

Facility ID: 0857093056 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: 0857093056 Emissions Unit ID: K001 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

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>
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.
	OAC rule 3745-21-07(G)(2)	See A.2.a. 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

- (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 ink, fountain solution and cleanup material employed.
 - e. The OC content of each ink, fountain solution and cleanup material, in pounds per gallon.
 - f. The total OC emission rate from all inks employed, based on a 5 percent ink emission rate, 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/m3): 101,546

Maximum Hourly Emission Rate (lbs/hr): 0.42

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 130

MAGLC(ug/m3): 1,015

Pollutant: Stoddard solvent

TLV(mg/m3): 572,597

Maximum Hourly Emission Rate (lbs/hr): 0.62

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 192

MAGLC(ug/m3): 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 3.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:

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).

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.

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. None