



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
FRANKLIN COUNTY**

CERTIFIED MAIL

Street Address:

50 West Town Street, Suite 700

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 01-12228

Fac ID: 0125042121

DATE: 6/10/2008

Marketing Service by Vectra
Bruce Collins
3950 Business Park Dr
Columbus, OH 43204

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 of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 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. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. 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, OH 43215

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA

CDO



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install

FINAL PERMIT TO INSTALL 01-12228

Application Number: 01-12228
Facility ID: 0125042121
Permit Fee: **\$750**
Name of Facility: Marketing Service by Vectra
Person to Contact: Bruce Collins
Address: 3950 Business Park Dr
Columbus, OH 43204

Location of proposed air contaminant source(s) [emissions unit(s)]:
3990 Business Park Dr
Columbus, Ohio

Description of proposed emissions unit(s):
Komori Web 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



Chris Korleski
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 (i.e., postmarked) quarterly 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

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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)

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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.

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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.

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>
VOC	4.13

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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.

Operations, Property, and/or Equipment - (R005) - 6-Color Heatset Web Lithographic Printing Press with ink setting oven and thermal oxidizer

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C)	See Section A.2.a below
OAC rule 3745-31-05(A)(3)(b)	See Section A.2.b below

2. Additional Terms and Conditions

- 2.a Permit to Install 01-12228 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):
 - a. voluntary restriction of 4.13 tons per year (TPY) for volatile organic compounds (VOC)
 - b. thermal oxidizer for control of VOCs with a destruction efficiency of at least 95%.
- 2.b. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the emissions from combustion of natural gas and the thermal incinerator from this air contaminant source since the uncontrolled potential to emit for SO₂, NO_x, CO, and PE is less than 10 tons/yr.

B. Operational Restrictions

1. The permittee shall vent VOC emissions from the emissions unit to a thermal incinerator that has a destruction efficiency of at least 95%.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month* for this emission unit for the purpose of determining annual VOC emissions:
 - a. the name and identification number of each ink, fountain solution, blanket wash and adhesive employed;
 - b. the amount, in pounds, of each ink, fountain solution, blanket wash and adhesive employed;
 - c. the VOC content of each ink, fountain solution, blanket wash and adhesive employed, in percent by weight, as applied;
 - d. the total controlled VOC emission rate for all inks, fountain solutions, and blanket washes; in pounds or ton(s), calculated using the destruction efficiency determined from the most recent performance test that demonstrated the emissions unit was in compliance and the formula contained in section E of these terms and conditions; and

* Since the daily VOC emission limitation for this emissions unit is based on maximum potential material usage, daily record keeping is not required. It is acceptable for the facility to maintain monthly records for the purpose of determining actual annual VOC emissions.
2. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the compliance emissions test required in section E.1 of these terms and conditions or below 1200 degrees Fahrenheit until such testing has been completed.
3. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation.
4. The permittee shall collect and record the following information for each day:
 - a. all 3-hour blocks of time during which the average combustion temperature within the regenerative thermal oxidizer, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature

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during the most recent emission test that demonstrated the emissions unit was in compliance; and

- b. a log of the downtime for the capture (collection) system, control device and monitoring equipment, when the associated emissions unit was in operation.
5. Monitoring and record keeping for the pressure in the press dryer is not required because the press dryer is interlocked with the thermal oxidizer control system and neither can be operated unless they are under negative pressure.

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D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all 3-hour blocks of time during which the average combustion temperature within the regenerative thermal oxidizer, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance of 1200 degrees F. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall submit annual deviation (excursion) reports that identify any exceedance of the annual VOC limitation. The report shall be submitted within 30 days after the deviation occurs.

E. Testing Requirements

1. Compliance with the emission limitations in sections A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

VOC emissions shall not exceed 4.13 tons/yr from the stack associated with this emissions unit.

Applicable Compliance Method:

Compliance shall be demonstrated by the following equation:

$$S = (1 - DRE) \times [0.8(P) + A_d(FS) + B_d(BW)]$$

where:

S = stack emissions, equation obtained from Engineering Guide #56;

DRE = destruction efficiency of the regenerative thermal oxidizer, expressed as a decimal or percent which was determined during the most recent performance test which demonstrated compliance with the 95% reduction of VOC emission limitation from the stack (a 95% destruction efficiency shall be used until testing has been completed);

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0.8 = 20% of VOC's in heatset inks retained by substrate, 80% emitted per Engineering Guide #56;

$P = (\text{ink usage rate, lbs/month}) \times (\text{ink VOC content, \% by weight}) \times (1 \text{ month/number of days of operation});$

$A_d = \text{mass fraction of fountain solution VOC routed to dryer and control device} = 0.7 \text{ for alcohol substitutes};$

$FS = (\text{fountain solution usage rate, lbs/month}) \times (\text{fountain solution VOC content, \% by wt.}) \times (1 \text{ month/number of days of operation});$

$B_d = \text{mass fraction of cleanup solvent routed to dryer and control device} = 0.4 \text{ for automatic blanket wash; and}$

$BW = (\text{blanket wash usage rate, lbs/month}) \times (\text{blanket wash VOC content, \% by wt.}) \times (1 \text{ month/number of days of operation}).$

The annual stack emission limitation is established by multiplying the pound per day VOC stack emission limitation by the maximum operating schedule of 365 days per year, dividing by 2000 pounds per ton.

2. US EPA Method 24 shall be used to determine the VOC contents of all the inks, fountain solutions, blanket washes and adhesives employed in this emissions unit.
3. If required, the permittee shall conduct, or have conducted, emission testing for the regenerative thermal oxidizer for this emissions unit in accordance with the following requirements:
 - a. the emissions testing shall be conducted to demonstrate compliance with the destruction efficiency limitation for VOC emissions.
 - b. The emission tests shall be conducted while the emissions unit is operating at normal or representative operating conditions. Prior to testing, the permittee shall propose to Ohio EPA Northeast District Office an operating scenario for the presses being tested which is representative of actual operating conditions and VOC input rate to the control device.
 - c. The destruction efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 and U.S.

Emissions Unit ID: **R005****Marketing Service by Vectra****Facility ID: 0125042121****PTI Application: 01-12228****Issued: 6/10/2008**

EPA Methods 25 or 25A of 40 CFR Part 60, Appendix A. Method 24A shall be used to determine VOC contents of the inks, fountain solutions and blanket washes. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast 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 tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA Northeast District Office's refusal to accept the results of the emission tests.

Personnel from the Ohio EPA Northeast 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 Northeast District Office within 30 days following completion of the test(s). The permittee may request additional time for submittal of the written report, where warranted, with prior approval from the Ohio EPA Northeast District Office.

F. Miscellaneous Requirements

None

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SIC CODE SCC CODE EMISSIONS UNIT ID
 EMISSIONS UNIT DESCRIPTION
 DATE INSTALLED

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	VOC		4.13		4.13
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

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

Enter Determination

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY?

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*? YES NO

IDENTIFY THE AIR CONTAMINANTS: