



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL MODIFICATION
FAIRFIELD COUNTY**

CERTIFIED MAIL

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: 01-08690

DATE: 6/8/2004

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

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

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
309 South Fourth Street, Room 222
Columbus, Ohio 43215

Sincerely,

Michael W. Ahern

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA

CDO



**Permit To Install
Terms and Conditions**

**Issue Date: 6/8/2004
Effective Date: 6/8/2004**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 01-08690

Application Number: 01-08690
APS Premise Number: 0123010198
Permit Fee: **\$0**
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):
Manhattan heatset web offset press.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification 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 source(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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

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

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

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Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit 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 cannot meet the requirements of this permit 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 Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

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

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or

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modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

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- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. 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 ninety (90) days after commencing operation of the source(s) covered by this permit.

14. Construction Compliance Certification

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>
NOx	1.57
SO2	0.009
VOC	16.01
CO	1.32
PM	0.12

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

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>	
K015 - Manhattan heatset web offset printing press controlled by a catalytic incinerator	OAC rule 3745-31-05(A)(3)	OAC rule 3745-17-11(B)(1)
		OAC rule 3745-21-07(G)(3)
	OAC rule 3745-17-07(A)(1)	

Applicable Emissions
Limitations/Control
Measures

rule are less stringent than those established pursuant to BAT.

Particulate emissions (PE) shall not exceed 0.027 lb/hr and 0.12 ton/yr.

The limits established by this rule are less stringent than those established pursuant to BAT.

Sulfur Dioxide(SO₂) emissions shall not exceed 0.002 lb/hr and 0.009 ton/yr.

Volatile Organic Compound(VOC) emissions shall not exceed 3.66 lbs/hr and 16.01 tons /yr.

Carbon Monoxide(CO) emissions shall not exceed 0.30 lb/hr and 1.32 tons /yr.

Nitrogen Oxides(NO_x) emissions shall not exceed 0.36 lb/hr and 1.57 tons/yr.

See A.2.b below.

The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1)and 3745-17-11(B)(1).

Opacity shall not exceed 20 percent as a six minute average, except as provided by rule.

The limits established by this

2. Additional Terms and Conditions

- 2.a** The hourly and annual imitations for PM, 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 VOC emissions from this emissions unit through the use of a catalytic incinerator with a minimum control efficiency of 95%.

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 120 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 120 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

Emissions Unit ID: **K015**

- 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 VOC content of each coating and cleanup material, in pounds per gallon.
 - d. The total uncontrolled VOC emission rate for all coatings and cleanup materials, in pound per day.
 - e. The total controlled VOC 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 VOC 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.]

Per DAPC guidance, the following assumptions will be used in calculating the VOC emissions for emissions unit K015: 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 VOC 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 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 100% shall be used for the calculations.

4. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

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- a. the color of the emissions;
- b. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible emission incident; and
- e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

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. These reports are due by the date described in Part 1- General Terms and Conditions of this permit under section (A)(1).
2. The permittee shall submit deviation (excursion) reports which include the identification of each day during which the average hourly total controlled VOC emissions exceeded 3.66 pounds per hour, and the actual average hourly VOC emissions for each such day. These reports are due by the date described in Part 1- General Terms and Conditions of this permit under section (A)(1).
3. The permittee shall also submit annual reports which specify the total VOC emissions from emissions unit K015 for the previous calendar year. These reports shall be submitted by January 31 of each year.
4. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month

period.

E. Testing Requirements

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

- a. Emission Limitations: PE shall not exceed 0.027 b/hr and 0.12 ton/yr.

Applicable Compliance Method: 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 5. Compliance with the ton per year limitation shall be assumed as long as compliance is maintained with the hourly limit (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

- b. Emission limitations: SO₂ emissions shall not exceed 0.002 lb/hr and 0.009 ton /yr.

Applicable Compliance Method: Compliance with the SO₂ emission limits shall be based upon an emission factor of 0.6 lb SO₂/million cubic feet(from table 1.4-2(7/98) of AP-42, 5th edition) and a maximum natural gas consumption of 3583 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. Compliance with the ton per year limitation shall be assumed as long as compliance is maintained with the hourly limit (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

- c. Emission limitations: NO_x emissions shall not exceed 0.36 lb/hr and 1.57 tons/yr.

Applicable Compliance Method: Compliance with the NO_x emission limits shall be based upon an emission factor of 100 lbs NO_x/million cubic feet(from table 1.4-1(7/98) of AP-42,5th edition) and a maximum natural gas consumption of 3583 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. Compliance with the ton per year limitation shall be assumed as long as compliance is maintained with the hourly limit.

- d. Emission limitations: CO emissions shall not exceed 0.30 lb/hr and 1.32 tons /yr.

Applicable Compliance Method: Compliance with the CO emission limits shall be based

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upon an emission factor 84 lbs CO/million cubic feet (from table 1.4-1(7/98) of AP-42, 5th edition) and a maximum natural gas consumption of 3583 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. Compliance with the ton per year limitation shall be assumed as long as compliance is maintained with the hourly limit (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

- e. Emission limitations: VOC emissions shall not exceed 3.66 lbs/hr and VOC emissions from this emissions unit shall be controlled through the use of a catalytic incinerator with a minimum control efficiency of 95%.

Applicable Compliance Method-

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

- i. The emission testing shall be conducted within 60 days after achieving the maximum production rate but no later than 180 days after initial startup of the emissions unit.
- ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for acid gases.
- iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): Methods 1 through 4 and 25, 25A and or 18 of 40 CFR Part 60, Appendix A.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

- iv. The test(s) shall be conducted while this emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office. This emissions test also shall be conducted at the inlet of the control device to determine the uncontrolled mass rate of emission for the emission unit, for purposes of determining compliance with the 98% control requirement.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an

Emissions Unit ID: **K015**

"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.

- f. Emission limitations: VOC emissions shall not exceed 16.01 tons /yr.

Applicable Compliance Method: Compliance with the annual VOC emission limits shall be based upon the most recent DRE testing, an assumed capture efficiency of 100% (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.

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- h. Emission limitations:
Opacity shall not exceed 20 percent as a six minute average, except as provided by rule.

Applicable Compliance Method:

Compliance shall be based on the record keeping in Section III, Monitoring and Recordkeeping, term 4.

If required by Ohio EPA and/or U.S. EPA, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

2. U.S. EPA Method 24 or 24A and the procedures specified in OAC rule 3745-21-10(B) shall be used to determine the OC contents for coatings and cleanup materials. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating or cleanup material, the owner or operator shall so notify the Administrator of the U.S. EPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24. Note: The Method 24 or 24A data may be supplied by the coating or cleanup material manufacturer.

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's Air Toxic Policy was not necessary since the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. 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 result in an increase in emissions of any pollutant that has a listed TLV to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.