Louisville Metro Air Pollution Control District
701 West Ormsby Avenue, Suite 303
Louisville, Kentucky 40203-3137

9/24/2019

Federally-Enforceable District-Origin Operating Permit Statement of Basis

Source: Multi Packaging Solutions
dba Westrock
1703 South Brook St.
Louisville, KY 40208

Owner: MPS of Kentucky, LLC
5800 West Grand River Ave
Lansing, MI 48906

Application Documents:	See Table I-8		
Draft Permit:	08/21/2019		
Permitting Engineer:	Rick Williams	Permit Number:	O-1128-19-V
Plant ID: 1128	SIC: 2752		NAICS: 323111

Introduction:

This permit will be issued pursuant to District Regulation 2.17- Federally Enforceable District Origin Operating Permits. Its purpose is to limit the plant wide potential emission rates from this source to below major source threshold levels and to provide methods of determining continued compliance with all applicable requirements.

The present action is a renewal of the operating permit currently in effect [28252-14-F (R2)]. Additionally, a name change from Multi Packing Solutions to Multi Packaging Solutions dba Westrock.

Jefferson County is classified as an attainment area for lead (Pb), nitrogen dioxide (NO_2), carbon monoxide (CO), particulate matter less than 10 microns (PM_{10}), and particulate matter less than 2.5 microns ($PM_{2.5}$). Jefferson County is classified as a nonattainment area for ozone (O_3). This facility is located in the portion of Jefferson County that is an attainment area for sulfur dioxide (SO_2).

Permit Application Type:

☐ Initial issuance

Permit Revision
- ☐ Administrative
- ☐ Minor
- ☐ Significant

☒ Permit renewal

Compliance Summary:

☒ Compliance certification signed

☐ Source is out of compliance

☐ Compliance schedule included

☒ Source is operating in compliance

I Source Information

1. Product Description:

Multi-Packaging Solutions produces printed packaging materials by offset lithography.

2. Process Description:

Multi-Packaging Solutions prints materials on paper using one of several offset printers, trims the material to size, and, if necessary, performs collation and binding of the printed material.

3. Site Determination:

There are no other facilities that are contiguous or adjacent to this facility.

4. Emission Unit Summary:

Emission Unit	Equipment Description
U1	Five offset litho printing presses
U2	Bindery equipment (paper cutters, folders, stichers, perforators, and a waste paper baler
U3	Serializers (inkjet printers that print sequential numbers onto printed material)
IA	Cold solvent parts washer, 12 HP emergency generators

5. Fugitive Sources:

Emissions from of the permitted equipment are fugitive except for the paper baler which is controlled by a dedicated filter unit.

6. Permit Revisions:

Permit No.	Public Notice Date	Issue Date	Change Type	Description/Scope
28252-14-F	07/09/2014	07/13/2014	Initial	Initial FEDOOP permit, incorporating outstanding operating and construction permits to ensure accurate list of operating presses.
28252-14-F (R1)	N/A	07/19/2016	Admin	Update IA list, correct inaccurate internal cross references and external hyperlinks.
28252-14-F (R2)	06/14/2017	07/18/2017		**Significant Revision** General Condition 10: Delete reference to greenhouse gasses. (Underlying regulation has been stayed.) Emission unit U1: Remove emission point E5 and add emission point E5a pursuant to construction permit C-1128-1001-17-F.
				Administrative Revision U1: In all sections, update TAC language to current standards. No limits or requirements are changed. U1-S1.VOC: Revise text for annual per-emission-point emission limit, for clarity. No limits are changed. Update caption in **Error! Reference source not found.** to r eflect correct construction permit number. U1-S2.VOC: Revise text for annual per-emission-point monitoring and recordkeeping requirements, for clarity. No requirements are changed. U2 Equipment table: Update bindery equipment to reflect new equipment moved from Shorewood Packaging, Inc (ID#0885) and equipment removed from facility. U3: Add emission unit to capture insignificant activities with applicable regulations. Unit IA-EG: Deleted. Previous permit included generic emergency generator language, although there were no emergency generators actually present. Insignificant Activity table: Add newly identified insignificant activities. Trivial Activities table: Added Source-wide Activities table: Added. Includes emergency generators with negligible emissions and no applicable requirements. Attachment A-Calculation Methodology: Pages added for clarity

Permit No.	Public Notice Date	Issue Date	Change Type	Description/Scope
O-1128-19-F	08/21/2019	09/24/2019	Renew	Entire permit. Revise description of E5a from construction permit to reflect actual equipment installed. Update conditions to current standards, as necessary. Name change (oB# 91286)

7. Construction Permit History:

Permit No.	Effective Date	Description
356-94-O	06/30/1997	Issued to Hamilton Printing Company. Eight Printing presses. (None still operating at this location.)
251-01-C	02/12/2001	Issued to Hamilton Printing Co. Install 3 printing presses (None still operating at this location.)
252-01-O	02/28/2002	Issued to Hamilton Printing Company. Six lithographic presses. (None still operating at this location)
110-04-C	09/30/2004	Issued to Hamilton Printing Co. Install 1 Komori 4-color press, replacing earlier 6-color press. (No longer operating at this location.)
244-05-C	07/15/2005	Issued to Hamilton Printing Co. Install one Heidelberg SM102-8P, 8-color press.
371-05-C	12/23/2005	Issued to Hamilton Printing Co. Install one Heidelberg SM102-8P, 8 color press.
180-06-C	07/31/2006	Install one Heidelberg 102CD-LX 6-color press. This permit lists one Komori 141 press, since removed and the two Heidelberg presses installed in 2005.
693-07-C	01/07/2008	Construction permit for existing bindery equipment not previously permitted. Equipment includes: 3 stitchers, 5 folders, 2 paper cutters, and 1 scrap baler with bag filter system.
478-08-C	07/31/2008	Install Heidelberg SM102-2-P 2-color printer.
27-10-C	02/22/2010	Comprehensive construction permit, listing: Heidelberg SM102-2-P [see 478-08-C] Heidelberg CD102-6+LX [NEW] Heidelberg 102CD-LX (640H) [see 108-06-C] Heidelberg SM102-8P (840A) [see 244-05-C] Heidelberg SM102-8P (840B) [see 371-05-C]

Permit No.	Effective Date	Description
32026-11-C	06/01/2011	Install one Heidelberg Speedmaster XL105 (841). Also lists presses in 27-10-C, deleting only press designated (840A).
C-1128-1001-17-F	05/30/2017	Remove Heidelberg SM-102-8P press (E5), install Heidelberg XL 105-8P press (E5a) while retaining designation 840B, list other existing presses for traceability of BACT limits. (See footnote 1 in the construction permit.) [The operating permit renewal application notes that the equipment actually delivered and installed is a Heidelberg XL106, with the same operating characteristics as the XL105]

8. Application and Related Documents

Document Number	Date	Description
98465	05/21/2019	Calculation of fountain solution day tank emissions
98517	05/29/2019	New ink inquiry
98518	05/29/2019	MSDS for new ink
98539	05/29/2019	APCD response regarding HAP content of new inks
98540	05/29/2019	Additional information of new ink from MPS
98547	05/29/2019	Renewal application
98684	06/06/2019	New ink data and inquiry
98690	06/11/2019	New ink approved for testing
oB 3228	08/05/2019	Transmittal of draft permit prior to Public Comment period
oB 91240	08/20/2019	Company comments on pre-public comment draft
oB 91253	08/20/2019	APCD response to company comments
oB 91257	08/20/2019	Additional APCD response to company comments
oB 91286	08/20/2019	Company submission of AP-100A for name change

9. Emission Summary

Pollutant (ton/yr)	CO	NOx	SO_2	PM_{10}	VOC	Total HAP	Single HAP
Actual Emissions 2017	0.95[1]	1.18[1]	0.02[1]	2.45	33.3	1.23	0.82
Major source trigger (based on PTE)	No	No	No	No	Yes	No	Yes

10. Applicable Requirements

☒	40 CFR 60	☒	SIP	☒	40 CFR 63
☐	40 CFR 61	☒	District Origin	☐	Other

11. Referenced Federal Regulations:

40 CFR 63, Subpart ZZZZ: *National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*

40 CFR 60, Subpart JJJJ: *Standards of Performance for Stationary Spark Ignition Internal Combustion Engines*

12. Non-Applicable Regulations:

None

II Regulatory Analysis

1. Stratospheric Ozone Protection Requirements:

Title VI of the CAAA regulates ozone depleting substances and requires a phase-out of their use. This rule applies to any facility that manufactures, sells, distributes, or otherwise uses any of the listed chemicals. Multi Packaging Systems does not manufacture, sell, or distribute any of the listed chemicals. The source's use of listed chemicals is that in fire extinguishers, chillers, air conditioners and other HVAC equipment.

2. Basis of Regulation Applicability

a. Applicable Regulations

Regulation	Title	Basis
2.17	Federally Enforceable District Origin Operating Permits	Specifies requirements for potentially-major sources to obtain a permit as a synthetic minor source

[1] Emissions based on PTE. Not reported in emission inventory.

Regulation	Title	Basis
5.00	Definitions	**STAR** These definitions apply to terms ae used in regulations in Part 5 and Regulation 1.06 Section5.
5.01	General Provisions	**STAR** Sets forth the General Duty for a source to minimize the harmful effects to the general public of any toxic air emissions
5.20	Methodology for Determining the Benchmark Ambient Concentration of a Toxic Air Contaminant	**STAR** Any TAC which does not have a currently-established BAC must have such value determined by the methodology set forth here.
5.21	Environmental Acceptability for Toxic Air Contaminants	**STAR** Applies to any process or process equipment at a stationary source that emits, or may emit, a toxic air contaminant
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant	**STAR** Establishes the procedures for determining the maximum concentration of a toxic air contaminant in the ambient air
5.23	Categories of Toxic Air Contaminants	**STAR** Identifies the categories of toxic air contaminants to be addressed as part of the STAR regulations
6.18	Standards of Performance for Solvent Metal Cleaning Equipment	Sets emission and work practice standards for metal-cleaning equipment using cold solvents.
7.08	Standards of Performance for New Process Operations	Applies to each process operation, except any process otherwise regulated by any other portion of Regulation 7, with respect to those pollutants otherwise regulated
7.25	Standard of Performance for New Sources Using Volatile Organic Compounds	Applies to each affected facility not elsewhere regulated in Regulation 7 as to emissions of VOCs
40 CFR 63, Subpart ZZZZ	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines	Applies to sources that own or operate a stationary RICE at a major or area source of HAP emissions

Regulation	Title	Basis
40 CFR 60 Subpart JJJJ	Standards of Performance for Stationary Spark Ignition Internal Combustion Engines	Applicable to manufacturers, owners, and operators of stationary spark ignition (SI) internal combustion engines (ICE) that commence construction after June 12, 2006

b. Plantwide

Multi Packaging Solutions is potentially major for VOC and a single HAP (xylene). Regulation 2.17 – F*ederally Enforceable District Origin Operating Permits* establishes requirements to limit the plant wide potential emission rates to below major source threshold levels and to provide methods of determining continued compliance with all applicable requirements. The source requested limits of VOC less than 100 tons per year to be classified as a synthetic minor (FEDOOP) source.

Regulations 5.00 5.20, 5.21, and 5.23 (STAR Program) establishes requirements for environmental acceptability of toxic air contaminants (TACs) and the requirement to comply with all applicable emission standards.

A TAC Environmental Acceptability Demonstration was completed in July 2019. Compliance with the STAR EA Goals was demonstrated in the EA Demonstration.

The plantwide modeled risk is presented in Table 1:

Plantwide Total	All New and Modified [2]	
	Actual	Goal
Industrial Total EAG_C	0.244	38
Industrial Total EAG_{NC}	0.015	N/A
Non-Industrial Total EAG_C	0.244	3.8
Non-Industrial Total EAG_{NC}	0.015	N/A

Table 1. Plantwide summary

The modeled risk for each emission point and compound that is part of this construction and that is not de minimis is shown in Table 2.

[2] "New or modified process or process equipment" means a process or process equipment for which the District received an administratively complete construction permit application on or after July 1, 2005… [Regulation 5.00, section 1.20]. All covered equipment was installed in or after July 2005.

TAC	E1		E2		E3		E4		E5a	
	R_c	R_{NC}	R_c	R_{NC}	R_c	R_{NC}	R_c	R_{NC}	R_c	R_{NC}
Benzene	0.021	0.000	0.015	0.000	0.015	0.000	0.020	0.000	0.020	0.000
Ethylbenzene	0.035	0.000	0.025	0.000	0.025	0.000	0.034	0.000	0.034	0.000
Trimethylbenzene	- - -	0.003	- - -	0.002	- - -	0.002	- - -	0.003	- - -	0.003

Table 2. Individual modeled risk for non-de minimis emission points and compounds. Industrial and non-industrial risks are equal. [3]

Regulation 2.17, section 5.2, requires monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit. The owner or operator shall maintain all the required records for a minimum of 5 years and make the records readily available to the district upon request.

Regulation 2.17, section 7.2, requires stationary sources for which a FEDOOP is issued to submit an Annual Compliance Certification by April 15, of the following calendar year. In addition, as required by Regulation 2.17, section 5.2, the source shall submit regular reports to show compliance with the permit. Compliance reports and compliance certifications shall be signed by a responsible official and shall include a certification statement per Regulation 2.1. The compliance reports are due within 60 days of the end of the reporting period:

Reporting Period	Report Due Date
January 1 - June 30	August 29
July 1 - December 31	March 1 of the following year

c. Emission Unit U1 – Printing Presses

EP	Description	Applicable Regulations
E1	Heidelberg Speedmaster XL 105: 8-color lithographic printing press, 15,000 sheets/hr, 29” x 41”	STAR[4] 7.25
E2	Heidelberg CD102-6+LX: 6-color lithographic printing press, 15,000 sheets/hr, 28” x 40”	
E3	Heidelberg 102CD LX: 6-color lithographic printing press, 15,000 sheets/hr, 28” x 40”	
E4	Heidelberg SM 102-8P (840A): 8-color lithographic printing press, 13,000 sheets/hr, 28” x 40”	

[3] The maximum modeled concentration occurs close to the border between industrial and non-industrial property, just on the non-industrial side of the border. Thus, using the same concentration for both property types will slightly over-estimate the calculated risk for industrial property.

[4] STAR comprises regulations 5.00, 5.01, 5.20, 5.21, 5.22, and 5.23

EP	Description	Applicable Regulations
E5a	Heidelberg XL106: 8-color lithographic printing press, 15,000 sheets/hr, 28” x 40”	

i. Standards

(1) TAC

(a) See Plantwide conditions.

(2) VOC

(a) Regulation 7.25 establishes a VOC emission limit for VOC-containing materials used at the facility.

(b) Previously-issued construction permits have established specific VOC content-limits for the various fluids used in the lithographic printing process and established these limits as BACT for these processes.

d. Emission Unit U2 – Bindery Operations

EP	Description	Applicable Regulations
E6	Polar Cutter, model 137XT-AT, 25,000 sheets/hour; 54” x 57.09”	
E7a	Polar cutter, model 137AT-X, 25,000 sheets/hour; 54” x 57.09”	
E7b	Polar cutter, model 137AT-X, 25,000 sheets/hour; 54” x 57.09”	
E7c	Polar cutter, model 137ED, 25,000 sheets/hour; 54” x 57.09”	
E7d	Polar cutter, model 115EMC, 25,000 sheets/hour; 54” x 57.09”	
E7e	Polar cutter, model 17AT-X, 25,000 sheets/hour; 54” x 57.09”	
E8a	Stahl folder, model 142F-C-3, 12,000 sheets/hour, 26" × 40"	
E9a	Stahl folder, model 229015, 12,000 sheets/hour, 26" × 40"	
E10	MBO folder, model B30-E-C, designated #2	
E11	MBO folder, model B26-S-C, designated #1	
E12	MBO folder, model B20, designated “Pile”	
E13	MBO folder, model B120	
E14	Stahl folder, model RFH 832	

EP	Description	Applicable Regulations
E15	Muller Stitcher/Trimmer, model 1529.0417 (Bravo-T), 11,000 sheets per hour; 12” x 19”	
E16	Muller Stitcher/Trimmer, model 1529.0416 (Bravo-T Plus), 11,000 sheets per hour; 12” x 19”	
E17	Muller Stitcher/Trimmer, Amrys 15,000 sheets per hour; 20” x 23”	
E19	Vyjuk FA35 insert folder	
E20	Rollem CD perforator	
E21	Rollem TR perforator	
E18	Balemaster Baler, model AT-1-40A; 800 lb/hr	7.08

i. Standards and Operation Limits

(1) Opacity

(a) Regulation 7.08, section 3.1.1 establishes opacity limits for any process which releases materials that limit free-space light transmission.

(2) PM

(a) Regulation 7.08, section 3.1.2 establishes a mass emission limit for any process that releases particulate matter into the atmosphere.

(b) A prior construction permit relating to this equipment established a plant-wide annual PM emission limit.

e. Emission Unit U3 – Serializers

EP	Description	Applicable Regulations
E22	MCS Array #1, inkjet serializer	STAR[5] 7.25
E23	MCS Array #2, inkjet serializer	
E24	Kirk-Rudy M215B, inkjet serializer	
E25	Kirk-Rudy 219-N UV-inkjet serializer	

i. Standards

(1) TAC

(a) See Plantwide conditions.

(2) VOC

(a) Regulation 7.25 establishes a VOC emission limit for VOC-containing materials used at the facility.

[5] STAR comprises regulations 5.00, 5.01, 5.20, 5.21, 5.22, and 5.23

f. Emission Unit IA – Insignificant Activities

EP	Description	Applicable Regulations
IA-1	15 gallon cold solvent parts washer equipped with secondary reservoir	6.18
IA-2	12 HP, gasoline powered portable emergency generator, TroyBuilt 2100 Series	STAR, 40 CFR 63, subpart ZZZZ 40 CFR 60, subpart JJJJ
IA-3	12 HP, gasoline powered portable emergency generator, Generac XP8000	

i. Standards

(1) Unit Operation

(a) 40 CFR 63 Subpart ZZZZ specifies operating requirements for reciprocating engines at HAP sources.

(b) 40 CFR 60 Subpart JJJJ specifies operating and maintenance requirements for spark-ignition internal combustion engines.

(2) TAC

(a) All TAC requirements are covered in the Plantwide section.

(b) All TAC emissions from insignificant activities are *de minimis* by definition. (Regulation 5.21, section 2.3)

(3) VOC

(a) Regulation 6.18 specifies emission and work-practice standards for cold solvent parts washers.

III Other Requirements

1. Temporary Sources:

The source did not request to operate any temporary facilities.

2. Short Term Activities:

The source did not report any short term activities.

3. Emissions Trading:

The source is not subject to emission trading.

4. Alternative Operating Scenarios:

The source did not request any alternative operating scenarios.

5. Compliance History:

Date	Regulation Violated	Settlement
10/10/2006	2.03 §5.2	Agreed settlement

6. Calculation Methodology or Other Approved Method:

(1) To calculate VOC and HAP emissions from the presses in Emission unit U1:

$$ink\ VOC\ emissions = \left[\left(\#sheets\right)\left(\frac{paper\ area}{L \times W}\right)\left(\frac{fraction\ of\ paper\ covered\ with\ ink}{(estimated)}\right)\left(\frac{ink\ density\ on\ paper}{(0.001\ lb/ft^2)}\right)\left(\frac{ink\ VOC}{content}\right)\left(\frac{VOC\ not\ retained\ in\ ink}{(90\%)}\right) / \left(\frac{lb}{ton}\right)\right]\ \frac{ton}{year}$$

$$Fountain\ solution\ VOC\ emissions = \left[\left(\#sheets\right)\left(\frac{paper\ area}{L \times W}\right)\left(\frac{FS\ density\ on\ paper}{(2.25x10^{-5} gal/ft^2)}\right)\left(\frac{FS\ VOC}{contnet}\right)\left(1 - \frac{ink\ coverage\ on\ paper}{(est)}\right) / \left(\frac{lb}{ton}\right)\right]\ \frac{ton}{year}$$

$$Blanket\ wash\ VOC\ emissions = \left[\left(\frac{BW\ usage}{(gal/ft^2)}\right)\left(\frac{plate\ area}{per\ plate}\right)\left(\#\ plates\right)\left(\frac{BW\ VOC}{content}\right)\left(\frac{\#\ wash\ cycles}{day}\right) / \left(\frac{lb}{ton}\right)\right]\ \frac{ton}{year}$$

$$Roller\ wash\ VOC\ emissions = \left[\left(\frac{RW\ usage}{(gal/ft^2)}\right)\left(plate\ area\right)\left(\#\ plates\right)\left(\frac{RW\ VOC}{content}\right)\left(\frac{\#\ wash\ cycles}{day}\right) / \left(\frac{lb}{ton}\right)\right]\ \frac{ton}{year}$$

$$Plate\ Cleaner\ VOC\ emissions = \left[\left(\frac{PC\ usage}{(gal/ft^2)}\right)\left(plate\ area\right)\left(\#\ plates\right)\left(\frac{PC\ VOC}{content}\right)\left(\frac{\#\ wash\ cycles}{day}\right) / \left(\frac{lb}{ton}\right)\right]\ \frac{ton}{year}$$

To determine HAP emissions, multiply the VOC emissions by the fraction of the VOC that is HAP.

(2) For each piece of bindery equipment in U2 (E6 – E17), the emission factor is 0.0001 lbPM per pound of paper processed. One thousand sheets of 28” × 40” weighs 80 pounds.

$$PM = \left[\left(\#sheets\right)\left(\frac{pounds}{1000\ sheets}\right)\left(\frac{W \times L}{28 \times 40}\right)\left(\frac{0.0001\ lb_{PM}}{lb_{paper}}\right)\left(\frac{1\ ton}{2000\ pounds}\right)\right]\ \frac{ton}{year}$$

For the paper baler, E18, PM emissions are calculated with the same equation, except that the emission factor is 0.001 lb/lb.

(3) For the serializers, E15-E18:

$$Ink\ VOC\ emissions = \left[\left(\frac{Print\ speed}{(ft/min)}\right)\left(\frac{minutes}{operating}\right)\left(\frac{character\ height\ (ft)}{}\right)\left(\frac{ink\ coverage}{(fl.oz./ft^2)}\right)\left(1 - \frac{VOC\ retention\ in\ printed\ ink}{}\right)\left(\frac{print}{coverage}\right)\left(\frac{1\ gal}{128\ fl.oz.}\right)\left(\frac{VOC\ lb}{gal}\right)\left(\frac{1\ ton}{2000\ lb}\right)\right]\ \frac{ton}{year}$$

$$Cleaner\ VOC\ emissions = \left[\left(\frac{\#\ cleanings}{day}\right)\left(\frac{fl.oz.}{cleaning}\right)\left(\frac{1\ gal}{128\ fl.oz.}\right)\left(\frac{lb\ VOC}{gal}\right)\left(\frac{\#\ day}{year}\right)\left(\frac{1\ ton}{2000\ lb}\right)\right]\ \frac{ton}{year}$$

To determine HAP emissions, multiply the VOC emissions by the fraction of the VOC that is HAP.

(5) For the VOC storage tanks, use an emission calculation-program or use the PTE values of 0.01 tons/year for the working fountain solution storage tank and 2.93 tons per year for the Safety Clean solvent storage tank

(6) For the cold solvent parts washer, use the PTE value of 0.32 tons per year.

(7) For the emergency generators:

NOx 0.202 lb/gal

TOC 0.376 lb/gal

CO 0.123 lb/gal

(from AP42, table 3.3-1)

(8) For the natural gas burned in the building unit heaters:

$$Emissions\ (tons) = gas\ burned\ \times emission\ factor/2000$$

As specified in the EPA publication AP-42, chapter 1.4, the emission factor for NO_x is 94 lb/10^6 cubic feet. For VOC, the emission factor is 5.5 lb/10^6 cubic feet.

(9) For maintenance brazing and welding, use the PTE value of 0.2 tons per year.

7. Insignificant Activities

Equipment	Qty	PTE (ton/yr)	Regulation Basis
VOC Storage Tanks 250 Gallon or less (water-fountain solution mix)	1	VOC – 0.01	Regulation 1.02, Appendix A
15 gallon cold solvent parts washer with secondary reservoir (Safety Kleen solvent)	1	VOC 0.32	Regulation 1.02, Appendix A
Indirect heat exchangers for building heat (various sizes 30 kBTU/hr – 225 kBTU/hr. Total capacity 2.665 MMBTU/hr)	24	NO_x – 1.14 VOC – 0.06	Regulation 1.02, Appendix A
MCS Array #1, inkjet serializer (U3-E22)	1	VOC – 0.30	Regulation 1.02, Section 1.38.1.2
MCS Array #2, inkjet serializer (U3-E23)	1	VOC – 0.60	Regulation 1.02, Section 1.38.1.2
Kirk-Rudy M215B, inkjet serializer (U3-E24)	1	VOC – 0.30	Regulation 1.02, Section 1.38.1.2
Kirk-Rudy 219-N UV-inkjet serializer (U3-E25)	1	VOC – 0.16	Regulation 1.02, Section 1.38.1.2

Equipment	Qty	PTE (ton/yr)	Regulation Basis
12 HP, gasoline powered portable emergency generator	2	VOC – 0.06 NOx – 0.03	Regulation 1.02, Section 1.38.1.2

Insignificant Activity notes

1. Insignificant activities identified in District Regulation 1.02, Appendix A, may be subject to size or production rate disclosure requirements.
2. Insignificant activities identified in District Regulation 1.02, Appendix A shall comply with generally applicable requirements.
3. The owner or operator shall annually submit an updated list of insignificant activities that occurred during the preceding year, with the compliance certification due April 15th.
4. Emissions from Insignificant Activities shall be reported in conjunction with the reporting of annual emissions of the facility as required by the District.
5. The owner or operator may elect to monitor actual throughputs for each of the insignificant activities and calculate actual annual emissions, or use Potential to Emit (PTE) as the annual emissions for each piece of equipment.
6. The District has determined that no monitoring, recordkeeping, or reporting requirements apply to the insignificant activities listed, except for the equipment that has an applicable regulation and permitted under an insignificant activity (IA) unit.