State of Ohio Environmental Protection Agency

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Columbus, Ohio 43215

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Columbus, OH 43216-1049

11/16/2009

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Randy Slattery
Color Resolutions International LLC
575 QUALITY BLVD
Fairfield, OH 45014

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1409030956
Permit Number: P0105383
Permit Type: Renewal
County: Butler

Dear Permit Holder:

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

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

and

Hamilton County Dept. of Environmental Services
250 William Howard Taft Pkwy.
Cincinnati, OH 45219-2660

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install and operate will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install and Operate is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Hamilton County Dept. of Environmental Services at (513)946-7777.

Sincerely,

Michael W. Ahern

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

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
HCDOES; Indiana; Kentucky

Permit Strategy Write-Up

1. Check all that apply:

   _X_ Synthetic Minor Determination

   ___ Netting Determination

2. Source Description: Color Resolutions International (CRI) manufactures solvent and water-based ink. CRI is located in Butler County. CRI has accepted restrictions for HAP emissions, OC emissions, and ink production in order to avoid Title V. OC emissions are restricted to less than 100 TPY and HAP emissions are restricted to 9.9 TPY for any individual HAP and 24.9 TPY for any combination of HAPs.

3. Facility Emissions and Attainment Status: CRI is potentially a major source for OC and HAPs without the permit limitations, and is a minor source for all other criteria pollutants. Butler County is currently non-attainment for the 8-hour ozone standard (VOC), non-attainment for particulate matter 2.5 microns and less in diameter (PM2.5), and attainment for all other criteria pollutants.

4. Source Emissions: This permit limits the OC emissions from emissions units P038 and P039, combined, to 3.4 TPY. This permit also limits the Hazardous Air Pollutant (HAP) emissions to less than 10 TPY for any individual HAP and less than 25 TPY for the combined HAPs.

5. Conclusion: This permit limits CRI to a combined annual limit of 68.02 TPY OC, for emissions units P001 – P039, and 9.9 TPY for any individual HAP and 24.9 TPY for combined HAPs based on a rolling, 12-month summation. Monthly and annual records of ink production and cleanup material employed will be required to assure compliance. By limiting these emissions to less than 100 TPY OC the facility will avoid the major source threshold and will not trigger Title V requirements.

6. Please provide additional notes or comments as necessary:

None

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

Pollutant	Tons Per Year
OC	3.4
HAP individual	9.9
HAPs combined	24.9

Butler County

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install and Operate
Color Resolutions International LLC

Issue Date: 11/16/2009
Permit Number: P0105383
Permit Type: Renewal
Permit Description: Administrative modification of PTI 14-05498 to change emissions summary reporting from a quarterly to an annual requirement.
Facility ID: 1409030956
Facility Location: Color Resolutions International LLC
575 QUALITY BLVD,
Fairfield, OH 45014
Facility Description: Printing Ink Manufacturing

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio has issued a draft action of an air pollution control, federally enforceable permit-to-install and operate (PTIO) for the facility at the location identified above on the date indicated. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Paul Tedtman at Hamilton County Dept. of Environmental Services, 250 William Howard Taft Pkwy. or (513)946-7777. The permit can be downloaded from the Web page: www.epa.ohio.gov/dapc

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

DRAFT

Air Pollution Permit-to-Install and Operate
for
Color Resolutions International LLC

Facility ID: 1409030956
Permit Number: P0105383
Permit Type: Renewal
Issued: 11/16/2009
Effective: To be entered upon final issuance
Expiration: To be entered upon final issuance

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Air Pollution Permit-to-Install and Operate
for
Color Resolutions International LLC

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Authorization

Facility ID: 1409030956
Application Number(s): M0000559
Permit Number: P0105383
Permit Description: Administrative modification of PTI 14-05498 to change emissions summary reporting from a quarterly to an annual requirement.
Permit Type: Renewal
Permit Fee: $0.00 *DO NOT send payment at this time - subject to change before final issuance*
Issue Date: 11/16/2009
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

Color Resolutions International LLC
575 QUALITY BLVD
Fairfield, OH 45014

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:

Hamilton County Dept. of Environmental Services
250 William Howard Taft Pkwy.
Cincinnati, OH 45219-2660
(513)946-7777

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

Authorization (continued)

Permit Number: P0105383
Permit Description: Administrative modification of PTI 14-05498 to change emissions summary reporting from a quarterly to an annual requirement.

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

Group Name: Shot Mill Systems 4 and 5

Emissions Unit ID:	**P038**
Company Equipment ID:	Shot Mill # 4 System
Superseded Permit Number:	14-05498
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P039**
Company Equipment ID:	Shot Mill # 5 System
Superseded Permit Number:	14-05498
General Permit Category and Type:	Not Applicable

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 Hamilton County Dept. of Environmental Services in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

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

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

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

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

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.
You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

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

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

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

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

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.

B. Facility-Wide Terms and Conditions

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) 2., 3., 4., and 5.

2. The actual emissions of hazardous air pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units P001 (Extender Tank T-159 with Mixer), P002 (Extender Tank T-160 with Mixer), P003 (Extender Tank T-156 with Mixer), P004 (Extender Tank T-157 with Mixer), P005 (Extender Tank T-158 with Mixer), P006 (Extender Tank T-155 with Mixer), P007 (Color Tank T-121 with Mixer), P008 (Color Tank T-122 with Mixer), P009 (Color Tank T-125 with Mixer), P010 (Color Tank T-126 with Mixer), P011 (Color Tank T-127 with Mixer), P012 (90 Black Process Tank T-134 with Mixer), P013 (Black Tank T-135 with Mixer), P014 (Black Packout System T-136), P015 (Black Packout System T-137), P016 (Poly Premix Tank T-144 with Mixer), P017 (Poly Premix Tank MX-118 with Mixer), P018 (Poly Premix Tank MX-146 with Mixer), P019 (Poly Shot Mill M-115 and Letdown Mixer), P020 (Drais Mill System and Letdown Tank), P021 (Premier Mill and Letdown Mixer), P022 (Newtrol Premix tank T-131 with Mixer), P023 (Newtrol Premix Tank T-104 with Mixer), P024 (Newtrol Shot Mill M-102 and Letdown Mixer), P025 (Newtrol Shot Mill M-103 and Letdown Mixer), P026 (40 inch Three roll Mill M-109), P027 (32 inch Three Roll Mil No. 5), P028 (FSH Mixer MX-106), P029 (FSH Mixer MX-107), P030 (Bench Mixer No. 1), P031 (Bench Mixer No. 2), P032 (Roto Mixer M-112), P033 (Roto Mixer M-113), P034 (Roto Mixer M-114), P035 (Roto Mixer M-115), P036 (Roto Mixer M-116), P037 (24 Pump Ink Dispensing System), P038 (Shot Mill System Number 4), P039 (Shot Mill System Number 5), P040 (Poly Premix Tank T-145), any de minimis emissions units as defined in OAC rule 3745-15-05, any registration status and/or permit exempt emissions units pursuant to OAC rule 3745-31-03, or future constructed emissions units, combined, shall not exceed 9.9 tons per year (TPY) for any single HAP, as a rolling, 12-month summation and 24.9 TPY for any combination of HAPs, as a rolling, 12-month summation.

   The permittee has existing records to demonstrate compliance with this emission limitation upon permit issuance.

3. The permittee shall collect and record the following information each month for the emissions units identified in 2. above:

   a) The name and identification number of each HAP-containing ink produced;

   b) The individual HAP* content for each HAP of each HAP-containing ink, in pounds of individual HAP per pound of HAP-containing ink, as produced;

   c) The total combined HAP content of each HAP-containing ink, in pounds of combined HAPs per pound of HAP-containing ink, as produced [sum all the individual HAP contents from b)];

   d) The number of pounds of each HAP-containing ink produced;

e) The name and identification number of each HAP-containing cleanup material employed;

f) The individual HAP content for each HAP of each HAP-containing cleanup material, in pounds of individual HAP per pound of HAP-containing cleanup material, as applied;

g) The total combined HAP content of each HAP-containing cleanup material, in pounds of combined HAPs per pound of HAP-containing cleanup material, as applied [sum all the individual HAP contents from f)];

h) The number of pounds of each HAP-containing cleanup material employed;

i) The total individual HAP emissions for each HAP from all HAP-containing inks produced and HAP-containing cleanup materials employed, in pounds or tons per month [for each HAP, the sum of b) times d) times (emission factor designated for each emissions unit) for each HAP-containing ink plus the sum of f) times h) times (1 – fraction recovered) for each HAP-containing cleanup materials, and divided by 2,000 pounds per ton, if the units are in tons];

j) The total combined HAP emissions from all HAP-containing inks produced and HAP-containing cleanup materials employed, in pounds or tons per month [the sum of c) times d) times (emission factor designated for each emissions unit) for each HAP-containing ink plus the sum of g) times h) times (1 – the solvent recovery rate) for each HAP-containing cleanup material, and divided by 2,000 pounds per tons, if the units are in tons];

k) The updated rolling, 12-month summation of emissions for each individual HAP, in tons. This shall include the information for the current month and the preceding eleven calendar months; and

l) The updated rolling, 12-month summation of emissions for the total combined HAPs, in tons. This shall include the information for the current month and the preceding eleven calendar months.

*A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on an individual emissions unit basis.

4. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP emission limitations outlined in 2. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June, and July through September, respectively).

5. Emission Limitation:

9.9 TPY for any single HAP and 24.9 TPY for combined HAPs, based on a rolling 12-month summation for the emissions units listed in 2.

Applicable Compliance Method:

Compliance with the HAP emission limitations shall be demonstrated by the record keeping requirements specified in 3.

6.

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group - Shot Mill Systems 4 and 5: P038, P039,

EU ID	Operations, Property and/or Equipment Description
P038	Shot Mill System Number Four
P039	Shot Mill System Number 5

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. d)(2).

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 1.23 pounds per hour and 26.1 pounds per day, excluding cleanup. OC emissions shall not exceed 3.4 tons per year (TPY) for emissions units P038 and P039, combined, for ink production and cleanup. See b)(2)a. and c)(1). The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V	See Sections B.2., B.3., B.4., and B.5.

(2) Additional Terms and Conditions

a. The maximum OC content for the inks produced in this emissions unit shall not exceed 80 percent by weight.

b. The hourly and daily emission limitations for OC outlined above are based on the emissions unit's potential to emit (PTE) taking into consideration the batch type nature of the operation. Therefore, no hourly and/or daily records are required to demonstrate compliance with these limits.

c. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the production limitation, OC content limitation and OC emissions limitations.

c) Operational Restrictions

(1) The maximum annual ink production rate for emissions units P038 and P039, combined, shall not exceed 600,000 pounds.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for emissions units P038 and P039 combined:

a. The name and identification of each batch of ink produced;

b. The OC content for each ink produced, in percent by weight;

c. The amount of each ink produced, in pounds;

d. The OC emissions from each ink produced, in pounds or tons, calculated by multiplying the pounds of ink produced by an emission factor of 0.0074 lb OC/pound of ink produced (NAPIM table 3-3; 3/96);

e. The name and identification of each cleanup material employed;

f. The number of pounds of each cleanup material employed;

g. The OC emissions from all cleanup materials, in pounds or tons; and

h. The total OC emissions from all inks produced and cleanup materials employed, in pounds or tons (d + g).

(2) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified federally enforceable permit-to-install and operate (FEPTIO) prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new FEPTIO.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

the rolling, 12-month emission limitation for HAP emissions specified in Section B.2.

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

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

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

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

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following methods:

a. Emission Limitation:

Organic compound (OC) emissions shall not exceed 1.23 pounds per hour and 26.1 pounds per day, excluding cleanup.

Applicable Compliance Method:

The hourly and daily emission limitations are based upon the emissions unit's potential to emit. Potential OC emissions were determined based on the following equations from the permittee-supplied information in PTI application 14-05498 as submitted on October 24, 2003:

OC = (175 pounds of ink produced per hour maximum production) x (0.7 pounds of OC per 100 pounds of ink produced emissions factor).

OC = (175 pounds of ink produced per hour maximum production) x (0.7 pounds of OC per 100 pounds of ink produced emissions factor) x (21.3 hours per day maximum hours per day mixing).

b. Emission Limitation:

OC emissions shall not exceed 3.4 tons per year (TPY) for emissions units P038 and P039, combined, for ink production and cleanup.

Applicable Compliance Method:

Compliance with the annual OC emission limitation identified in b)(1)a. shall be demonstrated by the record keeping requirement identified in d)(1).

Actual OC emissions for emissions units P038 and P039 shall be determined based on the following equation from the permittee-supplied information in PTI application 14-05498 as submitted on October 24, 2003:

OC = Sum of [(pounds of ink produced x 0.7 pounds of OC per 100 pounds of ink produced emissions factor / 2000 lbs per ton) + (pounds of cleanup material employed – pounds of cleanup material recovered / 2000 lbs per ton)] for each ink and cleanup material, and for each emissions unit.

(2) Compliance with the percent by weight OC content limit in b)(2)a. shall be determined by the record keeping requirements as specified in d)(1).

(3) Compliance with the ink production limitation in c)(1) shall be determined by the record keeping requirements as specified in d(1).

g) Miscellaneous Requirements

(1) The terms and conditions of this federally enforceable permit to install and operate supersede the terms and conditions of permit to install 14-05498, as issued on November 28, 2003, for emissions units P038 and P039.