

**AIR POLLUTION CONTROL DIVISION  
OPERATING AND MAINTENANCE PLAN**

**1. ADMINISTRATIVE**

- 1.1 Facility:        **XXXXX, Inc.**
- 1.2 Address:        XXXX XXXXX  
                         Pueblo, Colorado 81001

**2. PURPOSE**

- 2.1 This document defines the methods and procedures by which the Megtec Pollution Control Oxidizer CRPC 2000, Job # 10367 shall be properly operated and maintained by facilities management to meet the requirements of Air Permit No. XXXX.
- 2.2 This document defines the methods and procedures by which record keeping for Volatile Organic Compounds (VOC) and Hazardous Air Pollutant (HAP) emissions throughout the plant shall be maintained to meet the requirements of Air Permit No. XXXX.

**3. APPLICABLE FORMS/DOCUMENTS**

- 3.1 Forms: PM forms for the Megtec Pollution Control Oxidizer Maintenance and Operating Records.
- 3.2 Documents: Colorado Department of Public Health & Environment, Air Pollution Control Division, Air Permit No. XXXX.
- 3.3 Operation and Maintenance Manual – Megtec Catalytic Oxidizer.
- 3.4 Data sheet for calculation of Volatile Organic Compound (VOC) emissions and Hazardous Air Pollutant (HAP) emissions.

**4. MEGTEC POLLUTION CONTROL OXIDIZER CRPC 2000 OPERATING PLAN**

**4.1 Process Description**

- 4.1.1 XXXXX operates the Megtec Oxidizer to treat exhaust gases containing volatile organic gases (VOC). The Catalytic Regenerative Pollution Control System has a heat exchanger for preheating the dryer exhaust air, a catalytic section for oxidizing solvents, and a heat recovery section.

- 4.1.2 Process gases are preheated first by the primary heat exchanger and then by the burner before entering the catalyst beds. Depending on the solvent concentration, a temperature rise occurs across the catalyst from the solvent oxidation process. The hot air then passes again through the primary heat exchanger, then the secondary heat exchanger before leaving the system.

#### **4.2 Troubleshooting Response**

- 4.2.1 In the event of a problem with the oven or the oxidizer, operators shall respond according to the documented response procedures.

#### **4.3 Records Retention**

- 4.3.1 Operational and preventive maintenance (PM) records required pursuant to the Air Permit No. XXXX shall be filed on site for a minimum of three (3) years.

#### **4.4 Operating Schedule**

The Pollution Control System is designed to operate whenever the Megtec oven is in operation. If the Oxidizer is down for maintenance or repair, the oven will not run. The Oven and Oxidizer are set up so the Oven will not start without the Oxidizer operating at the proper temperature.

#### **4.5 Operating Procedures**

Operating instructions including electronic control system, operating targets, failure analysis, and technical references are provided in the Megtec manuals.

#### **4.6 Operating Parameters**

The Oxidizer operates with Interlocks to ensure it is operating at the factory set temperature of 630 degree F. If there is any malfunction with the Oxidizer, the Megtec Oven will not start, or if in operating mode, it will shut down until the problem is solved.

#### **4.7 Operating Parameter Monitoring**

- 4.7.1 Critical parameters are monitored at the control counsel of the M110 Web Press. If operating parameters fall outside of the 630 degree F specification, the system will shut down until the problem is resolved.
- 4.7.2 If parameters fail outside of the limits and the system shuts down, the operator notifies the Plant Manager or other appropriate personnel. They will go through the troubleshooting procedures and determine how to correct the problem or contact a qualified service technician.

#### 4.8 **Maintenance Plan**

- 4.8.1 The planned maintenance procedures for the Pollution Control System are provided. These procedures represent the routine maintenance schedule currently planned for the system. These procedures may be modified from time to time based on the system operating history and performance or as recommended by the manufacturer.
- 4.8.2 All maintenance done on the Pollution Control System shall be done when the system is down and the oven is not operating. There will be no bypassing of the system.
- 4.8.3 All operating and maintenance procedures shall be conducted according to the manufacturer's recommendations.
- 4.8.4 **Maintenance of the Catalyst**
  - 4.8.4.1 The catalyst will be tested for reactivity every year and changed as required to maintain the 90% control efficiency as determined by the manufacturer.
- 4.8.5 **Maintenance Record keeping**
  - 4.8.5.1 Performance of PM procedures will be conducted by the operator along with the Plant Manager (or other appropriate personnel as required). All records will be kept at the M110 Web Press.
  - 4.8.5.2 An operation log shall be maintained to track periods of system maintenance, malfunction, or shutdown.

### 5. **RECORDS AND MONITORING – AIR EMISSIONS**

#### 5.1 **General**

- 5.1.1 Compliance with the emission limits shall be demonstrated by adequate recordkeeping as described in Air Permit No. XXXX.
- 5.1.2 Record of materials (paints and solvents) associated with the Heatset Web Press (vented to the Oxidizer) shall be kept separate from the rest of the materials associated with other presses.
- 5.1.3 Material Safety Data Sheets shall be maintained according to Air Permit No. XXXX.

#### 5.2 **Emission Calculation Procedures**

- 5.2.1 VOC and HAP emissions shall be calculated on a monthly basis using the methods described in Air Permit No. XXXX.

**5.3 Records Maintained on File**

- 5.3.1 The following records related to the VOC and HAP emissions for the facility shall be maintained:
  - 5.3.1.1 Monthly VOC and HAP emissions and calculations.
  - 5.3.1.2 A 12-month summation of VOC and HAP emissions for the previous 12-month period (rolling 12-month totals).
  - 5.3.1.3 A statement of record that verifies compliance with the 30% VOC content for Lithographic inks.
    - 5.3.1.3.1 Ink vendors shall provide regulatory reports as required to verify VOC content in Lithographic inks.
    - 5.3.1.3.2 Material Safety Data Sheets (MSDS) shall be maintained on site for Division review.
  - 5.3.1.4 A record of any changes in process, VOC or HAP material usage.

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Signature of Legally Authorized Person

\_\_\_\_\_  
Date Signed

\_\_\_\_\_  
Type or Print Name and Official Title of Person Signing Above

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Telephone