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Facility Name: **Paxar Corp - Paxar Graphics Group**

Application Number: **08-3801**

Date: **September 16, 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.

### **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

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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 &amp; 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 **Paxar Corp - Paxar Graphics Group** located in **Montgomery** 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.

litho-graphic  
printing press w/IR  
drying device

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>
K001	5-color Heidel-berg sheetfed offset litho-graphic printing press	*	3745-31-05     3745-21-07 (G) (2)
K002	6-color Heidel-berg sheetfed offset litho-graphic printing press w/IR drying device	*	3745-31-05     3745-21-07 (G) (2)
K003	6-color Man Roland sheetfed offset	*	3745-31-05

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
3745-21-07 (G) (2)	Permit Allowable Mass Emissions and/or Control/Usage Requirements	1.5 lbs/hr, 36.0 lbs/day, 5.6 TPY OC, including cleanup		
		**		
		1.63 lbs/hr, 40 lbs/day, 7.3 TPY OC, including cleanup		
		**		
		1.67 lbs/hr, 40.0 lbs/day, 7.3 TPY OC, including cleanup		
		**		

\* BAT has been determined to be in compliance with the applicable OAC rules and specified allowable emission rates;

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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recordkeeping and reporting.

\*\* The limit based on this rule is less stringent than that established pursuant to OAC 3745-31-05.

#### SUMMARY

#### TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
Organic Compounds	20.2

#### REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Regional Air Pollution Control Agency, 451 West Third Street, P.O. Box 972, Dayton, Ohio 45422** .

#### 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.

#### ADDITIONAL SPECIAL TERMS AND CONDITIONS

##### A. Additional Terms and Conditions

1. The pounds/hour allowable emission rates were established for PTI purposes to reflect the potential to emit for each emissions unit. Therefore it is not necessary to develop recordkeeping and/or reporting requirements to ensure compliance with these limits.

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

1. The permittee shall collect and record the following information each month for each emissions unit K001, K002, and K003:
  - a. the company identification for each ink, fountain solution, and cleanup material employed;
  - b. the number of gallons of each ink, fountain solution, and cleanup material employed;
  - c. the number of gallons of each ink, fountain solution, and cleanup material recovered;
  - d. the organic compound content of each ink, fountain solution, and cleanup material, in pounds per gallon.
  - e. the total organic compound emission rate for all inks, fountain solution, and cleanup materials (taking into account recovered materials and the 95% retention rate of the inks to the substrate, i.e. 5% emission rate in accordance with OEPA Engineering Guide #68), in pounds and tons per month.
  - f. the total number of days the emission unit was in operation; and,
  - g. the average daily organic emission rate for all inks, fountain solution, and cleanup materials, i.e., (e)/(f), in pounds per day (average).
2. Each record of any monitoring data, testing data, and support information required pursuant to this permit

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shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Such records may be maintained in computerized form.

**C. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which include the following information:

**for K001:**

- a. an identification of each month during which the average daily organic compound emissions from the inks, fountain solution, and cleanup materials exceeded 36.0 pounds per day, and the actual average daily organic compound emissions for each such month; and

**for K002 and K003:**

- b. an identification of each month during which the average daily organic compound emissions from the inks, fountain solution, and cleanup materials exceeded 40.0 pounds per day, and the actual average daily organic compound emissions for each such month.

2. The permittee shall submit required reports in the following manner:

- a. reports of any required monitoring and/or recordkeeping information shall be submitted to the Regional Air Pollution Control Agency;

- b. except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been

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detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Regional Air Pollution Control Agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

**D. Compliance Methodologies**

1. Compliance with the emission limitations in this permit shall be determined in accordance with the following method(s):

**for K001:**

- a. Emission Limitation -  
1.5 pounds/hour organic compounds, including cleanup

Applicable Compliance Method -  
Compliance shall be determined by totaling the following products:

- i. Inks:

The maximum hourly ink usage is multiplied by the maximum OC content of all inks employed. This product is then multiplied by a web solvent retention of 95% (1 - 0.95), in accordance with OEPA Engineering Guide #68 issued July 7, 1997.

- ii. Fountain Solutions:

The maximum hourly fountain solution usage is

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multiplied by the maximum OC content of all fountain solutions employed.

iii. Cleanup Materials:

The maximum hourly cleanup material usage is multiplied by the maximum OC content of all the cleanup materials employed.

The lb/hr emissions rate for the inks, fountain solutions and cleanup materials are summed for the total lbs OC/hr. This is how the 1.5 lbs OC/hr limitation was developed.

- b. Emission Limitation -  
36.0 pounds/day organic compounds, including cleanup

Applicable Compliance Determination -  
Compliance shall be based upon the recordkeeping as specified in Additional Special Term and Condition B.

- c. Emission Limitation -  
5.6 TPY organic compounds, including cleanup

Applicable Compliance Method -  
Compliance shall be based upon the recordkeeping as specified in Additional Special Term and Condition B. and shall be the sum of the 12 monthly organic compound emission rates for the calendar year divided by 2,000 pounds per ton.

**for K002:**

- d. Emission Limitation -  
1.63 pounds/hour organic compounds, including cleanup

Applicable Compliance Method -  
Compliance shall be determined by totaling the following products:

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i. Inks:

The maximum hourly ink usage is multiplied by the maximum OC content of all inks employed. This product is then multiplied by a web solvent retention of 95% (1 - 0.95), in accordance with OEPA Engineering Guide #68 issued July 7, 1997.

ii. Fountain Solutions:

The maximum hourly fountain solution usage is multiplied by the maximum OC content of all fountain solutions employed.

iii. Cleanup Materials:

The maximum hourly cleanup material usage is multiplied by the maximum OC content of all the cleanup materials employed.

The lbs/hr emissions rate for the inks, fountain solutions and cleanup materials are summed for the total lbs OC/hr. This is how the 1.63 lbs OC/hr limitation was developed.

- e. Emission Limitation -  
40 pounds/day organic compounds, including cleanup

Applicable Compliance Method -  
Compliance shall be based upon the recordkeeping as specified in Additional Special Term and Condition B.

- f. Emission Limitation -  
7.3 TPY organic compounds, including cleanup

Applicable Compliance Method-  
Compliance shall be based upon the recordkeeping as specified in Additional Special Term and Condition B. and shall be the sum of the 12 monthly organic compound emission rates for the calendar year divided by 2,000 pounds per ton.

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**for K003:**

- g. Emission Limitation -  
1.67 pounds/hour organic compounds, including cleanup

Applicable Compliance Method -  
Compliance shall be determined by totalling the following products:

- i. Inks:

The maximum hourly ink usage is multiplied by the maximum OC content of all inks employed. This product is then multiplied by a web solvent retention of 95% (1 - 0.95), in accordance with OEPA Engineering Guide #68 issued July 7, 1997.

- ii. Fountain Solutions:

The maximum hourly fountain solution usage is multiplied by the maximum OC content of all fountain solutions employed.

- iii. Cleanup Materials:

The maximum hourly cleanup material usage is multiplied by the maximum OC content of all the cleanup materials employed.

The lbs/hr emissions rate for the inks, fountain solutions and cleanup materials are summed for the total lbs OC/hr. This is how the 1.67 lbs OC/hr limitation was developed.

- h. Emission Limitation -  
40.0 pounds/day organic compounds, including cleanup

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Applicable Compliance Method -  
Compliance shall be based upon the recordkeeping as specified in Additional Special Term and Condition B.

i. Emission Limitation -  
7.3 TPY organic compounds, including cleanup

Applicable Compliance Method -  
Compliance shall be based upon the recordkeeping as specified in Additional Special Term and Condition B. and shall be the sum of the 12 monthly organic compound emission rates for the calendar year divided by 2,000 pounds per ton.