

Facility ID: 1431330487 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: 1431330487 Emissions Unit ID: R008 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>
Offset Lithographic Press	PTI 14-3771	232.9 LBS.OC/DAY, 17.7 TPY OC
-	OAC 3745-17-07(A)	See T&C A.2.2.a and A.2.2.b Less than or equal to 20 percent opacity, as a 6-minute average, from the incinerator stack, except by rule.
-	OAC 3745-21-07(G)	Exempted based on the prohibited use of photochemically reactive materials. See T&C A.2.1.a. See T&C B.1-B.5.

2. **Additional Terms and Conditions**
 - (a) The restrictions as outlined in this permit are limits which will ensure the total potential organic compound emissions from this emissions unit will not exceed 17.7 TPY. Due to the seasonal production of this facility, compliance will be based on a 12-month rolling summation. This facility shall maintain and operate a Thermal Incinerator capable of maintaining an OC control efficiency (i.e. destruction efficiency) which is at least 90% by weight.

B. Operational Restrictions

1. The use of photochemically reactive materials as defined in OAC rule 3745-21-01(C)(5) is prohibited. This emissions unit shall not employ hazardous air pollutants (HAP) as listed in Section 112(b) of the Clean Air Act in excess of 10 tons per year for any one HAP or 25 tons per year of any combination of the above listed HAP's.
 - The average temperature of the exhaust gases from the thermal incinerator, for any 3-hour block of time, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emissions test that demonstrated the emissions unit was in compliance.
 - The maximum annual ink usage for this emissions unit shall not exceed 45,000 gallons, based upon a rolling 12-month summation.
 - The maximum annual cleanup usage for this emissions unit shall not exceed 3,500 gallons, based upon a rolling 12-month summation.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month:
 - i. The name and identification number of each ink or cleanup employed.
 - ii. The OC content of each ink, as applied, in pounds per gallon.
 - iii. The volume, in gallons, of each ink or cleanup employed.
 - iv. The total 12-month rolling summation, in gallons, of all of the ink and cleanup employed.
 - v. The total 12-month rolling summation of OC emissions (including cleanup emissions) as of the last day of each calendar month, in pounds.
The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and

records the temperature of the exhaust gases from the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within + 1 percent of the temperature being measured or + 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each day:

- i. The average temperature of the exhaust gases from the thermal incinerator during each of the 8 3-hour blocks of time during the day.
- ii. A log or record of operating time for the capture (collection system, control device, monitoring equipment, and the associated emissions unit).

D. Reporting Requirements

1. The permittee shall submit quarterly reports to the Ohio EPA field office which summarize the information required by T&C C.1. during the previous three calendar months. The reports shall be submitted by February 15, May 15, August 15, and November 15 of each year and shall cover the previous three calendar months (October through December, January through March, April through June, and July through September, respectively)
2. The permittee shall submit temperature deviation (excursion) reports that identify all 3-hour blocks of time during which the average temperature of the exhaust gases from the thermal incinerator does not comply with the temperature limitation specified in T&C B.3. Also include in these reports, the reason for the excursion and the corrective action which has or will be taken to prevent similar excursions in the future. If no excursions occurred during the reporting period, then a report is required stating so.

These reports shall be submitted by February 15 and August 15 of each year and shall cover the previous six calendar months (July through December and January through June, respectively).

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):
 - i. Compliance with the visible particulate emissions from the incinerator stack shall be demonstrated by the methods outlined in OAC 3745-17-03(B)(1).
 - ii. Compliance with the organic compound emission limitations shall be demonstrated by the usage records required by T&C C.1.
 - iii. Compliance with the OC content shall be demonstrated by 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.

F. Miscellaneous Requirements

None