



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

Lazarus Gov.  
Center

**RE: DRAFT PERMIT TO INSTALL  
LICKING COUNTY**

**CERTIFIED MAIL**

**Application No: 01-08041**

**DATE: 2/2/00**

Communicolor RRD Direct  
Phil Koontz  
PO Box 400  
Newark, OH 43058

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on 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 public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$2800** will be due. Please do not submit any payment now.

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. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

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

cc: USEPA

CDO



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install  
Terms and  
Conditions**

**Issue Date: To be entered upon final issuance  
Effective Date: To be entered upon final issuance**

**DRAFT PERMIT TO INSTALL 01-08041**

Application Number: 01-08041  
APS Premise Number: 0145020179  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Communicolor RRD Direct  
Person to Contact: Phil Koontz  
Address: PO Box400  
Newark, OH 43058

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**190 Milliken Dr SE  
Hebron, Ohio**

Description of proposed emissions unit(s):  
**14 Heatset offset printing presses.**

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

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Director

## **Part I - GENERAL TERMS AND CONDITIONS**

### **A. Permit to Install General Terms and Conditions**

#### **1. Compliance Requirements**

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

#### **2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements**

The permittee shall submit required reports in the following manner:

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

#### **3. Records Retention Requirements**

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

#### **4. Inspections and Information Requests**

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

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

**5. Scheduled Maintenance/Malfunction Reporting**

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

**6. Permit Transfers**

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

**7. Air Pollution Nuisance**

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

**8. Termination of Permit to Install**

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

**9. Construction of New Sources(s)**

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may

lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

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

**10. Public Disclosure**

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

**11. Applicability**

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

**12. Best Available Technology**

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

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

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

**14. Construction Compliance Certification**

The 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	99

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## PART II: SPECIAL TERMS AND CONDITIONS

### 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>
Nine unit heatset web offset press	OAC rule 3745-31-05 (A)(3)	Emissions of organic compounds shall not exceed 2.82 lbs/hr and 5.79 tons/yr;
	OAC rule 3745-35-07 (C)	
	OAC rule 3745-21-07 (G)(9)	Total organic compounds emissions from K001, K002, K004, K005, K011, K012, K013, K014, K015, K016, K017, K018, K019, K020 shall not exceed 99 tons per year based on a cumulative rolling 12-month summation;  See B.1-2.below.

### 2. Additional Terms and Conditions

- 2.a None

### B. Operational Restrictions

1. This facility shall employ only non-photochemically reactive materials as defined by Ohio Administrative Code (OAC) 3745-21-01 (C)(5).
2. Total organic compounds emissions from K001, K002, K004, K005, K011-K020, shall not exceed 99 tons per year, based upon a cumulative rolling 12-month summation of the emission rates. A

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PTI A

Emissions Unit ID: **K001**

To be entered upon final issuance

table delineating the emissions during the first 12-months is not necessary because records have been submitted to the Ohio EPA, Central District Office (CDO) which demonstrate past compliance with this limit.

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information on a facility wide basis for units K001, K002, K004, K005, K011-K020:
  - a. The company identification for each coating and cleanup material employed.
  - b. The number of gallons of each coating and cleanup material employed.
  - c. The organic compound content of each coating and cleanup material, in pounds per gallon.
  - d. The total monthly organic compound emission rate for all coatings and cleanup materials in pounds and tons.
  - e. The cumulative rolling 12-month summation of the organic compound emission rate for all coatings and cleanup materials in pounds and tons.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the cumulative rolling 12-month coating and cleanup emission limitation specified in E.2. These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(1).
2. The permittee shall notify the Director (Central District Office ) in writing of any monthly record showing the use of photochemically reactive materials. These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(1).

**E. Testing Requirements**

1. Emission Limitation -  
Emissions of organic compounds shall not exceed 2.82 lbs/hr and 5.79 tons/yr.

Applicable Compliance Method -

Compliance with the long term emission rate was calculated by dividing the actual annual press OC emissions (5413 lbs) by 2000 lbs per ton. Then multiplying that number by the maximum

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To be

Facility ID: 0145020179

Emissions Unit ID: **K001**

hours of operation per year (8760 hours) divided by the actual hours of operation (4100 hr).(ENVIROPRINT Ohio, 1995) This supplies the maximum tons per year that this unit can emit.

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To be entered upon final issuance

Emissions Unit ID: **K001**

Compliance with the short term emission rate was calculated by multiplying the tons per year maximum emissions of 5.79 tons per year by 2000 pounds per ton and dividing by the actual hours of operation (4100 hr/yr).

2. Emission Limitation -  
Emissions of organic compounds from this facility shall not exceed 99 tons per year based on a cumulative rolling 12-month summation of the monthly usage figures;

Applicable Compliance Method -  
Compliance shall be demonstrated by the record keeping specified in Part II.C.1.e.

## **F. Miscellaneous Requirements**

### Air Toxic Policy

This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: Isopropyl Alcohol

TLV (ug/m3): 983,000

Maximum Hourly Emission Rate (lbs/hr): 8

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 697

MAGLC (ug/m3): 23,405

Pollutant: 2-Butoxyethanol

TLV (ug/m3): 121,000

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PTI A

Emissions Unit ID: **K001**

To be entered upon final issuance

Maximum Hourly Emission Rate (lbs/hr): 5.27

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 455

MAGLC (ug/m3): 2889

Pollutant: Stoddard Solvent

TLV (ug/m3): 525,000

Maximum Hourly Emission Rate (lbs/hr): 23.23

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2001

MAGLC (ug/m3): 12,500

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- a. changes in the composition of the materials used (typically for coatings 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 specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and
- d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;

- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

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PTI Application: 01-00041  
To be

Facility ID: 0145020179

Emissions Unit ID: **K001**

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

**PART II: SPECIAL TERMS AND CONDITIONS [Continued]**

**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>
Nine unit heatset web offset press	OAC rule 3745-31-05 (A)(3)  OAC rule 3745-35-07 (C)  OAC rule 3745-21-07 (G)(9)	Emissions of organic compounds shall not exceed 3.01 lbs/hr and 5.72 tons/yr;  Total organic compounds emissions from K001, K002, K004, K005, K011, K012, K013, K014, K015, K016, K017, K018, K019, K020 shall not exceed 99 tons per year based on a cumulative rolling 12-month summation;  See B.1-2.below.

**2. Additional Terms and Conditions**

**2.a** None

**B. Operational Restrictions**

1. This facility shall employ only non-photochemically reactive materials as defined by Ohio Administrative Code (OAC) 3745-21-01 (C)(5).
2. Total organic compounds emissions from K001, K002, K004, K005, K011-K020, shall not

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PTI A

Emissions Unit ID: **K002**

To be entered upon final issuance

exceed 99 tons per year, based upon a cumulative rolling 12-month summation of the emission rates. A table delineating the emissions during the first 12-months is not necessary because records have been submitted to the Ohio EPA, Central District Office (CDO) which demonstrate past compliance with this limit.

### **C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information on a facility wide basis for units K001, K002, K004, K005, K011-K020:
  - a. The company identification for each coating and cleanup material employed.
  - b. The number of gallons of each coating and cleanup material employed.
  - c. The organic compound content of each coating and cleanup material, in pounds per gallon.
  - d. The total monthly organic compound emission rate for all coatings and cleanup materials in pounds and tons.
  - e. The cumulative rolling 12-month summation of the organic compound emission rate for all coatings and cleanup materials in pounds and tons.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

### **D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the cumulative rolling 12-month coating and cleanup emission limitation specified in E.2. These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(1).
2. The permittee shall notify the Director (Central District Office ) in writing of any monthly record showing the use of photochemically reactive materials. These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(1).

### **E. Testing Requirements**

1. Emission Limitation -

Communicolor RRD Direct  
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To be

Facility ID: 0145020179

Emissions Unit ID: **K002**

Emissions of organic compounds shall not exceed 3.01 lbs/hr and 5.72 tons/yr.

Applicable Compliance Method -

Compliance with the long term emission rate was calculated by dividing the actual annual press OC emissions (4952 lbs) by 2000 lbs per ton. Then multiplying that number by the maximum hours of operation per year (8760 hours) divided by the actual hours of operation (3800 hr).(ENVIROPRINT Ohio, 1995) This supplies the maximum tons per year that this unit can emit.

Emissions Unit ID: **K002**

Compliance with the short term emission rate was calculated by multiplying the tons per year maximum emissions of 5.72 tons per year by 2000 pounds per ton and dividing by the actual hours of operation (3800 hr/yr).

2. Emission Limitation -  
Emissions of organic compounds from this facility shall not exceed 99 tons per year based on a cumulative rolling 12-month summation of the monthly usage figures;

Applicable Compliance Method -  
Compliance shall be demonstrated by the record keeping specified in Part II.C.1.e.

## **F. Miscellaneous Requirements**

### Air Toxic Policy

This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: Isopropyl Alcohol

TLV (ug/m3): 983,000

Maximum Hourly Emission Rate (lbs/hr): 8

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 697

MAGLC (ug/m3): 23,405

Pollutant: 2-Butoxyethanol

TLV (ug/m3): 121,000

Maximum Hourly Emission Rate (lbs/hr): 5.27

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Emissions Unit ID: **K002**

To be entered upon final issuance

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 455

MAGLC (ug/m3): 2889

Pollutant: Stoddard Solvent

TLV (ug/m3): 525,000

Maximum Hourly Emission Rate (lbs/hr): 23.23

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2001

MAGLC (ug/m3): 12,500

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- a. changes in the composition of the materials used (typically for coatings 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 specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and
- d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its

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PTI A

Emissions Unit ID: **K002**

To be entered upon final issuance

permit to install; and

- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

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PTI Application: 01-00041  
To be

Facility ID: 0145020179

Emissions Unit ID: **K002**

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

**PART II: SPECIAL TERMS AND CONDITIONS [Continued]**

**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>
Nine unit heatset web offset press	OAC rule 3745-31-05 (A)(3)  OAC rule 3745-35-07 (C)  OAC rule 3745-21-07 (G)(9)	Emissions of organic compounds shall not exceed 3.13 lbs/hr and 6.89 tons/yr;  Total organic compounds emissions from K001, K002, K004, K005, K011, K012, K013, K014, K015, K016, K017, K018, K019, K020 shall not exceed 99 tons per year based on a cumulative rolling 12-month summation;  See B.1-2.below.

**2. Additional Terms and Conditions**

**2.a** None

**B. Operational Restrictions**

1. This facility shall employ only non-photochemically reactive materials as defined by Ohio Administrative Code (OAC) 3745-21-01 (C)(5).
2. Total organic compounds emissions from K001, K002, K004, K005, K011-K020, shall not

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Emissions Unit ID: **K004**

To be entered upon final issuance

exceed 99 tons per year, based upon a cumulative rolling 12-month summation of the emission rates. A table delineating the emissions during the first 12-months is not necessary because records have been submitted to the Ohio EPA, Central District Office (CDO) which demonstrate past compliance with this limit.

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information on a facility wide basis for units K001, K002, K004, K005, K011-K020:
  - a. The company identification for each coating and cleanup material employed.
  - b. The number of gallons of each coating and cleanup material employed.
  - c. The organic compound content of each coating and cleanup material, in pounds per gallon.
  - d. The total monthly organic compound emission rate for all coatings and cleanup materials in pounds and tons.
  - e. The cumulative rolling 12-month summation of the organic compound emission rate for all coatings and cleanup materials in pounds and tons.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the cumulative rolling 12-month coating and cleanup emission limitation specified in E.2. These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(1).
2. The permittee shall notify the Director (Central District Office ) in writing of any monthly record showing the use of photochemically reactive materials. These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(1).

**E. Testing Requirements**

1. Emission Limitation -  
Emissions of organic compounds shall not exceed 3.13 lbs/hr and 6.89 tons/yr.

Applicable Compliance Method -

Compliance with the long term emission rate was calculated by dividing the actual annual press OC emissions (6910 lbs) by 2000 lbs per ton. Then multiplying that number by the maximum

Communicolor RRD Direct  
PTI Applications 01 00011  
To be

Facility ID: 0145020179

Emissions Unit ID: **K004**

hours of operation per year (8760 hours) divided by the actual hours of operation (4400 hr).(ENVIROPRINT Ohio, 1995) This supplies the maximum tons per year that this unit can emit.

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Emissions Unit ID: **K004**

To be entered upon final issuance

Compliance with the short term emission rate was calculated by multiplying the tons per year maximum emissions of 6.89 tons per year by 2000 pounds per ton and dividing by the actual hours of operation (4400 hr/yr).

2. Emission Limitation -

Emissions of organic compounds from this facility shall not exceed 99 tons per year based on a cumulative rolling 12-month summation of the monthly usage figures;

Applicable Compliance Method -

Compliance shall be demonstrated by the record keeping specified in Part II.C.1.e.

**F. Miscellaneous Requirements**

Air Toxic Policy

This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: Isopropyl Alcohol

TLV (ug/m3): 983,000

Maximum Hourly Emission Rate (lbs/hr): 8

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 697

MAGLC (ug/m3): 23,405

Pollutant: 2-Butoxyethanol

TLV (ug/m3): 121,000

Maximum Hourly Emission Rate (lbs/hr): 5.27

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To be entered upon final issuance

Emissions Unit ID: **K004**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 455

MAGLC (ug/m3): 2889

Pollutant: Stoddard Solvent

TLV (ug/m3): 525,000

Maximum Hourly Emission Rate (lbs/hr): 23.23

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2001

MAGLC (ug/m3): 12,500

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- a. changes in the composition of the materials used (typically for coatings 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 specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and
- d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;

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Emissions Unit ID: **K004**

To be entered upon final issuance

- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

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PTI Application: 01-00041  
To be

Facility ID: 0145020179

Emissions Unit ID: **K004**

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

**PART II: SPECIAL TERMS AND CONDITIONS [Continued]**

**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>
Nine unit heatset web offset press	OAC rule 3745-31-05 (A)(3)  OAC rule 3745-35-07 (C)  OAC rule 3745-21-07 (G)(9)	Emissions of organic compounds shall not exceed 2.74 lbs/hr and 6.17 tons/yr;  Total organic compounds emissions from K001, K002, K004, K005, K011, K012, K013, K014, K015, K016, K017, K018, K019, K020 shall not exceed 99 tons per year based on a cumulative rolling 12-month summation;  See B.1-2.below.

**2. Additional Terms and Conditions**

- 2.a** None

**B. Operational Restrictions**

1. This facility shall employ only non-photochemically reactive materials as defined by Ohio Administrative Code (OAC) 3745-21-01 (C)(5).
2. Total organic compounds emissions from K001, K002, K004, K005, K011-K020, shall not

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Emissions Unit ID: **K005**

To be entered upon final issuance

exceed 99 tons per year, based upon a cumulative rolling 12-month summation of the emission rates. A table delineating the emissions during the first 12-months is not necessary because records have been submitted to the Ohio EPA, Central District Office (CDO) which demonstrate past compliance with this limit.

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information on a facility wide basis for units K001, K002, K004, K005, K011-K020:
  - a. The company identification for each coating and cleanup material employed.
  - b. The number of gallons of each coating and cleanup material employed.
  - c. The organic compound content of each coating and cleanup material, in pounds per gallon.
  - d. The total monthly organic compound emission rate for all coatings and cleanup materials in pounds and tons.
  - e. The cumulative rolling 12-month summation of the organic compound emission rate for all coatings and cleanup materials in pounds and tons.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the cumulative rolling 12-month coating and cleanup emission limitation specified in E.2. These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(1).
2. The permittee shall notify the Director (Central District Office ) in writing of any monthly record showing the use of photochemically reactive materials. These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(1).

**E. Testing Requirements**

1. Emission Limitation -  
Emissions of organic compounds shall not exceed 2.74 lbs/hr and 6.17 tons/yr.

Applicable Compliance Method -

Compliance with the long term emission rate was calculated by dividing the actual annual press OC emissions (6335 lbs) by 2000 lbs per ton. Then multiplying that number by the maximum

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Emissions Unit ID: **K005**

To be entered upon final issuance

hours of operation per year (8760 hours) divided by the actual hours of operation (4500 hr).(ENVIROPRINT Ohio, 1995) This supplies the maximum tons per year that this unit can emit.

Emissions Unit ID: **K005**

Compliance with the short term emission rate was calculated by multiplying the tons per year maximum emissions of 6.17 tons per year by 2000 pounds per ton and dividing by the actual hours of operation (4500 hr/yr).

2. Emission Limitation -  
Emissions of organic compounds from this facility shall not exceed 99 tons per year based on a cumulative rolling 12-month summation of the monthly usage figures;

Applicable Compliance Method -  
Compliance shall be demonstrated by the record keeping specified in Part II.C.1.e.

## **F. Miscellaneous Requirements**

### Air Toxic Policy

This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: Isopropyl Alcohol

TLV (ug/m3): 983,000

Maximum Hourly Emission Rate (lbs/hr): 8

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 697

MAGLC (ug/m3): 23,405

Pollutant: 2-Butoxyethanol

TLV (ug/m3): 121,000

Maximum Hourly Emission Rate (lbs/hr): 5.27

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Emissions Unit ID: **K005**

To be entered upon final issuance

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 455

MAGLC (ug/m3): 2889

Pollutant: Stoddard Solvent

TLV (ug/m3): 525,000

Maximum Hourly Emission Rate (lbs/hr): 23.23

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2001

MAGLC (ug/m3): 12,500

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- a. changes in the composition of the materials used (typically for coatings 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 specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and
- d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its

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PTI A

Emissions Unit ID: **K005**

To be entered upon final issuance

permit to install; and

- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

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PTI A

Emissions Unit ID: **K005**

To be entered upon final issuance

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

**PART II: SPECIAL TERMS AND CONDITIONS [Continued]**

**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>
Nine unit heatset web offset press	OAC rule 3745-31-05 (A)(3)  OAC rule 3745-35-07 (C)  OAC rule 3745-21-07 (G)(9)	Emissions of organic compounds shall not exceed 2.51 lbs/hr and 5.91 tons/yr;  Total organic compounds emissions from K001, K002, K004, K005, K011, K012, K013, K014, K015, K016, K017, K018, K019, K020 shall not exceed 99 tons per year based on a cumulative rolling 12-month summation;  See B.1-2.below.

**2. Additional Terms and Conditions**

**2.a** None

**B. Operational Restrictions**

1. This facility shall employ only non-photochemically reactive materials as defined by Ohio Administrative Code (OAC) 3745-21-01 (C)(5).
2. Total organic compounds emissions from K001, K002, K004, K005, K011-K020, shall not exceed 99 tons per year, based upon a cumulative rolling 12-month summation of the emission rates. A

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Emissions Unit ID: **K011**

To be entered upon final issuance

table delineating the emissions during the first 12-months is not necessary because records have been submitted to the Ohio EPA, Central District Office (CDO) which demonstrate past compliance with this limit.

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information on a facility wide basis for units K001, K002, K004, K005, K011-K020:
  - a. The company identification for each coating and cleanup material employed.
  - b. The number of gallons of each coating and cleanup material employed.
  - c. The organic compound content of each coating and cleanup material, in pounds per gallon.
  - d. The total monthly organic compound emission rate for all coatings and cleanup materials in pounds and tons.
  - e. The cumulative rolling 12-month summation of the organic compound emission rate for all coatings and cleanup materials in pounds and tons.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the cumulative rolling 12-month coating and cleanup emission limitation specified in E.2. These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(1).
2. The permittee shall notify the Director (Central District Office ) in writing of any monthly record showing the use of photochemically reactive materials. These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(1).

**E. Testing Requirements**

1. Emission Limitation -  
Emissions of organic compounds shall not exceed 2.51 lbs/hr and 5.91 tons/yr.

Applicable Compliance Method -

Compliance with the long term emission rate was calculated by dividing the actual annual press OC emissions (6335 lbs) by 2000 lbs per ton. Then multiplying that number by the maximum

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Emissions Unit ID: **K011**

To be entered upon final issuance

hours of operation per year (8760 hours) divided by the actual hours of operation (4700 hr).(ENVIROPRINT Ohio, 1995) This supplies the maximum tons per year that this unit can emit.

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Emissions Unit ID: **K011**

To be entered upon final issuance

Compliance with the short term emission rate was calculated by multiplying the tons per year maximum emissions of 5.91 tons per year by 2000 pounds per ton and dividing by the actual hours of operation (4700 hr/yr).

2. Emission Limitation -

Emissions of organic compounds from this facility shall not exceed 99 tons per year based on a cumulative rolling 12-month summation of the monthly usage figures;

Applicable Compliance Method -

Compliance shall be demonstrated by the record keeping specified in Part II.C.1.e.

**F. Miscellaneous Requirements**

Air Toxic Policy

This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: Isopropyl Alcohol

TLV (ug/m3): 983,000

Maximum Hourly Emission Rate (lbs/hr): 8

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 697

MAGLC (ug/m3): 23,405

Pollutant: 2-Butoxyethanol

TLV (ug/m3): 121,000

Maximum Hourly Emission Rate (lbs/hr): 5.27

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 455

MAGLC (ug/m3): 2889

Pollutant: Stoddard Solvent

TLV (ug/m3): 525,000

Maximum Hourly Emission Rate (lbs/hr): 23.23

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2001

MAGLC (ug/m3): 12,500

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- a. changes in the composition of the materials used (typically for coatings 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 specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and
- d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its

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Emissions Unit ID: **K011**

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permit to install; and

- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

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Emissions Unit ID: **K011**

To be entered upon final issuance

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

**PART II: SPECIAL TERMS AND CONDITIONS [Continued]****A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Nine unit heatset web offset press	OAC rule 3745-31-05 (A)(3)  OAC rule 3745-35-07 (C)          OAC rule 3745-21-07 (G)(9)	Emissions of organic compounds shall not exceed 3.57 lbs/hr and 7.45 tons/yr;  Total organic compounds emissions from K001, K002, K004, K005, K011, K012, K013, K014, K015, K016, K017, K018, K019, K020 shall not exceed 99 tons per year based on a cumulative rolling 12-month summation;  See B.1-2.below.

**2. Additional Terms and Conditions**

**2.a** None

**B. Operational Restrictions**

- This facility shall employ only non-photochemically reactive materials as defined by Ohio Administrative Code (OAC) 3745-21-01 (C)(5).
- Total organic compounds emissions from K001, K002, K004, K005, K011-K020, shall not

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Facility ID: 0145020179

Emissions Unit ID: **K012**

exceed 99 tons per year, based upon a cumulative rolling 12-month summation of the emission rates. A table delineating the emissions during the first 12-months is not necessary because records have been submitted to the Ohio EPA, Central District Office (CDO) which demonstrate past compliance with this limit.

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information on a facility wide basis for units K001, K002, K004, K005, K011-K020:
  - a. The company identification for each coating and cleanup material employed.
  - b. The number of gallons of each coating and cleanup material employed.
  - c. The organic compound content of each coating and cleanup material, in pounds per gallon.
  - d. The total monthly organic compound emission rate for all coatings and cleanup materials in pounds and tons.
  - e. The cumulative rolling 12-month summation of the organic compound emission rate for all coatings and cleanup materials in pounds and tons.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the cumulative rolling 12-month coating and cleanup emission limitation specified in E.2. These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(1).
2. The permittee shall notify the Director (Central District Office ) in writing of any monthly record showing the use of photochemically reactive materials. These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(1).

**E. Testing Requirements**

1. Emission Limitation -  
Emissions of organic compounds shall not exceed 3.57 lbs/hr and 7.45 tons/yr.

Applicable Compliance Method -

Compliance with the long term emission rate was calculated by dividing the actual annual press OC emissions (7141 lbs) by 2000 lbs per ton. Then multiplying that number by the maximum

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Emissions Unit ID: **K012**

To be entered upon final issuance

hours of operation per year (8760 hours) divided by the actual hours of operation (4200 hr).(ENVIROPRINT Ohio, 1995) This supplies the maximum tons per year that this unit can emit.

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PTI A

Emissions Unit ID: **K012**

To be entered upon final issuance

Compliance with the short term emission rate was calculated by multiplying the tons per year maximum emissions of 7.45 tons per year by 2000 pounds per ton and dividing by the actual hours of operation (4200 hr/yr).

2. Emission Limitation -  
Emissions of organic compounds from this facility shall not exceed 99 tons per year based on a cumulative rolling 12-month summation of the monthly usage figures;

Applicable Compliance Method -

Compliance shall be demonstrated by the record keeping specified in Part II.C.1.e.

## **F. Miscellaneous Requirements**

### Air Toxic Policy

This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: Isopropyl Alcohol

TLV (ug/m3): 983,000

Maximum Hourly Emission Rate (lbs/hr): 8

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 697

MAGLC (ug/m3): 23,405

Pollutant: 2-Butoxyethanol

TLV (ug/m3): 121,000

Maximum Hourly Emission Rate (lbs/hr): 5.27

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 455

MAGLC (ug/m3): 2889

Pollutant: Stoddard Solvent

TLV (ug/m3): 525,000

Maximum Hourly Emission Rate (lbs/hr): 23.23

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2001

MAGLC (ug/m3): 12,500

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- a. changes in the composition of the materials used (typically for coatings 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 specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and
- d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its

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permit to install; and

- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

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PTI A

Emissions Unit ID: **K012**

To be entered upon final issuance

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

**PART II: SPECIAL TERMS AND CONDITIONS [Continued]**

**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>
Nine unit heatset web offset press	OAC rule 3745-31-05 (A)(3)  OAC rule 3745-35-07 (C)  OAC rule 3745-21-07 (G)(9)	Emissions of organic compounds shall not exceed 2.57 lbs/hr and 5.52 tons/yr;  Total organic compounds emissions from K001, K002, K004, K005, K011, K012, K013, K014, K015, K016, K017, K018, K019, K020 shall not exceed 99 tons per year based on a cumulative rolling 12-month summation;  See B.1-2.below.

2. **Additional Terms and Conditions**

- 2.a None

**B. Operational Restrictions**

1. This facility shall employ only non-photochemically reactive materials as defined by Ohio Administrative Code (OAC) 3745-21-01 (C)(5).
2. Total organic compounds emissions from K001, K002, K004, K005, K011-K020, shall not

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Facility ID: 0145020179

Emissions Unit ID: **K013**

exceed 99 tons per year, based upon a cumulative rolling 12-month summation of the emission rates. A table delineating the emissions during the first 12-months is not necessary because records have been submitted to the Ohio EPA, Central District Office (CDO) which demonstrate past compliance with this limit.

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information on a facility wide basis for units K001, K002, K004, K005, K011-K020:
  - a. The company identification for each coating and cleanup material employed.
  - b. The number of gallons of each coating and cleanup material employed.
  - c. The organic compound content of each coating and cleanup material, in pounds per gallon.
  - d. The total monthly organic compound emission rate for all coatings and cleanup materials in pounds and tons.
  - e. The cumulative rolling 12-month summation of the organic compound emission rate for all coatings and cleanup materials in pounds and tons.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the cumulative rolling 12-month coating and cleanup emission limitation specified in E.2. These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(1).
2. The permittee shall notify the Director (Central District Office ) in writing of any monthly record showing the use of photochemically reactive materials. These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(1).

**E. Testing Requirements**

1. Emission Limitation -  
Emissions of organic compounds shall not exceed 2.57 lbs/hr and 5.52 tons/yr.

Applicable Compliance Method -

Compliance with the long term emission rate was calculated by dividing the actual annual press OC emissions (5413 lbs) by 2000 lbs per ton. Then multiplying that number by the maximum

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PTI A

Emissions Unit ID: **K013**

To be entered upon final issuance

hours of operation per year (8760 hours) divided by the actual hours of operation (4300 hr).(ENVIROPRINT Ohio, 1995) This supplies the maximum tons per year that this unit can emit.

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Emissions Unit ID: **K013**

To be entered upon final issuance

Compliance with the short term emission rate was calculated by multiplying the tons per year maximum emissions of 5.52 tons per year by 2000 pounds per ton and dividing by the actual hours of operation (4300 hr/yr).

2. Emission Limitation -  
Emissions of organic compounds from this facility shall not exceed 99 tons per year based on a cumulative rolling 12-month summation of the monthly usage figures;

Applicable Compliance Method -  
Compliance shall be demonstrated by the record keeping specified in Part II.C.1.e.

## **F. Miscellaneous Requirements**

### Air Toxic Policy

This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: Isopropyl Alcohol

TLV (ug/m3): 983,000

Maximum Hourly Emission Rate (lbs/hr): 8

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 697

MAGLC (ug/m3): 23,405

Pollutant: 2-Butoxyethanol

TLV (ug/m3): 121,000

Maximum Hourly Emission Rate (lbs/hr): 5.27

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 455

MAGLC (ug/m3): 2889

Pollutant: Stoddard Solvent

TLV (ug/m3): 525,000

Maximum Hourly Emission Rate (lbs/hr): 23.23

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2001

MAGLC (ug/m3): 12,500

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- a. changes in the composition of the materials used (typically for coatings 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 specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and
- d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its

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Emissions Unit ID: **K013**

To be entered upon final issuance

permit to install; and

- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

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PTI A

Emissions Unit ID: **K013**

To be entered upon final issuance

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

**PART II: SPECIAL TERMS AND CONDITIONS [Continued]**

**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>
Nine unit heatset web offset press	OAC rule 3745-31-05 (A)(3)  OAC rule 3745-35-07 (C)  OAC rule 3745-21-07 (G)(9)	Emissions of organic compounds shall not exceed 2.70 lbs/hr and 5.95 tons/yr;  Total organic compounds emissions from K001, K002, K004, K005, K011, K012, K013, K014, K015, K016, K017, K018, K019, K020 shall not exceed 99 tons per year based on a cumulative rolling 12-month summation;  See B.1-2.below.

**2. Additional Terms and Conditions**

**2.a** None

**B. Operational Restrictions**

1. This facility shall employ only non-photochemically reactive materials as defined by Ohio Administrative Code (OAC) 3745-21-01 (C)(5).
2. Total organic compounds emissions from K001, K002, K004, K005, K011-K020, shall not

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PTI A

Emissions Unit ID: **K014**

To be entered upon final issuance

exceed 99 tons per year, based upon a cumulative rolling 12-month summation of the emission rates. A table delineating the emissions during the first 12-months is not necessary because records have been submitted to the Ohio EPA, Central District Office (CDO) which demonstrate past compliance with this limit.

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information on a facility wide basis for units K001, K002, K004, K005, K011-K020:
  - a. The company identification for each coating and cleanup material employed.
  - b. The number of gallons of each coating and cleanup material employed.
  - c. The organic compound content of each coating and cleanup material, in pounds per gallon.
  - d. The total monthly organic compound emission rate for all coatings and cleanup materials in pounds and tons.
  - e. The cumulative rolling 12-month summation of the organic compound emission rate for all coatings and cleanup materials in pounds and tons.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the cumulative rolling 12-month coating and cleanup emission limitation specified in E.2. These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(1).
2. The permittee shall notify the Director (Central District Office ) in writing of any monthly record showing the use of photochemically reactive materials. These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(1).

**E. Testing Requirements**

1. Emission Limitation -  
Emissions of organic compounds shall not exceed 2.70 lbs/hr and 5.95 tons/yr.

Applicable Compliance Method -

Compliance with the long term emission rate was calculated by dividing the actual annual press OC emissions (5989 lbs) by 2000 lbs per ton. Then multiplying that number by the maximum hours of operation per year (8760 hours) divided by the actual hours of operation (4400

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PTI A

Emissions Unit ID: **K014**

To be entered upon final issuance

hr).(ENVIROPRINT Ohio, 1995) This supplies the maximum tons per year that this unit can emit.

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Emissions Unit ID: **K014**

To be entered upon final issuance

Compliance with the short term emission rate was calculated by multiplying the tons per year maximum emissions of 5.95 tons per year by 2000 pounds per ton and dividing by the actual hours of operation (4400 hr/yr).

2. Emission Limitation -  
Emissions of organic compounds from this facility shall not exceed 99 tons per year based on a cumulative rolling 12-month summation of the monthly usage figures;

Applicable Compliance Method -

Compliance shall be demonstrated by the record keeping specified in Part II.C.1.e.

## **F. Miscellaneous Requirements**

### Air Toxic Policy

This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: Isopropyl Alcohol

TLV (ug/m3): 983,000

Maximum Hourly Emission Rate (lbs/hr): 8

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 697

MAGLC (ug/m3): 23,405

Pollutant: 2-Butoxyethanol

TLV (ug/m3): 121,000

Maximum Hourly Emission Rate (lbs/hr): 5.27

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To be entered upon final issuance

Emissions Unit ID: **K014**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 455

MAGLC (ug/m3): 2889

Pollutant: Stoddard Solvent

TLV (ug/m3): 525,000

Maximum Hourly Emission Rate (lbs/hr): 23.23

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2001

MAGLC (ug/m3): 12,500

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- a. changes in the composition of the materials used (typically for coatings 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 specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and
- d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;

Emissions Unit ID: **K014**

- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

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PTI A

Emissions Unit ID: **K014**

To be entered upon final issuance

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

**PART II: SPECIAL TERMS AND CONDITIONS [Continued]****A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Ten unit heatset web offset press	OAC rule 3745-31-05 (A)(3)	Emissions of organic compounds shall not exceed 4.02 lbs/hr and 10.66 tons/yr;
	OAC rule 3745-35-07 (C)	Total organic compounds emissions from K001, K002, K004, K005, K011, K012, K013, K014, K015, K016, K017, K018, K019, K020 shall not exceed 99 tons per year based on a cumulative rolling 12-month summation;
	OAC rule 3745-21-07 (G)(9)	See B.1-2.below.

**2. Additional Terms and Conditions**

**2.a** None

**B. Operational Restrictions**

- This facility shall employ only non-photochemically reactive materials as defined by Ohio Administrative Code (OAC) 3745-21-01 (C)(5).
- Total organic compounds emissions from K001, K002, K004, K005, K011-K020, shall not

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PTI A

Emissions Unit ID: **K015**

To be entered upon final issuance

exceed 99 tons per year, based upon a cumulative rolling 12-month summation of the emission rates. A table delineating the emissions during the first 12-months is not necessary because records have been submitted to the Ohio EPA, Central District Office (CDO) which demonstrate past compliance with this limit.

### **C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information on a facility wide basis for units K001, K002, K004, K005, K011-K020:
  - a. The company identification for each coating and cleanup material employed.
  - b. The number of gallons of each coating and cleanup material employed.
  - c. The organic compound content of each coating and cleanup material, in pounds per gallon.
  - d. The total monthly organic compound emission rate for all coatings and cleanup materials in pounds and tons.
  - e. The cumulative rolling 12-month summation of the organic compound emission rate for all coatings and cleanup materials in pounds and tons.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

### **D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the cumulative rolling 12-month coating and cleanup emission limitation specified in E.2. These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(1).
2. The permittee shall notify the Director (Central District Office ) in writing of any monthly record showing the use of photochemically reactive materials. These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(1).

### **E. Testing Requirements**

1. Emission Limitation -

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Facility ID: 0145020179

Emissions Unit ID: **K015**

Emissions of organic compounds shall not exceed 4.02 lbs/hr and 10.66 tons/yr.

Applicable Compliance Method -

Compliance with the long term emission rate was calculated by dividing the actual annual press OC emissions (12,900 lbs) by 2000 lbs per ton. Then multiplying that number by the maximum hours of operation per year (8760 hours) divided by the actual hours of operation (5300 hr).(ENVIROPRINT Ohio, 1995) This supplies the maximum tons per year that this unit can emit.

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PTI A

Emissions Unit ID: **K015**

To be entered upon final issuance

Compliance with the short term emission rate was calculated by multiplying the tons per year maximum emissions of 10.66 tons per year by 2000 pounds per ton and dividing by the actual hours of operation (5300 hr/yr).

2. Emission Limitation -

Emissions of organic compounds from this facility shall not exceed 99 tons per year based on a cumulative rolling 12-month summation of the monthly usage figures;

Applicable Compliance Method -

Compliance shall be demonstrated by the record keeping specified in Part II.C.1.e.

**F. Miscellaneous Requirements**

Air Toxic Policy

This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: Isopropyl Alcohol

TLV (ug/m3): 983,000

Maximum Hourly Emission Rate (lbs/hr): 8

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 697

MAGLC (ug/m3): 23,405

Pollutant: 2-Butoxyethanol

TLV (ug/m3): 121,000

Maximum Hourly Emission Rate (lbs/hr): 5.27

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PTI A

To be entered upon final issuance

Emissions Unit ID: **K015**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 455

MAGLC (ug/m3): 2889

Pollutant: Stoddard Solvent

TLV (ug/m3): 525,000

Maximum Hourly Emission Rate (lbs/hr): 23.23

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2001

MAGLC (ug/m3): 12,500

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- a. changes in the composition of the materials used (typically for coatings 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 specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and
- d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;

Emissions Unit ID: **K015**

- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

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PTI A

Emissions Unit ID: **K015**

To be entered upon final issuance

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

**PART II: SPECIAL TERMS AND CONDITIONS [Continued]****A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Ten unit heatset web offset press	OAC rule 3745-31-05 (A)(3)  OAC rule 3745-35-07 (C)  OAC rule 3745-21-07 (G)(9)	Emissions of organic compounds shall not exceed 4.00 lbs/hr and 7.76 tons/yr;  Total organic compounds emissions from K001, K002, K004, K005, K011, K012, K013, K014, K015, K016, K017, K018, K019, K020 shall not exceed 99 tons per year based on a cumulative rolling 12-month summation;  See B.1-2.below.

**2. Additional Terms and Conditions**

**2.a** None

**B. Operational Restrictions**

- This facility shall employ only non-photochemically reactive materials as defined by Ohio Administrative Code (OAC) 3745-21-01 (C)(5).
- Total organic compounds emissions from K001, K002, K004, K005, K011-K020, shall not

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Emissions Unit ID: **K016**

To be entered upon final issuance

exceed 99 tons per year, based upon a cumulative rolling 12-month summation of the emission rates. A table delineating the emissions during the first 12-months is not necessary because records have been submitted to the Ohio EPA, Central District Office (CDO) which demonstrate past compliance with this limit.

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information on a facility wide basis for units K001, K002, K004, K005, K011-K020:
  - a. The company identification for each coating and cleanup material employed.
  - b. The number of gallons of each coating and cleanup material employed.
  - c. The organic compound content of each coating and cleanup material, in pounds per gallon.
  - d. The total monthly organic compound emission rate for all coatings and cleanup materials in pounds and tons.
  - e. The cumulative rolling 12-month summation of the organic compound emission rate for all coatings and cleanup materials in pounds and tons.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the cumulative rolling 12-month coating and cleanup emission limitation specified in E.2. These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(1).
2. The permittee shall notify the Director (Central District Office ) in writing of any monthly record showing the use of photochemically reactive materials. These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(1).

**E. Testing Requirements**

1. Emission Limitation -  
Emissions of organic compounds shall not exceed 4.00 lbs/hr and 7.76 tons/yr.

Applicable Compliance Method -

Compliance with the long term emission rate was calculated by dividing the actual annual press OC emissions (6910 lbs) by 2000 lbs per ton. Then multiplying that number by the maximum

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PTI Applications 01 00011  
To be

Facility ID: 0145020179

Emissions Unit ID: **K016**

hours of operation per year (8760 hours) divided by the actual hours of operation (3900 hr).(ENVIROPRINT Ohio, 1995) This supplies the maximum tons per year that this unit can emit.

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PTI A

Emissions Unit ID: **K016**

To be entered upon final issuance

Compliance with the short term emission rate was calculated by multiplying the tons per year maximum emissions of 7.76 tons per year by 2000 pounds per ton and dividing by the actual hours of operation (3900 hr/yr).

2. Emission Limitation -  
Emissions of organic compounds from this facility shall not exceed 99 tons per year based on a cumulative rolling 12-month summation of the monthly usage figures;

Applicable Compliance Method -

Compliance shall be demonstrated by the record keeping specified in Part II.C.1.e.

## **F. Miscellaneous Requirements**

### Air Toxic Policy

This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: Isopropyl Alcohol

TLV (ug/m3): 983,000

Maximum Hourly Emission Rate (lbs/hr): 8

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 697

MAGLC (ug/m3): 23,405

Pollutant: 2-Butoxyethanol

TLV (ug/m3): 121,000

Maximum Hourly Emission Rate (lbs/hr): 5.27

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PTI A

To be entered upon final issuance

Emissions Unit ID: **K016**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 455

MAGLC (ug/m3): 2889

Pollutant: Stoddard Solvent

TLV (ug/m3): 525,000

Maximum Hourly Emission Rate (lbs/hr): 23.23

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2001

MAGLC (ug/m3): 12,500

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- a. changes in the composition of the materials used (typically for coatings 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 specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and
- d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;

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- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

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For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

**PART II: SPECIAL TERMS AND CONDITIONS [Continued]****A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Ten unit heatset web offset press	OAC rule 3745-31-05 (A)(3)  OAC rule 3745-35-07 (C)  OAC rule 3745-21-07 (G)(9)	Emissions of organic compounds shall not exceed 3.84 lbs/hr and 7.88 tons/yr;  Total organic compounds emissions from K001, K002, K004, K005, K011, K012, K013, K014, K015, K016, K017, K018, K019, K020 shall not exceed 99 tons per year based on a cumulative rolling 12-month summation;  See B.1-2.below.

**2. Additional Terms and Conditions**

**2.a** None

**B. Operational Restrictions**

- This facility shall employ only non-photochemically reactive materials as defined by Ohio Administrative Code (OAC) 3745-21-01 (C)(5).
- Total organic compounds emissions from K001, K002, K004, K005, K011-K020, shall not

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exceed 99 tons per year, based upon a cumulative rolling 12-month summation of the emission rates. A table delineating the emissions during the first 12-months is not necessary because records have been submitted to the Ohio EPA, Central District Office (CDO) which demonstrate past compliance with this limit.

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information on a facility wide basis for units K001, K002, K004, K005, K011-K020:
  - a. The company identification for each coating and cleanup material employed.
  - b. The number of gallons of each coating and cleanup material employed.
  - c. The organic compound content of each coating and cleanup material, in pounds per gallon.
  - d. The total monthly organic compound emission rate for all coatings and cleanup materials in pounds and tons.
  - e. The cumulative rolling 12-month summation of the organic compound emission rate for all coatings and cleanup materials in pounds and tons.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the cumulative rolling 12-month coating and cleanup emission limitation specified in E.2. These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(1).
2. The permittee shall notify the Director (Central District Office ) in writing of any monthly record showing the use of photochemically reactive materials. These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(1).

**E. Testing Requirements**

1. Emission Limitation -  
Emissions of organic compounds shall not exceed 3.84 lbs/hr and 7.88 tons/yr.

Applicable Compliance Method -

Compliance with the long term emission rate was calculated by dividing the actual annual press OC emissions (7372 lbs) by 2000 lbs per ton. Then multiplying that number by the maximum

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hours of operation per year (8760 hours) divided by the actual hours of operation (4100 hr).(ENVIROPRINT Ohio, 1995) This supplies the maximum tons per year that this unit can emit.

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Compliance with the short term emission rate was calculated by multiplying the tons per year maximum emissions of 7.88 tons per year by 2000 pounds per ton and dividing by the actual hours of operation (4100 hr/yr).

2. Emission Limitation -  
Emissions of organic compounds from this facility shall not exceed 99 tons per year based on a cumulative rolling 12-month summation of the monthly usage figures;

Applicable Compliance Method -  
Compliance shall be demonstrated by the record keeping specified in Part II.C.1.e.

## **F. Miscellaneous Requirements**

### Air Toxic Policy

This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: Isopropyl Alcohol

TLV (ug/m3): 983,000

Maximum Hourly Emission Rate (lbs/hr): 8

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 697

MAGLC (ug/m3): 23,405

Pollutant: 2-Butoxyethanol

TLV (ug/m3): 121,000

Maximum Hourly Emission Rate (lbs/hr): 5.27

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To be entered upon final issuance

Emissions Unit ID: **K017**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 455

MAGLC (ug/m3): 2889

Pollutant: Stoddard Solvent

TLV (ug/m3): 525,000

Maximum Hourly Emission Rate (lbs/hr): 23.23

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2001

MAGLC (ug/m3): 12,500

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- a. changes in the composition of the materials used (typically for coatings 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 specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and
- d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;

Emissions Unit ID: **K017**

- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

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To be entered upon final issuance

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

**PART II: SPECIAL TERMS AND CONDITIONS [Continued]**

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Ten unit heatset web offset press	OAC rule 3745-31-05 (A)(3)	Emissions of organic compounds shall not exceed 5.19 lbs/hr and 11.15 tons/yr;
	OAC rule 3745-35-07 (C)	Total organic compounds emissions from K001, K002, K004, K005, K011, K012, K013, K014, K015, K016, K017, K018, K019, K020 shall not exceed 99 tons per year based on a cumulative rolling 12-month summation;
	OAC rule 3745-21-07 (G)(9)	See B.1-2.below.

**2. Additional Terms and Conditions**

**2.a** None

**B. Operational Restrictions**

- This facility shall employ only non-photochemically reactive materials as defined by Ohio Administrative Code (OAC) 3745-21-01 (C)(5).
- Total organic compounds emissions from K001, K002, K004, K005, K011-K020, shall not

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Emissions Unit ID: **K018**

To be entered upon final issuance

exceed 99 tons per year, based upon a cumulative rolling 12-month summation of the emission rates. A table delineating the emissions during the first 12-months is not necessary because records have been submitted to the Ohio EPA, Central District Office (CDO) which demonstrate past compliance with this limit.

### **C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information on a facility wide basis for units K001, K002, K004, K005, K011-K020:
  - a. The company identification for each coating and cleanup material employed.
  - b. The number of gallons of each coating and cleanup material employed.
  - c. The organic compound content of each coating and cleanup material, in pounds per gallon.
  - d. The total monthly organic compound emission rate for all coatings and cleanup materials in pounds and tons.
  - e. The cumulative rolling 12-month summation of the organic compound emission rate for all coatings and cleanup materials in pounds and tons.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

### **D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the cumulative rolling 12-month coating and cleanup emission limitation specified in E.2. These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(1).
2. The permittee shall notify the Director (Central District Office ) in writing of any monthly record showing the use of photochemically reactive materials. These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(1).

### **E. Testing Requirements**

1. Emission Limitation -

Emissions Unit ID: **K018**

Emissions of organic compounds shall not exceed 5.19 lbs/hr and 11.15 tons/yr.

Applicable Compliance Method -

Compliance with the long term emission rate was calculated by dividing the actual annual press OC emissions (10,942 lbs) by 2000 lbs per ton. Then multiplying that number by the maximum hours of operation per year (8760 hours) divided by the actual hours of operation (4300 hr).(ENVIROPRINT Ohio, 1995) This supplies the maximum tons per year that this unit can emit.

Compliance with the short term emission rate was calculated by multiplying the tons per year maximum emissions of 11.15 tons per year by 2000 pounds per ton and dividing by the actual hours of operation (4300 hr/yr).

2. Emission Limitation -

Emissions of organic compounds from this facility shall not exceed 99 tons per year based on a cumulative rolling 12-month summation of the monthly usage figures;

Applicable Compliance Method -

Compliance shall be demonstrated by the record keeping specified in Part II.1.C.e.

**F. Miscellaneous Requirements**

Air Toxic Policy

This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: Isopropyl Alcohol

TLV (ug/m3): 983,000

Maximum Hourly Emission Rate (lbs/hr): 8

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Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 697

MAGLC (ug/m3): 23,405

Pollutant: 2-Butoxyethanol

TLV (ug/m3): 121,000

Maximum Hourly Emission Rate (lbs/hr): 5.27

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 455

MAGLC (ug/m3): 2889

Pollutant: Stoddard Solvent

TLV (ug/m3): 525,000

Maximum Hourly Emission Rate (lbs/hr): 23.23

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2001

MAGLC (ug/m3): 12,500

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- a. changes in the composition of the materials used (typically for coatings 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 specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and

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Emissions Unit ID: **K018**

- d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

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PTI Application: 01-00041  
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Facility ID: 0145020179

Emissions Unit ID: **K018**

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

**PART II: SPECIAL TERMS AND CONDITIONS [Continued]**

**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>
Twelve unit heatset web offset press	OAC rule 3745-31-05 (A)(3)	Emissions of organic compounds shall not exceed 5.47 lbs/hr and 13.40 tons/yr;
	OAC rule 3745-35-07 (C)	Total organic compounds emissions from K001, K002, K004, K005, K011, K012, K013, K014, K015, K016, K017, K018, K019, K020 shall not exceed 99 tons per year based on a cumulative rolling 12-month summation;
	OAC rule 3745-21-07 (G)(9)	See B.1-2.below.

**2. Additional Terms and Conditions**

2.a None

**B. Operational Restrictions**

1. This facility shall employ only non-photochemically reactive materials as defined by Ohio Administrative Code (OAC) 3745-21-01 (C)(5).

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To be entered upon final issuance

2. Total organic compounds emissions from K001, K002, K004, K005, K011-K020, shall not exceed 99 tons per year, based upon a cumulative rolling 12-month summation of the emission rates. A table delineating the emissions during the first 12-months is not necessary because records have been submitted to the Ohio EPA, Central District Office (CDO) which demonstrate past compliance with this limit.

### **C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information on a facility wide basis for units K001, K002, K004, K005, K011-K020:
  - a. The company identification for each coating and cleanup material employed.
  - b. The number of gallons of each coating and cleanup material employed.
  - c. The organic compound content of each coating and cleanup material, in pounds per gallon.
  - d. The total monthly organic compound emission rate for all coatings and cleanup materials in pounds and tons.
  - e. The cumulative rolling 12-month summation of the organic compound emission rate for all coatings and cleanup materials in pounds and tons.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

### **D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the cumulative rolling 12-month coating and cleanup emission limitation specified in E.2. These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(1).
2. The permittee shall notify the Director (Central District Office ) in writing of any monthly record showing the use of photochemically reactive materials. These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(1).

### **E. Testing Requirements**

1. Emission Limitation -  
Emissions of organic compounds shall not exceed 5.47 lbs/hr and 13.40 tons/yr.

Applicable Compliance Method -

Compliance with the long term emission rate was calculated by dividing the actual annual press OC emissions (14,973 lbs) by 2000 lbs per ton. Then multiplying that number by the maximum hours of operation per year (8760 hours) divided by the actual hours of operation (4900 hr).(ENVIROPRINT Ohio, 1995) This supplies the maximum tons per year that this unit can emit.

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Emissions Unit ID: **K019**

To be entered upon final issuance

Compliance with the short term emission rate was calculated by multiplying the tons per year maximum emissions of 13.40 tons per year by 2000 pounds per ton and dividing by the actual hours of operation (4900 hr/yr).

2. Emission Limitation -  
Emissions of organic compounds from this facility shall not exceed 99 tons per year based on a cumulative rolling 12-month summation of the monthly usage figures;

Applicable Compliance Method -

Compliance shall be demonstrated by the record keeping specified in Part II.C.1.e.

## **F. Miscellaneous Requirements**

### Air Toxic Policy

This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: Isopropyl Alcohol

TLV (ug/m3): 983,000

Maximum Hourly Emission Rate (lbs/hr): 8

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 697

MAGLC (ug/m3): 23,405

Pollutant: 2-Butoxyethanol

TLV (ug/m3): 121,000

Maximum Hourly Emission Rate (lbs/hr): 5.27

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PTI A

To be entered upon final issuance

Emissions Unit ID: **K019**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 455

MAGLC (ug/m3): 2889

Pollutant: Stoddard Solvent

TLV (ug/m3): 525,000

Maximum Hourly Emission Rate (lbs/hr): 23.23

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2001

MAGLC (ug/m3): 12,500

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- a. changes in the composition of the materials used (typically for coatings 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 specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and
- d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;

Emissions Unit ID: **K019**

- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

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Emissions Unit ID: **K019**

To be entered upon final issuance

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

**PART II: SPECIAL TERMS AND CONDITIONS [Continued]**

**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>
Twelve unit heatset web offset press	OAC rule 3745-31-05 (A)(3)	Emissions of organic compounds shall not exceed 6.06 lbs/hr and 13.34 tons/yr;
	OAC rule 3745-35-07 (C)	Total organic compounds emissions from K001, K002, K004, K005, K011, K012, K013, K014, K015, K016, K017, K018, K019, K020 shall not exceed 99 tons per year based on a cumulative rolling 12-month summation;
	OAC rule 3745-21-07 (G)(9)	See B.1-2.below.

**2. Additional Terms and Conditions**

2.a None

**B. Operational Restrictions**

1. This facility shall employ only non-photochemically reactive materials as defined by Ohio Administrative Code (OAC) 3745-21-01 (C)(5).
2. Total organic compounds emissions from K001, K002, K004, K005, K011-K020, shall not

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Emissions Unit ID: **K020**

To be entered upon final issuance

exceed 99 tons per year, based upon a cumulative rolling 12-month summation of the emission rates. A table delineating the emissions during the first 12-months is not necessary because records have been submitted to the Ohio EPA, Central District Office (CDO) which demonstrate past compliance with this limit.

### **C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information on a facility wide basis for units K001, K002, K004, K005, K011-K020:
  - a. The company identification for each coating and cleanup material employed.
  - b. The number of gallons of each coating and cleanup material employed.
  - c. The organic compound content of each coating and cleanup material, in pounds per gallon.
  - d. The total monthly organic compound emission rate for all coatings and cleanup materials in pounds and tons.
  - e. The cumulative rolling 12-month summation of the organic compound emission rate for all coatings and cleanup materials in pounds and tons.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

### **D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the cumulative rolling 12-month coating and cleanup emission limitation specified in E.2. These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(1).
2. The permittee shall notify the Director (Central District Office ) in writing of any monthly record showing the use of photochemically reactive materials. These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(1).

### **E. Testing Requirements**

1. Emission Limitation -

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Emissions Unit ID: **K020**

Emissions of organic compounds shall not exceed 6.06 lbs/hr and 13.34 tons/yr.

Applicable Compliance Method -

Compliance with the long term emission rate was calculated by dividing the actual annual press OC emissions (13,475 lbs) by 2000 lbs per ton. Then multiplying that number by the maximum hours of operation per year (8760 hours) divided by the actual hours of operation (4400 hr).(ENVIROPRINT Ohio, 1995) This supplies the maximum tons per year that this unit can emit.

Compliance with the short term emission rate was calculated by multiplying the tons per year maximum emissions of 13.34 tons per year by 2000 pounds per ton and dividing by the actual hours of operation (4400 hr/yr).

2. Emission Limitation -  
Emissions of organic compounds from this facility shall not exceed 99 tons per year based on a cumulative rolling 12-month summation of the monthly usage figures;

Applicable Compliance Method -  
Compliance shall be demonstrated by the record keeping specified in Part II.C.1.e.

## **F. Miscellaneous Requirements**

### Air Toxic Policy

This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: Isopropyl Alcohol

TLV (ug/m3): 983,000

Maximum Hourly Emission Rate (lbs/hr): 8

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 697

MAGLC (ug/m3): 23,405

Pollutant: 2-Butoxyethanol

TLV (ug/m3): 121,000

Maximum Hourly Emission Rate (lbs/hr): 5.27

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Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 455

MAGLC (ug/m3): 2889

Pollutant: Stoddard Solvent

TLV (ug/m3): 525,000

Maximum Hourly Emission Rate (lbs/hr): 23.23

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2001

MAGLC (ug/m3): 12,500

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- a. changes in the composition of the materials used (typically for coatings 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 specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and
- d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;

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- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

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For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.