

Facility ID: 0829110036 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 0829110036 Emissions Unit ID: R001 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
R001 - Lithographic printer, 40 inch, 6-color press with infrared drying oven	OAC rule 3745-31-05(A)(3) PTI 08-04732	The organic compound (OC) emissions from this emissions unit shall not exceed 7.3 tons per year. The requirements of this rule includes compliance with OAC rule 3745-21-07(G)(2). The OC emissions shall not exceed 8 pounds per hour and 40 pounds per day.
	OAC rule 3745-21-07(G)(2)	

2. **Additional Terms and Conditions**
 - (a) The hourly emission limitation was established 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 these terms.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for the purpose of determining annual compliance:
 - a. The name and identification of each material used;
 - b. The organic compound (OC) content for inks used, in % by weight;
 - c. The organic compound (OC) content for cleanup, fountain solution, and in-line coating used, in lbs/gallon;
 - d. The number of pounds of ink used;
 - e. The number of gallons of cleanup, fountain solution, and in-line coatings used;
 - f. The total organic compound (OC) emission rate for all materials, in pounds;
 - g. The number of days that the emissions unit operated; and
 - h. The average daily organic compound (OC) emission rate for the materials, i.e., (f)/(g).
2. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit (R001). To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worse case" each

pollutant(s):

Pollutant: Cumene

TLV (ug/m3): 245,787

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 993.8

MAGLC (ug/m3): 5,852

Physical changes or changes in the method of operation of the emissions unit that result in changes to the factors affecting the air toxic analysis could result in noncompliance with this permit to install. In order to avoid this noncompliance situation, prior to initiating any changes, permittees are required to conduct an evaluation to determine that the "Air Toxic Policy" is still satisfied. Changes that can affect the "Air Toxic Policy" include, but are not limited to, the following:

- a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of 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.).
3. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:
- a. The change is not otherwise considered a "modification" under OAC Chapter 3745-31;
 - b. The permittee can continue to comply with the allowable emission limitations specified in its permit to install; and,
 - c. Prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

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 air 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.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the average daily organic compound (OC) emissions, from this emissions unit, exceeded 40.0 pounds per day, and the actual average daily organic compound emissions for that month.
2. These quarterly deviation reports (excursion) reports shall be submitted to the Ohio EPA Central District Office or local air agency by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.
3. The permittee shall submit an annual report to the Director (the appropriate Ohio EPA District Office or local air agency) for this emissions unit that specifies the total OC emissions, in tons, from material usage. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:
Emission Limitation-
The organic compound (OC) emissions from this emissions unit shall not exceed 8.0 pounds per hour (lbs/hr).

Applicable Compliance Method-
Compliance shall be determined by summing the following hourly emission rates, i and ii., of all inks, fountain solutions, cleaning solvents, and in-line coatings.
 - i. Compliance shall be determined by multiplying the maximum lb/hour of ink usage by the maximum organic compound (OC) content (% by weight) of all inks employed and multiplying by 5% (Engineering Guide #68, release factor).
 - ii. Compliance shall be determined by multiplying the maximum gallon per hour usage for all cleaning solvents, fountain solutions, and in-line coatings by the corresponding maximum organic compound (OC) content (lbs/gallon) of all materials (except ink).

Emission Limitation-

The average daily organic compound (OC) emissions from this emissions unit shall not exceed 40.0 pounds OC/day.

Applicable Compliance Method-

Compliance shall be based upon record keeping as specified in C.1.

Emission Limitation-

The organic compound (OC) emissions from this emissions unit shall not exceed 7.3 TPY.

Applicable Compliance Method-

Compliance shall be based upon record keeping as specified in Section C.1. and shall be the sum of the average daily organic compound (OC) content emission rates for the calendar year. If compliance with the average daily limitation is achieved, then compliance with the annual limitation is also achieved.

F. **Miscellaneous Requirements**

1. None