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Facility Name: **Industrial Printing Company**

Application Number: **04-1143**

Date: **September 10, 1998**

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

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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.

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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

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

SOURCE OPERATION 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 and regulations.

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Industrial Printing Company** located in **Lucas** 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 & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
K006	Heatset web offset printing press; Komori Lithrone 28	Non-photochemically reactive material for ink and fountain solution. Compliance with the Ohio EPA Air Toxics Policy	3745-21-07 (G) 3745-31-05	Use of printing ink and fountain solutions that are non-photochemically reactive.* 2.58 pounds/hour OC 11.32 tons/year OC
K007	Non-Heatset web offset printing press; Komori Sprint 28	Non-photochemically reactive material for ink and fountain solution. Compliance with the Ohio EPA Air Toxics Policy	3745-21-07 (G) 3745-31-05	Use of printing ink and fountain solutions that are non-photochemically reactive.* 1.57 pounds/hour OC 6.88 tons/year OC

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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* The emission limitation required by this applicable rule is the same as the emission limitation determined by Best Available Technology.

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SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
OC	18.2

CONSTRUCTION STATUS

The **Toledo Environmental Services Division** shall be notified in writing as to (a) the construction starting date, (b) the construction completion date, and (c) the date the facilities were placed into operation for the following sources: **K006 and K007**.

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.

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Toledo Environmental Services Division, 348 South Erie Street, Toledo, OH 43602**.

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.

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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 **Toledo Environmental Services Division, 348 South Erie Street, Toledo, OH 43602.**

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.

NINETY DAY OPERATING PERIOD

The facility will be permitted to operate during a 90-day period in accordance with OAC Rule 3745-35-02(C)(4)(b). The purpose of this period of operation is to fulfill the performance tests conditions used in the determination of compliance with the provisions of this Permit to Install or other applicable Ohio EPA rules.

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

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to startup of the source.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

I. K006; Heatset line (Komori Lithrone 28)

A. OPERATIONAL RESTRICTIONS

1. None.

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B. MONITORING AND/OR RECORDKEEPING REQUIREMENTS

1. The permittee shall collect and record the following information each week for this line:
 - a. the name and identification number of each material employed (e.g., printing inks, fountain solution, clean-up material);
 - b. the percent of OC employed in either percent by weight or percent by volume;
 - c. the amount of each material employed in either pounds or gallons;
 - d. the hours of operation per week for this source; and,
 - e. the pounds per hour OC and tons per yr OC (based on a rolling 52-weeks)

C. REPORTING REQUIREMENTS:

1. The permittee shall submit quarterly deviation (excursion) reports to the City of Toledo Division of Environmental Services in writing for any record showing the following:
 - a. the 2.58 lbs/hr OC emission limit is exceeded; and,
 - b. the printing inks or fountain solutions were photochemically reactive.

The notification shall include a copy of such records and the summation of the rolling 52-week emissions in tons/yr OC and shall be sent to the City of Toledo Division of Environmental Services within 30 days following the end of the calendar quarter.

D. TESTING REQUIREMENTS:

1. Compliance with the following emission limitations shall be determined in accordance with the

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following method(s):

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a. Emission Limitation

Employ only non-photochemically reactive materials.

Applicable Compliance Method

Exclusion of materials meeting the definition in OAC 3745-21-01(C)(5).

b. Emission Limitation

2.58 lbs/hr of OC

Applicable Compliance Method

Compliance shall be demonstrated through the recordkeeping requirements of Additional Special Term and Condition I.B.. USEPA Method 24 and 24A shall be used to demonstrate the OC content.

c. Emission Limitation

11.32 tons/yr OC

Applicable Compliance Method

Compliance shall be demonstrated through the recordkeeping requirements of Additional Special Term and Condition I.B.1.e..

E. MISCELLANEOUS REQUIREMENTS

1. This permit allows the use of the materials specified by the permittee in the application. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the 2-butoxyethanol and petroleum distillate emission limitations specified in this permit were established in accordance with the Ohio EPA's "Air Toxics Policy" and are based on both the material formulation data and the design parameters of the

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emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the Screen3 model and a comparison of the predicted 1 hour maximum ground-level concentration to the MAGLC. The following summarizes the results of the modeling for each pollutant:

Pollutant: Petroleum Distillate

TLV (ug/m3):525,000

Maximum Hourly Emission Rate (lbs/hr):0.845

**Predicted 1 Hour Maximum Ground-Level
Concentration (ug/m3):145.0**

**Maximum Acceptable Ground-Level Concentration
(MAGLC) (ug/m3):12,500**

Pollutant: 2-butoxyethanol

TLV (ug/m3):121,000

Maximum Hourly Emission Rate (lbs/hr):0.015

**Predicted 1 Hour Maximum Ground-Level
Concentration (ug/m3):2.721**

**Maximum Acceptable Ground-Level Concentration
(MAGLC) (ug/m3):2,880**

2. Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval from the Toledo Environmental Services Division are required, including the possible issuance of modifications to this PTI and the operating permit:
 - a. any changes in the composition of the 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 specified above;
 - b. any change to the emissions unit or its

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- exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC specified in the above table;
- c. a reduction in the TLV by the ACGIH for any of the materials that, at the maximum hourly emission rate specified in the above table, would result in an exceedance of the new MAGLC;
 - d. any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01; and,
 - e. any change in the composition of the materials, or use of new materials, that would result in the emission of any of the exempted organic compounds included in the definition of "VOC" [OAC rule 3745-21-01(B) (6)].
3. The permittee shall determine all materials that are classified as Hazardous Air Pollutants (HAPs) as defined in the Clean Air Act Amendments of 1990, Title III, Section 112(b).
 4. The permittee shall calculate on a rolling 12-month basis the amount of individual HAPs and the total amount of HAPs in tons/yr for all sources located at this location.
 5. The permittee shall be limited to 10 tons/yr of an individual HAP and 25 tons/yr total HAPs based on a rolling 12-month basis for all sources located at this location. If these limits are exceeded, the permittee shall either apply for a Title V operating permit or apply for a Federally Enforceable State Operating Permit (FESOP) within 30 days after the exceedance.

II. K007; Non-heatset line (Komori Sprint 28)

A. OPERATIONAL RESTRICTIONS

1. None.

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B. MONITORING AND/OR RECORDKEEPING REQUIREMENTS

1. The permittee shall collect and record the following information each week for this line:
 - a. the name and identification number of each material employed (e.g., printing inks, fountain solution, clean-up material);
 - b. the percent of OC employed in either percent by weight or percent by volume;
 - c. the amount of each material employed in either pounds or gallons;
 - d. the hours of operation per week for this source; and,
 - e. the pounds per hour OC and tons per yr OC (based on a rolling 52-weeks)

C. REPORTING REQUIREMENTS

1. The permittee shall submit quarterly deviation (excursion) reports to the City of Toledo Division of Environmental Services in writing for any record showing the following:
 - a. the 1.57 lbs/hr OC emission limit is exceeded; and,
 - b. the printing inks or fountain solutions were photochemically reactive.

The notification shall include a copy of such records and the summation of the rolling 52-week emissions in tons/yr OC and shall be sent to the City of Toledo Division of Environmental Services within 30 days following the end of the calendar quarter.

D. TESTING REQUIREMENTS

1. Compliance with the following emission limitations shall be determined in accordance with the

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following method(s):

a. Emission Limitation

Employ only non-photochemically reactive materials.

Applicable Compliance Method

Exclusion of materials meeting the definition in OAC 3745-21-01(C)(5).

b. Emission Limitation

1.57 lbs/hr of OC

Applicable Compliance Method

Compliance shall be demonstrated through the recordkeeping requirements of Additional Special Term and Condition II.B.. USEPA Method 24 and 24A shall be used to demonstrate the OC content.

c. Emission Limitation

6.88 tons/yr OC

Applicable Compliance Method

Compliance shall be demonstrated through the recordkeeping requirements of Additional Special Term and Condition II.B.1.e..

E. MISCELLANEOUS REQUIREMENTS

1. This permit allows the use of the materials specified by the permittee in the application. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the 2-butoxyethanol and petroleum distillate emission limitations specified in this permit were established in accordance with the Ohio EPA's "Air

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Toxics Policy" and are based on both the material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the Screen3 model and a comparison of the predicted 1 hour maximum ground-level concentration to the MAGLC. The following summarizes the results of the modeling for each pollutant:

Pollutant: Petroleum Distillate

TLV (ug/m3):525,000

Maximum Hourly Emission Rate (lbs/hr):0.845

**Predicted 1 Hour Maximum Ground-Level
Concentration (ug/m3):586.3**

**Maximum Acceptable Ground-Level Concentration
(MAGLC) (ug/m3):12,500**

Pollutant: 2-butoxyethanol

TLV (ug/m3):121,000

Maximum Hourly Emission Rate (lbs/hr):0.012

**Predicted 1 Hour Maximum Ground-Level
Concentration (ug/m3):8.25**

**Maximum Acceptable Ground-Level Concentration
(MAGLC) (ug/m3):2,880**

2. Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval from the Toledo Environmental Services Division are required, including the possible issuance of modifications to this PTI and the operating permit:
 - a. any changes in the composition of the 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

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Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified above;

- b. any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC specified in the above table;
 - c. a reduction in the TLV by the ACGIH for any of the materials that, at the maximum hourly emission rate specified in the above table, would result in an exceedance of the new MAGLC;
 - d. any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01; and,
 - e. any change in the composition of the materials, or use of new materials, that would result in the emission of any of the exempted organic compounds included in the definition of "VOC" [OAC rule 3745-21-01(B)(6)].
3. The permittee shall determine all materials that are classified as Hazardous Air Pollutants (HAPs) as defined in the Clean Air Act Amendments of 1990, Title III, Section 112(b).
 4. The permittee shall calculate on a rolling 12-month basis the amount of individual HAPs and the total amount of HAPs in tons/yr for all sources located at this location.
 5. The permittee shall be limited to 10 tons/yr of an individual HAP and 25 tons/yr total HAPs based on a rolling 12-month basis for all sources located at this location. If these limits are exceeded, the permittee shall either apply for a Title V operating permit or apply for a Federally Enforceable State Operating Permit (FESOP) within 30 days after the exceedance.