



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

JOHN ELIAS BALDACCI
GOVERNOR

DAVID P. LITTELL
COMMISSIONER

The Dingley Press, Inc.
Androscoggin County
Lisbon, Maine
A-506-70-L-A

Departmental
Findings of Fact and Order
Part 70 Air Emission License
Amendment #4

After review of the Part 70 License amendment application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 M.R.S.A., §344 and §590, the Department finds the following facts:

I. REGISTRATION

A. Introduction

FACILITY	The Dingley Press, Inc. (Dingley)
PART 70 LICENSE NUMBER	A-506-70-H-R/A
LICENSE TYPE	Part 70 Significant Modification
NAICS CODES	323110
NATURE OF BUSINESS	Commercial Lithographic Printing
FACILITY LOCATION	Lisbon, Maine
PART 70 LICENSE ISSUANCE DATE	October 3, 2006
AMENDMENT ISSUANCE DATE	
LICENSE EXPIRATION DATE	October 3, 2011

B. Amendment Description

The Dingley Press, Inc. (Dingley) amended their New Source Review (NSR) license in amendment A-506-77-1-M to address the following:

Dingley operates Lithographic Printing Press #4. Emissions of VOC and HAP from Press #4 are currently controlled by the Catalytic Incinerator which has a required destruction efficiency of 95%. Dingley wishes to have the flexibility to control emissions from Press #4 by using either the Catalytic Incinerator or the facility's existing Regenerative Thermal Oxidizers (RTOs).

Dingley uses a Wolverine RTO-25,000 regenerative thermal oxidizer (RTO #1) and a TANN Corporation Model TR 2094 regenerative thermal oxidizer (RTO #2) to control VOCs from Presses #3, #5, #6, #7, and #8.

Currently emissions from Presses #3, #5, #6, #7, and #8 can be controlled by either RTO #1 or RTO #2. Each press is assigned a flow rate based on maximum operation. The presses all vent to a common header. When both RTOs are

operating, there is sufficient capacity to control all presses at maximum production. In the event that one of the RTOs goes down, each RTO has programmed interlocks which prohibit presses with a combined total flow rate greater than the RTO design maximum to operate. The interlocks shut down presses based on a preprogrammed priority system. Dingley maintains records which demonstrate which presses are in operation for all periods of time when only one RTO is operating. RTOs #1 and #2 are required to maintain a minimum destruction efficiency of 97.5%.

Dingley has proposed adding Press #4 to the list of presses that can be exhausted to the common header for RTOs #1 and #2. In addition, Dingley wishes to maintain the flexibility to exhaust Press #4 to the Catalytic Incinerator if they so choose.

Dingley is now requesting that these changes be incorporated into their Part 70 air emission license.

C. Application Classification

The application for Dingley does not violate any applicable federal or state requirements. The Best Available Control Technology (BACT) analysis performed per New Source Review (NSR) was modified per *Major and Minor Source Air Emission License Regulations*, 06-096 CMR 115 (last amended December 1, 2005) in air emission license minor revision A-506-77-1-M. This action incorporates the changes of these NSR amendments into Dingley's Part 70 license and is therefore determined to be a Part 70 Significant Modification and has been processed as such.

D. Facility Emissions

Dingley shall be restricted to the following annual emissions, based on a 12 month rolling total:

Total Licensed Annual Emission for the Facility
Tons/year
(used to calculate the annual license fee)

	PM	PM ₁₀	SO ₂	NO _x	CO	VOC	Single HAP	Total HAP
Catalytic Incinerator	0.4	0.4	0.1	9.4	2.4	--	--	--
RTO #1	1.3	1.3	1.3	13.6	17.1	--	--	--
RTO #2	0.5	0.5	0.1	12.3	5.1	--	--	--
Air Handling Units	1.3	1.3	0.1	2.6	2.2	--	--	--
Facility Wide Limit	--	--	--	--	--	94.4	9.9	24.9
Total TPY	3.5	3.5	1.6	37.9	26.8	94.4	9.9	24.9

ORDER

Based on the above Findings and subject to conditions listed below, the Department concludes that emissions from this sources:

- will receive Best Practical Treatment;
- will not violate applicable emissions standards
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants the Part 70 License A-506-70-L-A pursuant to 06-096 CMR 140 and the preconstruction permitting requirements of 06-096 CMR 115 and subject to the standard and special conditions below.

All federally enforceable and State-only enforceable conditions in existing air licenses previously issued to Dingley pursuant to the Department's preconstruction permitting requirements in 06-096 CMR 108 or 115 have been incorporated into this Part 70 license, except for such conditions that MEDEP has determined are obsolete, extraneous or otherwise environmentally insignificant, as explained in the findings of fact accompanying this permit. As such the conditions in this license supercede all previously issued air license conditions.

Federally enforceable conditions in this Part 70 license must be changed pursuant to the applicable requirements in 06-096 CMR 115 for making such changes and pursuant to the applicable requirements in 06-096 CMR 140.

For each standard and special condition which is state enforceable only, state-only enforceability is designated with the following statement: **Enforceable by State-only.**

Severability. The invalidity or unenforceability of any provision, or part thereof, of this License shall not affect the remainder of the provision or any other provisions. This License shall be construed and enforced in all respects as if such invalid or unenforceable provision or part thereof had been omitted.

The following shall replace Condition (15)(C) of Air Emission License A-506-70-H-R/A:

- C. Emissions from the dryers on Press #4 shall be controlled by either the catalytic incinerator or the thermal oxidizers. Dingley shall keep records of all operating hours for Press #4 and which control device was being utilized.
[A-506-77-1-M]

The following shall replace Condition (15)(E) of Air Emission Licenses A-506-70-H-R/A and A-506-70-K-A:

- E. The Catalytic Incinerator shall achieve no less than 95% destruction of VOCs. Compliance shall be demonstrated by stack testing by December 31, 2009 and once every two years thereafter unless the Catalytic Incinerator has operated for less than 720 hours since December 31 of the last year tested. In which case, stack testing shall be performed within 60 days of exceeding 720 hours of Catalytic Incinerator operation since December 31 of the last year tested.
[A-506-77-1-M]

The following shall replace Condition (15)(J) of Air Emission License A-506-70-H-R/A:

- J. RTO #1 and RTO #2 shall each achieve no less than 97.5% destruction of VOC based on 1000 ppmv or higher VOC inlet measured as propane at actual air stream conditions. If the inlet VOC content is below 1000 ppmv, the VOC outlet shall not exceed 25 ppmv at actual stack conditions. Dingley shall demonstrate compliance with the destruction efficiency for RTO #1 and RTO #2 by stack testing each by December 31, 2009 and once every two years thereafter. After two sets of successful compliance demonstrations, Dingley may apply to reduce the frequency of stack testing required.
[A-506-77-1-M]

The following shall replace Condition (20) of Air Emission License A-506-70-H-R/A:

(20) **Monitoring and Recordkeeping Requirements**
[06-096 CMR 140, BPT]

A. The following are identified as Periodic Monitors:

1. Facility natural gas fuel use.
2. Chamber temperature for the catalytic incinerator, RTO #1, and RTO #2.
3. Date and time of all downtime for RTO #1 and RTO #2.
4. Which presses are in operation during all periods of downtime for RTO#1 and RTO#2.
5. Maximum design flow rate for all presses in operation during all periods of downtime for RTO #1 and RTO #2.
6. Amount of ink, fountain solution, and blanket wash used in both the printing and inkjet/video jet operations.
7. VOC and HAP content of the ink, fountain solution, and blanket wash used.
8. Record keeping as required by 06-096 CMR 130 for the parts washer.
9. Records of all operating times for Press #4 and which control device was being utilized for control of emissions.
10. Records of all operating hours for the Catalytic Incinerator.

B. The following are identified as CAM monitors [40 CFR Part 64]:

1. Chamber temperature for the catalytic incinerator, RTO #1, and RTO #2.
2. Maximum design flow rate from the presses to the RTOs.

The following shall replace Condition (24) of Air Emission License A-506-70-H-R/A:

(24) **Annual Emission Statement**

In accordance with *Emission* Statements, 06-096 CMR 137 (last amended November 8, 2008), the licensee shall annually report to the Department the information necessary to accurately update the State's emission inventory by means of:

- A. A computer program and accompanying instructions supplied by the Department; or
- B. A written emission statement containing the information required in 06-096 CMR 137.

The emission statement must be submitted by the date as specified in 06-096 CMR 137.

[06-096 CMR 137]

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Condition (25) of Air Emission License A-506-70-H-R/A is deleted.

Condition (30) of Air Emission License A-506-70-H-R/A is deleted.

DONE AND DATED IN AUGUSTA, MAINE THIS *23rd* DAY OF *March*, 2010.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: *James P. Little*

DAVID P. LITTELE, COMMISSIONER

The term of this amendment shall be concurrent with the term of Air Emission License A-506-70-H-R/A.

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 10/23/09
Date of application acceptance: 10/23/09

Date filed with the Board of Environmental Protection:

This Order prepared by Lynn Ross, Bureau of Air Quality.

