

Facility ID: 1483040409 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: 1483040409 Emissions Unit ID: R002 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>
nonheatset web offset lithographic press (#2)	OAC rule 3745-31-05 (PTI 14-4631)	The organic compound (OC) emissions, including OC emissions from inks and blanket wash (cleanup material), from this emissions unit shall not exceed 113.9 pounds/day*.
		Combined annual OC emissions, including OC emissions from inks and blanket wash (cleanup material), from emissions units R001-R003 shall not exceed 19.55 tons/year (TPY).
		See Term and Condition A.2.
		* The daily emission limitation is based upon the emissions unit's potential to emit. Therefore, no daily records are required to demonstrate compliance with this limit.
	OAC rule 3745-21-07(G)	This emissions unit is exempt from the requirements of OAC rule 3745-21-07(G) based on the Operational Restriction in Term and Condition B.1.

2. **Additional Terms and Conditions**
 - (a) The permittee shall not allow the organic compound (OC) content of each ink to exceed 14 percent by weight, as applied.

B. Operational Restrictions

1. The use of any photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] is prohibited.
2. The fountain solution employed shall not contain any organic compounds (as defined in OAC rule 3745-21-01(B)(4)).
3. The maximum combined annual ink and blanket wash usages for emissions units R001, R002, and R003 shall not exceed the following limits:
 - . Material Usages (lbs/yr)
 - a. inks 2,500,000
 - b. blanket wash 43,240
4. 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 mm Hg (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 emissions units R001, R002, and R003 combined:

- a. the company identification of each ink and blanket wash employed;
- b. the OC content of each ink employed, in percent by weight;
- c. the OC content of each blanket wash employed, in percent by weight;
- d. the number of pounds of each ink employed;
- e. the number of pounds of each blanket wash employed;
- f. the total combined OC emissions (summation of $b/100 \times d / 2000 \times 0.05$ lb OC emission/lb OC for each ink and $c/100 \times e/2000$ for each blanket wash) for emissions units R001, R002, and R003, in tons;
- g. a record of each liquid organic material employed in each 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); and
- h. a record of each fountain solution employed in each emissions unit indicating whether or not the fountain solution contains any organic compounds.

D. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] or any fountain solution containing an organic compound(s) was employed in emissions units R001, R002 and R003. This report shall identify the reason for the use of the photochemically reactive material(s) or fountain solution containing an organic compound(s) and the estimated total quantity of materials emitted each such day.
2. The permittee shall submit annual reports which specify the total combined usages, in pounds, of the inks and blanket wash (cleanup materials) and the total combined OC emissions from emissions units R001, R002 and R003. These reports shall be submitted by February 15 of each year and shall cover the previous 12 calendar months.
3. 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.

Refer to Part I, General Term and Condition #3.b. for the reporting frequency for these reports.

E. Testing Requirements

1. Compliance with the emission limitation 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. Emission Limitation: 19.55 TPY OC combined from units R001-R003

Applicable Compliance Method:
Compliance with the annual OC emission limitation shall be based upon the record keeping performed in accordance with Section C.1. of this permit.

 - b. Materials Content and Usage Restrictions:
Inks: 14 percent OC by weight and 2,500,000 pounds/year maximum for units R001, R002, and R003
Blanket wash: 43,240 pounds/year maximum for units R001, R002, and R003

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 blanket wash and inks.

F. Miscellaneous Requirements

1. If probable cause exists indicating the emissions unit is causing or contributing to a nuisance in violation of Ohio Administrative Code rule 3745-15-07, the owner or operator of the emissions unit shall be required to submit and implement a control program which will bring the emissions unit into compliance.
2. This permit allows the use of the coatings and cleanup materials specified by the permittee in the application for PTI number 14-4631. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the organic compound emission limitation(s) specified in this permit were established in accordance with the Ohio EPA's "Air Toxics Policy" and is (are) 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 the pollutants based on the Screen 3 model and a comparison of the predicted 1-hour maximum ground-level concentration to the MAGLC. The following summarizes the results of the modeling for the pollutant(s):
 - Pollutant: Dipropylene glycol monomethyl ether
 - TLV (ug/m3): 606,000
 - Maximum Hourly Emission Rate (lbs/hr): 3.16
 - Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 145.9
 - Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 14,429

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 14-4631 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; and

c. any change to the emissions unit or its method of operation that would either 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.