

Facility ID: 0857093211 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.

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[Go to Part II for Emissions Unit K003](#)

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Facility ID: 0857093211 Emissions Unit ID: K001 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>             |
|---|---|--|
| Press # 389 Harris 44" x 60", 7-color non-heatsheet offset, lithographic printing press | OAC rule 3745-31-05(A)(3)<br>PTI 08-04242 | 100.56 lbs/day and 18.36 tons/yr organic compounds including cleanup |

The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G).

See A.2.b.

OAC rule 3745-21-07(G)

**2. Additional Terms and Conditions**

- (a) The 100.56 pounds of OC per day limitation was established to reflect potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with this limit. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

**B. Operational Restrictions**

1. Pursuant to Ohio EPA Engineering Guide #68, if the permittee assumes a 50% reduction in organic compound emissions for cleanup materials, then the permittee shall store used shop towels in closed containers and send off-site for laundering.

**C. Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information each month for the entire facility for the purposes of determining the annual organic compound emissions:
  - a. the name and identification for each ink/varnish, fountain solution and cleanup material employed;
  - b. the number of gallons of each ink/varnish, fountain solution and cleanup material employed;
  - c. the organic compound content of each ink/varnish, fountain solution and cleanup material employed, in pounds per gallon;
  - d. the total potential organic compound emission rate for all the inks/varnishes, fountain solutions and cleanup materials, in pounds, for this emissions unit (i.e. the sum of the number of gallons of each material in b. multiplied by the material's respective OC content in c.); and
  - e. the actual organic compound emission rate, in pounds (for calculation method refer to Section E.1.b.\*);
  - f. The percentage of cleanup rags that are sent off-site for laundering.
2. 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.

**D. Reporting Requirements**

1. The permittee shall submit annual reports which specify the total organic compound emissions for this emissions unit for the previous calendar year. These reports shall be submitted to the Director (District Office or Local Air Agency) by January 31 of each year.

**E. Testing Requirements**

1. Compliance with the emission limitation in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:  
Emission Limitation -  
100.56 lbs OC/day

Applicable Compliance Method -  
Compliance shall be based upon the maximum hourly OC emission rate for this emissions unit, 4.19 lbs/hr multiplied by the maximum operating hours per day, 24.0 hours.  
Emission Limitation -  
18.36 tons OC/yr including cleanup

Applicable Compliance Method -

i. The total potential organic compound emission rates for inks and varnishes (in pounds), as required to be recorded in Section C.1.d, shall be summed for the calendar year and multiplied by a solvent loss factor of 0.05\*, for 5% solvent loss.

ii. The total potential organic compound emission rates for the fountain solution and all other liquid organic materials (in pounds), excluding ink/varnish and cleanup, as required to be recorded in Section C.1.d, shall be summed for the calendar year and multiplied by a factor of 1.0, for 100% solvent loss.

iii. The total potential organic compound emission rate from the cleanup materials (in pounds), as required to be recorded in Section C.1.d, shall be summed for the calendar year and multiplied by a factor of 0.5\*, for 50% solvent loss (for cleanup rags launder off-site only).

iv. The total annual organic compound emission rate shall be the sum of the result from (i), (ii) and (iii), divided by 2,000 pounds per ton, and the result shall be multiplied by the allocation factor (0.247) for this emissions unit, as determined by the Printing Industry of Ohio's "Enviroprint" manual, 1995.

\*Pursuant to Ohio EPA Engineering Guide #68, the following assumptions will be used in calculating the actual OC emissions for this emissions unit: 95% of the ink/varnish solvent is retained in the web and the remaining 5% is released to the atmosphere; 100% of the fountain solution solvent is released to the atmosphere; for any cleanup material with a vapor pressure less than 10 mm Hg at 20 degrees Celsius, which is applied with shop towels, and the towels are stored within a closed container, 50% of the solvent in the cleanup material is retained within the towel and the remaining 50% is released to the atmosphere.

2. Formulation data or USEPA Method 24A shall be used to determine the organic compound contents of the inks, varnishes, fountain solutions and cleanup materials.

**F. Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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Facility ID: 0857093211 Emissions Unit ID: K002 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>   |
|--|---|--|
| Press # 385 Harris 43" x 60", 7-color non-heatset sheetfed offset, lithographic printing press | OAC rule 3745-31-05(A)(3)<br>PTI 08-04242 | 102.96 lbs/day and 18.81 tons/yr organic compounds including cleanup<br><br>The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G).<br><br>See A.2.b. |

OAC rule 3745-21-07(G)

**2. Additional Terms and Conditions**

- (a) The 102.96 pounds of OC per day limitation was established to reflect potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with this limit.  
The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

**B. Operational Restrictions**

- 1. Pursuant to Ohio EPA Engineering Guide #68, if the permittee assumes a 50% reduction in organic compound emissions for cleanup materials, then the permittee shall store used shop towels in closed containers and send off-site for laundering.

**C. Monitoring and/or Record Keeping Requirements**

- 1. The permittee shall collect and record the following information each month for the entire facility for the purposes of determining the annual organic compound emissions:
  - a. the name and identification for each ink/varnish, fountain solution and cleanup material employed;
  - b. the number of gallons of each ink/varnish, fountain solution and cleanup material employed;
  - c. the organic compound content of each ink/varnish, fountain solution and cleanup material employed, in pounds per gallon;
  - d. the total potential organic compound emission rate for all the inks/varnishes, fountain solutions and cleanup materials, in pounds, for this emissions unit (i.e. the sum of the number of gallons of each material in b. multiplied by the material's respective OC content in c.); and
  - e. the actual organic compound emission rate, in pounds (for calculation method refer to Section E.1.b.\*);
  - f. The percentage of cleanup rags that are sent off-site for laundering.
- 2. 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.

**D. Reporting Requirements**

- 1. The permittee shall submit annual reports which specify the total organic compound emissions for this emissions unit for the previous calendar year. These reports shall be submitted to the Director (District Office or Local Air Agency) by January 31 of each year.

**E. Testing Requirements**

- 1. Compliance with the emission limitation in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:
  - Emission Limitation -  
102.96 lbs OC/day
  - Applicable Compliance Method -  
Compliance shall be based upon the maximum hourly OC emission rate for this emissions unit, 4.29 lbs/hr multiplied by the maximum operating hours per day, 24.0 hours.
  - Emission Limitation -  
18.81 tons OC/yr including cleanup
  - Applicable Compliance Method -
    - i. The total potential organic compound emission rates for inks and varnishes (in pounds), as required to be recorded in Section C.1.d, shall be summed for the calendar year and multiplied by a solvent loss factor of 0.05\*, for 5% solvent loss.
    - ii. The total potential organic compound emission rates for the fountain solution and all other liquid organic materials (in pounds), excluding ink/varnish and cleanup, as required to be recorded in Section C.1.d, shall be summed for the calendar year and multiplied by a factor of 1.0, for 100% solvent loss.
    - iii. The total potential organic compound emission rate from the cleanup materials (in pounds), as required to be recorded in Section C.1.d, shall be summed for the calendar year and multiplied by a factor of 0.5\*, for 50% solvent loss (for cleanup rags launder off-site only).

- iv. The total annual organic compound emission rate shall be the sum of the result from (i), (ii) and (iii), divided by 2,000 pounds per ton, and the result shall be multiplied by the allocation factor (0.253) for this emissions unit, as determined by the Printing Industry of Ohio's "Enviroprint" manual, 1995.

\*Pursuant to Ohio EPA Engineering Guide #68, the following assumptions will be used in calculating the actual OC emissions for this emissions unit: 95% of the ink/varnish solvent is retained in the web and the remaining 5% is released to the atmosphere; 100% of the fountain solution solvent is released to the atmosphere; for any cleanup material with a vapor pressure less than 10 mm Hg at 20 degrees Celsius, which is applied with shop towels, and the towels are stored within a closed container, 50% of the solvent in the cleanup material is retained within the towel and the remaining 50% is released to the atmosphere.

- 2. Formulation data or USEPA Method 24A shall be used to determine the organic compound contents of the inks, varnishes, fountain solutions and cleanup materials.

**F. Miscellaneous Requirements**

- 1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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Facility ID: 0857093211 Emissions Unit ID: K003 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>             |
|--|---|--|
| Press # 390 Mitsubishi 56" x 40", 7-color non-heatset sheetfed offset, lithographic printing press | OAC rule 3745-31-05(A)(3)<br>PTI 08-04242 | 203.76 lbs/day and 37.18 tons/yr organic compounds including cleanup |

The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G).

See A.2.b.

OAC rule 3745-21-07(G)

**2. Additional Terms and Conditions**

- (a) The 203.76 pounds of OC per day limitation was established to reflect potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with this limit. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

**B. Operational Restrictions**

- 1. Pursuant to Ohio EPA Engineering Guide #68, if the permittee assumes a 50% reduction in organic compound emissions for cleanup materials, then the permittee shall store used shop towels in closed containers and send off-site for laundering.

**C. Monitoring and/or Record Keeping Requirements**

- 1. The permittee shall collect and record the following information each month for the entire facility for the purposes of determining the annual organic compound emissions:
  - a. the name and identification for each ink/varnish, fountain solution and cleanup material employed;

- b. the number of gallons of each ink/varnish, fountain solution and cleanup material employed;
  - c. the organic compound content of each ink/varnish, fountain solution and cleanup material employed, in pounds per gallon;
  - d. the total potential organic compound emission rate for all the inks/varnishes, fountain solutions and cleanup materials, in pounds, for this emissions unit (i.e. the sum of the number of gallons of each material in b. multiplied by the material's respective OC content in c.); and
  - e. the actual organic compound emission rate, in pounds (for calculation method refer to Section E.1.b.\*);
  - f. The percentage of cleanup rags that are sent off-site for laundering.
2. 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.
- D. Reporting Requirements**
1. The permittee shall submit annual reports which specify the total organic compound emissions for this emissions unit for the previous calendar year. These reports shall be submitted to the Director (District Office or Local Air Agency) by January 31 of each year.
- E. Testing Requirements**
1. Compliance with the emission limitation in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:
- Emission Limitation -  
203.76 lbs OC/day
- Applicable Compliance Method -  
Compliance shall be based upon the maximum hourly OC emission rate for this emissions unit, 8.49 lbs/hr multiplied by the maximum operating hours per day, 24.0 hours.
- Emission Limitation -  
37.18 tons OC/yr including cleanup
- Applicable Compliance Method -
- i. The total potential organic compound emission rates for inks and varnishes (in pounds), as required to be recorded in Section C.1.d, shall be summed for the calendar year and multiplied by a solvent loss factor of 0.05\*, for 5% solvent loss.
  - ii. The total potential organic compound emission rates for the fountain solution and all other liquid organic materials (in pounds), excluding ink/varnish and cleanup, as required to be recorded in Section C.1.d, shall be summed for the calendar year and multiplied by a factor of 1.0, for 100% solvent loss.
  - iii. The total potential organic compound emission rate from the cleanup materials (in pounds), as required to be recorded in Section C.1.d, shall be summed for the calendar year and multiplied by a factor of 0.5\*, for 50% solvent loss (for cleanup rags launder off-site only).
  - iv. The total annual organic compound emission rate shall be the sum of the result from (i), (ii) and (iii), divided by 2,000 pounds per ton, and the result shall be multiplied by the allocation factor (0.5) for this emissions unit, as determined by the Printing Industry of Ohio's "Enviroprint" manual, 1995.
- \*Pursuant to Ohio EPA Engineering Guide #68, the following assumptions will be used in calculating the actual OC emissions for this emissions unit: 95% of the ink/varnish solvent is retained in the web and the remaining 5% is released to the atmosphere; 100% of the fountain solution solvent is released to the atmosphere; for any cleanup material with a vapor pressure less than 10 mm Hg at 20 degrees Celsius, which is applied with shop towels, and the towels are stored within a closed container, 50% of the solvent in the cleanup material is retained within the towel and the remaining 50% is released to the atmosphere.
2. Formulation data or USEPA Method 24A shall be used to determine the organic compound contents of the inks, varnishes, fountain solutions and cleanup materials.
- F. Miscellaneous Requirements**
1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.