



State of Ohio Environmental Protection Agency

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10/1/2008

JOHN PETERS
CENVEO
1635 COINING DR.
TOLEDO, OH 43612

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0448011240
Permit Number: P0103863
Permit Type: Renewal
County: Lucas

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR
No	CEMS
No	MACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, Toledo Blade. A copy of the public notice and the draft permit are enclosed. This permit has been posted to the Division of Air Pollution Control Web page <http://www.epa.state.oh.us/dapc> in Microsoft Word and Adobe Acrobat format. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

and Toledo Department of Environmental Services
348 South Erie Street
Toledo, OH 43604

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install and operate will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install and Operate is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Toledo Department of Environmental Services at (419)936-3015.

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
TDES; Michigan; Indiana; Canada

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install and Operate
CENVEO

Issue Date: 10/1/2008
Permit Number: P0103863
Permit Type: Renewal
Permit Description: FEPTIO for 3 printing lines formerly PTI 04-01499, issued 5/6/2008.
Facility ID: 0448011240
Facility Location: CENVEO
1635 COINING DR.,
Toledo, OH 43612
Facility Description: Commercial Lithographic Printing

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio has issued a draft action of an air pollution control, federally enforceable permit-to-install and operate (PTIO) for the facility at the location identified above on the date indicated. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Mary Lehman-Schmidt at Toledo Department of Environmental Services, 348 South Erie Street or (419)936-3015. The permit can be downloaded from the Web page: www.epa.state.oh.us/dapc

Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

CENVEO is a printing facility located in Lucas county. PTI 04-01499, issued 5/6/2008 was for the installation of (1) Heidelberg CD 102-6+L Perfector sheetfed printing press, 6 color print towers, with aqueous coater and infrared dryer; (2) Heidelberg SP 102-6+L Sheetfed Printing Press, 6 color print towers with aqueous coater and infrared dryer; and (3) Manroland 906/8LV Sheetfed Printing Press, 6 color print towers with aqueous coater and infrared dryer and stacker to be used for the production of printed material. Each unit is dried by a electric-powered infrared dryer (i.e. no pollutants of combustion emitted) without additional controls. These emissions units were installed on 5/28/2008. Sources of emissions include:

I. Printing Inks and In-line Coatings

II. Fountain Solutions

III. Cleanup Solvents

A.

B. This FEPTIO has been prepared to issue the facility an operating permit and it will be issued draft-final like the PTI was.

Applicable Rules/Regulations

OAC rule 3745-31-05(A)(3) BAT (SB 265 analysis)

OAC rule 3745-31-05(D) Voluntary tpy limitation for VOC

OAC rule 3745-17-07(A)(1) 20% opacity as a 6-minute average, from the stack

OAC rule 3745-17-11(B)(1) 0.551 lb PE/hr

OAC rule 3745-18-06 not applicable, infrared dryer is electric (no pollutants of combustion emitted)

OAC rule 3745-21-08 not applicable, infrared dryer is electric (no pollutants of combustion emitted)

OAC rule 3745-21-07 This rule was refiled on 1/8/2008 and is not applicable to new sources: 40 CFR Part 63, Subpart KK NESHAPS for Printing and Publishing Industry; not applicable, because these printers are lithographic printing presses.

B.A.T. DETERMINATION

Senate Bill 265 (S.B. 265), effective August 3, 2006, provides for a "less than 10 tpy BAT exemption" for sources installed on or after August 3, 2006 under certain conditions. CENVEO Corporation proposes to install three new sheetfed printing presses. Volatile organic compound (VOC) emissions are less than 10 tpy for each emissions unit. Therefore, under S.B. 265, B.A.T. does not apply to the new emissions units.

The S.B. 265 analysis says that B.A.T. does not apply because emissions are less than 10 tpy and any applicable rule-based limits should be used. There are not any rule-based limits that apply to these emissions units.

The facility will be required to track coating usages to ensure that emissions remain below 10 tpy.

3. Facility Emissions and Attainment Status:

4. Source Emissions:

FACILITY EMISSIONS

The applicant has calculated emissions based on current production demands (EAC form 3108 for K010, K011, and K012). Because the emissions from these units are so low, TDOES has added a 50% buffer to the projected coatings usage rates to allow for greater flexibility in the future.

The following coating usages were provided by the applicant. For purposes of calculating emissions for these units and to allow greater operational flexibility, the volumes used to calculate emissions were increased 50% as shown:

	<u>K010 Permittee Requested</u>	<u>50% Buffer Added</u>	<u>K011 Permittee Requested</u>	<u>50% Buffer Added</u>	<u>K012 Permittee Requested</u>	<u>50% Buffer Added</u>
Inks & Varnishes (lb/yr)	28,000	42,000	27,000	40,500	68,000	102,000
Clean up Solvents (gal/yr)	380	570	430	645	480	720
Fountain Solution Additives (gal/yr)	220	330	180	270	380	570
In-Line Coatings (gal/yr)	2,640	3,960	1,980	2,970	7,480	11,220

Source Emissions Calculations, K010 (Heidleberg CD 102-6+L Perfector)

The Heidelber CD 102-6+L Perfector is 6-unit press capable of 9,000 impressions per hour, sheetfed printer with a maximum impression width of 28 inches. The unit is equipped with one infrared dryer. The unit uses 28,000 pounds of ink per year with a VOC content of 13.64% VOC by weight (20% VOC in ink retained by substrate/80% to dryer per Engineering guide #56). The fountain solution (Anchor Lithkemoko 2964-Emerald(R)) usage is 220 gallons per year with a VOC content of 1.88 pounds VOC/gallon (70% VOC from alcohol substitutes to dryer, 30% fugitive per Engineering guide #56). The cleanup solvents (Graphic Arts Specialties Wash B-004) usage is 380 gallons per year with a VOC content of 3.35 pounds VOC per gallon (50% VOC in cleanup solvent for hand wash is retained in cloths, 50% emitted as fugitive, per Engineering guide #56). The in-line coatings (Coatings &

Aquesives Corp 1428 A,B,BC,C,D) usage is 2,640 gallons per year with a VOC content of 0.137 pounds VOC per gallon. The usage volumes have all been increased to allow for more flexibility. There are no photochemically reactive materials used in this printer, including cleanup materials. The press is cleaned by manually wiping the unit with rags, storing the used rags in a closed container, and sending the containers off-site for laundering. The maximum operating schedule is 24 hours per day, 260 days per year (6,240 hrs/yr).

OEPA Engineering Guide #56 dated 6/15/1999 specifies how to calculate the stack and fugitive emissions from ink, fountain solution and cleanup solvent as follows.

Stack emissions, S, (lbs/hr) from the printing process:

$$S = (1 - DRE)[0.8 (P) + Ad (FS) + Bd (CS)]$$

Fugitive emissions, F, (lbs/hr) from printing process are:

$$F = Af(FS) + Bf(CS)$$

$$\text{Total emissions} = S + F$$

where:

DRE = destruction or removal efficiency of control device, expressed as a decimal; uncontrolled = 0

$P = (\text{ink usage, lbs/hr}) \times (\text{ink VOC content, \% by weight}) + (\text{in-line coating usage, lb/gal}) \times (\text{in-line coating usage VOC content, lb/gal})$

$$P = (42,000 \text{ lb/yr} / 8,760 \text{ hr/yr})(0.1364) + (3,960 \text{ gal/yr} / 8,760 \text{ hr/yr})(0.137 \text{ lb/gal}) = 0.72 \text{ lb VOC/hr}$$

$FS = (\text{fountain solution usage rate, gal/hr}) \times (\text{fountain solution VOC content, lbs VOC/gal})$

$$FS = (330 \text{ gal/yr} / 8,760 \text{ hr/yr})(1.88 \text{ lb/gal}) = 0.07 \text{ lb VOC/hr}$$

$CS = (\text{cleanup solvent usage rate, gal/hr}) \times (\text{cleanup solvent VOC content, lbs VOC/gal})$

$$CS = (570 \text{ gal/yr} / 8,760 \text{ hr/yr})(3.35 \text{ lb/gal}) = 0.22 \text{ lb VOC/hr}$$

Ad = mass fraction of fountain solution VOC routed to dryer;

$$Ad = 0.7$$

Af = mass fraction of fountain solution VOC emitted as fugitive;

$$Af = 0.3$$

Bd = mass fraction of cleanup solvent routed to dryer;

$$Bd = 0.0$$

Bf = mass fraction of cleanup solvent emitted as fugitive;

Bf = 0.5 (if solvent vapor pressure < 10 mm Hg at 20 deg. C (68 deg. F) and used rags are stored in closed containers)

Then:

$$S = (1-0)[0.8(0.72) + 0.7(0.07) + 0.0(0.22)] = 0.63 \text{ lb VOC/hr} = 2.75 \text{ tpy}$$

$$F = 0.3(0.07) + 0.5(0.22) = 0.13 \text{ lb VOC/hr} = 0.58 \text{ tpy}$$

S + F = 3.33 tpy VOC (potential to emit at 8,760 hours/yr of operation)

Assuming a 70% capture rate for the fountain solution, a 20% retention rate for the ink and used rags are stored in a closed container for 50% control.

Source Emissions Calculations, K011 (Heidleberg SP 102-6+L)

The Heidelber SP 102-6+L is 6-unit press capable of 6,000 impressions per hour, sheetfed printer with a maximum impression width of 28 inches. The unit is equipped with one infrared dryer. The unit uses 27,000

pounds of ink per year with a VOC content of 13.64% VOC by weight (20% VOC in ink retained by substrate/80% to dryer per Engineering guide #56). The fountain solution (Anchor Lithkemoko 2964-Emerald(R)) usage is 180 gallons per year with a VOC content of 1.88 pounds VOC/gallon (70% VOC from alcohol substitutes to dryer, 30% fugitive per Engineering guide #56). The cleanup solvents (Graphic

Arts Specialties Wash B-004) usage is 430 gallons per year with a VOC content of 3.35 pounds VOC per gallon (50% VOC in cleanup solvent for hand wash is retained in cloths, 50% emitted as fugitive, per Engineering guide #56). The in-line coatings (Coatings & Aquesives Corp 1428 A,B,BC,C,D) usage is 1,980 gallons per year with a VOC content of 0.137 pounds VOC per gallon. The usage volumes have all been increased to allow for more flexibility. There are no photochemically reactive materials used in this printer, including cleanup materials. The press is cleaned by manually wiping the unit with rags, storing the used rags in a closed container, and sending the containers off-site for laundering. The maximum operating schedule is 24 hours per day, 260 days per year (6,240 hrs/yr).

OEPA Engineering Guide #56 dated 6/15/1999 specifies how to calculate the stack and fugitive emissions from ink, fountain solution and cleanup solvent as follows.

Stack emissions, S, (lbs/hr) from the printing process:

$$S = (1 - \text{DRE})[0.8 (P) + \text{Ad} (\text{FS}) + \text{Bd} (\text{CS})]$$

Fugitive emissions, F, (lbs/hr) from printing process are:

$$F = \text{Af}(\text{FS}) + \text{Bf}(\text{CS})$$

$$\text{Total emissions} = S + F$$

where:

DRE = destruction or removal efficiency of control device, expressed as a decimal; uncontrolled = 0

P = (ink usage, lbs/hr) X (ink VOC content, % by weight) + (in-line coating usage, lb/gal) X (in-line coating usage VOC content, lb/gal)

$$P = (40,500 \text{ lb/yr} / 8,760 \text{ hr/yr})(0.1364) + (2,970 \text{ gal/yr} / 8,760 \text{ hr/yr})(0.137 \text{ lb/gal}) = 0.68 \text{ lb VOC/hr}$$

$$\text{FS} = (\text{fountain solution usage rate, gal/hr}) \times (\text{fountain solution VOC content, lbs VOC/gal})$$

$$\text{FS} = (270 \text{ gal/yr} / 8,760 \text{ hr/yr})(1.88 \text{ lb/gal}) = 0.06 \text{ lb VOC/hr}$$

$$\text{CS} = (\text{cleanup solvent usage rate, gal/hr}) \times (\text{cleanup solvent VOC content, lbs VOC/gal})$$

$$\text{CS} = (645 \text{ gal/yr} / 8,760 \text{ hr/yr})(3.35 \text{ lb/gal}) = 0.25 \text{ lb VOC/hr}$$

Ad = mass fraction of fountain solution VOC routed to dryer;
Ad = 0.7

Af = mass fraction of fountain solution VOC emitted as fugitive;
Af = 0.3

Bd = mass fraction of cleanup solvent routed to dryer;
Bd = 0.0

Bf = mass fraction of cleanup solvent emitted as fugitive;
Bf = 0.5 (if solvent vapor pressure < 10 mm Hg at 20 deg. C (68 deg. F) and used rags are stored in closed containers)

Then:

$$S = (1-0)[0.8(0.68) + 0.7(0.06) + 0.0(0.25)] = 0.59 \text{ lb VOC/hr} = 2.58 \text{ tpy}$$

$$F = 0.3(0.06) + 0.5(0.25) = 0.143 \text{ lb VOC/hr} = 0.62 \text{ tpy}$$

$$S + F = 3.2 \text{ tpy VOC (potential to emit at 8,760 hours/yr of operation)}$$

Assuming a 70% capture rate for the fountain solution, a 20% retention rate for the ink and used rags are stored in a closed container for 50% control.

Source Emissions Calculations, K012 (Manroland 906/8LV)

The Manroland 906/8LV 6-unit press capable of 7,000 impressions per hour, sheetfed printer with a maximum impression width of 51 inches. The unit is equipped with one infrared dryer. The unit uses 68,000 pounds of ink per year with a VOC content of 13.64% VOC by weight (20% VOC in ink retained by substrate/80% to dryer per Engineering guide #56). The fountain solution (Anchor Lithkemoko 2964-Emerald(R)) usage is 380 gallons per year with a VOC content of 1.88 pounds VOC/gallon (70% VOC from alcohol substitutes to dryer, 30% fugitive per Engineering guide #56). The cleanup solvents (Graphic Arts Specialties Wash B-004) usage is 480 gallons per year with a VOC content of 3.35 pounds VOC per gallon (50% VOC in cleanup solvent for hand wash is retained in cloths, 50% emitted as fugitive, per Engineering guide #56). The in-line coatings (Coatings & Aquesives Corp 1428 A,B,BC,C,D) usage is 7,480 gallons per year with a VOC content of 0.137 pounds VOC per gallon. The usage volumes have all been increased to allow for more flexibility. There are no photochemically reactive materials used in this printer, including cleanup materials. The press is cleaned by manually wiping the unit with rags, storing the used rags in a closed container, and sending the containers off-site for laundering. The maximum operating schedule is 24 hours per day, 260 days per year (6,240 hrs/yr).

OEPA Engineering Guide #56 dated 6/15/1999 specifies how to calculate the stack and fugitive emissions from ink, fountain solution and cleanup solvent as follows.

Stack emissions, S, (lbs/hr) from the printing process:

$$S = (1 - \text{DRE})[0.8 (P) + \text{Ad} (\text{FS}) + \text{Bd} (\text{CS})]$$

Fugitive emissions, F, (lbs/hr) from printing process are:

$$F = \text{Af}(\text{FS}) + \text{Bf}(\text{CS})$$

Total emissions = S + F

where:

DRE = destruction or removal efficiency of control device, expressed as a decimal; uncontrolled = 0

P = (ink usage, lbs/hr) X (ink VOC content, % by weight) + (in-line coating usage, lb/gal) X (in-line coating usage VOC content, lb/gal)

$P = (102,000 \text{ lb/yr} / 8,760 \text{ hr/yr})(0.1364) + (11,220 \text{ gal/yr} / 8,760 \text{ hrs/yr})(0.137 \text{ lb/gal}) = 1.8 \text{ lb VOC/hr}$

FS = (fountain solution usage rate, gal/hr) X (fountain solution VOC content, lbs VOC/gal)

$FS = (570 \text{ gal/yr} / 8,760 \text{ hr/yr})(1.88 \text{ lb/gal}) = 0.12 \text{ lb VOC/hr}$

CS = (cleanup solvent usage rate, gal/hr) X (cleanup solvent VOC content, lbs VOC/gal)

$CS = (720 \text{ gal/yr} / 8,760 \text{ hr/yr})(3.35 \text{ lb/gal}) = 0.28 \text{ lb VOC/hr}$

Ad = mass fraction of fountain solution VOC routed to dryer;

Ad = 0.7

Af = mass fraction of fountain solution VOC emitted as fugitive;

Af = 0.3

Bd = mass fraction of cleanup solvent routed to dryer;

Bd = 0.0

Bf = mass fraction of cleanup solvent emitted as fugitive;

Bf = 0.5 (if solvent vapor pressure < 10 mm Hg at 20 deg. C (68 deg. F) and used rags are stored in closed containers)

Then:

$S = (1-0)[0.8(1.8) + 0.7(0.12) + 0.0(0.28)] = 1.5 \text{ lb VOC/hr} = 6.57 \text{ tpy}$

$F = 0.3(0.12) + 0.5(0.28) = 0.17 \text{ lb VOC/hr} = 0.7 \text{ tpy}$

$S + F = 7.27 \text{ tpy VOC (potential to emit at 8,760 hours/yr of operation)}$

Assuming a 70% capture rate for the fountain solution, a 20% retention rate for the ink and used rags are stored in a closed container for 50% control.

Engineering Guide #56 requires that emissions from a dryer, which are always vented directly through a stack, should be treated as organic materials (both vapor and liquid aerosol phases) and particulate matter. There are particulate emissions from the dryer due to condensable organic material (and fuel combustion - e.g. natural gas, fuel oil and/or recovered ink oil - if applicable). Once the printed material has exited the dryer, any further emissions are organic materials. Engineering Guide #56 states that OAC rule 3745-17-07 is applicable to heatset web offset printing lines (HWOPLs). The guide also states that OAC rule 3745-17-11 applies to HWOPLs. However, HWOPLs should meet the requirements of OAC rule 3745-17-11 without any additional control measures. Limited stack test data suggests that the uncontrolled mass rate of emission (UMRE) is less than 10 lbs/hr (in which case Figure II of the rule would not apply) and that the limitation of Table I of the rule is achieved.

Emissions Summary

	K010 (lb/hr)	K010 (PTE tpy)	K011 (lb/hr)	K011 (PTE tpy)	K012 (lb/hr)	K012 (PTE, tpy)
Inks & Varnishes, In-line Coatings (80% Stack emissions, 20% retained by substrate)	0.58	2.54	0.54	2.36	1.4	6.13
Fountain Solution Additives (70% Stack emissions)	0.05	0.22	0.04	0.18	0.084	0.37
Clean up solvents (0% Stack emissions, 50% retained by cloths, per Engineering Guide #56)	0	0	0	0	0	0
Fountain Solution Additives (30% Fugitive emissions)	0.02	0.09	0.02	0.09	0.036	0.16
Clean up solvents (50% Fugitive emissions, 50% retained by cloths)	0.11	0.48	0.13	0.57	0.14	0.61
Total VOC emissions from each emissions unit	0.76	3.33	0.73	3.2	1.66	7.27
Total facility emissions (PTE, tpy)	13.8 tpy (K010-K012, combined)					

Because the facility has requested that these VOC emission limitations be made federally enforceable, this permit will be issued draft-final.

5. Conclusion:

Because the facility has requested that these VOC emission limitations be made federally enforceable under PTI 04-01499, issued 5/6/2008, this FEPTIO will also be issued draft-final.

6. Please provide additional notes or comments as necessary:

None

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	13.8



**State of Ohio Environmental Protection Agency
Division of Air Pollution Control**

DRAFT

**Air Pollution Permit-to-Install and Operate
for
CENVEO**

Facility ID: 0448011240
Permit Number: P0103863
Permit Type: Renewal
Issued: 10/1/2008
Effective: To be entered upon final issuance
Expiration: To be entered upon final issuance



Air Pollution Permit-to-Install and Operate
for
CENVEO

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State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0103863

Facility ID: 0448011240

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0448011240

Application Number(s): A0035945

Permit Number: P0103863

Permit Description: FEPTIO for 3 printing lines formerly PTI 04-01499, issued 5/6/2008.

Permit Type: Renewal

Permit Fee: \$0.00 *DO NOT send payment at this time - subject to change before final issuance*

Issue Date: 10/1/2008

Effective Date: To be entered upon final issuance

Expiration Date: To be entered upon final issuance

Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

CENVEO
1635 COINING DR.
Toledo, OH 43612

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Toledo Department of Environmental Services
348 South Erie Street
Toledo, OH 43604
(419)936-3015

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0103863

Facility ID: 0448011240

Effective Date: To be entered upon final issuance

Authorization (continued)

Permit Number: P0103863

Permit Description: FEPTIO for 3 printing lines formerly PTI 04-01499, issued 5/6/2008.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	K010
Company Equipment ID:	K010
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K011
Company Equipment ID:	K011
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K012
Company Equipment ID:	K012
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0103863

Facility ID: 0448011240

Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions



1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is



very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.



10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Toledo Department of Environmental Services in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.



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14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



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B. Facility-Wide Terms and Conditions



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0103863

Facility ID: 0448011240

Effective Date: To be entered upon final issuance

1. 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).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.



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C. Emissions Unit Terms and Conditions



1. K010, Heidelberg CD102-6+L Perfector Sheetfed Printing Press

Operations, Property and/or Equipment Description:

Heidelberg CD102-6+L Perfector Sheetfed Printing Press

a) 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.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)(a)(ii) (PTI 04-01499, issued 5/6/2008)	See b)(2)a.
b.	OAC rule 3745-31-05(D)	Volatile organic compound (VOC) emissions shall not exceed 0.76 pound per hour and 3.33 tons per year, as a rolling, 12-month summation of the monthly emissions; and see b)(2)b.
c.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions, from all stacks serving this emissions unit, shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
d.	OAC rule 3745-17-11(B)	Particulate emissions shall not exceed 0.551 pound per hour; and see b)(2)c.



(2) Additional Terms and Conditions

- a. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE and VOC emissions from this air contaminant source since the uncontrolled potential to emit for PE and VOC emissions is less than ten tons per year.
- b. Permit to Install 04-01499 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purposes of avoiding BAT requirements under OAC rule 3745-31-05(A)(3)(b):

Printing inks: 42,000 lbs/year, with a maximum of 13.64% VOC by weight.

Fountain solution: 570 gals/year, with a maximum VOC content of 1.88 lbs/gal.

Coatings: 3,960 gals/year, with a maximum VOC content of 0.137 lb/gal.

Clean-up Material: 570 gals/year, with a maximum density of 3.35 lbs/gal.

All clean-up solvent in this emissions unit shall have a vapor pressure less than 10 mmHg at a temperature of 68 F and all used clean-up rags and cleaning materials shall be stored in closed containers.

- c. The uncontrolled mass rate of particulate emissions from this emissions unit should be less than 10 pounds per hour per Engineering Guide #56. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for this emissions unit:
 - a. the name and identification number of each material employed (i.e. printing inks, fountain solution, coatings, clean-up material);
 - b. the VOC content in either percent by weight or pounds per gallon as specified in b)(2)b. for each material employed; and
 - c. the amount of each material employed in either pounds or gallons, as specified in b)(2)b. for each material employed.

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



- (2) Modeling to demonstrate compliance with, the AToxic Air Contaminant Statute², ORC 3704.03(F)(4)(b), was not necessary because the emissions unit=s maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. 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 cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the Potential to Emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

The permittee shall submit quarterly deviation (excursion) reports to the Toledo Division of Environmental Services in writing which identify exceedances of all monthly records which show that the material usage or composition exceeds the limitations specified in b)(2)b.
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted (postmarked) each year by the thirty-first of January (covering October to December), the thirtieth of April (covering January to March), the thirty-first of July (covering April to June), and the thirty-first of October (covering July to September), unless an alternative schedule has been established and approved by the director (the appropriate district office or local air agency).

- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the following emission limitations shall be determined in accordance with the following method(s):



a. Emission Limitation:

VOC emissions shall not exceed 0.76 pound per hour.

Applicable compliance method:

This emission limitation was based on the maximum combined stack and fugitive emissions from ink, fountain solution, coatings, and clean-up solvent using the calculation method specified in Ohio EPA Engineering Guide #56 dated June 15, 1999. If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A to determine stack emissions. Use of Method 25 or 25A is to be selected based on the results of pre-survey stack sampling and U.S. EPA guidance documents. Method 24 of 40 CFR Part 60, Appendix A shall be used to determine the VOC content of the liquid organic materials used. Using the Engineering Guide #56 calculation, add the hourly fugitive emissions based on the actual liquid organic material usage during the stack emissions testing to the stack emission rate to determine the hourly VOC emissions from the line. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

b. Emission Limitation:

VOC emissions shall not exceed 3.33 tpy, as a rolling, 12-month summation.

Applicable Compliance Method:

This emission limitation was based on the combined stack and fugitive emissions using the calculation contained in Engineering Guide #56 and the record-keeping requirements contained in d)(1). Compliance with b)(2)b. shall serve as demonstration of compliance with the annual emission limitation.

c. Emission Limitation:

20 percent opacity, as a 6-minute average

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A.

d. Emission Limitation:

PE shall not exceed 0.551 pound per hour.

Applicable Compliance Method:

Per Engineering Guide #56, this emissions unit should meet this standard without any additional control measures.



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If required, the permittee shall demonstrate compliance with this emissions limitation through emission testing performed in accordance with Methods 1 through 5 of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(10). Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

g) Miscellaneous Requirements

- (1) None.



2. K011, Heidelberg SP 102-6+L Sheetfed Printing Press

Operations, Property and/or Equipment Description:

Heidelberg SP 102-6+L Sheetfed Printing Press

a) 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.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)(a)(ii) (PTI 04-01499, issued 5/6/2008)	See b)(2)a.
b.	OAC rule 3745-31-05(D)	Volatile organic compound (VOC) emissions shall not exceed 0.73 pound per hour and 3.2 tons per year, as a rolling, 12-month summation of the monthly emissions; and see b)(2)b.
c.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions, from all stacks serving this emissions unit, shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
d.	OAC rule 3745-17-11(B)	Particulate emissions shall not exceed 0.551 pound per hour; and see b)(2)c.



(2) Additional Terms and Conditions

- a. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE and VOC emissions from this air contaminant source since the uncontrolled potential to emit for PE and VOC emissions is less than ten tons per year.
- b. Permit to Install 04-01499 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purposes of avoiding BAT requirements under OAC rule 3745-31-05(A)(3)(b):

Printing inks: 40,500 lbs/year, with a maximum of 13.64% VOC by weight.

Fountain solution: 270 gals/year, with a maximum VOC content of 1.88 lbs/gal.

Coatings: 2,970 gals/year, with a maximum VOC content of 0.137 lb/gal.

Clean-up Material: 645 gals/year, with a maximum density of 3.35 lbs/gal.

All clean-up solvent in this emissions unit shall have a vapor pressure less than 10 mmHg at a temperature of 68 F and all used clean-up rags and cleaning materials shall be stored in closed containers.

- c. The uncontrolled mass rate of particulate emissions from this emissions unit should be less than 10 pounds per hour per Engineering Guide #56. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for this emissions unit:
 - a. the name and identification number of each material employed (i.e. printing inks, fountain solution, coatings, clean-up material);
 - b. the VOC content in either percent by weight or pounds per gallon as specified in b)(2)b for each material employed; and
 - c. the amount of each material employed in either pounds or gallons, as specified in b)(2)b for each material employed.

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



- (2) Modeling to demonstrate compliance with, the AToxic Air Contaminant Statute², ORC 3704.03(F)(4)(b), was not necessary because the emissions unit=s maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. 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 cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the Potential to Emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

The permittee shall submit quarterly deviation (excursion) reports to the Toledo Division of Environmental Services in writing which identify exceedances of all monthly records which show that the material usage or composition exceeds the limitations specified in b)(2)b.
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted (postmarked) each year by the thirty-first of January (covering October to December), the thirtieth of April (covering January to March), the thirty-first of July (covering April to June), and the thirty-first of October (covering July to September), unless an alternative schedule has been established and approved by the director (the appropriate district office or local air agency).

- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the following emission limitations shall be determined in accordance with the following method(s):



a. Emission Limitation:

VOC emissions shall not exceed 0.73 pound per hour.

Applicable compliance method:

This emission limitation was based on the maximum combined stack and fugitive emissions from ink, fountain solution, coatings, and clean-up solvent using the calculation method specified in Ohio EPA Engineering Guide #56 dated June 15, 1999. If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A to determine stack emissions. Use of Method 25 or 25A is to be selected based on the results of pre-survey stack sampling and U.S. EPA guidance documents. Method 24 of 40 CFR Part 60, Appendix A shall be used to determine the VOC content of the liquid organic materials used. Using the Engineering Guide #56 calculation, add the hourly fugitive emissions based on the actual liquid organic material usage during the stack emissions testing to the stack emission rate to determine the hourly VOC emissions from the line. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

b. Emission Limitation:

VOC emissions shall not exceed 3.2 tpy, as a rolling, 12-month summation.

Applicable Compliance Method:

This emission limitation was based on the combined stack and fugitive emissions using the calculation contained in Engineering Guide #56 and the record-keeping requirements contained in d)(1). Compliance with b)(2)b. shall serve as demonstration of compliance with the annual emission limitation.

c. Emission Limitation:

20 percent opacity, as a 6-minute average

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A.

d. Emission Limitation:

PE shall not exceed 0.551 pound per hour.

Applicable Compliance Method:

Per Engineering Guide #56, this emissions unit should meet this standard without any additional control measures.



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If required, the permittee shall demonstrate compliance with this emissions limitation through emission testing performed in accordance with Methods 1 through 5 of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(10). Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

g) Miscellaneous Requirements

- (1) None.



3. K012, Manroland 906/8LV Sheetfed Printing Press

Operations, Property and/or Equipment Description:

Manroland 906/8LV Sheetfed Printing Press

a) 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.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)(a)(ii) (PTI 04-01499, issued 5/6/2008)	See b)(2)a.
b.	OAC rule 3745-31-05(D)	Volatile organic compound (VOC) emissions shall not exceed 1.66 pounds per hour and 7.27 tons per year, as a rolling, 12-month summation of the monthly emissions; and see b)(2)b.
c.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions, from all stacks serving this emissions unit, shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
d.	OAC rule 3745-17-11(B)	Particulate emissions shall not exceed 0.551 pound per hour; and see b)(2)c.



(2) Additional Terms and Conditions

- a. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE and VOC emissions from this air contaminant source since the uncontrolled potential to emit for PE and VOC emissions is less than ten tons per year.
- b. Permit to Install 04-01499 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purposes of avoiding BAT requirements under OAC rule 3745-31-05(A)(3)(b):

Printing inks: 102,000 lbs/year, with a maximum of 13.64% VOC by weight.

Fountain solution: 220 gals/year, with a maximum VOC content of 1.88 lbs/gal.

Coatings: 11,220 gals/year, with a maximum VOC content of 0.137 lb/gal.

Clean-up Material: 720 gals/year, with a maximum density of 3.35 lbs/gal.

All clean-up solvent in this emissions unit shall have a vapor pressure less than 10 mmHg at a temperature of 68 F and all used clean-up rags and cleaning materials shall be stored in closed containers.

- c. The uncontrolled mass rate of particulate emissions from this emissions unit should be less than 10 pounds per hour per Engineering Guide #56. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for this emissions unit:
 - a. the name and identification number of each material employed (i.e. printing inks, fountain solution, coatings, clean-up material);
 - b. the VOC content in either percent by weight or pounds per gallon as specified in b)(2)b. for each material employed; and
 - c. the amount of each material employed in either pounds or gallons, as specified in b)(2)b. for each material employed.

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



- (2) Modeling to demonstrate compliance with, the AToxic Air Contaminant Statute², ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. 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 cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the Potential to Emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

The permittee shall submit quarterly deviation (excursion) reports to the Toledo Division of Environmental Services in writing which identify exceedances of all monthly records which show that the material usage or composition exceeds the limitations specified in b)(2)b.
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted (postmarked) each year by the thirty-first of January (covering October to December), the thirtieth of April (covering January to March), the thirty-first of July (covering April to June), and the thirty-first of October (covering July to September), unless an alternative schedule has been established and approved by the director (the appropriate district office or local air agency).

- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the following emission limitations shall be determined in accordance with the following method(s):



a. Emission Limitation:

VOC emissions shall not exceed 1.66 pounds per hour.

Applicable compliance method:

This emission limitation was based on the maximum combined stack and fugitive emissions from ink, fountain solution, coatings, and clean-up solvent using the calculation method specified in Ohio EPA Engineering Guide #56 dated June 15, 1999. If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A to determine stack emissions. Use of Method 25 or 25A is to be selected based on the results of pre-survey stack sampling and U.S. EPA guidance documents. Method 24 of 40 CFR Part 60, Appendix A shall be used to determine the VOC content of the liquid organic materials used. Using the Engineering Guide #56 calculation, add the hourly fugitive emissions based on the actual liquid organic material usage during the stack emissions testing to the stack emission rate to determine the hourly VOC emissions from the line. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

b. Emission Limitation:

VOC emissions shall not exceed 7.27 tpy, as a rolling, 12-month summation.

Applicable Compliance Method:

This emission limitation was based on the combined stack and fugitive emissions using the calculation contained in Engineering Guide #56 and the record-keeping requirements contained in d)(1). Compliance with b)(2)b. shall serve as demonstration of compliance with the annual emission limitation.

c. Emission Limitation:

20 percent opacity, as a 6-minute average

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A.

d. Emission Limitation:

PE shall not exceed 0.551 pound per hour.

Applicable Compliance Method:

Per Engineering Guide #56, this emissions unit should meet this standard without any additional control measures.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0103863

Facility ID: 0448011240

Effective Date: To be entered upon final issuance

If required, the permittee shall demonstrate compliance with this emissions limitation through emission testing performed in accordance with Methods 1 through 5 of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(10). Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

g) Miscellaneous Requirements

- (1) None.