Example Streamlining Analysis for Packaging Rotogravure Facility

The example facility operates a packaging rotogravure press. The press is located in a press room. The press room is vented to an oxidizer. The press installation was authorized through new source review. The press uses solvent based inks, some of the solvents are HAPs. In the title V permit, the facility wishes to streamline three different applicable requirements that apply to the press.

Comparison of Applicable Requirements - The applicable requirements that apply to our example printing facility include the following:

State SIP/RACT Requirement for Graphic Arts - at least 65% overall control of VOC emissions and 90% destruction by oxidizer. Compliance is determined by compliance test using methods in State testing procedures manual. Continuous monitoring of emissions is required in accordance with State monitoring procedures manual.

- **NSR Permit** - 100% capture of emissions based on use of a permanent total enclosure and 96% destruction by oxidizer to control VOC, toluene, and hexane emissions. Initial compliance test is required using Reference Methods including 25/25A. Capture test based on Reference Method 204 is required. Continuous monitoring and recording of combustion zone temperature is also required. Continuous monitoring of capture is based on negative pressure or linear velocity. Daily record must be kept of negative pressure or linear velocity reading. Compliance is determined based on the average hourly temperature data.
- **Subpart KK Requirements** - Facility chose to comply with the standard by operating a capture system and control device and demonstrating an overall organic HAP control efficiency of at least 95 percent for each month [63.825(b)(7)]. Use of oxidizer requires initial compliance test for both capture and control based on Reference Methods including 25/25A and Method T (Method 204) [63.825(d)(1)(i) and (ii)]. Continuous monitoring and recording of oxidizer temperature and a parameter for capture is required [63.825(d)(1)(x)]. Capture monitoring is based on required capture efficiency monitoring plan [63.828(a)(5)]. In this example the facility plan is based on monitoring negative pressure. Compliance is based on the average temperature for each three-hour period [63.825(d)(1)(xi)].

Determine Most Stringent Limit - In this example, the NSR limit and the subpart KK limit are more stringent than the RACT limits. The NSR requirement for 100% capture and 96% control for VOC and the two HAPs is more stringent than the subpart KK requirement for 95% overall control efficiency of HAPs. The test requirements are essentially the same. Maintaining the combustion temperature based on a one-hour average as required by the NSR limit is more stringent than based on a three-hour average under subpart KK.

Hypothetical Streamlined Set of Requirements

The streamlined set of requirements in this example could be:

- 100 percent capture and 96 percent control of VOC and HAP emissions (basis: NSR Permit)
- Initial compliance test for capture and control efficiency using Reference Test Methods (basis: NSR Permit and subpart KK)
- Compliance based on maintaining hourly average of temperature parameter value from performance test (basis: NSR permit)
- Continuous monitoring and recording of permanent total enclosure negative pressure and oxidizer combustion temperature (basis: subpart KK)

Conditions would be drafted for the title V permit that would prescribe the streamlined set of requirements and include citations for each of the applicable requirements streamlined [see 40 CFR § 70.6(a)(1)].