



Environmental
Protection Agency

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

8/26/2010

JOHN PETERS
CENVEO
1635 COINING DR.
TOLEDO, OH 43612

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0448011240
Permit Number: P0106136
Permit Type: OAC Chapter 3745-31 Modification
County: Lucas

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Kevin Boyce," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

If you have any questions, please contact Toledo Department of Environmental Services at (419)936-3015 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPC Web page, www.epa.ohio.gov/dapc, by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

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

Cc: TDES

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	SYNTHETIC MINOR TO AVOID TITLE V
No	FEDERALLY ENFORCABLE PTIO (FEPTIO)



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
CENVEO**

Facility ID: 0448011240
Permit Number: P0106136
Permit Type: OAC Chapter 3745-31 Modification
Issued: 8/26/2010
Effective: 8/26/2010
Expiration: 11/4/2013



Division of Air Pollution Control
Permit-to-Install and Operate
for
CENVEO

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Authorization

Facility ID: 0448011240
Application Number(s): A0039233
Permit Number: P0106136
Permit Description: Modification to increase allowable ink and solvent usage.
Permit Type: OAC Chapter 3745-31 Modification
Permit Fee: \$600.00
Issue Date: 8/26/2010
Effective Date: 8/26/2010
Expiration Date: 11/4/2013
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

CENVEO
1635 COINING DR.
Toledo, OH 43612

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Toledo Department of Environmental Services
348 South Erie Street
Toledo, OH 43604
(419)936-3015

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Chris Korleski
Director



Authorization (continued)

Permit Number: P0106136

Permit Description: Modification to increase allowable ink and solvent usage.

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

Emissions Unit ID:	K002
Company Equipment ID:	K002
Superseded Permit Number:	04-01495
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K009
Company Equipment ID:	K009
Superseded Permit Number:	04-01495
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K012
Company Equipment ID:	K012
Superseded Permit Number:	P0103863
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Toledo Department of Environmental Services in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that

exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

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

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

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

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

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting¹ a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

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

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

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

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

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated

¹ Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.

C. Emissions Unit Terms and Conditions



1. K002, K002

Operations, Property and/or Equipment Description:

Harris M110 heatset offset web lithographic press with infrared dryer (3.14 mmBtu/hr) and catalytic thermal oxidizer (0.485 mmBtu/hr)

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

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

a. d)(9)

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T)	see b)(2)c. through b)(2)g.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01 (Indirect-fired dryer combustion stack and incinerator stack)	Carbon Monoxide (CO) emissions shall not exceed 0.30 pound per hour and 1.3 tons per year. Nitrogen oxides (NOx) emissions shall not exceed 0.36 pound per hour and 1.6 tons per year. Particulate emissions (PE) shall not exceed 0.01 pound per hour and 0.04 ton per year. Sulfur dioxide (SO2) emissions shall not exceed 0.002 lb/hr and 0.01 ton per year. see b)(2)a.
c.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	see b)(2)b.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the stack(s) serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
e.	OAC rule 3745-17-10(B)(1)	Particulate emissions from the indirect-fired dryer combustion stack shall not exceed 0.020 pound per million Btu of actual heat input.
f.	OAC rule 3745-17-11(B)(1)	Particulate emissions from the incinerator stack shall not exceed 4.6 pounds per hour.
g.	OAC rule 3745-18-06(B)	Exemption for units with a maximum rated heat input capacity of less than or equal to 10 mmBtu per hour heat input.
h.	ORC 3704.03(F)(3)(c) and F(4)	see d)(9)

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants emitted at less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limits/control measures no longer apply.

The following terms and conditions shall become void after U.S. EPA approves the rule revision:

b)(1)b., b)(2)a., b)(2)h., and f)(1)a. through f)(1)h.

- b. This paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology requirements under OAC rule 3745-31-05(A)(3) do not apply to the CO, NOx, PE and SO2 emissions from this air contaminant source since the uncontrolled potential to emit for CO, NOx, PE, and SO2 is less than 10 tons per year.

- c. The dryer shall be vented to a catalytic incinerator that shall reduce VOC emissions by at least ninety-five percent or maintain a maximum VOC outlet

concentration of twenty ppmv, as hexane (C₆H₁₄) on a dry basis, whichever is less stringent.

- d. The permittee shall meet i. or ii. below for the fountain solution used:
- i. if the fountain solution contains only alcohol substitutes, maintain the as-applied VOC content of the fountain solution at or below 5.0 per cent, by weight, and use no alcohol in the fountain solution.
 - ii. if the fountain solution contains alcohol:
 - (a) Maintain the as-applied VOC content of the fountain solution at or below 1.6 per cent, by weight; or
 - (b) Maintain the as-applied VOC content of the fountain solution at or below 3.0 per cent, by weight, and refrigerate the fountain solution to sixty degrees Fahrenheit or less.
- e. The permittee shall meet i. or ii. below for each cleaning solution used for cleaning on the press:
- i. Maintain the as-applied VOC content at or below seventy percent, by weight; or
 - ii. Maintain the as-applied VOC composite partial vapor pressure at or below ten mm Hg at twenty degrees Celsius (sixty-eight degrees Fahrenheit).
- The use of cleaning solutions not meeting the specifications of i. and ii. is permitted provided that the quantity used does not exceed one hundred ten gallons over any consecutive twelve-month period.
- f. The permittee shall keep all solvent containers closed at all times unless filling, draining, or performing cleanup operations.
- g. The permittee shall keep all solvent-laden shop towels in closed containers when not being used.
- h. The hourly and annual CO, NO_x, PE, and SO₂ emissions limits were established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this short term emissions limitation.

c) Operational Restrictions

- (1) The permittee shall burn only natural gas as fuel in this emissions unit.
- (2) The permittee shall maintain the dryer air pressure lower than the pressroom air pressure at all times the press is operating.

d) Monitoring and/or Recordkeeping Requirements

(1) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

(2) The permittee shall measure:

a. The VOC (alcohol) content, in accordance with OAC rule 3745-21-22(F)(2)(d), of any altered fountain solution, at the time of alteration, in percent by weight, of the fountain solution employed in the press and shall maintain records of the results of the measurements at the facility for a period of five years. The alcohol content of the fountain solution shall be measured using a hydrometer. The hydrometer shall have a visual, analog, or digital readout with an accuracy of 0.5 per cent; and a standard solution shall be used to calibrate the hydrometer for the type of alcohol used in the fountain solution.

b. On a daily basis, the temperature, in degrees Fahrenheit, of the fountain solution, if the permittee refrigerates the fountain solution in accordance with b)(2)d.ii.(b), and shall maintain records of the results of the measurements at the facility for a period of five years.

If the permittee elects to comply with the refrigerated fountain solution limitation specified under b)(2)d.ii.(b), then a thermometer or other temperature detection device capable of reading to 0.5 degrees Fahrenheit shall be used to ensure that any refrigerated fountain solution reservoirs are maintained at or below sixty degrees Fahrenheit at all times.

(3) The permittee shall maintain records, for a period of five years, of one of the following for fountain solution preparation:

a. When maintaining a recipe log for each batch of fountain solution prepared for use in the press:

i. A recipe log that identifies all recipes used to prepare the as-applied fountain solution. Each recipe shall be maintained in the recipe log for a period of five years from the date the recipe was last prepared for a press. Each recipe shall clearly identify the following:

(a) VOC content of each concentrated alcohol substitute, added to make the batch of fountain solution, based upon the manufacturer's laboratory analysis using USEPA method 24.

(b) The proportions in which the fountain solution is mixed, including the addition of alcohol and/or water. The proportion may be identified as a volume when preparing a discrete batch or may be identified as the settings when an automatic mixing unit is employed.

(c) The calculated VOC content of the final, mixed recipe.

- ii. Identification of the recipe used to prepare each batch of fountain solution for use in the press.
 - iii. The date and time when the batch was prepared.
 - iv. An affirmation the batch was prepared in accordance with the recipe.
- b. When not maintaining a recipe log in accordance with d)(3)a., for each batch of fountain solution prepared for use in the press
- i. The volume and VOC content of each concentrated alcohol substitute, added to make the batch of fountain solution, based upon the manufacturer's laboratory analysis using USEPA method 24.
 - ii. The volume of alcohol added to make the batch of fountain solution.
 - iii. The volume of water added to make the batch of fountain solution.
 - iv. The calculated VOC content of the final, mixed batch.
 - v. The date and time the batch was prepared.

For purposes of d)(3)a. and d)(3)b., a fountain solution that is continuously blended with an automatic mixing unit is considered to be the same batch until such time that the recipe or mix ratio is changed.

- (4) The permittee shall maintain records, for a period of five years, of a. or b. below for all cleaning solutions employed:
- a. When maintaining a recipe log for each batch of cleaning solution prepared:
 - i. A recipe log that identifies all recipes used to prepare the as-applied cleaning solution. Each recipe shall be maintained in the recipe log for a period of five years from the date the recipe was last prepared. Each recipe shall clearly identify the following:
 - (a) The VOC content of each cleaning solution, based upon the manufacturer's laboratory analysis using USEPA method 24; or
 - (b) The VOC composite partial vapor pressure of each cleaning solution, based upon the method under OAC rule 3745-21-22(F)(5).
 - ii. Identification of the recipe used to prepare each batch of cleaning solution.
 - iii. The date and time when the batch was prepared.
 - iv. An affirmation the batch was prepared in accordance with the recipe.

- b. When not maintaining a recipe log in accordance with d)(4)a., for each batch of cleaning solution prepared, records of the VOC content or VOC composite partial vapor pressure and the date and time the batch was prepared.
- (5) The permittee shall maintain monthly records of the following information:
 - a. The total amount, in gallons, of all the cleaning solutions employed; and
 - b. The total amount, in gallons, of all the cleaning solutions employed that exceeds the allowable VOC content or VOC composite vapor pressure.
- (6) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit(s) controlled by the catalytic incinerator is/are in operation, shall not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent emission test that demonstrated the emissions unit was in compliance.
- (7) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measure and record the temperature immediately upstream of the incinerator's catalyst bed at least once every fifteen minutes when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within ± 1 percent of the temperature being measured or ± 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder(s) shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:
 - a. all 3-hour blocks of time, when the emissions unit(s) controlled by the catalytic incinerator was/were in operation, during which the average temperature of the dryer exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature measured during the most recent emission test that demonstrated the emissions unit was in compliance;
 - b. a log or record of any time when the control device and/or, monitoring equipment, are not in operation when the press is in operation. The control device recordings will suffice in demonstrating the operating time of the associated emission unit provided that the incinerator cannot be bypassed.

These records shall be maintained at the facility for a period of no less than 5 years.
- (8) The catalyst bed material of the catalytic oxidizer shall be inspected annually for general catalyst condition and any signs of potential catalyst depletion. The permittee shall also collect a representative sample of the catalyst from the oxidizer, per manufacturer's recommendations, and have it tested to evaluate the catalyst's capability to continue to function at or above the required control efficiency. An evaluation of the catalyst bed material shall be conducted whenever the results of the inspection indicate signs of potential catalyst depletion or poor catalyst condition based on manufacturer's recommendations, but not less than once per year.

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

e) Reporting Requirements

- (1) The permittee shall notify the Director (the Toledo Division of Environmental Services) in writing of any of the following exceedances. The notification shall include a copy of such record and shall be sent to the Director (the Toledo Division of Environmental Services) within 45 days after the instance occurs, and it shall include a copy of the record showing the instance.
 - a. Each hydrometer measurement that shows an exceedance of the applicable alcohol content limitation specified in b)(2)d.i. and b)(2)d.ii., if determining fountain solution alcohol content via hydrometer measurement.
 - b. Each temperature reading that shows an exceedance of the temperature limitation specified in b)(2)d.ii.(b), if complying via refrigerated fountain solution.
 - c. Each calculated fountain solution VOC content that exceeds the VOC content limitation specified in b)(2)d.ii.
 - d. Each instance when an exceedance of the VOC content or VOC composite partial vapor pressure specified in b)(2)e. for cleaning solutions occurs.
 - e. All three-hour blocks of time when the emissions unit was in operation during which during which the average temperature of the exhaust gases immediately before the catalyst bed was below the temperature limitation specified in d)(6).
- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (3) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the catalytic incinerator during the 12-month reporting period for this emissions unit(s):
 - a. each three-hour block of time (start time and date, and end time and date) when the average temperature of the exhaust gases immediately before the catalyst bed was outside of the acceptable range;

- b. any period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to the catalytic incinerator;
 - c. the results of the catalyst activity test(s) along with a summary of the results of the annual inspection of the internal integrity of the catalytic incinerator.
- (4) The permittee shall identify in the annual permit evaluation report each day when a fuel other than natural gas was burned in this emissions unit.
- (5) The permittee shall identify the following in the annual permit evaluation report.
- a. Each hydrometer measurement that shows an exceedance of the applicable alcohol content limitation specified in b)(2)d.i. and b)(2)d.ii. and a copy of each such record, if determining fountain solution alcohol content via hydrometer measurement.
 - b. Each temperature reading that shows an exceedance of the temperature limitation specified in b)(2)d.ii.(b) and a copy of each such record, if complying via refrigerated fountain solution.
 - c. Each calculated fountain solution VOC content that exceeds the VOC content limitation specified in b)(2)d.ii. and a copy of each such record.
 - d. Each instance when an exceedance of the VOC content or VOC composite partial vapor pressure specified in b)(2)e. for cleaning solutions occurs and a copy of each such record.
- f) Testing Requirements
- (1) Compliance with the emission limitation(s) in b) of these terms and conditions shall be determined in accordance with the following method(s):
- a. CO emissions shall not exceed 0.30 pound per hour.

Applicable Compliance Method:

Compliance may be determined by the following emission calculation. Multiply the maximum natural gas usage of the dryer and catalytic incinerator ((3.14 mmBtu/hr + 0.485 mmBtu/hr) / 1020 mmBtu/mmscf) by the CO emission factor from AP-42 Table 1.4-1 dated 7/98 (84 lb/mmscf) to obtain the maximum hourly CO emissions.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Methods 1 through 4 and 10 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA.
 - b. Emission Limitation:

CO emissions shall not exceed 1.3 tons per year.

Applicable Compliance Method:

Compliance may be determined by the following one-time calculation. Multiply the maximum hourly emission rate (0.30 lb/hr) by the maximum annual hours of operation (8,760 hrs/yr) and divide by 2,000 pounds per ton.

c. Emission Limitation:

NOx emissions shall not exceed 0.36 pound per hour

Applicable Compliance Method:

Compliance may be determined by the following emission calculation. Multiply the maximum natural gas usage of the dryer and catalytic incinerator ((3.14 mmBtu/hr + 0.485 mmBtu/hr) / 1020 mmBtu/mmscf) by the NOx emission factor from AP-42 Table 1.4-1 dated 7/98 (100 lb/mmscf) to obtain the maximum hourly NOx emissions.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Methods 1 through 4 and 7 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA.

d. Emission Limitation:

NOx emissions shall not exceed 1.6 tons per year

Applicable Compliance Method:

Compliance may be determined by the following one-time calculation. Multiply the maximum hourly emission rate (0.36 lb/hr) by the maximum annual hours of operation (8,760 hrs/yr) and divide by 2,000 pounds per ton.

e. Emission Limitation:

PE shall not exceed 0.01 pound per hour.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Methods 1 through 5 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA.

f. Emission Limitation:

PE shall not exceed 0.04 ton per year

Applicable Compliance Method:

Compliance may be determined by the following one-time calculation. Multiply the allowable hourly emission rate (0.01 lb/hr) by the maximum annual operating hours (8,760 hrs/yr) and divide by 2,000 pounds per ton.

g. Emission Limitation:

SO₂ emissions shall not exceed 0.002 lb/hr

Applicable Compliance Method:

Compliance may be determined by the following emission calculation. Multiply the maximum natural gas usage of the dryer and catalytic incinerator ((3.14 mmBtu/hr + 0.485 mmBtu/hr) / 1020 mmBtu/mmscf) by the SO₂ emission factor from AP-42 Table 1.4-2 dated 7/98 (0.6 lb/mmscf) to obtain the maximum hourly SO₂ emissions.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Methods 1 through 4 and 6 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA.

h. Emission Limitation:

SO₂ emissions shall not exceed 0.01 ton per year

Applicable Compliance Method:

Compliance may be determined by the following one-time calculation. Multiply the allowable hourly emission rate (0.002 lb/hr) by the maximum annual operating hours (8,760 hrs/yr) and divide by 2,000 pounds per ton.

i. Emission Limitation:

Particulate emissions shall not exceed 0.020 pound per million Btu of actual heat input

Applicable Compliance Method:

Compliance may be demonstrated by dividing the filterable particulate matter emission from AP-42 Table 1.4-2 dated 7/98 (1.9 lb/mmscf) by the heating value of natural gas (1,020 mmBtu/mmscf).

If required, the permittee shall demonstrate compliance using the procedures specified in OAC rule 3745-17-03(B)(9).

j. Emission Limitation:

Visible particulate emissions from any/the stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method

Compliance shall be determined through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A.

k. Emission Limitation:

95% control efficiency for the dryer or maximum VOC outlet concentration of 20 ppmv, as hexane on a dry basis

Applicable Compliance Method:

If required, the control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-22(F)(1)(a) through (F)(1)(c) or an alternative test protocol approved by the Ohio EPA.

l. Emission Limitation:

Particulate emissions from the stack serving this emissions unit shall not exceed 4.6 pounds per hour.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 5 of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(10). Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

m. Emission Limitation:

VOC content limitation of the as-applied fountain solution specified in b)(2)d.,

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance according to the procedure specified in OAC rule 3745-21-22(F)(2)(a) through (d) or an alternative test protocol approved by the Ohio EPA..

n. Emission Limitation:

VOC content of cleaning solution limitation specified in b)(2)e.i.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance according to the procedure specified in OAC rule 3745-21-22(F)(4)(a) through (c) or an alternative test protocol approved by the Ohio EPA.

- o. Emission Limitation:

VOC composite partial vapor pressure of cleaning solution limitation specified in b)(2)e.ii.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance using the procedures specified under OAC rule 3745-21-22(F)(5) or an alternative test protocol approved by the Ohio EPA.
 - p. Emission Limitation:

The permittee shall maintain the dryer air pressure lower than the pressroom air pressure at all times the press is operating.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance using an airflow direction indicator, such as a smoke stick or aluminum ribbons, or differential pressure gauge. Capture efficiency testing is not required.
- (2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- a. The emission testing shall be conducted within 6 months after issuance of the permit and within 6 months prior to permit renewal.
 - b. The emission testing shall be conducted to demonstrate compliance with the 95% VOC control efficiency requirement for the dryer.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

The methods and procedures referenced under OAC rule 3745-21-22(F)(1)(a) through (c).

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
 - d. The test(s) shall be conducted while the emissions unit is operating at typical operating conditions and flow rates compatible with scheduled production, unless otherwise specified or approved by the Toledo Division of Environmental Services.
 - e. Using catalytic incinerator temperature chart recorder data obtained during emission testing, the permittee shall determine the 3-hour average temperature immediately upstream of the catalyst bed, and include the 3-hour average temperature value in the written test report. A copy of the temperature chart recorder data during emission testing shall also be included in the written test report.

- f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Toledo Division of Environmental Services. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
 - g. Personnel from the Toledo Division of Environmental Services shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
 - h. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Toledo Division of Environmental Services within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Toledo Division of Environmental Services.
- (3) The permittee shall conduct, or have conducted, catalyst activity testing using the catalyst sample collected during the annual inspection described in this permit. An intent to test notification shall not be required for catalyst activity testing. The procedures for the catalyst activity test shall be conducted in accordance with the manufacturer's recommendations and as required by the appropriate test method.
- g) **Miscellaneous Requirements**
- (1) None.



2. K009, K009

Operations, Property and/or Equipment Description:

KBA Rapida 162 non-heatset sheetfed lithographic printing press

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

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

a. d)(6)

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T)	see b)(2)a. and b)(2)b.
b.	ORC 3704.03(F)(3)(c) and F(4)	see d)(6)

(2) Additional Terms and Conditions

a. The permittee shall meet i. or ii. below for the fountain solution used:

i. If the fountain solution contains only alcohol substitutes, maintain the as-applied VOC content of the fountain solution at or below 5.0 percent, by weight.

ii. If the fountain solution contains alcohol:

(a) maintain the as-applied VOC content of the fountain solution at or below 5.0 percent, by weight; or

(b) maintain the as-applied VOC content of the fountain solution at or below 8.5 percent, by weight, and refrigerate the solution to 60 degrees Fahrenheit or less.

- b. The permittee shall meet the following requirements for cleanup materials used:
- i. Maintain the as-applied VOC content of each cleaning solution at or below 70 percent, by weight or maintain the as-applied VOC composite partial vapor pressure at or below 10 mmHg at 20 degrees Celsius (68 degrees Fahrenheit).
 - ii. The use of cleaning materials not meeting the specifications of b)(2)b.i. is permitted provided that the quantity used does not exceed 110 gallons over any consecutive 12-month period.
 - iii. Keep all solvent containers closed at all times unless filling, draining, or performing cleanup operations.
 - iv. Keep all solvent-laden shop towels in closed containers when not being used.
- c) Operational Restrictions
- (1) None.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall collect and record the following information for each month for this emissions unit:
 - a. The company identification for each ink, coating, fountain solution, and cleanup material employed.
 - b. The number of gallons of each ink, coating, fountain solution, and cleanup material employed.
 - c. The VOC content of each ink, coating, fountain solution and cleanup material, in pounds per gallon. The permittee may calculate the monthly usage for this emissions unit according to the procedure outlined in Engineering Guide #68.
 - d. Weight percent alcohol content of fountain solution.
 - e. Vapor pressure of cleanup materials employed.

The annual VOC emissions calculated according to the Enviroprint calculation referenced in Engineering Guide #68. [Note: The ink and coating information must be for the materials as employed, including any thinning solvents added at the emissions unit.]
 - (2) The permittee shall measure:
 - a. The VOC (alcohol) content, in accordance with OAC rule 3745-21-22(F)(2)(d), of any altered fountain solution, at the time of alteration, in percent by weight, of the fountain solution employed in the press and shall maintain records of the results of the measurements at the facility for a period of five years. The alcohol content of the fountain solution shall be measured using a hydrometer. The hydrometer

shall have a visual, analog, or digital readout with an accuracy of 0.5 per cent; and a standard solution shall be used to calibrate the hydrometer for the type of alcohol used in the fountain solution.

- b. On a daily basis, the temperature, in degrees Fahrenheit, of the fountain solution, if the permittee refrigerates the fountain solution in accordance with b)(2)a.ii.(b), and shall maintain records of the results of the measurements at the facility for a period of five years.

If the permittee elects to comply with the refrigerated fountain solution limitation specified under b)(2)a.ii.(b), then a thermometer or other temperature detection device capable of reading to 0.5 degrees Fahrenheit shall be used to ensure that any refrigerated fountain solution reservoirs are maintained at or below sixty degrees Fahrenheit at all times.

- (3) The permittee shall maintain records, for a period of five years, of a. or b. below for fountain solution preparation:

- a. When maintaining a recipe log for each batch of fountain solution prepared for use in the press:

- i. A recipe log that identifies all recipes used to prepare the as-applied fountain solution. Each recipe shall be maintained in the recipe log for a period of five years from the date the recipe was last prepared for a press. Each recipe shall clearly identify the following:

(a) VOC content of each concentrated alcohol substitute, added to make the batch of fountain solution, based upon the manufacturer's laboratory analysis using USEPA method 24.

(b) The proportions in which the fountain solution is mixed, including the addition of alcohol and/or water. The proportion may be identified as a volume when preparing a discrete batch or may be identified as the settings when an automatic mixing unit is employed.

(c) The calculated VOC content of the final, mixed recipe.

- ii. Identification of the recipe used to prepare each batch of fountain solution for use in the press.

- iii. The date and time when the batch was prepared.

- iv. An affirmation the batch was prepared in accordance with the recipe.

- b. When not maintaining a recipe log in accordance with d)(3)a., for each batch of fountain solution prepared for use in the press

- i. The volume and VOC content of each concentrated alcohol substitute, added to make the batch of fountain solution, based upon the manufacturer's laboratory analysis using USEPA method 24.

- ii. The volume of alcohol added to make the batch of fountain solution.
- iii. The volume of water added to make the batch of fountain solution.
- iv. The calculated VOC content of the final, mixed batch.
- v. The date and time the batch was prepared.

For purposes of d)(3)a. and d)(3)b., a fountain solution that is continuously blended with an automatic mixing unit is considered to be the same batch until such time that the recipe or mix ratio is changed.

- (4) The permittee shall maintain records, for a period of five years, of a. or b. below for all cleaning solutions employed:
 - a. When maintaining a recipe log for each batch of cleaning solution prepared:
 - i. A recipe log that identifies all recipes used to prepare the as-applied cleaning solution. Each recipe shall be maintained in the recipe log for a period of five years from the date the recipe was last prepared. Each recipe shall clearly identify the following:
 - (a) The VOC content of each cleaning solution, based upon the manufacturer's laboratory analysis using USEPA method 24; or
 - (b) The VOC composite partial vapor pressure of each cleaning solution, based upon the method under OAC rule 3745-21-22(F)(5).
 - ii. Identification of the recipe used to prepare each batch of cleaning solution.
 - iii. The date and time when the batch was prepared.
 - iv. An affirmation the batch was prepared in accordance with the recipe.
 - b. When not maintaining a recipe log in accordance with d)(4)a., for each batch of cleaning solution prepared, records of the VOC content or VOC composite partial vapor pressure and the date and time the batch was prepared.
- (5) The permittee shall maintain monthly records of the following information:
 - a. The total amount, in gallons, of all the cleaning solutions employed; and
 - b. The total amount, in gallons, of all the cleaning solutions employed that exceeds the allowable VOC content or VOC composite vapor pressure.
- (6) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified PTIO prior to making a "modification" as defined by OAC rule

3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTIO.

e) Reporting Requirements

- (1) The permittee shall notify the Director (the Toledo Division of Environmental Services) in writing of any of the following exceedances. The notification shall include a copy of such record and shall be sent to the Director (the Toledo Division of Environmental Services) within 45 days after the instance occurs, and it shall include a copy of the record showing the instance.
 - a. If determining fountain solution alcohol content via hydrometer measurement, each hydrometer measurement that shows an exceedance of the applicable alcohol content limitation specified in b)(2)a.i. and b)(2)a.ii.
 - b. If complying via refrigerated fountain solution, each temperature reading that shows an exceedance of the temperature limitation specified in b)(2)a.ii.(b).
 - c. Each calculated fountain solution VOC content that exceeds the VOC content limitation specified in b)(2)a.ii.
 - d. Each instance when an exceedance of the VOC content or VOC composite partial vapor pressure specified in b)(2)b. for cleaning solutions occurs.
- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (3) The permittee shall identify the following in the annual permit evaluation report.
 - a. Each hydrometer measurement that shows an exceedance of the applicable alcohol content limitation specified in b)(2)a.i. and b)(2)a.ii. and a copy of each such record, if determining fountain solution alcohol content via hydrometer measurement.
 - b. Each temperature reading that shows an exceedance of the temperature limitation specified in b)(2)a.ii.(b) and a copy of each such record, if complying via refrigerated fountain solution.
 - c. Each calculated fountain solution VOC content that exceeds the VOC content limitation specified in b)(2)a.ii. and a copy of each such record.
 - d. Each instance when an exceedance of the VOC content or VOC composite partial vapor pressure specified in b)(2)b. for cleaning solutions occurs and a copy of each such record.

f) Testing Requirements

(1) Compliance with the emission limitation(s) in b) of these terms and conditions shall be determined in accordance with the following method(s):

a. Emission Limitation:

VOC content limitation of the as-applied fountain solution specified in b)(2)a.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance according to the procedure specified in OAC rule 3745-21-22(F)(2)(a) through (d) or an alternative test protocol approved by the Ohio EPA.

b. Emission Limitation:

VOC content of cleaning solution limitation specified in b)(2)b.i.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance according to the procedure specified in OAC rule 3745-21-22(F)(4)(a) through (c) or an alternative test protocol approved by the Ohio EPA.

c. Emission Limitation:

VOC composite partial vapor pressure of cleaning solution limitation specified in b)(2)b.i.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance using the procedures specified under OAC rule 3745-21-22(F)(5) or an alternative test protocol approved by the Ohio EPA.

g) Miscellaneous Requirements

(1) None.



3. K012, K012

Operations, Property and/or Equipment Description:

Manroland 906/8LV non-heatset sheetfed lithographic printing press

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

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

a. d)(6)

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T)	see b)(2)a. and b)(2)b.
b.	ORC 3704.03(F)(3)(c) and F(4)	see d)(6)

(2) Additional Terms and Conditions

a. The permittee shall meet i. or ii. below for the fountain solution used:

i. If the fountain solution contains only alcohol substitutes, maintain the as-applied VOC content of the fountain solution at or below 5.0 percent, by weight.

ii. If the fountain solution contains alcohol:

(a) maintain the as-applied VOC content of the fountain solution at or below 5.0 percent, by weight; or

(b) maintain the as-applied VOC content of the fountain solution at or below 8.5 percent, by weight, and refrigerate the solution to 60 degrees Fahrenheit or less.

- b. The permittee shall meet the following requirements for cleanup materials used:
- i. Maintain the as-applied VOC content of each cleaning solution at or below 70 percent, by weight or maintain the as-applied VOC composite partial vapor pressure at or below 10 mmHg at 20 degrees Celsius (68 degrees Fahrenheit).
 - ii. The use of cleaning materials not meeting the specifications of b)(2)b.i. is permitted provided that the quantity used does not exceed 110 gallons over any consecutive 12-month period.
 - iii. Keep all solvent containers closed at all times unless filling, draining, or performing cleanup operations.
 - iv. Keep all solvent-laden shop towels in closed containers when not being used.
- c) Operational Restrictions
- (1) None.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall collect and record the following information for each month for this emissions unit:
 - a. The company identification for each ink, coating, fountain solution, and cleanup material employed.
 - b. The number of gallons of each ink, coating, fountain solution, and cleanup material employed.
 - c. The VOC content of each ink, coating, fountain solution and cleanup material, in pounds per gallon. The permittee may calculate the monthly usage for this emissions unit according to the procedure outlined in Engineering Guide #68.
 - d. Weight percent alcohol content of fountain solution.
 - e. Vapor pressure of cleanup materials employed.
 - f. The monthly VOC emissions calculated according to the Enviroprint calculation referenced in Engineering Guide #68.
- [Note: The ink and coating information must be for the materials as employed, including any thinning solvents added at the emissions unit.]
- (2) The permittee shall measure:
 - a. The VOC (alcohol) content, in accordance with OAC rule 3745-21-22(F)(2)(d), of any altered fountain solution, at the time of alteration, in percent by weight, of the fountain solution employed in the press and shall maintain records of the results of the measurements at the facility for a period of five years. The alcohol content

of the fountain solution shall be measured using a hydrometer. The hydrometer shall have a visual, analog, or digital readout with an accuracy of 0.5 per cent; and a standard solution shall be used to calibrate the hydrometer for the type of alcohol used in the fountain solution.

- b. On a daily basis, the temperature, in degrees Fahrenheit, of the fountain solution, if the permittee refrigerates the fountain solution in accordance with b)(2)a.ii.(b), and shall maintain records of the results of the measurements at the facility for a period of five years.

If the permittee elects to comply with the refrigerated fountain solution limitation specified under b)(2)a.ii.(b), then a thermometer or other temperature detection device capable of reading to 0.5 degrees Fahrenheit shall be used to ensure that any refrigerated fountain solution reservoirs are maintained at or below sixty degrees Fahrenheit at all times.

- (3) The permittee shall maintain records, for a period of five years, of one of the following for fountain solution preparation:

- a. When maintaining a recipe log for each batch of fountain solution prepared for use in the press:

- i. A recipe log that identifies all recipes used to prepare the as-applied fountain solution. Each recipe shall be maintained in the recipe log for a period of five years from the date the recipe was last prepared for a press. Each recipe shall clearly identify the following:

(a) VOC content of each concentrated alcohol substitute, added to make the batch of fountain solution, based upon the manufacturer's laboratory analysis using USEPA method 24.

(b) The proportions in which the fountain solution is mixed, including the addition of alcohol and/or water. The proportion may be identified as a volume when preparing a discrete batch or may be identified as the settings when an automatic mixing unit is employed.

(c) The calculated VOC content of the final, mixed recipe.

- ii. Identification of the recipe used to prepare each batch of fountain solution for use in the press.

- iii. The date and time when the batch was prepared.

- iv. An affirmation the batch was prepared in accordance with the recipe.

- b. When not maintaining a recipe log in accordance with d)(3)a., for each batch of fountain solution prepared for use in the press:

- i. The volume and VOC content of each concentrated alcohol substitute, added to make the batch of fountain solution, based upon the manufacturer's laboratory analysis using USEPA method 24.

- ii. The volume of alcohol added to make the batch of fountain solution.
- iii. The volume of water added to make the batch of fountain solution.
- iv. The calculated VOC content of the final, mixed batch.
- v. The date and time the batch was prepared.

For purposes of d)(3)a. and d)(3)b., a fountain solution that is continuously blended with an automatic mixing unit is considered to be the same batch until such time that the recipe or mix ratio is changed.

- (4) The permittee shall maintain records, for a period of five years, of a. or b. below for all cleaning solutions employed:
 - a. When maintaining a recipe log for each batch of cleaning solution prepared:
 - i. A recipe log that identifies all recipes used to prepare the as-applied cleaning solution. Each recipe shall be maintained in the recipe log for a period of five years from the date the recipe was last prepared. Each recipe shall clearly identify the following:
 - (a) The VOC content of each cleaning solution, based upon the manufacturer's laboratory analysis using USEPA method 24; or
 - (b) The VOC composite partial vapor pressure of each cleaning solution, based upon the method under OAC rule 3745-21-22(F)(5).
 - ii. Identification of the recipe used to prepare each batch of cleaning solution.
 - iii. The date and time when the batch was prepared.
 - iv. An affirmation the batch was prepared in accordance with the recipe.
 - b. When not maintaining a recipe log in accordance with d)(4)a., for each batch of cleaning solution prepared, records of the VOC content or VOC composite partial vapor pressure and the date and time the batch was prepared.
- (5) The permittee shall maintain monthly records of the following information:
 - a. The total amount, in gallons, of all the cleaning solutions employed; and
 - b. The total amount, in gallons, of all the cleaning solutions employed that exceeds the allowable VOC content or VOC composite vapor pressure.
- (6) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified PTIO prior to making a "modification" as defined by OAC rule

3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTIO.

e) Reporting Requirements

- (1) The permittee shall notify the Director (the Toledo Division of Environmental Services) in writing of any of the following exceedances. The notification shall include a copy of such record and shall be sent to the Director (the Toledo Division of Environmental Services) within 45 days after the instance occurs, and it shall include a copy of the record showing the instance.
 - a. If determining fountain solution alcohol content via hydrometer measurement, each hydrometer measurement that shows an exceedance of the applicable alcohol content limitation specified in b)(2)a.i. and b)(2)a.ii.
 - b. If complying via refrigerated fountain solution, each temperature reading that shows an exceedance of the temperature limitation specified in b)(2)a.ii.(b).
 - c. Each calculated fountain solution VOC content that exceeds the VOC content limitation specified in b)(2)a.ii.
 - d. Each instance when an exceedance of the VOC content or VOC composite partial vapor pressure specified in b)(2)b. for cleaning solutions occurs.
- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (3) The permittee shall identify the following in the annual permit evaluation report.
 - a. Each hydrometer measurement that shows an exceedance of the applicable alcohol content limitation specified in b)(2)a.i. and b)(2)a.ii. and a copy of each such record, if determining fountain solution alcohol content via hydrometer measurement,
 - b. Each temperature reading that shows an exceedance of the temperature limitation specified in b)(2)a.ii.(b) and a copy of each such record, if complying via refrigerated fountain solution.
 - c. Each calculated fountain solution VOC content that exceeds the VOC content limitation specified in b)(2)a.ii. and a copy of each such record.
 - d. Each instance when an exceedance of the VOC content or VOC composite partial vapor pressure specified in b)(2)b. for cleaning solutions occurs and a copy of each such record.

f) Testing Requirements

(1) Compliance with the emission limitation(s) in b) of these terms and conditions shall be determined in accordance with the following method(s):

a. Emission Limitation:

VOC content limitation of the as-applied fountain solution specified in b)(2)a.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance according to the procedure specified in OAC rule 3745-21-22(F)(2)(a) through (d) or an alternative test protocol approved by the Ohio EPA..

b. Emission Limitation:

VOC content of cleaning solution limitation specified in b)(2)b.i.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance according to the procedure specified in OAC rule 3745-21-22(F)(4)(a) through (c) or an alternative test protocol approved by the Ohio EPA.

c. Emission Limitation:

VOC composite partial vapor pressure of cleaning solution limitation specified in b)(2)b.i.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance using the procedures specified under OAC rule 3745-21-22(F)(5) or an alternative test protocol approved by the Ohio EPA.

g) Miscellaneous Requirements

(1) None.