

Facility ID: 1431420687 Issuance type: Title V Draft Permit

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 III" and before "I. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

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## Part II - Specific Facility Terms and Conditions

### a State and Federally Enforceable Section

1. None

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### b State Only Enforceable Section

1. The following insignificant emissions units are located at this facility:

B003 10.5 MMBtu/hr natural gas fired boiler  
P007 Paper Scrap Recovery System # 1  
P008 Paper Scrap Recovery System # 2  
P009 Paper Scrap Recovery System # 3  
T001 10,000 Gallon Storage Tank

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emissions limitations and/or control requirements contained within a Permit to Install for the emissions unit.

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**Part III - Terms and Conditions for Emissions Units**

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Facility ID: 1431420687 Emissions Unit ID: B001 Issuance type: Title V Draft Permit

**A. State and Federally Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

**I. 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>
20.92 MMBtu/hr natural gas and #2 oil fired boiler	OAC rule 3745-17-07(A)(1)	Visible emissions from this emissions unit shall not exceed 20% opacity as a six-minute average, except as specified by rule.
	OAC rule 3745-17-10(B)(1)	Particulate emissions from this emissions unit shall not exceed 0.020 pound per MMBtu of actual heat input.
	OAC rule 3745-18-06(C)	Sulfur dioxide emissions from this emissions unit shall not exceed 1.6 pounds per MMBtu of actual heat input.

**2. Additional Terms and Conditions**

- (a) None

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**II. Operational Restrictions**

1. The quality of the oil burned in this emissions unit on an "as received" basis shall meet the following specification:  
  
A combination of the heat content and sulfur content which is sufficient to comply with the allowable sulfur dioxide emission limitation of 1.6 pounds of sulfur dioxide per MMBtu actual heat input.
2. The permittee shall burn only natural gas and/or number two fuel oil in this emissions unit.

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

1. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content (percent by weight) and heat content (Btu per gallon), and the sulfur dioxide emissions in lbs per MMBtu actual heat input.
2. The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with the following ASTM methods: ASTM method D4294, ASTM method D240, or ASTM method 6010 for sulfur content; and ASTM method D240 for heat content. Alternative, equivalent methods may be used upon written approval by the appropriate Ohio EPA District Office or Hamilton County Department of Environmental Services.
3. For each day during which the permittee burns a fuel other than natural gas and/or number two fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

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IV. **Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify any oil shipment, received for burning in this emissions unit, which exceeded the sulfur dioxide emission limit of 1.6 pounds per MMBtu actual heat input.  
  
For each shipment of oil that exceeds the sulfur dioxide emission limitation, the permittee also shall submit the permittee's or oil supplier's analyses which document the sulfur content (percent), heat content (Btu/gallon), and quantity of oil received.
2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or number two fuel oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

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V. **Testing Requirements**

1. Compliance with the emission limits for visible emissions as established in OAC rule 3745-17-07(A)(1) shall be demonstrated by the methods outlined in OAC rule 3745-17-03(B)(1).
2. Compliance with the emission limit for particulate matter, as established in OAC rule 3745-17-10(B)(1), shall be demonstrated by the emission factors from AP-42 (External Combustion Sources).  
  
If required, compliance with the particulate emissions limit shall be demonstrated through testing performed in accordance with 40 CFR Part 60, Appendix A, Method 5.
3. Compliance with the emission limit for sulfur dioxide as established in OAC rule 3745-18-06(C) shall be demonstrated using the equation specified in rule OAC 3745-18-04(G) and the analyses and recordkeeping specified in A.III.

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VI. **Miscellaneous Requirements**

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Facility ID: 1431420687 Emissions Unit ID: B001 Issuance type: Title V Draft Permit

**B. State Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **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>
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20.92 MMBtu/hr natural gas and #2 oil fired boiler		
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2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 1431420687 Emissions Unit ID: K006 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **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>
51" offset sheet-fed lithographic printing press	OAC rule 3745-31-05 (PTI 14-4646)	The total combined emissions for emissions units K006, K007, and K008 shall not exceed 83.51 tons of VOC, based on a rolling, twelve-month summation.

25.04 lbs/hr VOC\*\*

\*\* The hourly emission limitation is based upon the maximum hourly application rate at 24 hours/day. Therefore, no monitoring, record keeping, or reporting requirements are needed for this limit.

See T&C A.I.2.b.

See T&C A.I.2.a, A.I.2.c, A.I.2.d and A.II.

OAC rule 3745-21-09(II)

2. **Additional Terms and Conditions**

- a. The permittee shall not exceed the following VOC content limitations, as applied, excluding water and exempt solvents, for emissions units K006, K007, and K008:

- (a)
  - Varnish Coating 2.8 lbs VOC/gal of coating
  - Aqueous Coating 3.0 lbs VOC/gal of coating
  - Inks (except metallic) 1.2 lbs VOC/gal of coating
  - Metallic Inks 2.5 lbs VOC/gal of coating

- b. The permittee shall not exceed the following VOC content limitations, as applied, excluding water and exempt solvents, for emissions units K006, K007, and K008:
  - Dampening Solution 0.33 lb VOC/gal of coating
  - Cleanup Material 6.56 lbs VOC/gal of coating
- c. The total combined VOC emissions from the metallic inks employed in emissions units K006, K007, and K008 shall not exceed 0.258 ton during any calendar month and 2.32 tons, based on a rolling, twelve-month summation.
- d. The fountain solution employed in this emissions unit shall have a VOC content not greater than ten percent VOC (alcohol) by volume at each cooling unit.

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**II. Operational Restrictions**

- 1. The fountain solution employed in this emissions unit shall be refrigerated at each cooling unit to a temperature not to exceed sixty degrees Fahrenheit.

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

- 1. The permittee shall collect and record the following information each month for emissions units K006, K007, and K008 combined:
  - a. The name and identification of each surface coating, ink, dampening solution and cleanup material employed.
  - b. The total amount, in gallons, of each surface coating, ink, dampening solution and cleanup material employed, excluding water and exempt solvents.
  - c. The VOC content of each surface coating, ink, dampening solution and cleanup material, in pounds VOC per gallon, excluding water and exempt solvents.
  - d. The total VOC emissions [the summation of line (b) multiplied by line (c) for each listed material] from all surface coatings\*, inks, dampening solutions and cleanup materials employed, in pounds or tons.
    - \* The emissions from the surface coatings employed shall not include the amount of solvent retained in the web [ i.e., the summation of line (b) multiplied by line (c) for each surface coating, multiplied by 1- solvent retention (amount retained in the web)]
  - e. The updated rolling, twelve-month summation of the VOC emissions, (i.e., the summation of the current calendar month's emission total and the previous eleven calendar months' emissions total).
- 2. The owner or operator shall measure and record the temperature and VOC content, in percent by volume, of the fountain solution in each cooling unit on a daily basis. The VOC content of the fountain solution shall be measured using a hydrometer.
- 3. The owner or operator shall calculate and record the calendar month and rolling, twelve-month VOC emissions from the metallic inks employed in emissions units K006, K007, and K008 combined.

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**IV. Reporting Requirements**

- 1. The permittee shall submit an annual report which specifies for the previous year the total VOC emissions from emissions units K006, K007, and K008 combined. This report shall be submitted by January 30 of each year.
- 2. The permittee shall submit an annual report which specifies for the previous year the total VOC emissions from the use of metallic inks for emissions units K006, K007, and K008 combined. This report shall be submitted by January 30 of each year.
- 3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the temperature restriction of sixty degrees Fahrenheit and/or any VOC content measurement of the fountain solution that exceeds ten percent, by volume.
- 4. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the VOC content limitations specified in A.1.2.a and A.1.2.b, the calendar month limitation in A.1.2.c (0.258 ton), and the rolling, twelve-month emission limitations for VOC specified in A.1.1. (83.51 tons) and A.1.2.c (2.32 tons).

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**V. Testing Requirements**

1. Compliance with the emission limits in Sections A.I.1 and A.I.2 shall be demonstrated by the record keeping in Section A.III.
2. USEPA Method 24A shall be used to determine the VOC contents for materials employed in flexographic printing lines. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24A.
3. Compliance with the VOC content limitations shall be determined by the record keeping required in Section A.III.
4. Compliance with the VOC content and temperature limitations for the fountain solution shall be demonstrated by the monitoring required in Section A.III.

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VI. **Miscellaneous Requirements**

1. None

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**B. State Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **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>
51" offset sheet-fed lithographic printing press	OAC rule 3745-31-05 (PTI 14-4646)	

2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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

1. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
  - a. Background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.).
  - b. A copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitations specified in this permit were established using the Ohio EPA's "Air Toxic Policy" and are based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: Isopropyl Alcohol  
 TLV (ug/m3): 983,000  
 Maximum Hourly Emission Rate (lbs/hr): 27.44  
 Predicted 1-Hour Maximum Ground-Level  
 Concentration (ug/m3): 3,809  
 MAGLC (ug/m3): 23,405

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new 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. Changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height).
- c. Changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted.
- d. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. The change is not otherwise considered a "modification" under OAC Chapter 3745-31.
- b. The permittee can continue to comply with the allowable emission limitations specified in its permit to install.
- c. Prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

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**Facility ID: 1431420687 Emissions Unit ID: K007 Issuance type: Title V Draft Permit**

**A. State and Federally Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

**I. 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>
40" offset sheet-fed lithographic printing press	OAC rule 3745-31-05 (PTI 14-4646)	The total combined emissions for emissions units K006, K007, and K008 shall not exceed 83.51 tons of VOC, based on a rolling, twelve-month summation.  23.72 lbs/hr VOC**  ** The hourly emission limitation is based upon the maximum hourly application rate at 24 hours/day. Therefore, no monitoring, record keeping, or reporting requirements are needed for this limit.
	OAC rule 3745-21-09(II)	See T&C A.I.2.b. See T&C A.I.2.a, A.I.2.c, A.I.2.d and A.II.

**2. Additional Terms and Conditions**

- a. The permittee shall not exceed the following VOC content limitations, as applied, excluding water and exempt solvents, for emissions units K006, K007, and K008:
  - (a) Varnish Coating 2.8 lbs VOC/gal of coating  
Aqueous Coating 3.0 lbs VOC/gal of coating  
Inks (except metallic) 1.2 lbs VOC/gal of coating  
Metallic Inks 2.5 lbs VOC/gal of coating
- b. The permittee shall not exceed the following VOC content limitations, as applied, excluding water and exempt solvents, for emissions units K006, K007, and K008:
  - Dampening Solution 0.33 lb VOC/gal of coating
  - Cleanup Material 6.56 lbs VOC/gal of coating
- c. The total combined VOC emissions from the metallic inks employed in emissions units K006, K007, and K008 shall not exceed 0.258 ton during any calendar month and 2.32 tons, based on a rolling, twelve-month summation.
- d. The fountain solution employed in this emissions unit shall have a VOC content not greater than ten percent VOC (alcohol) by volume at each cooling unit.

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**II. Operational Restrictions**

1. The fountain solution employed in this emissions unit shall be refrigerated at each cooling unit to a temperature not to exceed sixty degrees Fahrenheit.

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

1. The permittee shall collect and record the following information each month for emissions units K006, K007, and K008 combined:
  - a. The name and identification of each surface coating, ink, dampening solution and cleanup material employed.
  - b. The total amount, in gallons, of each surface coating, ink, dampening solution and cleanup material employed, excluding water and exempt solvents.
  - c. The VOC content of each surface coating, ink, dampening solution and cleanup material, in pounds VOC per gallon, excluding water and exempt solvents.
  - d. The total VOC emissions [the summation of line (b) multiplied by line (c) for each listed material] from all surface coatings\*, inks, dampening solutions and cleanup materials employed, in pounds or tons.  
  
\* The emissions from the surface coatings employed shall not include the amount of solvent retained in the web [ i.e., the summation of line (b) multiplied by line (c) for each surface coating, multiplied by 1-

solvent retention (amount retained in the web)]

- e. The updated rolling, twelve-month summation of the VOC emissions, (i.e., the summation of the current calendar month's emission total and the previous eleven calendar months' emissions total).
2. The owner or operator shall measure and record the temperature and VOC content, in percent by volume, of the fountain solution in each cooling unit on a daily basis. The VOC content of the fountain solution shall be measured using a hydrometer.
3. The owner or operator shall calculate and record the calendar month and rolling, twelve-month VOC emissions from the metallic inks employed in emissions units K006, K007, and K008 combined.

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**IV. Reporting Requirements**

1. The permittee shall submit an annual report which specifies for the previous year the total VOC emissions from emissions units K006, K007, and K008 combined. This report shall be submitted by January 30 of each year.
2. The permittee shall submit an annual report which specifies for the previous year the total VOC emissions from the use of metallic inks for emissions units K006, K007, and K008 combined. This report shall be submitted by January 30 of each year.
3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the temperature restriction of sixty degrees Fahrenheit and/or any VOC content measurement of the fountain solution that exceeds ten percent, by volume.
4. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the VOC content limitations specified in A.1.2.a and A.1.2.b, the calendar month limitation in A.1.2.c (0.258 ton), and the rolling, twelve-month emission limitations for VOC specified in A.1.1. (83.51 tons) and A.1.2.c (2.32 tons).

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**V. Testing Requirements**

1. Compliance with the emission limits in Sections A.1.1 and A.1.2 shall be demonstrated by the record keeping in Section A.III.
2. USEPA Method 24A shall be used to determine the VOC contents for materials employed in flexographic printing lines. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24A.
3. Compliance with the VOC content limitations shall be determined by the record keeping required in Section A.III.
4. Compliance with the VOC content and temperature limitations for the fountain solution shall be demonstrated by the monitoring required in Section A.III.

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**VI. Miscellaneous Requirements**

1. None

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**Facility ID: 1431420687 Emissions Unit ID: K007 Issuance type: Title V Draft Permit**

**B. State Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

**I. 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>
51" offset sheet-fed lithographic printing press	OAC rule 3745-31-05 (PTI 14-4646)	

2. **Additional Terms and Conditions**

1. None

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- II. **Operational Restrictions**

1. None

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- III. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
  - a. Background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.).
  - b. A copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

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- IV. **Reporting Requirements**

1. None

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- V. **Testing Requirements**

1. None

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- VI. **Miscellaneous Requirements**

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitations specified in this permit were established using the Ohio EPA's "Air Toxic Policy" and are based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: Isopropyl Alcohol  
 TLV (ug/m3): 983,000  
 Maximum Hourly Emission Rate (lbs/hr): 27.44  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3,809  
 MAGLC (ug/m3): 23,405

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new 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. Changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height).

- c. Changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted.
- d. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.  
 The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:
  - a. The change is not otherwise considered a "modification" under OAC Chapter 3745-31.
  - b. The permittee can continue to comply with the allowable emission limitations specified in its permit to install.
  - c. Prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.  
 For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 1431420687 Emissions Unit ID: K008 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. 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>
51" offset sheet-fed lithographic printing press	OAC rule 3745-31-05 (PTI 14-4646)	The total combined emissions for emissions units K006, K007, and K008 shall not exceed 83.51 tons of VOC, based on a rolling, twelve-month summation.  23.51 lbs/hr VOC**

\*\* The hourly emission limitation is based upon the maximum hourly application rate at 24 hours/day. Therefore, no monitoring, record keeping, or reporting requirements are needed for this limit.

See T&C A.I.2.b.  
See T&C A.I.2.a, A.I.2.c, A.I.2.d and A.II.

2. Additional Terms and Conditions

- a. The permittee shall not exceed the following VOC content limitations, as applied, excluding water and exempt solvents, for emissions units K006, K007, and K008:
  - (a)
    - Varnish Coating 2.8 lbs VOC/gal of coating
    - Aqueous Coating 3.0 lbs VOC/gal of coating
    - Inks (except metallic) 1.2 lbs VOC/gal of coating
    - Metallic Inks 2.5 lbs VOC/gal of coating
  - b. The permittee shall not exceed the following VOC content limitations, as applied, excluding water and exempt solvents, for emissions units K006, K007, and K008:
    - Dampening Solution 0.33 lb VOC/gal of coating
    - Cleanup Material 6.56 lbs VOC/gal of coating

- c. The total combined VOC emissions from the metallic inks employed in emissions units K006, K007, and K008 shall not exceed 0.258 ton during any calendar month and 2.32 tons, based on a rolling, twelve-month summation.
- d. The fountain solution employed in this emissions unit shall have a VOC content not greater than ten percent VOC (alcohol) by volume at each cooling unit.

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#### II. Operational Restrictions

- 1. The fountain solution employed in this emissions unit shall be refrigerated at each cooling unit to a temperature not to exceed sixty degrees Fahrenheit.

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#### III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall collect and record the following information each month for emissions units K006, K007, and K008 combined:
  - a. The name and identification of each surface coating, ink, dampening solution and cleanup material employed.
  - b. The total amount, in gallons, of each surface coating, ink, dampening solution and cleanup material employed, excluding water and exempt solvents.
  - c. The VOC content of each surface coating, ink, dampening solution and cleanup material, in pounds VOC per gallon, excluding water and exempt solvents.
  - d. The total VOC emissions [the summation of line (b) multiplied by line (c) for each listed material] from all surface coatings\*, inks, dampening solutions and cleanup materials employed, in pounds or tons.
    - \* The emissions from the surface coatings employed shall not include the amount of solvent retained in the web [ i.e., the summation of line (b) multiplied by line (c) for each surface coating, multiplied by 1- solvent retention (amount retained in the web)]
    - e. The updated rolling, twelve-month summation of the VOC emissions, (i.e., the summation of the current calendar month's emission total and the previous eleven calendar months' emissions total).
- 2. The owner or operator shall measure and record the temperature and VOC content, in percent by volume, of the fountain solution in each cooling unit on a daily basis. The VOC content of the fountain solution shall be measured using a hydrometer.
- 3. The owner or operator shall calculate and record the calendar month and rolling, twelve-month VOC emissions from the metallic inks employed in emissions units K006, k007, and K008 combined.

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#### IV. Reporting Requirements

- 1. The permittee shall submit an annual report which specifies for the previous year the total VOC emissions from emissions units K006, K007, and K008 combined. This report shall be submitted by January 30 of each year.
- 2. The permittee shall submit an annual report which specifies for the previous year the total VOC emissions from the use of metallic inks for emissions units K006, K007, and K008 combined. This report shall be submitted by January 30 of each year.
- 3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the temperature restriction of sixty degrees Fahrenheit and/or any VOC content measurement of the fountain solution that exceeds ten percent, by volume.
- 4. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the VOC content limitations specified in A.I.2.a and A.I.2.b, the calendar month limitation in A.I.2.c (0.258 ton), and the rolling, twelve-month emission limitations for VOC specified in A.I.1. (83.51 tons) and A.I.2.c (2.32 tons).

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#### V. Testing Requirements

- 1. Compliance with the emission limits in Sections A.I.1 and A.I.2 shall be demonstrated by the record keeping in Section A.III.
- 2. USEPA Method 24A shall be used to determine the VOC contents for materials employed in flexographic printing lines. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements

for Method 24A.

3. Compliance with the VOC content limitations shall be determined by the record keeping required in Section A.III.
4. Compliance with the VOC content and temperature limitations for the fountain solution shall be demonstrated by the monitoring required in Section A.III.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 1431420687 Emissions Unit ID: K008 Issuance type: Title V Draft Permit

**B. State Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **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>
51" offset sheet-fed lithographic printing press	OAC rule 3745-31-05 (PTI 14-4646)	

2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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

1. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
  - a. Background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.).
  - b. A copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

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Pollutant: Isopropyl Alcohol  
TLV (ug/m3): 983,000  
Maximum Hourly Emission Rate (lbs/hr): 27.44  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3,809  
MAGLC (ug/m3): 23,405

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new 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. Changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height).
- c. Changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted.
- d. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. The change is not otherwise considered a "modification" under OAC Chapter 3745-31.
- b. The permittee can continue to comply with the allowable emission limitations specified in its permit to install.
- c. Prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.