



State of Ohio Environmental Protection Agency

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Columbus, OH 43216-1049

2/10/2009

JIM ELSASS  
CENVEO INC  
829 VANDEMARK RD  
Sidney, OH 45365

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE  
Facility ID: 0575010205  
Permit Number: P0104230  
Permit Type: Renewal  
County: Shelby

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:

Enclosed please find a final Air Pollution Permit-to-Install and Operate ("PTIO") which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully.

Ohio EPA maintains a document entitled "Frequently Asked Questions about the PTIO". The document can be downloaded from the DAPC Web page, [www.epa.state.oh.us/dapc](http://www.epa.state.oh.us/dapc), from the "Permits" link. This document contains additional information related to your permit, such as what activities are covered under the PTIO, who has enforcement authority over the permit and Ohio EPA's authorization to inspect your facility and records. Please contact the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469 if you need assistance.

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission ("ERAC") under Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and describe the action complained of and the grounds for the appeal. The appeal must be filed with the ERAC within thirty (30) days after notice of the Director's action. A filing fee of \$70.00 must be submitted to the ERAC with the appeal, although the ERAC, has discretion to reduce the amount of the filing fee if you can demonstrate (by affidavit) that payment of the full amount of the fee would cause extreme hardship. If you file an appeal of this action, you must notify Ohio EPA of the filing of the appeal (by providing a copy to the Director) within three (3) days of filing your appeal with the ERAC. Ohio EPA requests that a copy of the appeal also be provided to the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the ERAC at the following address:

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, OH 43215

If you have any questions regarding this permit, please contact the Ohio EPA DAPC, Southwest District Office. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page [www.epa.state.oh.us/dapc](http://www.epa.state.oh.us/dapc).

Sincerely,

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

Cc: Ohio EPA-SWDO

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





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

**FINAL**

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

Facility ID: 0575010205  
Permit Number: P0104230  
Permit Type: Renewal  
Issued: 2/10/2009  
Effective: 2/10/2009  
Expiration: 10/2/2018





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

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**Final Permit-to-Install and Operate**  
**Permit Number:** P0104230  
**Facility ID:** 0575010205  
**Effective Date:** 2/10/2009

# Authorization

Facility ID: 0575010205  
Application Number(s): A0036259  
Permit Number: P0104230  
Permit Description: Renewal of expired PTO for EU R006, Mark V Offset/Heatset Half Web Pressl.  
Permit Type: Renewal  
Permit Fee: \$0.00  
Issue Date: 2/10/2009  
Effective Date: 2/10/2009  
Expiration Date: 10/2/2018  
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

CENVEO INC  
829 VANDEMARK RD.  
Sidney, OH 45365

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:

Ohio EPA DAPC, Southwest District Office  
401 East Fifth Street  
Dayton, OH 45402  
(937)285-6357

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

**Final Permit-to-Install and Operate**

**Permit Number:** P0104230

**Facility ID:** 0575010205

**Effective Date:** 2/10/2009

## Authorization (continued)

Permit Number: P0104230

Permit Description: Renewal of expired PTO for EU R006, Mark V Offset/Heatset Half Web Pressl.

Permits for the following emissions unit(s) or groups of emissions units are in this document as indicated below:

<b>Emissions Unit ID:</b>	<b>R006</b>
Company Equipment ID:	Mark V Printing Press
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



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**Permit Number:** P0104230

**Facility ID:** 0575010205

**Effective Date:** 2/10/2009

## **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 Ohio EPA DAPC, Southwest District Office 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



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change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

**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.



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

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## **B. Facility-Wide Terms and Conditions**



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Division of Air Pollution Control

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**Effective Date:** 2/10/2009

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.



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install and Operate**

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**Effective Date:** 2/10/2009

## **C. Emissions Unit Terms and Conditions**



**1. R006, Mark V Printing Press**

**Operations, Property and/or Equipment Description:**

Mark V Offset/Heatset half web press with regenerative thermal oxidizer (RTO).

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 and (PTI 05-5447)	<p>208.5 pounds per day ("lbs/day") organic compounds ("OC"), including any fugitive emissions.</p> <p>38.1 tons per year ("TPY") OC, including any fugitive emissions.</p> <p>Natural gas combustion emissions shall not exceed the following for the regenerative thermal oxidizer serving emissions unit R006:</p> <p>0.37 lbs/day particulates 0.03 lbs/day SO<sub>2</sub> 4.9 lbs/day NO<sub>x</sub> 4.1 lbs/day CO</p> <p>This emissions unit shall incorporate the use of a regenerative thermal oxidizer with a destruction efficiency of at least 90%.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See b)(2)a through b)(2)e.
b.	OAC rule 3745-17-07	Visible particulate emissions coming from the incinerator stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
c.	OAC rule 3745-21-07(G)(2)	The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).  See b)(2)f.
d.	OAC rule 3745-21-07(G)(6)	The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).  See b)(2)f.
e.	OAC rule 3745-17-11	The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

- a. Emissions from natural gas combustion in the dryer are exempt from regulation per OAC rule 3745-31-03(A)(1)(c).
- b. The OC content of the inks employed in this emissions unit shall not exceed 40%, by weight.
- c. The OC content of the dampening solution employed in this emissions unit shall not exceed 1.96 pounds per gallon.
- d. The OC content of the organic cleanup material employed in this emissions unit shall not exceed 6.68 pounds per gallon.
- e. The OC emissions from emissions unit R006 shall not exceed 10.0 pounds per hour (controlled, from the incinerator for the emissions unit dryer oven).
- f. On February 18, 2008, OAC rule 3745-21-07 was revised to delete paragraph (G); therefore, paragraph (G) is no longer part of the State regulations. However, that rule revision has not been approved by the U.S.EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs to OAC rule 3745-21-07, the requirement of the previous OAC rule 3745-21-07(G) still exists as part of the federally approved SIP for Ohio.

Once the February 18, 2008, revised OAC rule 3745-21-07, or modified version of OAC rule 3745-21-07 is approved by the U.S. EPA and Ohio's State



Implementation Plan (SIP) is revised, the terms and conditions within this permit which are required by previous OAC rule 3745-21-07(G) will not be required and will not be federally and/or state enforceable.

Once the February 18, 2008, revised OAC rule 3745-21-07, or modified version of OAC rule 3745-21-07 is approved by the U.S. EPA and Ohio's State Implementation Plan (SIP) is revised, the permittee shall take immediate steps to assure compliance with any and all requirements of the revised OAC rule and/or SIP.

c) Operational Restrictions

- (1) All OC emissions venting from the dryer oven shall be reduced by the use of the RTO.
- (2) The dryer oven and RTO for this emissions unit shall only employ natural gas as fuel.
- (3) The maximum ink usage in this emissions unit shall not exceed 160 pounds per hour and 3840 lbs/day.
- (4) The maximum dampening solution usage in this emissions unit shall not exceed 12 gallons per day and 4,380 gallons per year.
- (5) The maximum organic cleanup material usage in this emissions unit shall not exceed 8 gallons per day and 2,920 gallons per year.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the actual operating temperature of the thermal oxidizer during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the thermal oxidizer actual operating temperature on an 3-hour blocks of time basis.

Whenever the 3-hour blocks of time average temperature monitored value deviates by more than 50 degrees from the specified operating temperature, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began and magnitude of the deviation at that time,
- b. the date(s) the investigation was conducted, the name of the personnel who conducted the investigation, and
- c. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable operating temperature as specified below, unless the permittee determines that corrective action is not necessary and documents the reasons



for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- a. a description of corrective action,
  - b. the date it was completed,
  - c. the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation,
  - d. the 3-hour blocks of time average temperature that was measured after the corrective action, and
  - e. name(s) of the personnel who performed the work.
- (2) The permittee shall collect and record the following information each month for this emissions unit:
- a. the company identification for each ink, dampening solution and cleanup material employed in this emissions unit;
  - b. the total amount of each ink employed by this emissions unit, in pounds (monthly and year-to-date("YTD"));
  - c. the total amount of each dampening solution employed by this emissions unit, in gallons (monthly and YTD);
  - d. the total amount of each cleanup material employed by this emissions unit, in gallons (monthly and YTD);
  - e. the OC content of each ink employed by this emissions unit, in percent by weight;
  - f. the OC content of each dampening solution employed by this emissions unit, in pounds per gallon;
  - g. the OC content of each cleanup material employed by this emissions unit, in pounds per gallon;
  - h. the total number of hours the emissions unit was in operation;
  - i. the total number of days the emissions unit was in operation;
  - j. the total amount of all inks employed by this emissions unit, i.e., the sum of the amounts of all inks listed in d)(2)b (monthly);
  - k. the average amount of all inks employed by this emissions unit, in pounds per hour, i.e., d)(2)j (monthly)/d)(2)h;
  - l. the average amount of all inks employed by this emissions unit, in lbs/day, i.e., d)(2)j (monthly)/d)(2)i;



- m. the average amount of all dampening solution employed by this emissions unit, in gallons per day, i.e., the sum of all the dampening solutions listed in d)(2)c (monthly)/d)(2)i;
- n. the average amount of all cleanup material employed by this emissions unit, in gallons per day, i.e., the sum of all cleanup materials listed in d)(2)g (monthly)/d)(2)i;
- o. the uncontrolled OC emission rate from the dryer oven for all inks, in pounds, i.e., the sum of the amount of each ink listed in d)(2)b (monthly) multiplied by its associated OC content listed in d)(2)e, multiplied by (0.8)\*;
- p. the uncontrolled OC emission rate from the dryer oven for all dampening solutions, in pounds, i.e., the sum of the amount of each dampening solution listed in d)(2)f (monthly) multiplied by its associated OC content listed in d)(2)f, multiplied by (0.7)\*;
- q. the total uncontrolled OC emission rate from the dryer oven, in pounds, i.e., [d)(2)o + d)(2)p];
- r. the uncontrolled average OC emission rate from the dryer oven, in lbs/day, i.e., [d)(2)q/d)(2)i];
- s. the total fugitive OC emission rate for all dampening solutions, in pounds, i.e., the sum of the amount of each dampening solution listed in d)(2)c (monthly) multiplied by its associated OC content listed in d)(2)f, multiplied by (0.3)\*;
- t. the total fugitive OC emission rate for all cleanup materials, in pounds, i.e., the sum of the amount of each cleanup materials listed in d)(2)d (monthly) multiplied by its associated OC content listed in d)(2)g, multiplied by (0.5)\*;
- u. the total fugitive OC emission rate, in pounds, i.e., [d)(2)s + d)(2)t];
- v. the total fugitive OC emission rate, in lbs/day, i.e., [d)(2)u/d)(2)i];
- w. the total OC emissions from the incinerator, in pounds, i.e., [d)(2)q x (1 - 0.973)\*\*];
- x. the total average OC emissions from the incinerator, in pounds per hour, i.e., [d)(2)w/d)(2)h];
- y. the total average OC emissions from the incinerator, in lbs/day, i.e., [d)(2)w/d)(2)i];
- z. the total average OC emissions (fugitive and controlled), in lbs/day, i.e., [d)(2)v + d)(2)y];
- aa. the total OC emissions (fugitive and controlled), in tons YTD, i.e., the sum of [d)(2)u + d)(2)w] for each past month of the calendar year/2000 lbs/ton;
- bb. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation; and



- cc. all 3-hour blocks of time during which the average temperature within the thermal oxidizer, when the emissions unit was in operation, was below 1400 degrees Fahrenheit.

\* Per DAPC guidance, the following assumptions will be used in calculating the OC emissions for this emissions unit: 20 percent (by weight) of the solvent in the inks is retained in the web after the dryer. The remaining 80 percent (by weight) of the OCs in the inks is vented to the catalytic incinerator. 30 percent of the dampening solution emissions is fugitive, and 70 percent is vented to the catalytic incinerator. The cleanup operations can assume 50 percent of the solvent is retained in the cloths and 50 percent is emitted as fugitive, if the cleanup cloths are stored in a closed container and the solvent has a vapor pressure of 10mm Hg or lower at 20 degrees Celsius (68 deg. F.).

\*\* A destruction efficiency of 97.3 % was determined by the most recent performance test at the time of permit issuance. The decimal equivalent to the latest destruction efficiency testing required in Section f)(3) of this permit will be used in place of the 0.973 in this equation for future OC incinerator emissions calculations.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports to Ohio EPA Southwest District Office ("SWDO") in writing of all records showing the following:
  - a. the use of ink(s) with greater than 40% ,by weight, OC content;
  - b. the use of dampening solution(s) with greater than 1.33 pounds per gallon OC content;
  - c. the use of cleanup material(s) with greater than 6.68 pounds per gallon of OC content; and
  - d. all 3-hour blocks of time during which the average temperature within the thermal oxidizer, when the emissions unit was in operation, was below 1400 degrees Fahrenheit.

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) The permittee shall notify Ohio EPA Southwest District Office in writing of each monthly record showing any exceedances of the following:
  - a. 156.8 lbs/day total average OC emissions;
  - b. 10.0 lbs/hr total average OC emissions from the RTO; and



- c. 12 gallons per day of dampening solution, 8 gallons per day of organic cleanup material, and/or 103.3 pounds per hour or 2479.2 pounds per day of ink are employed.
  - d. The notification shall include a copy of such record and shall be sent to Ohio EPA, Southwest District Office ("SWDO"), within 30 days following the end of the calendar month.
- (3) 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 emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
- Emission Limitation:
- 208.5 lbs/day total OC emissions, fugitive and controlled
- Applicable Compliance Method:
- Compliance shall be demonstrated based upon the record keeping specified in Section d)(2)z.
- Emission Limitation:
- 38.1 tons per year total OC emissions, fugitive and controlled
- Applicable Compliance Method:
- Compliance shall be demonstrated based upon the record keeping specified in Sections d)(2)aa.
- Emission Limitation:
- 0.37 lbs/day particulates
- Applicable Compliance Method:
- Compliance shall be demonstrated based upon the AP-42 particulate emission factor of 1.9 lbs of particulates/million standard cubic feet ("MSCF") multiplied by the annual natural gas usage, in standard cubic feet, and divided by the number of days the emissions unit was operational during the year.
- Emission Limitation:
- 0.03 lbs/day SO<sub>2</sub>



Applicable Compliance Method:

Compliance shall be demonstrated based upon the AP-42 SO<sub>2</sub> emission factor of 0.60 lbs of SO<sub>2</sub>/MSCF multiplied by the annual natural gas usage, in standard cubic feet, and divided by the number of days the emissions unit was operational during the year.

Emission Limitation:

4.9 lbs/day NO<sub>x</sub>

Applicable Compliance Method:

Compliance shall be demonstrated based upon the AP-42 NO<sub>x</sub> emission factor of 100.00 lbs of NO<sub>x</sub>/MSCF multiplied by the annual natural gas usage, in standard cubic feet, and divided by the number of days the emissions unit was operational during the year.

Emission Limitation:

4.1 lbs/day CO

Applicable Compliance Method:

Compliance shall be demonstrated based upon the AP-42 CO emission factor of 84.00 lbs CO/MSCF multiplied by the annual natural gas usage, in standard cubic feet, and divided by the number of days the emissions unit was operational during the year.

Emission Limitation:

This emissions unit will incorporate the use of a regenerative thermal oxidizer with a destruction efficiency of at least 90%.

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with USEPA Reference Method 25 or 25A (40 CFR Part 60, Appendix A), and the test methods and procedures specified in OAC rule 3745-21-10.

Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be determined by visible emission evaluations performed in accordance with the procedures specified in USEPA Reference Method 9 (40 CFR Part 60, Appendix A).

Emission Limitation:

160 lbs/hr maximum average ink usage rate

840 lbs/day maximum daily average ink usage rate



Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping specified in Sections d)(2)k and d)(2)l.

Emission Limitation:

12 gallons per day maximum average dampening solution usage rate

4380 gallons per year maximum dampening solution usage

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping specified in Sections d)(2)m and d)(2)c.

Emission Limitation:

8 gallons per day maximum average OC cleanup material usage

2920 gallons per year maximum OC cleanup material usage

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping specified in Sections d)(2)n and d)(2)d.

Emission Limitation:

10.0 lbs OC/hr (controlled, from the RTO)

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping specified in Section d)(2)x.

Emission Limitation:

The OC content of ink employed in this emissions unit shall not exceed 40% by weight.

The OC content of the dampening solution employed in this emissions unit shall not exceed 1.96 pounds per gallon.

The OC content of the cleanup material employed in this emissions unit shall not exceed 6.68 pounds per gallon.

Applicable Compliance Method:

Compliance shall be demonstrated based upon manufacturer formulation data or USEPA Method 24 (40 CFR Part 60, Appendix A) testing.

- (2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:



- a. The emissions testing shall be conducted within 6 months prior to permit expiration.
  - b. The emissions testing shall be conducted to demonstrate compliance with the destruction efficiency limitation for organic compounds.
  - c. The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
  - d. the destruction efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with Method 25 or 25A of 40 CFR Part 60, Appendix A, and the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
- (3) Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

g) **Miscellaneous Requirements**

- (1) None.