

**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 17.11, Article II, Pima County Code)

ISSUED TO

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

This air quality permit does not relieve Poly Print, Inc. from the responsibility for complying with any other applicable federal, state, and local requirements.

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

PDEQ PERMIT NUMBER **671**

PERMIT CLASS **III**

ISSUED: October 11, 2021

Revised: March 22, 2022

EXPIRES: October 10, 2026


SIGNATURE

Rupesh Patel, Air Program Manager, PDEQ
TITLE

Summary

This is a significant revision of the individual air quality permit issued, on October 11, 2021, to Poly Print, Inc. (Poly Print), the Permittee, for its decorative plastic film printing process, located at 2300 W Wetmore Road, Tucson, Arizona.

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. Emissions from the printing lines are routed to a regenerative thermal oxidizer (RTO). All three of the printing presses (ID# 2990, ID# 2605 & ID# 1953) exhaust to the 30,000 SCFM rated RTO (ID# RTO2). 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 from 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 has volunteered to limit their emissions of VOCs to 90 tons per any 12-consecutive calendar month period. Poly Print is a Class III synthetic minor source for VOCs and a true minor source for all other regulated air pollutants.

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

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GENERAL CONDITIONS

(References to A.R.S. are references to the Arizona Revised Statutes, references to A.A.C. are references to the Arizona Administrative Code, and references to PCC are references to Title 17 of the Pima County Code)

1. PERMIT EXPIRATION AND RENEWAL [PCC 17.11.090.A & PCC 17.13.010.C.2, PCC 17.13.020.A.1]

- a. This permit is valid for a period of five years from the date of issuance.
- b. The Permittee shall submit an application for renewal of this permit at least 6 months, but not more than 18 months prior to the date of permit expiration.

2. COMPLIANCE WITH PERMIT CONDITIONS [PCC 17.13.020.A.7.a & b]

- a. The Permittee shall comply with all conditions of this permit including all applicable requirements of the Arizona air quality statutes and Pima County air quality rules. Any permit noncompliance constitutes a violation of the Arizona Revised Statutes and is grounds for enforcement action; for permit termination, revocation and reissuance, or revision; or for denial of a permit renewal application. In addition, noncompliance with any federally enforceable requirement constitutes a violation of the Clean Air Act.
- b. It shall not be a defense for a Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

3. PERMIT REVISION, REOPENING, REVOCATION AND REISSUANCE, OR TERMINATION FOR CAUSE [PCC 17.13.020.A.7.c & PCC 17.13.150]

- a. The permit may be revised, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a permit revision, revocation and reissuance, termination; or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
- b. The permit shall be reopened and revised under any of the following circumstances:
 - i. Additional applicable requirements under the Act become applicable to a major source with a remaining permit term of three or more years. Such a reopening shall be completed not later than eighteen months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to PCC17.13.160. Any permit reopening required pursuant to this paragraph shall comply with provisions in PCC 17.13.160 for permit renewal and shall reset the five-year permit term.
 - ii. The Control Officer or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
 - iii. The Control Officer or the Administrator determines that the permit needs to be revised or revoked to assure compliance with the applicable requirements.
- c. Proceedings to reopen and reissue a permit, including appeal of any final action relating to a permit reopening, shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Such reopenings shall, except for reopenings under condition 3.b.i above, affect only those parts of the permit for which cause to reopen exist. Such reopenings shall be made as expeditiously as practicable. Permit reopenings for reasons other than those stated in condition 3.b.i above shall not result in a resetting of the five-year permit term.

4. POSTING OF PERMIT

[PCC 17.11.060, SIP Rule 222 & ARS 49-485]

The Permittee, who has been granted an individual permit by PDEQ or a general permit and authorization to operate (ATO), shall maintain a complete copy of the permits and ATO's onsite. If it is not feasible to maintain a copy of the permit and ATO onsite, the Permittee may request, in writing, to maintain a copy of the permit at an alternate location. Upon written approval by the Control Officer, the Permittee must maintain a complete copy of the permit at the approved alternative location. In addition, the machine(s), equipment, device(s), or other article(s) for which the permit or ATO has been issued shall be affixed with a unique and clearly visible and accessible identification (ID).

5. FEE PAYMENT

[PCC 17.13.020.A.8 & PCC 17.13.240, SIP Rule 214]

The Permittee shall pay fees to the Control Officer pursuant to PCC 17.13.240.

6. CERTIFICATION OF TRUTH, ACCURACY AND COMPLETENESS

[PCC 17.13.010.H]

Any document required to be submitted by this permit, including reports, shall contain a certification by a responsible official of truth, accuracy, and completeness. This certification and any other certification required by this permit shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

7. INSPECTION AND ENTRY

[PCC 17.20.050]

The Permittee shall allow the Control Officer or the authorized representative of the Control Officer upon presentation of proper credentials to:

- a. Enter upon the Permittee's premises where a source is located, emissions-related activity is conducted, or where records are required to be kept under the conditions of the permit;
- b. Have access to and copy, at reasonable times, any records that are required to be kept under the conditions of the permit;
- c. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit;
- d. Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or other applicable requirements; and
- e. Record any inspection by use of written, electronic, magnetic and photographic media.

8. PERMIT REVISION PURSUANT TO FEDERAL HAZARDOUS AIR POLLUTANT STANDARD

[PCC 17.13.010.C.3]

If this source becomes subject to a standard promulgated by the Administrator pursuant to Section 112(d) of the Clean Air Act (National Emission Standards for Hazardous Air Pollutants - NESHAP), then the Permittee shall, within twelve months of the date on which the standard is promulgated, submit an application for a permit revision demonstrating how the source will comply with the standard.

9. EXCESS EMISSIONS, PERMIT DEVIATIONS, AND EMERGENCY REPORTING

a. Excess Emissions Reporting

[PCC 17.13.190

i. Excess emissions shall be reported as follows:

(A) The Permittee shall report to the Control Officer any emissions in excess of the limits established by this permit. Such report shall be in two parts as specified below:

- (i) Notification by telephone, facsimile or e-mail within 24 hours of the time when the Permittee first learned of the occurrence of excess emissions including all available information in condition 9.a.i(B) below. The number to call to report excess emissions is **520-724-7400**. The facsimile number to report excess emissions is **520-838-7432**. The e-mail to report excess emissions is Air.Notices@pima.gov
- (ii) Detailed written notification by submission of an excess emissions report within 72 hours of the notification in 9.a.i(A)(i) above. Notifications should be mailed or e-mailed to:

PDEQ Air Program 33 N. Stone Avenue, Suite 700, Tucson, Arizona 85701.
Air.Notices@pima.gov

(B) The report shall contain the following information:

- (i) Identity of each stack or other emission point where the excess emission occurred;
 - (ii) Magnitude of the excess emissions expressed in the units of the applicable emission limitation and the operating data and calculations used in determining the magnitude of the excess emissions;
 - (iii) Date, time, and duration or expected duration of the excess emissions;
 - (iv) Identity of the equipment from which the excess emissions emanated;
 - (v) Nature and cause of the emissions;
 - (vi) If the excess emissions were the result of a malfunction, steps taken to remedy the malfunction and the steps taken or planned to prevent the recurrence of such malfunctions; and
 - (vii) The steps that were or are being taken to limit the excess emissions; If the excess emissions resulted from start-up or malfunction, the report shall contain a list of the steps taken to comply with permit procedures.
- ii. In the case of continuous or recurring excess emissions, the notification requirements of this section shall be satisfied if the source provides the required notification after excess emissions are first detected and includes in such notification an estimate of the time the excess emissions will continue. Excess emissions occurring after the estimated time period or changes in the nature of the emissions as originally reported shall require additional notification pursuant to permit condition 9.a.i above.

b. Permit Deviations (Other than Excess Emissions) Reporting [PCC 17.12.040.A.5.b, PCC 17.13.070.C.2.f]

The Permittee shall promptly report deviations from permit requirements, including those attributable to upset conditions as defined in the permit, the probable cause of such deviations, and any corrective actions or preventive measures taken. Prompt reporting shall mean that the report was submitted to the Control Officer by certified mail, facsimile, e-mail (Air.Notices@pima.gov) or hand delivery within two working days of the time when emission limitations were exceeded due to an emergency or within two working days of the time when the Permittee first learned of the occurrence of a deviation from a permit requirement.

c. Emergency Provision [PCC 17.13.020.D]

- i. An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, that requires immediate corrective action to restore normal operation and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emission attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operator error.
- ii. An emergency constitutes an affirmative defense to an action brought for noncompliance with the technology-based emission limitations if permit condition 9.c.iii below is met.
- iii. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:
 - (A) An emergency occurred and that the Permittee can identify the cause or causes of the emergency;
 - (B) The permitted facility was being properly operated at the time of the emergency;
 - (C) During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements in the permit; and
 - (D) The Permittee submitted notice of the emergency to the Control Officer by certified mail, facsimile, e-mail (Air.Notices@pima.gov) or hand delivery within two working days of the time when emission limitations were exceeded due to the emergency. This notice shall contain a description of the emergency, any steps taken to mitigate emissions, and corrective action taken.
- iv. In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- v. This provision is in addition to any emergency or upset provision contained in any applicable requirement.

d. Affirmative Defenses for Excess Emissions Due to Malfunctions, Startup, and Shutdown. [PCC 17.13.200]

i. Applicability

This rule establishes affirmative defenses for certain emissions in excess of an emission standard or limitation and applies to all emission standards or limitations except for standards or limitations:

- (A) Promulgated pursuant to Sections 111 or 112 of the Clean Air Act;
- (B) Promulgated pursuant to Titles IV or VI of the Clean Air Act;
- (C) Contained in any Prevention of Significant Deterioration (PSD) or New Source Review (NSR) permit issued by the U.S. EPA; or
- (D) Included in a permit to meet the requirements of PCC 17.16.590.A.5.

ii. Affirmative Defense for Malfunctions

Emissions in excess of an applicable emission limitation due to malfunction shall constitute a violation. When emissions in excess of an applicable emission limitation are due to a malfunction, the Permittee has an affirmative defense to a civil or administrative enforcement proceeding based on that violation, other than a judicial action seeking injunctive relief, if the Permittee has complied with the reporting requirements of permit condition 9.a above and has demonstrated all of the following:

- (A) The excess emissions resulted from a sudden and unavoidable breakdown of process equipment or air pollution control equipment beyond the reasonable control of the Permittee;
- (B) The air pollution control equipment, process equipment, or processes were at all times maintained and operated in a manner consistent with good practice for minimizing emissions;
- (C) If repairs were required, the repairs were made in an expeditious fashion when the applicable emission limitations were being exceeded. Off-shift labor and overtime were utilized where practicable to ensure that the repairs were made as expeditiously as possible. If off-shift labor and overtime were not utilized, the Permittee satisfactorily demonstrated that the measures were impracticable;
- (D) The amount and duration of the excess emissions (including any bypass operation) were minimized to the maximum extent practicable during periods of such emissions;
- (D) All reasonable steps were taken to minimize the impact of the excess emissions on ambient air quality;
- (F) The excess emissions were not part of a recurring pattern indicative of inadequate design, operation, or maintenance;
- (G) During the period of excess emissions there were no exceedances of the relevant ambient air quality standards established in PCC Chapter 17.08 that could be attributed to the emitting source;
- (H) The excess emissions did not stem from any activity or event that could have been foreseen and avoided, or planned, and could not have been avoided by better operations and maintenance practices;
- (I) All emissions monitoring systems were kept in operation if at all practicable; and

- (J) The Permittee's actions in response to the excess emissions were documented by contemporaneous records.

iii. Affirmative Defense for Startup and Shutdown

(A) Except as provided in permit condition 9.e.iii(B) below, and unless otherwise provided for in the applicable requirement, emissions in excess of an applicable emission limitation due to startup and shutdown shall constitute a violation. When emissions in excess of an applicable emission limitation are due to startup and shutdown, the Permittee has an affirmative defense to a civil or administrative enforcement proceeding based on that violation, other than a judicial action seeking injunctive relief, if the Permittee has complied with the reporting requirements of permit condition 9.a above and has demonstrated all of the following:

- (i) The excess emissions could not have been prevented through careful and prudent planning and design;
- (ii) If the excess emissions were the result of a bypass of control equipment, the bypass was unavoidable to prevent loss of life, personal injury, or severe damage to air pollution control equipment, production equipment, or other property;
- (iii) The source's air pollution control equipment, process equipment, or processes were at all times maintained and operated in a manner consistent with good practice for minimizing emissions;
- (iv) The amount and duration of the excess emissions (including any bypass operation) were minimized to the maximum extent practicable during periods of such emissions;
- (v) All reasonable steps were taken to minimize the impact of the excess emissions on ambient air quality;
- (vi) During the period of excess emissions there were no exceedances of the relevant ambient air quality standards established in PCC Chapter 17.08 that could be attributed to the emitting source;
- (vii) All emissions monitoring systems were kept in operation if at all practicable; and
- (viii) Contemporaneous records documented the Permittee's actions in response to the excess emissions.

(B) If excess emissions occur due to a malfunction during routine startup and shutdown, then those instances shall be treated as other malfunctions subject to condition above.

iv. Affirmative Defense for Malfunctions during Scheduled Maintenance

If excess emissions occur due to a malfunction during scheduled maintenance, then those instances will be treated as other malfunctions subject to permit condition 9.e.ii above.

v. Demonstration of Reasonable and Practicable Measures

For an affirmative defense under permit conditions 9.e.ii or iii above, the Permittee shall demonstrate, through submission of the data and information required by permit conditions 9.E.1 through 5 and 9.A that all reasonable and practicable measures within the Permittee's control were implemented to prevent the occurrence of the excess emissions.

10. RECORDKEEPING REQUIREMENTS

[PCC 17.13.020.A.4]

- a. The Permittee shall keep records of all required monitoring information including but not limited to the following:
 - i. The date, place as defined in the permit, and time of sampling or measurements;
 - ii. The date(s) analyses were performed;
 - iii. The name of the company or entity that performed the analyses;
 - iv. A description of the analytical techniques or methods used;
 - v. The results of such analyses; and
 - vi. The operating conditions as existing at the time of sampling or measurement.
- b. The Permittee shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings or other data recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.
- c. All required records shall be maintained either in an unchangeable electronic format or in a handwritten logbook utilizing indelible ink.

11. REPORTING REQUIREMENTS

[PCC 17.12.020.A.5, PCC 17.13.070.C.2.f]

The Permittee shall submit the following reports:

- a. Excess emission; permit deviation, and emergency reports in accordance with section 9 above.
- b. Performance test results in accordance with permit condition 15.f below.
- c. Other reports as required by any condition in the Specific Conditions of this permit.

12. DUTY TO PROVIDE INFORMATION

[PCC 17.13.020.A.7.e, PCC 17.13.010.G, & PCC 17.13.010.E.4, SIP Rule 621]

- 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 an additional copy of such records directly to the Administrator along with a claim of confidentiality.
- b. If the Permittee has failed to submit any relevant facts or 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. In addition, an applicant shall provide additional information as necessary to address any requirements that become applicable to the source after the date it filed a complete application but prior to release of a proposed permit.

13. PERMIT AMENDMENT OR REVISION

[PCC 17.13.110, PCC 17.13.050 & PCC 17.13.140]

The Permittee shall apply for a permit amendment or revision for changes to the facility which do not qualify for a facility change without revision under section 14 below as follows:

- a. Administrative Permit Amendment (PCC 17.13.120);
- b. Minor Permit Revision (PCC 17.13.130);
- c. Significant Permit Revision (PCC 17.13.140).

The applicability and requirements for such action are defined in the above referenced regulations.

14. PROCEDURES FOR CERTAIN CHANGES THAT DO NOT REQUIRE A PERMIT REVISION

[PCC 17.13.110]

- a. Except for a physical change or change in the method of operation at a Class II or Class III source requiring a permit revision under PCC 17.13.100, or a change subject to logging or notice requirements in permit conditions 14.b or c, a change at a Class II or Class III source shall not be subject to revision, notice, or logging requirements under this chapter.
- b. Except as otherwise provided in the conditions applicable to an emissions cap created under PCC 17.13.070, the following changes may be made if the source keeps onsite records of the changes according to permit conditions 14.b.i – v below:
 - i. Implementing an alternative operating scenario, including raw material changes;
 - ii. Changing process equipment, operating procedures, or making any other physical change if the permit requires the change to be logged;
 - iii. Engaging in any new insignificant activity listed in PCC 17.04.340(A)(113)(a) through (i), but not listed in the permit;
 - iv. Replacing an item of air pollution control equipment listed in the permit with an identical (same model, different serial number) item. The Control Officer may require verification of efficiency of the new equipment by performance tests; and
 - v. A change that results in a decrease in actual emissions if the source wants to claim credit for the decrease in determining whether the source has a net emissions increase for any purpose. The logged information shall include a description of the change that will produce the decrease in actual emissions. A decrease that has not been logged is creditable only if the decrease is quantifiable, enforceable, and otherwise qualifies as a creditable decrease.
- c. Except as provided in the conditions applicable to an emissions cap created under PCC 17.13.070, the following changes may be made if the source provides written notice to the department in advance of the change as provided below:
 - i. Replacing an item of air pollution control equipment listed in the permit with one that is not identical but that is substantially similar and has the same or better pollutant removal efficiency: Seven days. The Control Officer may require verification of efficiency of the new equipment by performance tests;
 - ii. A physical change or change in the method of operation that increases actual emissions more than ten percent of the major source threshold for any conventional pollutant but does not require a permit revision: seven days;

- iii. Replacing an item of air pollution control equipment listed in the permit with one that is not substantially similar but that has the same or better efficiency: Thirty days. The Control Officer may require verification of efficiency of the new equipment by performance tests;
 - iv. A change that would trigger an applicable requirement that already exists in the permit: Thirty days unless otherwise required by the applicable requirement;
 - v. A change that amounts to reconstruction of the source or an affected facility: Seven days. For purposes of this subsection, reconstruction of a source or an affected facility shall be presumed if the fixed capital cost of the new components exceeds fifty percent of the fixed capital cost of a comparable entirely new source or affected facility and the changes to the components have occurred over the twelve consecutive months beginning with commencement of construction; and
 - vi. A change that will result in the emissions of a new regulated air pollutant above an applicable regulatory threshold but that does not trigger a new applicable requirement for that source category: Thirty days. For purposes of this requirement, an applicable regulatory threshold for a conventional air pollutant shall be ten percent of the applicable major source threshold for that pollutant.
- d. For each change under permit condition 14.c, the written notice shall be by certified mail, hand delivery or e-mail (Air.Permits@pima.gov) and shall be received by the Control Officer the minimum amount of time in advance of the change. Notifications of changes associated with emergency conditions, such as malfunctions necessitating the replacement of equipment, may be provided with less than required notice, but must be provided as far in advance of the change, or if advance notification is not practicable, as soon after the change as possible. The written notice shall include:
- i. When the proposed change will occur,
 - ii. A description of the change,
 - iii. Any change in emissions of regulated air pollutants, and
 - iv. Any permit term or condition that is no longer applicable as a result of the change.
- e. A source may implement any change in permit condition 14.c without the required notice by applying for a minor permit revision under permit condition 13.b and complying with permit conditions 14.c.ii and 14.g.
- f. The permit shield described in permit condition 18 shall not apply to any change made under this section, other than implementation of an alternate operating scenario under permit condition 14.b.i.
- g. Notwithstanding any other part of this section, the Control Officer may require a permit to be revised for any change that, when considered together with any other changes submitted by the same source under this section over the term of the permit, constitutes a change under PCC 17.13.100(A).
- h. If a source change is described under both permit conditions 14.b and c, the source shall comply with permit condition 14.c. If a source change is described under both permit conditions, 14.c and PCC 17.13.100(B), the source shall comply with PCC 17.13.100(B)

- i. A copy of all logs required under permit condition 14.b shall be filed with the Control Officer within thirty days after each anniversary of the permit issue date. If no changes were made at the source requiring logging, a statement to that effect shall be filed instead.
- i. Each log entry required by a change under permit condition 14.b shall include at least the following information:
 - (A) A description of the change, including:
 - (i) A description of any process change.
 - (ii) A description of any equipment change, including both old and new equipment descriptions, model numbers and serial numbers, or any other unique equipment number.
 - (iii) A description of any process material change.
 - (B) The date and time that the change occurred.
 - (C) The provision of permit condition 16 that authorizes the change to be made with logging.
 - (D) The date the entry was made and the first and last name of the person making the entry.
- ii. Logs shall be kept for five years from the date created. Logging shall be performed in indelible ink in a bound log book with sequentially numbered pages, or in any other form, including electronic format, approved by the Control Officer.

15. TESTING REQUIREMENTS

[PCC 17.11.210]

- a. Sources required to conduct performance testing shall do so within 60 days after the source has achieved the capability to operate at its maximum production rate on a sustained basis but no later than 180 days after initial startup of such source. The Permittee shall conduct performance testing as specified in the specific conditions of the permit and at such other times as may be required by the Control Officer. The Permittee shall furnish the control officer a written report or the results of the tests. [PCC 17.11.210.A]

b. 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 Permittee shall make available to the Control Officer such records as may be necessary to determine the conditions of the performance tests. Operations during periods of start-up, shutdown, and malfunction (as defined in PCC 17.04.340.A) shall not constitute representative conditions of performance tests unless otherwise specified in the applicable standard. [PCC 17.11.210.C]

- c. 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 or by the Director pursuant to A.A.C. R18-2-312.B. [PCC 17.11.210.B]

d. Test Plan

At least 14 calendar 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. This test plan must include the test duration, test location(s), test methods, and source operation and other parameters that may affect the test results. [PCC 17.11.210.D]

e. Stack Sampling Facilities

[PCC 17.11.210.E]

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

- i. Sampling ports adequate for test methods applicable to the facility;
- ii. Safe sampling platform(s);
- iii. Safe access to sampling platform(s); and,
- iv. Utilities for sampling and testing equipment.

f. Interpretation of Final Results

[PCC 17.11.210.F]

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 mean of the 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. Supporting documentation, which demonstrates good cause, must be submitted.

g. Report of Final Test Results

[PCC 17.11.210.A & B]

A written report of the results of all performance tests shall be submitted to the Control Officer within 30 days after the test is performed. The report shall be submitted in accordance with the Arizona Testing Manual and PCC 17.11.210.A.

16. PROPERTY RIGHTS

[PCC 17.13.020.A.7.d]

This permit does not convey any property rights of any sort, or any exclusive privilege.

17. SEVERABILITY CLAUSE

[PCC 17.13.020.A.6]

The provisions of this permit are severable. In the event of a challenge to any portion of this permit, or if any portion of this permit is held invalid, the remaining permit conditions remain valid and in force.

18. PERMIT SHIELD

[PCC 17.11.080]

Compliance with the conditions of this permit shall be deemed compliance with any applicable requirement identified in the permit as of the date of permit issuance, provided that such applicable requirements are included and expressly identified in the permit. The permit shield shall not apply to any change made pursuant to permit conditions 15.b and 16 above.

19. ASBESTOS REQUIREMENTS (Demolition/ Renovation)

[40 CFR 61, Subpart M]

Should this stationary source, pursuant to 40 CFR 61, Subpart M become subject to the National Emission Standards for Hazardous Air Pollutants - Asbestos regulations when conducting any renovation or demolition at this premises, then the Permittee shall submit proper notification as described in 40 CFR Subpart M and shall comply with all other applicable requirements of subpart M. The Permittee shall keep a record of all relevant paperwork on file.

20. STRATOSPHERIC OZONE DEPLETING SUBSTANCES

[40 CFR 82 & PCC 17.16.710]

The Permittee shall not use, sell, or offer for sale any fluid as a substitute material for use in any motor vehicle, residential, commercial, or industrial air conditioning system, refrigerator or freezer unit, or other cooling or heating device designed to use a chlorofluorocarbon (CFC) or hydrochlorofluorocarbon (HCFC) compound as a working fluid, unless such fluid has been approved for sale and such use by the Administrator. The Permittee shall keep a record of all paperwork relevant to the applicable requirements of 40 CFR 82, Subpart F onsite.

Specific Conditions

Emission Limitation & Standards

21. 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.A.3.a & PCC 17.11.190.B.b.i, PCC 17.13.070.B.4]
[Material Permit Condition and Federally Enforceable Condition]
22. The Permittee shall install, operate *and maintain* a closed vent system to collect VOC emissions discharged from the ink rooms and printing presses and shall route them through a Regenerative Thermal Oxidizer (RTO). The Permittee shall operate the RTO in a manner consistent with good air pollution control practices for minimizing emissions of regulated air pollutants and considering the manufacturer's recommended operating procedures at all times, including periods of startup, shutdown, maintenance and malfunction. The Control Officer will determine whether the permittee is using acceptable operating and maintenance procedures based on information available to the Control Officer which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the permitted source. [PCC 17.11.120.A.3.c & d, PCC 17.11.190.B, PCC 17.13.070.C.2.e]
[Material Permit Condition and Federally Enforceable Condition]
23. The Central Impression Drum of each printing press:
- a. Is to be enclosed, with 98% of VOC captured and directed through a closed vent system to the RTO.
 - b. Shall be installed with an interlock that automatically shuts off the press when the door to the printing press drum enclosure is opened. [PCC 17.13.020.A.2]
[Federally Enforceable Condition]
24. All ink rooms are to be enclosed with 100% of VOCs captured and directed through a closed vent system to the RTO by meeting the criteria of a Permanent Total Enclosure specified in permit condition 39. [PCC 17.13.020.A.2]
[Federally Enforceable Condition]
25. The Permittee shall not: [PCC 17.16.400.A, PCC 17.16.430.F]
- 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.
26. The Permittee shall: [PCC 17.16.400.A PCC 17.16.430.F]
- a. Store all VOC-containing material (e.g., inks, adhesives, coatings, thinners, and clean-up solvents) in closed containers with labels that clearly identify the contents of the containers.
 - b. Implement procedures to minimize spills of any VOC-containing material during handling and transfer to and from containers, enclosed systems, waste receptacles and other equipment.

27. 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]

28. 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]

- 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 permit conditions 28 and 29 of this section, permit conditions 28 and 29 of this section shall not apply. [PCC 17.16.040.B]

29. 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. Permit condition 29.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. Permit condition 29.b of this section shall not apply to the generation of airborne particulate matter from undisturbed land.

Monitoring and Recordkeeping Requirements

[PCC 17.13.020.A.3 and 4]

30. 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. **[Federally Enforceable Conditions]**

- 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 VOC 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).

31. To demonstrate compliance with permit condition 21 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. (e.g. Nordmechanica Laminator).
- 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 condition 30 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 emissions for each month.

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

- i. the efficiency of VOC emissions captured and vented to the control device. (The efficiency is determined by the most recent performance test and the manufacture rated capture efficiency of the enclosed printing presses.);
 - ii. the VOC emissions that are not vented to a control device (Calculate as 100% emitted.);
 - iii. that during periods when the control device is not operating and the presses are still operating (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.

- 32. The information required in permit condition 31 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]

- 34. Regenerative Thermal Oxidizer 2 (RTO 2) 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 RTO 2 as follows.

- a. RTO 2 shall have a minimum control efficiency of 95% and the operating temperature set point must be maintained at a minimum of 1500° F until the initial performance test. After the initial performance test the Permittee shall use the operating temperature corresponding with a VOC destruction of at least 95% established during the most recent performance testing.
- b. RTO 2 shall be equipped with a monitor that continuously measures the combustion chamber temperature and records at least one temperature reading every 15 minutes. 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.A.3.b & PCC 17.13.020.B.1.b.ii]
- c. RTO 2 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 permit condition 34.a of this section. [PCC 17.11.120.A.3.b & PCC 17.13.020.B.1.b.ii]
- d. While any of the associated printing lines are operating, if the operating temperature of RTO 2 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 notify, document and report all events in which the minimum RTO 2 temperature is not returned to the operating temperature established in permit Condition 34.a in any consecutive 30 minute period in an upset condition log. Each event must be evaluated, documented and reported in accordance with permit condition 9.B.

35. 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 2 is shut down for maintenance or for unforeseen RTO 2 breakdowns unless continuing would cause the source to exceed the emission limitation in permit condition 21.

36. The Permittee shall maintain onsite the upset condition log required in permit condition 34.d.

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

[Federally Enforceable Condition]

37. The Permittee shall maintain, onsite, a log of when RTO 2 was shutdown while the presses were running. The log shall contain the following information.

[PCC 17.13.020.A.4, PCC 17.13.020.B.1.b.ii]

[Federally Enforceable Condition]

- a. The date the RTO was shutdown.
- b. The time the RTO was shutdown.
- c. The duration of the shutdown.
- d. The Presses that were running during the shutdown.
- e. The time the RTO was started up and running again.
- f. The name and signature of the person making the log entry.

38. The Permittee shall operate RTO 2 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 RTO 2 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, PCC 17.13.020.B.1.b.i]

[Federally Enforceable Conditions]

- a. include a preventative maintenance program for the RTO 2 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 2 equipment and
- d. a procedure for maintaining the records kept to demonstrate plan implementation.

39. The Permittee must maintain and operate the three ink room enclosures 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, PCC 17.13.020.B.1.b.i]

[Federally Enforceable Conditions]

- a. The presses' 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 RTO 2.
- b. 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 17.13.020.B.1.b.i]

[Federally Enforceable Condition]

40. Semiannually, the permittee shall perform an inspection of the total permanent enclosures, the central impression drum enclosures and the exhaust ductwork venting to the RTO. The permanent enclosure inspections and the central impression drum enclosures should consist of confirming the seals and the self-closing mechanisms of the doors to the enclosures are still in good working order. The exhaust ductwork inspection should confirm the ducts are still intact with no exhaust leaks between the permanent total enclosures and the RTO and between the printing presses' exhaust and the RTO. [PCC 17.13.020.A.3]

41. Records of the inspections in condition 40 shall be recorded and maintained in accordance with permit condition 10. [PCC 17.13.020.A.4]

Reporting Requirements

42. Reporting required in permit condition 34.d shall be in accordance with permit condition 9.b. [PCC 17.13.020.A.5, PCC 17.13.020.B.1.b.ii]

[Federally Enforceable Condition]

Testing Requirements

[PCC 17.11.210, PCC 17.13.020.B.1.b.ii]
[Federally Enforceable Conditions]

43. Within 60 days after achieving the maximum production rate at which the Permittee will operate, but not later than 180 days after the exhaust from Presses 2, 3 and 4 are vented to RTO 2, the Permittee shall conduct a performance test to establish the operating temperature of RTO 2 that corresponds to a VOC destruction efficiency of at least 95%. The tests shall be performed in accordance with permit condition 15.

44. The Permittee shall demonstrate the Permanent Total Enclosures around ink rooms meet EPA Method 204 – Criteria and Verification of a Permanent or Temporary Total Enclosure described in permit condition 39 at the time of the required performance testing in permit condition 43.

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

Applicable Regulations

Requirements Specifically Identified as Applicable

Compliance with the terms and conditions 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 17.11 General Provisions for Permits

- 17.11.010 Statutory authority
- 17.11.020 Planning, constructing, or operating without a permit
- 17.11.060 Permit display or posting
- 17.11.120 Material Permit Condition
- 17.11.160 Test methods and procedures
- 17.11.190 Permits containing synthetic emission limitations and standards
- 17.11.210 Performance tests

Pima County Code (PCC) Title 17, Chapter 17.13 Permits and Permit Revisions

- 17.13.010 Permit application processing procedures for Class II and Class III permits
- 17.13.020 Permit contents for Class II and Class III permits
- 17.13.070 Establishment of an emissions cap for Class II and Class III permits
- 17.13.100 Facility changes that require a permit revision for Class II or Class III permits
- 17.13.130 Minor revisions for Class II or Class III permits
- 17.13.140 Significant revisions for Class II or Class III permits
- 17.13.180 Annual emissions inventory questionnaire for Class II or Class III permits
- 17.13.190 Reporting requirements
- 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
- 17.16.130 Applicability
- 17.16.165 Standards of performance for fossil-fuel fired industrial and commercial equipment
- 17.16.400 Organic solvents and other organic materials.
- 17.16.430 Standards of performance for unclassified sources

Pima County Code (PCC) Title 17, Chapter 17.20 Emission Source Testing and Monitoring

- 17.20.010 Source sampling, monitoring, and testing

Pima County Code (PCC) Title 17, Chapter 17.24 Emission Source Recordkeeping and Reporting

- 17.24.20 Recordkeeping for compliance determinations

Applicable Regulations

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.

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	2020	2020
RTO-2 (Printing Lines 2, 3 & 4)	Ship & Shore Environmental	Regenerative Thermal Oxidizer with a Hot Gas Bypass	30,000 SCFM	SSE-30K-95X-RTO	201—733-0720	2020	8/2020

Table B: List of Insignificant Equipment

PLANT ID #	EQUIPMENT NAME	MODEL	FUEL TYPE	SERIAL NUMBER	CAPACITY
3	Uteco Laminator (water-based or solvent based adhesives)	Horizon D/ TH, Model 130	Natural Gas	1959	53 inch
4	Nordmeccanica Laminator (Solvent Free Adhesives)	Super Simplex SL 1300	Electric	2068	51 inch
NA	Plate Cleaner	NA	NA	NA	NA
-	Natural Gas Fuel Burning Equipment	Not Applicable	Natural Gas	Not Applicable	-

NA – Not Available