



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL CERTIFIED MAIL
FAIRFIELD COUNTY**

Street Address:

122 S. Front Street

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 01-08093

DATE: 2/16/00

The Cyril-Scott Company
Bob Wilson
PO Box 310
Lancaster, OH 43130

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: USEPA

CDO



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install

Issue Date: 2/16/00

FINAL PERMIT TO INSTALL 01-08093

Application Number: 01-08093
APS Premise Number: 0123010198
Permit Fee: **\$200**
Name of Facility: The Cyril-Scott Company
Person to Contact: Bob Wilson
Address: PO Box 310
Lancaster, OH 43130

Location of proposed air contaminant source(s) [emissions unit(s)]:
3950 Lancaster New Lexington Rd
Lancaster, Ohio

Description of proposed emissions unit(s):
Goss heatset web offset printing press with catalytic incinerator.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency



Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized

representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio

Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities prove to be inadequate or cannot meet applicable standards.

10. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

11. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit to Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

The Cyril-Scott Company
PTI Application: 01-08093
Issued: 2/16/00

Facility ID: 0123010198

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
PM	.293
OC	23.42
CO	2.05
NO _x	2.444
SO ₂	.0145

PART II: SPECIAL TERMS AND CONDITIONS

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
GOSS Model G18 heatset web offset printing press controlled by a catalytic incinerator	OAC rule 3745-31-05(A)(3)	Particulate emissions shall not exceed 0.067 lb/hr and 0.29 ton/yr.
		Sulfur Dioxide emissions shall not exceed .0033 lb/hr and 0.015 ton /yr.
		Organic compound emissions shall not exceed 5.35 lbs/hr and 23.42 tons /yr.
		Carbon Monoxide emissions shall not exceed 0.468 lb/hr and 2.05 ton /yr..
		Nitrogen Oxide emissions shall not exceed 0.56 lb/hr and 2.44 tons/yr.
	See A.2.b below	
	OAC rule 3745-17-07(A)(1)	Opacity shall not exceed 20 percent as a six minute average, except as provided by rule.
	OAC rule 3745-17-11(B)(1)	The limits established by this rule are less stringent than those established pursuant to BAT.
	OAC rule 3745-21-07(G)(3)	The limits established by this rule are less stringent than those established

pursuant to BAT.

2. Additional Terms and Conditions

- 2.a** Limitations for SO₂, NO_x and CO reflect the unit's potential to emit based on AP-42 emission factors. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limits.
- 2.b** The permittee shall control OC emissions from this emissions unit through the use of a catalytic incinerator with a minimum control efficiency of 95%.
- 2.c** Organic compound emissions from this emissions unit shall be reduced overall by a minimum of 94%.

B. Operational Restrictions

1. The average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 650 degrees Fahrenheit. The average temperature difference across the catalyst bed, for any 3-hour block of time when the emissions unit is in operation and applying more than 260 pounds of ink, shall not be less than 80 percent of the average temperature difference during the most recent performance test that demonstrated the emissions unit was in compliance.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall operate and maintain continuous temperature monitors and recorder(s) which measure and record(s) the temperature immediately upstream and downstream of the incinerator's catalyst bed when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorder(s) shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
2. The permittee shall collect and record the following information each day:
 - a. All 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was less than 650 degrees Fahrenheit.

- b. All 3-hour blocks of time (when the emissions unit was in operation and applying more than 260 pounds of ink per hour) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent performance test that demonstrated the emissions unit was in compliance; and,
 - c. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
 3. The permittee shall collect and record the following information for each day for the coating operation:
 - a. The company identification for each coating and cleanup material employed.
 - b. The number of gallons of each coating and cleanup material employed.
 - c. The organic compound content of each coating and cleanup material, in pounds per gallon.
 - d. The total uncontrolled organic compound emission rate for all coatings and cleanup materials, in pound per day.
 - e. The total controlled organic compound emission rate for all coatings and cleanup materials, in pounds per day (i.e., the value from (d) multiplied by the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance).
 - f. The total number of hours the emissions unit was in operation.
 - g. The average hourly controlled organic compound emission rate for all coatings and cleanup materials, i.e., (e)/(f), in pounds per hour (average).

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

4. * Per DAPC guidance, the following assumptions will be used in calculating the OC emissions for emissions unit K024: 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 fountain solution emissions is fugitive, and 70 percent is vented to the catalytic

Emissions Unit ID: **K024**

incinerator. For blanket wash systems, 50 percent of the solvent is fugitive, and 50 percent is retained in the clothes. For the VOC vented to the incinerator and generated by the ink and the fountain solution, a capture efficiency of 99% shall be used for the calculations.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all 3-hour blocks of time when the emissions unit was in operation during which the average temperature of the exhaust gases immediately before the catalyst bed or the average temperature difference across the catalyst bed does not comply with the temperature limitations specified above.
2. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the average hourly total controlled organic compound emissions exceeded 5.35 pounds per hour, and the actual average hourly organic compound emissions for each such day.

The permittee shall also submit annual reports which specify the total organic compound emissions from emissions unit K024 for the previous calendar year. These reports shall be submitted by January 31 of each year.

3. The permittee shall submit required reports in the following manner:
 - a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the Ohio EPA Central District Office.
 - b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA, Central District Office. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

E. Testing Requirements

Emissions Unit ID: **K024**

1. Compliance with the emission limitations of this permit shall be determined in accordance with the following method(s):

Emission Limitation:

Particulate emissions shall not exceed 0.067 lb/hr and 0.29 ton/yr.

Applicable Compliance Method:

The permittee shall conduct, or have conducted, emissions testing for this emissions unit to demonstrate compliance with the .067 lbs PM /hr limitation in accordance with the following requirements:

- a. The emission testing shall be conducted within 90 days of issuance of this PTI.
- b. The following test method(s) shall be employed to determine the controlled mass rate of particulate emissions from this emissions unit: 40 CFR Part 60, Appendix A, Methods 1 through 5
- c. The test(s) shall be conducted while this emissions unit is operated at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. 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, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central District Office 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 Ohio EPA, Central District Office 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 Ohio EPA, Central District Office.

Emission limitation:

Sulfur Dioxide emissions shall not exceed .0033 lb/hr and 0.015 ton /yr.

Applicable Compliance Method:

Compliance with the SO₂ emission limits shall be based upon an emission factor of .6 lb SO₂/million cubic feet (from table 1.4-2(7/98) of AP-42, 5th edition) and a maximum natural gas consumption of 5580 CFH (from the oven and incinerator combined). If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6C

Emission limitation:

Nitrogen Oxide emissions shall not exceed 0.56 lb/hr and 2.44 tons/yr.

Applicable Compliance Method:

Compliance with the NO_x emission limits shall be based upon an emission factor of 100 lb NO_x/million cubic feet (from table 1.4-2(2/98) of AP-42, 5th edition) and a maximum natural gas consumption of 5580 CFH (from the oven and incinerator combined).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7E

Emission limitation:

Carbon Monoxide emissions shall not exceed 0.468 lb/hr and 2.05 ton /yr.

Applicable Compliance Method:

Compliance with the CO emission limits shall be based upon an emission factor 84 lbs CO/million cubic feet (from table 1.4-2(2/98) of AP-42, 5th edition) and a maximum natural gas consumption of 5580 CFH (from the oven and incinerator combined).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10

Emission limitation:

Organic compound emissions shall not exceed 5.35 lbs/hr and 23.42 tons /yr.

Applicable Compliance Method:

Compliance with the 5.35 lb VOC/hr emission limit shall be based upon the required DRE testing required in these special terms and conditions, an assumed capture efficiency of 99% (for the VOC vented to the incinerator and generated by the ink and the fountain solution,) and the emission calculation methodology specified in C.3 above.

Emission limitation:

95% DRE

Applicable Compliance Method:

The permittee shall conduct, or have conducted, emissions testing for this emissions unit to demonstrate compliance with the 95 % minimum DRE requirement in accordance with the following requirements:

- a. The emission testing shall be conducted within 90 days of issuance of this PTI.
- b. The following test method(s) shall be employed to determine the destruction and removal efficiency of the control device controlling organic compound emissions from this emissions unit: 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25 or 25A, as appropriate
- c. The test(s) shall be conducted while this emissions unit and K004, K005, K008 and K009 are operated at or near their maximum capacity and venting emissions to the control device unless otherwise specified or approved by the Ohio EPA, Central District Office.

Issued: 2/16/00

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. 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, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central District Office 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 Ohio EPA, Central District Office 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 Ohio EPA, Central District Office.

Emission Limitation:

Opacity shall not exceed 20% opacity as a six minute average.

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

Emission limitation:

94% overall control of OC emissions

Applicable Compliance Method:

Compliance shall be determined through the emission calculation methodology specified in C.3 above, the DRE emissions testing required by these terms and conditions and an assumed capture efficiency of 99%(for the VOC vented to the incinerator and generated by the ink and the fountain solution,). If required, the permittee shall demonstrate compliance with the overall control requirement through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4, 25 Or 25A, and 40 CFR Part 51, Appendix M, Method 204.

F. Miscellaneous Requirements

None