

United States Environmental Protection Agency General Permit for New or Modified Minor Sources of Air Pollution in Indian Country http://www.epa.gov/air/tribal/tribalnsr.html

Questionnaire for Requesting Coverage under the General Air Quality Permit for New or Modified True Minor Source Graphic Arts and Printing Operations in Indian Country

Last Modified: July 2, 2014 Version 1.0

Does the General Permit apply to my facility?

The following questionnaire is intended to help you, the facility owner or operator, determine whether or not you are eligible for a General Air Quality Permit for New or Modified True Minor Source Graphic Arts and Printing Operations. You are not required to complete it and this questionnaire is not necessary to apply for a General Air Quality Permit for New or Modified True Minor Source Graphic Arts and Printing Operations. This questionnaire does not cover all of the General Air Quality Permit requirements and does not guarantee approval of a true minor source preconstruction permit under this program.

Description of Graphic Arts and Printing Operations

A Graphic Arts and Printing Operation is any facility which uses offset lithographic, letterpress, rotogravure, and flexographic methods to apply ink and other coatings to paper, cardboard, metal, and other surfaces by means of a printing press. This Graphic Arts and Printing Operations Questionnaire is for graphic arts and printing operations that are not major sources of air pollution and that are located, or planning to locate, within Indian country.

About this Questionnaire

The questions focus on general information pertaining to your existing or future graphic arts and/or printing facility. The questionnaire is not meant to be exhaustive and only requires knowledge of basic facility information, including process rates, raw material volatile organic compound (VOC) content, raw material throughput, and fuel usage.

You should continue with this Questionnaire if you:

- Plan to construct a new, true minor source graphic arts and printing operation within Indian country;
- Plan to modify an existing, true minor source graphic arts and printing operation located within Indian country;
- Have a potential to emit (PTE) less than the New Source Review (NSR) major source thresholds and equal to or above the minor NSR applicability thresholds. See the "Does my Graphic Arts and Printing Operation Need or Qualify for a Minor Source Permit?" section below;
- Have a PTE less than the major source thresholds for hazardous air pollutants (HAPs). See the "Does my Graphic Arts and Printing Operation Need or Qualify for a Minor Source Permit?" section below;
- Are located in an attainment, unclassifiable, or attainment/unclassifiable area for ozone and, after the proposed construction or modification project, your facility's VOC emissions from the combination of all graphic arts and printing operations is projected to be less than 75 tons in any continuous rolling 12-month period;
- Are located in a marginal or moderate nonattainment area for ozone and, after the proposed construction or modification project, your facility's VOC emissions from the combination of all graphic arts and printing operations is projected to be less than 50 tons in any continuous rolling 12-month period;
- Are located in a serious ozone nonattainment area and, after the proposed construction or modification project, your facility's VOC emissions from the combination of all graphic arts and printing operations is projected to be less than 25 tons in any continuous rolling 12-month period;
- Are located in a severe ozone nonattainment area and, after the proposed construction or modification project, your facility's VOC emissions from the combination of all graphic arts and printing operations is projected to be less than 15 tons in any continuous rolling 12-month period;

- Are located in an extreme ozone nonattainment area and, after the proposed construction or modification project, your facility's VOC emissions from the combination of all graphic arts and printing operations is projected to be less than 7 tons in any continuous rolling 12-month period;
- Do not know whether your facility needs a permit, or do not know the attainment status of your area and want to find out whether or not you should apply for a general air quality permit or a major source permit for a graphic arts and printing operation; and
- Intend to satisfy the requirements of the Endangered Species Act (ESA) and National Historic Preservation Act (NHPA) according to the procedures attached to the Request for Coverage under the General Air Quality Permit for New or Modified True Minor Source Graphic Arts and Printing Operations.

More Information

The definition of a "modification" and "PTE" can be found at 40 CFR 49.152(d) and in the "Instructions: Graphic Arts and Printing Operations" document. Additional information on the applicability of the Indian Country Minor NSR rule can be found at 40 CFR 49.153.

Information on the ozone attainment status of the area where your facility is located can be found at: <u>http://www.epa.gov/airquality/greenbook/</u>. You may also contact your reviewing authority for information on your attainment status.

Information on any available voluntary consensus standards that can used as alternatives to the emissions measurement standards in the General Air Quality Permit for New or Modified True Minor Source Graphic Arts and Printing Operations can be found in: "Voluntary Consensus Standard Results for General Permits and Permits by Rule for the Indian Country Minor New Source Review Program; 40 CFR Part 49, Subparts 156(c) and 162," from Robin Segall, Acting Group Leader, Measurement Technology Group, to Laura McKelvey, Community and Tribal Programs Group, February 7, 2014, http://www.epa.gov/air/tribal/tribalnsr.html.

Please contact your reviewing authority if you have questions or need assistance. A list of reviewing authorities, their area of coverage, and contact information can be found in Attachment E to the General Air Quality Permit for New or Modified True Minor Source Graphic Arts and Printing Operations or by visiting: http://www.epa.gov/air/tribal/tribalnsr.html

Questionnaire for Graphic Arts and Printing Operations

Part 1: Does my Graphic Arts and Printing Operation Need a True Minor Source Permit?

The following questions are meant to determine whether or not your graphic arts and printing operation needs a true minor source permit.

 Is your facility a minor source of HAP? If the PTE of your facility is less than 10 tons per year for a single HAP and less than 25 tons per year for any combination of HAPs, your source is a minor source of HAPs. The emissions from your facility may be calculated using the PTE calculator provided at http://www.epa.gov/air/tribal/tribalnsr.html. Be sure to include all existing, new, and modified emission units.



If you answered **'No,'** your source does not qualify for the minor NSR program. Please contact your reviewing authority to apply for a site-specific permit. If you answered **'Yes,'** continue on to the next question.

Is the PTE of your facility less than 250 tons per year (tpy) for particulate matter (PM, PM₁₀, or PM_{2.5}), VOC, nitrogen oxides (NO_X), carbon monoxide (CO), and sulfur dioxide (SO₂)? The emissions from your facility may be calculated using the PTE calculator provided at <u>http://www.epa.gov/air/tribal/tribalnsr.html</u>. Be sure to include all existing, new, and modified emission units.

Yes	🗌 No
-----	------

If you answered **'No,'** your source does not qualify for the minor NSR program. Please contact your reviewing authority to apply for a site-specific permit. If you answered **'Yes,'** continue on to the next question.

3. Is the PTE of your new facility or the emissions increase from your modified existing facility equal to or above the applicable minor NSR thresholds listed below for ANY of the seven pollutants listed in the table below? The emissions from your facility may be calculated using the PTE calculator provided at http://www.epa.gov/air/tribal/tribalnsr.html. Be sure to include all new, modified, and existing emission units when determining PTE.

Pollutant	Attainment Area	Nonattainment Area
СО	10 tpy	5 tpy
PM	10 tpy	5 tpy
PM ₁₀	5 tpy	1 tpy
PM _{2.5}	3 tpy	0.6 tpy
SO ₂	10 tpy	5 tpy
NOx	10 tpy	5 tpy
VOC	5 tpy	2 tpy

	Yes		No
--	-----	--	----

If you answered **'No,'** your source is exempt from the minor NSR program. Please contact reviewing authority to confirm that your facility will not need a permit. If you answered **'Yes,'** continue on to the next question.

4. If located in a nonattainment area for any pollutant, is the PTE of your facility for the particular nonattainment pollutant less than the NSR major source thresholds specified in the table below (based on nonattainment classification)? The emissions from your facility may be calculated using the PTE calculator provided at http://www.epa.gov/air/tribal/tribalnsr.html. Be sure to include all existing, new, and modified emission units.

Pollutant	Nonattainment Classification	NSR Major Source Threshold
Ozone	Marginal	100 tpy of VOC or NOx
	Moderate	100 tpy of VOC or NO _X
	Serious	50 tpy of VOC or NOx
	Severe	25 tpy of VOC or NO _x

Pollutant	Nonattainment Classification	NSR Major Source Threshold
	Extreme	10 tpy of VOC or NO _X
PM10	Moderate	100 tpy
	Serious	70 tpy
СО	Moderate	100 tpy
	Serious	50 tpy
SO ₂ , NO ₂ , PM _{2.5}	No nonattainment classification	100 tpy

_	_		
	Yes	No	Not Applicable

If you answered **'No,'** your source does not qualify for the minor NSR program. Please contact your reviewing authority to apply for a site-specific permit. If you answered **'Yes,'** continue on to Part 2 of the Questionnaire.

Part 2: What Types of Facilities DO NOT Qualify for Coverage under this General Air Quality Permit for New or Modified True Minor Source Graphic Arts and Printing Operations?

The following questions are meant to determine whether or not your graphic arts and printing operation would be disqualified from coverage under the General Air Quality Permit for New or Modified True Minor Source Graphic Arts and Printing Operations. Please only answer the questions that are applicable to your particular graphic arts and printing operation.

1. Is your facility a textile fabric printing operation?

Yes N

2. Will the VOC emissions from any individual printing press (printing line) at your facility exceed 25 tons per year?

Yes	🗌 No
-----	------

If you answered **'No'** or **'Not Applicable'** to all of these questions, your facility may qualify for coverage under the General Air Quality Permit for New or Modified True Minor Source Graphic Arts and Printing Operations, and should continue on to Part 3 of the Questionnaire.

If you answered **'Yes'** to any of these questions, your facility likely does not qualify for coverage under the General Air Quality Permit for New or Modified True Minor Source Graphic Arts and Printing Operations. Please contact your reviewing authority to confirm that your facility will not qualify for this permit.

Part 3: Does my Graphic Arts and Printing Operation Qualify for a General Air Quality Permit for New or Modified True Minor Source Graphic Arts and Printing Operations?

The following questions are meant to determine whether or not your graphic arts and printing operation would qualify for coverage under the General Air Quality Permit for New or Modified True Minor Source Graphic Arts and Printing Operations.

1. If located in an attainment, unclassifiable, or attainment/unclassifiable area for ozone, after the proposed construction or modification project, will your facility's VOC emissions from the combination of all graphic arts and printing operations exceed 75 tons in any continuous rolling 12-month period?

	Yes No Not Applicable
2.	If located in a marginal or moderate nonattainment area for ozone, after the proposed construction or modification project, will your facility's VOC emissions from the combination of all graphic arts and printing operations exceed 50 tons in any continuous rolling 12-month period?
	Yes No Not Applicable
3.	If located in a serious nonattainment area for ozone, after the proposed construction or modification project, will your facility's VOC emissions from the combination of all graphic arts and printing operations exceed 25 tons in any continuous rolling 12-month period?
	Yes No Not Applicable
4.	If located in a severe ozone nonattainment area, after the proposed construction or modification project, will your facility's VOC emissions from the combination of all graphic arts and printing operations exceed 15 tons in any continuous rolling 12-month period?
	Yes No Not Applicable
-	If leasted in an autroma azona populationment area, after the proposed construction or modification project will

5. If located in an extreme ozone nonattainment area, after the proposed construction or modification project, will your facility's VOC emissions from the combination of all graphic arts and printing operations exceed 7 tons in any continuous rolling 12-month period?

Yes	🗌 No	Not Applicable
-----	------	----------------

6. Do you intend to satisfy the ESA and NHPA requirements according to the procedures attached to the Request for Coverage under the General Air Quality Permit for New or Modified True Minor Source Graphic Arts and Printing Operations?

Yes		No
-----	--	----

Conclusion

If you answered **'Yes'** or **'Not Applicable'** to each of the questions in Part 3, you may qualify for coverage under the General Air Quality Permit for New or Modified True Minor Source Graphic Arts and Printing Operations. If you believe based upon your answers in this questionnaire that your new or modified graphic arts and printing operation qualifies for a General Air Quality Permit for New or Modified True Minor Source Graphic Arts and Printing Operation Qualifies for a General Air Quality Permit for New or Modified True Minor Source Graphic Arts and Printing Operations, please contact your reviewing authority to obtain a permit application.

If you answered **'No'** to any of these questions, your facility may not qualify for coverage under the General Air Quality Permit for New or Modified True Minor Source Graphic Arts and Printing Operations. Please contact your reviewing authority to confirm that your facility will not qualify for a permit.