



State of Ohio Environmental Protection Agency

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RE: **FINAL PERMIT TO INSTALL MODIFICATION CERTIFIED MAIL**

HURON COUNTY

Application No: 03-07171

Y	TOXIC REVIEW
	PSD
Y	SYNTHETIC MINOR
	CEMS
	MACT
	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

DATE: 2/1/2001

R R Donnelley & Sons Company  
Christopher Hassmann  
1145 Conwell Ave  
Willard, OH 448880001

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

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  
236 East Town Street, Room 300  
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo, Manager  
Field Operations and Permit Section  
Division of Air Pollution Control

CC: USEPA

NWDO

## FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 03-07171

Application Number: **03-07171**APS Premise Number: **0339030135**Permit Fee: **\$0**Name of Facility: **R R Donnelley & Sons Company**Person to Contact: **Christopher Hassmann**Address: **1145 Conwell Ave****Willard, OH 448880001**

Location of proposed air contaminant source(s) [emissions unit(s)]:

**1145 Conwell Ave  
Willard, OHIO**

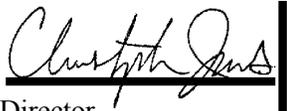
Description of modification:

**Modification to PTI #03-07171 issued 07/07/1994 to revise OC and PE emissions limitations in accordance with current engineering guides and USEPA guidance documents.**

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification 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 source(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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency



Director

**GENERAL PERMIT CONDITIONS**

**TERMINATION OF PERMIT TO INSTALL**

Substantial construction for installation must take place within 18 months of the effective date of this permit. 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.

**NOTICE OF INSPECTION**

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

**CONSTRUCTION OF NEW SOURCES**

The proposed source(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 are inadequate or cannot meet applicable standards.

If the construction of the proposed source(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 Ohio Administrative Code (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 applicable standards.

**PERMIT TO INSTALL FEE**

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

**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.

**APPLICABILITY**

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

**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.

**PERMIT TO OPERATE APPLICATION AND OPERATION AFTER COMPLETION OF CONSTRUCTION**

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).

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 thirty (30) days after commencing operation of the source(s) covered by this permit.

**AIR EMISSION SUMMARY**

The air contaminant emissions units listed below comprise the Permit to Install for **R R Donnelley & Sons Company** located in **HURON** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
K009	OSM Press 335 with Thermal Oxidizer #2	Use of Thermal Oxidizer and Compliance with the Terms of this Permit	3745-31-05 3745-17-11 3745-17-07 3745-21-07(G)	PM 0.1 lb/hr VOC* 15.3 lbs/hr (and AST&C's)
K010	OMW Press 326 with Thermal Oxidizer #2	Use of Thermal Oxidizer and Compliance with the Terms of this Permit	3745-31-05 3745-17-11 3745-17-07 3745-21-07(G)	PM 0.1 lb/hr VOC* 13.7 lbs/hr (and AST&C's)
K011	OSM Press 336 with Thermal Oxidizer #2	Use of Thermal Oxidizer and Compliance with the Terms of this Permit	3745-31-05 3745-17-11 3745-17-07 3745-21-07(G)	PM 0.1 lb/hr VOC* 14.2 lbs/hr (and AST&C's)
K012	OSM Press 380 with Thermal Oxidizer #3	Use of Thermal Oxidizer and Compliance with the Terms of this Permit	3745-31-05 3745-17-11 3745-17-07 3745-21-07(G)	PM 0.1 lb/hr VOC* 14.1 lbs/hr (and AST&C's)

**SUMMARY**  
**TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons/Year</u>
PM	1.76
VOC	143.1

\*Includes clean up materials

**PERFORMANCE TEST REQUIREMENTS**

The permittee shall conduct, or have conducted, performance testing on the air contaminant source(s) in accordance with procedures approved by the Agency. Two copies of the written report describing the test procedures followed and the results of such tests shall be submitted and signed by the person responsible for the test. The Director, or an Ohio EPA representative, shall be allowed to witness the test, examine testing equipment, and require the acquisition or submission of data and information necessary to assure that the source operation and testing procedures provide a valid characterization of the emissions from the source and/or the performance of the control equipment.

- A. A completed Intent to Test form shall be submitted to the appropriate Ohio EPA District Office or Local Air Pollution Control Agency where the original permit application was filed. This notice shall be made 30 days in advance and shall specify the source operating parameters, the proposed test procedures, and the time, date, place and person(s) conducting such tests.
- B. Two copies of the test results shall be submitted within 30 days after the completion of the performance test.
- C. Tests shall be performed for the following source(s) and pollutants(s):

<u>Source</u>	<u>Pollutant(s)</u>
K009, K010, K011 Thermal Oxidizer #2 K012 to #3	VOC

**MONITORING REQUIREMENTS**

A temperature monitor shall be installed on K009, K010, K011, K012. The monitoring equipment shall be installed and maintained in accordance with the applicable portions of 40 CFR Part 60 - Standards of Performance for New Stationary Sources.

**R R Donnelley & Sons Company**

**PTI Application: 03-07171**

**Modification Issued: 2/1/2001**

Facility ID: **0339030135**

Within 30 days after the installation of the continuous monitoring and recording equipment, this facility shall conduct a performance specification test of such equipment pursuant to Section 3704.03(I) of the Ohio Revised Code and 40 CFR Part 60, Appendix B, Performance Specification Test 1. Personnel from the Ohio EPA field office shall be permitted to witness the performance specification test, and two copies of the test results shall be submitted to the Ohio EPA field office within 45 days after the test is completed.

Pursuant to 40 CFR Parts 60.7 and 60.13(h), this facility shall submit reports on a quarterly basis to the Ohio EPA field office documenting all instances of opacity values in excess of the limitations specified in OAC rule 3745-17-07 or any limitations specified in the terms and conditions of this permit. These quarterly excess emission reports shall be submitted by February 1, May 1, August 1, and November 1 of each year and shall cover the data obtained during the previous calendar quarters.

### **RECORD(S) RETENTION AND AVAILABILITY**

All records required by this Permit to Install shall be retained on file for a period of not less than three years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

### **WASTE DISPOSAL**

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

### **MAINTENANCE OF EQUIPMENT**

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

### **MALFUNCTION/ABATEMENT**

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the Ohio Environmental Protection Agency Northwest District Office - DAPC, 347 North Dunbridge Road, P.O. Box 466, Bowling Green, Ohio 43402.

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

### **AIR POLLUTION NUISANCES PROHIBITED**

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

**ADDITIONAL SPECIAL TERMS AND CONDITIONS**

1. R.R. Donnelley and Sons Company shall employ only coatings and clean up materials which are non-photochemically reactive as defined by OAC Rule 3745-21-01 (C)(5). This determination shall be made based on the actual formulation of the coatings/clean up materials after any final in-plant reducing or thinning and prior to application of the product.
2. The R.R. Donnelley and Sons Company shall comply with the following usage restriction for sources K009, K010, K011 and K012:
  - A. Usage of printing ink with a maximum VOC content of 3.75 pounds VOC per gallon:
    1. K009 is limited to 133,000 gallons of ink per rolling 12 month period or 26.6 gallons per hour.
    2. K010 is limited to 97,000 gallons of ink per rolling 12 month period or 19.4 gallons per hour.
    3. K011 is limited to 124,000 gallons of ink per rolling 12 month period or 24.8 gallons per hour.
    4. K012 is limited to 124,000 gallons of ink per rolling 12 month period or 24.8 gallons per hour.
  - B. Usage of fountain solution with a maximum VOC content of 0.25 pound VOC per gallon solution:
    1. K009 is limited to 227,500 gallons of fountain solution per rolling 12 month period or 45.5 gallons per hour.
    2. K010 is limited to 125,500 gallons of fountain solution per rolling 12 month period or 25.1 gallons per hour.
    3. K011 is limited to 197,000 gallons of fountain solution per rolling 12 month period or 39.4 gallons per hour.
    4. K012 is limited to 137,500 gallons of fountain solution per rolling 12 month period or 27.5 gallons per hour.
  - C. Usage of clean up materials with a maximum VOC content of 7.5 pounds VOC per gallon:
    1. K009 is limited to 4,500 gallons per rolling 12 month period or 0.9 gallon per hour.
    2. K010 is limited to 7,000 gallons per rolling 12 month period or 104 gallons per hour.

3. K011 is limited to 4,500 gallons per rolling 12 month period or 0.9 gallon per hour.
4. K012 is limited to 5,000 gallons per rolling 12 month period or 1.0 gallon per hour.
3. The R.R. Donnelley and Sons Company shall ensure that the control efficiency of the thermal oxidizers for each source is not less than 90 percent at all times. The sources shall not be operated unless the respective thermal oxidizer is in use. The temperature of the thermal oxidizers shall not be less than 1350 degrees F.
4. The R.R. Donnelley and Sons Company shall maintain monthly records which list the following information for each graphic arts material employed for Sources K009, K010, K011 and K012:
  - A. Company identification of the graphic arts materials.
  - B. The number of gallons employed per month.
  - C. The VOC content, in percent by volume.
  - D. The VOC density, in pounds per gallon.
  - E. The water content, in percent by volume (if any).
  - F. The nonvolatile (solids) content, in percent by volume.

Such records shall include the monthly hours of source operation and graphic materials used over a known period of time so that hourly graphic materials use may be calculated.

R.R. Donnelley and Sons Company shall continuously monitor and maintain records of the temperature of the thermal oxidizers for each source.

These records shall be retained in the company's files for a period of not less than three years and shall be made available to the Ohio EPA for review during normal business hours.

5. The R.R. Donnelley and Sons Company shall immediately report to the Ohio EPA, Northwest District Office, Division of Air Pollution Control, of any exceedance of the emission, opacity or gallon per day limitations.

This facility shall submit an annual report to the Ohio EPA, Northwest District Office, documenting each exceedances and including the following additional information:

- A. The cause of the excursion; and,
- B. The steps that have been and/or will be taken to correct the violation and to prevent future occurrences.

If there have been no exceedances, then a report stating that fact must still be submitted. The report shall be submitted on or before January 15 of each year and shall cover the previous twelve month period.

6. All reports and notifications shall be sent to or submitted to the Ohio EPA, Northwest District Office, 347 North Dunbridge Road, Bowling Green, Ohio 43402.