

Facility ID: 1677011120 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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Facility ID: 1677011120 Emissions Unit ID: R001 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>
R001 - 5-color Heidelberg Speedmaster sheet-fed non-heatset lithographic printing press 285.	OAC rule 3745-31-05(A)(3) (PTI #16-02029)	1.5 pounds of volatile organic compounds (VOC) per hour from the coatings, the fountain solution concentrates, the fountain solution additives, and the cleanup materials
		6.57 tons of VOC per year from the coatings, the fountain solution concentrates, the fountain solution additives, and the cleanup materials
		See A.2.a below.

OAC rule 3745-21-09(G)(2)

2. **Additional Terms and Conditions**
 - (a) The emission limitations based on this applicable rule are less stringent than the limit established pursuant to OAC rule 3745-31-05.

B. Operational Restrictions

1. The hand wash rags shall be kept in closed containers.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each month for this emissions unit:
 - a. the company identification for each coating, fountain solution concentrate, fountain solution additive, and cleanup material employed;
 - b. the number of gallons or pounds of each coating, fountain solution concentrate, fountain solution additive, and cleanup material employed;
 - c. the volatile organic compound content of each coating, fountain solution concentrate, fountain solution additive, and cleanup material, in pounds per gallon or weight fraction;
 - d. the total volatile organic compound emission rate for all coatings, fountain solution concentrates, fountain solution additives, and cleanup materials (i.e., the sum of (b) times (c) times 0.05* for each oil-based coating plus the sum of (b) times (c) for each aqueous-based coating plus the sum of (b) times (c) for each fountain solution concentrate plus the sum of (b) times (c) for each fountain solution additive plus the sum of (b) times (c) times 0.5** for each manual cleanup material with a composite vapor pressure less than 10 millimeters of mercury at 20 degrees Celsius plus the sum of (b) times (c) for each cleanup material other than the manual blanket wash cleanup materials with a composite vapor pressure less than 10 millimeters of mercury at 20 degrees Celsius), in pounds per month;
 - e. the total number of hours the emissions unit was in operation; and
 - f. the average hourly volatile organic compound emission rate for all coatings, fountain solution concentrates,

fountain solution additives, automatic cleanup materials and manual cleanup materials, i.e., (d)/(e), in pounds per hour (average).

*Ohio EPA, Division of Air Pollution Control, Engineering Section, Engineering Guide #68 (dated July 7, 1997) states that only 5% of the ink solvent is emitted from non-heatset inks.

**Ohio EPA, Division of Air Pollution Control, Engineering Section, Engineering Guide #68 (dated July 7, 1997) states 50% of the solvent is retained in the shop towel and 50% is emitted for cleanup solvents which have a composite vapor pressure less than 10 millimeters of mercury at 20 degrees Celsius.

2. The permit to install for this emissions unit (R001) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: isopropyl alcohol

TLV (mg/m3): 983

Maximum Hourly Emission Rate (lbs/hr): 6.37*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 14205

MAGLC (ug/m3): 23404.8

* The maximum hourly emission rate is the emission rates from emissions units R001, R002 and R003 combined.

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- 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 previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which includes an identification of each month during which the average hourly volatile organic compound emissions from the coatings, fountain solution concentrates, fountain solution additives, and cleanup materials exceeded 1.5 pounds per hour, and the actual average hourly volatile organic compound emissions for each such month.
2. The permittee shall also submit annual reports which specify the total volatile organic compound emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
3. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition 3 of this permit.

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):
Emission Limitation
1.5 pounds of VOC per hour
6.57 tons of VOC per year

Applicable Compliance Method

Compliance with the emissions limitations shall be determined through record keeping of the coating, the fountain solution concentrate, the fountain solution additive, and the cleanup material usage, VOC content of each coating, fountain solution concentrate, fountain solution additive, and cleanup material, and operating hours per month as required in section C.1 of these terms and conditions. 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 VOC contents of the coatings. Formulation data shall be used to determine the VOC contents of the fountain solution concentrates, the fountain solution additives, and the cleanup materials.

F. **Miscellaneous Requirements**

- 1. None

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Facility ID: 1677011120 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>
R002 - 6-color Planeta Supervariant sheet-fed non-heatset lithographic printing press 406.	OAC rule 3745-31-05(A)(3) (PTI #16-02029)	2.81 pounds of volatile organic compounds (VOC) per hour from the coatings, the fountain solution concentrates, the fountain solution additives, and the cleanup materials
		12.31 tons of VOC per year from the coatings, the fountain solution concentrates, the fountain solution additives, and the cleanup materials
	OAC rule 3745-21-09(G)(2)	When a photochemically reactive material is employed the VOC emissions for that day shall be limited to 40 pounds of VOC per day for the coatings, fountain solution concentrates, fountain solution additives, and photochemically reactive cleanup materials (See A.2.a below.)

- 2. **Additional Terms and Conditions**
 - (a) The hourly emission limitation based on this applicable rule is less stringent than the limit established pursuant to OAC rule 3745-31-05.

B. **Operational Restrictions**

- 1. The hand wash rags shall be kept in closed containers.

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

- 1. The permittee shall collect and record the following information for each month for this emissions unit:
 - a. the company identification for each coating, fountain solution concentrate, fountain solution additive, and cleanup material employed;
 - b. the number of gallons or pounds of each coating, fountain solution concentrate, fountain solution additive, and cleanup material employed;
 - c. the volatile organic compound content of each coating, fountain solution concentrate, fountain solution additive, and cleanup material, in pounds per gallon or weight fraction;

- d. the total volatile organic compound emission rate for all coatings, fountain solution concentrates, fountain solution additives, and cleanup materials (i.e., the sum of (b) times (c) times 0.05* for each oil-based coating plus the sum (b) times (c) for each aqueous-based coating plus the sum of (b) times (c) for each fountain solution concentrate plus the sum of (b) times (c) for each fountain solution additive plus the sum of (b) times (c) times 0.5** for each manual cleanup material with a composite vapor pressure less than 10 millimeters of mercury at 20 degrees Celsius plus the sum of (b) times (c) for each cleanup material other than the manual blanket wash cleanup materials with a composite vapor pressure less than 10 millimeters of mercury at 20 degrees Celsius), in pounds per month;
- e. the total number of hours the emissions unit was in operation; and
- f. the average hourly volatile organic compound emission rate for all coatings, fountain solution concentrates, fountain solution additives, automatic cleanup materials and manual cleanup materials, i.e., (d)/(e), in pounds per hour (average).

*Ohio EPA, Division of Air Pollution Control, Engineering Section, Engineering Guide #68 (dated July 7, 1997) states that only 5% of the ink solvent is emitted from non-heatset inks.

**Ohio EPA, Division of Air Pollution Control, Engineering Section, Engineering Guide #68 (dated July 7, 1997) states 50% of the solvent is retained in the shop towel and 50% is emitted for cleanup solvents which have a composite vapor pressure less than 10 millimeters of mercury at 20 degrees Celsius.

2. The permittee shall maintain records of the following information for the emissions unit:
- the MSDS sheets for each coating, fountain solution concentrate, fountain solution additive, and cleanup material currently employed;
 - documentation as to whether or not each coating, fountain solution concentrate, fountain solution additive, and cleanup material is a photochemically reactive material; and
 - when a new coating, fountain solution concentrate, fountain solution additive, or cleanup material is going to be employed in the coating line, the permittee shall determine and document prior to employing the new coating, fountain solution concentrate, fountain solution additive, or cleanup material whether or not it is a photochemically reactive material.
3. If it is determined that a photochemically reactive material is being employed in this emissions unit, the permittee shall collect and record the following information for each day for this emissions unit:
- the company identification for each coating and cleanup material employed;
 - documentation of whether each coating, fountain solution concentrate, fountain solution additive, and cleanup material employed is a photochemically reactive material;
 - for each day during which a photochemically reactive material is employed, the number of gallons or pounds of each coating, fountain solution concentrate, fountain solution additive, and photochemically reactive cleanup material employed;
 - the volatile organic compound content of each coating, fountain solution concentrate, fountain solution additive, and photochemically reactive cleanup material, in pounds per gallon or weight fraction; and
 - for each day during which a photochemically reactive material is employed, the total organic compound emission rate for all coatings, fountain solution concentrates, fountain solution additives, and photochemically reactive cleanup materials, in pounds per day.

[Note: The definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

4. The permit to install for this emissions unit (R002) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: isopropyl alcohol

TLV (mg/m3): 983

Maximum Hourly Emission Rate (lbs/hr): 6.37*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 14205

MAGLC (ug/m3): 23404.8

* The maximum hourly emission rate is the emission rates from emissions units R001, R002 and R003 combined.

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- 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 previously modeled;

- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which includes an identification of each month during which the average hourly volatile organic compound emissions from the coatings, fountain solution concentrates, fountain solution additives, and cleanup materials exceeded 2.81 pounds per hour, and the actual average hourly volatile organic compound emissions for each such month.
2. The permittee shall submit deviation (excursion) reports which include, for the days during which a photochemically reactive material was employed, an identification of each day during which the volatile organic compound emissions from the coatings, fountain solution concentrates, fountain solution additives, and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual volatile organic compound emissions for each such day.
3. The permittee shall also submit annual reports which specify the total volatile organic compound emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
4. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition 3 of this permit.

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):
Emission Limitation

2.81 pounds of VOC per hour

12.31 tons of VOC per year

Applicable Compliance Method

Compliance with the emissions limitations shall be determined through record keeping of the coating, the fountain solution concentrate, the fountain solution additive, and the cleanup material usage, VOC content of each coating, fountain solution concentrate, fountain solution additive, and cleanup material, and operating hours per month as required in section C.1 of these terms and conditions. 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 VOC contents of the coatings. Formulation data shall be used to determine the VOC contents of the fountain solution concentrates, the fountain solution additives, and the cleanup materials.
Emission Limitation

40 pounds of VOC per day

Applicable Compliance Method

If a photochemically reactive material is employed, compliance with the emissions limitations shall be determined through daily record keeping of the coating, the fountain solution concentrate, the fountain solution additive, and the photochemically reactive cleanup material usage, VOC content of each coating, fountain solution concentrate, fountain solution additive, and photochemically reactive cleanup material, and operating hours per day as required in section C.3 of these terms and conditions. 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 VOC contents of the coatings. Formulation data shall be used to determine the VOC contents of the fountain solution concentrates, the fountain solution additives, and the photochemically reactive cleanup materials.

F. Miscellaneous Requirements

1. None

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Facility ID: 1677011120 Emissions Unit ID: R003 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>
R003 - 8-color Roland 700 sheet-fed non-heatset lithographic printing press with aqueous coater 418.	OAC rule 3745-31-05(A)(3) (PTI #16-02029)	5.21 pounds of volatile organic compounds (VOC) per hour from the coatings, the fountain solution concentrates, the fountain solution additives, and the cleanup materials
		22.82 tons of VOC per year from the coatings, the fountain solution concentrates, the fountain solution additives, and the cleanup materials
	OAC rule 3745-21-09(G)(2)	When a photochemically reactive material is employed the VOC emissions for that day shall be limited to 40 pounds of VOC per day for the coatings, fountain solution concentrates, fountain solution additives, and photochemically reactive cleanup materials (See A.2.a below.)

2. Additional Terms and Conditions

- (a) The hourly emission limitation based on this applicable rule is less stringent than the limit established pursuant to OAC rule 3745-31-05.

B. Operational Restrictions

1. The hand wash rags shall be kept in closed containers.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each month for this emissions unit:
 - a. the company identification for each coating, fountain solution concentrate, fountain solution additive, and cleanup material employed;
 - b. the number of gallons or pounds of each coating, fountain solution concentrate, fountain solution additive, and cleanup material employed;
 - c. the volatile organic compound content of each coating, fountain solution concentrate, fountain solution additive, and cleanup material, in pounds per gallon or weight fraction;
 - d. the total volatile organic compound emission rate for all coatings, fountain solution concentrates, fountain solution additives, and cleanup materials (i.e., the sum of (b) times (c) times 0.05* for each oil-based coating plus the sum (b) times (c) for each aqueous-based coating plus the sum of (b) times (c) for each fountain solution concentrate plus the sum of (b) times (c) for each fountain solution additive plus the sum of (b) times (c) times 0.5** for each manual cleanup material with a composite vapor pressure less than 10 millimeters of mercury at 20 degrees Celsius plus the sum of (b) times (c) for each cleanup material other than the manual blanket wash cleanup materials with a composite vapor pressure less than 10 millimeters of mercury at 20 degrees Celsius), in pounds per month;
 - e. the total number of hours the emissions unit was in operation; and
 - f. the average hourly volatile organic compound emission rate for all coatings, fountain solution concentrates, fountain solution additives, automatic cleanup materials and manual cleanup materials, i.e., (d)/(e), in pounds per hour (average).

*Ohio EPA, Division of Air Pollution Control, Engineering Section, Engineering Guide #68 (dated July 7, 1997) states that only 5% of the ink solvent is emitted from non-heatset inks.

**Ohio EPA, Division of Air Pollution Control, Engineering Section, Engineering Guide #68 (dated July 7, 1997) states 50% of the solvent is retained in the shop towel and 50% is emitted for cleanup solvents which have a

composite vapor pressure less than 10 millimeters of mercury at 20 degrees Celsius.

2. The permittee shall maintain records of the following information for the emissions unit:
 - a. the MSDS sheets for each coating, fountain solution concentrate, fountain solution additive, and cleanup material currently employed;
 - b. documentation as to whether or not each coating, fountain solution concentrate, fountain solution additive, and cleanup material is a photochemically reactive material; and
 - c. when a new coating, fountain solution concentrate, fountain solution additive, or cleanup material is going to be employed in the coating line, the permittee shall determine and document prior to employing the new coating, fountain solution concentrate, fountain solution additive, or cleanup material whether or not it is a photochemically reactive material.
3. If it is determined that a photochemically reactive material is being employed in this emissions unit, the permittee shall collect and record the following information for each day for this emissions unit:
 - a. the company identification for each coating and cleanup material employed;
 - b. documentation of whether each coating, fountain solution concentrate, fountain solution additive, and cleanup material employed is a photochemically reactive material;
 - c. for each day during which a photochemically reactive material is employed, the number of gallons or pounds of each coating, fountain solution concentrate, fountain solution additive, and photochemically reactive cleanup material employed;
 - d. the volatile organic compound content of each coating, fountain solution concentrate, fountain solution additive, and photochemically reactive cleanup material, in pounds per gallon or weight fraction; and
 - e. for each day during which a photochemically reactive material is employed, the total organic compound emission rate for all coatings, fountain solution concentrates, fountain solution additives, and photochemically reactive cleanup materials, in pounds per day.

[Note: The definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

4. The permit to install for this emissions unit (R003) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: isopropyl alcohol

TLV (mg/m3): 983

Maximum Hourly Emission Rate (lbs/hr): 6.37*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 14205

MAGLC (ug/m3): 23404.8

* The maximum hourly emission rate is the emission rates from emissions units R001, R002 and R003 combined.

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

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 previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which includes an identification of each month during which the average hourly volatile organic compound emissions from the coatings, fountain solution concentrates, fountain solution additives, and cleanup materials exceeded 5.21 pounds per hour, and the actual average hourly volatile organic compound emissions for each such month.
2. The permittee shall submit deviation (excursion) reports which include, for the days during which a photochemically reactive material was employed, an identification of each day during which the volatile organic compound emissions from the coatings, fountain solution concentrates, fountain solution additives, and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual volatile organic compound emissions for each such day.
3. The permittee shall also submit annual reports which specify the total volatile organic compound emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
4. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition 3 of this permit.

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):

Emission Limitation

5.21 pounds of VOC per hour

22.82 tons of VOC per year

Applicable Compliance Method

Compliance with the emissions limitations shall be determined through record keeping of the coating, the fountain solution concentrate, the fountain solution additive, and the cleanup material usage, VOC content of each coating, fountain solution concentrate, fountain solution additive, and cleanup material, and operating hours per month as required in section C.1 of these terms and conditions. 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 VOC contents of the coatings. Formulation data shall be used to determine the VOC contents of the fountain solution concentrates, the fountain solution additives, and the cleanup materials.

Emission Limitation

40 pounds of VOC per day

Applicable Compliance Method

If a photochemically reactive material is employed, compliance with the emissions limitations shall be determined through daily record keeping of the coating, the fountain solution concentrate, the fountain solution additive, and the photochemically reactive cleanup material usage, VOC content of each coating, fountain solution concentrate, fountain solution additive, and photochemically reactive cleanup material, and operating hours per day as required in section C.3 of these terms and conditions. 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 VOC contents of the coatings. Formulation data shall be used to determine the VOC contents of the fountain solution concentrates, the fountain solution additives, and the photochemically reactive cleanup materials.

F. Miscellaneous Requirements

1. None