



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
FRANKLIN 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: 01-08715

DATE: 5/6/2003

Interface Data Systems
Gregg Mayberry
539 Industrial Mile Road
Columbus, OH 43228

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,

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: 5/6/2003
Effective Date: 5/6/2003**

FINAL PERMIT TO INSTALL 01-08715

Application Number: 01-08715
APS Premise Number: 0125041850
Permit Fee: **\$400**
Name of Facility: Interface Data Systems
Person to Contact: Gregg Mayberry
Address: 539 Industrial Mile Road
Columbus, OH 43228

Location of proposed air contaminant source(s) [emissions unit(s)]:
**539 Industrial Mile Road
Columbus, Ohio**

Description of proposed emissions unit(s):
Flatbed 2 screen printing press.

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

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or record keeping 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 record keeping 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 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

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 ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

Interface Data Systems
 PTI Application: 01-08715
 Issued: 5/6/2003

Facility ID: 0125041850

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>
OC	56.4

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

A. Applicable Emissions Limitations and/or Control Requirements

1. 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>
K012 - Flatbed No. 2 Screen Printing Press with UV Cure and Electric Forced Air Dryer	OAC rule 3745-31-05(A)(3)	On any day inks in which photochemically reactive material are used, emissions of organic compounds shall not exceed 6.1 pounds per hour and 40 pounds per day. (See 2.b)
		On any day inks in which photochemically reactive material are not used, emissions of organic compounds shall not exceed 6.1 pounds per hour and 147 pounds per day
		Annual emissions of organic compounds from this emission unit shall not exceed 28.2 tons per year.
	OAC rule 3745-21-07 (G)(2)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a Use of organic compounds in cleanup operations in this emissions unit shall not exceed 360 gallons per year.
- 2.b This emissions unit becomes subject to OAC 3745-21-07(G)(2) on any day when any photochemically reactive material is employed (ink or cleanup).

B. Operational Restrictions

None

C. Monitoring and/or Record keeping Requirements

1. On any day when photochemically reactive inks are employed, the permittee shall collect and record the following information for each day for the printing operation:
 - a. The company identification for each ink and photochemically reactive cleanup material employed.
 - b. The number of gallons of each ink and photochemically reactive cleanup material employed.
 - c. The organic compound content of each ink and photochemically reactive cleanup material, in pounds per gallon.
 - d. The total organic compound emission rate for all inks and photochemically reactive cleanup materials, in pounds per day.
 - e. The total number of hours the emissions unit was in operation.
 - f. The average hourly organic compound emission rate for all inks and photochemically reactive cleanup materials, i.e., (d)/(e), in pounds per hour (average).

[Note: The ink information must be for the inks as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

2. On any day when photochemically reactive materials are not employed, the permittee shall collect and record the following information for each day for this emissions unit:
 - a. The company identification for each ink employed;
 - b. The number of gallons of each ink employed;
 - c. The organic compound content of each ink, in pounds per gallon; and
 - d. The total daily organic compound emission rate for all inks, in pounds per day.
3. The permittee shall collect and record the following information for each month for cleanup operations:

- a. The company identification for each cleanup material employed;
 - b. The number of gallons of each cleanup material employed;
 - c. The total monthly organic compound use for all cleanup materials, in gallons per month; and
 - d. The sum of total monthly organic compound use for all cleanup materials, in gallons per year, for the current month and for the preceding months.
4. The permit to install for these emissions units K012 and K013 was evaluated based on the actual materials (typically inks and cleanup materials) and the design parameters of the emissions units' exhaust systems, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Cyclohexanone

TLV (mg/m³): 96

Maximum Hourly Emission Rate (lbs/hr): 4.25

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 559

MAGLC (ug/m³): 2700

5. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
- a. Changes in the composition of the materials used (typically for inks or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

- b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
6. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

- a. A description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. Where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. For any day when photochemically reactive inks are employed, an identification of each day during which the average hourly organic compound emissions from the inks and photochemically reactive cleanup materials exceeded 6.1 pounds per hour, and the actual average hourly organic compound emissions for each such day. This report shall be submitted within 30 days after the deviation occurs.
 - b. For any day when photochemically reactive inks are employed, an identification of each day during which the organic compound emissions from the inks and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day. This report shall be submitted within 30 days after the deviation occurs.
 - c. For any day when photochemically reactive inks are not employed, an identification of

Emissions Unit ID: **K012**

each day during which the organic compound emissions from the inks exceeded 147 pounds per day, and the actual organic compound emissions for each such day. This report shall be submitted within 30 days after the deviation occurs.

- d. An identification of each year in which total organic compound use from cleanup operations exceed 360 gallons per year. This report shall be submitted by January 31 of the following year.

E. Testing Requirements

1. Emission Limitations:

On any day inks with photochemically reactive material are used, emissions of organic compounds shall not exceed 6.1 pounds per hour. On any day inks with photochemically reactive material are not used, emissions of organic compounds shall not exceed 6.1 pounds per hour.

Applicable Compliance Methods:

Compliance with the hourly organic compound emission limit shall be based upon the record keeping requirements contained in Sections C.1 and C.2 of this permit.

2. Emission Limitations:

On any day inks with photochemically reactive material are used, emissions of organic compounds shall not exceed 40 pounds per day. On any day inks with photochemically reactive material are not used, emissions of organic compounds shall not exceed 147 pounds per day.

Applicable Compliance Methods:

Compliance with the daily organic compound emission limit shall be based upon the record keeping requirements contained in Sections C.1 and C.2 of this permit.

3. Emission Limitations:

Organic compound emissions from cleanup operations from this emissions unit shall not exceed 360 gallons per year.

Applicable Compliance Methods:

Compliance with the annual organic compound usage limit from cleanup operations shall be based upon the record keeping requirements contained in Section C.3 of this permit.

4. Emission Limitations:

Annual emissions of organic compounds from this emission unit shall not exceed 28.2 tons per year.

Applicable Compliance Methods:

Compliance with the annual organic compound emission limit from this emission unit shall be

Interf:
PTI A
Issued: 5/6/2003

Emissions Unit ID: **K013**

based upon the sum of annual emission from printing operations and the annual emissions from cleanup operations. Annual emissions from printing operations will be the annual sum of emissions recorded in Sections C.1 and C.2 divided by 2000 pounds per ton. Annual emissions from cleanup operations will be annual sum of each cleanup material recorded in Section C.3 in gallons, divided by each cleanup material's density in pound per gallon, and divided by 2000 pounds per ton.

5. The VOC content of the coatings and clean-up materials shall be determined according to OAC rule 3745-21-10(B). USEPA Methods 24 shall be used to determine the VOC contents for coatings. 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, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

F. Miscellaneous Requirements

None

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

A. Applicable Emissions Limitations and/or Control Requirements

1. 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>
K013 - Flatbed No. 3 Screen Printing Press with UV Cure and Electric Forced Air Dryer	OAC rule 3745-31-05(A)(3)

Interf:
PTI A
Issued: 5/6/2003

Emissions Unit ID: **K013**

OAC rule 3745-21-07
 (G)(2)

Applicable Emissions
Limitations/Control Measures

On any day inks in which photochemically reactive material are used, emissions of organic compounds shall not exceed 6.1 pounds per hour and 40 pounds per day. (See 2.b)

On any day inks in which photochemically reactive material are not used, emissions of organic compounds shall not exceed 6.1 pounds per hour and 147 pounds per day

Annual emissions of organic compounds from this emission unit shall not exceed 28.2 tons per year.

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a** Use of organic compounds in cleanup operations in this emissions unit shall not exceed 360 gallons per year.
- 2.b** This emissions unit becomes subject to OAC 3745-21-07(G)(2) on any day when any photochemically reactive material is employed (ink or cleanup).

B. Operational Restrictions

None

C. Monitoring and/or Record keeping Requirements

1. On any day when photochemically reactive inks are employed, the permittee shall collect and record the following information for each day for the printing operation:
 - a. The company identification for each ink and photochemically reactive cleanup material employed.
 - b. The number of gallons of each ink and photochemically reactive cleanup material employed.
 - c. The organic compound content of each ink and photochemically reactive cleanup material, in pounds per gallon.
 - d. The total organic compound emission rate for all inks and photochemically reactive cleanup materials, in pounds per day.
 - e. The total number of hours the emissions unit was in operation.
 - f. The average hourly organic compound emission rate for all inks and photochemically reactive cleanup materials, i.e., (d)/(e), in pounds per hour (average).

[Note: The ink information must be for the inks as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]
2. On any day when photochemically reactive materials are not employed, the permittee shall collect and record the following information for each day for this emissions unit:
 - a. The company identification for each ink employed;
 - b. The number of gallons of each ink employed;
 - c. The organic compound content of each ink, in pounds per gallon; and
 - d. The total daily organic compound emission rate for all inks, in pounds per day.
3. The permittee shall collect and record the following information for each month for cleanup operations:
 - a. The company identification for each cleanup material employed;

- b. The number of gallons of each cleanup material employed;
 - c. The total monthly organic compound use for all cleanup materials, in gallons per month; and
 - d. The sum of total monthly organic compound use for all cleanup materials, in gallons per year, for the current month and for the preceding months.
4. The permit to install for these emissions units K012 and K013 was evaluated based on the actual materials (typically inks and cleanup materials) and the design parameters of the emissions units' exhaust systems, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Cyclohexanone

TLV (mg/m³): 96

Maximum Hourly Emission Rate (lbs/hr): 4.25

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 559

MAGLC (ug/m³): 2700

5. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
- a. Changes in the composition of the materials used (typically for inks or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the

application and modeled; and

- c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
6. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

- a. A description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. Where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. For any day when photochemically reactive inks are employed, an identification of each day during which the average hourly organic compound emissions from the inks and photochemically reactive cleanup materials exceeded 6.1 pounds per hour, and the actual average hourly organic compound emissions for each such day. This report shall be submitted within 30 days after the deviation occurs.
 - b. For any day when photochemically reactive inks are employed, an identification of each day during which the organic compound emissions from the inks and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day. This report shall be submitted within 30 days after the deviation occurs.
 - c. For any day when photochemically reactive inks are not employed, an identification of

each day during which the organic compound emissions from the inks exceeded 147 pounds per day, and the actual organic compound emissions for each such day. This report shall be submitted within 30 days after the deviation occurs.

- d. An identification of each year in which total organic compound use from cleanup operations exceed 360 gallons per year. This report shall be submitted by January 31 of the following year.

E. Testing Requirements

1. Emission Limitations:

On any day inks with photochemically reactive material are used, emissions of organic compounds shall not exceed 6.1 pounds per hour. On any day inks with photochemically reactive material are not used, emissions of organic compounds shall not exceed 6.1 pounds per hour.

Applicable Compliance Methods:

Compliance with the hourly organic compound emission limit shall be based upon the record keeping requirements contained in Sections C.1 and C.2 of this permit.

2. Emission Limitations:

On any day inks with photochemically reactive material are used, emissions of organic compounds shall not exceed 40 pounds per day. On any day inks with photochemically reactive material are not used, emissions of organic compounds shall not exceed 147 pounds per day

Applicable Compliance Methods:

Compliance with the daily organic compound emission limit shall be based upon the record keeping requirements contained in Sections C.1 and C.2 of this permit.

3. Emission Limitations:

Organic compound emissions from cleanup operations from this emissions unit shall not exceed 360 gallons per year.

Applicable Compliance Methods:

Compliance with the annual organic compound emission limit from cleanup operations shall be based upon the record keeping requirements contained in Section C.3 of this permit.

4. Emission Limitations:

Annual emissions of organic compounds from this emission unit shall not exceed 28.2 tons per year.

Interface Data Systems**PTI Application: 01 00715****Issued****Facility ID: 0125041850****Emissions Unit ID: K013****Applicable Compliance Methods:**

Compliance with the annual organic compound emission limit from this emission unit shall be based upon the sum of annual emission from printing operations and the annual emissions from cleanup operations. Annual emissions from printing operations will be the annual sum of emissions recorded in Sections C.1 and C.2 divided by 2000 pounds per ton. Annual emissions from cleanup operations will be annual sum of each cleanup material recorded in Section C.3 in gallons, divided by each cleanup material's density in pound per gallon, and divided by 2000 pounds per ton.

5. The VOC content of the coatings and clean-up materials shall be determined according to OAC rule 3745-21-10(B). USEPA Methods 24 shall be used to determine the VOC contents for coatings. 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, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

F. Miscellaneous Requirements

None

NEW SOURCE REVIEW FORM B

PTI Number: 01-08715 Facility ID: 0125041850

FACILITY NAME Interface Data Systems

FACILITY DESCRIPTION Flatbed 2 screen printing press CITY/TWP Columbus

Emissions Unit ID: **K013**

SIC CODE 2759 SCC CODE _____ EMISSIONS UNIT ID K012

EMISSIONS UNIT DESCRIPTION Flatbed No. 2 Screen Printing Press with UV Cure and Electric Forced Air Dryer

DATE INSTALLED April 2003

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	OAC 3745-21-07 (G)(2)			40 #/Day	26.8
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Organic Compounds	Generic				28.35
Other: Air Toxics	Cyclohexanone				5.68

APPLICABLE FEDERAL RULES:

NSPS? _____ NESHAP? _____ PSD? _____ OFFSET POLICY? _____

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Compliance with OAC 3745-21-07(2); NSPS, MACT and OAC 3745-21-09 do not apply to flatbed screen printing.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ _____

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES _____ NO

IDENTIFY THE AIR CONTAMINANTS: Cyclohexanone, ethyl acetate and naphthalene

SIC CODE 2759 SCC CODE _____ EMISSIONS UNIT ID K013

EMISSIONS UNIT DESCRIPTION Flatbed No. 3 Screen Printing Press with UV Cure and Electric Forced Air Dryer

DATE INSTALLED April 2003

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					

NEW SOURCE REVIEW FORM B

PTI Number: 01-08715 Facility ID: 0125041850

FACILITY NAME Interface Data Systems

FACILITY DESCRIPTION Flatbed 2 screen printing press CITY/TWP Columbus

Organic Compounds	OAC 3745-21-07 (G)(2)			40 #/day	26.8
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Organic Compounds	Generic				28.35
Other: Air Toxics	Cyclohexanone				5.68

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?**Compliance with OAC 3745-21-07(2); NSPS, MACT and OAC 3745-21-09 do not apply to flatbed screen printing.**IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ _____

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES NOIDENTIFY THE AIR CONTAMINANTS: Cyclohexanone, ethyl acetate and naphthalene