



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
GREENE COUNTY**

CERTIFIED MAIL

Street Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center

Application No: 08-04542

DATE: 12/9/2003

Miami Valley Publishing Co
Darryll Heck
678 Fairfield Yellow Springs Rd
Fairborn, OH 453249762

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, Ohio 43215

Sincerely,

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA

RAPCA



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install
Terms and Conditions**

**Issue Date: 12/9/2003
Effective Date: 12/9/2003**

FINAL PERMIT TO INSTALL 08-04542

Application Number: 08-04542
APS Premise Number: 0829060354
Permit Fee: **\$200**
Name of Facility: Miami Valley Publishing Co
Person to Contact: Darryll Heck
Address: 678 Fairfield Yellow Springs Rd
Fairborn, OH 453249762

Location of proposed air contaminant source(s) [emissions unit(s)]:
678 Fairfield Yellow Springs Rd
Fairborn, Ohio

Description of proposed emissions unit(s):
web offset heatset printer.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency



Director

Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install General Terms and Conditions

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous

calendar quarters. See B.9 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit To Install fees within 30 days after the issuance of this Permit To Install.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are

required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Permit To Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

11. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

12. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

B. State Only Enforceable Permit To Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Permit Transfers

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

4. Termination of Permit To Install

This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

5. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

6. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

7. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

8. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit To Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

9. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

C. Permit To Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
 TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
organic compound	52.68

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

none

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

none

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K001 - Heatset Web Offset Printing Line (HWOPL) with regenerative thermal oxidizer (RTO)	OAC rule 3745-31-05(A)(3)	The organic compound (OC) emissions excluding cleanup from this emissions unit shall not exceed 2.31 lbs/hr and 9.43 tons/yr.
***modification		The organic compound (OC) emissions from cleanup for this emissions unit shall not exceed 4.62 tons/yr.
		The RTO shall meet a minimum destruction efficiency of 97%. (see A.I.2.b)
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G).
	OAC rule 3745-21-07(G)	see A.II.1.

2. Additional Terms and Conditions

- 2.a The 2.31 lbs OC/hour limit was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

Issued: 12/9/2003

- 2.b** The dryer-related organic compound emissions from this emissions unit shall be controlled at all times through the use of a regenerative thermal oxidizer. The thermal oxidizer shall reduce emissions of organic materials, such that 97%, or more, of the carbon in the organic material is incinerated.

(Emission units K001, K002, K004 and K006/K010 are commonly controlled with a RTO with a destruction/reduction efficiency of 97%)

II. Operational Restrictions

1. The use of any photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.
2. The average combustion temperature within the regenerative thermal oxidizer, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
3. The hand wash cleanup material is used to clean rollers and blankets and for other general purposes. The cleanup cloths shall be stored in closed containers.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the company identification of each ink, fountain solution and cleanup material employed in this emissions unit; and
 - b. documentation on whether or not each ink, fountain solution and cleanup material employed is a photochemically reactive material.
2. The permittee shall operate and maintain continuous temperature monitors and recorder(s) that measure and record(s) the combustion temperature within the regenerative thermal oxidizer when the emission is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorder(s) shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information each day:

Emissions Unit ID: K001

- a. A log of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.
 - b. All 3-hour blocks of time during which the average combustion temperature within the regenerative thermal oxidizer, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
3. The permittee shall collect and record the following information each month for the inks and fountain solutions employed in this emissions unit:
- a. The company identification for each ink and fountain solution employed.
 - b. The amount of each ink employed (in pounds).
 - c. The number of gallons of each fountain solution employed.
 - d. The organic compound content of each ink, in percent by weight.
 - e. The organic compound content of each fountain solution, in pounds per gallon.
 - f. The total potential organic compound emission rates for all inks, in pounds [i.e., the summation of (b x d) for all inks].
 - g. The total potential organic compound emission rate for all fountain solutions, in pounds [i.e., the summation of (c x e) for all fountain solutions].
 - h. The total controlled organic compound emission rate for all inks and fountain solutions, in pounds (for the calculation method, refer to section V.1.b).
4. The permittee shall collect and record the following information each month for the cleanup material employed in this emissions unit:
- a. The company identification for each cleanup material employed.
 - b. The number of gallons of each cleanup material employed.
 - c. The organic compound content of each cleanup material employed, in pounds per gallon.
 - d. The total potential organic compound emission rate for all cleanup materials, in pounds [i.e., the summation of (b x c) for all cleanup materials].
 - e. The total controlled organic compound emission rate for all cleanup materials, in pounds (for the calculation method, refer to section V.1.c).

IV. Reporting Requirements

1. The permittee shall submit deviation reports that identify the days during which photochemically reactive materials were employed in this emissions unit. Each report shall identify the cause for the use of the photochemically reactive material(s), and the estimated total quantity of material(s) emitted during each such day, in pounds. Each report shall be submitted to the Director (appropriate DO or LAA) within 30 days of the deviation.
2. In accordance with paragraph A.1.c. of the General Terms and Conditions of this permit, the permittee shall submit quarterly deviation (excursion) reports that include an identification of all 3-hour blocks of time (when the emissions unit was in operation) during which the average combustion temperature within the regenerative thermal oxidizer did not comply with the temperature limitation above.
3. The permittee also shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.

V. Testing Requirements

1. Compliance Method:

Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation-
2.31 lbs/hr OC, excluding cleanup

Applicable Compliance Method-

Compliance with the hourly limitation shall be determined as follows:

- i. The total potential organic compound emission rate from the ink, based upon the maximum hourly ink usage and respective maximum OC content, shall be multiplied by a factor of 0.80*. The product shall then be multiplied by a factor of 1 minus the destruction efficiency from the most recent performance test that demonstrated the emissions unit was in compliance.
- ii. The total potential organic compound emission rate from the fountain solution, based upon the maximum hourly fountain solution usage and respective maximum OC content, shall be multiplied by a factor of 0.70*. The product shall then be

Emissions Unit ID: K001

multiplied by a factor of 1 minus the destruction efficiency from the most recent performance test that demonstrated the emissions unit was in compliance.

- iii. The total potential fugitive organic compound emission rate from the fountain solution, based upon the maximum hourly fountain solution usage and respective maximum OC content, shall be multiplied by a factor of 0.30* (to account for a 30% fugitive emission release).
- iv. The maximum hourly organic compound emission rate, in pounds, shall then be the sum of i, ii, and iii.

- b. Emission Limitation-
9.43 tons/yr OC, excluding cleanup

Applicable Compliance Method-

Compliance with the limitation above shall be determined based on the record keeping requirements specified in Section A.III. and the following calculation methodology:

- i. The total potential organic compound emission rate from the inks (in pounds), as required to be recorded in section A.III.3.f., shall be multiplied by a factor of 0.80*. The product shall then be multiplied by a factor of 1 minus the destruction efficiency from the most recent performance test that demonstrated the emissions unit was in compliance.
- ii. The total potential organic compound emission rate from the fountain solutions (in pounds), as required to be recorded in section A.III.3.g., shall be multiplied by a factor of 0.70*. The product shall then be multiplied by a factor of 1 minus the destruction efficiency from the most recent performance test that demonstrated the emissions unit was in compliance.
- iii. The total organic compound usage rate from the fountain solutions, as required to be recorded in Section A.III.3.g., shall be multiplied by a factor of 0.30*.
- iv. The total monthly organic compound emission rate, excluding cleanup (in tons) shall be the sum of the products from i, ii, and iii, divided by 2000 lbs/ton.
- v. The annual organic compound emission rate, excluding cleanup (in tons) shall then be the sum of the 12 monthly organic compound emission rates, from 1.b.iv above, for the calendar year.

* Per DAPC guidance, the following assumptions will be used in calculating the OC emissions for this emissions unit: 20 percent of the ink solvent is retained in the web and the remaining 80 percent is vented to the regenerative thermal incinerator. 30 percent of the fountain solution emissions is fugitive, and 70 percent is vented to the regenerative thermal oxidizer. Until additional emission tests are conducted, the destruction efficiency of 97% shall be used in this calculation.

- c. Emission Limitations-
4.62 tons/yr OC, from cleanup

Applicable Compliance Method-

Compliance with the limitation above shall be determined based on the record keeping requirements specified in Section A.III.4. and the following calculation methodology:

- i. The total monthly organic compound usage rate from cleanup (in pounds), as required to be recorded in section A.III.4.d., shall be multiplied by a factor of 0.50** (50% fugitive emission release), and then divided by 2000 lbs/ton.
- ii. The annual organic compound emission rate (for cleanup, in tons) shall then be the sum of the 12 monthly organic compound emission rates, from 1.c.i. above, for the calendar year.

** Per DAPC guidance, the cleanup operations can assume 50% of the solvent is retained in the cloths and 50% is emitted as fugitive, if the solvent has a vapor pressure of 10 mmHg or lower at 20 degrees Celsius (68 deg F). If the cleanup solvent does not have a vapor pressure of 10 mmHg or lower at 20 degrees Celsius (68 deg F), then 100% of the solvent shall be counted toward fugitive emissions.

2. USEPA Method 24A shall be used to determine the VOC contents for the inks, fountain solutions and cleanup materials. If, pursuant to section 4.3 of method 24A, 40 CFR Part 60, Appendix A, the permittee determines that Method 24A cannot be used for a particular ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24A.
3. Within 12 months after permit issuance, the permittee shall conduct, or have conducted, an emission test(s) for this emissions unit in order to demonstrate compliance with the destruction efficiency for organic compounds and the allowable mass emission rate for OC. The organic compounds test(s) shall be conducted in accordance with the test methods and procedures specified in Methods 25 or 25A of 40 CFR, Part 60, Appendix A. The destruction efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases. The tests shall be conducted while the emissions unit is operating at or near maximum capacity.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the field office's refusal to accept the

results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information regarding the emissions unit operating parameters.

A comprehensive written report on the results of the emissions test(s) shall be submitted within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

VI. Miscellaneous Requirements

- ***1. a. The terms and conditions of this PTI will supercede the terms and conditions in PTI 08-2788 issued 12/01/93 to replace the catalytic incinerator control requirement and the associated monitoring, record keeping, reporting and testing requirements with the regenerative thermal oxidizer control requirement and the associated monitoring, record keeping, reporting and testing requirements.
- b. This modification also accounts for a revision of the emissions calculation based on the DAPC guidance dated 11/21/96. This results in a 10.3 tons OC/yr decrease in the allowable mass emissions.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K001 - Heatset Web Offset Printing Line (HWOPL) with regenerative thermal operator	none	none

2. Additional Terms and Conditions

- 2.a none

II. Operational Restrictions

none

III. Monitoring and/or Recordkeeping Requirements

none

IV. Reporting Requirements

none

V. Testing Requirements

none

VI. Miscellaneous Requirements

none

Issued: 12/9/2003

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K002 - Heatset Web Offset Printing Line (HWOPL) with regenerative thermal oxidizer (RTO)	OAC rule 3745-31-05(A)(3)	The organic compound (OC) emissions excluding cleanup from this emissions unit shall not exceed 3.34 lbs/hr and 12.11 tons/yr.
***modification		The organic compound (OC) emissions from cleanup for this emissions unit shall not exceed 6.27 tons/yr.
		The RTO shall meet a minimum destruction efficiency of 97%. (see A.I.2.b)
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G).
	OAC rule 3745-21-07(G)	see A.II.1.

2. Additional Terms and Conditions

- 2.a The 3.34 lbs OC/hour limit was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

- 2.b** The dryer-related organic compound emissions from this emissions unit shall be controlled at all times through the use of a regenerative thermal oxidizer. The thermal oxidizer shall reduce emissions of organic materials, such that 97%, or more, of the carbon in the organic material is incinerated.

(Emission units K001, K002, K004 and K006/K010 are commonly controlled with a RTO with a destruction/reduction efficiency of 97%)

II. Operational Restrictions

1. The use of any photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.
2. The average combustion temperature within the regenerative thermal oxidizer, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
3. The hand wash cleanup material is used to clean rollers and blankets and for other general purposes. The cleanup cloths shall be stored in closed containers.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the company identification of each ink, fountain solution and cleanup material employed in this emissions unit; and
 - b. documentation on whether or not each ink, fountain solution and cleanup material employed is a photochemically reactive material.
2. The permittee shall operate and maintain continuous temperature monitors and recorder(s) that measure and record(s) the combustion temperature within the regenerative thermal oxidizer when the emission is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorder(s) shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information each day:

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- a. A log of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.
 - b. All 3-hour blocks of time during which the average combustion temperature within the regenerative thermal oxidizer, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
3. The permittee shall collect and record the following information each month for the inks and fountain solutions employed in this emissions unit:
- a. The company identification for each ink and fountain solution employed.
 - b. The amount of each ink employed (in pounds).
 - c. The number of gallons of each fountain solution employed.
 - d. The organic compound content of each ink, in percent by weight.
 - e. The organic compound content of each fountain solution, in pounds per gallon.
 - f. The total potential organic compound emission rates for all inks, in pounds [i.e., the summation of (b x d) for all inks].
 - g. The total potential organic compound emission rate for all fountain solutions, in pounds [i.e., the summation of (c x e) for all fountain solutions].
 - h. The total controlled organic compound emission rate for all inks and fountain solutions, in pounds (for the calculation method, refer to section V.1.b).
4. The permittee shall collect and record the following information each month for the cleanup material employed in this emissions unit:
- a. The company identification for each cleanup material employed.
 - b. The number of gallons of each cleanup material employed.
 - c. The organic compound content of each cleanup material employed, in pounds per gallon.
 - d. The total potential organic compound emission rate for all cleanup materials, in pounds [i.e., the summation of (b x c) for all cleanup materials].
 - e. The total controlled organic compound emission rate for all cleanup materials, in pounds (for the calculation method, refer to section V.1.c).

IV. Reporting Requirements

1. The permittee shall submit deviation reports that identify the days during which photochemically reactive materials were employed in this emissions unit. Each report shall identify the cause for the use of the photochemically reactive material(s), and the estimated total quantity of material(s) emitted during each such day, in pounds. Each report shall be submitted to the Director (appropriate DO or LAA) within 30 days of the deviation.
2. In accordance with paragraph A.1.c. of the General Terms and Conditions of this permit, the permittee shall submit quarterly deviation (excursion) reports that include an identification of all 3-hour blocks of time (when the emissions unit was in operation) during which the average combustion temperature within the regenerative thermal oxidizer did not comply with the temperature limitation above.
3. The permittee also shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.

V. Testing Requirements

1. Compliance Method:

Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation-
3.34 lbs/hr OC, excluding cleanup

Applicable Compliance Method-

Compliance with the hourly limitation shall be determined as follows:

- i. The total potential organic compound emission rate from the ink, based upon the maximum hourly ink usage and respective maximum OC content, shall be multiplied by a factor of 0.80*. The product shall then be multiplied by a factor of 1 minus the destruction efficiency from the most recent performance test that demonstrated the emissions unit was in compliance.
- ii. The total potential organic compound emission rate from the fountain solution, based upon the maximum hourly fountain solution usage and respective maximum OC content, shall be multiplied by a factor of 0.70*. The product shall then be multiplied by a factor of 1 minus the destruction efficiency from the most recent

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performance test that demonstrated the emissions unit was in compliance.

- iii. The total potential fugitive organic compound emission rate from the fountain solution, based upon the maximum hourly fountain solution usage and respective maximum OC content, shall be multiplied by a factor of 0.30* (to account for a 30% fugitive emission release).
 - iv. The maximum hourly organic compound emission rate, in pounds, shall then be the sum of i, ii, and iii.
- b. Emission Limitation-
 12.11 tons/yr OC, excluding cleanup

Applicable Compliance Method-

Compliance with the limitation above shall be determined based on the record keeping requirements specified in Section A.III. and the following calculation methodology:

- i. The total potential organic compound emission rate from the inks (in pounds), as required to be recorded in section A.III.3.f., shall be multiplied by a factor of 0.80*. The product shall then be multiplied by a factor of 1 minus the destruction efficiency from the most recent performance test that demonstrated the emissions unit was in compliance.
- ii. The total potential organic compound emission rate from the fountain solutions (in pounds), as required to be recorded in section A.III.3.g., shall be multiplied by a factor of 0.70*. The product shall then be multiplied by a factor of 1 minus the destruction efficiency from the most recent performance test that demonstrated the emissions unit was in compliance.
- iii. The total organic compound usage rate from the fountain solutions, as required to be recorded in Section A.III.3.g., shall be multiplied by a factor of 0.30*.
- iv. The total monthly organic compound emission rate, excluding cleanup (in tons) shall be the sum of the products from i, ii, and iii, divided by 2000 lbs/ton.
- v. The annual organic compound emission rate, excluding cleanup (in tons) shall then be the sum of the 12 monthly organic compound emission rates, from 1.b.iv above, for the calendar year.

* Per DAPC guidance, the following assumptions will be used in calculating the OC emissions for this emissions unit: 20 percent of the ink solvent is retained in the web and the remaining 80 percent is vented to the regenerative thermal incinerator. 30 percent of the fountain solution emissions is fugitive, and 70 percent is vented to the regenerative thermal oxidizer. Until additional emission tests are conducted, the destruction efficiency of 97% shall be used in this calculation.

- c. Emission Limitations-
6.27 tons/yr OC, from cleanup

Applicable Compliance Method-

Compliance with the limitation above shall be determined based on the record keeping requirements specified in Section A.III.4. and the following calculation methodology:

- i. The total monthly organic compound usage rate from cleanup (in pounds), as required to be recorded in section A.III.4.d., shall be multiplied by a factor of 0.50** (50% fugitive emission release), and then divided by 2000 lbs/ton.
- ii. The annual organic compound emission rate (for cleanup, in tons) shall then be the sum of the 12 monthly organic compound emission rates, from 1.c.i. above, for the calendar year.

** Per DAPC guidance, the cleanup operations can assume 50% of the solvent is retained in the cloths and 50% is emitted as fugitive, if the solvent has a vapor pressure of 10 mmHg or lower at 20 degrees Celsius (68 deg F). If the cleanup solvent does not have a vapor pressure of 10 mmHg or lower at 20 degrees Celsius (68 deg F), then 100% of the solvent shall be counted toward fugitive emissions.

2. USEPA Method 24A shall be used to determine the VOC contents for the inks, fountain solutions and cleanup materials. If, pursuant to section 4.3 of method 24A, 40 CFR Part 60, Appendix A, the permittee determines that Method 24A cannot be used for a particular ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24A.
3. Within 12 months after permit issuance, the permittee shall conduct, or have conducted, an emission test(s) for this emissions unit in order to demonstrate compliance with the destruction efficiency for organic compounds and the allowable mass emission rate for OC. The organic compounds test(s) shall be conducted in accordance with the test methods and procedures specified in Methods 25 or 25A of 40 CFR, Part 60, Appendix A. The destruction efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases. The tests shall be conducted while the emissions unit is operating at or near maximum capacity.

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Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the field office's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information regarding the emissions unit operating parameters.

A comprehensive written report on the results of the emissions test(s) shall be submitted within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

VI. Miscellaneous Requirements

- ***1. The terms and conditions of this PTI will supercede the terms and conditions in PTI 08-3582 issued 07/29/98 to replace the catalytic incinerator control requirement and the associated monitoring, record keeping, reporting and testing requirements with the regenerative thermal oxidizer control requirement and the associated monitoring, record keeping, reporting and testing requirements.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K002 - Heatset Web Offset Printing Line (HWOPL) with regenerative thermal oxidizer	none	none

2. Additional Terms and Conditions

- 2.a none

II. Operational Restrictions

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none

III. Monitoring and/or Recordkeeping Requirements

none

IV. Reporting Requirements

none

V. Testing Requirements

none

VI. Miscellaneous Requirements

none

Issued: 12/9/2003

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K004 - Heatset Web Offset Printing Line (HWOPL) with regenerative thermal oxidizer (RTO)	OAC rule 3745-31-05(A)(3)	The organic compound (OC) emissions excluding cleanup from this emissions unit shall not exceed 1.22 lbs/hr and 3.37 tons/yr.
***modification		The organic compound (OC) emissions from cleanup for this emissions unit shall not exceed 2.64 tons/yr.
		The RTO shall meet a minimum destruction efficiency of 97%. (see A.I.2.b)
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G).
	OAC rule 3745-21-07(G)	see A.II.1.

2. Additional Terms and Conditions

- 2.a The 1.22 lbs OC/hour limit was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

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- 2.b** The dryer-related organic compound emissions from this emissions unit shall be controlled at all times through the use of a regenerative thermal oxidizer. The thermal oxidizer shall reduce emissions of organic materials such that 97%, or more, of the carbon in the organic material is incinerated.

(Emission units K001, K002, K004 and K006/K010 are commonly controlled with a RTO with a destruction/reduction efficiency of 97%)

II. Operational Restrictions

1. The use of any photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.
2. The average combustion temperature within the regenerative thermal oxidizer, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
3. The hand wash cleanup material is used to clean rollers and blankets and for other general purposes. The cleanup cloths shall be stored in closed containers.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the company identification of each ink, fountain solution and cleanup material employed in this emissions unit; and
 - b. documentation on whether or not each ink, fountain solution and cleanup material employed is a photochemically reactive material.
2. The permittee shall operate and maintain continuous temperature monitors and recorder(s) that measure and record(s) the combustion temperature within the regenerative thermal oxidizer when the emission is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorder(s) shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information each day:

- a. A log of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.
- b. All 3-hour blocks of time during which the average combustion temperature within the regenerative thermal oxidizer, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test

that demonstrated the emissions unit was in compliance.

3. The permittee shall collect and record the following information each month for the inks and fountain solutions employed in this emissions unit:
 - a. The company identification for each ink and fountain solution employed.
 - b. The amount of each ink employed (in pounds).
 - c. The number of gallons of each fountain solution employed.
 - d. The organic compound content of each ink, in percent by weight.
 - e. The organic compound content of each fountain solution, in pounds per gallon.
 - f. The total potential organic compound emission rates for all inks, in pounds [i.e., the summation of (b x d) for all inks].
 - g. The total potential organic compound emission rate for all fountain solutions, in pounds [i.e., the summation of (c x e) for all fountain solutions].
 - h. The total controlled organic compound emission rate for all inks and fountain solutions, in pounds (for the calculation method, refer to section V.1.b).
4. The permittee shall collect and record the following information each month for the cleanup material employed in this emissions unit:
 - a. The company identification for each cleanup material employed.
 - b. The number of gallons of each cleanup material employed.
 - c. The organic compound content of each cleanup material employed, in pounds per gallon.
 - d. The total potential organic compound emission rate for all cleanup materials, in pounds [i.e., the summation of (b x c) for all cleanup materials].
 - e. The total controlled organic compound emission rate for all cleanup materials, in pounds (for the calculation method, refer to section V.1.c).

IV. Reporting Requirements

1. The permittee shall submit deviation reports that identify the days during which photochemically reactive materials were employed in this emissions unit. Each report shall identify the cause for the use of the photochemically reactive material(s), and the estimated total quantity of material(s) emitted during each such day, in pounds. Each report shall be submitted to the Director (appropriate DO or LAA) within 30 days of the deviation.
2. In accordance with paragraph A.1.c. of the General Terms and Conditions of this permit, the permittee shall submit quarterly deviation (excursion) reports that include an identification of all 3-hour blocks of time (when the emissions unit was in operation) during which the average combustion temperature within the regenerative thermal oxidizer did not comply with the temperature limitation above.
3. The permittee also shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.

V. Testing Requirements

1. Compliance Method:

Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation-
1.22 lbs/hr OC, excluding cleanup

Applicable Compliance Method-

Compliance with the hourly limitation shall be determined as follows:

- i. The total potential organic compound emission rate from the ink, based upon the maximum hourly ink usage and respective maximum OC content, shall be multiplied by a factor of 0.80*. The product shall then be multiplied by a factor of 1 minus the destruction efficiency from the most recent performance test that demonstrated the emissions unit was in compliance.
- ii. The total potential organic compound emission rate from the fountain solution, based upon the maximum hourly fountain solution usage and respective maximum OC content, shall be multiplied by a factor of 0.70*. The product shall then be multiplied by a factor of 1 minus the destruction efficiency from the most recent performance test that demonstrated the emissions unit was in compliance.
- iii. The total potential fugitive organic compound emission rate from the fountain solution, based upon the maximum hourly fountain solution usage and respective maximum OC content, shall be multiplied by a factor of 0.30* (to account for a 30% fugitive emission release).

- iv. The maximum hourly organic compound emission rate, in pounds, shall then be the sum of i, ii, and iii.
- b. Emission Limitation-
3.37 tons/yr OC, excluding cleanup

Applicable Compliance Method-

Compliance with the limitation above shall be determined based on the record keeping requirements specified in Section A.III. and the following calculation methodology:

- i. The total potential organic compound emission rate from the inks (in pounds), as required to be recorded in section A.III.3.f., shall be multiplied by a factor of 0.80*. The product shall then be multiplied by a factor of 1 minus the destruction efficiency from the most recent performance test that demonstrated the emissions unit was in compliance.
- ii. The total potential organic compound emission rate from the fountain solutions (in pounds), as required to be recorded in section A.III.3.g., shall be multiplied by a factor of 0.70*. The product shall then be multiplied by a factor of 1 minus the destruction efficiency from the most recent performance test that demonstrated the emissions unit was in compliance.
- iii. The total organic compound usage rate from the fountain solutions, as required to be recorded in Section A.III.3.g., shall be multiplied by a factor of 0.30*.
- iv. The total monthly organic compound emission rate, excluding cleanup (in tons) shall be the sum of the products from i, ii, and iii, divided by 2000 lbs/ton.
- v. The annual organic compound emission rate, excluding cleanup (in tons) shall then be the sum of the 12 monthly organic compound emission rates, from 1.b.iv above, for the calendar year.

* Per DAPC guidance, the following assumptions will be used in calculating the OC emissions for this emissions unit: 20 percent of the ink solvent is retained in the web and the remaining 80 percent is vented to the regenerative thermal incinerator. 30 percent of the fountain solution emissions is fugitive, and 70 percent is vented to the regenerative thermal oxidizer. Until additional emission tests are conducted, the destruction efficiency of 97% shall be used in this calculation.

- c. Emission Limitations-
2.64 tons/yr OC, from cleanup

Applicable Compliance Method-

Compliance with the limitation above shall be determined based on the record keeping requirements specified in Section A.III.4. and the following calculation methodology:

- i. The total monthly organic compound usage rate from cleanup (in pounds), as required to be recorded in section A.III.4.d., shall be multiplied by a factor of 0.50** (50% fugitive emission release), and then divided by 2000 lbs/ton.
- ii. The annual organic compound emission rate (for cleanup, in tons) shall then be the sum of the 12 monthly organic compound emission rates, from 1.c.i. above, for the calendar year.

- ** Per DAPC guidance, the cleanup operations can assume 50% of the solvent is retained in the cloths and 50% is emitted as fugitive, if the solvent has a vapor pressure of 10 mmHg or lower at 20 degrees Celsius (68 deg F). If the cleanup solvent does not have a vapor pressure of 10 mmHg or lower at 20 degrees Celsius (68 deg F), then 100% of the solvent shall be counted toward fugitive emissions.
2. USEPA Method 24A shall be used to determine the VOC contents for the inks, fountain solutions and cleanup materials. If, pursuant to section 4.3 of method 24A, 40 CFR Part 60, Appendix A, the permittee determines that Method 24A cannot be used for a particular ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24A.
 3. Within 12 months after permit issuance, the permittee shall conduct, or have conducted, an emission test(s) for this emissions unit in order to demonstrate compliance with the destruction efficiency for organic compounds and the allowable mass emission rate for OC. The organic compounds test(s) shall be conducted in accordance with the test methods and procedures specified in Methods 25 or 25A of 40 CFR, Part 60, Appendix A. The destruction efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases. The tests shall be conducted while the emissions unit is operating at or near maximum capacity.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the field office's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information regarding the emissions unit operating parameters.

A comprehensive written report on the results of the emissions test(s) shall be submitted within 30

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days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

VI. Miscellaneous Requirements

- ***1. a. The terms and conditions of this PTI will supercede the terms and conditions in PTI 08-2674 issued 06/30/93 to replace the catalytic incinerator control requirement and the associated monitoring, record keeping, reporting and testing requirements with the regenerative thermal oxidizer control requirement and the associated monitoring, record keeping, reporting and testing requirements.
- b. This modification also accounts for a revision of the emissions calculation based on the DAPC guidance dated 11/21/96. This results in a 11.68 tons OC/yr decrease in the allowable mass emissions.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K004 - Heatset Web Offset Printing Line (HWOPL) with regenerative thermal oxidizer (RTO)	none	none

2. Additional Terms and Conditions

- 2.a none

II. Operational Restrictions

none

III. Monitoring and/or Recordkeeping Requirements

none

IV. Reporting Requirements

none

V. Testing Requirements

none

VI. Miscellaneous Requirements

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none

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K006 - Heatset Web Offset Printing Line (HWOPL) with regenerative thermal oxidizer (RTO)	OAC rule 3745-31-05(A)(3)	The organic compound (OC) emissions excluding cleanup from this emissions unit shall not exceed 0.78 lb/hr and 2.99 tons/yr.
***modification		The organic compound (OC) emissions from cleanup for this emissions unit shall not exceed 1.98 tons/yr.
		The RTO shall meet a minimum destruction efficiency of 97%. (see A.I.2.b)
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G).
	OAC rule 3745-21-07(G)	see A.II.1.

2. Additional Terms and Conditions

- 2.a The 0.78 lb OC/hour limit was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

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- 2.b** The dryer-related organic compound emissions from this emissions unit shall be controlled at all times through the use of a regenerative thermal oxidizer. The thermal oxidizer shall reduce emissions of organic materials, such that 97%, or more, of the carbon in the organic material is incinerated.

(Emission units K001, K002, K004 and K006/K010 are commonly controlled with a RTO with a destruction/reduction efficiency of 97%)

II. Operational Restrictions

1. The use of any photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.
2. The average combustion temperature within the regenerative thermal oxidizer, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
3. The hand wash cleanup material is used to clean rollers and blankets and for other general purposes. The cleanup cloths shall be stored in closed containers.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the company identification of each ink, fountain solution and cleanup material employed in this emissions unit; and
 - b. documentation on whether or not each ink, fountain solution and cleanup material employed is a photochemically reactive material.
2. The permittee shall operate and maintain continuous temperature monitors and recorder(s) that measure and record(s) the combustion temperature within the regenerative thermal oxidizer when the emission is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorder(s) shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information each day:

- a. A log of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.
- b. All 3-hour blocks of time during which the average combustion temperature within the regenerative thermal oxidizer, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test

that demonstrated the emissions unit was in compliance.

3. The permittee shall collect and record the following information each month for the inks and fountain solutions employed in this emissions unit:
 - a. The company identification for each ink and fountain solution employed.
 - b. The amount of each ink employed (in pounds).
 - c. The number of gallons of each fountain solution employed.
 - d. The organic compound content of each ink, in percent by weight.
 - e. The organic compound content of each fountain solution, in pounds per gallon.
 - f. The total potential organic compound emission rates for all inks, in pounds [i.e., the summation of (b x d) for all inks].
 - g. The total potential organic compound emission rate for all fountain solutions, in pounds [i.e., the summation of (c x e) for all fountain solutions].
 - h. The total controlled organic compound emission rate for all inks and fountain solutions, in pounds (for the calculation method, refer to section V.1.b).

4. The permittee shall collect and record the following information each month for the cleanup material employed in this emissions unit:
 - a. The company identification for each cleanup material employed.
 - b. The number of gallons of each cleanup material employed.
 - c. The organic compound content of each cleanup material employed, in pounds per gallon.
 - d. The total potential organic compound emission rate for all cleanup materials, in pounds [i.e., the summation of (b x c) for all cleanup materials].
 - e. The total controlled organic compound emission rate for all cleanup materials, in pounds (for the calculation method, refer to section V.1.c).

IV. Reporting Requirements

1. The permittee shall submit deviation reports that identify the days during which photochemically reactive materials were employed in this emissions unit. Each report shall identify the cause for the use of the photochemically reactive material(s), and the estimated total quantity of material(s) emitted during each such day, in pounds. Each report shall be submitted to the Director (appropriate DO or LAA) within 30 days of the deviation.
2. In accordance with paragraph A.1.c. of the General Terms and Conditions of this permit, the permittee shall submit quarterly deviation (excursion) reports that include an identification of all 3-hour blocks of time (when the emissions unit was in operation) during which the average combustion temperature within the regenerative thermal oxidizer did not comply with the temperature limitation above.
3. The permittee also shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.

V. Testing Requirements

1. Compliance Method:

Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation-
0.78 lb/hr OC, excluding cleanup

Applicable Compliance Method-

Compliance with the hourly limitation shall be determined as follows:

- i. The total potential organic compound emission rate from the ink, based upon the maximum hourly ink usage and respective maximum OC content, shall be multiplied by a factor of 0.80*. The product shall then be multiplied by a factor of 1 minus the destruction efficiency from the most recent performance test that demonstrated the emissions unit was in compliance.
- ii. The total potential organic compound emission rate from the fountain solution, based upon the maximum hourly fountain solution usage and respective maximum OC content, shall be multiplied by a factor of 0.70*. The product shall then be multiplied by a factor of 1 minus the destruction efficiency from the most recent performance test that demonstrated the emissions unit was in compliance.
- iii. The total potential fugitive organic compound emission rate from the fountain solution, based upon the maximum hourly fountain solution usage and respective maximum OC content, shall be multiplied by a factor of 0.30* (to account for a 30% fugitive emission release).

- iv. The maximum hourly organic compound emission rate, in pounds, shall then be the sum of i, ii, and iii.
- b. Emission Limitation-
2.99 tons/yr OC, excluding cleanup

Applicable Compliance Method-

Compliance with the limitation above shall be determined based on the record keeping requirements specified in Section A.III. and the following calculation methodology:

- i. The total potential organic compound emission rate from the inks (in pounds), as required to be recorded in section A.III.3.f., shall be multiplied by a factor of 0.80*. The product shall then be multiplied by a factor of 1 minus the destruction efficiency from the most recent performance test that demonstrated the emissions unit was in compliance.
- ii. The total potential organic compound emission rate from the fountain solutions (in pounds), as required to be recorded in section A.III.3.g., shall be multiplied by a factor of 0.70*. The product shall then be multiplied by a factor of 1 minus the destruction efficiency from the most recent performance test that demonstrated the emissions unit was in compliance.
- iii. The total organic compound usage rate from the fountain solutions, as required to be recorded in Section A.III.3.g., shall be multiplied by a factor of 0.30*.
- iv. The total monthly organic compound emission rate, excluding cleanup (in tons) shall be the sum of the products from i, ii, and iii, divided by 2000 lbs/ton.
- v. The annual organic compound emission rate, excluding cleanup (in tons) shall then be the sum of the 12 monthly organic compound emission rates, from 1.b.iv above, for the calendar year.

* Per DAPC guidance, the following assumptions will be used in calculating the OC emissions for this emissions unit: 20 percent of the ink solvent is retained in the web and the remaining 80 percent is vented to the regenerative thermal incinerator. 30 percent of the fountain solution emissions is fugitive, and 70 percent is vented to the regenerative thermal oxidizer. Until additional emission tests are conducted, the destruction efficiency of 97% shall be used in this calculation.

- c. Emission Limitations-
1.98 tons/yr OC, from cleanup

Applicable Compliance Method-

Compliance with the limitation above shall be determined based on the record keeping requirements specified in Section A.III.4. and the following calculation methodology:

- i. The total monthly organic compound usage rate from cleanup (in pounds), as required to be recorded in section A.III.4.d., shall be multiplied by a factor of 0.50** (50% fugitive emission release), and then divided by 2000 lbs/ton.
- ii. The annual organic compound emission rate (for cleanup, in tons) shall then be the sum of the 12 monthly organic compound emission rates, from 1.c.i. above, for the calendar year.

- ** Per DAPC guidance, the cleanup operations can assume 50% of the solvent is retained in the cloths and 50% is emitted as fugitive, if the solvent has a vapor pressure of 10 mmHg or lower at 20 degrees Celsius (68 deg F). If the cleanup solvent does not have a vapor pressure of 10 mmHg or lower at 20 degrees Celsius (68 deg F), then 100% of the solvent shall be counted toward fugitive emissions.
2. USEPA Method 24A shall be used to determine the VOC contents for the inks, fountain solutions and cleanup materials. If, pursuant to section 4.3 of method 24A, 40 CFR Part 60, Appendix A, the permittee determines that Method 24A cannot be used for a particular ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24A.
 3. Within 12 months after permit issuance, the permittee shall conduct, or have conducted, an emission test(s) for this emissions unit in order to demonstrate compliance with the destruction efficiency for organic compounds and the allowable mass emission rate for OC. The organic compounds test(s) shall be conducted in accordance with the test methods and procedures specified in Methods 25 or 25A of 40 CFR, Part 60, Appendix A. The destruction efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases. The tests shall be conducted while the emissions unit is operating at or near maximum capacity.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the field office's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information regarding the emissions unit operating parameters.

A comprehensive written report on the results of the emissions test(s) shall be submitted within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

VI. Miscellaneous Requirements

- ***1. a. The terms and conditions of this PTI will supercede the terms and conditions in PTI 08-2354 issued 11/29/92 to replace the catalytic incinerator control requirement and the associated monitoring, record keeping, reporting and testing requirements with the regenerative thermal oxidizer control requirement and the associated monitoring, record keeping, reporting and testing requirements.
- b. This modification also accounts for a revision of the emissions calculation based on the DAPC guidance dated 11/21/96. This results in a 18.88 tons OC/yr decrease in the allowable mass emissions.
2. Emissions unit K006 is scheduled to be shut down in 2004 and it will be replaced by emissions unit K010.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K006 - Heatset Web Offset Printing Line (HWOPL) with regenerative thermal oxidizer (RTO)	none	none

2. Additional Terms and Conditions

2.a none

II. Operational Restrictions

none

III. Monitoring and/or Recordkeeping Requirements

none

IV. Reporting Requirements

none

V. Testing Requirements

none

VI. Miscellaneous Requirements

none

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Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K010 - Heatset Web Offset Printing Line (HWOPL) with regenerative thermal oxidizer (RTO)	OAC rule 3745-31-05(A)(3)	<p>The organic compound (OC) emissions excluding cleanup from this emissions unit shall not exceed 1.83 lbs/hr and 5.64 tons/yr.</p> <p>The organic compound (OC) emissions from cleanup for this emissions unit shall not exceed 3.63 tons/yr.</p> <p>The RTO shall meet a minimum destruction efficiency of 97%. (see A.I.2.b)</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G).</p> <p>see A.II.1.</p>
	OAC rule 3745-21-07(G)	

2. Additional Terms and Conditions

- 2.a The 1.83 lbs OC/hour limit was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

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- 2.b** The dryer-related organic compound emissions from this emissions unit shall be controlled at all times through the use of a regenerative thermal oxidizer. The thermal oxidizer shall reduce emissions of organic materials, such that 97%, or more, of the carbon in the organic material is incinerated.

(Emission units K001, K002, K004 and K006/K010 are commonly controlled with a RTO with a destruction/reduction efficiency of 97%)

II. Operational Restrictions

1. The use of any photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.
2. The average combustion temperature within the regenerative thermal oxidizer, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
3. The hand wash cleanup material is used to clean rollers and blankets and for other general purposes. The cleanup cloths shall be stored in closed containers.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the company identification of each ink, fountain solution and cleanup material employed in this emissions unit; and
 - b. documentation on whether or not each ink, fountain solution and cleanup material employed is a photochemically reactive material.
2. The permittee shall operate and maintain continuous temperature monitors and recorder(s) that measure and record(s) the combustion temperature within the regenerative thermal oxidizer when the emission is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorder(s) shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information each day:

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- a. A log of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.
 - b. All 3-hour blocks of time during which the average combustion temperature within the regenerative thermal oxidizer, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
3. The permittee shall collect and record the following information each month for the inks and fountain solutions employed in this emissions unit:
- a. The company identification for each ink and fountain solution employed.
 - b. The amount of each ink employed (in pounds).
 - c. The number of gallons of each fountain solution employed.
 - d. The organic compound content of each ink, in percent by weight.
 - e. The organic compound content of each fountain solution, in pounds per gallon.
 - f. The total potential organic compound emission rates for all inks, in pounds [i.e., the summation of (b x d) for all inks].
 - g. The total potential organic compound emission rate for all fountain solutions, in pounds [i.e., the summation of (c x e) for all fountain solutions].
 - h. The total controlled organic compound emission rate for all inks and fountain solutions, in pounds (for the calculation method, refer to section V.1.b).
4. The permittee shall collect and record the following information each month for the cleanup material employed in this emissions unit:
- a. The company identification for each cleanup material employed.
 - b. The number of gallons of each cleanup material employed.
 - c. The organic compound content of each cleanup material employed, in pounds per gallon.
 - d. The total potential organic compound emission rate for all cleanup materials, in pounds [i.e., the summation of (b x c) for all cleanup materials].
 - e. The total controlled organic compound emission rate for all cleanup materials, in pounds (for the calculation method, refer to section V.1.c).

IV. Reporting Requirements

1. The permittee shall submit deviation reports that identify the days during which photochemically reactive materials were employed in this emissions unit. Each report shall identify the cause for the use of the photochemically reactive material(s), and the estimated total quantity of material(s) emitted during each such day, in pounds. Each report shall be submitted to the Director (appropriate DO or LAA) within 30 days of the deviation.
2. In accordance with paragraph A.1.c. of the General Terms and Conditions of this permit, the permittee shall submit quarterly deviation (excursion) reports that include an identification of all 3-hour blocks of time (when the emissions unit was in operation) during which the average combustion temperature within the regenerative thermal oxidizer did not comply with the temperature limitation above.
3. The permittee also shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.

V. Testing Requirements

1. Compliance Method:

Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation-
1.83 lbs/hr OC, excluding cleanup

Applicable Compliance Method-

Compliance with the hourly limitation shall be determined as follows:

- i. The total potential organic compound emission rate from the ink, based upon the maximum hourly ink usage and respective maximum OC content, shall be multiplied by a factor of 0.80*. The product shall then be multiplied by a factor of 1 minus the destruction efficiency from the most recent performance test that demonstrated the emissions unit was in compliance.
- ii. The total potential organic compound emission rate from the fountain solution, based upon the maximum hourly fountain solution usage and respective maximum OC content, shall be multiplied by a factor of 0.70*. The product shall then be multiplied by a factor of 1 minus the destruction efficiency from the most recent

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performance test that demonstrated the emissions unit was in compliance.

- iii. The total potential fugitive organic compound emission rate from the fountain solution, based upon the maximum hourly fountain solution usage and respective maximum OC content, shall be multiplied by a factor of 0.30* (to account for a 30% fugitive emission release).
 - iv. The maximum hourly organic compound emission rate, in pounds, shall then be the sum of i, ii, and iii.
- b. Emission Limitation-
5.64 tons/yr OC, excluding cleanup

Applicable Compliance Method-

Compliance with the limitation above shall be determined based on the record keeping requirements specified in Section A.III. and the following calculation methodology:

- i. The total potential organic compound emission rate from the inks (in pounds), as required to be recorded in section A.III.3.f., shall be multiplied by a factor of 0.80*. The product shall then be multiplied by a factor of 1 minus the destruction efficiency from the most recent performance test that demonstrated the emissions unit was in compliance.
- ii. The total potential organic compound emission rate from the fountain solutions (in pounds), as required to be recorded in section A.III.3.g., shall be multiplied by a factor of 0.70*. The product shall then be multiplied by a factor of 1 minus the destruction efficiency from the most recent performance test that demonstrated the emissions unit was in compliance.
- iii. The total organic compound usage rate from the fountain solutions, as required to be recorded in Section A.III.3.g., shall be multiplied by a factor of 0.30*.
- iv. The total monthly organic compound emission rate, excluding cleanup (in tons) shall be the sum of the products from i, ii, and iii, divided by 2000 lbs/ton.
- v. The annual organic compound emission rate, excluding cleanup (in tons) shall then be the sum of the 12 monthly organic compound emission rates, from 1.b.iv above, for the calendar year.

* Per DAPC guidance, the following assumptions will be used in calculating the OC emissions for this emissions unit: 20 percent of the ink solvent is retained in the web and the remaining 80 percent is vented to the regenerative thermal incinerator. 30 percent of the fountain solution emissions is fugitive, and 70 percent is vented to the regenerative thermal oxidizer. Until additional emission tests are conducted, the destruction efficiency of 97% shall be used in this calculation.

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- c. Emission Limitations-
3.63 tons/yr OC, from cleanup

Applicable Compliance Method-

Compliance with the limitation above shall be determined based on the record keeping requirements specified in Section A.III.4. and the following calculation methodology:

- i. The total monthly organic compound usage rate from cleanup (in pounds), as required to be recorded in section A.III.4.d., shall be multiplied by a factor of 0.50** (50% fugitive emission release), and then divided by 2000 lbs/ton.
- ii. The annual organic compound emission rate (for cleanup, in tons) shall then be the sum of the 12 monthly organic compound emission rates, from 1.c.i. above, for the calendar year.

** Per DAPC guidance, the cleanup operations can assume 50% of the solvent is retained in the cloths and 50% is emitted as fugitive, if the solvent has a vapor pressure of 10 mmHg or lower at 20 degrees Celsius (68 deg F). If the cleanup solvent does not have a vapor pressure of 10 mmHg or lower at 20 degrees Celsius (68 deg F), then 100% of the solvent shall be counted toward fugitive emissions.

2. USEPA Method 24A shall be used to determine the VOC contents for the inks, fountain solutions and cleanup materials. If, pursuant to section 4.3 of method 24A, 40 CFR Part 60, Appendix A, the permittee determines that Method 24A cannot be used for a particular ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24A.
3. Within 12 months after permit issuance, the permittee shall conduct, or have conducted, an emission test(s) for this emissions unit in order to demonstrate compliance with the destruction efficiency for organic compounds and the allowable mass emission rate for OC. The organic compounds test(s) shall be conducted in accordance with the test methods and procedures specified in Methods 25 or 25A of 40 CFR, Part 60, Appendix A. The destruction efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases. The tests shall be conducted while the emissions unit is operating at or near maximum capacity.

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Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the field office's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information regarding the emissions unit operating parameters.

A comprehensive written report on the results of the emissions test(s) shall be submitted within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

VI. Miscellaneous Requirements

1. Emissions unit K010 is scheduled to replace an existing press (K006) after it is shut down in 2004.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K010 - 4 unit Harris NC 966 printing press w/RTO	none	none

2. Additional Terms and Conditions

- 2.a none

II. Operational Restrictions

none

III. Monitoring and/or Recordkeeping Requirements

none

IV. Reporting Requirements

none

V. Testing Requirements

none

VI. Miscellaneous Requirements

none