



Maryland

Department of
the Environment

Larry Hogan, Governor
Boyd Rutherford, Lt. Governor

Ben Grumbles, Secretary
Horacio Tablada, Deputy Secretary

DEC 17 2021

Mr. Matthew Haynes, Director
Quality Assurance
Gamse Lithographing Company
7413 Pulaski Highway
Baltimore, MD 21237-2529

Dear Mr. Haynes:

Re: Renewal Part 70/ Title V Operating Permit 24-005-01149

Enclosed, please find the renewal Part 70/Title V Operating Permit and Fact Sheet for the Gamse Lithographing Company located in Baltimore County, MD. The permit will expire on September 30, 2026.

The Code of Maryland Regulations (COMAR) 26.11.03.11 states the following:

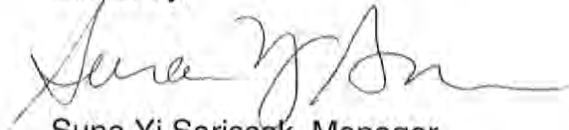
If the Department denies a Part 70 permit or issues it with terms and conditions that are objectionable to the applicant, the applicant may request that a contested case hearing be held regarding the permit. This request shall be made to the Department in writing not later than 15 days after the applicant receives notice that the permit has been denied or of the objectionable terms and conditions. The request shall include the basis for the request and refer to any objectionable terms and conditions.

Please note the following revised condition in the Permit under Section II, General Conditions, Number 5, Permit Renewal:

The Permittee shall submit to the Department a completed application for renewal of this Part 70 permit 12 months before the expiration of the permit. Upon submitting a complete application, the Permittee may continue to operate this facility pending final action by the Department on the renewal.

If you have any questions, please feel free to contact Mr. Mario Cora, the permit manager for this facility, at mario.cora@maryland.gov or (410) 537-3230.

Sincerely,

A handwritten signature in black ink, appearing to read "Suna Yi Sariscak". The signature is fluid and cursive, written over a light blue horizontal line.

Suna Yi Sariscak, Manager
Air Quality Permits Program
Air & Radiation Administration

SYS/jm

Enclosures

cc: EPA Region III (w/encl)

Mr. Michael J. Cirri
President/Chief Financial Officer
Jenkins Environmental, Inc.
8600 LaSalle Road
York Building, Suite 509
Towson, MD 21286

State of



Maryland

Larry Hogan
Governor

Ben Grumbles
Secretary

DEPARTMENT OF THE ENVIRONMENT

Air and Radiation Administration
1800 Washington Boulevard, Suite 720
Baltimore, MD 21230

Construction Permit

Part 70 Operating Permit

PERMIT NO. 24-005-01149

DATE ISSUED December 17, 2021

PERMIT FEE To be paid in accordance
with COMAR 26.11.02.19B

EXPIRATION DATE September 30, 2026

LEGAL OWNER & ADDRESS

Gamse Lithographing Company, Inc.
7413 Pulaski Highway
Baltimore, MD 21237-2529
Attn: Mr. Matthew Haynes
Director of Quality Assurance

SITE

Gamse Lithographing Company, Inc.
7413 Pulaski Highway
Baltimore, MD 21237-2529
Baltimore County
AI# 2143

SOURCE DESCRIPTION

Printing Facility.

This source is subject to the conditions described on the attached pages.

Program Manager

Director, Air and Radiation Administration

**GAMSE LITHOGRAPHING COMPANY INC.
7413 PULASKI HIGHWAY
BALTIMORE, MD 21237-2529
PART 70 OPERATING PERMIT NO. 24-005-01149**

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SECTION I SOURCE IDENTIFICATION

1. DESCRIPTION OF FACILITY

Gamse Lithographing Company (Gamse), Inc. is a commercial lithographic, flexographic printing facility. In 1955, the firm moved to its present location on Pulaski Highway. By 1960 the building expanded by 8,000 additional square feet to house a new 6 color gravure press. The Pulaski Highway building was further expanded to its present 70,000 square feet.

The facility consists of a sheet-fed lithographic printing area, a flexographic printing area, a bindery area, and a warehouse. The company currently has in operation, four (4) sheet-fed lithographic presses, and four (4) flexographic web printing presses. The bindery area is used to cut, shape, and fold the various printed materials produced at the facility. The finished goods warehouse area is located at the rear of the facility. The SIC code for the facility is 2754.

The actual VOC emissions from this facility are above the major source threshold levels, and therefore, the facility is required to obtain a Part 70 operating permit.

2. FACILITY INVENTORY LIST

Emission Unit Number	Press Number	MDE Reg. No.	Emissions Unit Name and Description	PTC Issued
FLEXOGRAPHIC PRESSES				
EU 11	69	6-3017	16-inch, 10-color Mark Andy flexographic heat-set press using water-based inks	2011
EU 12	66	6-2825	16-inch, 10-color COMCO Pro-Glide flexographic heat-set press using water-based inks	2005
EU 13	68	6-2936	13-inch, 10-color Mark Andy LP3000 flexographic printing press equipped with a UV curing system on one color unit	2008
EU 14	70	6-3123	16-inch, 10-color Mark Andy flexographic heat-set web press using water-based and UV inks	2015

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SHEET-FED LITHOGRAPHIC PRESSES				
EU15	30	6-3194	8-color lithographic printing press	2019
EU 8	40	6-1983	29-inch, 8-color lithographic printing press with aqueous coater and UV ink capability	2006
EU 5	42	6-2156	8-color Heidelberg CD sheet-fed lithographic press with a coating tower	1995
EU10	44	6-2377	2- color Heidelberg sheet-fed lithographic press	1998

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SECTION II GENERAL CONDITIONS

1. DEFINITIONS

[COMAR 26.11.01.01] and [COMAR 26.11.02.01]

The words or terms in this Part 70 permit shall have the meanings established under COMAR 26.11.01 and .02 unless otherwise stated in this permit.

2. ACRONYMS

ARMA	Air and Radiation Management Administration
BACT	Best Available Control Technology
Btu	British thermal unit
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CEM	Continuous Emissions Monitor
CFR	Code of Federal Regulations
CO	Carbon Monoxide
COMAR	Code of Maryland Regulations
EPA	United States Environmental Protection Agency
FR	Federal Register
gr	grains
HAP	Hazardous Air Pollutant
MACT	Maximum Achievable Control Technology
MDE	Maryland Department of the Environment
MVAC	Motor Vehicle Air Conditioner
NESHAPS	National Emission Standards for Hazardous Air Pollutants
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards
NSR	New Source Review
OTR	Ozone Transport Region
PM	Particulate Matter
PM10	Particulate Matter with Nominal Aerodynamic Diameter of 10 micrometers or less
ppm	parts per million
ppb	parts per billion
PSD	Prevention of Significant Deterioration
PTC	Permit to construct
PTO	Permit to operate (State)
SIC	Standard Industrial Classification
SO ₂	Sulfur Dioxide

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TAP	Toxic Air Pollutant
tpy	tons per year
VE	Visible Emissions
VOC	Volatile Organic Compounds

3. EFFECTIVE DATE

The effective date of the conditions in this Part 70 permit is the date of permit issuance, unless otherwise stated in the permit.

4. PERMIT EXPIRATION

[COMAR 26.11.03.13B(2)]

Upon expiration of this permit, the terms of the permit will automatically continue to remain in effect until a new Part 70 permit is issued for this facility provided that the Permittee has submitted a timely and complete application and has paid applicable fees under COMAR 26.11.02.16.

Otherwise, upon expiration of this permit the right of the Permittee to operate this facility is terminated.

5. PERMIT RENEWAL

[COMAR 26.11.03.02B(3)] and [COMAR 26.11.03.02E]

The Permittee shall submit to the Department a completed application for renewal of this Part 70 permit at least 12 months before the expiration of the permit. Upon submitting a completed application, the Permittee may continue to operate this facility pending final action by the Department on the renewal.

The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall submit such supplementary facts or corrected information no later than 10 days after becoming aware that this occurred. The Permittee shall also provide additional information as necessary to address any requirements that become applicable to the facility after the date a completed application was submitted, but prior to the release of a draft permit. This information shall be submitted to the Department no later than 20 days after a new requirement has been adopted.

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6. CONFIDENTIAL INFORMATION

[COMAR 26.11.02.02G]

In accordance with the provisions of the State Government Article, Sec. 10-611 et seq., Annotated Code of Maryland, all information submitted in an application shall be considered part of the public record and available for inspection and copying, unless the Permittee claims that the information is confidential when it is submitted to the Department. At the time of the request for inspection or copying, the Department will make a determination with regard to the confidentiality of the information. The Permittee, when requesting confidentiality, shall identify the information in a manner specified by the Department and, when requested by the Department, promptly provide specific reasons supporting the claim of confidentiality. Information submitted to the Department without a request that the information be deemed confidential may be made available to the public. Subject to approval of the Department, the Permittee may provide a summary of confidential information that is suitable for public review. The content of this Part 70 permit is not subject to confidential treatment.

7. PERMIT ACTIONS

[COMAR 26.11.03.06E(3)] and [COMAR 26.11.03.20(A)]

This Part 70 permit may be revoked or reopened and revised for cause. The filing of an application by the Permittee for a permit revision or renewal; or a notification of termination, planned changes or anticipated noncompliance by the facility, does not stay a term or condition of this permit.

The Department shall reopen and revise, or revoke the Permittee's Part 70 permit under the following circumstances:

- a. Additional requirements of the Clean Air Act become applicable to this facility and the remaining permit term is 3 years or more;
- b. The Department or the EPA determines that this Part 70 permit contains a material mistake, or is based on false or inaccurate information supplied by or on behalf of the Permittee;
- c. The Department or the EPA determines that this Part 70 permit must be revised or revoked to assure compliance with applicable requirements of the Clean Air Act; or

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- d. Additional requirements become applicable to an affected source under the Federal Acid Rain Program.

8. PERMIT AVAILABILITY

[COMAR 26.11.02.13G]

The Permittee shall maintain this Part 70 permit in the vicinity of the facility for which it was issued, unless it is not practical to do so, and make this permit immediately available to officials of the Department upon request.

9. REOPENING THE PART 70 PERMIT FOR CAUSE BY THE EPA

[COMAR 26.11.03.20B]

The EPA may terminate, modify, or revoke and reissue a permit for cause as prescribed in 40 CFR §70.7(g)

10. TRANSFER OF PERMIT

[COMAR 26.11.02.02E]

The Permittee shall not transfer this Part 70 permit except as provided in COMAR 26.11.03.15.

11. REVISION OF PART 70 PERMITS – GENERAL CONDITIONS

[COMAR 26.11.03.14] and [COMAR 26.11.03.06A(8)]

- a. The Permittee shall submit an application to the Department to revise this Part 70 permit when required under COMAR 26.11.03.15 -.17.
- b. When applying for a revision to a Part 70 permit, the Permittee shall comply with the requirements of COMAR 26.11.03.02 and .03 except that the application for a revision need include only information listed that is related to the proposed change to the source and revision to the permit. This information shall be sufficient to evaluate the proposed change and to determine whether it will comply with all applicable requirements of the Clean Air Act.

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- c. The Permittee may not change any provision of a compliance plan or schedule in a Part 70 permit as an administrative permit amendment or as a minor permit modification unless the change has been approved by the Department in writing.
- d. A permit revision is not required for a change that is provided for in this permit relating to approved economic incentives, marketable permits, emissions trading, and other similar programs.

12. SIGNIFICANT PART 70 OPERATING PERMIT MODIFICATIONS

[COMAR 26.11.03.17]

The Permittee may apply to the Department to make a significant modification to its Part 70 Permit as provided in COMAR 26.11.03.17 and in accordance with the following conditions:

- a. A significant modification is a revision to the federally enforceable provisions in the permit that does not qualify as an administrative permit amendment under COMAR 26.11.03.15 or a minor permit modification as defined under COMAR 26.11.03.16.
- b. This permit does not preclude the Permittee from making changes, consistent with the provisions of COMAR 26.11.03, that would make the permit or particular terms and conditions of the permit irrelevant, such as by shutting down or reducing the level of operation of a source or of an emissions unit within the source. Air pollution control equipment shall not be shut down or its level of operation reduced if doing so would violate any term of this permit.
- c. Significant permit modifications are subject to all requirements of COMAR 26.11.03 as they apply to permit issuance and renewal, including the requirements for applications, public participation, and review by affected states and EPA, except:
 - (1) An application need include only information pertaining to the proposed change to the source and modification of this permit, including a description of the change and modification, and any new applicable requirements of the Clean Air Act that will apply if the change occurs;
 - (2) Public participation, and review by affected states and EPA, is limited to only the application and those federally enforceable

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terms and conditions of the Part 70 permit that are affected by the significant permit modification.

- d. As provided in COMAR 26.11.03.15B(5), an administrative permit amendment may be used to make a change that would otherwise require a significant permit modification if procedures for enhanced preconstruction review of the change are followed that satisfy the requirements of 40 CFR 70.7(d)(1)(v).
- e. Before making a change that qualifies as a significant permit modification, the Permittee shall obtain all permits-to-construct and approvals required by COMAR 26.11.02.
- f. The Permittee shall not make a significant permit modification that results in a violation of any applicable requirement of the Clean Air Act.
- g. The permit shield in COMAR 26.11.03.23 applies to a final significant permit modification that has been issued by the Department, to the extent applicable under COMAR 26.11.03.23.

13. MINOR PERMIT MODIFICATIONS

[COMAR 26.11.03.16]

The Permittee may apply to the Department to make a minor modification to the federally enforceable provisions of this Part 70 permit as provided in COMAR 26.11.03.16 and in accordance with the following conditions:

- a. A minor permit modification is a Part 70 permit revision that:
 - (1) Does not result in a violation of any applicable requirement of the Clean Air Act;
 - (2) Does not significantly revise existing federally enforceable monitoring, including test methods, reporting, record keeping, or compliance certification requirements except by:
 - (a) Adding new requirements,
 - (b) Eliminating the requirements if they are rendered meaningless because the emissions to which the requirements apply will no longer occur, or

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- (c) Changing from one approved test method for a pollutant and source category to another;
 - (3) Does not require or modify a:
 - (a) Case-by-case determination of a federally enforceable emissions standard,
 - (b) Source specific determination for temporary sources of ambient impacts, or
 - (c) Visibility or increment analysis;
 - (4) Does not seek to establish or modify a federally enforceable permit term or condition for which there is no corresponding underlying applicable requirement of the Clean Air Act, but that the Permittee has assumed to avoid an applicable requirement to which the source would otherwise be subject, including:
 - (a) A federally enforceable emissions standard applied to the source pursuant to COMAR 26.11.02.03 to avoid classification as a Title I modification; and
 - (b) An alternative emissions standard applied to an emissions unit pursuant to regulations promulgated under Section 112(i)(5) of the Clean Air Act
 - (5) Is not a Title I modification; and
 - (6) Is not required under COMAR 26.11.03.17 to be processed as a significant modification to this Part 70 permit.
- b. Application for a Minor Permit Modification

The Permittee shall submit to the Department an application for a minor permit modification that satisfies the requirements of COMAR 26.11.03.03 which includes the following:

- (1) A description of the proposed change, the emissions resulting from the change, and any new applicable requirements that will apply if the change is made;
- (2) The proposed minor permit modification;

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- (3) Certification by a responsible official, in accordance with COMAR 26.11.02.02F, that:
 - (a) The proposed change meets the criteria for a minor permit modification, and
 - (b) The Permittee has obtained or applied for all required permits-to-construct required by COMAR 26.11.03.16 with respect to the proposed change;
- (4) Completed forms for the Department to use to notify the EPA and affected states, as required by COMAR 26.11.03.07-.12.

c. Permittee's Ability to Make Change

- (1) For changes proposed as minor permit modifications to this permit that will require the applicant to obtain a permit to construct, the permit to construct must be issued prior to the new change.
- (2) During the period of time after the Permittee applies for a minor modification but before the Department acts in accordance with COMAR 26.11.03.16F(2):
 - (a) The Permittee shall comply with applicable requirements of the Clean Air Act related to the change and the permit terms and conditions described in the application for the minor modification.
 - (b) The Permittee is not required to comply with the terms and conditions in the permit it seeks to modify. If the Permittee fails to comply with the terms and conditions in the application during this time, the terms and conditions of both this permit and the application for modification may be enforced against it.

d. The Permittee is subject to enforcement action if it is determined at any time that a change made under COMAR 26.11.03.16 is not within the scope of this regulation.

e. Minor permit modification procedures may be used for Part 70 permit modifications involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches, but only to

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the extent that the minor permit modification procedures are explicitly provided for in regulations approved by the EPA as part of the Maryland SIP or in other applicable requirements of the Clean Air Act.

14. ADMINISTRATIVE PART 70 OPERATING PERMIT AMENDMENTS

[COMAR 26.11.03.15]

The Permittee may apply to the department to make an administrative permit amendment as provided in COMAR 26.11.03.15 and in accordance with the following conditions:

- a. An application for an administrative permit amendment shall:
 - (1) Be in writing;
 - (2) Include a statement certified by a responsible official that the proposed amendment meets the criteria in COMAR 26.11.03.15 for an administrative permit amendment, and
 - (3) Identify those provisions of this part 70 permit for which the amendment is requested, including the basis for the request.

- b. An administrative permit amendment:
 - (1) Is a correction of a typographical error;
 - (2) Identifies a change in the name, address, or phone number of a person identified in this permit, or a similar administrative change involving the Permittee or other matters which are not directly related to the control of air pollution;
 - (3) requires more frequent monitoring or reporting by the Permittee;
 - (4) Allows for a change in ownership or operational control of a source for which the Department determines that no other revision to the permit is necessary and is documented as per COMAR 26.11.03.15B(4);
 - (5) Incorporates into this permit the requirements from preconstruction review permits or approvals issued by the

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Department in accordance with COMAR 26.11.03.15B(5), but only if it satisfies 40 CFR 70.7(d)(1)(v);

- (6) Incorporates any other type of change, as approved by the EPA, which is similar to those in COMAR 26.11.03.15B(1)—(4);
 - (7) Notwithstanding COMAR 26.11.03.15B(1)—(6), all modifications to acid rain control provisions included in this Part 70 permit are governed by applicable requirements promulgated under Title IV of the Clean Air Act; or
 - (8) Incorporates any change to a term or condition specified as State-only enforceable, if the Permittee has obtained all necessary permits-to-construct and approvals that apply to the change.
- c. The Permittee may make the change addressed in the application for an administrative amendment upon receipt by the Department of the application, if all permits-to-construct or approvals otherwise required by COMAR 26.11.02 prior to making the change have first been obtained from the Department.
 - d. The permit shield in COMAR 26.11.03.23 applies to administrative permit amendments made under Section B(5) of COMAR 26.11.03.15 , but only after the Department takes final action to revise the permit.
 - e. The Permittee is subject to enforcement action if it is determined at any time that a change made under COMAR 26.11.03.15 is not within the scope of this regulation.

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15. OFF-PERMIT CHANGES TO THIS SOURCE

[COMAR 26.11.03.19]

The Permittee may make off-permit changes to this facility as provided in COMAR 26.11.03.19 and in accordance with the following conditions:

- a. The Permittee may make a change to this permitted facility that is not addressed or prohibited by the federally enforceable conditions of this Part 70 permit without obtaining a Part 70 permit revision if:
 - (1) The Permittee has obtained all permits and approvals required by COMAR 26.11.02 and .03;
 - (2) The change is not subject to any requirements under Title IV of the Clean Air Act;
 - (3) The change is not a Title I modification; and
 - (4) The change does not violate an applicable requirement of the Clean Air Act or a federally enforceable term or condition of the permit.
- b. For a change that qualifies under COMAR 26.11.03.19, the Permittee shall provide contemporaneous written notice to the Department and the EPA, except for a change to an emissions unit or activity that is exempt from the Part 70 permit application, as provided in COMAR 26.11.03.04. This written notice shall describe the change, including the date it was made, any change in emissions, including the pollutants emitted, and any new applicable requirements of the Clean Air Act that apply as a result of the change.
- c. Upon satisfying the requirements of COMAR 26.11.03.19, the Permittee may make the proposed change.
- d. The Permittee shall keep a record describing:
 - (1) Changes made at the facility that result in emissions of a regulated air pollutant subject to an applicable requirement of the Clean Air Act, but not otherwise regulated under this permit; and
 - (2) The emissions resulting from those changes.

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- e. Changes that qualify under COMAR 26.11.03.19 are not subject to the requirements for Part 70 revisions.
- f. The Permittee shall include each off-permit change under COMAR 26.11.03.19 in the application for renewal of the part 70 permit.
- g. The permit shield in COMAR 26.11.03.23 does not apply to off-permit changes made under COMAR 26.11.03.19.
- h. The Permittee is subject to enforcement action if it is determined that an off-permit change made under COMAR 26.11.03.19 is not within the scope of this regulation.

16. ON-PERMIT CHANGES TO SOURCES

[COMAR 26.11.03.18]

The Permittee may make on-permit changes that are allowed under Section 502(b)(10) of the Clean Air Act as provided in COMAR 26.11.03.18 and in accordance with the following conditions:

- a. The Permittee may make a change to this facility without obtaining a revision to this Part 70 permit if:
 - (1) The change is not a Title I modification;
 - (2) The change does not result in emissions in excess of those expressly allowed under the federally enforceable provisions of the Part 70 permit for the permitted facility or for an emissions unit within the facility, whether expressed as a rate of emissions or in terms of total emissions;
 - (3) The Permittee has obtained all permits and approvals required by COMAR 26.11.02 and .03;
 - (4) The change does not violate an applicable requirement of the Clean Air Act;
 - (5) The change does not violate a federally enforceable permit term or condition related to monitoring, including test methods, record keeping, reporting, or compliance certification requirements;

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- (6) The change does not violate a federally enforceable permit term or condition limiting hours of operation, work practices, fuel usage, raw material usage, or production levels if the term or condition has been established to limit emissions allowable under this permit;
 - (7) If applicable, the change does not modify a federally enforceable provision of a compliance plan or schedule in this Part 70 permit unless the Department has approved the change in writing; and
 - (8) This permit does not expressly prohibit the change under COMAR 26.11.03.18.
- b. The Permittee shall notify the Department and the EPA in writing of a proposed on-permit change under COMAR 26.11.03.18 not later than 7 days before the change is made. The written information shall include the following information:
- (1) A description of the proposed change;
 - (2) The date on which the change is proposed to be made;
 - (3) Any change in emissions resulting from the change, including the pollutants emitted;
 - (4) Any new applicable requirement of the Clean Air Act; and
 - (5) Any permit term or condition that would no longer apply.
- c. The responsible official of this facility shall certify in accordance with COMAR 26.11.02.02F that the proposed change meets the criteria for the use of on-permit changes under COMAR 26.11.03.18.
- d. The Permittee shall attach a copy of each notice required by condition b. above to this Part 70 permit.
- e. On-permit changes that qualify under COMAR 26.11.03.18 are not subject to the requirements for part 70 permit revisions.
- f. Upon satisfying the requirements under COMAR 26.11.03.18, the Permittee may make the proposed change.

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- g. The permit shield in COMAR 26.11.03.23 does not apply to on-permit changes under COMAR 26.11.03.18.
- h. The Permittee is subject to enforcement action if it is determined that an on-permit change made under COMAR 26.11.03.18 is not within the scope of the regulation or violates any requirement of the State air pollution control law.

17. FEE PAYMENT

[COMAR 26.11.02.16A(2) & (5)(b)]

- a. The fee for this Part 70 permit is as prescribed in Regulation .19 of COMAR 26.11.02.
- b. The fee is due on and shall be paid on or before each 12-month anniversary date of the permit.
- c. Failure to pay the annual permit fee constitutes cause for revocation of the permit by the Department.

18. REQUIREMENTS FOR PERMITS-TO-CONSTRUCT AND APPROVALS

[COMAR 26.11.02.09.]

The Permittee may not construct or modify or cause to be constructed or modified any of the following sources without first obtaining, and having in current effect, the specified permits-to-construct and approvals:

- a. New Source Review source, as defined in COMAR 26.11.01.01, approval required, except for generating stations constructed by electric companies;
- b. Prevention of Significant Deterioration source, as defined in COMAR 26.11.01.01, approval required, except for generating stations constructed by electric companies;
- c. New Source Performance Standard source, as defined in COMAR 26.11.01.01, permit to construct required, except for generating stations constructed by electric companies;

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- d. National Emission Standards for Hazardous Air Pollutants source, as defined in COMAR 26.11.01.01, permit to construct required, except for generating stations constructed by electric companies;
- e. A stationary source of lead that discharges one ton per year or more of lead or lead compounds measured as elemental lead, permit to construct required, except for generating stations constructed by electric companies;
- f. All stationary sources of air pollution, including installations and air pollution control equipment, except as listed in COMAR 26.11.02.10, permit to construct required;
- g. In the event of a conflict between the applicability of (a.— e.) above and an exemption listed in COMAR 26.11.02.10, the provision that requires a permit applies.
- h. Approval of a PSD or NSR source by the Department does not relieve the Permittee obtaining an approval from also obtaining all permits-to-construct required by (c.— g.) above.

19. CONSOLIDATION OF PROCEDURES FOR PUBLIC PARTICIPATION

[COMAR 26.11.02.11C] and [COMAR 26.11.03.01K]

The Permittee may request the Department to authorize special procedures for the Permittee to apply simultaneously, to the extent possible, for a permit to construct and a revision to this permit.

These procedures may provide for combined public notices, informational meetings, and public hearings for both permits but shall not adversely affect the rights of a person, including EPA and affected states, to obtain information about the application for a permit, to comment on an application, or to challenge a permit that is issued.

These procedures shall not alter any existing permit procedures or time frames.

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20. PROPERTY RIGHTS

[COMAR 26.11.03.06E(4)]

This Part 70 permit does not convey any property rights of any sort, or any exclusive privileges.

21. SEVERABILITY

[COMAR 26.11.03.06A(5)]

If any portion of this Part 70 permit is challenged, or any term or condition deemed unenforceable, the remainder of the requirements of the permit continues to be valid.

22. INSPECTION AND ENTRY

[COMAR 26.11.03.06G(3)]

The Permittee shall allow employees and authorized representatives of the Department, the EPA, and local environmental health agencies, upon presentation of credentials or other documents as may be required by law, to:

- a. Enter at a reasonable time without delay and without prior notification the Permittee's property where a Part 70 source is located, emissions-related activity is conducted, or records required by this permit are kept;
- b. Have access to and make copies of records required by the permit;
- c. Inspect all emissions units within the facility subject to the permit and all related monitoring systems, air pollution control equipment, and practices or operations regulated or required by the permit; and
- d. Sample or monitor any substances or parameters at or related to the emissions units at the facility for the purpose of determining compliance with the permit.

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23. DUTY TO PROVIDE INFORMATION

[COMAR 26.11.03.06E(5)]

The Permittee shall furnish to the Department, within a reasonable time specified by the Department, information requested in writing by the Department in order to determine whether the Permittee is in compliance with the federally enforceable conditions of this Part 70 permit, or whether cause exists for revising or revoking the permit. Upon request, the Permittee shall also furnish to the Department records required to be kept under the permit.

For information claimed by the Permittee to be confidential and therefore potentially not discloseable to the public, the Department may require the Permittee to provide a copy of the records directly to the EPA along with a claim of confidentiality.

The Permittee shall also furnish to the Department, within a reasonable time specified by the Department, information or records requested in writing by the Department in order to determine if the Permittee is in compliance with the State-only enforceable conditions of this permit.

24. COMPLIANCE REQUIREMENTS

[COMAR 26.11.03.06E(1)] and [COMAR 26.11.03.06A(11)] and [COMAR 26.11.02.05]

The Permittee shall comply with the conditions of this Part 70 permit. Noncompliance with the permit constitutes a violation of the Clean Air Act, and/or the Environment Article Title 2 of the Annotated Code of Maryland and may subject the Permittee to:

- a. Enforcement action,
- b. Permit revocation or revision,
- c. Denial of the renewal of a Part 70 permit, or
- d. Any combination of these actions.

The conditions in this Part 70 permit are enforceable by EPA and citizens under the Clean Air Act except for the State-only enforceable conditions.

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Under Environment Article Section 2-609, Annotated Code of Maryland, the Department may seek immediate injunctive relief against a person who violates this permit in such a manner as to cause a threat to human health or the environment.

25. CREDIBLE EVIDENCE

Nothing in this permit shall be interpreted to preclude the use of credible evidence to demonstrate noncompliance with any term of this permit.

26. NEED TO HALT OR REDUCE ACTIVITY NOT A DEFENSE

[COMAR 26.11.03.06E(2)]

The need to halt or reduce activity in order to comply with the conditions of this permit may not be used as a defense in an enforcement action.

27. CIRCUMVENTION

[COMAR 26.11.01.06]

The Permittee may not install or use any article, machine, equipment or other contrivance, the use of which, without resulting in a reduction in the total weight of emissions, conceals or dilutes emissions which would otherwise constitute a violation of any applicable air pollution control regulation.

28. PERMIT SHIELD

[COMAR 26.11.03.23]

A permit shield as described in COMAR 26.11.03.23 shall apply only to terms and conditions in this Part 70 permit that have been specifically identified as covered by the permit shield. Neither this permit nor COMAR 26.11.03.23 alters the following:

- a. The emergency order provisions in Section 303 of the Clean Air Act, including the authority of EPA under that section;

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- b. The liability of the Permittee for a violation of an applicable requirement of the Clean Air Act before or when this permit is issued or for a violation that continues after issuance;
- c. The requirements of the Acid Rain Program, consistent with Section 408(a) of the Clean Air Act;
- d. The ability of the Department or EPA to obtain information from a source pursuant to Maryland law and Section 114 of the Clean Air Act; or
- e. The authority of the Department to enforce an applicable requirement of the State air pollution control law that is not an applicable requirement of the Clean Air Act.

29. ALTERNATE OPERATING SCENARIOS

[COMAR 26.11.03.06A(9)]

For all alternate operating scenarios approved by the Department and contained within this permit, the Permittee, while changing from one approved scenario to another, shall contemporaneously record in a log maintained at the facility each scenario under which the emissions unit is operating and the date and time the scenario started and ended.

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SECTION III PLANT WIDE CONDITIONS

1. PARTICULATE MATTER FROM CONSTRUCTION AND DEMOLITION

[COMAR 26.11.06.03D]

The Permittee shall not cause or permit any building, its appurtenances, or a road to be used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne.

2. OPEN BURNING

[COMAR 26.11.07]

Except as provided in COMAR 26.11.07.04, the Permittee shall not cause or permit an open fire from June 1 through August 31 of any calendar year. Prior to any open burning, the Permittee shall request and receive approval from the Department.

3. AIR POLLUTION EPISODE

[COMAR 26.11.05.04]

When requested by the Department, the Permittee shall prepare in writing standby emissions reduction plans, consistent with good industrial practice and safe operating procedures, for reducing emissions creating air pollution during periods of Alert, Warning, and Emergency of an air pollution episode.

4. REPORT OF EXCESS EMISSIONS AND DEVIATIONS

[COMAR 26.11.01.07] and [COMAR 26.11.03.06C(7)]

The Permittee shall comply with the following conditions for occurrences of excess emissions and deviations from requirements of this permit, including those in Section VI – State-only Enforceable Conditions:

- a. Report any deviation from permit requirements that could endanger human health or the environment, by orally notifying the Department immediately upon discovery of the deviation;

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- b. Promptly report all occurrences of excess emissions that are expected to last for one hour or longer by orally notifying the Department of the onset and termination of the occurrence;
- c. When requested by the Department the Permittee shall report all deviations from permit conditions, including those attributed to malfunctions as defined in COMAR 26.11.01.07A, within 5 days of the request by submitting a written description of the deviation to the Department. The written report shall include the cause, dates and times of the onset and termination of the deviation, and an account of all actions planned or taken to reduce, eliminate, and prevent recurrence of the deviation;
- d. The Permittee shall submit to the Department semi-annual monitoring reports that confirm that all required monitoring was performed, and that provide accounts of all deviations from permit requirements that occurred during the reporting periods. Reporting periods shall be January 1 through June 30 and July 1 through December 31, and reports shall be submitted within 30 days of the end of each reporting period. Each account of deviation shall include a description of the deviation, the dates and times of onset and termination, identification of the person who observed or discovered the deviation, causes and corrective actions taken, and actions taken to prevent recurrence. If no deviations from permit conditions occurred during a reporting period, the Permittee shall submit a written report that so states.
- e. When requested by the Department, the Permittee shall submit a written report to the Department within 10 days of receiving the request concerning an occurrence of excess emissions. The report shall contain the information required in COMAR 26.11.01.07D(2).

5. ACCIDENTAL RELEASE PROVISIONS

[COMAR 26.11.03.03B(23)] and [40 CFR 68]

Should the Permittee become subject to 40 CFR 68 during the term of this permit, the Permittee shall submit risk management plans by the date specified in 40 CFR 68.150 and shall certify compliance with the requirements of 40 CFR 68 as part of the annual compliance certification as required by 40 CFR 70.

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The Permittee shall initiate a permit revision or reopening according to the procedures of 40 CFR 70.7 to incorporate appropriate permit conditions into the Permittee's Part 70 permit.

6. GENERAL TESTING REQUIREMENTS

[COMAR 26.11.01.04]

The Department may require the Permittee to conduct, or have conducted, testing to determine compliance with this Part 70 permit. The Department, at its option, may witness or conduct these tests. This testing shall be done at a reasonable time, and all information gathered during a testing operation shall be provided to the Department.

7. EMISSIONS TEST METHODS

[COMAR 26.11.01.04]

Compliance with the emissions standards and limitations in this Part 70 permit shall be determined by the test methods designated and described below or other test methods submitted to and approved by the Department.

Reference documents of the test methods approved by the Department include the following:

- a. 40 CFR 60, appendix A
- b. 40 CFR 51, appendix M
- c. The Department's Technical Memorandum 91-01 "Test Methods and Equipment Specifications for Stationary Sources", (January 1991), as amended through Supplement 3, (October 1, 1997)

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8. EMISSIONS CERTIFICATION REPORT

**[COMAR 26.11.01.05-1] and [COMAR 26.11.02.19C] and
[COMAR 26.11.02.19D]**

The Permittee shall certify actual annual emissions of regulated pollutants from the facility on a calendar year basis.

- a. The certification shall be on forms obtained from the Department and submitted to the Department not later than April 1 of the year following the year for which the certification is required;
- b. The individual making the certification shall certify that the information is accurate to the individual's best knowledge. The individual shall be:
 - (1) Familiar with each source for which the certifications forms are submitted, and
 - (2) Responsible for the accuracy of the emissions information;
- c. The Permittee shall maintain records necessary to support the emissions certification including the following information if applicable:
 - (1) The total amount of actual emissions of each regulated pollutant and the total of all regulated pollutants;
 - (2) An explanation of the methods used to quantify the emissions and the operating schedules and production data that were used to determine emissions, including significant assumptions made;
 - (3) Amounts, types and analyses of all fuels used;
 - (4) Emissions data from continuous emissions monitors that are required by this permit, including monitor calibration and malfunction information;
 - (5) Identification, description, and use records of all air pollution control equipment and compliance monitoring equipment including:
 - (a) Significant maintenance performed,

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- (b) Malfunctions and downtime, and
 - (c) Episodes of reduced efficiency of all equipment;
- (6) Limitations on source operation or any work practice standards that significantly affect emissions; and
- (7) Other relevant information as required by the Department.

9. COMPLIANCE CERTIFICATION REPORT

[COMAR 26.11.03.06G(6) and (7)]

The Permittee shall submit to the Department and EPA Region III a report certifying compliance with each term of this Part 70 permit including each applicable standard, emissions limitation, and work practice for the previous calendar year by April 1 of each year.

- a. The compliance certification shall include:
- (1) The identification of each term or condition of this permit which is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether the compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of each source, currently and over the reporting period; and
 - (5) Any other information required to be reported to the Department that is necessary to determine the compliance status of the Permittee with this permit.
- b. The Permittee shall submit the compliance certification reports to the Department and EPA simultaneously.

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10. CERTIFICATION BY RESPONSIBLE OFFICIAL

[COMAR 26.11.02.02F]

All application forms, reports, and compliance certifications submitted pursuant to this permit shall be certified by a responsible official as to truth, accuracy, and completeness. The Permittee shall expeditiously notify the Department of an appointment of a new responsible official.

The certification shall be in the following form:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

11. SAMPLING AND EMISSIONS TESTING RECORD KEEPING

[COMAR 26.11.03.06C(5)]

The Permittee shall gather and retain the following information when sampling and testing for compliance demonstrations:

- a. The location as specified in this permit, and the date and time that samples and measurements are taken;
- b. All pertinent operating conditions existing at the time that samples and measurements are taken;
- c. The date that each analysis of a sample or emissions test is performed and the name of the person taking the sample or performing the emissions test;
- d. The identity of the Permittee, individual, or other entity that performed the analysis;
- e. The analytical techniques and methods used; and

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- f. The results of each analysis.

12. GENERAL RECORDKEEPING

[COMAR 26.11.03.06C(6)]

The Permittee shall retain records of all monitoring data and information that support the compliance certification for a period of five (5) years from the date that the monitoring, sample measurement, application, report or emissions test was completed or submitted to the Department.

These records and support information shall include:

- a. All calibration and maintenance records;
- b. All original data collected from continuous monitoring instrumentation;
- c. Records which support the annual emissions certification; and
- d. Copies of all reports required by this permit.

13. GENERAL CONFORMITY

[COMAR 26.11.26.09]

The Permittee shall comply with the general conformity requirements of 40 CFR 93, Subpart B and COMAR 26.11.26.09.

14. ASBESTOS PROVISIONS

[40 CFR 61, Subpart M]

The Permittee shall comply with 40 CFR 61, Subpart M when conducting any renovation or demolition activities at the facility.

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15. OZONE DEPLETING REGULATIONS

[40 CFR 82, Subpart F]

The Permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR 82, Subpart F, except as provided for MVACs in subpart B:

- a. Persons opening appliances for maintenance, service, repair, or disposal shall comply with the prohibitions and required practices pursuant to 40 CFR 82.154 and 82.156.
- b. Equipment used during the maintenance, service, repair or disposal of appliances shall comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- c. Persons performing maintenance, service, repairs or disposal of appliances shall be certified by an approved technician certification program pursuant to 40 CFR 82.161.
- d. Persons performing maintenance, service, repairs or disposal of appliances shall certify with the Administrator pursuant to 40 CFR 82.162.
- e. Persons disposing of small appliances, MVACS, and MVAC-like appliances as defined in 40 CFR 82.152, shall comply with record keeping requirements pursuant to 40 CFR 82.166.
- f. Persons owning commercial or industrial process refrigeration equipment shall comply with the leak repair requirements pursuant to 40 CFR 82.156.
- g. Owners/operators of appliances normally containing 50 or more pounds of refrigerant shall keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR 82.166.

16. ACID RAIN PERMIT

Not applicable

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SECTION IV PLANT SPECIFIC CONDITIONS

This section provides tables that include the emissions standards, emissions limitations, and work practices applicable to each emissions unit located at this facility. The Permittee shall comply with all applicable emissions standards, emissions limitations and work practices included herein.

The tables also include testing, monitoring, record keeping and reporting requirements specific to each emissions unit. In addition to the requirements included here in **Section IV**, the Permittee is also subject to the general testing, monitoring, record keeping and reporting requirements included in **Section III – Plant Wide Conditions** of this permit.

Unless otherwise provided in the specific requirements for an emissions unit, the Permittee shall maintain at the facility for at least five (5) years, and shall make available to the Department upon request, all records that the Permittee is required under this section to establish. [Authority: COMAR 26.11.03.06C(5)(g)]

Table IV-1 Facility Wide Requirements	
1.0	<p><u>Emissions Units:</u></p> <p>Facility Wide</p>
1.1	<p><u>Applicable Standards/Limits:</u></p> <p><u>Control of VOC Emissions</u> COMAR 26.11.19.16C&D – Control of VOC Equipment Leaks "General Requirements. A person subject to this regulation shall comply with all of the following requirements:</p> <ol style="list-style-type: none"> (1) Visually inspect all components on the premises for leaks at least once each calendar month. (2) Tag any leak immediately so that the tag is clearly visible. The tag shall be made of a material that will withstand any weather or corrosive conditions to which it may be normally exposed. The tag shall bear an identification number, the date the leak was discovered, and the name of the person who discovered the leak. The tag shall remain in place until the leak has been repaired. (3) Take immediate action to repair all observed VOC leaks that can be repaired within 48 hours. (4) Repair all other leaking components not later than 15 days after the leak is discovered. If a replacement part is needed, the part shall be ordered within 3 days after discovery of the leak, and the leak shall be repaired within 48 hours after receiving the part.

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Table IV-1 Facility Wide Requirements	
	<p>(5) Maintain a supply of components or component parts that are recognized by the source to wear or corrode, or that otherwise need to be routinely replaced, such as seals, gaskets, packing, and pipefitting.</p> <p>(6) Maintain a log that includes the name of the person conducting the inspection and the date on which leak inspections are made, the findings of the inspection, and a list of leaks by tag identification number. The log shall be made available to the Department upon request. Leak records shall be maintained for a period of not less than 2 years from the date of their occurrence."</p> <p><u>"Exceptions.</u> Components that cannot be repaired as required in this regulation because they are inaccessible, or that cannot be repaired during operation of the source, shall be identified in the log and included within the source's maintenance schedule for repair during the next source shutdown."</p>
1.2	<p><u>Testing Requirements:</u></p> <p><u>Control of VOC Emissions</u> See monitoring requirements in Section 1.3</p>
1.3	<p><u>Monitoring Requirements:</u></p> <p><u>Control of VOC Emissions</u> The Permittee shall visually inspect all components on the premises for VOC leaks at least once each calendar month following the procedures specified in COMAR 26.11.19.16C and D.</p>
1.4	<p><u>Record Keeping Requirements:</u></p> <p>Note: All records must be maintained onsite for a period of at least 5 years and shall be made available to the Department upon request. [Reference: COMAR 26.11.03.06C(5)(g)]</p> <p><u>Control of VOC Emissions</u> The Permittee shall:</p> <p>1) Maintain a log that includes the name of the person conducting the inspection, the date on which VOC leak inspections was made, the findings of the inspection, a list of VOC leaks by tag identification number, the date the part was ordered, and the date the VOC leak was repaired; and</p>

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Table IV-1 Facility Wide Requirements	
	2) Make the log available to the Department upon request and shall be maintained for a period of not less than two years from the date of the VOC leaks' occurrence. [Reference: COMAR 26.11.19.16C(6)]
1.5	<p><u>Reporting Requirements:</u></p> <p><u>Control of VOC Emissions</u> VOC leak inspection logs as required by COMAR 26.11.19.16 shall be made available to the Department upon request.</p>

A permit shield shall cover the applicable requirements identified for the emission units listed in the table above.

Table IV-2 Flexographic Presses	
2.0	<p><u>Emissions Units:</u></p> <p>EU 11 Press #69 MDE Reg. No. 6-3017 16-inch, 10-color Mark Andy flexographic heat-set press using water-based inks, installed in 2011.</p> <p>EU 12 Press#66 MDE Reg. No. 6-2825 16-inch, 10-color COMCO Pro-Glide flexographic heat-set press using water-based inks, installed in 2005.</p> <p>EU 13 Press#68 MDE Reg. No. 6-2936 13-inch, 10-color Mark Andy LP3000 flexographic printing press equipped with a UV curing system on one color unit, installed in 2008.</p> <p>EU-14 Press #70 MDE Reg. No. 6-3123 16-inch, 10-color Mark Andy flexographic heat-set web press using water-based and UV inks, installed in 2015.</p>
2.1	<p><u>Applicable Standards/Limits:</u></p> <p><u>Control of VOC Emissions</u> COMAR 26.11.19.10C – Requirements for Sheet-Fed or Web-Fed Flexographic, Packaging Rotogravure, and Publication Rotogravure Printing.</p>

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Table IV-2 Flexographic Presses	
	<p>“A person who owns or operates a printing press that uses flexographic, packaging rotogravure, or publication rotogravure methods and is a major stationary source as defined in Regulation .01B(4) of this chapter, shall:</p> <p>(1) Reduce emissions by using water-based inks that contain less than 25 percent VOC by volume of volatile portion of the ink, or high solids inks that contain not less than 60 percent nonvolatile; or</p> <p>(2) If compliance with the requirements of Sec. C(1) of this regulation cannot be achieved, reduce the VOC content of each ink, or reduce the average VOC content of inks used at each press as follows:</p> <p style="margin-left: 20px;">a. 60 percent reduction for flexographic presses,</p> <p style="margin-left: 20px;">b. 65 percent reduction for packaging rotogravure presses, and</p> <p style="margin-left: 20px;">c. 75 percent reduction for publication rotogravure presses.”</p>
2.2	<p><u>Testing Requirements:</u></p> <p><u>Control of VOC Emissions</u> See Record keeping requirements in Section 3.4.</p>
2.3	<p><u>Monitoring Requirements:</u></p> <p><u>Control of VOC Emissions</u> See Record keeping requirements in Section 3.4.</p>
2.4	<p><u>Record Keeping Requirements:</u></p> <p><u>Note:</u> All records must be maintained onsite for a period of at least 5 years and shall be made available to the Department upon request. [Reference: COMAR 26.11.03.06C(5)(g)]</p> <p><u>Control of VOC Emissions</u> The Permittee shall:</p> <p style="margin-left: 20px;">(1) Maintain MSD sheets or other manufacturer’s certified product sheets for each material used where the VOC content specified on MSD or product sheets has been determined based on EPA Reference Method 24 or an equivalent methodology approved by the Department; and</p> <p style="margin-left: 20px;">(2) Maintain records pertaining to the low solvent or high solids characteristics of VOC materials used that are adequate to demonstrate that emissions are below the applicable threshold as stated in COMAR 26.11.19.10C(1). [Reference: COMAR 26.11.03.06C]</p>

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Table IV-2 Flexographic Presses	
2.5	<p><u>Reporting Requirements:</u></p> <p><u>Control of VOC Emissions</u> The Permittee shall report the quantity and identity of all VOC- containing materials that are used during a year in the annual emissions certification report. [Reference: COMAR 26.11.03.06C]</p>

A permit shield shall cover the applicable requirements identified for the emission units listed in the table above.

Table IV-3 Sheet-Fed Lithographic Presses	
3.0	<p><u>Emissions Units:</u></p> <p>EU 15 Press# 30 MDE Reg. No. 6-3194 40-inch, 8-color sheet-fed lithographic press, installed in 2019.</p> <p>EU 8 Press#40 MDE Reg. No. 6-1983 29-inch, 8-color lithographic printing press with aqueous coater and UV ink capability, installed in 1993.</p> <p>EU 5 Press#42 MDE Reg. No. 6-2156 8-color Heidelberg CD sheet-fed lithographic press with a coating tower, installed in 1995.</p> <p>EU10 Press#44 MDE Reg. No. 6-2377 2- color Heidelberg sheet-fed lithographic press, installed in 1998.</p>
3.1	<p><u>Applicable Standards/Limits:</u></p> <p><u>Control of VOC Emissions</u></p> <p>A. COMAR 26.11.19.11C – <u>Standards for Sheet-Fed Lithographic Printing.</u> “A person may not operate a sheet-fed letter or lithographic press with a cylinder width of 18 inches or greater unless: (1) The fountain solution is refrigerated to maintain a temperature of less than 55° F if isopropyl alcohol is used;</p>

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Table IV-3 Sheet-Fed Lithographic Presses	
	<p>(2) A temperature indicator is installed to monitor the fountain temperature if the solution is refrigerated; and</p> <p>(3) The fountain solution contains less than 8.5 percent isopropyl alcohol by weight.”</p> <p>B. COMAR 26.11.19.11F – Requirements for Cleaning Materials. “(1) A person who owns or operates a lithographic press or letterpress shall comply with this section.</p> <p>(2) A person subject to this regulation may use up to a total of 110 gallons per calendar year of cleaning solutions at a premises without regard to VOC content.</p> <p>(3) A person subject to this regulation that uses any cleaning solution at a premises excluding the 110 gallons per calendar year specified in §F(2) shall ensure that the additional cleaning solution:</p> <p>(a) Has a composite vapor pressure of less than 10 mm of mercury at 68° F (20°C); or</p> <p>(b) Contains less than 70 percent VOC by weight.”</p>
3.2	<p><u>Testing Requirements:</u></p> <p><u>Control of VOC Emissions</u></p> <p>A. The temperature sensors installed to measure the fountain solution temperature shall be checked with a calibrated thermometer at least once every six months if IPA is used. The results of the measurement and the deviation of the temperature gage from the thermometer reading shall be recorded. [Reference: COMAR 26.11.03.06C]</p> <p>B. The Permittee shall perform tests when required as part of an evaluation requested by the Department of non-VOC and low VOC cleanup materials. [Reference: COMAR 26.11. 19.11E(4)]</p>
3.3	<p><u>Monitoring Requirements:</u></p> <p><u>Control of VOC Emissions</u></p> <p>A. The fountain solution temperature of any press using isopropyl alcohol in the fountain solution shall be checked once each day the press is operating and the results recorded. [Reference: COMAR 26.11.03.06C]</p> <p>If isopropyl alcohol is used on any press, the Permittee shall have readily available for the operator of that press and environmental</p>

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Table IV-3 Sheet-Fed Lithographic Presses	
	<p>inspectors a hydrometer calibrated in percent isopropyl alcohol for the purpose of checking the alcohol content of the fountain solution. A hydrometer reading shall be taken and recorded each time after alcohol is added to the fountain solution. If the alcohol content of the fountain solution is regulated automatically, a hydrometer reading shall be taken and recorded at least once every operating shift. [Reference: COMAR 26.11.03.06C]</p> <p>B. COMAR 26.11.19.11E(3) – The Permittee shall perform an inspection once a month to verify compliance with the requirement to store waste and other materials that contain VOC in closed containers and maintain lids on VOC cleanup materials storage.</p>
3.4	<p><u>Record Keeping Requirements:</u></p> <p><u>Note:</u> All records must be maintained onsite for a period of at least 5 years and shall be made available to the Department upon request. [Reference: COMAR 26.11.03.06C(5)(g)]</p> <p><u>Control of VOC Emissions</u></p> <p>A. The Permittee shall maintain:</p> <ol style="list-style-type: none"> (1) Daily records of fountain solution temperature for fountain solutions containing isopropyl alcohol. [Reference: COMAR 26.11.03.06C] (2) Copies of the MSD Sheets or VOC data sheets that show the quantity of VOC in the inks and fountain solutions calculated using EPA Reference Method 24 or equivalent. [Reference: COMAR 26.11.03.06C] (3) Monthly records of hours of operation for each press and total material usage. [Reference: MDE PTC Nos. 03-6-2156N, 005-6-2818N, 03-6-1983N, 03-6-2634N, and 03-6-2377N] <p><u>Additional Record keeping Requirements.</u> "A person subject to this regulation shall maintain records on site including the following information:</p> <ol style="list-style-type: none"> (1) The fountain solution formulations; (2) The VOC content, in percent VOC by weight, of the fountain solutions; (3) The temperature of the press fountain solutions for lithographic printing presses using alcohol in the fountain solution; and (4) The quantity of cleaning solutions used and their vapor pressure or percentage VOC concentration by weight." [Reference: COMAR 26.11.19.11H]

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Table IV-3 Sheet-Fed Lithographic Presses	
	<p>B. The Permittee shall:</p> <ul style="list-style-type: none"> (1) Keep a written copy of the good operating practices manual; (2) Maintain a record of the results of the monthly inspections performed to verify that good operating practices are implemented; and (3) Keep records of the results of any clean-up materials study, which was requested by the Department. <p>[Reference: COMAR 26.11.19.11E(3) and COMAR 26.11.03.06C]</p>
3.5	<p><u>Reporting Requirements:</u></p> <p><u>Control of VOC Emissions</u></p> <p>A. The Permittee shall report the quantity and identity of all VOC-containing materials that are used during a year in the annual emissions certification report. [Reference: COMAR 26.11.03.06C]</p> <p>B. The Permittee shall report the results of any clean-up materials study requested by the Department. [Reference: COMAR 26.11.19.11E(4)]</p>

A permit shield shall cover the applicable requirements identified for the emission units listed in the table above.

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SECTION V INSIGNIFICANT ACTIVITIES

This section provides a list of insignificant emissions units that were reported in the Title V permit application. The applicable Clean Air Act requirements, if any, are listed below the insignificant activity.

- (1) Space heaters utilizing direct heat transfer and used solely for comfort heat;
- (2) Water cooling towers and water cooling ponds unless used for evaporative cooling of water from barometric jets or barometric condensers, or used in conjunction with an installation requiring a permit to operate;
- (3) No. 10 Unheated VOC dispensing containers or unheated VOC rising containers of 60 gallons (227 liters) capacity or less;
- (4) Containers, reservoirs, or tanks used exclusively for:
 - (a) No. 1 Storage of lubricating oils;
 - (b) No. 50 The storage of VOC normally used as solvents, diluents, thinners, inks, colorants, paints, lacquers, enamels, varnishes, liquid resins, or other surface coatings and having individual capacities of 2,000 gallons (7.6 cubic meters) or less;
- (5) Non-contact water (i.e., water that has not been in direct contact with process fluids) cooling towers except as regulated under Section 112 of the Clean Air Act;
- (6) Any other emissions unit at the facility which is not subject to an applicable requirement of the Clean Air Act :
 - No. 1 Paper cutting, collating, folding, binding, and gluing equipment associated with the printing press lines.
 - No. 1 EU4 41 gallon Solvent Wash Tank in Gravure Press Room. Emission unit EU-4 consists of a solvent wash tank located in the gravure press room. This solvent wash tank is used to clean press components from the gravure press. The solvent wash tank is equipped with a lid that remains closed when the unit is not in operation to suppress the evaporative emissions from the cleaning solvent. The solvent wash tank was installed prior to 1995.

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SECTION VI STATE-ONLY ENFORCEABLE CONDITIONS

The Permittee is subject to the following State-only enforceable requirements:

1. Applicable Regulations:
 - (A) COMAR 26.11.06.08 – Nuisance.
“An installation or premises may not be operated or maintained in such a manner that a nuisance or air pollution is created. Nothing in this regulation relating to the control of emissions may in any manner be construed as authorizing or permitting the creation of, or maintenance of, nuisance or air pollution.”
 - (B) COMAR and 26.11.06.09 – Odors.
“A person may not cause or permit the discharge into the atmosphere of gases, vapors, or odors beyond the property line in such a manner that a nuisance or air pollution is created.”
 - (C) COMAR 26.11.15.05A – Control Technology Requirement.
“A person may not construct, reconstruct, operate, or cause to be constructed, reconstructed, or operated, any new installation or source that will discharge a toxic air pollutant to the atmosphere without installing and operating T-BACT.”
 - (D) COMAR 26.11.15.06A(1) – Ambient Impact Requirement.
 - (1) “Except as provided in §A(2) of this regulation, a person may not construct, modify, or operate, or cause to be constructed, modified, or operated, any new installation or source without first demonstrating to the satisfaction of the Department using procedures established in this chapter that total allowable emissions from the premises of each toxic air pollutant discharged by the new installation or source will not unreasonably endanger human health.
 - (2) If a new installation or source will discharge a TAP that is not listed in COMAR 26.11.16.07 and will be part of an existing premises, then emissions of that TAP from existing sources or existing installations on the premises may be omitted from a screening analysis unless the TAP is added to COMAR 26.11.16.07.”

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2. Operating Conditions:

The Permittee shall comply with the requirements stated in COMAR 26.11.19.02I & COMAR 26.11.19.11E, use low solvent inks, and shall not use isopropyl alcohol in the fountain solutions in order to satisfy the T-BACT requirement of COMAR 26.11.15.05. **[PTC 005-6-2825N Issued on May 13, 2005]**

3. Record Keeping and Reporting:

The Permittee shall submit to the Department, by April 1 of each year during the term of this permit, a written certification of the results of an analysis of emissions of toxic air pollutants from the Permittee's facility during the previous calendar year. The analysis shall include either:

- (a) a statement that previously submitted compliance demonstrations for emissions of toxic air pollutants remain valid; or
- (b) a revised compliance demonstration, developed in accordance with requirements included under COMAR 26.11.15 & 16, that accounts for changes in operations, analytical methods, emissions determinations, or other factors that have invalidated previous demonstrations.

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BACKGROUND

Gamse Lithographing Company (Gamse), Inc. is a commercial lithographic, flexographic printing facility. In 1955, the firm moved to its present location on Pulaski Highway. By 1960 the building expanded by 8,000 additional square feet to house a new 6 color gravure press. The Pulaski Highway building was further expanded to its present 70,000 square feet.

The facility consists of a sheet-fed lithographic printing area, a flexographic printing area, a bindery area, and a warehouse. The company currently has in operation four (4) sheet-fed lithographic presses and four (4) flexographic web printing presses. The bindery area is used to cut, shape, and fold the various printed materials produced at the facility. The finished goods warehouse area is located at the rear of the facility. The SIC code for the facility is 2754.

During this permitting period, the Permittee added one (1) 16-inch, 10-color Mark Andy flexographic heat-set web press using waterbased and UV inks. This new printing press was permitted and installed in 2015.

Also during this period, the Permittee discontinued the following units: one (1) rotogravure press (#47) equipped with TEC catalytic oxidizer; one (1) non-heat set web press (#43); one (1) 6-color non-heat set web press (#46); one (1) 8-color non-heat set web press (#41). On June 30, 2019 Gamse Lithographing Company, Inc. completed a replacement in kind of one (1) 8-color sheet-fed press (#42) with a new similar 8-color unit (#30). The one (1) 8-color sheet-fed lithographic press (#42) was decommissioned on June 30, 2019.

The actual VOC emissions from this facility are above the major source threshold levels. The major source threshold for triggering Title V permitting requirements in Baltimore County is a potential to emit of 25 tons per year for VOC, 25 tons per year for NOx, and 100 tons per year of any other criteria pollutant. Since actual VOC emissions from the facility are greater than the major source threshold, Gamse Lithographing Company, Inc. is required to obtain a Title V-Part 70 Operating Permit under COMAR 26.11.03.01.

Table 1 summarizes the potential and actual emissions from the facility based on calculations and as reported in the Annual Emission Certification Reports.”

Table 1: Facility Actual Emissions

Potential Emissions	NO _x (TPY)	SO _x (TPY)	PM ₁₀ (TPY)	CO (TPY)	HAP (TPY)	VOC (TPY)
2019	0.00	0.00	0.00	0.00	0.30	19.9
2018	0.00	0.00	0.00	0.00	0.35	18.99
2017	0.14	0.001	0.011	0.117	1.66	27.6
2016	0.18	0.001	0.013	0.148	2.00	33.3
2015	1.13	0.001	0.00	0.106	1.94	32.4

Gamse Lithographing Company, Inc. was issued a Title V-Part 70 Operating Permit on July 25, 2001. The current Part 70 Operating Permit will expire on September 30, 2020. A permit renewal application was received on November 26, 2019. A completeness determination letter was sent to Gamse Lithographing Company, Inc. on December 5, 2019 granting the facility an application shield.

EMISSION UNIT IDENTIFICATION

Gamse Lithographing Company, Inc. has identified the following emission units as being subject to the Title V permitting requirements and having applicable requirements:

Table 2: Emission Units

Emission Unit Number	Press Number	MDE Reg. No.	Emissions Unit Name and Description	PTC Issued
FLEXOGRAPHIC PRESSES				
EU 11	69	6-3017	16-inch, 10-color Mark Andy flexographic heat-set press using water-based inks	2011
EU 12	66	6-2825	16-inch, 10-color COMCO Pro-Glide flexographic heat-set press using water-based inks	2005
EU 13	68	6-2936	13-inch, 10-color Mark Andy LP3000 flexographic printing press equipped with a UV curing system on one color unit	2008
EU 14	70	6-3123	16-inch, 10-color Mark Andy flexographic heat-set web press using water-based and UV inks	2015

SHEET-FED LITHOGRAPHIC PRESSES				
EU15	30	6-3194	8-color lithographic printing press	2019
EU 8	40	6-1983	29-inch, 8-color lithographic printing press with aqueous coater and UV ink capability	2006
EU 5	42	6-2156	8-color Heidelberg CD sheet-fed lithographic press with a coating tower	1995
EU10	44	6-2377	2- color Heidelberg sheet-fed lithographic press	1998

COMPLIANCE ASSURANCE MONITORING (CAM) APPLICABILITY

Compliance Assurance Monitoring (CAM) 40 CFR, Subpart 64 applies to any emission unit at a Title V source that meets the following criteria:

- The emission unit is subject to a federally enforceable emission limit or standard for a regulated pollutant;
- The emission unit uses a control device to achieve compliance with any such emission limitation;
- The emission unit has the potential to emit pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount, in tons per year required for a source to be classified as a major source and must not otherwise be exempt from CAM.

Gamse Lithographing Company, Inc. maintains various printing presses. However, none of the presses require the use of a control device to achieve compliance with applicable emission limits. Also, none of the presses has a potential to emit pre-controlled that are equal to or greater than 100 percent of the amount, in tons per year required for a source to be classified as a major source. Furthermore, no control devices are employed to control particulate, sulfur oxides, nitrogen oxides, or VOC. CAM requirements, therefore, are not applicable to these units.

AN OVERVIEW OF THE PART 70 PERMIT

Section I of the Part 70 Permit contains a brief description of the facility and an inventory list of the emissions units for which applicable requirements are identified in Section IV of the permit.

Section II of the Part 70 Permit contains the general requirements that relate to administrative permit actions. This section includes the procedures for renewing, amending, reopening, and transferring permits, the relationship to permits to construct and approvals, and the general duty to provide information and to comply with all applicable requirements.

Section III of the Part 70 Permit contains the general requirements for testing, record keeping and reporting; and requirements that affect the facility as a whole, such as open burning, air pollution episodes, particulate matter from construction and demolition activities, asbestos provisions, ozone depleting substance provisions, general conformity, and acid rain permit. This section includes the requirement to report excess emissions and deviations, to submit an annual emissions certification report and an annual compliance certification report, and results of sampling and testing.

Section IV of the Part 70 Permit identifies the emissions standards, emissions limitations, operational limitations, and work practices applicable to each emissions unit located at the facility. For each standard, limitation, and work practice, the permit identifies the basis upon which the Permittee will demonstrate compliance. The basis will include testing, monitoring, record keeping, and reporting requirements. The demonstration may include one or more of these methods.

Section V of the Part 70 Permit contains a list of insignificant activities. These activities emit very small quantities of regulated air pollutants and do not require a permit to construct or registration with the Department. For insignificant activities that are subject to a requirement under the Clean Air Act, the requirement is listed under the activity.

Section VI of the Part 70 Permit contains State-only enforceable requirements. Section VI identifies requirements that are not based on the Clean Air Act, but solely on Maryland air pollution regulations. These requirements generally relate to the prevention of nuisances and implementation of Maryland's Air Toxics Program.

REGULATORY AND TECHNICAL REVIEW

Emission Units: Facility Wide

The requirement to control VOC leaks from equipment as found in COMAR 26.11.19.16 applies to any person subject to a VOC emission standard in Chapter 19 and not subject to a specific leak requirement in a regulation. GAMSE is subject to the regulations in Chapter 19 that apply to printing operations.

Applicable Standards/Limits:

Control of VOC Emissions

COMAR 26.11.19.16C&D – Control of VOC Equipment Leaks

“General Requirements. A person subject to this regulation shall comply with all of the following requirements:

- (1) Visually inspect all components on the premises for leaks at least once each calendar month.

- (2) Tag any leak immediately so that the tag is clearly visible. The tag shall be made of a material that will withstand any weather or corrosive conditions to which it may be normally exposed. The tag shall bear an identification number, the date the leak was discovered, and the name of the person who discovered the leak. The tag shall remain in place until the leak has been repaired.
- (3) Take immediate action to repair all observed VOC leaks that can be repaired within 48 hours.
- (4) Repair all other leaking components not later than 15 days after the leak is discovered. If a replacement part is needed, the part shall be ordered within 3 days after discovery of the leak, and the leak shall be repaired within 48 hours after receiving the part.
- (5) Maintain a supply of components or component parts that are recognized by the source to wear or corrode, or that otherwise need to be routinely replaced, such as seals, gaskets, packing, and pipefitting.
- (6) Maintain a log that includes the name of the person conducting the inspection and the date on which leak inspections are made, the findings of the inspection, and a list of leaks by tag identification number. The log shall be made available to the Department upon request. Leak records shall be maintained for a period of not less than 2 years from the date of their occurrence."

"Exceptions. Components that cannot be repaired as required in this regulation because they are inaccessible, or that cannot be repaired during operation of the source, shall be identified in the log and included within the source's maintenance schedule for repair during the next source shutdown."

Compliance Demonstration

The Permittee shall visually inspect all components on the premises for VOC leaks at least once each calendar month following the procedures specified in COMAR 26.11.19.16. **[Reference: COMAR 26.11.19.16C(1)]**

The Permittee shall maintain a log that includes the date on which leak inspections are made, the name of the person conducting the inspection, the findings of the inspection, a list of leaks by tag identification number and identity of components that cannot be repaired as required in this regulation because they are inaccessible, or that cannot be repaired during operation of the source. **[Reference: COMAR 26.11.19.16C and COMAR 26.11.03.06C]**

Emission Units: Flexographic Presses

EU 11 Press #69 MDE Reg. No. 6-3017

16-inch, 10-color Mark Andy flexographic heat-set press using water-based inks, installed in 2011.

EU 12 Press#66 MDE Reg. No. 6-2825

16-inch, 10-color COMCO Pro-Glide flexographic heat-set press using water-based inks, installed in 2005.

EU 13 Press#68 MDE Reg. No. 6-2936

13-inch, 10-color Mark Andy LP3000 flexographic printing press equipped with a UV curing system on one color unit, installed in 2008.

EU-14 Press #70 MDE Reg. No. 6-3123

16-inch, 10-color Mark Andy flexographic heat-set web press using water-based and UV inks, installed in 2015.

These presses are subject to COMAR 26.11.19.10 requirements. The Permittee has chosen to comply with the option described in COMAR 26.11.19.10C(1) by using water-based inks that contain less than 25% VOC by volume of the volatile portion of the ink, or high solids inks that contain not less than 60 percent nonvolatiles.

Control of VOC Emissions

Applicable Standards/Limits:

COMAR 26.11.19.10C – Requirements for Sheet-Fed or Web-Fed Flexographic, Packaging Rotogravure, and Publication Rotogravure Printing.

"A person who owns or operates a printing press that uses flexographic, packaging rotogravure, or publication rotogravure methods and is a major stationary source as defined in Regulation .01B(4) of this chapter, shall:

- (1) Reduce emissions by using water-based inks that contain less than 25 percent VOC by volume of volatile portion of the ink, or high solids inks that contain not less than 60 percent nonvolatile; or
- (2) If compliance with the requirements of Sec. C(1) of this regulation cannot be achieved, reduce the VOC content of each ink, or reduce the average VOC content of inks used at each press as follows:
 - a. 60 percent reduction for flexographic presses,
 - b. 65 percent reduction for packaging rotogravure presses, and
 - c. 75 percent reduction for publication rotogravure presses."

Compliance Demonstration:

The Permittee shall:

- (1) Maintain MSD sheets or other manufacturer's certified product sheets for each material used where the VOC content specified on MSD or product sheets has been determined based on EPA Reference Method 24 or an equivalent methodology approved by the Department.
- (2) Maintain records pertaining to the low solvent or high solids characteristics of VOC materials used that are adequate to demonstrate that emissions are below the applicable threshold as stated in COMAR 26.11.19.10C(1)

[Reference: COMAR 26.11.03.06C]

The Permittee shall report the quantity and identity of all VOC- containing materials that are used during a year in the annual emissions certification report. **[Reference: COMAR 26.11.03.06C]**

Emission Units: Sheet-Fed Lithographic Presses

EU 15 Press# 30 MDE Reg. No. 6-3194

40-inch, 8-color sheet-fed lithographic press, installed in 2019.

EU 8 Press#40 MDE Reg. No. 6-1983

29-inch, 8-color lithographic printing press with aqueous coater and UV ink capability, installed in 1993.

EU 5 Press#42 MDE Reg. No. 6-2156

8-color Heidelberg CD sheet-fed lithographic press with a coating tower, installed in 1995.

EU10 Press#44 MDE Reg. No. 6-2377

2- color Heidelberg sheet-fed lithographic press, installed in 1998.

These presses are subject to COMAR 26.11.19.11C and E.

Control of VOC Emissions

A. COMAR 26.11.19.11C – Standards for Sheet-Fed Lithographic Printing.

“A person may not operate a sheet-fed letter or lithographic press with a cylinder width of 18 inches or greater unless:

- (1) The fountain solution is refrigerated to maintain a temperature of less than 55° F if isopropyl alcohol is used;
- (2) A temperature indicator is installed to monitor the fountain temperature if the solution is refrigerated; and
- (3) The fountain solution contains less than 8.5 percent isopropyl alcohol by weight.”

Compliance Demonstration:

The temperature sensors installed to measure the fountain solution temperature shall be checked with a calibrated thermometer at least once every six months if IPA is used. The results of the measurement and the deviation of the temperature gage from the thermometer reading shall be recorded. **[Reference: COMAR 26.11.03.06C]**

The fountain solution temperature of any press using isopropyl alcohol in the fountain solution shall be checked once each day the press is operating and the results recorded. **[Reference: COMAR 26.11.03.06C]**

If isopropyl alcohol is used on any press, the Permittee shall have readily available for the operator of that press and environmental inspectors a hydrometer calibrated

in percent isopropyl alcohol for the purpose of checking the alcohol content of the fountain solution. A hydrometer reading shall be taken and recorded each time after alcohol is added to the fountain solution. If the alcohol content of the fountain solution is regulated automatically, a hydrometer reading shall be taken and recorded at least once every operating shift. **[Reference: COMAR 26.11.03.06C]**

The Permittee shall maintain:

- (1) Daily records of fountain solution temperature for fountain solutions containing isopropyl alcohol. **[Reference: COMAR 26.11.03.06C]**
- (2) Copies of the MSD Sheets or VOC data sheets that show the quantity of VOC in the inks and fountain solutions calculated using EPA Reference Method 24 or equivalent. **[Reference: COMAR 26.11.03.06C]**
- (3) Monthly records of hours of operation for each press and total material usage. **[Reference: MDE PTC Nos. 03-6-2156N, 005-6-2818N, 03-6-1983N, 03-6-2634N]**

The Permittee shall report the quantity and identity of all VOC- containing materials that are used during a year in the annual emissions certification report. **[Reference: COMAR 26.11.03.06C]**

B. COMAR 26.11.19.11F – Requirements for Cleaning Materials.

- “(1) A person who owns or operates a lithographic press or letterpress shall comply with this section.
- (2) A person subject to this regulation may use up to a total of 110 gallons per calendar year of cleaning solutions at a premises without regard to VOC content.
 - (3) A person subject to this regulation that uses any cleaning solution at a premises excluding the 110 gallons per calendar year specified in §F(2) shall ensure that the additional cleaning solution:
 - (a) Has a composite vapor pressure of less than 10 mm of mercury at 68° F (20°C); or
 - (b) Contains less than 70 percent VOC by weight.”

Compliance Demonstration:

The Permittee shall perform tests when required as part of an evaluation requested by the Department of non-VOC and low VOC cleanup materials. **[Reference: COMAR 26.11.19.11E(4)]**

COMAR 26.11.19.11E(3) – The Permittee shall perform an inspection once a month to verify compliance with the requirement to store waste and other materials that contain VOC in closed containers and maintain lids on VOC cleanup materials storage.

The Permittee shall:

- (1) Keep a written copy of the good operating practices manual;
- (2) Maintain a record of the results of the monthly inspections performed to verify that good operating practices are implemented; and

- (3) Keep records of the results of any clean-up materials study, which was requested by the Department.

[Reference: COMAR 26.11.19.11E(3) and COMAR 26.11.03.06C]

The Permittee shall report the results of any clean-up materials study requested by the Department. **[Reference: COMAR 26.11.19.11E(4)]**

In addition, a person subject to this regulation shall maintain records on site including the following information:

- (1) The fountain solution formulations;
- (2) The VOC content, in percent VOC by weight, of the fountain solutions;
- (3) The temperature of the press fountain solutions for lithographic printing presses using alcohol in the fountain solution; and
- (4) The quantity of cleaning solutions used and their vapor pressure or percentage VOC concentration by weight." **[Reference: COMAR 26.11.19.11H]**

COMPLIANCE HISTORY

Gamse entered into a Consent Agreement with the Department on September 30, 2009 to correct violations of its Title V Operating permit. Additional operating conditions of the Consent Agreement have been incorporated into the Title V operating permit.

COMPLIANCE SCHEDULE

Gamse Lithographing is currently in compliance with all applicable air quality regulations.

TITLE IV - ACID RAIN

The Acid Rain Program does not apply to Gamse Lithographing.

TITLE VI - OZONE DEPLETING SUBSTANCES

The facility is currently complying with the applicable federal requirements in 40 CFR 82, 82.34(a); 82.42(a)(1); 82.42(b)(1),(2).

SECTION 112 (r) - ACCIDENTAL RELEASE

The facility is not subject to the requirements of Section 112(r) of the CAA.

PERMIT SHIELD

Gamse Lithographing requested a permit shield. The Department grants a permit shield on a unit-by-unit basis. This shield will cover the applicable Clean Air Act Requirements that the Department has listed for each unit in this permit.

SECTION V INSIGNIFICANT ACTIVITIES

This section provides a list of insignificant emissions units that were reported in the Title V permit application. The applicable Clean Air Act requirements, if any, are listed below the insignificant activity.

- (1) Space heaters utilizing direct heat transfer and used solely for comfort heat;
- (2) Water cooling towers and water cooling ponds unless used for evaporative cooling of water from barometric jets or barometric condensers, or used in conjunction with an installation requiring a permit to operate;
- (3) No. 10 Unheated VOC dispensing containers or unheated VOC rising containers of 60 gallons (227 liters) capacity or less;
- (4) Containers, reservoirs, or tanks used exclusively for:
 - (a) No. 1 Storage of lubricating oils;
 - (b) No. 50 The storage of VOC normally used as solvents, diluents, thinners, inks, colorants, paints, lacquers, enamels, varnishes, liquid resins, or other surface coatings and having individual capacities of 2,000 gallons (7.6 cubic meters) or less;
- (5) Non-contact water (i.e., water that has not been in direct contact with process fluids) cooling towers except as regulated under Section 112 of the Clean Air Act;
- (6) Any other emissions unit at the facility which is not subject to an applicable requirement of the Clean Air Act:
 - No. 1 Paper cutting, collating, folding, binding, and gluing equipment associated with the printing press lines.
 - No. 1 EU4 41 gallon Solvent Wash Tank in Gravure Press Room. Emission unit EU-4 consists of a solvent wash tank located in the gravure press room. This solvent wash tank is used to clean press components from the gravure press. The solvent wash tank is equipped with a lid that remains closed when the unit is not in operation to suppress the evaporative

emissions from the cleaning solvent. The solvent wash tank was installed prior to 1995.

SECTION VI STATE-ONLY ENFORCEABLE CONDITIONS

The Permittee is subject to the following State-only enforceable requirements:

1. Applicable Regulations:
 - (A) COMAR 26.11.06.08 and 26.11.06.09, which generally prohibit the discharge of emissions beyond the property line in such a manner that a nuisance or air pollution is created.
 - (B) COMAR 26.11.15.05, which requires that the Permittee implement "Best Available Control Technology for Toxics" (T – BACT) to control emissions of toxic air pollutants.
 - (C) COMAR 26.11.15.06, which prohibits the discharge of toxic air pollutants to the extent that such emissions will unreasonably endanger human health.
2. Operating Conditions:

The Permittee shall comply with the requirements stated in COMAR 26.11.19.02I & COMAR 26.11.19.11E, use low solvent inks, and shall not use isopropyl alcohol in the fountain solutions in order to satisfy the T-BACT requirement of COMAR 26.11.15.05. **[PTC 005-6-2825N Issued on May 13, 2005]**
3. Testing and Monitoring:
4. Record Keeping and Reporting:

The Permittee shall submit to the Department, by April 1 of each year during the term of this permit, a written certification of the results of an analysis of emissions of toxic air pollutants from the Permittee's facility during the previous calendar year. The analysis shall include either:

- (a) A statement that previously submitted compliance demonstrations for emissions of toxic air pollutants remain valid; or
- (b) A revised compliance demonstration, developed in accordance with requirements included under COMAR 26.11.15 & 16, that accounts for changes in operations, analytical methods, emissions determinations, or other factors that have invalidated previous demonstrations.