PIMA COUNTY DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR PROGRAM

33 N. Stone Ave, Suite 700 • Tucson, Arizona 85701 • Phone: (520) 724-7400

AIR QUALITY PERMIT

(As required by Title 17.12, Article II, Pima County Code)

ISSUED TO

POLY PRINT, INC.
2300 W. WETMORE ROAD
TUCSON, AZ 85705

This air quality permit does not relieve applicant of responsibility for meeting all air pollution regulations

THIS PERMIT ISSUED SUBJECT TO THE SPECIFIC CONDITIONS IDENTIFIED IN THIS PERMIT.

PDEQ PERMIT NUMBER **671** PERMIT CLASS **III**

ISSUED: **May 10, 2016** EXPIRES: **May 09, 2021**

Rupesh Patel, Air Permit Manger, PDEQ

SIGNATURE TITLE

Summary

This air quality permit is a renewal of the 5-year, individual permit issued to Poly Print, Inc., the Permittee, for its decorative plastic film printing process located at 2300 W Wetmore Road, Tucson, Arizona.

Poly Print Inc. is a specialty printing plant that makes custom prints on plastic film to produce labeling media, many of which are designed to contain food products (SIC Code 2671). The facility utilizes a 10 color Uteco flexographic printing press and a 6 color Sirio printing press for printing. The 10 color Uteco press handles the majority of the printing operations. The presses are equipped with accessory equipment including treaters and dryers. A Uteco laminator and a Nordmeccanica laminator support the production operation.

Inks and solvents are used in the printing presses and emit volatile organic compounds (VOCs) and hazardous air pollutants (HAPs) during printing and drying operations. The printing lines are housed in a room which has been designed to be a permanent total enclosure in order to guarantee an emissions collection efficiency of 100%. All emissions from the printing lines are routed to a thermal regenerative oxidizer (RTO). The facility proposes to voluntarily limit volatile organic compound emissions to 90 tons/year on a 12 month rolling total basis.

The presses have a corona treating unit that generates ozone for treating the surface of certain types of materials for the printing process. Ozone emissions form the Corona treatment unit will exhaust directly into the atmosphere. The Uteco laminator is capable of using water-based adhesives for the lamination process as well as solvent-based adhesives. Nordmeccanica laminator is a solvent free laminator which does not emit VOCs

Poly Print is a synthetic minor for VOCs and a true minor source for all other pollutants.

The Potential to Emit (PTE) of the facility is based on operation 24 hours/day 365 days per year. The following emission rates are for reference purposes only and are not intended to be enforced by direct measurement unless otherwise noted in the Specific Conditions of this permit.

Pollutant	**Emissions (tons/yr)**		
	VOCs	**HAPs**	**Ozone**
Uncontrolled Potential To Emit	246.00	0.14	14.39
Allowable Emissions	90.00	22.50	No Limitation
Actual Controlled Emissions (yr 2015)	24.60	0.14	No Limitation

The annual allowable emission limits apply to any 12-consectutive calendar month period. The emission limitations are held at 90% of major source threshold.

All terms and conditions of this permit that are federally enforceable or material permit conditions are specifically indicated as such.

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Section 1

General Conditions

I. Statutory Authority

The General, Specific and Standard Conditions contained in this air quality permit apply to the operations, equipment, and sources provided in the permit application and shall not relieve the Permittee or its subcontractors from compliance with all local, county, state, and federal laws, statutes, and codes or from obtaining permits for other operations or activities when required. [PCC 17.12.010.D & PCC 17.12.165]

II. Permitted Facility Sources

The following general provisions apply to facility-wide operations and to all sources of air contaminants operating at the facility: general control standards, materials handling standards, odor limiting standard, opacity standard, visibility limiting standard.

[PCC 17.16.010.A, PCC 17.16.020 thru 120, PCC 17.16.400.A, & PCC 17.16.430.F]

[Locally Enforceable Conditions]

III. Emission Limits and Standards

A. General Control Standards

1. The Permittee shall not cause or permit the planning, construction, installation, erection, modification, use or operation of an emission source which will cause or contribute to a violation of a performance standard in Title 17 of the Pima County Code. [PCC 17.12.020 & PCC 17.16.020.A]

2. The Permittee shall keep complete records of the materials used as fuel for any stationary or portable source of air pollution which burns any material except natural gas. [PCC 17.16.010.C]

3. Where a stack, vent or other outlet is at such a level that fumes, gas mist, odor, smoke, vapor or any combination thereof constituting air pollution are discharged to adjoining property, the Control Officer may require the installation of abatement equipment or the alteration of such stack, vent or other outlet by the owner or operator thereof to a degree that will adequately reduce or eliminate the discharge of air pollution to adjoining property. [PCC 17.16.020.B]

B. Materials Handling Standards

1. The Permittee shall not transport or store VOC's without taking necessary and feasible measures to control evaporation, leakage, or other discharge into the atmosphere. [PCC 17.16.400.A]

2. Materials including solvents or other volatile compounds, paints, acids, alkalies, pesticides, fertilizers and manure shall be processed, stored, used and transported in such a manner and by such means that they will not evaporate, leak, escape or be otherwise discharged into the ambient air so as to cause or contribute to air pollution. Where means are available to reduce effectively the contribution to air pollution from evaporation, leakage or discharge, the installation and use of such control methods, devices, or equipment shall be mandatory. [PCC 17.16.430.F]

C. Odor Limiting Standard

The Permittee shall not emit gaseous or odorous materials from equipment, operations or premises under his control in such quantities or concentrations as to cause air pollution. [PCC 17.16.430.D]

D. Opacity Limit

Except as otherwise specified in the Specific Conditions of this permit, the opacity of all plumes and effluents from all point, non-point, or fugitive emission sources shall not exceed 20% as determined by EPA Reference Method 9, Appendix A, 40 CFR Part 60.

[PCC 17.16.040, PCC 17.16.050.B, & PCC 17.16.130.B.1]

[This condition is Federally Enforceable when opacity is above 40%]

1. Opacities (optical densities), as measured in accordance with Method 9, of an effluent shall be measured by a certified visible emissions evaluator with his natural eyes, approximately following the procedures which were used during his certification, or by an approved and precisely calibrated in-stack monitoring instrument. [PCC 17.16.040.A.1]

2. A violation of an opacity standard shall be determined by measuring and recording a set of consecutive, instantaneous opacities, and calculating the arithmetic average of the measurements within the set unless otherwise noted in this permit. The measurements shall be made at approximately fifteen-second intervals for a period of at least six minutes, and the number of required measurements shall be as specified in Section 4. Sets need not be consecutive in time, and in no case shall two sets overlap. If the average opacity of the set of instantaneous measurements exceeds the maximum allowed by any rule, this shall constitute a violation. [PCC 17.16.040.A.2]

3. The use of air or other gaseous diluents solely for the purpose of achieving compliance with an opacity standard is prohibited. [PCC 17.16.040.A.3]

4. When the presence of uncombined water is the only reason for failure of a source to otherwise meet the requirements of III.D and III.E of this Section, III.D and III.E of this Section shall not apply. [PCC 17.16.040.B]

E. Visibility Limiting Standard [PCC 17.16.050]

1. The Permittee shall not cause, suffer, allow or permit operations or activities likely to result in excessive amounts of airborne dust without taking reasonable precautions to prevent excessive amounts of particulate matter from becoming airborne.

2. The Permittee shall not cause, suffer, allow, or permit diffusion of visible emissions, including fugitive dust, beyond the property boundary line within which the emissions become airborne, without taking reasonably necessary and feasible precautions to control generation of airborne particulate matter. Sources may be required to cease temporarily the activity or operation which is causing or contributing to the emissions until reasonably necessary and feasible precautions are taken.

    a. III.E.2 of this Section shall not apply when wind speeds exceed twenty-five (25) miles per hour (using the Beaufort Scale of Wind-Speed Equivalents, or as recorded by the National Weather Service). This exception does not apply if control measures have not been taken or were not commensurate with the size or scope of the emission source.

    b. III.E.2 of this Section shall not apply to the generation of airborne particulate matter from undisturbed land.

IV. Monitoring Requirements [PCC 17.12.185.A.3]

Except as otherwise contained in the Specific Conditions of this permit, monitoring for compliance with the facility-wide standards in III.A through E of this Section shall not be necessary. The Control Officer may ask the Permittee to conduct additional monitoring if the Control Officer has reasonable cause to believe a violation of the standards has been committed.

V. Recordkeeping Requirements

For the purpose of this provision, monitoring information shall also include emissions checks, observations, and inspections required by the Specific Conditions of this permit and, as applicable, descriptions of the particular piece of equipment, process, or area being monitored. [PCC 17.12.185.A.4]

A. Record Retention

All records required by this permit shall be retained for at least five years. [PCC 17.12.185.4.b]

B. Recordkeeping for Compliance Determinations

The Permittee shall retain a copy of the permit onsite including all required monitoring records and support information for review by the Control Officer. In addition, all equipment identified in the permit equipment list shall be marked with a unique, clearly visible, and accessible ID to identify the piece of equipment. The Permittee shall be considered in compliance by demonstrating that sufficient information on the equipment and facility operations is periodically collected, recorded, and maintained to assure that the compliance status of any specific condition of this permit can be readily ascertained at any time. [PCC 17.12.080, & PCC 17.24.020.A]

VI. Reporting Requirements [PCC 17.12.185.A.5]

A. Excess Emissions Reporting

The Permittee shall report to the Control Officer any emissions in excess of the limits established by this permit. The report shall be in 2 parts as specified below: [PCC 17.12.185.A.5 and PCC 17.12.040]

1 Notification by telephone or facsimile within 24 hours of the time the Permittee first learned of the occurrence of excess emission that includes all available information pursuant to PCC 17.12.040.B. To report excess emissions call **520-724-7400** or fax to **520-838-7432**.

2. Detailed written notification by submission of an excess emissions report within 72 hours of the notification in I.B.1 above. Send to **PDEQ 33 N. Stone Ave, Ste 700, Tucson, Arizona 85701**.

B. Emissions Inventory Reporting: [PCC 17.12.320]

When requested, the Permittee shall complete and submit to the Control Officer, an annual emissions inventory questionnaire.

C. Certification of Truth Accuracy and Completeness [PCC 17.12.165.I]

All reports required by this permit shall contain certification by a responsible official of truth, accuracy and completeness.

VII. Facility Changes

A. Before installing additional units, removing units, modifying existing emission equipment or switching fuels, the Permittee shall apply for the appropriate revision pursuant to PCC 17.12.235, PCC 17.12.255 or PCC 17.12.260. [PCC 17.12.180.A.2]

B. For facility changes that do not require revision, the Permittee may make the changes if written notice is provided to the Control Officer in advance of the changes in accordance with PCC 17.12.140.C. [PCC 17.12.240.C]

C. The Permittee shall maintain a log of other facility changes that do not require revision or notice in accordance with PCC 17.12.240.B. [PCC 17.12.240.B]

VIII. Testing Requirements [PCC 17.12.045, PCC 17.12.050 & PCC 17.20.010]

For purposes of demonstrating compliance, these test methods shall be used, provided that for the purpose of establishing whether or not the facility has violated or is in violation of any provision of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether a source would have been in compliance with applicable federal requirements if the appropriate performance or compliance procedures or methods had been performed.

The test methods referenced below are from 40 CFR Part 60, Appendix A unless otherwise noted:

A. When required, EPA Test Method 9 shall be used to monitor compliance with the opacity standards identified in this Permit.

B. The Permittee may submit an alternate and equivalent test method(s) that is listed in 40 CFR Subpart 60, Appendix A, to the Control Officer in a test plan, for approval by the Control Officer. [PCC 17.12.045.D]

C. Except as provided in this Section, should the Permittee desire to test or be required to test to demonstrate compliance with the standards contained in this permit, the Permittee shall contact the Control Officer for test methods and guidelines.

IX. Severability Clause [PCC 17.12.185.A.6]

The provisions of this permit are severable. If any provision of this permit is held invalid, the remainder of this permit shall not be affected thereby.

X. Permit Revision, Reopening, Revocation and Reissuance, or Termination for Cause [PCC 17.12.185.A.7.c]

The permit may be revised, reopened, revoked and reissued, or terminated for cause pursuant to PCC 17.12.270. The filing of a request by the Permittee for a permit revision, revocation and reissuance, or termination; or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

XI. Duty to Provide Information

[PCC 17.12.165.G and PCC 17.12.185.A.7.e]

A. The Permittee shall furnish to the Control Officer, within a reasonable time, any information that the Control Officer may request in writing to determine whether cause exists for revising, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the Permittee shall also furnish to the Control Officer copies of records required to be kept by the permit. For information claimed to be confidential, the Permittee shall furnish a copy of such records to the Control Officer along with a claim of confidentiality.

B. If the Permittee has failed to submit any relevant facts or if the Permittee has submitted incorrect information in the permit application, the Permittee shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information.

C. The Permittee shall pay fees to the Control Officer pursuant to PCC 17.12.520.

[PCC 17.12.185.A.9 & PCC 17.12.520]

Section 2

Specific Conditions

I. Emission Limitation

The Permittee shall limit VOC emissions from its printing operations and facility to a maximum of 90 Tons per year, calculated as a 12 month rolling total. [PCC 17.12.190.B]

[Federally Enforceable Condition]

II. Monitoring and Recordkeeping Requirements [PCC 17.12.180.A.3 and 4]

A. Flexographic Printing Process

1. The Permittee shall maintain on site a Manufacturer's Product Information Sheet (Material Safety Data Sheet or its equivalent) for each VOC containing product shipped to the facility and used in the printing and operations process.

   a. The Product Information Sheet must contain sufficient information to allow the Permittee to determine the weight or density of each product and the amount (in weight percent) and chemical abstract service (CAS) number of each volatile organic compound contained in each product.

   b. Where the Product Information Sheet contains content information of a product's constituent in terms of a range of values (e.g., 40% to 60 %), the Permittee shall assume the content of the constituent to be the highest value of the range.

2. The Permittee shall monitor and record the following information, and maintain this information for a period of five years:

   a. The amount of each product used each month (Monthly Usage).

      This may be calculated by adding, to the inventory for each product from the previous month, the amount received during the month, and subtracting from this total, the final inventory of the current month. The resulting difference will be the consumption for that month, the monthly usage. Adjustments may be made to the current month's inventory to allow for the offsite recycling of opened containers and factory return of factory sealed containers. The products to be monitored shall include, but will not be limited to, all solvents, diluents, inks, adhesives and cleaning agents that contain VOCs used in the operations of the printing process.

   b. The amount of VOC emissions for each month.

      The monthly usage for each product, multiplied by the maximum VOC content (percent by weight taken from the Product Information Sheets described in II.A.1.b of this section), for each VOC-containing part, summed over all the VOC containing parts used during the calendar month will be recorded as the monthly VOC Emissions. The result will be a weight, in Tons, of VOC emissions for that month.

c. The twelve-month rolling total VOC emissions

12-month rolling totals shall be calculated by adding the current month's VOC Emission to the sum of the previous eleven consecutive months' emissions.

3. The information required in II A.2.a, b and c of this section for each calendar month shall be completed and recorded by the eleventh calendar day of the following month.

B. Thermal Oxidizer Operating Requirements

The Permittee must operate and maintain the thermal regenerative oxidizer (RTO) as follows:

1. The operating temperature set point for the RTO must be maintained at a minimum of 1500º F.

2. The RTO must be equipped with an audible temperature alarm. The alarm must activate when the oxidizer's operating temperature falls to 100 or more degrees Fahrenheit below the set point temperature of condition II.B.1 of this section.

3. While either of the associated printing lines are operating, if the operating temperature of the RTO drops to 100 degrees Fahrenheit or more below the minimum set point temperature for a period of 30 consecutive minutes or more, the Permittee must take action to return the temperature to the established operating range in a quick and efficient way. The Permittee must document all events in which the minimum RTO temperature is not returned to 1500 F in any consecutive 30 consecutive minute period in an upset condition log. Each event must be evaluated and documented in accordance with VI.A of Section 1 of this permit. The following are not considered violations of the permit:

   a. Periods of thermal oxidizer operation below the established minimum operating temperature that are less than 30 consecutive minutes.

   b. Continual operation of the permitted equipment (printing lines) when the RTO is shutdown for maintenance or for unforeseen RTO breakdowns.

C. Emissions Prevention Practices

In order to qualify the actual emissions from the source, the Permittee must maintain the room enclosing the printing lines to EPA Method 204 as follows:

1. The printing room shall maintain 5-point criteria for permanent total enclosures according to the following: [EPA-452/F-03-033, Test Method 204, PCC 17.12.350]

[Material Permit Condition]

   a. The natural draft openings (NDO's) or web slots are at least four equivalent diameters from the nearest VOC source.

   b. The total area of the NDO's is less than 5% of the total surface area of the permanent total enclosure.

   c. The enclosure containing the VOC is maintained at a negative static pressure of at least 0.007 inches of water or has a negative inflow of at least 200 ft/min.

   d. All doors to the enclosure are normally closed.

   e. All exhausts from the enclosure are vented to the RTO.

III. Reporting Requirements [PCC 17.12.180.A.5 & PCC 17.12.210]

Non Additional. Reporting shall be in accordance with condition VI of Section 1 of this Permit.

IV. Testing Requirements [PCC 17.12.050]

Non Additional. Testing requirements shall be in accordance with condition VIII of Section 1 of this Permit.

Section 3

Applicable Regulations

Requirements Specifically Identified as Applicable

Compliance with the terms contained in this permit shall be deemed compliance with the following federally applicable requirements in effect on the date of permit issuance:

Code of Federal Regulations (CFR)

None Applicable

Pima County Code (PCC) Title 17, Chapter 17.12 Permits and Permit Revisions

17.12.010	Statutory authority
17.12.020	Planning, constructing, or operating without a permit
17.12.040	Reporting requirements
17.12.045	Test methods and procedures
17.12.050	Performance tests
17.12.080	Permit display or posting
17.12.165	Permit application processing procedures for Class II and Class III permits
17.12.185	Permit contents for Class II permits
17.12.520	Fees related to Class II permits

Pima County Code (PCC) Title 17, Chapter 17.16 Emission Limiting Standards

17.16.010	Local rules and standards - Applicability of more than one standard
17.16.020	Noncompliance with applicable standards
17.16.040	Standards and applicability (Includes NESHAP)
17.16.050	Visibility limiting standard
17.16.165	Standards of performance for fossil-fuel fired industrial and commercial equipment
17.16.430	Standards of performance for unclassified sources
17.16.430.D	Odor limiting standards

The following Code of Federal regulations (CFR) are not applicable to the facility. (See TSD for detailed applicability review).

40 CFR 63 Subpart KK - National Emission Standards for the Printing and Publishing Industry. (Major and Area Source requirements)

40 CFR Part 63 Subpart JJJJ -National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating.

Section 4

Equipment List

Table A: List of Permitted Equipment

NUMBER	EQUIPMENT NAME	TYPE	MODEL	SERIAL NUMBER	SIZE/CAPACITY
1	Sirio Press	Six Color CI	Sirio 34 inch wide	1303	34 inch
2	Uteco Press	Ten Color CI	Emerald 130	1953	52 inch
3	Regenerative Thermal Oxidizer	Ship & Shore Environmental	SSE-12K-90X-RTO	2012-379-1212	12, 000 SCFM

Table B: List of other Non-Permitted Equipment

PLANT ID #	EQUIPMENT NAME	MODEL	FUEL TYPE	SERIAL NUMBER	CAPACITY
3	Uteco Laminator (New)	Horizon D/ TH, Model 130	Natural Gas	1959	53 inch
4	Nordmeccanica	Super Simplex SL 1300	Electric	2068	51 inch
NA	Schiavi/ Maxon. Itas Press Dryer	50 RAH	Natural Gas	921256	2300 cfm (inlet fan) 2910 cfm (exhaust fan)
	Plate Cleaner				
1303-IB-1	Schiavi In-Between Dryers	NA	Natural Gas	NA	2625 cfm (inlet fan) 3210 cfm (exhaust Fan)
1303-IB-2	Schiavi In-Between Dryers	NA	Natural Gas	NA	2625 cfm (inlet fan) 3210 cfm (exhaust Fan)
1303-IB-3	Schiavi In-Between Dryers	NA	Natural Gas	NA	2625 cfm (inlet fan) 3210 cfm (exhaust Fan)
1303-IB-4	Schiavi In-Between Dryers	NA	Natural Gas	NA	2625 cfm (inlet fan) 3210 cfm (exhaust Fan)
1303-IB-5	Schiavi In-Between Dryers	NA	Natural Gas	NA	2625 cfm (inlet fan) 3210 cfm (exhaust Fan)