

Facility ID: 1677010550 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.

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[Go to Part II for Emissions Unit P008](#)

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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>
H40-8 8 color printing press	OAC Rule 3745-31-05 (PTI 16-1593)	6.14 lbs/hr of organic material; 0.32 lb/hr of methanol
	OAC Rule 3745-21-07 (G)	exempt - see B.1

2. **Additional Terms and Conditions**
 - (a) None

B. Operational Restrictions

1. The permittee shall not employ any photochemically reactive coatings, inks, solvents or cleanup materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each month for the printing operation:
 - a. the company identification for each coating, ink and cleanup material employed;
 - b. the number of gallons of each coating, ink and cleanup material employed;
 - c. the organic compound content of each coating, ink and cleanup material, in pounds per gallon;
 - d. the total organic compound emission rate for all coatings, inks and cleanup materials, in pounds per month;
 - e. the total number of hours the emissions unit was in operation; and
 - f. the average hourly organic compound emission rate for all coatings, inks and cleanup materials, i.e., (d)/(e), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]
2. In order to demonstrate compliance with methanol limit the permittee shall collect and record the following information for each month for the printing operation:
 - a. the company identification for each coating, ink and cleanup material employed;
 - b. the number of gallons of each coating, ink and cleanup material employed;
 - c. the methanol content of each coating, ink and cleanup material, in pounds per gallon;
 - d. the total methanol emission rate for all coatings, inks and cleanup materials, in pounds per month;
 - e. the total number of hours the emissions unit was in operation; and
 - f. the average hourly emission rate for all coatings, inks and cleanup materials, i.e., (d)/(e), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. an identification of each month during which the average hourly total organic compound emissions exceeded 6.14 lbs/hr, and the actual average hourly organic compound emissions for each such month; and
 - b. an identification of each month during which the average hourly total methanol emissions exceeded 0.32 lb/hr, and the actual average hourly organic compound emissions for each such month.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:
Operational Restriction:

no photochemically reactive materials

Applicable Compliance Method:

Compliance shall be demonstrated through maintaining the daily records required in Section C.1.
Emission Limitation:

6.14 lbs/hr of organic materials

Applicable Compliance Method:

Compliance shall be demonstrated through maintaining the records of the monthly usage, the organic compound content of each ink, solvent, and clean-up material employed, and the mass organic compound emission rate required in Section C.1. Formulation data or USEPA Method 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the organic compound contents of the inks, solvents, and clean-up materials employed. The annual mass organic compound emission rate shall be calculated by summing the monthly mass emission rates as calculated above for the previous twelve months.
Emission Limitation:

0.32 lb/hr of methanol

Applicable Compliance Method:

Compliance shall be demonstrated through maintaining the records of monthly usage, the methanol content of each ink, solvent, and clean-up material employed, and the methanol emission rate as an hourly average required in Section C.2.

F. Miscellaneous Requirements

1. None

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Part II - Special Terms and Conditions

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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>
Lithographic printing press - H40-6 (6/color offset press)	OAC rule 3745-31-05 (PTI# 16-1918)	12.1 lbs/hr of organic compounds (OC) 53.0 tpy of OC

See B.1 below.

OAC rule 3745-21-07(G)(2)

2. **Additional Terms and Conditions**
- (a) None
- B. **Operational Restrictions**
1. The permittee shall not employ any photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit.
- C. **Monitoring and/or Record Keeping Requirements**
1. The permittee shall collect and record the following information each month for the coating operation:
- the company identification for each coating, ink and cleanup material employed and documentation as to whether or not it is a photochemically reactive material;
 - the number of gallons of each coating, ink and cleanup material employed;
 - the OC content of each coating, ink and cleanup material, in lbs/gal;
 - the total OC emission rate for all coatings, inks and cleanup materials, in lbs/month;
 - the total number of hours the emissions unit was in operation;
 - the average hourly OC emission rate for all coatings, inks, and cleanup materials, i.e., (d)/(e), in lbs/hr (average); and
 - the total, year-to-date OC emission rate for all coatings, inks and cleanup materials, i.e., the sum of (d), in tpy.
- [Note: The coating information must be for the coatings and inks as employed, including any thinning solvents added at the emissions unit.]
- D. **Reporting Requirements**
- The permittee shall submit deviation (excursion) reports which include an identification of each record during which the average hourly total OC emissions exceeded 12.1 pounds per hour, and the actual average hourly OC emissions for each such record.
 - The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.
 - The permittee shall also submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. The report shall be submitted by January 31 of each year.
 - The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing if a "photochemically reactive material" [as defined in OAC rule 3745-21-01(C)(5)] is employed in the emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after such an occurrence.
- E. **Testing Requirements**
- Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
Emission Limitation:
12.1 lbs/hr of OC

Applicable Compliance Method:
The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of section C.1 of these T&Cs.
Emission Limitation:
53.0 tpy of OC

Applicable Compliance Method:
The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of section C.1 of these T&Cs.

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 coatings and inks.

Formulation data shall be used to determine the OC contents of the cleanup material.
- F. **Miscellaneous Requirements**
- Pursuant to Engineering Guide #69, modeling to demonstrate compliance with the Ohio EPA's Air Toxic Policy was not necessary since the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. 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 OAC rule 3745-31-01. The permittee is hereby advised that 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 to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.