

Facility ID: 1431153442 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.

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

Facility ID: 1431153442 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>
4-color offset press	OAC rule 3745-31-05 (PTI 14-4647)	The organic compound (OC) emissions, including OC emissions from inks, roller wash, and blanket wash (cleanup material), from this emissions unit shall not exceed 27.2 pounds/day and 4.99 tons/year (TPY).
	OAC rule 3745-21-07(G)(2)	See Term and Condition A.2. The emission limits established by this rule are less stringent than those established by OAC rule 3745-31-05.

2. **Additional Terms and Conditions**
  - (a) The permittee shall not allow the organic compound (OC) content of each ink to exceed 4 percent by weight, as applied.  
The daily and annual emission limitations specified in this permit are based upon the emissions unit's potential to emit or its maximum hourly production/application rate at 24 hours per day. Therefore, no daily or annual records are required to demonstrate compliance with these limits.

**B. Operational Restrictions**

1. Material usages shall not exceed the following limits:
  - . Material Usages (lbs/yr)
  - a. Ink 349,962
  - b. Roller wash 12,300.5
  - c. Blanket wash 6,150.25
2. The use of any photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] is prohibited.
3. To ensure that the evaporative OC loss from the hand cleanup process does not exceed more than 50% (by weight) from solvents having a vapor pressure of 10 mmHg (0.19 psia) or lower at 20 degrees Celsius (68 degrees Fahrenheit), all rags utilized in the cleanup process shall be stored in containers with tight-fitting covers.

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

1. The permittee shall collect and record the following information each month for this emissions unit:
  - a. the company identification number of each ink, roller wash, and blanket wash employed;
  - b. the OC content of each ink employed, in percent by weight;
  - c. the OC content of each roller wash and blanket wash employed, in percent by weight;
  - d. the number of pounds of each ink employed;
  - e. the number of pounds of each roller wash and blanket wash employed;

f. a record of the amount of roller wash recovered which includes the minimum recovery rate in percent by weight and the minimum solids content in percent by weight; and

g. a record of each liquid organic material employed in this emissions unit indicating whether or not the liquid organic material is a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).

**D. Reporting Requirements**

1. The permittee shall submit deviation reports which identify all exceedances of the OC content limitation in Term and Condition A.2.a. If no exceedances occurred during the reporting period, then the permittee shall submit a report stating so.
2. The permittee shall submit annual reports which specify the total usages, in pounds, of inks, blanket wash and roller wash. These reports shall be submitted by February 15 of each year and shall cover the previous 12 calendar months.
3. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each month during which any photochemically reactive material (as defined in OAC rule 3745-21-01(C)(5)) was employed. This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of material(s) emitted for each day of use.

**E. Testing Requirements**

1. Compliance with the emission limitations and material content and usage restrictions in Sections A. and B. of these terms and conditions shall be determined in accordance with the following methods:

a. Materials Content and Usage Restrictions:

Ink: 4 percent OC by weight and 349,962 pounds/year maximum

Roller wash and Blanket wash: 12,300.5 and 6150.25 pounds/year maximum, respectively.

Applicable Compliance Method:

Compliance with the percent by weight OC content and the maximum annual usage restrictions shall be based upon the record keeping performed in accordance with Section C.1 of these Terms and Conditions.

Formulation data or USEPA Method 24 shall be used to determine the OC contents of the ink, roller wash, and blanket wash.

b. Daily OC Emission Limitation:

27.2 lbs of OC/day

Applicable Compliance Method:

Compliance with the daily OC emission limitation shall be determined by summing: (1) the product of the maximum OC content of the ink (percent by weight) times the maximum ink usage rate in pounds per day and times the ink retention factor of 0.05 lb OC emission/lb OC (Ohio EPA Engineering Guide # 68), (2) the product of the maximum OC content of the roller wash (percent by weight) times the maximum roller wash usage rate in pounds per day, and (3) the product of the maximum OC content of the blanket wash (percent by weight) times the maximum blanket wash usage rate in pounds per day.

c. Annual OC Emission Limitation:

4.99 tons of OC/year

Applicable Compliance Method:

Compliance with the annual OC emission limitation is ensured by compliance with the daily OC emission limitation.

**F. Miscellaneous Requirements**

1. This permit allows the use of the coatings and cleanup materials specified by the permittee in the application for PTI number 14-4647. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the daily organic compound emission limitation specified in this permit was established in accordance with the Ohio EPA's "Air Toxics Policy" and is based on both the coating and cleanup 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 Screen 3 model and a comparison of the predicted 1-hour maximum ground-level concentration to the Maximum Allowable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: trimethyl benzene

TLV (mg/m3): 123

Maximum Hourly Emission Rate (lbs/hr): 2.72

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 953

Maximum Acceptable Ground-Level Concentration (ug/m3): 2929

Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval from the Hamilton County Department of Environmental Services are required, including the possible issuance of modifications to PTI number 14-4647 and the operating permit:

a. Any changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup 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 in the above table.

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. Any change to the emissions unit or its method of operation that would either require an increase in the daily emission limitation established by this permit or would otherwise be considered a "modification" as defined in

OAC rule 3745-31-01.