

Facility ID: 1677011072 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.

[Go to Part II for Emissions Unit K001](#)

[Go to Part II for Emissions Unit K002](#)

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

Facility ID: 1677011072 Emissions Unit ID: K001 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>
Lithographic non-heatset sheet-fed printing line	OAC rule 3745-31-05 (PTI 16-1654)	11 lbs/hr of organic material See A.2.a below.
	OAC rule 3745-21-07	See A.2.b below.

2. Additional Terms and Conditions

- (a) Based on application data, potential emissions of organic material from this emissions unit is 48 tons/year (TPY) and facility-wide (i.e., including both emissions units K001 and K002) potential emissions of organic material is 96 TPY. Therefore, no record keeping to monitor annual emissions of organic material is required.

Based on application data, facility-wide potential emissions of total combined hazardous air pollutants (HAP) is 3 TPY. Therefore, no record keeping to monitor HAP emissions is required. Pursuant to OAC rule 3745-21-07(G)(9), this emissions unit is exempt from the provisions of OAC rule 3745-21-07(G).

B. Operational Restrictions

1. The permittee shall not employ any photochemically reactive material, as defined by 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 calendar month to determine average hourly emissions of organic material from this emissions unit:
 - a. the name and identification of each ink employed;
 - b. the organic material content of each ink employed, in pounds of organic material per gallon of ink;
 - c. the number of gallons of each ink employed;
 - d. the name and identification of each solvent employed;
 - e. the organic material content of each solvent employed, in pounds of organic material per gallon of solvent;
 - f. the total number of hours the emissions unit was in operation; and
 - g. the average hourly organic material emissions contributed from all inks and solvents employed.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports identifying each calendar month during which the calculated average hourly organic material emissions rate exceeded the organic material emissions limitation of 11 lbs/hr.
2. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition 3.

E. Testing Requirements

1. Compliance with the emission limitation in Section A.1 of these terms and conditions shall be determined in accordance with the following method:
Emission Limitation:

11 lbs/hr of organic material

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limitation based upon the record keeping requirements of Section C.1. Formulation data or USEPA Methods 24/24A shall be used to determine the organic material contents of the inks and solvents.

F. Miscellaneous Requirements

1. The permittee is hereby notified that this permit and all agency records concerning this permitted emissions unit are subject to public disclosure in accordance with OAC rule 3745-49-03.
2. The permittee shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of this emissions unit.
3. This permit allows the use of the inks and solvents specified by the permittee in the application for PTI 16-1654. In conjunction with the best available technology requirements of OAC rule 3745-31-05, pollutant ground-level concentrations were derived in accordance with the Ohio EPA's "Air Toxics Policy" ("A.T.P."), based on the facility-wide ink/solvent usage rates, formulation data, and the volume source parameters of the facility building (there are no stacks as egress points for this emissions unit and the other emissions unit, which are both located in the same building), as specified in the permit application. Compliance with the Ohio EPA's "A.T.P." was demonstrated for various pollutants based on the Screen3 model and a comparison of 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 Isopropyl Alcohol, Solvent Naphtha Medium Aliphatic (i.e., Stoddard Solvent), and VM&P Naphtha:

Pollutant: isopropyl alcohol (CAS 67-63-0)

TWA (ug/m3): 983,000
 Facility-wide Maximum Average Hourly Emission Rate (lbs/hr): 11.8
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3,700
 MAGLC (ug/m3): 23,000

Pollutant: solvent naphtha medium aliphatic (CAS 8052-41-3)

TWA (ug/m3): 525,000
 Facility-wide Maximum Average Hourly Emission Rate (lbs/hr): 1.8
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 570
 MAGLC (ug/m3): 12,000

Pollutant: vm&p naphtha (CAS 8032-32-4)

TWA (ug/m3): 1,370,000
 Facility-wide Maximum Average Hourly Emission Rate (lbs/hr): 2.8
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 880
 MAGLC (ug/m3): 33,000
4. Any of the following changes may be deemed a "modification" to the emissions unit(s) and, as such, prior notification to and approval from the Akron Air Pollution Control Agency is required, including the possible issuance of modifications to PTI 16-1654 and the operating permit:
 - a. any changes in the composition of the inks or solvents, or the use of new inks or solvents, that would result in the emission of a compound with a lower Time-Weighted Average (TWA) threshold level, as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)", than the lowest TWA value specified in the above table;
 - b. any change in the emission rate(s) of the emissions unit(s) or the volume source parameters of the facility building that would result in an exceedance of any MAGLC specified in the above table;
 - c. any change to any 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;
 - d. any change in the composition of the inks or solvents, or use of new inks or solvents, that would result in the emission of any of the exempted organic compounds included in the definition of "VOC" [OAC rule 3745-21-01 (B)(6)]; and
 - e. any change in the composition of the inks or solvents, or the use of new inks or solvents, that would result in additional and/or increased emissions of any HAP as defined in OAC rule 3745-77-01(V).

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Facility ID: 1677011072 Emissions Unit ID: K002 Issuance type: Final State Permit To Operate

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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 non-heatset sheet-fed printing line	OAC rule 3745-31-05 (PTI 16-1654)	11 lbs/hr of organic material See A.2.a below.
	OAC rule 3745-21-07	See A.2.b below.

2. Additional Terms and Conditions

- (a) Based on application data, potential emissions of organic material from this emissions unit is 48 tons/year (TPY) and facility-wide (i.e., including both emissions units K001 and K002) potential emissions of organic material is 96 TPY. Therefore, no record keeping to monitor annual emissions of organic material is required.

Based on application data, facility-wide potential emissions of total combined hazardous air pollutants (HAP) is 3 TPY. Therefore, no record keeping to monitor HAP emissions is required.
Pursuant to OAC rule 3745-21-07(G)(9), this emissions unit is exempt from the provisions of OAC rule 3745-21-07(G).

B. Operational Restrictions

1. The permittee shall not employ any photochemically reactive material, as defined by 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 calendar month to determine average hourly emissions of organic material from this emissions unit:
 - a. the name and identification of each ink employed;
 - b. the organic material content of each ink employed, in pounds of organic material per gallon of ink;
 - c. the number of gallons of each ink employed;
 - d. the name and identification of each solvent employed;
 - e. the organic material content of each solvent employed, in pounds of organic material per gallon of solvent;
 - f. the total number of hours the emissions unit was in operation; and
 - g. the average hourly organic material emissions contributed from all inks and solvents employed.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports identifying each calendar month during which the calculated average hourly organic material emissions rate exceeded the organic material emissions limitation of 11 lbs/hr.
2. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition 3.

E. Testing Requirements

1. Compliance with the emission limitation in Section A.1 of these terms and conditions shall be determined in accordance with the following method:
Emission Limitation:
11 lbs/hr of organic material

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limitation based upon the record keeping requirements of Section C.1. Formulation data or USEPA Methods 24/24A shall be used to determine the organic material contents of the inks and solvents.

F. Miscellaneous Requirements

1. The permittee is hereby notified that this permit and all agency records concerning this permitted emissions unit are subject to public disclosure in accordance with OAC rule 3745-49-03.

2. The permittee shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of this emissions unit.
3. This permit allows the use of the inks and solvents specified by the permittee in the application for PTI 16-1654. In conjunction with the best available technology requirements of OAC rule 3745-31-05, pollutant ground-level concentrations were derived in accordance with the Ohio EPA's "Air Toxics Policy" ("A.T.P."), based on the facility-wide ink/solvent usage rates, formulation data, and the volume source parameters of the facility building (there are no stacks as egress points for this emissions unit and the other emissions unit, which are both located in the same building), as specified in the permit application. Compliance with the Ohio EPA's "A.T.P." was demonstrated for various pollutants based on the Screen3 model and a comparison of 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 Isopropyl Alcohol, Solvent Naphtha Medium Aliphatic (i.e., Stoddard Solvent), and VM&P Naphtha:

Pollutant: isopropyl alcohol (CAS 67-63-0)

TWA (ug/m3): 983,000
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Pollutant: vm&p naphtha (CAS 8032-32-4)

TWA (ug/m3): 1,370,000
Facility-wide Maximum Average Hourly Emission Rate (lbs/hr): 2.8
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 880
MAGLC (ug/m3): 33,000
4. Any of the following changes may be deemed a "modification" to the emissions unit(s) and, as such, prior notification to and approval from the Akron Air Pollution Control Agency is required, including the possible issuance of modifications to PTI 16-1654 and the operating permit:
 - a. any changes in the composition of the inks or solvents, or the use of new inks or solvents, that would result in the emission of a compound with a lower Time-Weighted Average (TWA) threshold level, as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)", than the lowest TWA value specified in the above table;
 - b. any change in the emission rate(s) of the emissions unit(s) or the volume source parameters of the facility building that would result in an exceedance of any MAGLC specified in the above table;
 - c. any change to any 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;
 - d. any change in the composition of the inks or solvents, or use of new inks or solvents, that would result in the emission of any of the exempted organic compounds included in the definition of "VOC" [OAC rule 3745-21-01 (B)(6)]; and
 - e. any change in the composition of the inks or solvents, or the use of new inks or solvents, that would result in additional and/or increased emissions of any HAP as defined in OAC rule 3745-77-01(V).