

COUNTY OF



ALLEGHENY

RICH FITZGERALD
COUNTY EXECUTIVE

August 5, 2013

Ms. Joyce Epps, Director
Department of Environmental Protection
Bureau of Air Quality
Rachel Carson Building
400 Market Street, P.O. Box 8468
Harrisburg, PA 17105-8468

Dear Ms. Epps:

Enclosed are a paper copy and an exact duplicate of this paper copy on a computer disk in searchable pdf file format of a revision to Allegheny County's portion of the Pennsylvania State Implementation Plan for the Attainment and Maintenance of the 8-Hour Ozone National Ambient Air Quality Standards. Changes made to Article XXI, Air Pollution Control Rules and Regulations, and County Ordinance 16782 are related to regulations incorporating CTGs for **Offset Lithographic Printing and Letterpress Printing; Flexible Packaging Printing; and Industrial Solvent Cleaning Operations** - Sections 2105.80, 2105.81, and 2105.82 respectively, as well as existing Graphic Arts Systems regulations at Section 2105.11. This SIP revision is being tracked as our internal Revision 68.

This SIP Revision was the subject of a public comment period from July 20, 2010 until August 20, 2010 the date of the public hearing. It was approved by the Board of Health on May 4, 2011, enacted by County Council on May 22, 2013, approved and signed by the Allegheny County Chief Executive on May 29, 2013, and became effective June 8, 2013.

We request that the Pennsylvania Department of Environmental Protection approve this revision and forward the paper copy and disk to the U.S. EPA Region III with a recommendation for approval. If you have any questions, please call me at the number below or email me at jthompson@achd.net.

Sincerely,

James Thompson, Manager
Air Quality Program

cc: Kirit Dalal
Stephen Hepler

Enclosures

**Revision to ALLEGHENY COUNTY'S portion of the
PENNSYLVANIA STATE IMPLEMENTATION PLAN**

For the

**Attainment and Maintenance of the National
Ambient Air Quality Standards**

Revision Tracking No. 68

**Allegheny County Health Department
Rules and Regulations
Article XXI, Air Pollution Control**

Changes to Article XXI Sections in the SIP:

**§2105.11 Graphic Arts Systems,
§2105.80 Control of VOC Emissions from Offset Lithographic Printing and
Letterpress Printing,
§2105.81 Control of VOC Emissions from Flexible Package Printing, and
§2105.82 Control of VOC Emissions from Industrial Solvent Cleaning Operations**

Table of Contents

1. Changes to Article XXI Rules and Regulations:
 - §2105.11, Graphic Arts Systems (SIP Change);**
 - §2105.80, Control of VOC Emissions from Offset Lithographic Printing and Letterpress Printing (SIP Change);**
 - §2105.81, Control of VOC Emissions from Flexible Package Printing (SIP Change);**
 - §2105.82, Control of VOC Emissions from Industrial Solvent Cleaning Operations (SIP Change)**

2. Technical Support Document

3. Documentation of Public Hearing and Certifications
 - Public hearing notice
 - Transmittals of hearing notice to EPA & PA DEP
 - Proof of publication of notice of hearing
 - Certification of hearing
 - Summary of Comments and responses
 - Certification of approval and adoption

1. Article XXI Changes

<p style="text-align: center;"><u>ALL NEW TEXT</u></p>

§ 2105.80 CONTROL OF VOC EMISSIONS FROM OFFSET LITHOGRAPHIC PRINTING AND LETTERPRESS PRINTING

- a. **Applicability.** Beginning January 1, 2012, this section applies to the owner or operator of an offset lithographic printing and/or letterpress printing operation, where the total actual VOC emissions from all offset lithographic printing and letterpress printing operations, with two exceptions, including related cleaning activities, at that facility are equal to or greater than 15 pounds (6.8 kilograms) per day or 2.7 tons (2,455 kilograms) per twelve month rolling period. These exceptions include heatset web offset lithographic printing operations and heatset web letterpress printing operations, for which this section only applies to those presses with potential to emit from the dryer, prior to controls, of at least 25 tons (22,680 kilograms) of VOC (petroleum ink oil) from heatset inks per twelve month rolling period.
- b. **Limitations.** A person may not cause or permit the emission into the outdoor atmosphere of VOCs from an offset lithographic printing and/or letterpress printing operation unless one of the following limitations is met:
1. The VOC content for heatset web offset lithographic printing contains 1.6 percent alcohol or less (by weight), on-press (as-applied) in the fountain or the following equivalents:
 - A. 3.0 percent alcohol or less (by weight) on-press (as-applied) in the fountain solution provided the fountain solution is refrigerated to below 60°F (15.5°C); or
 - B. 5.0 percent alcohol substitute or less (by weight) on-press (as-applied) and no alcohol in the fountain solution.
 2. The VOC content for sheet-fed offset lithographic printing contains 5.0 percent alcohol or less (by weight), in the fountain or the following equivalents:
 - A. 8.5 percent alcohol or less (by weight) on-press (as-applied) in the fountain solution provided the fountain solution is refrigerated to below 60°F (15.5°C); or
 - B. 5.0 percent alcohol substitute or less (by weight) on-press (as-applied) and no alcohol in the fountain solution.

3. The VOC content for cold web lithographic printing contains 5.0 percent alcohol substitute or less (by weight) on-press (as-applied) and no alcohol in the fountain solution.
 4. The overall weight of VOC emitted to the atmosphere is reduced through the use of a chiller condenser or an oxidizer for heatset web offset lithographic printing or heatset web letterpress printing as follows:
 - A. The overall control efficiency for a chiller condenser shall be no less than 90 percent; or
 - B. The overall control efficiency for an oxidizer shall be no less than 95 percent; or
 - C. VOC outlet concentration is reduced to less than 20 ppmv on a dry basis.
 5. Use cleaning materials with a VOC composite vapor pressure less than 10mm Hg at 68°F (20°C) or cleaning materials containing less than 70 weight percent VOC. The cleaning materials apply to blanket washing, roller washing, plate cleaners, metering roller cleaners, impression cylinder cleaners, rubber rejuvenators, and other cleaners used for cleaning a press, press parts, or to remove dried ink from the areas around a press. The cleaning materials provided do not apply to cleaners used on electric components of a press, pre-press cleaning operations, post-press operations, cleaning supplies used to clean the floor, other than dried ink, in the area around a press, or cleaning performed in parts washers or cold cleaners.
 6. A combination of the methods listed in Paragraphs 1 through 5.
- c. **Records.** A facility, regardless of the facility's annual emission rate, which contains offset lithographic printing and/or letterpress printing operations, shall maintain records sufficient to demonstrate compliance with this section. At a minimum, a facility shall maintain daily records of:
1. The following parameters for each ink and other component as supplied:
 - A. The name and identification number of each ink, or component;
 - B. The volume used;
 - C. The total volume of all the inks used in the offset lithographic printing and letterpress printing operation;
 - D. The mix ratio;
 - E. The density or specific gravity;
 - F. If used, the temperature of the fountain solution.

The records shall be maintained for 2 years and shall be submitted to the Department on a schedule reasonably prescribed by the Department.

- d. **Exempt Solvents.** The solvents methyl chloroform (1,1,1-trichloroethane) and methylene chloride are exempt from control under this Section. No offset lithographic printing operation or letterpress printing operation which seeks to comply with this Section through the use of an exempt solvent may be included in any alternative standard approved pursuant to this Article.

- e. **Exempt Other.** The following shall be exempt from the limitations set by Subsection b:
 - 1. Sheet-feed presses with sheet size of 11 inches (27.9 centimeters) by 17 inches (43.2 centimeters) or smaller, or to any sheet-feed press with total fountain solution reservoir of less than one gallon (3.8 liters).
 - 2. Heatset presses used for book printing or heatset presses with maximum web width of 22 inches (55.9 centimeters) or less are excluded from the add-on control of either a chiller condenser or an oxidizer.
 - 3. 110 gallons (416 liters) per year of cleaning materials, or less, which meet neither the low VOC composite vapor pressure limitation nor the lower VOC content limitation and work practices.

- f. **Housekeeping.** The following work practices for cleaning materials apply to the owner or operator of an offset lithographic printing and letterpress printing operation:
 - 1. Store all VOC-containing cleaning materials and used shop towels in closed containers.
 - 2. Ensure that ink, fountain solution and cleaning material storage containers are kept closed at all times except when depositing or removing those materials.
 - 3. Minimize spills of VOC-containing inks, fountain solutions and cleaning materials, cleaning up spills immediately.
 - 4. Convey VOC-containing inks, fountain solutions and cleaning materials from one location to another in closed containers or pipes.
 - 5. Minimize VOC emissions during cleaning of storage and conveying equipment.

- g. **Measurements.** Measurements of the volatile fraction of inks and fountain solution, and of volatile organic compound emissions shall be performed according to the applicable procedures established in § 2107.04 of this Article.

***NEW TEXT in
BOLD and ITALIC***

§ 2105.11 GRAPHIC ARTS SYSTEMS

- a. This Section applies to sources whose rotogravure and flexographic printing presses in themselves, or in combination with any surface coating operations subject to the provisions of Section 2105.10 of this Article (relating to Surface Coating Processes), have a potential uncontrolled emission rate of 1000 pounds or more per day or 100 tons or more per year of volatile organic compounds, including emissions from solvents used for clean up and purging. No person shall operate, or allow to be operated, any source to which this Section applies, unless one of the following emission limitations is met:
1. The volatile fraction of the ink, as applied to the substrate, contains 25.0 percent by volume or less of VOC and 75.0 percent by volume or more of water;
 2. The ink, as applied to the substrate, contains 60.0 percent by volume or more of solid material; or
 3. There is in operation a carbon adsorption system, an incinerator system, or an alternate volatile organic compound emission control system which recovers or destroys at least 90 percent by weight of the volatile organic compounds entering the system.
- b. Any person who seeks to comply with the requirements of this Section through the installation and operation of an emission control system as provided by Paragraph a.3 above shall operate such emission control system in conjunction with an emission capture system which is designed and operated consistent with good engineering practice and which achieves a contemporaneous, overall reduction in volatile organic compound emissions from each ink/press of at least:
1. 75.0 percent from publication rotogravure processes;
 2. 65.0 percent from other rotogravure processes; and,
 3. 60.0 percent from flexographic printing processes.
- c. Presses which are used only to check the quality of the image formation of newly etched or engraved printing cylinders are exempted from this Section provided the aggregate emissions from the presses do not exceed 400 pounds in any 30 day running period.

d. **Exempt Solvents.**

The solvents methyl chloroform (1,1,1-trichloroethane) and methylene chloride are exempt from control under this Section. No graphic arts process which seeks to comply with this Section through the use of an exempt solvent may be included in any alternative standard approved pursuant to this Article.

e. **Measurements.**

Measurements of the volatile fraction of inks and of volatile organic compound emissions shall be performed according to the applicable procedures established in § 2107.04 of this Article.

f. ***Exempt Other.***

The owner or operator of a flexible package printing press subject to § 2105.81 CONTROL OF VOC EMISSIONS FROM FLEXIBLE PACKAGE PRINTING, is no longer subject to all subparagraphs of § 2105.11 GRAPHIC ARTS SYSTEMS, and shall be subject to all subparagraphs of § 2105.81 CONTROL OF VOC EMISSIONS FROM FLEXIBLE PACKAGE PRINTING as of January 1, 2012.

ALL NEW TEXT

§ 2105.81 CONTROL OF VOC EMISSIONS FROM FLEXIBLE PACKAGE PRINTING

- a. **Applicability.** Beginning January 1, 2012, this section applies to the owner or operator of a flexible packaging printing press, including rotogravure printing and flexographic printing, where the total actual VOC emissions from all flexible package printing press operations, including related cleaning activities, at the facility are equal to or greater than 15 pounds (6.8 kilograms) per day or 2.7 tons (2,455 kilograms) per twelve month rolling period.
 1. The limits from § 2105.11 Graphic Arts System no longer apply to flexible package printing presses, as of January 1, 2012.

- b. **Limitations.** A person may not cause or permit the emission into the outdoor atmosphere of VOCs from a flexible package printing press unless one of the following limitations is met:
 1. The overall control efficiency shall be no less than 80 percent.
 2. The VOC content of materials (inks, coatings and adhesives) used on a single press shall not be greater than 0.8 lb VOC per lb solids applied.
 3. The VOC content of materials (inks, coatings and adhesives) used on a single press shall not be greater than 0.16 lb VOC per lb materials applied.

- c. **Records.** A facility, regardless of the facility's annual emission rate, which contains a flexible package printing press, shall maintain records sufficient to demonstrate compliance with this section. At a minimum, a facility shall maintain daily records of:
 1. The following parameters for each material, ink, coating, adhesive and other component as supplied:
 - A. The name and identification number of each material, ink, coating and adhesive;
 - B. The volume used;
 - C. The mix ratio;
 - D. The density or specific gravity;
 - E. The weight percent of total volatiles, water, solids, and exempt solvents;
 - F. The VOC content of the materials (inks, coatings and adhesives) used on a single press per weight of solids or materials applied.

The records shall be maintained for 2 years and shall be submitted to the Department on a schedule reasonably prescribed by the Department.

- d. **Exempt Solvents.** The solvents methyl chloroform (1,1,1-trichloroethane) and methylene chloride are exempt from control under this Section. No flexible package printing operation which seeks to comply with this Section through the use of an exempt solvent may be included in any alternative standard approved pursuant to this Article.
- e. **Housekeeping.** The following work practices for cleaning materials apply to the owner or operator of a flexible printing press:
 - 1. Store all VOC-containing cleaning materials and used shop towels in closed containers.
 - 2. Ensure that ink, coating, adhesive and cleaning material storage containers are kept closed at all times except when depositing or removing those materials.
 - 3. Minimize spills of VOC-containing inks, coatings, adhesives and cleaning materials, cleaning up spills immediately.
 - 4. Convey VOC-containing inks, coatings, adhesives and cleaning materials from one location to another in closed containers or pipes.
 - 5. Minimize VOC emissions during cleaning of storage and conveying equipment.
- f. **Measurements.** Measurements of the volatile fraction of inks, and of volatile organic compound emissions shall be performed according to the applicable procedures established in § 2107.04 of this Article.

ALL NEW TEXT

**§ 2105.82 CONTROL OF VOC EMISSIONS FROM INDUSTRIAL SOLVENT
CLEANING OPERATIONS**

- a. **Applicability.** Beginning January 1, 2012, this section applies to the owner or operator of a facility, where the total actual VOC emissions from all of the industrial solvent cleaning operations at that facility are equal to or greater than 15 pounds (6.8 kilograms) per day or 2.7 tons (2,455 kilograms) per twelve month rolling period. This regulation applies to any facility that employs solvent materials in industrial solvent cleaning operations during the production, repair, maintenance, or servicing of parts, products, tools, machinery, equipment, or general work areas, and stores and/or disposes of these solvent materials.

The provisions of this rule shall not apply to cleaning operations in the following source categories listed for regulation under Section 183(e) of the Clean Air Act:

1. Aerospace coatings;
 2. Wood furniture coatings;
 3. Shipbuilding and repair coatings;
 4. Flexible package printing materials;
 5. Lithographic printing materials;
 6. Letterpress printing materials;
 7. Flat wood paneling coatings;
 8. Large appliance coatings;
 9. Metal furniture coatings;
 10. Paper, film, and foil coatings;
 11. Plastic parts coatings;
 12. Miscellaneous metal parts coatings;
 13. Fiberglass boat manufacturing materials;
 14. Miscellaneous industrial adhesives; or
 15. Auto and light-duty truck assembly coatings.
- b. **Limitations.** A person may not cause or permit the emission into the outdoor atmosphere of VOCs from industrial solvent cleaning operations unless one of the following limitations is met:
1. The solvent complies with the applicable VOC Content Limitation Table 2105.82;

2. The owner or operator of a facility that is subject to this rule shall employ only the following cleaning devices and methods:
 - A. Wipe cleaning;
 - B. Closed containers or hand held spray bottles from which solvents are applied without a propellant-induced force;
 - C. Cleaning equipment which has a solvent container that can be and is closed during cleaning operations, except when depositing and removing objects to be cleaned, and is closed during non-operation with the exception of maintenance and repair to the cleaning equipment itself;
 - D. Remote reservoir cleaner, if the operator of the cleaner complies with all of the following:
 - i. Prevents solvent vapors from escaping from the solvent container by using such devices as a cover or a valve when the remote reservoir is not being used, cleaned or repaired.
 - ii. Directs solvent flow in a manner that will prevent liquid solvent from splashing outside of the remote reservoir cleaner.
 - iii. Does not clean porous or absorbent materials, such as cloth, leather, wood or rope.
 - iv. Uses only solvent containers free of all liquid leaks. Auxiliary equipment, such as pumps, pipelines or flanges, shall not have any liquid leaks, visible tears or cracks. Any liquid leak, visible tear or crack detected shall be repaired within one calendar day, or the leaking section of the remote reservoir cold cleaner shall be drained of all solvent and shut down until it is replaced or repaired.
 - E. Non-atomized solvent flow method where the cleaning solvent is collected in a container or a collection system which is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container; or
 - F. Solvent flushing method where the cleaning solvent is discharged into a container which is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container. The discharged solvent from the equipment must be collected into containers without atomizing into the open air. The solvent may be flushed through the system by air or hydraulic pressure or by pumping.

3. The owner or operator of a facility that is subject to this rule is prohibited from atomizing any solvent unless the emissions are vented to VOC emission control equipment that meet the requirements of Paragraph b.5 of this rule.
 4. All VOC containing solvents used in solvent cleaning operations shall be stored in non-absorbent, non-leaking containers which shall be kept closed at all times except when filling or emptying. Cloth and paper moistened with VOC containing solvents shall be stored in closed, non-absorbent, non-leaking containers.
 5. In lieu of complying with the requirements of Paragraphs b.1 and b.2 of this rule for an industrial solvent cleaning operation, the owner or operator of a facility that is subject to this rule may comply with this rule by installing and operating VOC emission control equipment for the industrial solvent cleaning operation. The VOC emission control equipment shall comply with all of the following requirements:
 - A. A capture efficiency of at least 90 percent, by weight, for the VOC emissions.
 - B. Either a destruction/removal efficiency of at least 95 percent, by weight, for the VOC emissions, or an outlet concentration of less than 20 ppmv, on a dry basis, for the VOC emissions.
 7. In lieu of complying with the requirements in Paragraph b.1 of this rule, the owner or operator of a facility may use solvents or solvent solutions for industrial cleaning operations which have a VOC composite partial vapor pressure of less than or equal to 8mm of Hg at 68°F (20°C).
- c. **Records.** A facility, regardless of the facility's annual emission rate, which is subject to any of the VOC content limitations specified in this rule, shall maintain records sufficient to demonstrate compliance with this section. At a minimum, a facility shall maintain daily records of:
1. The following parameters for each industrial solvent cleaner and other component as supplied:
 - A. The name and identification number of each industrial solvent cleaning material and the associated industrial cleaning activity;
 - B. The volume of each solvent used in the industrial solvent cleaning operation;
 - C. The total volume of all the solvents used in the industrial solvent cleaning operation;
 - D. The mix ratio;
 - E. The density or specific gravity;

- F. The VOC content, based upon applicable procedures established in § 2107.04 of this Article, of each industrial solvent cleaning material, as employed or the VOC composite partial vapor pressures of the solvents or solvent solutions used in the industrial solvent cleaning operation.
- 2. The VOC content of each industrial solvent cleaner as supplied.
- 3. The VOC content of each industrial solvent cleaner as applied.

The records shall be maintained for 2 years and shall be submitted to the Department on a schedule reasonably prescribed by the Department.

- d. **Exempt Solvents.** The solvents methyl chloroform (1,1,1-trichloroethane) and methylene chloride are exempt from control under this Section. No industrial solvent cleaning operation which seeks to comply with this Section through the use of an exempt solvent may be included in any alternative standard approved pursuant to this Article.
- e. **Exempt Other.** The following industrial solvent cleaning operations shall be exempt from the limitations set by Subsection b:
 - 1. The following industrial solvent cleaning operations are exempt from all the requirements of this rule:
 - A. Janitorial cleaning, including graffiti removal.
 - B. Stripping of cured coatings, cured ink, or cured adhesives.
 - C. Cleaning operations in printing pre-press or graphic arts pre-press areas, including the cleaning of film processors, color scanners, plate processors, film cleaning and plate cleaning.
 - 2. The following industrial solvent cleaning operations are exempt from the VOC content limitations specified in Paragraph b.1 of this rule:
 - A. Cleaning of solar cells, laser hardware, scientific instruments and high precision optics.
 - B. Cleaning conducted as part of the following: performance laboratory tests on coatings, adhesives or inks; research and development programs; and laboratory tests in quality assurance laboratories.
 - C. Cleaning of paper-based gaskets and clutch assemblies where rubber is bonded to metal by means of an adhesive.
 - D. Cleaning of cotton swabs to remove cottonseed oil before cleaning of high precision optics.
 - E. Medical device and pharmaceutical facilities using up to 1.5 gallons (5.7 Liters) per day of solvents.
 - F. Cleaning of adhesive application equipment used for thin metal laminating.
 - G. Cleaning of electronic or electronic cables.

- H. Touch-up cleaning performed on printed circuit boards where surface mounted devices have already been attached.
 - I. Cleaning of coating and adhesive application processes utilized to manufacture transdermal drug delivery product using less than three gallons per day of ethyl acetate.
 - J. Cleaning of application equipment used to apply coatings on satellites and radiation effect coatings.
 - K. Cleaning of application equipment used to apply solvent borne fluoropolymer coatings.
 - L. Cleaning of ultraviolet or electron beam adhesive application.
 - M. Cleaning of sterilization indicating ink application equipment if the facility employs less than 1.5 gallons (5.7 Liters) per day of solvents for such cleaning.
 - N. Cleaning of metering rollers, dampening rollers and printing plates.
 - O. Cleaning of polyester resin application equipment for sources subject to 40 CFR Part 63, Subpart WWWW.
3. The following industrial solvent cleaning operations are exempt from the requirements of Paragraph b.3 of this rule:
- A. Cleaning of the nozzle tips of automated spray equipment systems, except for robotic systems.
 - B. Cleaning with spray bottles or containers described in Subparagraph b.2.B of this rule.
 - C. Printing operations where the roller shall be exempt from the requirements of Paragraphs b.1 and b.3 of this rule if the facility employs 1.25 gallons [one hundred sixty fluid ounces (4.7 Liters)] or less of the aerosol products per day.
- f. **Housekeeping.** The following work practices for cleaning materials apply to the owner or operator of an industrial solvent cleaning operation:
- 1. Store all VOC-containing cleaning materials and used shop towels in closed containers.
 - 2. Ensure that mixing and storage containers used for industrial solvent cleaning operations are kept closed at all times except when depositing or removing those materials.
 - 3. Minimize spills of VOC-containing industrial solvent cleaners, and cleaning materials, cleaning up spills immediately.
 - 4. Convey VOC-containing industrial solvent cleaners and cleaning materials from one location to another in closed containers or pipes.
 - 5. Minimize VOC emissions during cleaning of storage and conveying equipment.

- g. **Measurements.** Measurements of the volatile fraction of industrial solvent cleaners, and of volatile organic compound emissions shall be performed according to the applicable procedures established in § 2107.04 of this Article.

Table 2105.82
Emission Limits of VOCs for Industrial Solvent Cleaning Operations

	<u>Industrial Solvent Cleaning Operation</u>	<u>VOC Content Limitation as employed</u>	
		<u>lbs VOC per gal</u>	<u>kg VOC per liter</u>
1.	Product cleaning during manufacturing process or surface preparation for coating, adhesive, or ink application		
	(a) General	0.42	0.050
	(b) Electrical apparatus components and electronic components	0.83	0.099
	(c) Medical devices and pharmaceuticals	6.7	0.80
2.	Repair and maintenance cleaning		
	(a) General	0.42	0.050
	(b) Electrical apparatus components and electronic components	0.83	0.099
	(c) Medical devices and pharmaceuticals		
	(i) Tools, equipment and machinery	6.7	0.80
	(ii) General work surfaces	5.0	0.60
3.	Cleaning of coating or adhesive	0.42	0.050
4.	Cleaning of ink application equipment:		
	(a) General	0.42	0.050
	(b) Flexographic printing	0.42	0.050
	(c) Gravure printing		
	(i) Publication	0.83	0.099
	(ii) Packaging	0.42	0.050
	(d) Screen printing	4.2	0.50
	(e) Ultraviolet ink and electron beam ink application equipment, except screen printing	4.2	0.50
	(f) Specialty flexographic printing	0.83	0.099
5.	Cleaning of polyester resin application equipment not subject to 40 CRF Part 63 Subpart WWWW	0.42	0.050

2. Technical Support Document

Summary of Change

The changes to these sections of Article XXI add three Control Techniques Guidelines (CTG) categories as three regulations. Changes were also made to an existing regulation, adding subsection f. Exempt Other.

§2105.11, Graphic Arts Systems (SIP Change);
§2105.80 Control of VOC Emissions from Offset Lithographic Printing and Letterpress Printing (SIP Change);
§2105.81 Control of VOC Emissions from Flexible Package Printing (SIP Change);
§2105.82 Control of VOC Emissions from Industrial Solvent Cleaning Operations (SIP Change)

The CTG categories for Offset Lithographic Printing and Letterpress Printing, Flexible Package Printing, and Industrial Cleaning Solvents were issued by the EPA in 2006. The EPA has mandated that these CTGs become regulations, written by Local or State Air Pollution Control Agencies.

The regulation changes to section **§2105.11**, and the addition of regulations **§2105.80**, **§2105.81** and **§2105.82** to Article XXI constitute a change to the Allegheny County portion of the Pennsylvania State Implementation Plan (SIP) for the control of ozone with respect to those sections.

3. Documentation of Public Hearing and Certifications

Notice of Public Hearing

Transmittals of hearing notice to EPA & PA DEP

Proof of publication of notice of hearing

Certification of hearing

Summary of Comments and responses

Certification of approval and adoption

NOTICE OF PUBLIC HEARING
FOR PROPOSED AMENDMENTS TO
ALLEGHENY COUNTY HEALTH DEPARTMENT RULES AND REGULATIONS
ARTICLE XXI, AIR POLLUTION CONTROL

The Allegheny County Board of Health will hold a public hearing on **Friday, August 20, 2010**, at **10:00 AM**, Building #7 First Floor Conference Room, Clack Health Center, 301 39th Street, Pittsburgh, PA 15201 to take testimony on the following proposed modifications to Allegheny County Health Department Article XXI and County Ordinance 16782:

Revision to or addition of the following Article XXI sections as they relate to Control Techniques Guidelines:

§2105.11, Graphic Arts Systems;

§2105.80, Control of VOC Emissions from Offset Lithographic Printing and Letterpress Printing;

§2105.81, Control of VOC Emissions from Flexible Package Printing;

§2105.82, Control of VOC Emissions from Industrial Solvent Cleaning Operations.

The proposed changes to §2105.11 and the additional regulations §2105.80, §2105.81, §2105.82, will be incorporated as a revision to Allegheny County's portion of the Pennsylvania State Implementation Plan for the control of ozone.

Copies of the proposed amendments may be examined beginning Tuesday, July 20, 2010, at the Allegheny County Law Library, Room 921 City-County Building, Grant Street, Pittsburgh, PA 15219, from 8:30 AM to 5:00 PM; at the Allegheny County Health Department Library, Building 7, Clack Health Center, from 8:30 AM until 3:30 PM Monday thru Friday; on the Allegheny County Health Department web site: www.achd.net; or by calling 412-578-8120 to request a mailed printed copy.

Oral testimony must be pre-scheduled by calling 412-578-8008 no less than 24 hours in advance of the public hearing. Speakers will be limited to five minutes and should bring a written copy of their comments.

The Board will accept written testimony beginning **Tuesday, July 20, 2010**, and concluding **Friday, August 20, 2010**, by mail to:

Board of Health
3333 Forbes Avenue
Pittsburgh, PA 15213
By email to BOH@achd.net
By Fax to 412-578-8325

Allegheny County Health Department

DIRECTOR

Bruce W. Dixon, M.D.



AIR QUALITY PROGRAM

301 39th Street – Bldg. #7
Pittsburgh, PA 15201-1891

Phone: (412) 578-8115
Fax: (412) 578-8144

BOARD OF HEALTH

Paul M. King, Esq., Q.E.P.
Chair

Lee Harrison, M.D.
Vice Chair

Al M. Ahmed, P.E.

Rev. Ricky V. Burgess

Donald S. Burke, M.D.

Hon. Joan Cleary, R.N.

James M. Flynn, Jr.

Lidia C. Turzai, M.D.

William Youngblood

July 14, 2010

Ms. Joyce Epps, Director
Department of Environmental Protection
Bureau of Air Quality
Rachel Carson Building
400 Market Street, P.O. Box 8468
Harrisburg, PA 17105-8468

Dear Ms. Epps:

Enclosed is a Notice of Public Hearing scheduled to occur on August 20, 2010, regarding proposed revisions to the Allegheny County Health Department Rules and Regulations, Article XXI, Air Pollution Control and County Ordinance Number 16782, to revise sections related to Control Techniques Guidelines. The portions of 2105.11 included in the change and sections 2105.80, 2105.81 and 2105.82 will also be submitted as changes to Allegheny County's portion of the Pennsylvania State Implementation Plan.

The SIP revision is being tracked as our Revision Tracking Number 68.

Copies of this notice have also been sent to your Region V Pittsburgh Office for their information and review.

Your comments are welcome.

Sincerely,

/SIGNED/

James Thompson
Manager

cc: Arleen Shulman

Enclosures

- Proposed Article XXI/SIP Revision 68
- Public Hearing Notice

25-093008

Allegheny County Health Department

DIRECTOR

Bruce W. Dixon, M.D.



Ms. Diana Esher, Director
Air Protection Division
Region III (3AP00)
U.S. Environmental Protection Agency
1680 Arch Street
Philadelphia, PA 19103-2029

AIR QUALITY PROGRAM

301 39th Street – Bldg. #7
Pittsburgh, PA 15201-1891

Phone: (412) 578-8115
Fax: (412) 578-8144

July 14, 2010

BOARD OF HEALTH

Paul M. King, Esq., Q.E.P.
Chair

Lee Harrison, M.D.
Vice Chair

Al M. Ahmed, P.E.
Rev. Ricky V. Burgess
Donald S. Burke, M.D.
Hon. Joan Cleary, R.N.
James M. Flynn, Jr.
Lidia C. Turzai, M.D.
William Youngblood

Dear Ms. Esher:

Enclosed is a Notice of Public Hearing scheduled to occur on August 20, 2010, regarding proposed revisions to the Allegheny County Health Department Rules and Regulations, Article XXI, Air Pollution Control and County Ordinance Number 16782, to revise sections related to Control Techniques Guidelines. The portions of 2105.11 included in the change and sections 2105.80, 2105.81 and 2105.82 will also be submitted as changes to Allegheny County's portion of the Pennsylvania State Implementation Plan.

The SIP revision is being tracked as our Revision Tracking Number 68.

Your comments are welcome.

Sincerely,

/SIGNED/

James Thompson
Manager

Enclosures

- Proposed SIP Revision 68
- Public Hearing Notice

Allegheny County Health Department

DIRECTOR

Bruce W. Dixon, M.D.



AIR QUALITY PROGRAM

301 39th Street – Bldg. #7
Pittsburgh, PA 15201-1891

Phone: (412) 578-8115
Fax: (412) 578-8144

BOARD OF HEALTH

Paul M. King, Esq., Q.E.P.
Chair

Lee Harrison, M.D.
Vice Chair

Al M. Ahmed, P.E.
Rev. Ricky V. Burgess
Donald S. Burke, M.D.
Hon. Joan Cleary, R.N.
James M. Flynn, Jr.
Lidia C. Turzai, M.D.
William Youngblood

July 14, 2010

Mr. Mark Wayner
Regional Air Quality Manager
Department of Environmental Protection
Southwest Regional Office – Region V
400 Waterfront Drive
Pittsburgh, PA 15222-4745

Dear Mr. Wayner:

Enclosed is a Notice of Public Hearing scheduled to occur on August 20, 2010, regarding proposed revisions to the Allegheny County Health Department Rules and Regulations, Article XXI, Air Pollution Control and County Ordinance Number 16782, to revise sections related to Control Techniques Guidelines. The portions of 2105.11 included in the change and sections 2105.80, 2105.81 and 2105.82 will also be submitted as changes to Allegheny County's portion of the Pennsylvania State Implementation Plan.

The SIP revision is being tracked as our Revision Tracking Number 68.

Copies of this submittal have been sent to Ms. Joyce Epps in Harrisburg for review.

Your comments are welcome.

Sincerely,

/SIGNED/

James Thompson
Manager

cc: Steve Hepler
Enclosures

- Proposed Article XXI/SIP Revision 68
- Public Hearing Notice

25-093008

No. _____ Term, _____

Proof of Publication of Notice in Pittsburgh Post-Gazette

Under Act No 587, Approved May 16, 1929, PL 1784, as last amended by Act No 409 of September 29, 1951

Commonwealth of Pennsylvania, County of Allegheny, ss C. Mohamed, being duly sworn, deposes and says that the Pittsburgh Post-Gazette, a newspaper of general circulation published in the City of Pittsburgh, County and Commonwealth aforesaid, was established in 1993 by the merging of the Pittsburgh Post-Gazette and Sun-Telegraph and The Pittsburgh Press and the Pittsburgh Post-Gazette and Sun-Telegraph was established in 1960 and the Pittsburgh Post-Gazette was established in 1927 by the merging of the Pittsburgh Gazette established in 1786 and the Pittsburgh Post, established in 1842, since which date the said Pittsburgh Post-Gazette has been regularly issued in said County and that a copy of said printed notice or publication is attached hereto exactly as the same was printed and published in the regular editions and issues of the said Pittsburgh Post-Gazette a newspaper of general circulation on the following dates, viz:

15 of July, 2010

Affiant further deposes that he/she is an agent for the PG Publishing Company, a corporation and publisher of the Pittsburgh Post-Gazette, that, as such agent, affiant is duly authorized to verify the foregoing statement under oath, that affiant is not interested in the subject matter of the afore said notice or publication, and that all allegations in the foregoing statement as to time, place and character of publication are true.

COPY OF NOTICE OR PUBLICATION

NOTICE OF PUBLIC HEARING FOR PROPOSED AMENDMENTS TO ALLEGHENY COUNTY HEALTH DEPARTMENT RULES AND REGULATIONS ARTICLE XXI AIR POLLUTION CONTROL.

The Allegheny County Board of Health will hold a public hearing on Friday, August 20, 2010, at 10:00 AM, Building #7 First Floor Conference Room, Clark Health Center, 301 29th Street, Pittsburgh, PA 15201 to take testimony on the following proposed modifications to Allegheny County Health Department Article XXI and County Ordinance 16782:

Revision to or addition of the following Article XXI sections as they relate to Control Technical Guidelines:

- § 105.11, Graphic arts systems.
- § 105.80, Control of VOC emissions from Offset Lithographic Printing and Letterpress Printing.
- § 105.81, Control of VOC Emissions from Flexible Package Printing.
- § 105.82, Control of VOC Emissions from Industrial Solvent Cleaning Operations.

The proposed changes to § 105.11 and the additional regulations § 105.80, § 105.81, § 105.82, will be incorporated as a revision to Allegheny County's portion of the Pennsylvania State implementation Plan for the control of ozone.

Copies of the proposed amendments may be examined beginning Tuesday, July 20, 2010, at the Allegheny County Law Library, Room 721 City County Building, Grant Street, Pittsburgh, PA 15219, from 8:30 AM to 5:00 PM; at the Allegheny County Health Department Library, Building 7, Clark Health Center, from 8:30 AM to 3:30 PM Monday through Friday, on the Allegheny County Health Department web site: www.achd.net; or by calling 412-578-8120 to request a mailed printed copy.

Oral testimony must be pre-scheduled by calling 412-578-8008 no less than 24 hours in advance of the public hearing. Speakers will be limited to five minutes and should bring a written copy of their comments.

The Board will accept written testimony beginning Tuesday, July 20, 2010, and concluding Friday, August 20, 2010, by mail to:

Board of Health
3333 Forbes Avenue
Pittsburgh, PA 15213
By email to: BOH@achd.net
By Fax to: 412-578-8525

C Mohamed
PG Publishing Company

Sworn to and subscribed before me this day of July 15, 2010

Jinda M. Gaertner
COMMONWEALTH OF PENNSYLVANIA

Notarial Seal
Linda M. Gaertner, Notary Public
City Of Pittsburgh, Allegheny County
My Commission Expires Jan. 31, 2011
Member, Pennsylvania Association of Notaries

RECEIVED
AUG 9 2010

STATEMENT OF ADVERTISING COSTS
ALCTY HEALTH-LEGAL-FORBES AVE
JANET NORKUS
3333 FORBES AVE
PITTSBURGH PA 15213

To PG Publishing Company

Total \$107.10

Publisher's Receipt for Advertising Costs

PG PUBLISHING COMPANY, publisher of the Pittsburgh Post-Gazette, a newspaper of general circulation, hereby acknowledges that it has received the original Proof of Publication and receipt for the Advertising costs in the subject matter of the aforesaid advertising and publication costs and certifies that the same have been fully paid.

PG Publishing Company, a Corporation, Publisher of Pittsburgh Post-Gazette, a Newspaper of General Circulation

By _____

I hereby certify that the original Proof of Publication and receipt for the Advertising costs in the subject matter of said notice.

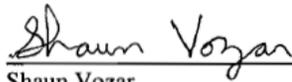
Attorney For

Revision 68

SIP Submittal for Control Techniques Guidelines (CTG)

Certification of Hearing

Shaun Vozar deposes and says that he is an Air Pollution Control Engineer II of the Air Quality Program of the Allegheny County Health Department and hereby certifies that a Public Hearing was held on August 20, 2010 on the proposed amendment to the County's portion of the Pennsylvania State Implementation Plan that would add three regulations to Article XXI; the regulation revisions and SIP amendments address three CTG categories as three regulations: §2105.80 Control of VOC Emissions from Offset Lithographic Printing and Letterpress Printing Processes, §2105.81 Control of VOC Emissions from Flexible Package Printing, and §2105.82 Control of VOC Emissions from Industrial Solvent Cleaning Operations; changes were made to an existing regulation, §2105.11 Graphic Arts Systems, adding subsection f. Exempt Other; that the opportunity for written comments was given in accordance with the requirements of 40 CFR 51.102; that notice of such hearing was given by publication in a newspaper of general circulation on July 15, 2010; and to the best of his knowledge, belief and understanding, such proceedings were in full compliance with all applicable State and Federal laws, regulations, and other requirements.



Shaun Vozar,
Air Pollution Control Engineer II
Air Quality Program
Allegheny County Health Department

9/22/10

Date

**Comment and Response Document for the Proposed SIP Revision 68
Regulation Changes for Ozone Control Techniques Guidelines
August 20, 2010 Public Hearing**

1. Comment: The strike-out of the existing Graphic Arts (GA) system regulation at 2105.11, would cause an existing facility that has publication rotogravure presses, along with other surface coating processes that have a potential to emit greater than or equal to 100 tpy would no longer be regulated because they are not covered by the new flexible package printing regulation, because their product is not flexible packages, it's magazines, or books, or etc.

Commenter: Deborah Wehr, Pennsylvania Department of Environmental Protection

Response: So there is no applicability gap, ACHD will not strike-out the existing Graphic Arts Systems regulation, §2105.11. ACHD will add a clause to §2105.11 Graphic Arts Systems, under new subsection f. Exempt Other. This clause will state that any owner or operator of a flexible package printing press subject to §2105.81 Control of VOC Emissions from Flexible Package Printing, is no longer subject to §2105.11 Graphic Arts Systems, and shall be subject to all subparagraphs of regulation §2105.81 Control of VOC Emissions from Flexible Package Printing as of January 1, 2012.

2. Comment: ACHD needs to change the Applicability Dates of the CTGs to coincide with the PADEP.

Commenter: ACHD

Response: The Applicability Dates were changed from April 1, 2011 to January 1, 2012 to coincide with the PADEP.

CERTIFICATION of APPROVAL and ADOPTION

To the best of my knowledge, information, and belief, I the undersigned hereby certify that the additions of Sections 2105.80, 2105.81 and 2105.82 to, and the amendments to Section 2105.11 of, Article XXI, Rules and Regulations of the Allegheny County Health Department, Air Pollution Control, and Ordinance No. 16782 of the County of Allegheny, adopted by the Allegheny County Board of Health on May 4, 2011, enacted by the Allegheny County Council on May 22, 2013 (Ordinance 14-13-OR), approved by the Allegheny County Chief Executive on May 29, 2013, and effective June 8, 2013, as a revision to the County's Portion of the Pennsylvania State Implementation Plan for the Attainment and Maintenance of the National Ambient Air Quality Standards, were duly and properly enacted as prescribed by the Local Health Administration Law and the Second Class County Charter Law, and as such, are fully and legally enforceable by the Allegheny County Health Department and the County of Allegheny as provided for by the within authority.



Michael A. Parker
Assistant Solicitor
Allegheny County Health Department

COMMONWEALTH OF PENNSYLVANIA)

COUNTY OF ALLEGHENY) S.S.

On the 12 day of July, 2013,

Michael A. Parker personally appeared before me, the undersigned authority, satisfactorily proven to me to be the person whose name appears above, and did in my presence execute the above certification for the purposes contained therein.

WHEREFORE, I have hereunto set my hand and official seal the 12 day of July, 2013.



NOTARY PUBLIC

