State of Ohio Environmental Protection Agency

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

Street Address: 122 S. Front Street
Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329
Mailing Address: Lazarus Gov. Center P.O. Box 1049

Application No: 08-04287
Fac ID: 0857093056
DATE: 6/16/2005

Trader Publishing Co
Joe Padgett
4500 Lyons Rd
Miamisburg, OH 453420000

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
309 South Fourth Street, Room 222
Columbus, Ohio 43215

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA **RAPCA**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install **Issue Date: 6/16/2005**
Terms and Conditions **Effective Date: 6/16/2005**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 08-04287

Application Number:	08-04287
Facility ID:	0857093056
Permit Fee:	**$100**
Name of Facility:	Trader Publishing Co
Person to Contact:	Joe Padgett
Address:	4500 Lyons Rd Miamisburg, OH 453420000

Location of proposed air contaminant source(s) [emissions unit(s)]:
4500 Lyons Rd
Miamisburg, **Ohio**

Description of proposed emissions unit(s):
administrative modification to replace printing unit 43 with printing unit 46.

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

Joseph P. Koncelik

Director

Part I - GENERAL TERMS AND CONDITIONS

A. 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 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 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. Records Retention Requirements

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.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. 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 verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. 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 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. 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 emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. 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.

8. 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.

9. 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.

10. 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.

11. Applicability

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.

12. 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.

13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This 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 emissions unit(s) covered by this permit.

14. 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.

15. 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.

B. 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

Pollutant	Tons Per Year
OC	6.45

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K001 - Goss community non-heatset web offset lithographic printing press	OAC rule 3745-31-05(A)(3)	The organic compound (OC) emissions from this emissions unit shall not exceed 1.47 lbs/hour, 35.3 lbs/day and 6.45 tons per year (TPY) including cleanup. See A.2.a.
	OAC rule 3745-21-07(G)(2)	The emission limitations specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

2.a The 1.47 lbs/hr OC limitation is being established for PTI purposes to reflect the potential to emit for this emissions limit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

B. Operational Restrictions

1. The ink usage in this emissions unit shall not exceed 42,500 pounds per month and the OC content of the ink shall not exceed 10 percent by weight.

2. The fountain solution usage in this emissions unit shall not exceed 366 gallons per month and the OC content of the fountain solution shall not exceed 0.83 pound per gallon.

3. The cleanup material usage in this emissions unit shall not exceed 85.5 gallons per month and the OC content of the cleanup material shall not exceed 6.54 pounds per gallon.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall maintain monthly records which list the following information for each ink, fountain solution and cleanup material employed in this emissions unit:

a. The company identification for each ink, fountain solution and cleanup material employed.

b. The weight, in pounds, of ink applied in this emissions unit.

c. The OC content of each ink, in percent by weight.

d. The number of gallons of each , fountain solution and cleanup material employed.

e. The OC content of each , fountain solution and cleanup material, in pounds per gallon.

f. The total OC emission rate from all inks employed, based on a 5 percent , evaporation rate in pounds per month. (b x c) x (1 - 0.95).

g. The total OC emission rate from all fountain solutions and cleanup materials employed, in pounds per month (d x e).

h. The total number of days the emissions unit was in operation for the month.

i. The average daily OC emission rate for all inks and cleanup materials, , in pounds per day (f + g)/(h).

2. The permit to install for this emissions unit K001 was evaluated based on the actual materials (coatings) employed, and the design parameters of the emissions units exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarized the results of the modeling for the "worst-case" pollutant(s).

Pollutant: ethylene glycol

TLV(mg/m^3): 101,546

Maximum Hourly Emission Rate (lbs/hr): 0.42

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m^3): 130

MAGLC(ug/m^3): 1,015

Pollutant: Stoddard solvent

TLV(mg/m^3): 572,597

Maximum Hourly Emission Rate (lbs/hr): 0.62

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m^3): 192

MAGLC(ug/m^3): 5,726

Physical changes to or changes in the method of operation of the emissions unit after its installation could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the Permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of the new materials, that would result in the emission of a compound with a lower Threshold Limit Value(TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)", than the lowest TLV value previously modeled;

b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic contaminant not, previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

a. A description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. Where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include an identification of each month during which the average daily organic compound emission rate from all inks, fountain solution and cleanup materials exceeded 35.3 pounds per day, and the actual average daily organic compound emission rate for each such day. These reports shall be submitted in accordance with paragraph 2.b. of the General Terms and Conditions.

E. Testing Requirements

1. Compliance with the emission limitations in this permit shall be determined in accordance with the following methods:

a. Emission Limitation-
The OC emissions from this emissions unit shall not exceed 1.47 lbs/hour, including cleanup.

Applicable Compliance Method-

i. multiplying the maximum hourly ink usage (58.2 lbs/hour) by the maximum OC content of the ink (10 percent) multiplied by a web solvent retention factor of 95

percent (1-0.95), from USEPA document "Control of VOC Emissions from Offset Lithographic Printing" (9/93)plus the maximum hourly fountain solution usage rate (0.502 gallon/hour) multiplied by the OC content of the fountain solution (0.83 lb OC/gallon).

ii. multiplying the maximum hourly cleanup material usage (0.117 gallon/hour) by the maximum OC content of the cleanup material (6.54 lbs/gallon)

iii. Compliance shall be determined by the summation of the emissions from all ink, fountain solution and clean up materials employed (i + ii).

b. Emission Limitation-
The OC emissions from this emissions unit shall not exceed 35.3 lbs/day, including cleanup.

Applicable Compliance Method-
Compliance shall be based on record keeping as specified in section C.1.

c. Emission Limitation-
The OC emissions from this emissions unit shall not exceed 6.45 TPY, including cleanup.

Applicable Compliance Method-
Compliance shall be based on record keeping as specified in section C.1. and shall be the sum of the monthly OC emissions for the calendar year divided by 2000 lbs/ton.

F. Miscellaneous Requirements

1. PTI 08-4287 is a chapter 31 modification representing the addition of a new 4-high printing unit to the existing 34-unit printing press that supercedes PTI 08-04136 issued February 24, 2000. The 8 lbs/hr, including cleanup materials limitation represents a change from the previous PTI which excluded cleanup materials from the hourly limit. This change is in accordance with the specifications of OAC rule 3745-21-07(G)(2). This PTI does not result in any other changes in the allowable emissions from those established by PTI 08-04136.

2. In July 2003, a new 4-high unit was installed on the press, replacing one of the 2-high units, increasing the total units on the press to 40. This PTI has been administratively modified to reflect the increase in printing units while not increasing allowable emissions.

3. In June 2004, two new 4-high printing units were added to the press replacing two 2-high printing units and a single printing unit to make a 43 unit press. This PTI has been administratively

modified to reflect the increase in printing units while not increasing allowable emissions.

4. In May 2005, a new 4-high printing unit was added to the press replacing a mono printing unit. This PTI has been administratively modified to reflect the increase in printing units, to add air toxics policy terms for ethylene glycol and Stoddard solvent emissions, and to establish allowable emission rates on a potential to emit basis instead of compliance with OAC rule 3745-21-07(G)(2) .