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: R007 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
lithographic printing press #175	OAC rule 3745-31-05 (PTI 14-4234)	91.6 lbs of organic compounds (OC)/hr* when not using photochemically reactive materials (PRMs); 20.1 TPY of OC as a rolling, 12-month summation 6 lbs of particulate emissions (PE)/month*, 6 lbs of particulate materials less than 10 micron (PM-10)/month*; 72 lbs of PE/yr, and 72 lbs of PM-10/yr *The hourly OC and the monthly PE and PM-10 emission limitations are based upon the maximum production/application rate and, therefore, no records are required to demonstrate compliance. See section A.2. below.
	OAC rule 3745-21-07(G)(2)	8 lbs of OC/hr and 40 lbs of OC/day when using any PRMs in any day
	OAC rule 3745-17-07(B)(1)	Visible particulate emission of fugitive dust shall not exceed 20% opacity, as a 3-minute average, except as specified by rule.
	OAC rule 3745-17-08(B)	The control measures established by this rule are equal to or less stringent than those established pursuant to OAC rule 3745-31-05.

2. **Additional Terms and Conditions**

   (a) The actual emissions of hazardous air pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.
   The permittee shall minimize or eliminate visible particulate emissions of fugitive dust from the over spray of corn starch powder by capturing and venting such dust to filters.

B. **Operational Restrictions**

1. The following operational restrictions shall apply to this emissions unit:

   a. The ink usage shall not exceed 88,900 pounds per year as a rolling, 12-month summation.*
   b. The OC content of inks shall not exceed 15% by weight, as a rolling, 12-month weighted average.*
   c. The coating usage shall not exceed 266,740 pounds per year as a rolling, 12-month summation.*
   d. The OC content of coatings shall not exceed 5.4% by weight, as a rolling, 12-month weighted average.*
   e. The fountain solution usage shall not exceed 42,110 pounds per year as a rolling, 12-month summation.*
   f. The OC content of fountain solution shall not exceed 8.2% by weight, as a rolling, 12-month weighted average.*
   g. The cleanup material usage shall not exceed 21,580 pounds per year as a rolling, 12-month summation.*

   *The usage rate and OC content restrictions 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 each ink shall not exceed 30% by weight.
ii. The maximum OC content of each coating shall not exceed 20% by weight.
iii. The maximum OC content of each fountain solution shall not exceed 35% by weight.

2. The permittee shall operate the existing chiller system to refrigerate the fountain solution while the press is running in 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 that 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 material type: ink, coating and fountain solution [{summation of (b x c/100) for each material type} divided by the summation of (b) for each material type multiplied by 100%].
e. The monthly OC emissions, in pounds, from this emissions unit based on a 95% organic solvent retention for inks and 100% organic solvent evaporation for coatings, fountain solution and cleanup material {summation of [(b x c) for each coating, fountain solution, and cleanup material] plus summation of [(b x c x 0.05) for each ink]}.*
f. The updated rolling, 12-month summation of usage for each material type: ink, coating, fountain solution and cleanup material, in pounds per year.
g. The updated rolling, 12-month weighted average OC content (in percent by wt.) for each material type: inks, coatings and fountain solution.
h. The updated rolling, 12-month summation of OC emissions, in tons per year.

*If the permittee collects waste and sends waste off site for waste disposal, the permittee may take a credit for that in emissions calculations provided that the permittee keeps adequate records to show the calculation of 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 any day that a PRM is used in this emissions unit:

a. The company identification for each ink, coating, fountain solution and cleanup material employed.
b. Documentation on whether or not each ink, coating, fountain solution and cleanup material is a PRM.
c. The number of pounds of each ink, coating, fountain solution and cleanup material employed.
d. The weight percent OC content of each ink, coating, fountain solution and cleanup material.
e. The OC emission rate for each ink, coating, fountain solution and cleanup material, in pounds per day; based on a 95% organic solvent retention for inks and 100% organic solvent evaporation for coatings, fountain solution and cleanup material {(c x d) for each coating, fountain solution, and cleanup material and (c x d x 0.05) for each ink}. If the permittee collects waste and sends waste off site for waste disposal, the permittee may take a credit for that in emissions calculations provided that the permittee keeps adequate records to show the calculation of the total amount of OCs in the waste disposed off site from this emissions unit.
f. The total OC emission rate from all inks, coatings, fountain solutions and cleanup materials, in pounds per day (summation of e for all inks, coatings, fountain solutions and cleanup materials);
g. The total number of hours the emissions unit was in operation.
h. The average hourly OC emission rate for all ink, coating, fountain solution and cleanup materials, i.e., (f)/(g), in pounds per hour.

[Note: The information must be for the inks, coatings and fountain solution, as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is contained in OAC rule 3745-21-01(C)(5).]

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 ink, coating, fountain solution, cleanup material, and adhesive employed, in pounds per month (for each HAP, the sum of (b x d) for each coating, fountain solution, cleanup material, and adhesive, plus the sum of {(b x d) x 0.05} for each ink).
f. The total combined HAP emissions from all ink, coating, fountain solution, cleanup material, and adhesive employed, in pounds per month (the sum of (c x d) for each coating, fountain solution, cleanup material, and adhesive plus the sum of {(c x d) x 0.05} for each ink).
g. The updated rolling, 12-month summation of the total individual HAP emissions for each HAP from all ink, coating, fountain solution, cleanup material, and adhesive employed, in tons per year.
h. The updated rolling, 12-month summation of the total combined HAPs from all ink, coating, fountain solution, cleanup material, and adhesive employed, in tons per year.
A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA District 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 annual reports that include the following information for each calander year:

a. The updated rolling, 12-month summation of usage for inks, coatings, fountain solutions and cleanup materials, in pounds per year.
b. The updated rolling, 12-month weighted average OC contents (in percent by wt.) for inks, coatings and fountain solution.
c. The updated rolling, 12-month summation of OC emissions, in tons per year.

These reports shall be submitted by February 15 of each year and shall cover the previous 12 calendar months (January to December).

2. The permittee shall notify the Hamilton County Department of Environmental Services of any record showing that this emissions unit exceeded any emission limitation (i.e., 8 lbs of OC/hr or 40 lbs of OC/day when using PRMs during any day, the 10 TPY limitation for any single HAP or the 25 TPY limitation for any combination of HAPs, as a rolling, 12-month summation) or operational restriction (i.e., maximum OC content or usage for any ink, coating, or fountain solution) specified in this permit. A copy of such record and a report on the corrective action taken to achieve compliance shall be sent to the Hamilton County Department of Environmental Services within 30 days after the exceedance occurs.

3. The permittee shall submit to the Hamilton County Department of Environmental Services annual reports specifying 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. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:

   a. Emission Limitation:
   91.6 lbs of OC/hr when not using PRMs during any day

   Applicable Compliance Method:
   Compliance shall be determined by the sum of the following multiplications: multiplying the maximum OC content (weight fraction) of any ink by the maximum application rate (lbs/hr) of the ink and by 0.05, plus multiplying the maximum OC content (weight fraction) of any coating by the maximum application rate (lbs/hr) of the coating plus multiplying the maximum OC content (weight fraction) of any fountain solution by the maximum application rate (lbs/hr) of the fountain solution.

   b. Emission Limitation:
   8 lbs of OC/hr when using any PRMs in any day

   Applicable Compliance Method:
   Compliance shall be determined by using the information collected pursuant to C.2.h.

   c. Emission Limitation:
   40 lbs of OC/day when using any PRMs in any day

   Applicable Compliance Method:
   Compliance shall be determined by using the information collected pursuant to C.2.f.

   d. Emission Limitation:
   20.1 TPY of OC

   Applicable Compliance Method:
   Compliance shall be determined by using the information collected pursuant to C.1.h.

   e. Emission Limitation:
   20% opacity, as a 3-minute average

   Applicable Compliance Method:
   Compliance with the visible emission limitation shall be determined in accordance with the method specified in OAC rule 3745-17-03(B)(3).

   f. Emission Limitation:
   72 lbs of PE/yr and 72 lbs of PM-10/yr

   Applicable Compliance Method:
   Compliance with this limitation is ensured if compliance with the monthly PE and PM-10 emission limitations are maintained.

2. Compliance with the OC content limitations in Section B.1 of these terms and conditions shall be determined in accordance with the following methods:

   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, fountain solutions, and coatings.

3. Compliance with the HAPs emission limitations in Section A.2.a shall be determined by the record keeping in Section C.3.

4. Compliance with the usage limitations in Section B.1 shall be determined by the record keeping in Section C.1.

5. If required, compliance with the 6 lbs of PE/month and 6 lbs of PM-10/month limitations shall be determined by testing pursuant to the appropriate test method specified in 40 CFR, Part 60, Appendix A and then multiplying the resulting lbs/hr values by the maximum hours of operation during any month.

F. **Miscellaneous Requirements**

1. None