# Texas Commission on Environmental Quality



# Form OP-UA22 Printing Attributes

#### General:

This form is used to provide a description and data pertaining to all printing processes with potentially applicable requirements associated with a regulated entity number and application. Each table number, along with the possibility of a corresponding letter (i.e., Table 1a, Table 1b), corresponds to a certain state or federal rule. If the rule on the table is not potentially applicable to a printing process then it should be left blank and need not be submitted with the application. If the codes entered by the applicant show negative applicability to the rule or sections of the rule represented on the table, then the applicant need not complete the remainder of the table(s) that corresponds to the rule. Further instruction as to which questions should be answered and which questions should not be answered are located in the "Specific" section of the instruction text. The following is included in this form:

**Table 1:** Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)

Subpart FFF: Standards of Performance for Flexible Vinyl and Urethane Coating and Printing

**Table 2a - 2c:** Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)

Subpart KK: National Emission Standard for Hazardous Air Pollutants for the Printing and

**Publishing Industry** 

**Table 3:** Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)

Subchapter E: Graphic Arts (Printing) by Rotogravure and Flexographic Processes

**Table 4:** Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)

Subpart E: Offset Lithographic Printing

**Table 5a - 5b:** Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)

Subpart QQ: Standards of Performance for the Graphic Arts Industry: Publication Rotogravure

Printing

The application area name from Form OP-1 "Site Information Summary" must appear in the header of each page for the purpose of identification for the initial submittal. The date of the initial form submittal must also be included and should be consistent throughout the application (MM/DD/YYYY). Leave the permit number blank for the initial form submittal. If this form is included as part of the permit revision process, enter the permit number assigned by the TCEQ, the area name (from Form OP-1), and the date of the revision submittal.

Unit attribute questions that do not require a response from all applicants are preceded by qualification criteria in the instructions. If the unit does not meet the qualification criteria, a response to the question is not required. Anytime a response is not required based on the qualification criteria, leave the space on the form blank.

Notwithstanding any qualification criteria in the form instructions or information provided in other TCEQ guidance, the applicant may leave an attribute question blank (or indicate "N/A" for "Not Applicable") if the attribute is not needed for the applicable requirement determinations of a regulation for a unit.

In some situations, the applicant has the option of selecting alternate requirements, limitations, and/or practices for a unit. Note that these alternate requirements, limitations, and/or practices must have the required approval from the TCEQ Executive Director and/or the U.S. Environmental Protection Agency Administrator before the federal operating permit application is submitted.

The Texas Commission on Environmental Quality (TCEQ) requires that a Core Data Form be submitted on all incoming registrations unless all of the following are met: the Regulated Entity and Customer Reference Numbers have been issued by the TCEQ and no core data information has changed. The Central Registry, a common record area of the TCEQ, maintains information about TCEQ customers and regulated activities, such as company names, addresses, and telephone numbers. This information is commonly referred as "core data." The Central Registry provides the regulated community with a central access point within the agency to check core data and make changes when necessary. When core data about a facility is moved to the Central Registry, two new identification numbers are assigned: the Customer Reference (CN)

number and the Regulated Entity (RN) number. The Core Data Form is required if facility records are not yet part of the Central Registry or if core data for a facility has changed. If this is the initial registration, permit, or license for a facility site, then the Core Data Form must be completed and submitted with application or registration forms. If amending, modifying, or otherwise updating an existing record for a facility site, the Core Data Form is not required, unless any core data information has changed. To review additional information regarding the Central Registry, go to the TCEQ Web site at <a href="https://www.tceq.texas.gov/permitting/central\_registry">www.tceq.texas.gov/permitting/central\_registry</a>.

### **Specific:**

Table 1: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)

Subpart FFF: Standards of Performance for Flexible Vinyl and Urethane Coating and Printing

**Process ID No.:** Enter the identification number (ID No.) for the printing process (maximum 10 characters) as listed on Form OP-SUM, "Individual Unit Summary."

**SOP Index No.:** Site operating permit (SOP) applicants should indicate the SOP index number for the unit or group of units (maximum 15 characters consisting of numeric, alphanumeric characters, and/or dashes prefixed by a code for the applicable regulation [i.e., 60KB-XXXX]). For additional information relating to SOP index numbers, please refer to the TCEQ website at www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title\_V/sop\_initial.pdf.

**Rotogravure Printing Line:** Enter "YES" if the facility uses a rotogravure printing line to print or coat flexible vinyl or urethane products. Otherwise, enter "NO."

## **▼** Continue only if "Rotogravure Printing Line" is "YES."

**Construction/Modification Date:** Select one of the following options that best describes the date of commencement of the most recent construction, reconstruction, or modification. Enter the code on the form.

Code Description

83- On or before January 18, 1983

83+ After January 18, 1983

#### **▼** Continue only if "Construction/Modification Date" is "83+."

**Weighted Average of Ink VOC Content:** Select one of the following options for the weighted average of ink volatile organic compounds (VOC) content. Enter the code on the form.

Code Description

1- Weighted average VOC content is less than 1.0 kg VOC per kg ink solids used

1+ Weighted average VOC content is greater than or equal to 1.0 kg VOC per kg ink solids used

# ★ Complete "Control Types" and "Control Device ID No." only if "Weighted Average of Ink VOC Content" is "1+."

**Control Types:** Select one of the following control types for the affected facility. Enter the code on the form.

Code Description
SOLREC Solvent recovery
THERM Thermal incineration
CATINC Catalytic incineration

**Control Device ID No.:** Enter the identification number (ID No.) for the control device to which emissions are routed (maximum 10 characters). This number should be consistent with the control device identification number listed on Form OP-SUM.

# **★** Complete "Inventory System Used" only if "Weighted Average of Ink VOC Content" is "1-."

**Inventory System Used:** Enter "YES" if an inventory system is used to determine the weighted average of VOC content. Otherwise, enter "NO."

Table 2a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)

**Subpart KK: National Emission Standard for Hazardous Air Pollutants for the Printing and Publishing Industry** 

**Process ID No.:** Enter the identification number (ID No.) for the printing processes (maximum 10 characters) as listed on Form OP-SUM, "Individual Unit Summary."

**SOP Index No.:** Site operating permit (SOP) applicants should indicate the SOP index number for the unit or group of units (maximum 15 characters consisting of numeric, alphanumeric characters, and/or dashes prefixed by a code for the applicable regulation [i.e., 60KB-XXXX]). For additional information relating to SOP index numbers, please refer to the TCEQ website at www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title\_V/sop\_initial.pdf.

**Equipment Type:** Select one of the following facility types. Enter the code on the form.

Code Description

PRINT Publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing

presses operated at a new or existing facility that is a major source of hazardous air pollutants

(HAPs) and are not research or laboratory equipment

RESEAR Research or laboratory equipment or non-wide-web flexographic printing presses

NWWF Non wide-web flexographic printing presses

## **★** Complete "Other Equipment" only if "Equipment Type" is "RESEAR"

**Other Equipment:** Enter "YES" if equipment other than research or laboratory equipment is being used at the facility. Otherwise, enter "NO".

# ▼ Continue only if "Equipment Type" is "PRINT," or if "Equipment Type" is "RESEAR' and "Other Equipment" is "YES."

**Construction/Modification Date:** Select one of the following options that best describes the date of commencement of the most recent construction, reconstruction, or modification. Enter the code on the form.

Code Description

96- Before May 30, 1996 96+ On or after May 30, 1996

**Individual HAP Usage:** Select one of the following options for the usage of each HAP at the facility, including materials used for source categories or purposes other than printing and publishing, but excluding material listed in 40 CFR § 63.820(a)(4). Enter the code on the form.

Code Description

10- The facility uses is less than 9.1 megagrams (10 tons) of each HAP per each rolling

12 month period

10+ The facility uses is greater than or equal to 9.1 megagrams (10 tons) of each HAP per each rolling

12-month period

# ★ Complete "Collective HAP Usage" only if "Individual HAP Usage" is "10-."

**Collective HAP Usage:** Select one of the following options for the usage of any combination of HAPs at the facility, including materials used for source categories or purposes other than printing and publishing, but excluding material listed in 40 CFR § 63.820(a)(4). Enter the code on the form.

Code Description

25- The facility uses is less than 22.7 megagrams (25 tons) of any combination of HAP per each

rolling 12-month period

25+ The facility uses is greater than or equal to 22.7 megagrams (25 tons) of any combination of HAP

per each rolling 12-month period

### ▼ Continue only if "Individual HAP Usage" is "10+" or "Collective HAP Usage" is "25+."

**Press Type:** Select one of the following types of equipment at the facility. Enter the code on the form.

For publication rotogravure presses:

Code Description

PUBLIC The facility has publication rotogravure presses and all affiliated equipment, including proof

presses, cylinder and parts cleaners, ink and solvent mixing and storage equipment, and solvent

recovery equipment

For packaging rotogravure/wide-web hexographic presses:

Code Description

PACK The facility has product and packaging rotogravure or wide-web flexographic printing presses

plus any other equipment which the owner or operator chooses to include in accordance with 40 CFR § 63.821(a)(3), excluding proof presses and excluding presses used primarily for coating, laminating, or other operations which the owner or operator chooses to exclude and meet the

criteria of 40 CFR §§ 63.821(a)(2)(ii)(A) and (a)(2)(ii)(B)

PACKPR A proof press used in a facility that has product and packaging rotogravure or wide-web

flexographic printing presses plus any other equipment which the owner or operator chooses to

include in accordance with 40 CFR § 63.821(a)(3)

PACKCT A press used primarily for coating, laminating, or other operations which the owner or operator

chooses to exclude and meet the criteria of 40 CFR §§ 63.821(a)(2)(ii)(A) and (a)(2)(ii)(B) at a facility which has product and packaging rotogravure or wide-web flexographic printing presses plus any other equipment which the owner or operator chooses to include in accordance with

40 CFR § 63.821(a)(3)

# **★** Complete "Applied Material Amount" only if "Press Type" is "PACK" or "PACKPR."

**Applied Material Amount:** Select one of the following options for the amount of applied material per month, for every month, of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, and other materials after the compliance date specified in 40 CFR § 63.826. Enter the code on the form.

Code Description

500- The amount of applied material per month is less than or equal to 500 kg (1,100 lbs.)

The amount of applied material per month is greater than 500 kg (1,100 lbs.)

#### ★ Complete "Organic HAP Amount" only if "Applied Material Amount" is "500+."

**Organic HAP Amount:** Select one of the following options for the amount of organic HAP after the compliance date specified in 40 CFR § 63.826. Enter the code on the form.

Code Description

The amount of organic HAP is less than or equal to 400 kg (880 lbs.) per month, for every month

The amount of organic HAP is greater than 400 kg (880 lbs.) per month, for every month

# Table 2b: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)

**Subpart KK: National Emission Standard for Hazardous Air Pollutants for the Printing and Publishing Industry** 

### **★** Complete Table 2b only if:

- "Press Type" is "PUBLIC" or
- "Press Type" is "PACK" and "Organic HAP Amount" is "400+" or
- "Press Type" is "PACKPR" and "Organic HAP Amount" is "400+."

**Process ID No.**: Enter the identification number (ID No.) for the printing processes (maximum 10 characters) as listed on Form OP-SUM, "Individual Unit Summary."

**SOP Index No.:** Site operating permit (SOP) applicants should indicate the SOP index number for the unit or group of units (maximum 15 characters consisting of numeric, alphanumeric characters, and/or dashes prefixed by a code for the applicable regulation [i.e., 60KB-XXXX]). For additional information relating to SOP index numbers, please refer to the TCEQ website at www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title V/sop initial.pdf.

**Control of Emissions**: Select one of the following options to describe the method of controlling emissions. Enter the code on the form.

Code Description

SOLREC Solvent recovery device CATOX Catalytic oxidizer

OTHOX Oxidizer other than a catalytic oxidizer

NONE Emissions are not controlled (this is an option only if "Press Type" is "PUBLIC")

**Control Device ID No.:** If applicable, enter the identification number (ID No.) for the solvent recovery system or oxidizer (maximum 10 characters). This number should be consistent with the control device identification number listed on Form OP-SUM. Use multiple lines if more than one control device is used. If there is no control device, then leave this column blank.

**Temperature Monitoring Equipment:** Enter "YES" if temperature monitoring equipment is being utilized. Otherwise, enter "NO."

**Control Device Operation Date:** Select one of the following dates of operation of the control device. Enter the code on the form.

Code Description

96- Control device was in operation prior to May 30, 1996 96+ Control device was in operation on or after May 30, 1996

**Complying With § 63.7(e)(2)(iv) or (h):** Enter "YES" if the owner or operator has met the requirements of either 40 CFR §§ 63.7(e)(2)(iv) or (h). Otherwise, enter "NO."

**Alternative Test Methods:** Enter "YES" if an alternative to procedures specified in 40 CFR § 63.827(e) are being used under 40 CFR § 63.827(f). Otherwise, enter "NO."

**★** Complete "Permanent Enclosure" only if "Alternate Test Method" is "NO."

Permanent Enclosure: Enter "YES" if a permanent total enclosure is being used. Otherwise, enter "NO."

★ Complete "Public Compliance Demonstration" only if "Press Type" is "PUBLIC" and "Control of Emissions" is "SOLREC," "CATOX," or "OTHOX."

**Public Compliance Demonstration:** Select one of the following procedures of showing that the HAP emissions limitation is achieved which demonstrates compliance. Enter the code on the form.

For "Control of Emissions" designation of "SOLREC:"

Code Description

LIOBAL Perform a liquid-liquid material balance for each month

CEM Use continuous emission monitors, conduct an initial performance test of capture efficiency, and

continuously monitor a site specific operating parameter to assure capture efficiency

For "Control of Emissions" designation of "CATOX" or "OTHOX:"

Code Description

TEST Demonstrate initial compliance through performance tests and continuing compliance through

continuous monitoring

OXCEM Use continuous emission monitors, conduct an initial performance test of capture efficiency, and

continuously monitor a site specific operating parameter to assure capture efficiency

### Table 2c: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)

**Subpart KK: National Emission Standard for Hazardous Air Pollutants for the Printing and Publishing Industry** 

**★** Complete Table 2c only if "Press Type" is "PACK" or "PACKPR."

**Process ID No.:** Enter the identification number (ID No.) for the printing processes (maximum 10 characters) as listed on Form OP-SUM, "Individual Unit Summary."

**SOP Index No.:** Site operating permit (SOP) applicants should indicate the SOP index number for the unit or group of units (maximum 15 characters consisting of numeric, alphanumeric characters, and/or dashes prefixed by a code for the applicable regulation [i.e., 60KB-XXXX]). For additional information relating to SOP index numbers, please refer to the TCEQ website at www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title\_V/sop\_initial.pdf.

**Compliance Demonstration**: Select one of the following procedures in 40 CFR §§ 63.825(b)(1) through (b)(10) by which compliance of the product and packaging rotogravure or wide-web flexographic printing affected source is demonstrated. Enter the code on the form.

Code Description

BONE Demonstrate that each ink, coating, varnish, adhesive, primer, solvent, diluent, reducer, thinner,

and other material applied during the month contains no more than 0.04 weight fraction organic

HAP on an as-purchased basis

BTWO Demonstrate that each ink, coating, varnish, adhesive, primer, and other solids-containing

material applied during the month contains no more than 0.04 weight fraction organic HAP on a

monthly average as-applied basis

BTHREEIA Demonstrate that each ink, coating, varnish, adhesive, primer, and other solids-containing

material contains no more than 0.04 weight-fraction organic HAP on a monthly average as-

applied basis

BTHREEIB Demonstrate that each ink, coating, varnish, adhesive, primer, and other solids-containing

material contains no more than 0.20 kg of organic HAP per kg of solids applied on a monthly

average as-applied basis

BFOUR Demonstrate that the monthly average as-applied organic HAP content, HL, of all materials

applied is less than 0.04 kg HAP per kg of material applied

BFIVE Demonstrate that the monthly average as-applied organic HAP content on the basis of solids

applied, Hs, is less than 0.20 kg HAP per kg solids applied

BSIX Demonstrate that the total monthly organic HAP applied, H is less than the calculated equivalent

allowable organic HAP, Ha

BSEVEN Operate a capture system and control device and demonstrate an overall organic HAP control

efficiency of at least 95% for each month

BEIGHT Operate a capture system and control device and limit the organic HAP emission rate to no more

than 0.20 kg organic HAP emitted per kg solids applied as determined on a monthly average

as-applied basis

BNINE Operate a capture system and control device and limit the organic HAP emission rate to no more

than 0.04 kg organic HAP emitted per kg material applied as determined on a monthly average

as-applied basis

BTEN Operate a capture system and control device and limit the monthly organic HAP emissions to less

than the allowable emissions as calculated in accordance with 40 CFR § 63.825(e)

**Number of Control Devices and Capture Systems:** Select one of the following numbers to describe the number of control devices and capture systems that are used to comply with 40 CFR §§ 63.825(b)(7) through (b)(10). Enter the code on the form.

Code Description

ONE Only one capture system and one control device is being used

MORE More than one capture system or more than one control device is being used

# **★** Complete "Control of Work Stations" only if "Number of Control Devices and Capture Systems" is "MORE."

**Control of Work Stations:** Select one of the following terms to describe the control of the work stations. Enter the code on the form.

Code Description

ALWAYS Only always-controlled work stations
NEVER Operating one or more never-controlled

INTER Operating one or more intermittently controlled work stations

### ★ Complete "Choosing to Comply With § 63.825(f) or (h)" only if "Compliance Demonstration" is "BSEVEN."

**Choosing to Comply With §§ 63.825(f) OR (h):** Select one of the following options to describe if the owner or operator is choosing to comply with 40 CFR §§ 63.825(f) or (h). Enter the code on the form.

Code Description

F Choosing to comply with 40 CFR § 63.825(f)

H Choosing to comply with 40 CFR § 63.825(h) (this is an option only if "Control of Work

Stations" is "ALWAYS")

NEITHER Neither of the above options are chosen

**Pack Compliance Demonstration:** Select one of the following procedures for demonstrating compliance as described in 40 CFR §§ 63.825(c), (d), (f), and (h). Enter the code on the form.

#### For:

- 1. "Compliance Demonstration" designation of "BSEVEN" with; "Number of Control Devices and Capture Systems" designation of "ONE"; or "Choosing to Comply with 40 CFR §§ 63.825(f) or (h)" designation of "NEITHER:"
- 2. "Compliance Demonstration" designation of "BEIGHT," "BNINE," or "BTEN" with; "Control of Work Stations" designation of "ALWAYS" and "Number of Control Devices and Capture Systems" designation of "ONE:"

Code Description

C1 Perform a liquid-liquid material balance for each and every month (for "Control of Emissions"

designation of "SOLREC" only)

C2 Use continuous emission monitors, conduct an initial performance test of capture efficiency, and

continuously monitor a site specific operating parameter to assure capture efficiency (for "Control

of Emissions" designation of "SOLREC" only)

D1 Demonstrate initial compliance through performance tests of capture efficiency and control

device efficiency and continuing compliance through continuous monitoring of capture system and control device operating parameters as described in 40 CFR § 63.825(d)(1) (for "Control of

Emissions" designation of "CATOX" or "OTHOX" only)

D2 Use continuous emission monitors, conduct an initial performance test of capture efficiency, and

continuously monitor a site specific operating parameter to assure capture efficiency (for "Control

of Emissions" designation of "CATOX" or "OTHOX" only)

3. "Compliance Demonstration" designation of "BSEVEN" with "Control of Work Stations" designation of "ALWAYS" and "Choosing to Comply with 40 CFR §§ 63.825(f) or (h)" designation of "H:"

Code Description

H1 The volatile matter collection and recovery efficiency greater than or equal to 95% (for "Control

of Emissions" designation of "SOLREC" only)

H2 The overall organic HAP control efficiency for each press or group of presses served by that

control device and a common capture system greater than or equal to 95% and the average capture system operating parameter value for each capture system serving that control device greater than or less than (as appropriate) the operating parameter value established for that

capture system for each three hour period

H3 The overall organic HAP control efficiency for each press or group of presses served by that

control device and a common capture system greater than or equal to 95%, the oxidizer is operated such that the average operating parameter value greater than the operating parameter value established for each three hour period, and the average capture system operating parameter value for each capture system serving that control device greater than or less than (as appropriate) the operating parameter value established for that capture system for each three hour period (for

"Control of Emissions" designation of "CATOX" or "OTHOX" only)

# For:

- 1. "Compliance Demonstration" designation of "BSEVEN" with "Choosing to Comply with 40 CFR §§ 63.825(f) or (h)" designation of "F:"
- 2. For any "Compliance Demonstration" designation, with the exception of "BSEVEN" designation with "Control of Work Stations" designation of "NEVER" or "INTER"; or "Number of Control Devices and Capture Systems" designation of "MORE:"

Code	Description
F1	Comply by means of a liquid-liquid mass balance (for "Control of Emissions" designation of "SOLREC" only)
F2	Comply by means of an initial test of capture efficiency, continuous emission monitoring of the control device, and continuous monitoring of a capture system operating parameter (for "Control of Emissions" designation of "SOLREC" only)
F3	Demonstrate compliance through performance tests of capture efficiency and control device efficiency and continuous compliance through continuous monitoring of capture system and control device operating parameters (for "Control of Emissions" designation of "CATOX" or "OTHOX" only)
F4	Demonstrate compliance through an initial capture efficiency test, continuous emission monitoring of the control device and continuous monitoring of a capture system operating parameter (for "Control of Emissions" designation of "CATOX" or "OTHOX" only)

### Table 3: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)

Subpart E: Graphic Arts (Printing) by Rotogravure and Flexographic Processes

★ Complete Table 3 if the facility is located in the Beaumont/Port Arthur, Dallas/Fort Worth, El Paso, Houston/Galveston areas; or in Gregg, Nueces, or Victoria County.

**Process ID No.:** Enter the identification number (ID No.) for the printing process (maximum 10 characters) as listed on Form OP-SUM, "Individual Unit Summary."

**SOP Index No.:** Site operating permit (SOP) applicants should indicate the SOP index number for the unit or group of units (maximum 15 characters consisting of numeric, alphanumeric characters, and/or dashes prefixed by a code for the applicable regulation [i.e., 60KB-XXXX]). For additional information relating to SOP index numbers, please refer to the TCEQ website at www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title\_V/sop\_initial.pdf.

**Alternate Control Requirement (ACR):** Enter "YES" if the TCEQ Executive Director, in accordance with 30 TAC § 115.910, has approved an alternate method of demonstrating and documenting continuous compliance with the alternate control requirement (ACR) or exemption criteria. Otherwise, enter "NO."

**ACR ID No.:** If an ACR has been approved, enter the corresponding ACR unique identifier for each process (maximum 10 characters). If the unique identifier is unavailable, then enter the date of the ACR approval letter in the table column. The unique identifier and/or the date of the approval letter are contained in the compliance file under the appropriate regulated entity number. Otherwise, leave this column blank.

**Process Type:** Select one of the following process types. Enter the code on the form.

Code Description

PUBLIC The operation is a publication rotogravure process

PACK The operation is a packaging rotogravure process

FLEXO The operation is a flexographic process

FLEXI13- The operation is a flexible package process located in D-FW or HGB are before 03/01/2013

FLEXI13+ The operation is a flexible package process located in D-FW or HGB are after 03/01/2013

NONE The operation is neither a rotogravure nor a flexographic printing process

# ▼ Continue if "Process Type" is "PUBLIC," "PACK," "FLEXO," "FLEXI13- or "FLEXI13+."

**Potential Uncontrolled VOC Emissions:** Select one of the following options to describe the potential uncontrolled VOC emissions from a property containing rotogravure and flexographic facilities. Enter the code on the form.

For facilities in the Beaumont/Port Arthur, Dallas/Fort Worth or El Paso area:

Code Description

50- Potential uncontrolled VOC emissions is less than 50 tpy

50+ Potential uncontrolled VOC emissions are greater than or equal to 50 tpy

For facilities in the Houston/Galveston area:

Code Description
25- Potential uncontrolled VOC emissions is less than 25 tpy
25+ Potential uncontrolled VOC emissions are greater than or equal to 25 tpy

For Flexible processes in the Dallas/Fort Worth, or Houston/Galveston/Brazoria area:

3.0-	Potential uncontrolled VOC emission is less than 3.0 tpy
3.0+	Potential uncontrolled VOC emissions are greater than or equal to 3.0 tpy
25-	Potential uncontrolled VOC emission is less than 25 tpy
25+	Potential uncontrolled VOC emissions are greater than or equal to 25 tpy

For facilities in Gregg, Nueces, or Victoria County:

Code	Description
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100- Potential uncontrolled VOC emissions is less than 100 tpy

Potential uncontrolled VOC emissions are greater than or equal to 100 tpy

# ▼ Continue only if "Potential Uncontrolled VOC Emissions" is "50+," "25+," "3.0+," or "100+."

**Control Method:** Select one of the following methods used to control or limit emissions. Enter the code on the form.

Code	Description
VAPCON90	A vapor control system is used for VOC control with an effective capture system by at least 90%
	by weight
0.80lb	The process uses limits of the VOC emissions from the coatings to 0.80 pound of VOC per pound
	of solids applied
0.16lb	The process uses limits of the VOC emissions from the coatings to 0.16 pound of VOC per pound
	of coating applied
VAPC0.80	Using a combination of coatings and a vapor control system to limit VOC emissions from
	coatings to 0.80 pound per pound of VOC applied
VAPC0.16	Using a combination of coatings and a vapor control system to limit VOC emissions from
	coatings to 0.16 pound per pound of VOC applied
VAPCON80	A vapor control system that achieves an overall control efficiency of at least 80% by weight
LOSOLV	The process uses low solvent ink with a volatile fraction, containing 25% by volume or less of
	VOC solvent and 75% by volume or more of water and exempt solvent to limit VOC emissions
HISLID	The process uses high solids solvent-borne ink containing 60% by volume or more of nonvolatile
	material (minus water and exempt solvent) to limit VOC emissions

**Control Device:** Select one of the following options for the control device used to comply with the VOC limit. Enter the code on the form.

Code Description
CAPCAR A capture and carbon adsorption system is used for VOC control

CAPINC A capture and carbon adsorption system is used for VOC control

A capture system and an incinerator is used for VOC control

**Control Device ID No.:** If applicable, enter the identification number (ID No.) for the control device to which emissions are routed (maximum 10 characters). This number should be consistent with the control device identification number listed on Form OP-SUM. If there is no control device, then leave this column blank.

# ▼ Continue only if the "Control Method" is "VAPCON90" or is "VAPC80."

**Permanent Total Enclosure:** Enter "YES" if a permanent total enclosure, which meets the specifications of 40 CFR Part 52.741, Subpart O, Appendix B, Procedure T, and which directs all VOC to a control device, is used. Otherwise, enter "NO."

### Table 4: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)

**Subchapter E: Offset Lithographic Printing** 

★ Complete Table 4 for offset lithographic printing processes/lines located in the Dallas/Fort Worth, El Paso, and Houston/Galveston/Brazoria areas, as defined in 30 TAC § 115.10.

**Process ID No.:** Enter the identification number (ID No.) for the printing process (maximum 10 characters) as listed on Form OP-SUM, "Individual Unit Summary."

**SOP Index No.:** Site operating permit (SOP) applicants should indicate the SOP index number for the unit or group of units (maximum 15 characters consisting of numeric, alphanumeric characters, and/or dashes prefixed by a code for the applicable regulation [i.e., 60KB-XXXX]). For additional information relating to SOP index numbers, please refer to the TCEO website at www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title V/sop initial.pdf.

# **★** Complete "Combined VOC Emissions Exemption" only for sources located in Houston/Galveston/Brazoria or Dallas/Fort Worth areas.

**Combined VOC Emissions Exemption:** Enter "YES" if the facility has combined VOC emissions of less than 3 tons per year. Otherwise, enter "NO."

# **▼** Continue if "Combined VOC Emissions Exemption" is "NO," or if the source is located in the El Paso area.

**Alternate Control Requirement (ACR):** Enter "YES" if the TCEQ Executive Director, in accordance with 30 TAC § 115.910, has approved an alternate method of demonstrating and documenting continuous compliance with the applicable control requirements (ACR) or exemption criteria. Otherwise, enter "NO."

**ACR ID No.:** If an ACR has been approved, enter the corresponding ACR unique identifier for each process (maximum 10 characters). If the unique identifier is unavailable, then enter the date of the ACR approval letter in the table column. The unique identifier and/or the date of the approval letter are contained in the compliance file under the appropriate regulated entity number. Otherwise, leave this column blank.

## **▼** Continue only if "Alternate Control Requirement" is "NO."

**Alcohol Use**: Enter "YES" if the offset lithographic printing press uses alcohol in the fountain solution. Otherwise, enter "NO."

**Press Type:** Select one of the following types of presses used. Enter the code on the form.

Code Description

HEAT A heatset web offset lithographic printing press

NEWS A nonheatset web offset lithographic printing press which prints newspaper

NONNEWS A nonheatset web offset lithographic printing press which does not print newspaper

SHEET A sheetfed offset lithographic printing press

**Refrigeration Equipment:** Enter "YES" if refrigeration equipment is used on the fountain solution. Otherwise, enter "NO."

**Control Device:** Select one of the following options for the control device used to comply with 30 TAC § 115.442(2). Enter the code on the form.

Code Description

INC A direct-flame incinerator or catalyst bed is used

CARB A carbon adsorption system

OTHER A solvent recovery system other than a carbon adsorption system is used.

NOSRS No solvent recovery system.

**Control Device ID No.:** If applicable, enter the identification number (ID No.) for the control device to which emissions are routed (maximum 10 characters). This number should be consistent with the control device identification number listed on Form OP-SUM. If there is no control device, then leave this column blank.

**Automatic Cleaning Equipment:** Enter "YES" if automatic cleaning equipment is used with the press. Otherwise, enter "NO."

# **★** Complete "Towel Handling Program" only for sources located in Houston/ Galveston/ Brazoria areas or Dallas/Fort Worth areas.

**Towel Handling Program:** Enter "YES" if the facility has a towel handling program in place, as described in 30 TAC § 115.442(b)(1) or (c)(1). Otherwise enter "NO."

Table 5a: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)

**Subpart QQ: Standards of Performance for the Graphic Arts Industry: Publication Rotogravure Printing** 

**Process ID No.:** Enter the identification number (ID No.) for the printing process (maximum 10 characters) as listed on Form OP-SUM, "Individual Unit Summary."

**SOP Index No.:** Site operating permit (SOP) applicants should indicate the SOP index number for the unit or group of units (maximum 15 characters consisting of numeric, alphanumeric characters, and/or dashes prefixed by a code for the applicable regulation [i.e., 60KB-XXXX]). For additional information relating to SOP index numbers, please refer to the TCEQ website at www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title\_V/sop\_initial.pdf.

**Construction/Modification Date:** Select one of the following options that best describes the date of commencement of the most recent construction, reconstruction, or modification. Enter the code on the form.

Code Description

80- On or before October 28, 1980

80+ After October 28, 1980

**Press Type:** Select one of the following press types. Enter the code on the form.

Code Description

PUBLIC Publication rotogravure printing press which is not a proof press

PROOF Proof press

OTHER Press is not a publication rotogravure printing press

# ▼ Continue only if "Press Type" is "PUBLIC" and "Construction/Modification Date" is "80+."

**Auto Temp Compensator:** Enter "YES" if an automatic temperature compensator is used with any liquid metering device. Otherwise, enter "NO."

**Shared Ink Storage:** Enter "YES" if two or more facilities share the same raw ink storage or handling system. Otherwise, enter "NO."

**Affected Facility Ink Systems:** Select one of the following ink systems for the affected facilities. Enter the code on the form.

Code Description

WATER Affected facilities use only waterborne ink systems SOLV Affected facilities use only solvent-borne ink systems

BOTH Affected facilities use some waterborne ink systems and some solvent-borne ink systems

**Existing Facility Ink Systems:** Select one of the following ink systems for the existing facilities. Enter the code on the form.

Code Description

WATER Existing facilities use only waterborne ink systems SOLV Existing facilities use only solvent-borne ink systems

BOTH Existing facilities use some waterborne ink systems and some solvent-borne ink systems

**Plant-Wide Compliance:** Enter "YES" if all facilities, existing and affected, within the same plant boundary are choosing to show compliance on a plant-wide basis. Otherwise, enter "NO."

#### Table 5b: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)

**Subpart QQ: Standards of Performance for the Graphic Arts Industry: Publication Rotogravure Printing** 

# **★** Complete only if "Plant-wide Compliance" is "NO."

**Process ID No.:** Enter the identification number (ID No.) for the printing process (maximum 10 characters) as listed on Form OP-SUM, "Individual Unit Summary."

**SOP Index No.:** Site operating permit (SOP) applicants should indicate the SOP index number for the unit or group of units (maximum 15 characters consisting of numeric, alphanumeric characters, and/or dashes prefixed by a code for the applicable regulation [i.e., 60KB-XXXX]). For additional information relating to SOP index numbers, please refer to the TCEO website at www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title V/sop initial.pdf.

**Shared Solvent Recovery System:** Select one of the following options to describe solvent recovery systems. Enter the code on the form.

Code Description

AFFECT All (two or more) affected facilities use the same solvent recovery systems

BOTH Two or more affected and existing facilities use the same solvent recovery systems

NO Solvent recovery systems are not shared

**Control Device ID No.:** If applicable, enter the identification number (ID No.) for the solvent recovery system (maximum 10 characters). This number should be consistent with the control device identification number listed on Form OP-SUM. If there is no control device (solvent recovery system), then leave this column blank.

# **★** Complete "Non-resettable Totalizing Meter" only if "Shared Solvent Recovery System" is "NONE."

**Non-Resettable Totalizing Meter:** Enter "YES" if bulk storage of each color of raw ink is measured by a non-resettable totalizing meter device(s). Otherwise, enter "NO."

All Facilities Affected: Enter "YES" if all facilities are affected. Otherwise, enter "NO."

# **★** Complete "Separate Emission Test" only if "All Facilities Affected" is "NO."

**Separate Emission Test:** Enter "YES" if compliance is determined by conducting a separate emission test on existing and affected processes. Otherwise, enter "NO."

# Texas Commission on Environmental Quality Printing Attributes Form OP-UA22 (Page 1) Federal Operating Permit Program

Table 1: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart FFF: Standards of Performance for Flexible Vinyl and Urethane Coating and Printing

Date:	Permit No.:		Regulated Entity No.:					
Area Name:					Customer I	Reference N	lo.:	
Process ID No.	SOP Index No.	Rotogravure Printing Line	Construction/ Modification Date	of Iı	ed Average nk VOC ontent	Control Types	Control Device ID No.	Inventory System Used

TCEQ - 10047 (APDG 5283v21, Revised 02/17) OP-UA22
This form is for use by facilities subject to air quality permit requirements
and may be revised periodically. (Title V Release 02/17)

# Texas Commission on Environmental Quality Printing Attributes Form OP-UA22 (Page 2) Federal Operating Permit Program

Table 2a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63) Subpart KK: National Emission Standards for the Printing and Publishing Industry

Date: Permit No.:							Regulated Entity No.:					
Area Name:					Customer Reference No.:							
				~								

Process ID No.	SOP Index No.	Equipment Type	Other Equipment	Construction/ Modification Date	Individual HAP Usage	Collective HAP Usage	Press Type	Applied Material Amount	Organic HAP Amount

# Texas Commission on Environmental Quality Printing Attributes Form OP-UA22 (Page 3) Federal Operating Permit Program

Table 2b: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63) Subpart KK: National Emission Standards for the Printing and Publishing Industry

Date: Permit No.:							Regulated Entity No.:				
Area Name:						Customer Reference No.:					

Process ID No.	SOP Index No.	Control of Emissions	Control Device ID No.	Temperature Monitoring Equipment	Control Device Operation Date	Complying With § 63.7(e)(2)(iv ) or (h)	Alternate Test Methods	Permanent Enclosure	Public Compliance Demonstration

# Texas Commission on Environmental Quality Printing Attributes Form OP-UA22 (Page 4) Federal Operating Permit Program

Table 2c: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63) Subpart KK: National Emission Standards for the Printing and Publishing Industry

Date: Permit No.:						Regulated Entity No.:				
Area Name:						Customer Re	eference No.:			
				NT 1	6.0					

Process ID No.	SOP Index No.	Compliance Demonstration	Number of Control Devices and Capture Systems	Control of Work Stations	Choosing to Comply With §§ 63.825(f) or (h)	PACK Compliance Demonstration

# Texas Commission on Environmental Quality Printing Attributes Form OP-UA22 (Page 5) Federal Operating Permit Program

Table 3: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115) Subchapter E: Graphic Arts (Printing) by Rotogravure and Flexographic Processes

Date:	Permit No.:	Regulated Entity No.:
Area Name:		Customer Reference No.:

Process ID No.	SOP Index No.	Alternate Control Requirement (ACR)	ACR ID No.	Process Type	Potential Uncontrolled VOC Emissions	Control Method	Control Device	Control Device ID No.	Permanent Total Enclosure

# Texas Commission on Environmental Quality Printing Attributes Form OP-UA22 (Page 6) Federal Operating Permit Program

# Table 4: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115) Subchapter E: Offset Lithographic Printing

Date:	Permit No.:	Regulated Entity No.:
Area Name:		Customer Reference No.:

Process ID No.	SOP Index No.	Combined VOC Emissions	Alternate Control Requirement (ACR)	ACR ID No.	Alcohol Use	Press Type	Refrigeration Equipment	Control Device	Control Device ID No.	Automatic Cleaning Equipment	Towel Handling Program

# Texas Commission on Environmental Quality Printing Attributes Form OP-UA22 (Page 7) Federal Operating Permit Program

Table 5a: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60) Subpart QQ: Standards of Performance for the Graphic Arts Industry: Publication Rotogravure Printing

Date: Permit No.:					Regulated 1	Regulated Entity No.:				
Area Name:					Customer 1	Reference No.:				
Process ID No.	SOP Index No.	Construction/ Modification Date	Press Type	Auto Temp Compensator	Shared Ink Storage	Affected Facility Ink Systems	Existing Facility Ink Systems	Plant-wide Compliance		
Process ID No.	SOP Index No.	Modification	Press Type	_		Facility Ink	Facility Ink			

	Bute		Bystems	Systems	

# Texas Commission on Environmental Quality Printing Attributes Form OP-UA22 (Page 8) Federal Operating Permit Program

Table 5b: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart QQ: Standards of Performance for the Graphic Arts Industry: Publication Rotogravure Printing

Regulated Entity No.:

Area Name:		Cus	Customer Reference No.:			
Process ID No.	SOP Index No.	Shared Solvent Recovery System	Control Device ID No	Non-Resettable Totalizing Meter	All Facilities Affected	Separate Emission Test

Permit No.:

Date: