Commonwealth of Virginia

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

PIEDMONT REGIONAL OFFICE
4949-A Cox Road, Glen Allen, Virginia 23060
(804) 527-5020
www.deq.virginia.gov

Stefanie K. Taillon
Secretary of Natural and Historic Resources

Michael S. Rolband, PE, PWD, PWS Emeritus
Director

Jerome A. Brooks
Regional Director

DRAFT

Mr. Michael W. Gay
General Manager
Mundet Roslyn Converters, Inc.
P.O. Box 70
Colonial Heights, VA 23834

Location: City of Colonial Heights
Registration No.: 50833

Dear Mr. Gay:

Attached is a combined minor new source review permit and significant amendment to your state operating permit dated December 18, 2018 to operate a printing facility in accordance with the provisions of the Virginia Regulations for the Control and Abatement of Air Pollution. This amended permit supersedes your permit dated December 18, 2018.

The Department of Environmental Quality (DEQ) deemed the application complete on June 9, 2025 and has determined that the application meets the requirements of 9 VAC 5-80-990 A for a significant amendment to a state operating permit. The Department solicited written public comments by placing a newspaper advertisement in The Progress-Index on August 26, 2025. The required comment period, provided by 9 VAC 5-80-1020A expired on September 25, 2025.

This permit contains legally enforceable conditions. Failure to comply may result in a Notice of Violation and/or civil charges. Please read all permit conditions carefully.

This permit approval to operate shall not relieve Mundet Roslyn Converters, Inc. of the responsibility to comply with all other local, state, and federal permit regulations.

The Regulations as contained in Title 9 of the Virginia Administrative Code 5-170-200 provide that you may request a formal hearing from this case decision by filing a petition with

the Department within 30 days after this case decision notice was mailed or delivered to you. Please consult the relevant regulations for additional requirements for such requests.

As provided by Rule 2A:2 of the Supreme Court of Virginia, you have 30 days from the date you actually received this permit or the date on which it was mailed to you, whichever occurred first, within which to initiate an appeal of this decision by filing a Notice of Appeal with:

Director
Department of Environmental Quality
P. O. Box 1105
Richmond, VA 23218

If this permit was delivered to you by mail, three days are added to the thirty-day period in which to file an appeal. Please refer to Part Two A of the Rules of the Supreme Court of Virginia for information on the required content of the Notice of Appeal and for additional requirements governing appeals from decisions of administrative agencies.

If you have any questions concerning this permit, please contact the regional office at (804) 527-5020.

Sincerely,

James E. Kyle, P.E.
Air Permit Manager

JEK/lac/50833-15 Roslyn Converters SOP sigamend.docx

Attachment: Permit

cc: File
Office of Air Permits, EPA, Region 3
Air Compliance Inspector, DEQ

Commonwealth of Virginia

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STATIONARY SOURCE PERMIT TO CONSTRUCT AND OPERATE
STATIONARY SOURCE PERMIT TO OPERATE

This permit supersedes your permit dated December 18, 2018

In compliance with the Federal Clean Air Act and the Commonwealth of Virginia Regulations for the Control and Abatement of Air Pollution,

Mundet Roslyn Converters, Inc.
P.O. Box 70
Colonial Heights, VA 23834
Registration No.: 50833

is authorized to operate

a Printing Facility

located at

1106 West Roslyn Road, Colonial Heights, VA

in accordance with the Conditions of this permit document.

Approved on DRAFT.

_____

James E. Kyle, P.E.
Air Permit Manager

Permit consists of 13 pages.
Permit Conditions 1 to 51.

INTRODUCTION

This permit document is based on and combines the terms and conditions with 9VAC5-80-1255 from the following permit approval and the respective permit application:

- The NSR permit application dated January 9, 2025, including amendment information dated February 6, 2025, February 14, 2025, February 16, 2025, February 19, 2025, March 18, 2025, April 14, 2025, May 9, 2025, May 13, 2025, and May 16, 2025.

- The state operating permit dated December 18, 2018 based on permit applications dated August 22, 2018, February 26, 2010, July 16, 2009, January 3, 2007, June 5, 2006, December 19, 2005, including amendment information dated February 3, 2006 and August 3, 2006, and supplemental information dated January 24, 2008, November 13, 2007, September 14, 2007, August 21, 2007, July 13, 2007, March 28, 2007, December 1, 2006, July 12, 2006, March 13, 2006, and March 3, 2006.

Any changes in the permit application specifications or any existing facilities which alter the impact of the facility on air quality may require a permit. Failure to obtain such a permit prior to construction may result in enforcement action. In addition, this facility may be subject to additional applicable requirements not listed in this permit document.

Words or terms used in this permit shall have meanings as provided in 9 VAC 5-10-10 of the State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution. The regulatory reference or authority for each condition is listed in parentheses () after each condition. The enabling permit program, or permit programs is provided below each permit condition in the regulatory authority parenthetical as follows: 9VAC5-80-850 for Article 5 and 9VAC5-80-1180 for Article 6. The most recent effective date for a term or condition is listed in brackets [ ]. When identical conditions for one or more emission units are combined, the effective date listed in this permit does not alter the prior effective date(s) for any such conditions as issued in a previous permit action. In accordance with 9VAC5-80-1120F, any condition not marked as state-only enforceable (SOE) is state and federally enforceable.

Annual requirements to fulfill legal obligations to maintain current stationary source emissions data will necessitate a prompt response by the permittee to requests by the Department of Environmental Quality (DEQ) for information to include, as appropriate: process and production data; changes in control equipment; and operating schedules. Such requests for information from the DEQ will either be in writing or by personal contact.

The availability of information submitted to the DEQ or the Board will be governed by applicable provisions of the Freedom of Information Act, §§ 2.2-3700 through 2.2-3714 of the Code of Virginia, § 10.1-1314 (addressing information provided to the DEQ) of the Code of Virginia, and 9 VAC 5-170-60 of the State Air Pollution Control Board Regulations. Information provided to federal officials is subject to appropriate federal law and regulations governing confidentiality of such information.

Equipment List - Equipment at this facility covered by this permit document consists of the following:

Equipment to be constructed subject to Article 6 permitting:

Reference No.	Equipment Description	Rated Capacity	Federal Requirements
CO-01	One 2 coating station rotogravure press with a web-width of 65.34 inches used for solvent coating	495 ft/minute 1,092.49 lbs VOC/hr	MACT Subpart KK

Equipment to be constructed subject to other permitting:

Reference No.	Equipment Description	Rated Capacity	Federal Requirements
DR-01	Natural gas-fired drying oven associated with CO-01.	1 MMBTU/hr per burner. Total of 5 burners for 5 MMBTU/hr	--
DR-02	Natural gas-fired oven associated with CO-01	1 MMBtu/hr per burner. Total of 5 burners for 5 MMBTU/hr	--

Equipment currently subject to Article 6 permitting:

Reference No.	Equipment Description	Rated Capacity	Federal Requirements
P10	One 8-color station rotogravure printing press with a web-width of 40 inches used for cigarette tipping	2,000 ft/minute 455.24 lbs VOC/hr	MACT Subpart KK
P11	One 6-color station rotogravure printing press with a web-width of 48 inches used for cigarette tipping	2,000 ft/minute 474.24 lbs VOC/hr	MACT Subpart KK
PW1	Renzmann type Roto II distillation unit and parts washer, type 300, size 22	--	--
T1	Capital Iron Works unpainted indoor fixed roof solvent storage tank	8330 gallons	--
T2	Capital Iron Works unpainted indoor fixed roof solvent storage tank	8330 gallons	--

Equipment currently subject to other permitting:

Reference No.	Equipment Description	Rated Capacity	Federal Requirements
H1	Natural gas-fired Fulton fluid heater	6.0 MMBtu/hr input	--
H2	Natural gas-fired Fulton fluid heater	6.0 MMBtu/hr input	--
HC1-24	Twenty four natural gas-fired Modine space heaters (ceiling-mounted)	0.05 MMBtu/hr each input	--
HWT	Hand wash tank	50 gallons	--
mPW	Maintenance parts washer		--
LP	Laser perforator	--	--
EP1	Electrostatic perforator	--	--
EP2	Electrostatic perforator	--	--
BG	Paper trimming collection system	--	--
--	Roll grinder (impression rolls 10 and 11)	--	--

Equipment removed from site:

Reference No.	Equipment Description	Rated Capacity	Federal Requirements
P9	One 2-color station rotogravure printing press with a web-width of 48 inches used for cigarette tipping	2,000 ft/minute 412.38 lbs VOC/hr	MACT Subpart KK

Specifications included in the above tables are for informational purposes only and do not form enforceable terms or conditions of the permit.

PROCESS REQUIREMENTS

1. **Emission Controls and Control Efficiency -** Volatile organic compound (VOC) emissions from the (P10) eight (8) station Rotomec rotogravure printing press, the (CO-01) two (2) station rotogravure solvent coater, and the (P11) six (6) station Rotomec rotogravure printing press shall be controlled by a permanent total enclosure and either (Unit 1 or Unit 2) regenerative thermal oxidizer (RTO), each one with a destruction efficiency of 97.5 percent. Each regenerative thermal oxidizer shall be provided with adequate access for inspection.
(9 VAC 5-80-850, 9 VAC 5-50-260 and 9 VAC 5-80-1180) [DRAFT]

2. **Emission Controls and Control Efficiency** - Volatile organic compound (VOC) emissions from the Renzmann Type Roto II Distillation Unit and Parts Washer Type 300 size 22 (PW1) shall be controlled by maintaining a 100 percent capture efficiency and either (Unit 1 or Unit 2) regenerative thermal oxidizer (RTO), each one with a destruction efficiency of 97.5 percent. Each regenerative thermal oxidizer shall be provided with adequate access for inspection.
(9 VAC 5-80-850, 9 VAC 5-50-260 and 9 VAC 5-80-1180) [DRAFT]

3. **Emission Controls -** Volatile organic compound (VOC) emissions from the solvent storage tanks (T1 & T2) shall be controlled by the use of (indoor) fixed roof storage tanks.
(9 VAC 5-80-850, 9 VAC 5-80-1180 and 5-50-260) [December 18, 2018]

4. **Emission Controls** - Volatile organic compound (VOC) emissions from the 50-gallon hand wash tank (HWT) and the maintenance parts washer (mPW) shall be controlled by meeting the requirements of Rule 4-24 (Emission Standards for Solvent Metal Cleaning Operations Using Non-Halogenated Solvents).
(9 VAC 5-80-850) [December 18, 2018]

5. **Emission Controls** - Particulate emissions from the laser and electrostatic perforators (LP, EP1, and EP2) shall be controlled by a wet scrubber. The laser and electrostatic perforators shall be provided with adequate access for inspection.
(9 VAC 5-80-850) [December 18, 2018]

6. **Emission Controls** - Particulate emissions from the paper trimming collection system (BG) shall be controlled by a baghouse. The baghouse shall be provided with adequate access for inspection.
(9 VAC 5-80-850) [December 18, 2018]

7. **Control Parameters and Monitoring Devices** - Each of the thermal oxidizers (Unit 1 and Unit 2) shall maintain a minimum combustion zone temperature of 1400ºF and a residence time of 1 second. Each thermal oxidizer shall be equipped with a device to continuously measure and record the temperature of the combustion zone (oxidizer chamber temperature). Each monitoring device shall be maintained, calibrated and operated in accordance with approved procedures; which shall include, as a minimum, the manufacturer's written requirements or recommendations. Each monitoring device shall be provided with adequate

access for inspection and shall be in operation when each associated regenerative thermal oxidizer is operating.
(9 VAC 5-80-850 and 9 VAC 5-80-1180) [DRAFT]

8. **Permanent Total Enclosure** - The permanent total enclosure shall meet the following criteria:

   a. Any natural draft openings shall be at least 4 equivalent opening diameters from each VOC emitting point;

   b. The total area of all natural draft openings shall not exceed 5 percent of the surface area of the enclosure's four walls, floor and ceiling;

   c. The average facial velocity of air through the natural draft openings shall be at least 200 feet per minute and the direction of flow shall be into the enclosure.

   d. All access doors and windows shall be closed during routine operation of the presses.

   (9 VAC 5-80-850 and 9 VAC 5-80-1180) [DRAFT]

9. **100% Capture Efficiency** – In order to maintain the 100% capture efficiency, the vent system serving the parts washer and distillation unit (PW1) shall maintain a negative pressure at minimum of 0.1 inches of water at all times when the parts washer and distillation unit (PW1) are in operation (e.g., during loading, operation, and unloading of the parts washer).
(9 VAC 5-80-850, 9 VAC 5-50-260 and 9 VAC 5-80-1180) [December 18, 2018]

10. **Monitoring –** Monitoring of the average facial velocity of a minimum of 200 ft/min, which corresponds to a pressure drop of 0.013 mm of Hg or 0.007 in. of H2O as required for a permanent total enclosure designation, shall be demonstrated by a differential pressure meter across the permanent total enclosure. The differential pressure meter records shall be recorded and reviewed once per shift. In addition, verification of direction of air flow is inward shall be verified by a negative pressure which shall be recorded once per shift.
(9 VAC 5-80-1180 and 9VAC 5-80-850) [DRAFT]

11. **Monitoring** – Monitoring of the negative pressure for the vent system serving the parts washer and distillation unit (PW1) as required for the 100% capture efficiency designation shall be demonstrated by a fan failure monitor which is connected to an audible alarm system that also registers on the control panel. If the fan failure alarm occurs due to one fan being inoperable for the associated oxidizer (Unit 1 or Unit 2), the emissions shall be automatically redirected to the remaining operating oxidizer (Unit 1 or Unit 2). If the fan failure occurs due to the remaining fan being inoperable, the system shall automatically shut down along with the printing presses ceasing operation as quickly as safety allows. Records shall be kept of the date and time the alarm occurred and the immediate corrective actions taken.
(9 VAC 5-80-850, 9 VAC 5-50-260 and 9 VAC 5-80-1180) [DRAFT]

12. **Monitoring** – Mundet Roslyn Converters, Inc. may determine the volatile organic compound (VOC) content of materials based on formulation data, and may rely on volatile organic compound (VOC) content data provided by material suppliers. In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40

CFR part 60, appendix A, the applicable test method shall govern, unless after consultation, Mundet Roslyn Converters, Inc. can demonstrate to the satisfaction of the Department that the formulation data is correct.
(9 VAC 5-80-850 and 9 VAC 5-80-1180) [December 18, 2018]

13. **Monitoring** – Mundet Roslyn Converters, Inc. may determine the HAP content of each raw material present in the formulation by Method 311 of appendix A of 40 CFR part 63, or by an alternate method approved by the Department, or by reliance on a certified product data sheet (CPDS) from a raw material supplier. Each CPDS shall include all HAP present at a level greater than 0.1 percent in any raw material used, weighted by the mass fraction of each raw material used in the material. In the event that the Method 311 (of appendix A of 40 CFR part 63) test data is found to be higher than formulation data, the Method 311 test data shall govern, unless an owner or operator demonstrates to the satisfaction of the Department that the formulation data is correct.
(9 VAC 5-80-850 and 9 VAC 5-80-1180) [December 18, 2018]

14. **Certified Product Data Sheet (CPDS)** – Certified Product Data Sheet (CPDS) shall be defined as the following:
Documentation furnished by suppliers of inks, coatings, varnishes, adhesives, primers, solvents, and other materials or by an outside laboratory that provides the organic HAP content of these materials, by weight, measured using Method 311 of appendix A of 40 CFR Part 63 or an equivalent or alternative method (or formulation data as provided in 40 CFR 63.827(b)) and the solids content of these materials, by weight, determined in accordance with 40 CFR 63.827(c).
(9 VAC 5-80-1180) [December 18, 2018]

OPERATING/EMISSION LIMITATIONS

15. **Throughput** - The throughput of VOC to the eight (8) station press (P10) shall not exceed 455.24 pounds per hour and 1,003.33 tons per year, calculated monthly as the sum of each consecutive 12 month period.
(9 VAC 5-80-1180 and 9 VAC 5-80-850) [DRAFT]

16. **Throughput** - The throughput of VOC to the two (2) station rotogravure solvent coater (CO-01) shall not exceed 0.52 pounds per hour and 2.27 tons per year calculated monthly as the sum of each consecutive 12 month period.
(9 VAC 5-80-1180, 9 VAC 5-50-260, and 9 VAC 5-80-850) [DRAFT]

17. **Throughput** - The throughput of VOC to the six (6) station press (P11) shall not exceed 474.24 pounds per hour and 1,073.28 tons per year calculated monthly as the sum of each consecutive 12 month period.
(9 VAC 5-80-1180 and 9 VAC 5-80-850) [DRAFT]

18. **Throughput** - The throughput of VOC to the Renzmann Type Roto II Distillation Unit and Parts Washer Type 300 size 22 (PW1) (includes cleanup) shall not exceed 93.1 tons per year, calculated monthly as the sum of each consecutive 12 month period.
(9 VAC 5-80-850, 9 VAC 5-50-260 and 9 VAC 5-80-1180) [December 18, 2018]

19. **Throughput** - The throughput of VOC to the 50-gallon hand wash tank (HWT) shall not exceed 29.4 tons per year, calculated monthly as the sum of each consecutive 12 month period.
(9 VAC 5-80-850) [December 18, 2018]

20. **Throughput** - The throughput of VOC to the maintenance parts washer (mPW) shall not exceed 0.6 tons per year, calculated monthly as the sum of each consecutive 12 month period.
(9 VAC 5-80-850) [December 18, 2018]

21. **Throughput** - The throughput of VOC solvent to each (indoor) fixed roof solvent storage tank (T1 & T2) shall not exceed 264,000 gallons per year of solvent for a combined total of 528,000 gallons per year, calculated monthly as the sum of each consecutive 12 month period.
(9 VAC 5-80-1180 and 9 VAC 5-80-850) [DRAFT]

22. **Processing** - The rubber grinding of impression rolls for lines 10 and 11 (combined) shall not exceed 196 impression rolls per year, calculated monthly as the sum of each consecutive 12 month period.
(9 VAC 5-80-1180 and 9 VAC 5-80-850) [DRAFT]

23. **Fuel** - The approved fuel for the RTO burners, Fulton Fluid Heaters (H1, H2) Modine Space Heaters (HC1-24) and drying ovens (DR-01, DR-02) is natural gas. A change in the fuel may require a permit to modify and operate.
(9 VAC 5-80-850) [DRAFT]

24. **Fuel Consumption** – The facility (which includes Fulton Fluid Heaters (H1, H2), Modine Space Heaters (HC1-24), the RTO burners, and drying ovens (DR-01, DR-02)) shall consume no more than 58.0×10^6 cubic feet of natural gas per year (combined), calculated monthly as the sum of each consecutive 12 month period.
(9 VAC 5-80-850) [DRAFT]

25. **Fuel** - The natural gas shall meet the specifications below:

    NATURAL GAS: Minimum heat content 1,000 Btu/cf HHV.
    (9 VAC 5-80-850) [DRAFT]

26. **Emission Limits** - Emissions from the operation of the distillation unit and parts washer (PW1) shall not exceed the limits specified below:

Volatile Organic Compounds	2.0 lbs/hr	2.4 tons/yr

    These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits may be considered credible evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in Conditions, 2, 7, 9, 11, and 18.
    (9 VAC 5-80-850, 9 VAC 5-80-1180, and 9 VAC 5-50-260) [December 18, 2018]

27. **Emission Limits** - Emissions from the operation of the 50 gallon hand wash tank (HWT) shall not exceed the limits specified below:

Volatile Organic Compounds		4.4 tons/yr

(9 VAC 5-80-850) [December 18, 2018]

28. **Emission Limits** - Emissions from the operation of the eight (8) station press (P10) shall not exceed the limits specified below:

Volatile Organic Compounds	11.4 lbs/hr	25.1 tons/yr
	5.99 lbs/gal coatings as applied	

(9 VAC 5-80-1180 and 9 VAC 5-80-850) [DRAFT]

29. **Emission Limits** - Emissions from the operation of the two (2) station rotogravure solvent coater (CO-01) shall not exceed the limits specified below:

Volatile Organic Compounds	0.01 lbs/hr	0.06 tons/yr
	7.53 lbs/gal coatings as applied	

These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits may be considered credible evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in Conditions, 1, 7, 8, and 16.

(9 VAC 5-80-1180, 9 VAC 5-50-260, and 9 VAC 5-80-850) [DRAFT]

30. **Emission Limits** - Emissions from the operation of the six (6) station press (P11) shall not exceed the limits specified below:

Volatile Organic Compounds	11.9 lbs/hr	26.8 tons/yr
	6.24 lbs/gal coatings as applied	

(9 VAC 5-80-1180 and 9 VAC 5-80-850) [DRAFT]

31. **Plantwide Emission Limits** - Total emissions from the facility shall not exceed the limits specified below:

Particulate Matter	2.3 lbs/hr	2.8 tons/yr
PM-10	2.3 lbs/hr	2.8 tons/yr
Nitrogen Oxides (as NO_2)	5.5 lbs/hr	2.9 tons/yr
Carbon Monoxide	4.6 lbs/hr	2.4 tons/yr
Volatile Organic Compounds	154.8 lbs/hr	59.3 tons/yr

These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits may be considered credible evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in Conditions, 1, 2,3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, and 25.

(9 VAC 5-80-1180, 9 VAC 5-50-260, and 9 VAC 5-80-850) [DRAFT]

32. **Emission Limits** - Hazardous air pollutant (HAP) emissions, as defined by §112(b) of the Clean Air Act, from the facility shall not exceed 9.9 tons per year of any individual HAP or 24.9 tons per year of any combination, calculated monthly as the sum of each consecutive 12 month period. HAPs which are not accompanied by a specific CAS number as listed in Attachment A shall be calculated as the sum of all compounds containing the named chemical when determining compliance with the individual HAP emissions limitation of 9.9 tons per year.
(9 VAC 5-80-850) [December 18, 2018]

33. **Visible Emission Limit** - Visible emissions from each regenerative thermal oxidizer's stack (RTO) (Unit 1 and Unit 2) shall not exceed 5 percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 30 percent opacity as determined by the EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except during startup, shutdown, and malfunction.
(9 VAC 5-80-850, 9 VAC 5-50-260, 9 VAC 5-50-80 and 9 VAC 5-50-20) [DRAFT]

34. **Visible Emission Limit** - Visible emissions from the laser perforator (LP) and the paper trimming collection system (BG) shall not exceed 20 percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 30 percent opacity as determined by the EPA Method 9 (reference 40 CFR 60, Appendix A).
(9 VAC 5-80-850) [December 18, 2018]

35. **Emissions Venting** – The permittee shall vent emissions from the paper trimming collection system (BG) inside the facility.
(9 VAC 5-80-850) [December 18, 2018]

36. **Emission Unit Reactivation** – The permittee shall not reactivate the removed 2-color station rotogravure printing press (P9) unless a permit is obtained for the unit's reactivation.
(9 VAC 5-80-1180 D and 9 VAC 5-80-850) [DRAFT]

37. **Emission Unit HAP Content** – The coating products used by the (CO-01) two (2) station rotogravure solvent coater shall contain no hazardous air pollutants (HAPs) as defined by §112(b) of the Clean Air Act. Usage of coating products containing a HAP may require a permit.
(9 VAC 5-80-1180 D and 9 VAC 5-80-850) [DRAFT]

RECORDS

38. **On Site Records** - The permittee shall maintain records of emission data and operating parameters as necessary to demonstrate compliance with this permit. The content and format

of such records shall be arranged with the Piedmont Region. These records shall include, but are not limited to:

a. Annual hours of operation of each of the laser and electrostatic perforators (LP, EP1, and EP2), calculated monthly as the sum of each consecutive 12 month period.

b. Annual hours of operation of the paper trimming collection system (BG), calculated monthly as the sum of each consecutive 12 month period.

c. Annual consumption of natural gas by the facility, calculated monthly as the sum of each consecutive 12 month period.

d. Annual throughput of VOCs to the eight (8) station press (P10), calculated monthly as the sum of each consecutive 12 month period.

e. Annual throughput of VOCs to the two (2) station rotogravure solvent coater (CO-01), calculated monthly as the sum of each consecutive 12 month period.

f. Annual throughput of VOCs to the six (6) station press (P11), calculated monthly as the sum of each consecutive 12 month period.

g. Annual throughput of VOC solvent to the storage tanks (T1 & 2), calculated monthly as the sum of each consecutive 12 month period.

h. Annual throughput of VOC to the distillation unit and parts washer (PW1), calculated monthly as the sum of each consecutive 12 month period.

i. Annual throughput of VOC to the 50 gallon rinse tank (HWT), calculated monthly as the sum of each consecutive 12 month period.

j. Annual throughput of VOC to the press parts washer (mPW), calculated monthly as the sum of each consecutive 12 month period.

k. Number of impression rolls processed (rubber grinding), calculated monthly as the sum of each consecutive 12 month period.

l. Monthly and annual emissions to verify compliance with the individual and total toxic compound emission limitations in Condition 32. Annual emissions shall be calculated monthly as the sum of each consecutive 12 month period.

m. Records shall be kept demonstrating the VOC content and HAP content of each coating material and solvents used in the facility. Acceptable records to demonstrate VOC and HAP content shall be as described in Conditions 12, 13, 14, and 39.

n. Operation and control device monitoring records for the regenerative thermal oxidizers.

o. Monitoring records of the differential pressure meter.

These records shall be available for inspection by the DEQ and shall be current for the most recent five years.
(9 VAC 5-80-1180, 9 VAC 5-80-900 and 9 VAC 5-50-50) [DRAFT]

39. **Testing** – The facility shall test at any time using appropriate EPA Test Methods at the request of the Department of Environmental Quality, to determine if the coatings and solvent used at the facility meet the VOC and HAP limitations.
(9 VAC 5-80-850 and 9 VAC 5-80-1180) [DRAFT]

40. **Emission Testing** - The printing facility shall be constructed so as to allow for emissions testing upon reasonable notice at any time, using appropriate methods. Sampling ports shall be provided when requested at the appropriate locations and safe sampling platforms and access shall be provided.
(9 VAC 5-80-850 and 9 VAC 5-80-880) [DRAFT]

NOTIFICATIONS

41. **Initial Notifications** - The permittee shall furnish written notification to the Piedmont Regional Office of:

    a. The actual date on which construction of CO-01, DR-01, and DR-02 commenced within 30 days after such date;

    b. The actual start-up date of CO-01, DR-01, and DR-02 within 15 days after such date;

    (9 VAC 5-50-50 and 9 VAC 5-80-1180) [DRAFT]

GENERAL CONDITIONS

42. **Permit Invalidation** - The permit approval dated [DRAFT] to construct CO-01, DR-01, and DR-02 shall become invalid, unless an extension is granted by the DEQ, if;

    a. A program of continuous construction is not commenced by [18 months + DRAFT].

    b. A program of construction is discontinued for a period of 18 months or more, or is not completed within a reasonable time, except for a DEQ approved period between phases of the phased construction of a new stationary source or project.

    (9 VAC 5-80-1210) [DRAFT]

43. **Permit Suspension/Revocation** – This permit may be suspended or revoked if the permittee:

    a. Knowingly makes material misstatements in the permit application or any amendments to it;

    b. Fails to comply with the conditions of this permit;

    c. Fails to comply with any emission standards applicable to a permitted emissions unit;

d. Cause emissions from the stationary source which result in violations of, or interfere with the attainment and maintenance of, any ambient air quality standard;

e. Fails to operate in conformance with any applicable control strategy, including any emission standards or emissions limitations, in the State Implementation Plan in effect at the time an application for this permit is submitted; or

f. Fails to comply with the applicable provisions of Articles 6, 8, and 9 of 9 VAC 5 Chapter 80.

(9 VAC 5-80-1010) [DRAFT]

44. **Right of Entry** - The permittee shall allow authorized local, state, and federal representatives, upon the presentation of credentials:

a. To enter upon the permittee's premises on which the facility is located or in which any records are required to be kept under the terms and conditions of this permit;

b. To have access to and copy at reasonable times any records required to be kept under the terms and conditions of this permit or the State Air Pollution Control Board Regulations;

c. To inspect at reasonable times any facility, equipment, or process subject to the terms and conditions of this permit or the State Air Pollution Control Board Regulations; and

d. To sample or test at reasonable times.

For purposes of this condition, the time for inspection shall be deemed reasonable during regular business hours or whenever the facility is in operation. Nothing contained herein shall make an inspection time unreasonable during an emergency.
(9 VAC 5-170-130, 9 VAC 5-80-1180 and 9 VAC 5-80-850) [DRAFT]

45. **Notification for Facility or Control Equipment Malfunction** - The permittee shall furnish notification to the Piedmont Region of malfunctions of the affected facility or related air pollution control equipment that may cause excess emissions for more than one hour. Such notification shall be made no later than four daytime business hours after the malfunction is discovered. The permittee shall provide a written statement giving all pertinent facts, including the estimated duration of the breakdown, within 14 days of discovery of the malfunction. When the condition causing the failure or malfunction has been corrected and the equipment is again in operation, the permittee shall notify the Piedmont Region in writing.
(9 VAC 5-20-180 C, 9 VAC 5-80-1180 and 9 VAC 5-80-850) [DRAFT]

46. **Record of Malfunctions** - The permittee shall maintain records of the occurrence and duration of any bypass, malfunction, shutdown or failure of the facility or its associated air pollution control equipment that results in excess emissions for more than one hour. Records shall include the date, time, duration, description (emission unit, pollutant affected, cause), corrective action, preventive measures taken and name of person generating the record..
(9 VAC 5-20-180 J, 9 VAC 5-80-1180 D and 9 VAC 5-80-850) [DRAFT]

47. **Violation of Ambient Air Quality Standard** - The permittee shall, upon request of the DEQ, reduce the level of operation or shut down a facility, as necessary to avoid violating any primary ambient air quality standard and shall not return to normal operation until such time as the ambient air quality standard will not be violated.
(9 VAC 5-20-180 I, 9 VAC 5-80-1180 and 9 VAC 5-80-850) [DRAFT]

48. **Maintenance/Operating Procedures** – At all times, including periods of start-up, shutdown, and malfunction, the permittee shall, to the extent practicable, maintain and operate the affected source, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions.

    The permittee shall take the following measures in order to minimize the duration and frequency of excess emissions, with respect to air pollution control equipment and process equipment which affect such emissions:

    a. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance.

    b. Maintain an inventory of spare parts.

    c. Have available written operating procedures for equipment. These procedures shall be based on the manufacturer's recommendations, at a minimum.

    d. Train operators in the proper operation of all such equipment and familiarize the operators with the written operating procedures, prior to their first operation of such equipment. The permittee shall maintain records of the training provided including the names of trainees, the date of training and the nature of the training.

    Records of maintenance and training shall be maintained on site for a period of five years and shall be made available to DEQ personnel upon request.
    (9 VAC 5-50-20 E, 9 VAC 5-80-1180 D and 9 VAC 5-80-850) [DRAFT]

49. **Violation of Ambient Air Quality Standard** - The permittee shall, upon request of the DEQ, reduce the level of operation or shut down a facility, as necessary to avoid violating any primary ambient air quality standard and shall not return to normal operation until such time as the ambient air quality standard will not be violated.
(9 VAC 5-20-180 I, 9 VAC 5-80-1180 and 9 VAC 5-80-850) [DRAFT]

50. **Change of Ownership** - In the case of a transfer of ownership of a stationary source, the new owner shall abide by any current permit issued to the previous owner. The new owner shall notify the Piedmont Region of the change of ownership within 30 days of the transfer.
(9 VAC 5-80-1240 and 9 VAC 5-80-940) [DRAFT]

51. **Permit Copy** - The permittee shall keep a copy of this permit on the premises of the facility to which it applies.
(9 VAC 5-80-1180 and 9 VAC 5-80-860 D) [DRAFT]

Attachment A - Priority Pollutants

CAS Number	Chemical Name
75070	Acetaldehyde
60355	Acetamide
75058	Acetonitrile
98862	Acetophenone
53963	2-Acetylaminofluorene
107028	Acrolein
79061	Acrylamide
79107	Acrylic acid
107131	Acrylonitrile
107051	Allyl chloride
92671	4-Aminobiphenyl
62533	Aniline
90040	0-Anisidine
71432	Benzene (including benzene from gasoline)
92875	Benzidine
98077	Benzotrichloride
100447	Benzyl chloride
92524	Biphenyl
117817	Bis (2-ethylhexyl)phthalate (DEHP)
542881	Bis (chloromethyl) ether
75252	Bromoform
106990	1,3-Butadiene
156627	Calcium cyanamide
133062	Captan
63252	Carbaryl
75150	Carbon disulfide
56235	Carbon tetrachloride
463581	Carbonyl sulfide
120809	Catechol
133904	Chloramben
57749	Chlordan
7782505	Chlorine
79118	Chloroacetic acid
532274	2-Chloroacetophenone
108907	Chlorobenzene
510156	Chlorobenzilate
67663	Chloroform
107302	Chloromethyl methylether
126998	Chloroprene
1319773	Cresols/Cresylic acid (isomers and mixture)
95487	o-Cresol
108394	m-Cresol
106445	p-Cresol
98828	Cumene
94757	2,4-D, salts and esters
3547044	DDE
334883	Diazomethane
132649	Dibenzofurans
96128	1,2-Dibromo-3-chloropropane
84742	Dibutylphthalate

CAS Number	Chemical Name
106467	1,4-Dichlorobenzene(p)
91941	3,3-Dichlorobenzidene
111444	Dichloroethyl ether (Bis(2-chloroethyl)ether)
542756	1,3-Dichloropropene
62737	Dichlorvos
111422	Diethanolamine
121697	N,N-Diethyl aniline (N,N-Dimethylaniline)
64675	Diethyl sulfate
119904	3,3-Dimethoxybenzidine
60117	Dimethyl aminoazobenzene
119937	3,3-Dimethyl benzidine
79447	Dimethyl carbamoyl chloride
68122	Dimethyl formamide
57147	1,1-Dimethyl hydrazine
131113	Dimethyl phthalate
77781	Dimethyl sulfate
534521	4,6-Dinitro-o-cresol, and salts
51285	2,4-Dinitrophenol
121142	2,4-Dinitrotoluene
123911	1,4-Dioxane (1,4 Diethyleneoxide)
122667	1,2-Diphenylhydrazine
106898	Epichlorohydrin (1-Chloro-2,3-epoxypropane)
106887	1,2-Epoxybutane
140885	Ethyl acrylate
100414	Ethyl benzene
51796	Ethyl carbamate (Urethane)
75003	Ethyl chloride (Chloroethane)
106934	Ethylene dibromide (Dibromoethane)
107062	Ethylene dichloride (1,2-Dichloroethane)
107211	Ethylene glycol
151564	Ethylene imine (Aziridine)
75218	Ethylene oxide
96457	Ethylene thiourea
75343	Ethylidene dichloride (1,1-Dichloroethane)
50000	Formaldehyde
76448	Heptachlor
118741	Hexachlorobenzene
87683	Hexachlorobutadiene
77474	Hexachlorocyclopentadiene
67721	Hexachloroethane
822060	Hexamethylene-1,6-diisocyanate
680319	Hexamethylphosphoramide
110543	Hexane
302012	Hydrazine
7647010	Hydrochloric acid
7664393	Hydrogen fluoride (Hydrofluoric acid)
123319	Hydroquinone
78591	Isophorone
58899	Lindane (all isomers)
108316	Maleic anhydride
67561	Methanol
72435	Methoxychlor

CAS Number	Chemical Name
74839	Methyl bromide (Bromomethane)
74873	Methyl chloride (Chloromethane)
71556	Methyl chloroform (1,1,1-Trichloroethane)
78933	Methyl ethyl ketone (2-Butanone)
60344	Methyl hydrazine
74884	Methyl iodide (Iodomethane)
108101	Methyl isobutyl ketone (Hexone)
624839	Methyl isocyanate
80626	Methyl methacrylate
1634044	Methyl tert butyl ether
101144	4,4-Methylene bis(2-chloroaniline)
75092	Methylene chloride (Dichloromethane)
101688	Methylene diphenyl diisocyanate (MDI)
101779	4,4-Methylenedianiline
91203	Naphthalene
98953	Nitrobenzene
92933	4-Nitrobiphenyl
100027	4-Nitrophenol
79469	2-Nitropropane
684935	N-Nitroso-N-methylurea
62759	N-Nitrosodimethylamine
59892	N-Nitrosomorpholine
56382	Parathion
82688	Pentachloronitrobenzene (Quintobenzene)
87865	Pentachlorophenol
108952	Phenol
106503	p-Phenylenediamine
75445	Phosgene
7803512	Phosphine
7723140	Phosphorus
85449	Phthalic anhydride
1336363	Polychlorinated biphenyls (Aroclors)
1120714	1,3-Propane sultone
57578	beta-Propiolactone
123386	Propionaldehyde
114261	Propoxur (Baygon)
78875	Popylene dichloride(1,2 Dichloropropane)
75569	Propylene oxide
75558	1,2-Propylenimine (2-Methyl aziridine)
91225	Quinoline
106514	Quinone
100425	Styrene
96093	Styrene oxide
1746016	2,3,7,8-Tetrachlorodibenzo-p-dioxin
79345	1,1,2,2-Tetrachloroethane
127184	Tetrachloroethylene (Perchloroethylene)
7550450	Titanium tetrachloride
108883	Toluene
95807	2,4-Toluene diamine
584849	2,4-Toluene diisocyanate
95534	o-Toluidine
8001352	Toxaphene (chlorinated camphene)

CAS Number	Chemical Name
120821	1,2,4-Trichlorobenzene
79005	1,1,2-Trichloroethane
79016	Trichloroethylene
95954	2,4,5-Trichlorophenol
88062	2,4,6-Trichlorophenol
121448	Triethylamine
1582098	Trifluralin
540841	2,2,4-Trimethylpentane
108054	Vinyl acetate
593602	Vinyl bromide
75014	Vinyl chloride
75354	Vinylidene chloride (1,1-Dichloroethylene)
1330207	Xylenes (isomers and mixture)
95476	o-Xylenes
108383	m-xylenes
106423	p-Xylenes
0	Antimony Compounds
0	Arsenic Compounds (inorganic including arsine)
0	Beryllium Compounds
0	Cadmium Compounds
0	Chromium Compounds
0	Cobalt Compounds
0	Coke Oven Emissions
0	Cyanide Compounds[1]
0	Glycol ethers[2] with TLVs
0	Lead Compounds
0	Manganese Compounds
0	Mercury Compounds
0	Nickel Compounds
0	Polycylic Organic Matter[3]
0	Selenium Compounds

NOTE:For all listings above which contain the word "compounds" and for the glycol ethers, the following applies: Unless otherwise specified, these listings are defined as including any unique chemical substance that contains the named chemical (i.e., antimony, arsenic, etc.) as part of that chemical's infrastructure.

[1]X'CN where X = H' or any other group where a formal dissociation may occur. For example, KCN or $Ca(CN)_2$

[2]Includes mono- and di-ethers of ethylene glycol, diethylene glycol, and triethylene glycol $R(OCH2CH2)_n$-OR' where

n = 1, 2, or 3

R = alkyl or arylgroups

R' = R, H, or groups which, when removed, yield glycol ethers with the structure: $R(OCH2CH)_n$-OH. Polymers are excluded from the glycol category.

[3]Includes organic compounds with more than one benzene ring, and which have a boiling point greater than or equal to 100˚C.