

October 3, 2008

Mr. Gerry Bonetto  
Printing Industries of California  
P.O. Box 910936  
Los Angeles, CA 90091-0936

Subject: Summary of 10/2/08 Discussion Regarding Rule 450, Graphic Arts  
Operations

Dear Mr. Bonetto,

Thank you for taking the time yesterday to discuss Rule 450, Graphic Arts Operations, with the District staff. The purpose of this letter is to summarize our discussion on the three issues you raised at our September Board hearing.

#### Definitions of Other On-Press Components and Removable Press Components

You requested that the term "On-Press Component" be defined in the rule, and that the definitions be clarified to distinguish between an "On-Press Component" and a "Removable Press Component."

We propose to address this issue by revising these definitions to clarify which components are considered on-press components and which are considered removable press components. On-press components (Section 239) will be defined as those which are cleaned while still being physically attached to the press, including blankets, rollers, metering rollers, printing plates, fountains, and impression cylinders. Removable press components (Section 247) will be defined as those that are disassembled and removed from the press prior to cleaning, and will specifically exclude blankets, rollers, metering rollers, printing plates, fountains, and impression cylinders.

In Section 302.1, we propose to revise the table to show a heading for On-Press Components, which will have three categories listed beneath it: Blanket and Roller Washes; Metering Rollers/Printing Plates; and Other On-Press Components.

The proposed changes to the rule language are attached.

#### Duration of Records

At the September 25 public hearing, you requested that the requirement to maintain records for 5 years only apply to major sources.

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The requirement to maintain records for 5 years (Section 501.5) is not a new requirement in the rule. It has been in place since the March 23, 2000 amendment of the rule. In our discussion yesterday, you indicated that you no longer have an issue with this recordkeeping requirement.

#### 15% Usage Limitation for Metering Roller/Printing Plate Cleaners

You requested that the 15% limit on the usage of metering roller/printing plate cleaners be eliminated.

The current rule limits the monthly volumetric usage of metering roller/printing plate cleaners to 15% of the monthly volumetric usage of blanket and roller washes (Section 302.2). This requirement was added in the March 23, 2000 amendment of the rule as a compromise in exchange for allowing metering roller/printing plate cleaners a higher composite VOC vapor pressure than is allowed for blanket and roller washes.

In your May 7, 2008 letter, you also requested that we eliminate the 15% limit. In responding to that request, we analyzed the emissions impact of removing the 15% usage limit, and concluded that removing the requirement immediately would lead to an increase in emissions. To avoid an increase in emissions, Staff's proposal at the September Board hearing included a provision to sunset the 15% usage limit on 1/1/2011, when the limits for metering roller/printing plate cleaners and blanket and roller washes will both be reduced to 100 g/l VOC. In addition, the proposal included an exemption (Section 110.8) from the 15% limitation for early compliance by presses using metering roller/printing plate cleaners containing no greater than 100 g/l VOC.

At the Board hearing, you stated that a printer in our District had been issued a Notice of Violation (NOV) for exceeding the 15% limit. Upon examination of this case file, we found that this NOV has been rescinded because the source was not tracking usage and calculating the percentage properly. When these recordkeeping problems were resolved, it was determined that the source had not exceeded the 15% limit.

Please note that the 15% limit applies to the volume of cleaning materials used, not to the amount of VOC contained in the materials. Therefore, reducing the amount of VOC contained in a blanket and roller wash solution will not cause a source to exceed the 15% limit. So far, we have only one source that has experienced a compliance issue, which occurred when the source reduced their volume of blanket and roller washes by using of an impregnated cloth, prepack cleaning system. That source is now operating under a variance. In order to avoid an increase in emissions from the variance from the 15% limit, the source was required to use a  $\leq 100$  g/l metering roller/printing plate cleaner. Adoption of the proposed exemption from the 15% requirement for sources using metering roller/printing plate cleaners that meet the 100 g/l limit will obviate the need for the variance.

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During yesterday's call, we discussed whether current metering roller/printing plate cleaners can comply with the current requirements for blankets and roller washes (i.e., 300 g/l VOC or 10 mm Hg vapor pressure). You indicated that you would check on the availability of such products. We request that you also suggest an appropriate compliance timeframe for implementing these limits. If these limits are feasible, then we could consider requiring metering roller/printing plate cleaners to meet these limits, and sunset the 15% requirement concurrent with the new limits taking effect.

We look forward to hearing back from you about whether metering roller/printing plate cleaners can comply with a limit of 300 g/l VOC or 10 mm Hg vapor pressure. Please contact me at (916) 874-4851 if you would like to discuss any of these issues further. Thank you.

Sincerely,

A handwritten signature in cursive script that reads "Kevin J. Williams".

Kevin J. Williams, Ph.D.  
Program Coordinator

Attachment

### Revised Proposed Rule Language

- 204 **BLANKET AND ROLLER WASHES:** Cleaning materials, which are used to remove the printing inks, oils, and paper pieces from the blankets and rollers excluding metering rollers and printing plates.
- 233 **METERING ROLLER:** A roller to transfer and meter fountain solution to maintain hydrophilic properties.
- 239 **OTHER-ON-PRESS COMPONENT:** A part, component, or accessory of a press that is cleaned while still being physically attached to the press, including ~~dampening rollers, fountains, impression cylinders, blankets, rollers, metering rollers and printing plates.~~ Blankets, rollers, metering rollers, and printing plates shall not be considered as other on-press components.
- 247 **REMOVABLE PRESS COMPONENT:** A part, component, or accessory of a press that is physically attached to the press but is disassembled and removed from the press prior to being cleaned. ~~Rollers, blankets, metering rollers, dampening rollers, printing plates, fountains, impression cylinders, blankets, rollers, metering rollers, and printing plates~~ shall not be considered as removable press components.

Material Type	Current Limits (The specified limits remain in effect until limits are replaced by limits listed in subsequent columns.)			Effective (one year after date of adoption)	Effective 1/1/2011
	VOC Content g/l (lb/gal) Including Water and Exempt Compounds		VOC Composite Partial Pressure Millimeters of Mercury at 20 °C (68 °F)	VOC Content g/l (lb/gal) Including Water and Exempt Compounds	VOC Content g/l (lb/gal) Including Water and Exempt Compounds
<b>General (e.g., maintenance, repair, solvent, wipe) Cleaning</b>	72 (0.60)			25 (0.21)	
<b>Application Equipment Cleaning</b>					
General (not specifically listed below)	100 (0.83)	AND	3	25 (0.21)	
Lithographic and Letter Press Printing					
Newsprint substrates					
<u>On-Press Components</u>					
Blanket and Roller Washes	300 (2.5)	OR	10	100 (0.83)	
Metering Rollers/Printing Plates	300 (2.5)	OR	25	100 (0.83)	
All Other On-Press Components	100 (0.83)	AND	3	100 (0.83)	
Removable Press Components	100 (0.83)	AND	3	25 (0.21)	
Substrates other than newsprint					
<u>On-Press Components</u>					
Blanket and Roller Washes	300 (2.5)	OR	10		100 (0.83)
Metering Rollers/Printing Plates	300 (2.5)	OR	25		100 (0.83)
All Other On-Press Components	100 (0.83)	AND	3		100 (0.83)
Removable Press Components	100 (0.83)	AND	3	25 (0.21)	

## **Printing Industries of California**

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October 7, 2008

Kevin J. Williams, Ph.D.  
Program Coordinator  
Sacramento Metropolitan AQMD  
777 12<sup>th</sup> Street, 3<sup>rd</sup> Floor  
Sacramento, CA 95814

Dear Mr. Williams:

I am responding to our telephone conversation yesterday regarding the three issues in proposed amended Rule 450 (Graphic Arts Operations) that I raised at the September 25, 2008, Board hearing and that you, other District staff and I discussed in conference calls on October 2 and October 6.

Let me summarize what I believe to be the agreement we have reached on the three issues.

### Recordkeeping

I testified before the hearing Board that other air districts, including the South Coast Air Quality Management District and San Joaquin Valley Air Pollution Control District, required records to be retained for three years, not five years as proposed in proposed amended Rule 450. I was wrong; both the South Coast and San Joaquin Valley have a five year record retention requirement. Accordingly, I will not oppose the five year record retention requirement in Rule 450, and will support this provision when the rule goes before the Board next month.

### Metering and Printing Plate Cleaner

I argued before the Board that the provision in the current Rule 450 and the proposed amended Rule 450 limiting the monthly usage of metering roller and printing plate cleanup to less than 15 percent (by volume) of the total monthly usage of roller and blanket wash was punitive for companies with presoaked cloth cleanup systems.

You indicated in our conversations that if a company utilized a metering roller and printing plate cleaner of no greater than 100 grams/liter (.83 lbs/gallon), the 15 percent provision would not apply.

I have inquired of the manufacturers and found that Printers Service (Prisco), MRC 85 and Allied Chemical, LV MRC 100 have solvents that meet this standard. Eight others manufacturers who responded said they didn't.

Since there seems to be at least two solvents that meet the less than 100 g/liter limit, with some trepidation, PIC will not oppose this provision in proposed amended Rule 450 when it comes before the Board in November.

Definitions of Blanket and Roller Wash, Other On-Press Components, and Removable Press Components

I have focused on these definitions in our discussions because the definitions have given rise to three different VOC content requirements for the cleanup of rollers and blankets (300 g/liter or 10mm@20°C), metering roller/printing plates (300 g/l or 25mm@20°C) and all other press components (100 g/liter and 3 mm@20°C).

Without again going into the excruciating detail of comparing the definitions of the South Coast, Bay Area, San Joaquin Valley, Yolo/Solano, I have asked that items in the first and third category be subsumed under the rubric "On-Press Components." The District is reluctant to do this and has proposed an alternative solution.

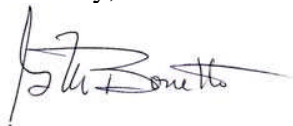
As I understand the proposal, the District has proposed a compromise solution. I have reproduced the last (page 4) from your emailed letter of October 3, 2008 and highlighted in deep red in the table the solution that I think you propose. It is as follows:

Material	VOC g/l (lbs/gal)	VOC Composite Partial Vapor Pressure
All other On-Press Components	300 (2.5)	10

If you concur with the above summary, then PIC will support the rule as amended. If I have misunderstood your proposal, please let me know as soon as possible.

Thank you in advance for the consideration you may give my letter.

Sincerely,



Gerry Bonetto, Ph.D.  
Vice President  
Government Affairs

## Revised Proposed Rule Language

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