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 REVISED: June 23, 2020 EXPIRES: May 9, 2021

Rupesh Patel

SIGNATURE

Rupesh Patel, Air Program Manager, PDEQ
TITLE

Summary

This air quality permit includes two minor revisions of the 5-year, individual permit issued, on May 10, 2016 to Poly Print, Inc. (Poly Print), the Permittee, for its decorative plastic film printing process located at 2300 W Wetmore Road, Tucson, Arizona. Details of the minor permit revisions are discussed in the Technical Support Document.

Poly Print 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 three 10-color Uteco flexographic printing presses for printing. 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 Central Emission drums of the printing presses and the ink compartments that are attached to each press are housed in 100% containment enclosures in order to guarantee an emissions collection efficiency of 100%. Emissions from the printing lines are routed to two regenerative thermal oxidizers (RTO). Two of the printing presses (ID# 2990 & ID# 1953) exhaust to the 30,000 SCFM rated RTO and printing press 3 exhaust to the 12,000 SCFM rated RTO (ID# 2605). The facility proposes to voluntarily limit VOC 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. The 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 of the facility is based on operating 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	**Single HAP**	**Total HAPs**	**Ozone**
Uncontrolled Potential To Emit	694.00	-	0.53	16.79
Allowable Emissions	90.00	9.00	22.5	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.

Table of Contents

Section 1

General Conditions

1. 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 17.11.010.D & PCC 17.13.010]

2. 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]

Emission Limits and Standards

3. General Control Standards

a. 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 17.11.020 & PCC 17.16.020.A]

b. 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]

c 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]

4. Materials Handling Standards

a. 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]

b. 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]

5. 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]

6. 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%]

a. 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]

b. 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]

c. 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]

d. When the presence of uncombined water is the only reason for failure of a source to otherwise meet the requirements of 6 and 7 of this Section, 6 and 7 of this Section shall not apply. [PCC 17.16.040.B]

7. Visibility Limiting Standard [PCC 17.16.050]

a. 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.

b. 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.

   i. 7.b 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.

   ii. 7.b of this Section shall not apply to the generation of airborne particulate matter from undisturbed land.

8. Monitoring Requirements [PCC 17.13.020.A.3]

Except as otherwise contained in the Specific Conditions of this permit, monitoring for compliance with the facility-wide standards in 3 through 7 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.

9. 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 17.13.020.A.4]

a. Record Retention

All records required by this permit shall be retained for at least five years. [PCC 17.13.020.4.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 17.11.060, & PCC 17.24.020.A]

10. Reporting Requirements [PCC 17.13.020.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 17.13.020.A.5 and PCC 17.13.190]

i. 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 17.13.190.B. To report excess emissions, call **520-724-7400,** fax to **520-838-7432,** or e-mail **air.notices@pima.gov**.

ii. Detailed written notification by submission of an excess emissions report within 72 hours of the notification in 10.a.i above. Send to **PDEQ 33 N. Stone Ave, Suite 700, Tucson, Arizona 85701** or e-mail **air.notices@pima.gov**.

b. Emissions Inventory Reporting: [PCC 17.13.180]

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 17.13.010.I]

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

11. 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 17.13.100, PCC 17.13.130 or PCC 17.13.140. [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 17.11.090.C. [PCC 17.13.110.C]

c. The Permittee shall maintain a log of other facility changes that do not require revision or notice in accordance with PCC 17.13.110.B. [PCC 17.13.110.B]

12. Testing Requirements [PCC 17.11.160, PCC 17.11.210, PCC 17.20.010, ACC R18-2-311 & ACC R18-2-312]

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.

a. Operational Conditions During Testing

Performance tests shall be conducted under such conditions as the Control Officer shall specify to the plant operator based on representative performance of the source. The owner or operator shall make available to the Control Officer such records as may be necessary to determine the conditions of the performance tests. Operations during start-up, shutdown, and malfunction (as defined in PCC 17.04.340.A) shall not constitute representative operational conditions unless otherwise specified in the applicable requirement.

b. Tests shall be conducted and data reduced in accordance with the test methods and procedures contained in the Arizona Testing Manual, 40 CFR 52; Appendices D and E, 40 CFR 60; Appendices A through F; and 40 CFR 61, Appendices B and C unless modified by the Control Officer pursuant to PCC 17.11.210.B.

c. Test Plan

At least 14 working days prior to performing a test, the Permittee shall submit a test plan to the Control Officer, in accordance with PCC 17.11.210.D and the Arizona Testing Manual.

d. Stack Sampling Facilities

The Permittee shall provide or cause to be provided performance testing facilities as follows:

1. Sampling ports adequate for test methods applicable to the facility;

2. Safe sampling platform(s);

3. Safe access to sampling platform(s); and

4. Utilities for sampling and testing equipment.

e. Interpretation of Final Results

Each performance test shall consist of three separate runs using the applicable test method. Each run shall be conducted for the time and under the conditions specified in the applicable standard. For the purpose of determining compliance with an applicable standard, the arithmetic means of results of the three runs shall apply. In the event that a sample is accidentally lost or conditions occur in which one of the three runs is required to be discontinued because of forced shutdown, failure of an irreplaceable portion of the sample train, extreme meteorological conditions, or other circumstances beyond the Permittee's control, compliance may, upon the Control Officer's approval, be determined using the arithmetic mean of the results of the other two runs. If the Control Officer or the Control Officer's designee is present, tests may only be stopped with the Control Officer's or such designee's approval. If the Control Officer or the Control Officer's designee is not present, tests may only be stopped for good cause. Good cause includes: forced shutdown, failure of an irreplaceable portion of the sample train, extreme meteorological conditions, or other circumstances beyond the Permittee's control. Termination of any test without good cause after the first run is commenced shall constitute a failure of the test.

f. Report of Final Test Results

A written report of the results of performance tests conducted shall be submitted to the Control Officer within four weeks after the completion of the testing as specified in the Arizona Testing Manual. All performance testing reports shall be submitted in accordance with the Arizona Testing Manual and PCC 17.11.210.A.

g. 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.

13. Severability Clause [PCC 17.13.020.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.

14. Permit Revision, Reopening, Revocation and Reissuance, or Termination for Cause [PCC 17.13.020.A.7.c]

The permit may be revised, reopened, revoked and reissued, or terminated for cause pursuant to PCC 17.13.150. 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.

15. Duty to Provide Information [PCC 17.13.010.G and PCC 17.13.020.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 17.13.240.
[PCC 17.13.020.A.9 & PCC 17.13.240]

Section 2

Specific Conditions

Emission Limitation

16. 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 17.11.120.3.a & PCC 17.11.190.B]

[Material Permit Condition and Federally Enforceable Condition]

Standards, Monitoring and Recordkeeping Requirements [PCC 17.13.020.A.3 and 4]

17. The Permittee shall maintain on site a Manufacturer's Product Information Sheet (Safety Data Sheet or its equivalent) for each VOC containing product shipped to the facility and used in the Flexographic 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 (not to exceed 100% total VOC content).

18. To demonstrate compliance with Permit Condition 16 in Section 2 of the Permit, the Permittee shall monitor and record the following information, and maintain this information for a period of five years.

[PCC 17.13.020.B.1.b.ii]

[Federally Enforceable Conditions]

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. For each VOC-containing material the Permittee shall identify and record the type of process (ink, coating, adhesive, cleaning material etc.) in which the VOC-containing material is utilized. The Permittee shall not have to account for VOC usage for processes that have been determined to be insignificant (eg plate cleaning and Nordmechanica).

c. The amount of VOC used 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 Permit Condition 17 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 usage. The result will be a weight, in Tons, of VOC usage for that month.

d. The twelve-month rolling total VOC usage.

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

e. The amount of VOC emission for each month.

The Permittee shall maintain monthly records of VOC emissions from the combination of all printing operations by:

i. taking the control efficiency, determined by the most recent performance test and capture efficiency into consideration for the VOC emission vented to a control device;

ii. taking into consideration the VOC emissions that are not vented to a control device (Calculate as 100% emitted.);

iii. taking into consideration that during periods when the control devices are not operating and the presses are still operating and exhausting emissions to the control device (calculate as 100% emitted and use the lbs/hr emission rate in the inlet to the RTO calculated in the most recent performance test).

f. The 12-month rolling total VOC emissions.

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

19. The information required in 18 of this section for each calendar month shall be completed and recorded by the eleventh calendar day of the following month. [PCC 17.13.020.B.1.b.ii]

[Federally Enforceable Conditions]

Emissions Control and Prevention Practices

20. Regenerative Thermal Oxidizers (RTO) Operating Requirements

[PCC 17.11.120, PCC 17.11.190.C.2 & PCC 17.13.020.B.1.b]

[Material Permit Conditions and Federally Enforceable Conditions]

The Permittee must operate and maintain the RTOs as follows.

a. The RTO's shall have a minimum control efficiency of 95% and the operating temperature set point must be maintained at a minimum of 1500º F The Permittee shall use the operating temperature corresponding with a VOC destruction of at least 95% established during the most recent performance testing.

b. The RTOs shall be equipped with a monitor that continuously measures and records the combustion chamber temperature. The temperature shall be maintained at a 3-hour average temperature established during testing that achieves the required destruction efficiency. The monitor shall be calibrated at least once annually and shall be accurate to ± 5 degrees. The Permittee shall maintain these records on site and shall provide them to the Control Officer upon request. [PCC 17.11.120.b & PCC 17.13.020.B.b.ii]

c. The RTOs 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 20.a of this section.

d. 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 the operating temperature established in permit Condition 21.a in any consecutive 30 minute period in an upset condition log. Each event must be evaluated and documented in accordance with 10.a of Section 1 of this permit. The following are not considered violations of the permit:

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

ii. Continual operation of the permitted equipment (printing lines) when the RTO is shut down for maintenance or for unforeseen RTO breakdowns unless continuing would cause the source to exceed the emission limitation in Permit Condition 16 in Section 2 of the permit.

21. The Permittee shall operate each RTO in accordance with vendor-supplied operations and maintenance (O & M) instructions. If vendor-supplied O & M instructions are not available, the Permittee shall prepare O & M Instructions, which provides adequate information to properly operate and maintain the RTOs in good working order. The O & M instructions shall be made available to the Control Officer within 30 days of issuance of the Permit. At a minimum the O & M instructions shall: [PCC 17.13.020.A.2]

a. include a preventative maintenance program for the RTO equipment,

b. describe the corrective actions to be taken to restore the equipment to proper operation to meet applicable permit conditions,

c. describe the employee training program for proper operation and maintenance of the RTO equipment,

d. a procedure for maintaining the records kept to demonstrate plan implementation.

22. The Central Impression drums on all three presses are to be enclosed, with 100% of VOC captured and directed to an RTO. [PCC 17.13.020.A.2]

23. All ink rooms are to be enclosed with 100% of VOCs captured and directed to an RTO. [PCC 17.13.020.A.2]

24. The Permittee must maintain the drum enclosures on the presses and the three ink rooms as Permanent Total Enclosures. To qualify as a Permanent Total Enclosure (100% Capture Efficiency) the enclosures must meet the criteria of EPA Method 204 – Criteria and Verification of a Permanent or Temporary Total Enclosure as follows: [PCC 17.13.020.A.2]

a.. The presses' drum enclosures and ink rooms shall maintain 5-point criteria for permanent total enclosures according to the following: [EPA-452/F-03-033, Test Method 204]

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

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

iii. 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.

iv. All doors to the enclosure are normally closed.

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

b. Each presses' drum shall automatically shut off when the door to the printing press drum enclosure is opened.

[PCC 17.11.120.3.b & PCC 17.13.020.B.1.b.ii]
[Material Permit Conditions and Federally Enforceable Conditions]

c. The entrance to each press ink room enclosure shall have self-closing doors that shall remain closed except when entering and exiting the ink rooms.

[PCC 17.11.120.3.b& PCC 17.13.020.B.1.b.ii]
[Material Permit Conditions and Federally Enforceable Conditions]

25. The Permittee shall not: [PCC 17.16.400.A]

a. Use open containers to store or dispose of cloth or paper impregnated with VOC or solvents that are used for surface preparation, cleanup or the removal of ink, coating or adhesive;

b. Use open containers to store or dispose of spent or fresh VOC or solvents used for surface preparation, cleanup or the removal of ink, coating or adhesive;

c. Use open containers to store, dispose or dispense ink, coating or adhesive unless production, sampling, maintenance or inspection procedures require operational access. This provision does not apply to the actual device or equipment designed for the purposes of applying an ink, coating or adhesive to a substrate.

Reporting Requirements [PCC 17.13.020.A.5]

26. No Additional. Reporting shall be in accordance with condition 10 of Section 1 of this Permit

Testing Requirements [PCC 17.11.210]

27. Within 60 days after achieving the maximum production rate at which the Permittee will operate, but not later than 180 days after initial startup of the new press and the new RTO, the Permittee shall conduct performance tests on both the existing and new RTOs to establish the operating temperature that corresponds to a destruction efficiency of at least 90% of the existing and new RTO. The tests shall be performed in accordance with condition 12 of Section 1 of this Permit.

28. The Permittee shall demonstrate the Permanent Total Enclosures around the drums and ink rooms meets EPA Method 204 – Criteria and Verification of a Permanent or Temporary Total Enclosure describe in Permit Condition 24 at the time of the performance testing in Permit Condition 29.

29. The Control Officer may, at any time, request additional stack testing and capture efficiency verification.

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

17.11.010	Statutory authority
17.11.020	Planning, constructing, or operating without a permit
17.13.190	Reporting requirements
17.11.160	Test methods and procedures
17.11.210	Performance tests
17.11.060	Permit display or posting
17.13.010	Permit application processing procedures for Class II and Class III permits
17.13.020	Permit contents for Class II permits
17.13.240	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

PRINTING LINE (PL)	MANUFACTURER	EQUIPMENT NAME	TYPE/CAPACITY	MODEL	SERIAL NUMBER	Manufacture Date	Installation Date
2	Uteco	Flexographic Press & Ink Room	Ten Color CI	Emerald 130	1953	01/2005	02/2006
3	Uteco	Flexographic Press & Ink Room	Ten Color	Onyx 108 110	2605	01/2016	05/2016
4	Uteco	Flexographic Press & Ink Room	Ten Color	Onyx 108 110	2990	09/2019	TBD
RTO-1 (PL 3)	Ship & Shore Environmental	Regenerative Thermal Oxidizer	12,000 SCFM	SSE-12K-90X-RTO	2012-379-1212	09/2012	02/2013
RTO-2 (PL 2 & 4)	Ship & Shore Environmental	Regenerative Thermal Oxidizer	30,000 SCFM	TBD	TBD	01/2020	TBD

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
	Plate Cleaner				