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Air Division
U.S. EPA, Region 9

April 28, 1998



Felicia Marcus, Regional Administrator
U.S. EPA Region IX
75 Hawthorne Street
San Francisco, CA 94105

Dear Ms. Marcus:

Enclosed herewith please find a Petition for Appeal of a Title V permit which was recently issued for R.R. Donnelley & Sons Company Reno Manufacturing Division in Nevada, through the Washoe County District Health Department Air Quality Management Division.

The issues have arisen due to discrepancies between language which occurred in preexisting PSD permits and federal regulations. R.R. Donnelley is confident that these issues can be addressed through application of principles in the White Paper and modifications to the Title V permit, and not through reopening of PSD permits (which have ceased to exist now that the Title V permit has been finally issued). We are currently discussing these issues with your agency, but felt compelled to protect our legal interests by filing this appeal, since the permit was issued on April 1, 1998 and the issues were not resolved before permit issuance.

If you should have any questions, please contact Monica Roth, our inhouse attorney at 312/326-7064 or myself at 702-677-3840

Sincerely,

A handwritten signature in cursive script that reads "Bill Staab".

Bill Staab
Operations Support Manager

cc: Martha Larson
New Source Section (A-3-1)
US Environmental Protection Agency
75 Hawthorne Street
San Francisco, CA 94105

Chris Ralph
Senior Environmental Engineer
Air Quality Management Division
Washoe County District Health Department
P.O. Box 11130
Reno, NV 89520



Ms. Martha Larson
New Source Section (A-3-1)
US Environmental Protection Agency
75 Hawthorne Street
San Francisco, CA 94105

April 3, 1998

Re: Title V Permit for R.R. Donnelley & Sons Company Reno, NV Facility

Dear Ms. Larson:

R.R. Donnelley & Sons Company (RRD) is requesting assistance from the Regional office to finalizing RRD's draft Title V permit. Washoe County is planning to issue the permit in its final form on 4/10/98. Chris Ralph of Washoe County forwarded a copy of the final draft to your attention on 2/19/98. R.R. Donnelley has formal objections to some of the conditions as well as several recommended changes for purposes of clarity. With respect to the formal objections, if these issues cannot be adequately resolved, the company may need to appeal the permit upon issuance. RRD has attached relevant section of the draft Title V permit, the PSD permit and recommended revisions to aid in your review. I will be contacting you at 1:30 p.m. with Dale Kalina.

We would appreciate your consideration on these issues.

Sincerely,

A handwritten signature in black ink, appearing to read 'Paul Haase', written over a horizontal line.

Paul Haase

CC: Chris Ralph. Washoe County District Health Department

ITEM #1

Draft Title V Permit

Conditions V. B. 1. and 2 (Page 7 of 18)

B. Emission Standards for VOCs from the rotogravure production printing presses [40 CFR 60 Subparts A and QQ and PSD Permit #NSR-4-7-2, NV 84-01]. The permittee shall meet all applicable requirements of 40 CFR 60 Subparts A and QQ, including the following:

1. Volatile organic material emissions from the production rotogravure presses shall not exceed more than 16 percent of the total mass of VOCs used during any one performance averaging period, pursuant to 40 CFR 60.432.
2. The permittee shall not discharge or cause the discharge of into the atmosphere hydrocarbons in excess of 1365 lbs/hour or 16 percent of the total mass of hydrocarbons used by the rotogravure presses based on a 30 day calendar average. (Reference PSD permit NSR 4-7-2 NV84-01 Condition H (1),(2)).

PSD Permit Language:

H. Emission Limits for Hydrocarbons

1. On or after the date of startup, R.R. Donnelley & Sons Co. shall not discharge or cause the discharge into the atmosphere hydrocarbons equal to more than 16 percent of the total mass of hydrocarbons used by the rotogravure presses averaged over 30 consecutive calendar days.
2. On or after the date of startup, R.R. Donnelley & Sons Co. shall not discharge or cause the discharge into the atmosphere hydrocarbons in excess of 1365 lbs/hour (30-day average) from the rotogravure presses.

Regulation:

Subpart QQ Standards of Performance for the Graphic Arts Industry: Publication Rotogravure Printing
40 CFR 60.432 Standard for volatile organic compounds.

During the period of the performance test required to be conducted by §60.8 and after the date required for completion of the test, no owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere from any affected facility VOC equal to more than 16 percent of the total mass of VOC solvent and water used at that facility during any one performance averaging period. The water used includes only that water contained in the waterborne raw inks and related coatings and the water added for dilution with waterborne ink systems.

Comment and Revision:

These conditions, as currently written, do not accurately reflect the language of 40 CFR 60.432. To properly reflect the NSPS requirement, the conditions should be revised as follows:

1. Volatile organic material emissions from the production rotogravure presses shall not exceed more than 16 percent of the total mass of VOCs and water used during any one performance- averaging period, pursuant to 40 CFR 60.432.
2. The permittee shall not discharge or cause the discharge into the atmosphere hydrocarbons in excess of 1385 lbs./hour or 16 percent of the total mass of VOCs and water used by the rotogravure presses based on a 30 day average.

The language in the PSD permit was meant to incorporate the regulatory requirements of 40 CFR 60.432, not to impose any additional requirements. As the Title V conditions are currently worded, the permit effectively prohibits the use of compliant materials (i.e., water-based ink) to meet the NSPS requirements. The "and water" provision in the NSPS was included to provide for the use of low VOC materials as an alternative to add-on controls and to promote pollution prevention. Clearly, it is not EPA's intent to impede implementation of pollution prevention activities in the Title V permit process. Therefore, the above language should be utilized in the Title V permit.

ITEM #2

Draft Title V Permit

Condition V. C. 4. (Page 8 of 18)

C. Special Conditions

4. Benzene Content Limitation - Ink and solvents used at this facility shall contain no more than 0.1 percent benzene based on an annual average. (Reference PSD permit NSR 4-7-2 NV 84-01 Condition IX.F)

PSD Permit Language

Upon startup and thereafter, solvents used at the R.R. Donnelley & Sons Co. Stead facility shall contain no more than 0.1 percent benzene

Regulation: N/A

Comment and Revision

RRD had previously requested that this condition be removed. Chris Ralph of Washoe County concurred that this condition could be removed in a 6/2/97 letter to Matt Haber of your department (see attached letter). Additionally, Region IX did not object to removal of this condition when the draft Title V was reviewed in August of 1997. HAP emissions will be covered by the gravure MACT standard effective in May 1999, making this condition obsolete. Additionally, there is no regulatory basis for inclusion of this condition in the permit, nor is it a requirement that needs to be carried forward from the PSD permit, as there was no regulatory basis for inclusion of the condition in that permit either.

ITEM #3

Draft Title V Permit

Conditions V. E. 2 and 3. (Page 8 of 18)

E. Emission standard for hydrocarbons from offset printing presses.

2. On or after the date of startup, R.R. Donnelley and Sons shall not discharge or cause to the discharge into the atmosphere of hydrocarbons equal to more than 15 percent of the total mass of hydrocarbons emitted from the offset press dryers on a 3 hour average. Reference PSD Authority To Construct Permit NSR 4-7-2, NV 84-01 – Condition IX.3.

3. On or after the date of startup, R.R. Donnelley and Sons shall not discharge or cause to discharge into the atmosphere of hydrocarbons equal to or more than 15 percent of the total mass of hydrocarbons emitted from the offset presses averaged over 30 consecutive calendar days. Under no circumstances may R.R. Donnelley emit more than 194 lbs/hour of hydrocarbons from the offset presses (30-day average). Reference PSD Authority To Construct Permit NSR 4-7-2, NV 84-01 - Condition IX H.

PSD Permit Language

H. Emission Limits for Hydrocarbons

3. On or after the date of startup, R.R. Donnelley & Sons Co. shall not discharge or cause the discharge into the atmosphere hydrocarbons equal to more than 15 percent of the total mass of hydrocarbons emitted from the offset press dryers (3--hour average)

4. On or after the date of startup, R.R. Donnelley & Sons Co. shall not discharge or cause the discharge into the atmosphere hydrocarbons equal to more than 15 percent of the total mass of hydrocarbons used by the offset presses averaged over 30 consecutive calendar days. Under no circumstances may R.R. Donnelley & Sons Co. emit more than 194 lbs/hour of hydrocarbons from the offset presses (30-day average).

Regulation:

There are no applicable regulations. However, USEPA Guideline Series: Control of Volatile Organic Emissions from Offset Lithographic Printing (Draft, September 1993) and USEPA's Alternative Control Techniques Document: Offset Lithographic Printing (EPA 453/R-94-054, June 1994), specifies a control device efficiency for offset lithographic presses, rather than an overall efficiency.

Comment and Revision

With the removal of the word "dryers", this condition is inconsistent with condition V.E.2. Since there is not 100% capture of fountain solution and cleaning solvent VOCs used on these presses, achieving 85% overall control, as opposed to 85% control device efficiency, may not be achievable under these conditions. The PSD permit application clearly indicated a control device efficiency of 85%, not an overall control requirement. This device efficiency is reflected in V.E.2. and should also be included in this condition. Clearly the intent of the PSD permit was to address the efficiency of the control device on these presses. EPA Region IX's only basis for deletion of the word "dryers" was to make sure there was an identical match in language between the Title V Permit and the PSD permit. We believe the current wording in V.E.3 reflects an inherent failure to include the word "dryers" in the PSD permit. The White Paper provides that the Title V permitting process is an opportunity to correct errors made in previous permits. The deletion of the word "dryers" in previous permits was such an error in the permitting process. RRD recommends the following revised language:

V.E.3. On or after the date of startup, R.R. Donnelley and Sons shall not discharge or cause to discharge into the atmosphere of hydrocarbons equal to or more than 15 percent of the total mass of hydrocarbons emitted from the offset press dryers averaged over 30 consecutive calendar days. Under no circumstances may R.R. Donnelley emit more than 194 lbs/hour of hydrocarbons from the offset presses (30-day average). Reference PSD Authority To Construct Permit NSR 4-7-2, NV 84-01 - Condition IX H.

ITEM #4

Draft Title V Permit

Condition VI. B. 3. (10 of 18)

B. Monitoring, Testing and Record Keeping - The permittee shall record:

3. The amount of solvent used in and recovered from gravure operations and the resultant overall solvent recovery efficiency and emissions calculated for each calendar month. The VOC content of these materials shall be determined from material safety data sheets, manufacturer specifications, process formulation data, and/or testing using USEPA Reference Method 24A. The VOC information shall include the specific content of both benzene and toluene for each solvent-containing product used in the rotogravure press systems. (Reference 40 CFR 60 Subpart QQ - Standards for Publication Rotogravure Printing.)

PSD Permit Language

Upon startup and thereafter, solvents used at the R.R. Donnelley & Sons Co. Stead facility shall contain no more than 0.1 percent benzene

Regulation:

40 CFR 60.435 Test methods and procedures.

(a) The owner or operator of any affected facility using solvent-borne ink systems shall determine the VOC content of the raw inks and related coatings used at the affected facility by:

- (1) Analysis using Reference Method 24A of routine weekly samples of raw ink and related coatings in each respective storage tank; or
- (2) Analysis using Reference Method 24A of samples of each shipment of all purchased raw inks and related coatings; or
- (3) Determination of the VOC content from the formulation data supplied by the ink manufacturer with each shipment of raw inks and related coatings used.

(b) The owner or operator of any affected facility using solvent-borne ink systems shall use the results of verification analyses by Reference Method 24A to determine compliance when discrepancies with ink manufacturers' formulation data occur.

(c) The owner or operator of any affected facility using waterborne ink systems shall determine the VOC and water content of raw inks and related coatings used at the affected facility by:

- (1) Determination of the VOC and water content from the formulation data supplied by the ink manufacturer with each shipment of purchased raw inks and related coatings used; or
- (2) Analysis of samples of each shipment of purchased raw inks and related coatings using a test method approved by the Administrator in accordance with §60.8(b).

Comment and Revision

As noted for condition V.C.4 RRD had previously requested removal of the benzene content provisions of this condition. Although the NSPS for publication rotogravure does specify determination of VOC content, there is no regulatory or other legal basis for requiring information on component hydrocarbons (i.e., benzene and toluene). HAP emissions will be covered by the gravure MACT standard effective in May 1999, making this condition obsolete. Given that Region IX did not object to the removal of the benzene limit in condition V.C.4. there appears to be no basis for the county to require its inclusion. Neither the PSD permit, nor any of the applicable federal standards, requires the analysis for benzene and toluene content. Since there appears to be no reason that the benzene and toluene contents be specifically analyzed for, we again request deletion of the sentence "The VOC information shall include the specific contents of both benzene and toluene for each solvent containing product used in the rotogravure press systems".