure presses, and c. 75 percent reduction for publication rotogravure presses." *EU 11 & 12 comply with the option described in COMAR 26.11.19.10C(1) by using water-based and high solids inks.*	**EU – 11 (6-3017)** **EU – 12 (6-2825)** **EU - 13 (6-2936)** **EU- 14 (6-3123)**	Intermittent Compliance _X_ Continuous Compliance

D. METHODS USED TO DETERMINE COMPLIANCE

Describe all methods or means you used to determine compliance with the permit term and condition described in Section C. For each monitoring method or means you must specify whether it produced intermittent or continuous data.

The permittee maintains records of monthly hours of operation and material use of each press and monthly amounts and composition of all materials used including MSDS sheets for a period of five(5) years. All of the records should be made available to the Department.

C. COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

Identify (Describe and Cross-reference the Permit Term or Condition	Unit ID(s):	Compliance status during reporting period
Section IV Number 4 **Control of VOC Emissions** **A. COMAR 26.11.19.11C** – Standards for Sheet-Fed Lithographic Printing "A person may not operate a sheet-fed letter or lithographic press with a cylinder width of 18 inches or greater unless: (1) The fountain solution is refrigerated to maintain a temperature of less than 55° F if isopropyl alcohol is used; (2) A temperature indicator is installed to monitor the fountain temperature if the solution is refrigerated; and (3) The fountain solution contains less than 8.5 percent isopropyl alcohol by weight." **B. COMAR 26.11.19.11E** – Requirements for Cleaning Printing Equipment. "A person who uses materials containing VOC to clean printing equipment shall: (1) Store all waste materials containing VOC, including cloth and paper, in closed containers; (2) Maintain lids on all VOC-containing cleanup materials when not in use; (3) Establish, in writing, good operating practices for persons who clean printing equipment to minimize use of VOC-containing materials, with these good operating practices being made available to the Department on request; and (4) Upon request of the Department, participate in the evaluation of non-VOC and low-VOC materials used to clean printing equipment when these materials have the potential to be appropriate substitutes for currently used materials."	**EU-5 (6-2156)** **EU-6 (6-2634)** **EU-7 (6-2818)……..** **EU-8 (6-1983)** **EU-9 (6-2376)**	**OUT OF SERVICE** Intermittent Compliance _X_ Continuous Compliance

D. METHODS USED TO DETERMINE COMPLIANCE

Describe all methods or means you used to determine compliance with the permit term and condition described in Section C. For each monitoring method or means you must specify whether it produced intermittent or continuous data.

In the event that the permittee uses isopropyl alcohol in the fountain solutions, the Permittee checks the fountain solution temperature sensors with a calibrated thermometer at least once every thirty days and records the data. All the presses using isopropyl alcohol are checked daily and the percent of isopropyl alcohol is recorded. Hydrometer reading are taken and recorded after the alcohol is added each time.

The Permittee uses closed containers to store press clean-up materials. At least monthly inspections are conducted to verify compliance with (1) the use of closed containers to store waste and other VOC containing materials and (2) to verify that good operating practices are being implemented. Logs of the results of the at least monthly inspections are maintained. The logs contain the results of the inspections, the date of the inspection, and the name of the person conducting the inspection. The logs are available for review upon request. A copy of the Permittee good operating practices are maintained on site. The Permittee was not requested to participate in any testing by the Department during the reporting year. The Permittee was not requested to participate in any testing by the Department during the reporting period. This condition has no testing requirements.

The following records are kept 5 years: (1) monthly hours of operation and material use of each press (2) monthly amounts and composition of all fountain solutions including MSDS sheets, and (3) the required fountain solution temperature readings and hydrometer readings. All of the records should be made available to the Department.

C. COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

Identify (Describe and Cross-reference the Permit Term or Condition	Unit ID(s):	Compliance status during reporting period
Section IV Number 5 **Control of VOC Emissions** **A. COMAR 26.11.19.11B&D** – Requirements for Lithographic Web Printing. (1) "A person who owns or operates a premises from which the actual VOC emissions from all lithographic web printing presses are 100 pounds or more per day after January 1, 1990 shall operate the press only if the dryer exhaust is ducted to a control device that is constructed, operated, and maintained to achieve an overall control efficiency of 90 percent or more; and (2) The Permittee may not use isopropyl alcohol in the fountain solution." *The Permittee complies with COMAR 26.11.19.11B&D by using low solvent materials with total VOC emission less than 100 lb/day. VOC emissions from materials used to clean printing equipment are not considered in determining the applicability of §D(1).[Reference: COMAR 26.11.19.11B(4)]* **B. COMAR 26.11.19.11E** – Requirements for Cleaning Printing Equipment. "A person who uses materials containing VOC to clean printing equipment shall: (1) Store all waste materials containing VOC, including cloth and paper, in closed containers; (2) Maintain lids on all VOC-containing cleanup materials when not in use; (3) Establish, in writing, good operating practices for persons who clean printing equipment to minimize use of VOC-containing materials, with these good operating practices being made available to the Department on request; and (4) Upon request of the Department, participate in the evaluation of non-VOC and low-VOC materials used to clean printing equipment when these materials have the potential to be appropriate substitutes for currently used materials."	**EU-10 (6-2377)**	_ _ Intermittent Compliance X Continuous Compliance

D. METHODS USED TO DETERMINE COMPLIANCE

Describe all methods or means you used to determine compliance with the permit term and condition described in Section C. For each monitoring method or means you must specify whether it produced intermittent or continuous data.

The permittee maintains records of monthly hours of operation and material use of each press and monthly amounts and composition of all materials used including MSDS sheets for a period of five(5) years. All of the records should be made available to the Department.

The Permittee uses closed containers to store press clean-up materials. At least monthly inspections are conducted to verify compliance with (1) the use of closed containers to store waste and other VOC containing materials and (2) to verify that good operating practices are being implemented. Logs of the results of the at least monthly inspections are maintained. The logs contain the results of the inspections, the date of the inspection, and the name of the person conducting the inspection. The logs are available for review upon request. A copy of the Permittee good operating practices are maintained on site. The Permittee was not requested to participate in any testing by the Department during the reporting year. The Permittee was not requested to participate in any testing by the Department during the reporting period. This condition has no testing requirements.

CERTIFICATION OF PLANT-WIDE CONDITIONS
(SECTION III OF PART 70 OPERATING PERMIT)GAMSE LITHOGRAPHING

Indicate compliance with the following requirements of Section III of your Part 70 Operating Permit in the space provided below:

1. **Particulate Matter from Construction and Demolition**
   [COMAR 26.11.06.03D]

   Continuous compliance. There was no construction or demolition at the facility during the reporting period.

2. **Open Burning**
   [COMAR 26.11.07]

   Continuous compliance. The facility does not permit open burning.

3. **Air Pollution Episode**
   [COMAR 26.11.05.04]

   Continuous compliance. The facility has not been requested to prepare an air pollution episode plan.

4. **Report of Excess Emissions and Deviations**
   [COMAR 26.11.01.07] and [COMAR 26.11.03.06C(7)]

   Continuous Compliance. There were no excess emissions to report on semi-annual reports submitted to the Department.

5. **Accidental Release Provisions**
   [COMAR 26.11.03.03B(23)] and [40 CFR 68]

   Continuous compliance. In the event the Permittee should become subject to 40 CFR Part 68 during the term of this permit, the Permittee will submit a risk management plan by the date specified in 40 CFR Part 68.150.

6. **General Testing Requirements**
   [COMAR 26.11.01.04]

   Continuous Compliance. A performance stack test was conducted on October 13, 2016 as part of CAM Compliance requirement. The last destruction removal efficiency test was conducted on July 28, 2015 (Testing frequency is every 5 years).

7. **Emissions Test Methods**
   [COMAR 26.11-01.05]

   *Continuous Compliance***.** A stack test protocol was submitted to the Department prior to conducting the last performance stack test to obtain approval of all methods used for the June 29, 2015 testing.

8. Emission Certification Report
[COMAR 26.11.02.19C] and [COMAR 26.11.02.19D]

Continuous Compliance. The Permittee annually certifies actual emissions of regulated pollutants. The report was submitted prior to April 1, 2016.

9. Compliance Certification Report
[COMAR 26.11.03.06G (6) and (7)]

Continuous Compliance. The Permittee submitted to the Department and EPA Region III a report certifying compliance with each item of the Part 70 permit prior to April 1, 2016.

10. Certification by Responsible Official
[COMAR 26.11.02.02F]

Continuous Compliance. Compliance was certified by a responsible official.

11. Sampling and Emissions Testing Record Keeping
[COMAR 26.11.03.06C95)]

Continuous Compliance. A performance stack test was conducted within the past five years. All records will be maintained in accordance with the regulations.

12. General Record Keeping
[COMAR 26.11.03.06(c)(5) and (6)

Continuous Compliance. The Permittee retains records of all monitoring data and support information for a period of five years.

13. General Conformity (N/A)
[COMAR 26.11.36.03]

Not Applicable

14. Asbestos Provisions
[40 CFR Part 61, Subpart M]

Continuous Compliance. No renovations or demolition took place at the facility involving asbestos containing materials during the reporting period.

15. Ozone Depleting Regulations
[40 CFR Part 82, Subpart F]

Not Applicable

16. Acid Rain Permit (Not Applicable)

Not Applicable

E. DEVIATIONS FROM PERMIT TERMS AND CONDITIONS

The table below is appropriate for reporting deviations from permit terms or conditions that have been previously reported in a six-month monitoring report (assuming that the most recent six-month monitoring report and the annual compliance certification both end on the same date). Copy this page as many times as necessary to include all such deviations. Note that you may cross-reference deviations already reported in the six-month report in the first column of the table, and leave the other columns blank, however such cross-reference must be clear and unambiguous with respect to the six-month monitoring report and the individual deviation being cross-referenced. In addition, in the first column, whether you cross-reference deviations or not, you must indicate whether each deviation is a "possible exceptions" to compliance." If a deviation is not a possible exception to compliance, please briefly explain why it is allowed by the permit and cite the relevant permit term that provides the excuse. In addition, if there are deviations that have never been reported in writing to the permitting authority, more information than required by this table will be needed. In such cases, you must include information consistent with Section D of the six-month monitoring report form, and indicate whether it is a "possible exception to compliance."

Permit Term for Which There is a Deviation & Whether the Deviation is a "Possible Exception to Compliance"	Emission Units (unit IDs)	Deviation Time Periods Date (mo/day/yr) Time (hr/min) Time Zone
NO DEVIATIONS RECORDED FOR 2018		Beginning _______:_____ _____ Ending _____:_____ _____
		Beginning ____/_____/_____ _____:_____ _____ Ending ____/_____/_____ _____:_____ _____

Section 2

Facility Description Summary

SECTION 2. FACILITY DESCRIPTION SUMMARY

1. Major Activities of Facility

Briefly describe the major activities, including the applicable SIC Code(s) and end product(s).

2754- COMMERCIAL PRINTING , GRAVURE

GAMSE LITHOGRAPHING COMPANY IS A COMMERCIAL LITHOGRAPHIC, FLEXOGRAPHIC, IN BALITMORE COUNTY, MARYLAND. THE FACILITY CONSISTS OF A SHEET-FED LITHOGRAPHIC PRINITING AREA, AND FLEXOGRAPHIC PRINITING AREA, A, BINDERY AREA, AND WAREHOUSE. THE COMPANY CURRENTLY HAS IN OPERATION, TWO (2) SHEET-FED LITHOGRAPHIC PRESSES, ONE (1) LITHOGRAPHIC NON-HEAT SET WEB PRESS, AND FOUR (4) FLEXOGRAPHIC WEB PRINITING PRESSES. THE BINDERY IS USED TO CUT, SHAPE, AND FOLD THE VARIOUS PRINTED MATERIALS PRODUCED AT THE FACILITY. THE FACILITY'S FINISHED GOODS WAREHOUSE AREA IS LOCATED AT THE REAR OF THE FACILITY.

2. Facility-Wide Emissions

A. This facility is required to obtain a Part 70 Operating Permit because it is:
Check appropriate box:

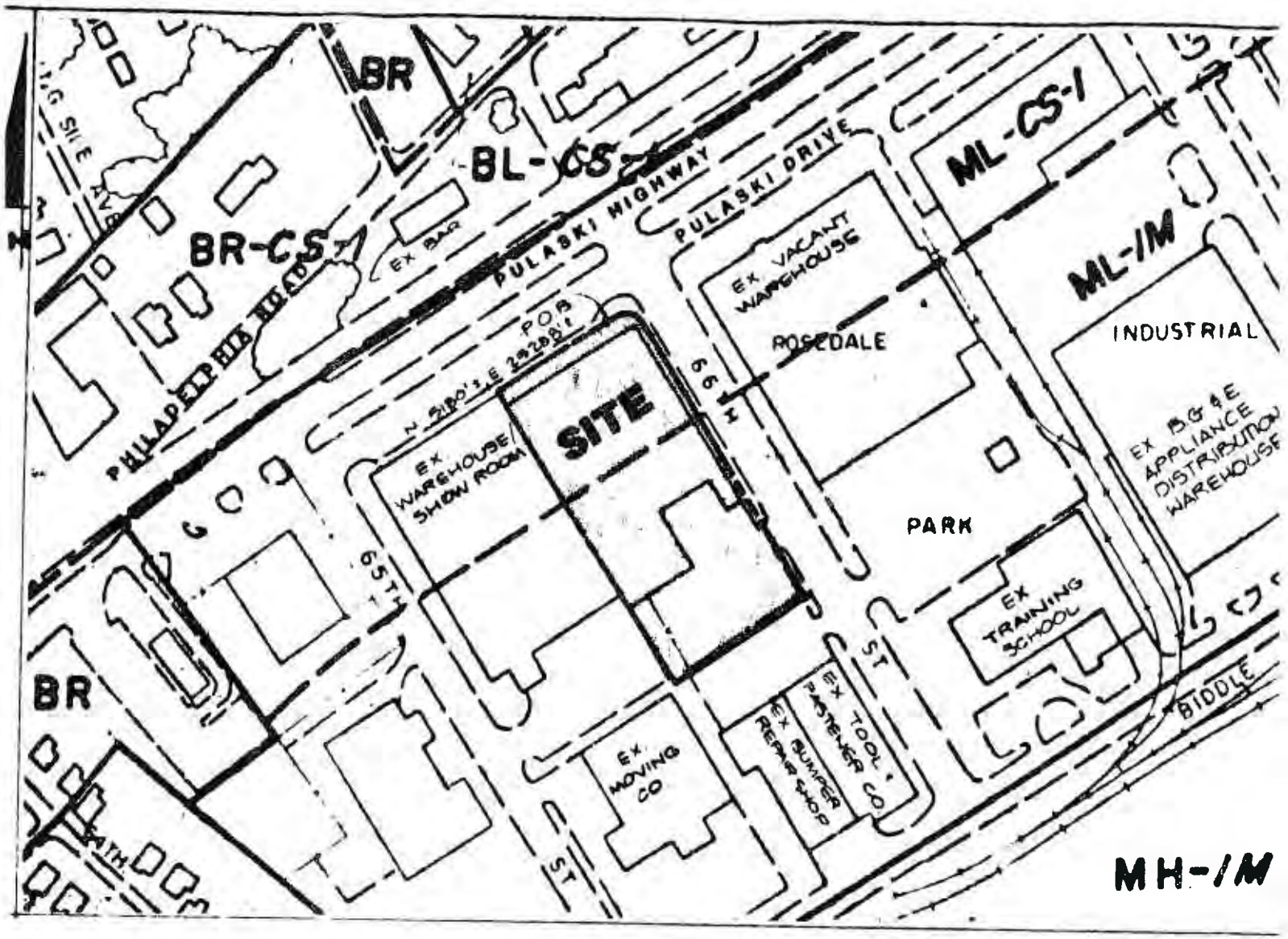
- ☐ Actual Major
- X Potential Major·
- ☐ Solid Waste Incineration Unit Requiring Permit Under § 129(e) of CAA

B. List the actual facility-wide emissions below:

PM10 0.0 NOx 0.0 VOC 18.99 SOx 0.00 CO 0.00 HAPs 0.354

3. Include With the Application:

Flow Diagrams showing all emissions units, emission points, and control devices;
Emissions Certification Report (copy of the most recent submitted to the Department.)



Portion of Baltimore County 200' Scale Zoning Map NE 2E.

NOTES:

1. Current Owner / Applicant

   Gamse Lithographing Co. Inc.
   7413 Pulaski Highway
   Baltimore, MD 21237

2. Site Area:

   2.46 Ac ± (Gross)
   2.03 Ac ± (Net)

3. Existing Use:
   Proposed Use:

   Light Industrial (Printing Co.)
   13,800 s.f. Addition to Ex. Printing Co.

4. Site Data:

   Tax Map 96, Block 3, Parcel 9
   Deed Reference: 8372/175
   Tax Account No.: 1518472232
   Zoning: ML-CS-1 / ML-IM
   Election Dist: 15
   Councilmanic Dist: 7
   Street Address:
   7413 Pulaski Highway
   Baltimore, MD 21237

5. Setbacks:

Section 3

Emissions Unit Descriptions

SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: **EU-1 , EU-2, AND EU-3 (PRESS #47)** **(REMOVED FROM SERVICE)** 1a. Date of installation (month/year): 01/1995	2. MDE Registration No.:(if applicable) 09-01591

3. Detailed description of the emissions unit, including all emission point(s) and the assigned number(s):

ONE (1) - 29 INCH, SIX (6) COLOR, CHAMPLAIN CAVALIER ROTOGRAVURE PRINTING PRESS EQUIPPED WITH A TEC QUANTUM 300 CATALYTIC OXIDIZER

4. Federally Enforceable Limit on the Operating Schedule for this Emissions Unit:

General Reference:_____

Continuous Processes: 24 hours/day 365 days/year

Batch Processes: _____ hours/batch _____ batches/day

_____ days/year

5. Fuel Consumption:

	Type(s) of Fuel	% Sulfur	Annual Usage (specify units)
1.	Natural Gas	N/A	59567 therms
2.			
3.			

6. Emissions in Tons:

A. Actual Major: _____ Potential Major: X (note: before control device)

B. Actual Emissions: NOx 0.0 SOx 0.0 VOC 0.0 CO 0.0 PM10 0.0 HAPs 0.0

SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: **EU-4 (REMOVED FROM SERVICE)** 1a. Date of installation (month/year): 1995	2. MDE Registration No.:(if applicable) 09-0159

3. Detailed description of the emissions unit, including all emission point(s) and the assigned number(s):

A FORTY – ONE (41) GALLON SOLVENT WASH TANK WITH COVER LOCATED IN THE GRAVURE PRESS ROOM.

4. Federally Enforceable Limit on the Operating Schedule for this Emissions Unit:

General Reference:_____

Continuous Processes: 24 hours/day 365 days/year

Batch Processes: _____ hours/batch _____ batches/day

_____ days/year

5. Fuel Consumption:

	Type(s) of Fuel	% Sulfur	Annual Usage (specify units)
1.	N/A	N/A	N/A
2.			
3.			

6. Emissions in Tons:

A. Actual Major: _____ B. Potential Major: X (note: before control device)

B. Actual Emissions: NOx 0 SOx 0 VOC 0 CO 0 PM10 0 HAPs 0 .

(The emissions from this unit are included with the emissions from EU-1 thru EU-3.)

SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: **EU-5** (PRESS NO. 42) 1a. Date of installation (month/year): 06/1995	2. MDE Registration No.:(if applicable) 09-6-2156

3. Detailed description of the emissions unit, including all emission point(s) and the assigned number(s):

AN EIGHT (8) COLOR HEIDELBERG CD SHEET-FED LITHOGRAPHIC PRESS WITH A COATING TOWER.

4. Federally Enforceable Limit on the Operating Schedule for this Emissions Unit:

General Reference:_____

Continuous Processes: 24 hours/day 365 days/year

Batch Processes: _____ hours/batch _____ batches/day

_____ days/year

5. Fuel Consumption:

	Type(s) of Fuel	% Sulfur	Annual Usage (specify units)
1.	N/A	N/A	N/A
2.			
3.			

6. Emissions in Tons:

A. Actual Major: _____ Potential Major: X (note: before control device)

B. Actual Emissions: NOx 0 SOx 0 VOC 3.12 CO 0 PM10 0 HAPs 0.053

SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: **EU-6** (NEW PRESS NO. 41) 1a. Date of installation (month/year): 2019 **(REPLACED IN-KIND EXISTING PRESS 41)**	2. MDE Registration No.:(if applicable) 6-3194

3. Detailed description of the emissions unit, including all emission point(s) and the assigned number(s):

A FORTY (40) INCH, EIGHT (8) COLOR SHEET-FED HEIDELBERG LITHOGRAPHIC PRESS WITH A COATING TOWER.

4. Federally Enforceable Limit on the Operating Schedule for this Emissions Unit:

General Reference:_____

Continuous Processes: 24 hours/day 365 days/year

Batch Processes: _____ hours/batch _____ batches/day

_____ days/year

5. Fuel Consumption:

	Type(s) of Fuel	% Sulfur	Annual Usage (specify units)
1.	N/A	N/A	N/A
2.			
3.			

6. Emissions in Tons:

A. Actual Major: _____ Potential Major X (note: before control device)

B. Actual Emissions: NOx 0 SOx 0 VOC 2.99 CO 0 PM10 0 HAPs 0051

SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: **EU-7** (PRESS NO. 46) **(REMOVED FROM SERVICE)** 1a. Date of installation (month/year): 11/2004	2. MDE Registration No.:(if applicable) 005-6-2818

3. Detailed description of the emissions unit, including all emission point(s) and the assigned number(s):

A SIX (6) COLOR, TWENTY- EIGHT (28) INCH HEIDELBERG SPEEDMASTER CD 74-6 SHEET-FED LITHOGRAPHIC PRESS

4. Federally Enforceable Limit on the Operating Schedule for this Emissions Unit:

General Reference:_____

Continuous Processes: 24 hours/day 365 days/year

Batch Processes: _____ hours/batch _____ batches/day

_____ days/year

5. Fuel Consumption:

	Type(s) of Fuel	% Sulfur	Annual Usage (specify units)
1.	N/A	N/A	N/A
2.			
3.			

6. Emissions in Tons:

A. Actual Major: _____ Potential Major: X (note: before control device)

B. Actual Emissions: NOx 0 SOx 0 VOC 0 CO 0 PM10 0 HAPs 0

SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: **EU-8** (PRESS NO. 40) 1a. Date of installation (month/year): 12/2006	2. MDE Registration No.:(if applicable) 05-6-1983

3. Detailed description of the emissions unit, including all emission point(s) and the assigned number(s):

ONE (1) 8-COLOR 29-INCH LITHOGRAPHIC PRINTING PRESS WITH AQUEOUS COATER AND UV INK & COATING CAPABILITY

4. Federally Enforceable Limit on the Operating Schedule for this Emissions Unit:

General Reference:_____

Continuous Processes: 24 hours/day 365 days/year

Batch Processes: _____ hours/batch _____ batches/day

_____ days/year

5. Fuel Consumption:

	Type(s) of Fuel	% Sulfur	Annual Usage (specify units)
1.	N/A	N/A	N/A
2.			
3.			

6. Emissions in Tons:

A. Actual Major: _____ Potential Major: X (note: before control device)

B Actual Emissions: NOx 0 SOx 0 VOC 2.82 CO 0 PM10 0 HAPs 0.048

SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: **EU-9 (Press #43)** 1a. Date of installation (month/year): 2000	2. MDE Registration No.:(if applicable) 09-6-2376

3. Detailed description of the emissions unit, including all emission point(s) and the assigned number(s):

TWO (2) COLOR JOHN WALTON LITHOGRAPHIC NON-HEAT SET WEB PRESS.

4. Federally Enforceable Limit on the Operating Schedule for this Emissions Unit:

General Reference:_____

Continuous Processes: 24 hours/day 365 days/year

Batch Processes: _____ hours/batch _____ batches/day

_____ days/year

5. Fuel Consumption:

	Type(s) of Fuel	% Sulfur	Annual Usage (specify units)
1.	N/A	N/A	N/A
2.			
3.			

6. Emissions in Tons:

A. Actual Major: _____ Potential Major: X (note: before control device)

B. Actual Emissions: NOx 0 SOx 0 VOC 0.43 CO 0 PM10 0 HAPs 0.007

SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: **EU-10 (Press # 44)** 1a. Date of installation (month/year): 6/1998	2. MDE Registration No.:(if applicable) 09-6-2377

3. Detailed description of the emissions unit, including all emission point(s) and the assigned number(s):

TWO (2) COLOR HEIDELBERG SHEET-FED LITHOGRAPHIC PRESS.

4. Federally Enforceable Limit on the Operating Schedule for this Emissions Unit:

General Reference:_____

Continuous Processes: 24 hours/day 365 days/year

Batch Processes: _____ hours/batch _____ batches/day

_____ days/year

5. Fuel Consumption:

	Type(s) of Fuel	% Sulfur	Annual Usage (specify units)
1.	N/A	N/A	N/A
2.			
3.			

6. Emissions in Tons:

A. Actual Major: _____ Potential Major: X (note: before control device)

B. Actual Emissions: NOx 0 SOx 0 VOC 1.46 CO 0 PM10 0 HAPs 0.025

SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: **EU-11 Press # 69** 1a. Date of installation (month/year): 2001	2. MDE Registration No.:(if applicable) 09-6-3017

3. Detailed description of the emissions unit, including all emission point(s) and the assigned number(s):

A TEN (10) COLOR, SIXTEEN (16) INCH MARK ANDY FLEXOGRAPHIC HEAT-SET WEB PRESS USING WATER-BASED AND UV INKS.

4. Federally Enforceable Limit on the Operating Schedule for this Emissions Unit:

General Reference:_____

Continuous Processes: 24 hours/day 365 days/year

Batch Processes: _____ hours/batch _____ batches/day

_____ days/year

5. Fuel Consumption:

	Type(s) of Fuel	% Sulfur	Annual Usage (specify units)
1.	N/A	N/A	N/A
2.			
3.			

6. Emissions in Tons:

A. Actual Major: _____ Potential Major: X (note: before control device)

B. Actual Emissions: NOx 0 SOx 0 VOC 2.54 CO 0 PM10 0 HAPs 0.0052

SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: **EU-12** (Press #66) 1a. Date of installation (month/year): 5/2005	2. MDE Registration No.:(if applicable) 05-6-2825

3. Detailed description of the emissions unit, including all emission point(s) and the assigned number(s):

A TEN (10) COLOR,SIXTEEN (16) INCH COMCO PRO-GLIDE FLEXOGRAPHIC HEAT-SET WEB PRESS USING WATER-BASED INKS.

4. Federally Enforceable Limit on the Operating Schedule for this Emissions Unit:

General Reference:_____

Continuous Processes: 24 hours/day 365 days/year

Batch Processes: _____ hours/batch _____ batches/day

_____ days/year

5. Fuel Consumption:

	Type(s) of Fuel	% Sulfur	Annual Usage (specify units)
1.	N/A	N/A	N/A
2.			
3.			

6. Emissions in Tons:

A. Actual Major: _____ Potential Major: X (note: before control device)

C. Actual Emissions: NOx 0 SOx 0 VOC 2.04 CO 0 PM10 0 HAPs 0.043

SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: **EU-13** (Press #68) 1a. Date of installation (month/year): 1/2008	2. MDE Registration No.:(if applicable) 6-2936

3. Detailed description of the emissions unit, including all emission point(s) and the assigned number(s):

ONE (1) MARK ANDY LP3000, 10-COLOR 13-INCH FLEXOGRAPHIC PRINTING PRESS EQUIPPED WITH A UV CURING SYSTEM ON ONE COLOR UNIT

4. Federally Enforceable Limit on the Operating Schedule for this Emissions Unit:

General Reference:_____

Continuous Processes: 24 hours/day 365 days/year

Batch Processes: _____ hours/batch _____ batches/day

_____ days/year

5. Fuel Consumption:

	Type(s) of Fuel	% Sulfur	Annual Usage (specify units)
1.	N/A	N/A	N/A
2.			
3.			

6. Emissions in Tons:

A. Actual Major: _____ Potential Major: X (note: before control device)

D. Actual Emissions: NOx 0 SOx 0 VOC 1.08 CO 0 PM10 0 HAPs 0.022

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SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: **EU-14 Press #70** 1a. Date of installation (month/year): 8/15	2. MDE Registration No.:(if applicable) 6-3123

3. Detailed description of the emissions unit, including all emission point(s) and the assigned number(s):

TEN (10) COLOR , SIXTEEN (16) INCH MARK ANDY FLEXOGRAPHIC HEAT-SET WEB PRESS USING WATER-BASED AND UV INKS

4. Federally Enforceable Limit on the Operating Schedule for this Emissions Unit:

General Reference:_____

Continuous Processes: 24_____hours/day 365_____days/year

Batch Processes: _____hours/batch _____batches/day

_____days/year

5. Fuel Consumption:

	Type(s) of Fuel	% Sulfur	Annual Usage (specify units)
1.	N/A	N/A	N/A
2.			
3.			

6. Emissions in Tons:

A. Actual Major:_____Potential Major:_____(note: before control device)

B. Actual Emissions: NOx_____SOx_____VOC 2.51___PM10_____HAPs 0.052

SECTION 3B. CITATION TO AND DESCRIPTION OF APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Emissions Unit No.: FACILITY WIDE **General Reference: PART 70 SEC IV (1)**

Briefly describe the Emission Standard/Limit or Operational Limitation:

A. Control of VOC Emissions (COMAR 26.11.19.16C & D)

The Permittee shall control VOC equipment leaks by the following work practices:

(1) Visually inspect all components on the premises for leaks at least once each calendar month;

(2) Tag any leak immediately with a date, identification number, and the name of the person who discovered the leak, The tag shall be made of a material that will withstand any weather or corrosive conditions to which it may be normally exposed. The tag shall remain in place until the leak has been repaired.

(3) Take immediate action to repair all observed VOC leaks that can be repaired within 48 hours;

(4) Repair all other leaking components not later than 15 days after the leak is discovered. If a replacement part is needed, the part shall be ordered within 3 days after discovery of the leak and the leak shall be repaired within 48 hours after receiving the part;

(5) Maintain a supply of components or component parts that are recognized by the source to wear or corrode, or that otherwise need to be routinely replaced, such as seals, gaskets, packing, and pipe fittings.

(6) Maintain a log that includes the name of the person conducting the inspection and the date on which leak inspections are made, the findings of the inspection, and a list of leaks by tag identification numbers. The log shall be made available to the Department upon request. Leak records shall be maintained for a period of not less than 2 years from the date of their occurrence.

Exceptions: Components that cannot be repaired as required in this regulation because they are inaccessible, or that cannot be repaired during operation of the source, shall be identified in a log and included within the source's maintenance schedule for repair during the next source shutdown; and

Permit Shield Request: __YES__

Compliance Demonstration:

Check appropriate reports required to be submitted:

- ☐ Quarterly Monitoring Report:_____
- ☐ Annual Compliance Certification:____X_____
- ☐ Semi-Annual Monitoring Report: _____

Methods used to demonstrate compliance:

Testing: Reference: N/A

Describe:

A. Control of VOC Emissions - None

Monitoring: Reference: COMAR 26.11.19.16

Describe:

A. Control of VOC Emissions

The Permittee uses closed containers to store press clean-up materials. At least monthly inspections are conducted to verify compliance with (1) the use of closed containers to store waste and other VOC containing materials and (2) to verify that good operating practices are being implemented. Logs of the results of the at least monthly inspections are maintained. The logs contain the results of the inspections, the date of the inspection, and the name of the person conducting the inspection. The logs are available for review upon request. A copy of the Permittee good operating practices are maintained on site. The Permittee was not requested to participate in any testing by the Department during the reporting year. This condition has no testing or reporting requirement

Record Keeping: Reference: COMAR 26.11.19.16

Describe:

A. Control of VOC Emissions

The Permittee maintains a log that includes the name of the person conducting the inspection and date on which leak inspections were made, the findings of the inspection, and a list of leaks by tag identification number and identity of components that cannot be repaired as required in the regulation because they are inaccessible, or that cannot be repaired during operation of the source. The log is made available to the Department upon request. Leak records are maintained for a period of not less than 2 years from the date of their occurrence. Components that cannot be repaired as required in this regulation because they are inaccessible, or that cannot be repaired during operation of the source, are identified in the log and included within the source's maintenance schedule for repair during the next source shutdown.

Reporting: Reference:

Describe:

A. Control of VOC Emissions - None

Frequency of submittal of the compliance demonstration: __ANNUAL____

SECTION 3B. CITATION TO AND DESCRIPTION OF APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Emissions Unit No.: EU-1 to EU-3: CHAMPLAIN CAVALIER ROTOGRAVURE PRINTING PRESS WITH TEC QUANTUM OXIDIZER AND ASSOCIATED EU-4 ONE (1) FORTY-ONE GALLON SOLVENT WASH TANK; EU-11 SIXTEEN (16) INCH COMCO HEAT-SET WEB TEN (10) COLOR PRESS USING WATER-BASED, EU-12 COMCO TEN (10) COLOR, SIXTEEN (16) INCH PRO-GLIDE FLEXOGRAPHIC PRESS USING WATER-BASED INKS, AND EU-13 ONE (1) MARK ANDY LP3000, 10-COLOR 13-INCH FLEXOGRAPHIC PRINTING PRESS EQUIPPED WITH A UV CURING SYSTEM ON ONE COLOR UNIT USING WATER-BASED INKS.

General Reference: Part 70 Sec IV Part (2)

Briefly describe the Emission Standard/Limit or Operational Limitation:

A. Control of Visible Emissions (COMAR 26.11.06.02A&C)

(1) "In Areas III and IV a person may not cause or permit the discharge of emissions form any installation or building, other than water in an uncombined form, which is visible to a human observer."

(2) Exceptions – " The visible emissions standards in §C of this regulation do not apply to emissions during start-up and process modification or adjustments, or occasional cleaning of control equipment, if:

1. The visible emission are not greater than 40 percent opacity; and
2. The visible emissions do not occur for more than 6 consecutive minutes in any sixty minute period."

B. Control of Particulate Matter (COMAR 26.11.06.03B(2) a

"A person may not cause or permit to be discharged into the outdoor atmosphere from any other installation, particulate matter in excess of 0.03gr/SCFD."

C. Control of VOC Emissions (COMAR 26.11.19.10 C)

Requirements for Sheet-Fed or Web-Fed Flexographic, Packing Rotogravure, and Publication Rotogravure Printing. A person who owns or operates a printing press that uses flexographic, packing rotogravure, or publication rotogravure methods and is a major stationary source as defined in Regulation .01B(4) of this chapter, shall:

(1) Reduce emissions by using water-based inks that contain less than 25 percent VOC by volume of volatile portion of the ink, of high solids inks that contain not less that 60 percent nonvolatile; or

(2) If compliance with the requirements of Sec. C(1) of this regulation cannot be achieved, reduce the VOC content of each ink, or reduce the average VOC content of inks used as each press as follows:

(a) 60 percent reduction for flexographic presses;

(b) 65 percent reduction for packaging rotogravure presses; and

(c) 75 percent reduction for publication rotogravure presses.

D. Operational Limitation (PTC 03-9-0159M)

The catalytic oxidizer shall be operated so that the measured temperature in the inlet gas stream is maintained at a temperature level of at least 600°F when the presses are operating. The flue gas from the rotogravure press shall exhaust through the catalytic oxidizer.

E. Control of Hazardous Air Pollutants (40 CFR Part 63 Subpart KK)

(a) The provisions of this subpart apply to :

(2) Each new and existing facility at which publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing presses are operated for which the owner or operator chooses to commit to, and meets the criteria of paragraphs (a)(2)(i) and (a) (2) (ii) of this section for purposes of establishing the facility to be an area source with respect to this subpart.

(i) Use less than 9.1 Mg (10 Tons) per each rolling 12-month period of each HAP at the facility, including materials used for source categories or purposes other than printing and publishing, and

(ii) Use less than 22.7 Mg (25Tons) per each rolling 12-month period of any combination of HAPs at the facility, including materials used for source categories or purposes other than printing and publishing.

(3) Each facility for which the owner or operator chooses to commit to and meets the criteria stated in paragraph (a)(2) of this section shall be considered an area source, and is subject only to the provisions of §63. 830(b)(1) of this subpart.

(4) Each facility for which the owner or operator commits to the conditions in paragraph (a) (2) of this section may exclude material used in routine janitorial or facility grounds maintenance , personal uses by employees or other persons, the use of products for the purposes of maintaining electric, propane, gasoline, and diesel powered motor vehicles operated by the facility, and the use of HAPs contained in intake water (used for processing or non contact cooling) or intake air (used either as compressed air or for combustion).

(5) Each facility for which the owner or operator commits to the conditions in paragraph (a) (2) of this section to become an area source, but subsequently exceeds either of the thresholds in paragraph (a) (2) of this section for any rolling 12- month period (without first obtaining and complying with other limits that keep its potential to emit below major source levels) , shall be considered in violation of its commitment for that 12-month period and shall be considered a major source of HAPs beginning the first month after the end of the 12-month period in which either of the HAP-use thresholds was exceeded. As a major source of HAPs, each such facility would be subject as noted in paragraph (a)(1) of this section and would no longer be eligible to use the provisions of paragraph (a)(2) of this section.

(6) An owner or operator of an affected source subject to paragraph (a)(2) of this section who chooses to no longer be subject to paragraph (a) (2) of this section shall notify the Administrator of such change. If, by no longer being subject to paragraph (a)(2) of this section, the facility at which the affected source is located becomes a major source:

(i) The owner or operator of an existing source must continue to comply with HAP-usage provisions of paragraph (a)(2) of this section until the source is in compliance with all relevant requirements for existing affected sources under this subpart;

(ii) The owner or operator of a new source must continue to comply with the HAP usage provisions of paragraph (a)(2) of this section until the source is in compliance with all relevant requirements for new affected sources under this subpart.

§ 63.822 (a) – For the purposes of this permit, a “month” means a calendar month or a pre-specified period of 28-35 days.

Permit Shield Request: _YES___

Compliance Demonstration:

Check appropriate reports required to be submitted:

- Quarterly Monitoring Report:_____
- Annual Compliance Certification:____X_____
- Semi-Annual Monitoring Report: _____

Methods used to demonstrate compliance:

Monitoring: Reference: COMAR 26.11.03.06C

Describe:

A. Control of Visible Emissions

The Permittee conducts quarterly one-minute visual observations of the catalytic oxidizer exhaust. The visual observations are conducted while the oxidizer and presses are in operation. If visible emission are observed during any quarterly visual observation, monthly observations of the exhaust are implemented and that schedule is maintained until no visible emissions are observed in six consecutive monthly observations. If visible emissions are observed during any observation the Permittee inspects the catalytic oxidizer for cause of the visible emissions and performs necessary adjustments or repairs prior to operating the presses. If visible emissions have not been eliminated, daily 12-minute observations are conducted in accordance with EPA Reference Method 9 when operating the presses and oxidizer.

B. Control of Particulate Matter

The Permittee maintains an operations manual and preventative maintenance plan and records of maintenance performed that relate to oxidizer performance.

C. Control of VOC Emissions

The Permittee continuously monitor the inlet temperature of the catalytic oxidizer to ensure that the inlet temperature is operating at or above 600°F. A preventative maintenance program has been developed and implemented for the oxidizer to insure that it is properly maintained and in good working order. Semi-annual catalyst tests are conducted to ensure that the catalysts activity is acceptable and the Permittee reconditions or replaces catalyst material as directed by the Department when the catalyst activity is determined to be insufficient.

D. Operational Limitation

The Permittee ensures that the catalytic oxidizer is properly operated and maintained by performing a semi-annual verification of the inlet temperature thermocouple's accuracy. The verification is conducted by using a second thermocouple to compare the relative accuracy of the permanent thermocouple.

The Permittee verifies at least once per week that the inlet temperature data is being successfully recorded and saved to the floppy disk in the new data recorder and the Permittee has installed a chart recorder as a data backup for the disk. This verification is performed by reviewing the data contained on the floppy disk for the past week to determine the reliability of the data.

E. Control of Hazardous Air Pollutants – None

Record Keeping: Reference: COMAR 26.11.03.06C

Describe:

The Permittee maintains the following records on-site for a period of five years and makes them available to the Department upon request.

A. Control of Visible Emissions (COMAR COMAR 26.11.03.06C)

The Permittee shall maintain a log of visible emission observations performed.

B. Control of Particulate Matter - None

C. Control of VOC Emissions

The Permittee shall maintain MSD Sheets or other manufacturer's certified product sheets for wach material used where the VOC content specified on MSDS or product sheets has been determined using EPA Reference Method 24 or an equivalent methodology approved by the Department.

D. Operational Limitation

The following records are kept on site :

(1) Permanent records for the life of the facility of pertinent design data for the control device including manufacturer specification and vendor guarantees for the control device and catalyst, catalyst requirements and design space velocity, operating limits, volume and configuration of catalyst required.

(2) Monthly records of the ink usage and the VOC content of the ink as determined by EPA Reference Method 24 analysis or equivalent;

(3) Maintenance records of types and dates of work performed in the catalytic oxidizer , including amounts of catalyst added and/or replaced, and records of manufacturers specifications and guarantees for the catalyst;

(4) Continuous recordings of the temperature of the gas stream entering the catalyst bed;

(5) The results of each catalyst analysis performed and an estimation of the activity level of the catalyst compared to fresh catalyst based in the results of the analysis;

(6) Material Safety Data Sheets of all inks used in this process;

(7) A log of each verification of inlet temperature data collection ;and

(8) A log of the verification of the inlet temperature thermocouple's accuracy.

E. Control of Hazardous Air Pollutants

(40 CFR §63.829(d)) - The owner or operator of each facility which commits to the criteria of § 63.820(a) (2) shall The Permittee maintains records of all required measurements and calculations needed to demonstrate compliance with these criteria, including the mass of all HAP containing materials used and the mass fraction of HAP present in each HAP containing material used, on a monthly basis.

(40 CFR §63.10(b)(2)(xiv) – The Permittee maintains records of all documentation supporting the initial notification [previously submitted by the facility pursuant to 40 CFR §63.820(b)(1)] and the notification of compliance status [previously submitted by the facility pursuant to 40 CFR §63.830(b)(3)].

(40 CFR §63.830(b)(3)) – The facility maintains records of each applicability determination performed by the facility in accordance with the requirements of 40 CFR §63.820(a).

Reporting: Reference: COMAR 26.11.03.06C

Describe:

A. Control of Visible Emissions

The Permittee reports incidents of visible emissions in accordance with permit conditions 4, Section III, "Report of Excess Emissions and Deviations."

B. Control of Particulate Matter – None

C. Control of VOC Emissions

The Permittee reports the quantity and identity of all VOC-containing materials that are used during a year in the annual emissions certification report.

D. Operational Limitation

The Permittee reports :

a. The results of the performance test within 60 days after the completion of the test; and
b. The results of the semi-annual catalyst sampling and testing to the Department within 10 working days after

results are received by the facility.

E. Control of Hazardous Air Pollutants (40 CFR §63. 830)

The Permittee submits the reports specified in paragraphs (b)(1) through (b)(6) of this section to the Administrator:

a) An initial notification required in §63. 9(b)
b) Initial notifications for existing sources shall be submitted no later than one year before the compliance date specified in §63. 826(a) .
c) Initial notification for new and reconstructed sources shall be submitted as required by §63. 9(b).
d) For the purposes of this subpart, a Title V or part 70 permit application may be used in lieu of the initial notification required under §63. 9(b), and the State to which the permit application has been submitted has an approved operating permit program under Part 70 of this chapter and has received delegation of authority from the EPA.
e) Permit applications shall be submitted by the same due dates as those specified for the initial notifications.

Frequency of submittal of the compliance demonstration: ___ANNUAL____

SECTION 3B. CITATION TO AND DESCRIPTION OF APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Emissions Unit No.: FLEXOGRAPHIC PRESSES (EU-11 THROUGH EU-13)

General Reference: Part 70 Sec IV Part (3)

Briefly describe the Emission Standard/Limit or Operational Limitation:

A. **Control of VOC Emissions (COMAR 26.11.19.10C)**
"A Person who owns or operates a printing press that uses flexographic, packaging rotogravure, or publication rotogravure methods and is a major stationary source as defined in Regulation .01B(4) of this chapter, shall:

(1) Reduce emissions by using water-based inks that contain less than 25% VOC by volume of volatile portion of the ink, or high solids inks that contain not less than 60% non-volatile components; or

(2) If compliance with the requirements of Sec. C(1) of this regulation cannot be achieved, reduce the VOC content of each ink, or reduce the average VOC content of the inks used at each press as follows:

a. 60 percent reduction for flexographic presses,
b. 65 percent reduction for packaging rotogravure presses, and
c. 75 percent reduction for publication rotogravure presses." **(NOT APPLICABLE)**

Permit Shield Request: ___YES___.

Compliance Demonstration:

Check appropriate reports required to be submitted:

- ☐ Quarterly Monitoring Report:_____
- ☐ Annual Compliance Certification:____X_____
- ☐ Semi-Annual Monitoring Report: _____

Methods used to demonstrate compliance:

Testing Reference : N/A
Describe:

A. Control of VOC Emissions - None

Monitoring: Reference N/A
Describe:

A. Control of VOC Emissions - None

Record Keeping: Reference : COMAR 26.11.03.06C
Describe:

A. Control of VOC Emissions

The Permittee:

(1) Maintains MSD sheets or other manufacturer's certified product sheets for each material used where the VOC content specified on the MSDS or product sheet has been determined based on EPA Reference Method 24 or equivalent methodology approved by the Department .

(2) Maintains records pertaining to the low solvent or high solids characteristics of the VOC materials used that are adequate to demonstrate that emissions are below the applicable threshold as stated in COMAR 26.11.19.03.06C(1)

Reporting: Reference : COMAR 26.11.03.06C
Describe:

A. Control of VOC Emissions

The Permittee reports the quantity and identity of all VOC-containing materials that are used during a year in the annual emissions certification report.

Frequency of submittal of the compliance demonstration: ___ANNUAL____

SECTION 3B. CITATION TO AND DESCRIPTION OF APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Emissions Unit No.: ALL SHEET-FED LITHOGRAPHIC PRESSES (EU-5 THROUGH EU-10)

General Reference: Part 70 SEC IV(4)

Briefly describe the Emission Standard/Limit or Operational Limitation:

A. Requirements for Sheet-Fed Letter of Lithographic Printing (COMAR 26.11.19.11C)

"A person may not operate a sheet-fed letter or lithographic printing press with a cylinder width 18 inches or greater unless:

1) The fountain solution is refrigerated to maintain a temperature of less than 55°F if isopropyl alcohol is used;
2) A temperature indicator is installed to monitor the fountain solution temperature if the solution is refrigerated;
3) The fountain solution contains less than 8.5 percent isopropyl alcohol by weight."

B. Requirements for Cleaning Printing Equipment. (COMAR 26.11.19.11E)

"A person who uses materials containing VOC to clean printing equipment shall:

1) Store all waste materials containing VOC, including cloth and paper, in closed containers;
2) Maintain lids on all VOC-containing cleanup materials when not in use;
3) Establish, in writing, good operating practices for persons who clean printing equipment to minimize use of VOC-containing materials, with these good operating practices being made available to the Department on requests; and
4) Upon request of the Department, participate in the evaluation of non-VOC and low-VOC materials used to clean printing equipment when these materials have the potential to be appropriate substitutes for currently used materials."

Permit Shield Request: __YES__

Compliance Demonstration:

Check appropriate reports required to be submitted:

- ☐ Quarterly Monitoring Report:_____
- ☐ Annual Compliance Certification:____X_____
- ☐ Semi-Annual Monitoring Report: _____

B. Requirements for Cleaning Printing Equipment. (COMAR 26.11.19.11E)

If a clean-up material study is requested by the Department , the facility will report all results to the Department as required.

Frequency of submittal of the compliance demonstration: ___Annual___

Methods used to demonstrate compliance:

Monitoring: Reference: COMAR 26.11.03.06C

Describe:

A. Requirements for Sheet-Fed Letter of Lithographic Printing (COMAR 26.11.19.11C)

The Permittee checks the fountain solution temperature sensors with a calibrated thermometer at least once every thirty days and records the data. All the presses using isopropyl alcohol are checked daily and the percent of isopropyl alcohol is recorded. Hydrometer reading are taken and recorded after the alcohol is added each time. The following records are kept 5 years: (1) monthly hours of operation and material use of each press (2) monthly amounts and composition of all fountain solutions including MSDS sheets, and (3) the required fountain solution temperature readings and hydrometer readings. All of the records should be made available to the Department.

B. Requirements for Cleaning Printing Equipment. (COMAR 26.11.19.11E)

The Permittee stores all VOC-containing wastes in closed containers and maintains lids on all VOC-containing materials when not in use. On a monthly basis, an inspection is conducted to verify compliance with the requirement to store waste and other materials that contain VOCs in closed containers and to maintain lids on VOC containing materials when they are not in use. Written good operating practices have been developed, are maintained on-site, and are available for individuals cleaning the presses and the Department to review.

Testing: Reference: COMAR 26.11.03.06C

Describe:

A. Requirements for Sheet-Fed Letter of Lithographic Printing (COMAR 26.11.19.11C)

The Permittee checks the fountain solution temperature sensors with a calibrated thermometer at least once every thirty days and records the data. All the presses using isopropyl alcohol are checked daily and the percent of isopropyl alcohol is recorded. Hydrometer reading are taken and recorded after the alcohol is added each time.

B. Requirements for Cleaning Printing Equipment. (COMAR 26.11.19.11E)

The Permittee performs tests when required as part of an evaluation requested by the Department of non-VOC and low VOC cleanup materials. No tests have been requested to date.

Record Keeping: Reference: COMAR 26.11.03.06C

Describe:

A. Requirements for Sheet-Fed Letter of Lithographic Printing (COMAR 26.11.19.11C)

The following records are kept by the Permittee for a period of 5 years: (1) Daily records of fountain solution temperature for fountain solution containing isopropyl alcohol; (2) Copies of the MSD Sheets or VOC data sheets that show the quantity of VOC in the inks and fountain solutions calculated using EPA Reference Method 24 or equivalent; and (3) Monthly records of hours of operation for each press and total material usage. All of the records should be made available to the Department.

B. Requirements for Cleaning Printing Equipment. (COMAR 26.11.19.11E)

Copies of the good operating practices manual are maintained along with logs of the results of the monthly inspections. The logs contain the results of the inspections, the date of the inspection, and the name of the person conducting the inspection. The logs are available for review upon request. No clean-up studies have been requested by the Department to date.

Reporting: Reference COMAR 26.11.03.06C

Describe:

A. Requirements for Sheet-Fed Letter of Lithographic Printing (COMAR 26.11.19.11C)

Quantities and the identity of all VOC-containing materials that are used during a year are reported in the Annual Emissions Certification Report which is submitted to the Department.

SECTION 3B. CITATION TO AND DESCRIPTION OF APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Emissions Unit No.: EU-10 JOHN WALTON 2 COLOR LITOGRAPHIC NON-HEAT SET WEB PRESS

General Reference: Part 70 Sec IV Part (3)

Briefly describe the Emission Standard/Limit or Operational Limitation:

A. Requirements for Lithographic Web Printing (COMAR 26.11.19.11D)

1) "A person who owns or operates a premises from which the actual VOC emissions from all lithographic web printing presses are 100pounds or more per day after January 1, 1990 shall operate the press only if the dryer exhaust is ducted to a control devices that is constructed, operated, and maintained to achieve an overall control efficiency of 90 percent or more; and
2) The Permittee may not use isopropyl alcohol in the fountain solution.

B. Requirements for Cleaning Printing Equipment. (COMAR 26.11.19.11E)

"A person who uses materials containing VOC to clean printing equipment shall:

1) Store all waste materials containing VOC, including cloth and paper, in closed containers;
2) Maintain lids on all VOC-containing cleanup materials when not in use;
3) Establish, in writing, good operating practices for persons who clean printing equipment to minimize use of VOC-containing materials, with these good operating practices being made available to the Department on requests; and
4) Upon request of the Department, participate in the evaluation of non-VOC and low-VOC materials used to clean printing equipment when these materials have the potential to be appropriate substitutes for currently used materials."

Permit Shield Request: ____YES_____

Compliance Demonstration:

Check appropriate reports required to be submitted:

- ☐ Quarterly Monitoring Report:_____
- ☐ Annual Compliance Certification:___X____
- ☐ Semi-Annual Monitoring Report: _____

Methods used to demonstrate compliance:

Monitoring: Reference COMAR 26.11.03.06C

Describe:

A. The Permittee reviews MSD Sheets for VOC content and calculates the daily VOC emissions from the web press. The calculations for each month are completed by the 15th of the following month. The daily VOC emissions are calculated by dividing the total VOC emissions by the days of operation.

B. The Permittee uses closed containers to store press clean-up materials. At least monthly inspections are conducted to verify compliance with (1) the use of closed containers to store waste and other VOC containing materials and (2) to verify that good operating practices are being implemented. Logs of the results of the at least monthly inspections are maintained. The logs contain the results of the inspections, the date of the inspection, and the name of the person conducting the inspection. The logs are available for review upon request. A copy of the Permittee good operating practices are maintained on site. The Permittee was not requested to participate in any testing by the Department during the reporting year.

Testing: Reference N/A

Describe:

A. Requirements for Lithographic Web Printing (COMAR 26.11.19.11D) – None

B. The Permittee performs tests when required as part of a evaluation requested by the Department of non-VOC and low-VOC clean up materials.

Record Keeping: Reference COMAR 26.11.03.06C

Describe:

A. The Permittee maintains records suitable to demonstrate that VOC emissions from the Lithographic Web Press do not exceed 100 pounds per day of actual emissions. These records include daily quantities of each material used on the press and current MSD Sheets and/or manufacturer specification sheets showing the VOC and the chemical composition of each ink, ink additive, coating, cleaning solvent or other material used.

B. Copies of the facility Good Operating Practices Manual, inspection records, and results of any clean-up studies requested by the Department are maintained at the site and are made available for review upon request.

Reporting: Reference COMAR 26.11.03.06C and Permit to Construct # 03-6-2377

Describe:

A. Quantities and the identity of all VOC-containing materials that are used during a year are reported in the Annual Emissions Certification Report which is submitted to the Department.

B. The Department did not request any clean-up material studies to be completed by the Permittee during this permit term.

Frequency of submittal of the compliance demonstration: __ANNUAL_____

SECTION 3B. CITATION TO AND DESCRIPTION OF APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

List permit to construct conditions which should be considered to be obsolete, extraneous, or environmentally insignificant.

Emissions Unit No.: **NOT APPLICABLE** Permit to Construct No. _____

Emissions Point No.	Date Permit Issued	Condition No.	Brief Description of Condition and Reason for Exclusion
.			

SECTION 3C. OBSOLETE, EXTRANEOUS, OR INSIGNIFICANT PERMIT CONDITIONS

List permit to construct conditions which should be considered to be obsolete, extraneous, or environmentally insignificant.

Emissions Unit No.: __NOT APPLICABLE_____ **Permit to Construct No.** _____

Emissions Point No.	Date Permit Issued	Condition No.	Brief Description of Condition and Reason for Exclusion

SECTION 3D. ALTERNATE OPERATING SCENARIOS

Emissions Unit No.: NOT APPLICABLE **Not Applicable**

Briefly describe any alternate operating scenarios. Assign a number to each scenario for identification purposes.

NOT APPLICABLE

Section 4
Control Equipment

SECTION 3E. CITATION TO AND DESCRIPTION OF APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS FOR AN ALTERNATE OPERATING SCENARIO

Scenario No.: __NOT APPLICABLE_____

Emissions Unit No.: _____ **General Reference:** _____

Briefly describe any applicable Emissions Standard/Limits/Operational Limitations:
NOT APPLICABLE_____

_____

_____

_____

_____

_____

Compliance Demonstration

Methods used to demonstrate compliance:

Monitoring: Reference _____ Describe: _____

_____

_____

_____

Testing: Reference _____ Describe: _____

_____

_____

_____

Record Keeping: Reference _____ Describe: _____

_____

_____

_____

Reporting: Reference _____ Describe: _____

_____

_____

_____

Frequency of submittal of the compliance demonstration: _____

SECTION 4. CONTROL EQUIPMENT

1. Associated Emissions Units No. : EU-1, EU-2, & EU-3 **(REMOVED FROM SERVICE)**	2. Emissions Point No.: 09-01591
3. Type and Description of Control Equipment:	
TEC QUANTUM 300 CATALYTIC OXIDIZER	

4. Pollutants Controlled:	Control Efficiency:
VOCs/TAPs	97.00 % (Overall)

5. Capture Efficiency: 84%

Section 5

Summary Sheet of Potential Emissions

SECTION 5. SUMMARY SHEET OF POTENTIAL EMISSIONS

List all applicable pollutants in tons per year (tpy) pertaining to this facility. The Emissions Unit No. should be consistent with numbers used in Section 3. Attach a copy of all calculations.

Pollutant	NOx	SOx	VOC	CO	PM
CAS Number					
Emissions Unit # 1	NOT APPLICABLE				
Emissions Unit # 2					
Emissions Unit # 3					
Emissions Unit # 4					
Emissions Unit # 5					
Emissions Unit # 6					
Emissions Unit # 7					
Emissions Unit # 8					
Emissions Unit # 9					
Emissions Unit # 10					
Emissions Unit # 11					
Emissions Unit # 12					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Fugitive Emissions					
Total					

Section 6

An Explanation of Proposed Exemptions from Otherwise Applicable Federally Enforceable Requirements

SECTION 6. EXPLANATION OF PROPOSED EXEMPTIONS FROM OTHERWISE APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Describe and cite the applicable requirements to be exempted. Complete this Section only if the facility is claiming exemptions from or the non-applicability of any federally enforceable requirements.

1. Applicable Requirement:

NOT APPLICABLE

2. Brief Description:

_____

_____

_____

3. Reasons for Proposed Exemption or Justification of Non-applicability:

_____

_____

_____

_____

_____

Section 7

Compliance Schedule for Noncomplying Emissions Units

SECTION 7. COMPLIANCE SCHEDULE FOR NONCOMPLYING EMISSIONS UNITS

1. Emissions Unit #	Anticipated Compliance Date
NOT APPLICABLE	
Applicable Federally Enforceable Requirement being Violated:	

2. Description of Plan to Achieve Compliance:

NOT APPLICABLE_____

_____

_____

_____

_____

_____

Certified Progress Reports for sources in noncompliance shall be submitted at least quarterly to the Department.

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STATE-ONLY ENFORCEABLE REQUIREMENTS

Facility Information:

Name of Facility: GAMSE LITHOGRAPHING COMPANY, INC.	County BALTIMORE
Premises Number:	
Street Address: 7413 PULASKI HIGHWAY	
24-hour Emergency Telephone Number for Air Pollution Matters: MATTHEW HAYNES (410) 866-4700	
Type of Equipment (List Significant Units): One (1) rotogravure press equipped with a TEC Quantum catalytic oxidizer, a 41 gallon solvent wash tank, three (3) 8-color and one (1) 6-color sheet - fed lithographic presses with coating towers, two (2) 2-color sheet-fed lithographic presses, and three (3) flexographic heat-set web press using water-based inks.	
(NOT APPLICABLE – PREES& OXIDIZER REMOVED FROM FACILITY)	

CITATION TO AND DESCRIPTION OF APPLICABLE STATE-ONLY ENFORCEABLE REQUIREMENTS

Registration No.: All REGISTRATION NUMBERS
Emissions Unit No.: FACILITY-WIDE General Reference: Part 70 Sec VI Part (1)

Briefly describe the Emission Standard/Limit or Operational Limitation:

COMAR 26.11.06.08 and COMAR 26.11.06.09 which generally prohibits the discharge of emissions beyond the property line in such a manner that a nuisance or air pollution is created.

COMAR 26.11.15.05-which requires the installation and operation of T-BACT for new installations or sources discharging toxic air pollution to the atmosphere.

COMAR 26.11.15.06-which prohibits the discharge of toxic air pollutants to the extent that the emissions will unreasonably endanger human health.

Operating Conditions:
The Permittee shall comply with the requirements stated in COMAR 26.11.19.02I & COMAR 26.11.19.11E, use low solvent inks, and shall not use isopropyl alcohol in the fountain solution s in order to satisfy T-BACT requirement of COMAR 26.11.15.05

Permit Shield Request: _YES___

Methods used to demonstrate compliance:

Record Keeping and Reporting Reference:
Description:

The Permittee submits a written certification of the results of an analysis of emissions of Toxic Air Pollutants from the Permittee's facility by April 1 for each year of this permit term for the previous calendar year. The analysis includes either:

(1) A statement that previously submitted compliance demonstrations for emissions of toxic air pollutants remain valid; or
(2) A revise compliance demonstration, developed in accordance with requirements included under COMAR 26.11.15& 16, that accounts for changes in operations , analytical methods, emissions determinations, or other factors that have invalidated previous demonstrations.

Section 8 - Attachments

Checklist of Insignificant Activities

MARYLAND DEPARTMENT OF THE ENVIRONMENT
AIR AND RADIATION ADMINISTRATION
RENEWAL TITLE V APPLICATION INSIGNIFICANT ACTIVITIES LIST

III. Check-off List of Emissions Units and Activities Exempt from the Part 70 Permit Application

Insignificant Activities

Place a check mark beside each type of emissions unit or activity that is located at the facility. Where noted, please indicate the number of that type of emissions unit or activity located at the facility.

(1) No. ___ Fuel burning equipment using gaseous fuels or no. 1 or no. 2 fuel oil, and having a heat input less than 1,000,000 Btu (1.06 gigajoules) per hour;

(2) No. ___ Fuel-burning equipment using solid fuel and having a heat input of less than 350,000 Btu (0.37 gigajoule) per hour;

(3) No. ___ Stationary internal combustion engines with less than 500 brake horsepower (373 kilowatts)of power output

(4) __X__ Space heaters utilizing direct heat transfer and used solely for comfort heat;

(5) __X__ Water cooling towers and water cooling ponds unless used for evaporative cooling of water from barometric jets or barometric condensers, or used in conjunction with an installation requiring a permit to operate;

(6) No. __10__ Unheated VOC dispensing containers or unheated VOC rinsing containers of 60 gallons (227 liters) capacity or less;

(7) ____ Commercial bakery ovens with a rated heat input capacity of less than 2,000,000 Btu per hour;

(8) ___ Kilns used for firing ceramic ware, heated exclusively by natural gas, liquefied petroleum gas, electricity, or any combination of these;

(9) ____ Confection cookers where the products are edible and intended for human consumption;

(10) ____ Die casting machines;

(11)____ Photographic process equipment used to reproduce an image upon sensitized material through the use of radiant energy;

(12)____ Equipment for drilling, carving, cutting, routing, turning, sawing, planing, spindle sanding, or disc sanding of wood or wood products;

(13) ___ Brazing, soldering, or welding equipment, and cutting torches related to manufacturing and construction activities that emit HAP metals and not directly related to plant maintenance, upkeep and repair or maintenance shop activities;

(14) ___ Equipment for washing or drying products fabricated from metal or glass, provided that no VOC is used in the process and that no oil or solid fuel is burned;

(15) ___ Containers, reservoirs, or tanks used exclusively for electrolytic plating work, or electrolytic polishing, or electrolytic stripping of brass, bronze, cadmium, copper, iron, lead, nickel, tin, zinc, and precious metals;

(16) Containers, reservoirs, or tanks used exclusively for:

(a) ___ Dipping operations for applying coatings of natural or synthetic resins that contain no VOC;

(b) ___ Dipping operations for coating objects with oils, waxes, or greases, and where no VOC is used;

(c) ___ Storage of butane, propane, or liquefied petroleum, or natural gas;

(d) No. **X** Storage of lubricating oils:

(e) No. ___ Unheated storage of VOC with an initial boiling point of 300 °F (

(f) No. ___ Storage of Numbers 1, 2, 4, 5, and 6 fuel oil and aviation jet engine fuel,

(g) No. ___ Storage of motor vehicle gasoline and having individual tank capacities of 2,000 gallons (7.6 cubic meters) or less;

(h) No. **50** The storage of VOC normally used as solvents, diluents, thinners, inks, colorants, paints, lacquers, enamels, varnishes, liquid resins, or other surface coatings and having individual capacities of 2,000 gallons (7.6 cubic meters) or less;

(17) ___ Gaseous fuel-fired or electrically heated furnaces for heat treating glass or metals, the use of which does not involve molten materials;

(18) Crucible furnaces, pot furnaces, or induction furnaces, with individual capacities of 1,000 pounds (454 kilograms) or less each, in which no sweating or distilling is conducted, or any fluxing is conducted using chloride, fluoride,

or ammonium compounds, and from which only the following metals are poured or in which only the following metals are held in a molten state:

(a) ___ Aluminum or any alloy containing over 50 percent aluminum, if no gaseous chloride compounds, chlorine, aluminum chloride, or aluminum fluoride is used;

(b) ___ Magnesium or any alloy containing over 50 percent magnesium;

(c) ___ Lead or any alloy containing over 50 percent lead;

(d) ___ Tin or any alloy containing over 50 percent tin;

(e) ___ Zinc or any alloy containing over 50 percent zinc;

(f) ___ Copper;

(g) ____ Precious metals;

(19) ____ Charbroilers and pit barbecues as defined in COMAR 26.11.18.01 with a total cooking area of 5 square feet (0.46 square meter) or less;

(20) ___ First aid and emergency medical care provided at the facility, including related activities such as sterilization and medicine preparation used in support of a manufacturing or production process;

(21) ____ Certain recreational equipment and activities, such as fireplaces, barbecue pits and cookers, fireworks displays, and kerosene fuel use;

(22) ___ Potable water treatment equipment, not including air stripping equipment;

(23) ___ Firing and testing of military weapons and explosives;

(24) ___ Emissions resulting from the use of explosives for blasting at quarrying operations and from the required disposal of boxes used to ship the explosive;

(25) ____ Comfort air conditioning subject to requirements of Title VI of the Clean Air Act;

(26) ____ Grain, metal, or mineral extrusion presses;

(27) ____ Breweries with an annual beer production less than 60,000 barrels;

(28)___ Natural draft hoods or natural draft ventilators that exhaust air pollutants into the ambient air from manufacturing/industrial or commercial processes;

(29)____ Laboratory fume hoods and vents;

(30) No. ___ Sheet-fed letter or lithographic printing press(es) with a cylinder width of less than 18 inches;

For the following, attach additional pages as necessary:

(31) any other emissions unit, not listed in this section, with a potential to emit less than the "de minimus" levels listed in COMAR 26.11.02.10X (list and describe units):

No. ___ _____

No. ___ _____

No. ___ _____

No. ___ _____

No. ___ _____

(32) any other emissions unit at the facility which is not subject to an applicable requirement of the Clean Air Act (list and describe):

No. ___ _____

No. ___ _____

No. ___ _____