

Facility ID: 1409010838 Issuance type: Final State Permit To Operate

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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: 1409010838 Emissions Unit ID: R005 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>
Lithographic Printing Press #150	OAC rule 3745-31-05 (PTI 14-4234)	See Term A.2.a, A.2.b, A.2.c, A.2.d and A.2.f
	OAC Rule 3745-21-07(G)(2)	See Term A.2.b.
	OAC Rule 3745-17-07(A)	See Term A.2.e
	OAC Rule 3745-17-08	Less stringent than the BAT emission limit in A.2.d.

2. Additional Terms and Conditions

- (a) The organic compound (OC) emissions from this emissions unit shall not exceed 88.5 pounds per hour when no photochemically reactive materials (PRMs), as defined in OAC 3745-21-01(C)(5), are employed in this emissions unit.

The OC emissions from this emissions unit shall not exceed 8 pounds per hour and 40 pounds per day on any day when a PRM is employed in this emissions unit.

The OC emissions from this emissions unit shall not exceed 28.1 tons per year as a rolling, twelve-month total.

The particulate/PM10 emissions from this emissions unit shall not exceed 6 pounds per month and 72 pounds per year. These emissions limits have been calculated based on the maximum capacity of the emissions unit and 24 hours per day of operation.

The visible particulate emissions from this emissions unit shall not exceed twenty percent opacity as a six-minute average, except as specified by rule.

The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 10 TPY for any single HAP and 25 TPY for any combination of HAPs. Compliance with the above limitations shall be determined on a rolling, 12-month summation.

B. Operational Restrictions

1. The following operational limitations shall apply to this emissions unit:
 - a. The ink usage shall not exceed 124,480* pounds per year as a rolling, twelve-month total.
 - b. The OC content of inks shall not exceed 15%* by weight as a rolling, twelve-month weighted average.
 - c. The coating usage shall not exceed 373,440* pounds per year as a rolling, twelve-month total.
 - d. The OC content of coatings shall not exceed 5.4%* by weight, as a rolling, twelve-month weighted average.
 - e. The fountain solution usage shall not exceed 58,950* pounds per year as a rolling, twelve-month total.
 - f. The OC content of fountain solution shall not exceed 8.2%* by weight as a rolling, twelve-month weighted average.
 - g. The cleanup material usage shall not exceed 30,200* pounds per year as a rolling, twelve-month total.

*The usage rate and OC content limitation may be exceeded provided the annual OC emissions limit is not exceeded. However, the following shall not be exceeded at any time:

 - i The maximum OC content of inks shall not exceed 30% by weight.
 - ii The maximum OC content of coatings shall not exceed 20% by weight.
 - iii The maximum OC content of fountain solution shall not exceed 35% by weight.
2. The permittee shall operate the existing chiller system on this emissions unit to refrigerate the fountain solution while the press is running production.
3. The permittee shall store all spent OC containing cleaning materials and cleaning rags in covered containers.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records which list the following information for this emissions unit:
 - a. The company identification of each ink, coating, fountain solution and cleanup material.
 - b. The amount of each ink, coating, fountain solution and cleanup material employed in pounds.
 - c. The weight percent OC content of each ink, coating and fountain solution.
 - d. The monthly weighted average OC content (in percent by wt.) of each ink, coating and fountain solution.
 - e. The monthly OC emissions in pounds or tons from this emissions units based on a 95% organic solvent retention for inks and 100% organic solvent evaporation for coatings, fountain solution and cleanup material.*
 - f. The rolling, twelve-month total usage for ink, coating, fountain solution and cleanup material in pounds per year.
 - g. The rolling, twelve-month weighted average OC content (in percent by wt.) for inks, coatings and fountain solution.
 - h. The rolling, twelve-month total OC emissions, in tons per year.

*If the permittee sends waste collected for waste disposal, the permittee may take a credit for that in emissions calculations provided that the permittee keeps adequate records to calculate the total amount of OCs in the waste disposed off site from this emissions unit.
2. The permittee shall collect and record the following information for each day for the coating operation:
 - a. The company identification for each coating, ink, fountain solution and photochemically reactive cleanup material employed.
 - b. The number of gallons of each coating, ink, fountain solution and photochemically reactive cleanup material employed.
 - c. The OC content of each coating, ink, fountain solution and photochemically reactive cleanup material, in pounds per gallon.
 - d. For each day during which a photochemically reactive material is employed, the total OC emissions from all coatings, inks, fountain solutions and photochemically reactive cleanup materials, in pounds per day.
 - e. For each day during which a photochemically reactive material is employed, the total number of hours the emissions unit was in operation.
 - f. For each day during which a photochemically reactive material is employed, the average hourly OC emission rate for all coatings, inks, fountain solutions and photochemically reactive cleanup materials, i.e., (d)/(e), in pounds per hour (average).
3. The permittee shall collect and record the following information each month for all emissions units at the facility:
 - a. The name and identification number of each ink, coating, fountain solution, cleanup material and adhesive.
 - b. The individual HAP content for each HAP of each ink, coating, fountain solution, cleanup material and adhesive, in weight percent of individual HAP.
 - c. The total combined HAP content of each ink, coating, fountain solution, cleanup material and adhesive, in weight percent of combined HAPs (the sum of all the individual HAP contents from (b)).
 - d. The number of pounds of each ink, coating, fountain solution, cleanup material and adhesive employed.
 - e. The total individual HAP emissions for each HAP from all inks, coatings, fountain solutions, cleanup materials and adhesives employed, in pounds or tons per month (for each HAP, the sum of (b) times (d) for each ink, coating, fountain solution, cleanup material and adhesive).
 - f. The total combined HAP emissions from all inks, coatings, fountain solutions, cleanup materials and adhesives employed, in pounds or tons per month (the sum of (c) times (d) for each ink, coating, fountain solution, cleanup material and adhesive).
 - g. The rolling, twelve-month total individual HAP emissions for each HAP from all inks, coatings, fountain solutions, cleanup materials and adhesives employed, in pounds or tons.
 - h. The rolling, twelve-month total combined HAPs from all inks, coatings, fountain solutions, cleanup materials and adhesives employed, in pounds or tons.

A listing of the Hazardous Air Pollutants (HAPs) can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on an emissions unit - by - emissions unit basis.

D. Reporting Requirements

1. The permittee shall submit semi-annual reports which include the following information:
 - a. The rolling, twelve-month total usage for all inks, coatings, fountain solutions and cleanup materials in pounds per year, for each month.
 - b. The rolling, twelve-month weighted average OC content (in percent by wt.) for inks, coatings and fountain solution, for each month.
 - c. The rolling, twelve-month total OC emissions, in tons per year, for each month.

These reports shall be submitted by August 15 and February 15 of each year and shall cover the previous six calendar months (January to June and July to December, respectively).
2. The permittee shall notify the Director of any daily or monthly record showing that this emissions unit has exceeded the emission limitations and/or the operational limitations outlined in this permit. A copy of such record shall be sent to the Director within 30 days after the exceedance occurs.
3. The permittee shall notify the Director of any exceedance of the HAP emissions limitations set forth in this permit. The permittee shall submit annual reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance. The annual reports also shall specify the single HAP and combined HAP emissions for the previous calendar year. These reports shall be submitted by January 31 of each year. If no exceedances occurred during the reporting period, then a report is required stating so.

E. Testing Requirements

1. Formulation data or USEPA method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the OC contents of the inks and coatings.
2. Compliance with the visible emissions limitations shall be determined by Method 9, 40 CFR Part 60, Appendix A.
3. Compliance with the usage and emission limitations outlined in this permit shall be demonstrated by the record keeping requirements outlined in Term C.1, C.2 and C.3.

F. Miscellaneous Requirements

1. None