



Environmental
Protection Agency

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

12/13/2010

Certified Mail

Mr. Greg Tisone
Card Pak Incorporated
29601 Solon Rd
Solon, OH 44139

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 1318538170
Permit Number: P0107184
Permit Type: Initial Installation
County: Cuyahoga

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it 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

The Ohio EPA is encouraging 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 Compliance Assistance and Pollution Prevention at (614) 644-3469. If you have any questions regarding this permit, please contact the Cleveland Division of Air Quality. This permit can be accessed electronically on the Division of Air Pollution Control (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: U.S. EPA
CDAQ; Pennsylvania; Canada



FINAL

**Division of Air Pollution Control
Permit-to-Install
for
Card Pak Incorporated**

Facility ID: 1318538170
Permit Number: P0107184
Permit Type: Initial Installation
Issued: 12/13/2010
Effective: 12/13/2010



Division of Air Pollution Control
Permit-to-Install
for
Card Pak Incorporated

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Authorization

Facility ID: 1318538170
Facility Description: Commercial Lithographic Printing Operations
Application Number(s): A0040513
Permit Number: P0107184
Permit Description: Initial installation of a KBA brand 10-color non heat-set offset sheet-fed printing press
Permit Type: Initial Installation
Permit Fee: \$200.00
Issue Date: 12/13/2010
Effective Date: 12/13/2010

This document constitutes issuance to:

Card Pak Incorporated
29601 Solon Rd
Solon, OH 44139-3451

of a Permit-to-Install 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:

Cleveland Division of Air Quality
2nd Floor
75 Erievue Plaza
Cleveland, OH 44114
(216)664-2297

The above named entity is hereby granted a Permit-to-Install for the 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 emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency



Chris Korleski
Director



Authorization (continued)

Permit Number: P0107184

Permit Description: Initial installation of a KBA brand 10-color non heat-set offset sheet-fed printing press

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

Emissions Unit ID:

K005

Company Equipment ID:

10-color KBA Offset Sheetfed Printing Press

Superseded Permit Number:

General Permit Category and Type: Not Applicable

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
 - (1) Standard Term and Condition A.2.a), Severability Clause
 - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
 - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
 - (4) Standard Term and Condition A.9., Reporting Requirements
 - (5) Standard Term and Condition A.10., Applicability
 - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
 - (7) Standard Term and Condition A.14., Public Disclosure
 - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (9) Standard Term and Condition A.16., Fees
 - (10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

- a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

- a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.

- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) 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 or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

4. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.
- b) 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.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Cleveland Division of Air Quality.

- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Cleveland Division of Air Quality. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.
 - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Cleveland Division of Air Quality every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - (4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

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, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Cleveland Division of Air Quality in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

6. Compliance Requirements

- a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.
- b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- c) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

- (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- d) The permittee shall submit progress reports to the Cleveland Division of Air Quality concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

8. 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.

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Cleveland Division of Air Quality.

- 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 state-only required 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 Cleveland Division of Air Quality. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

10. 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).

11. Construction of New Sources(s) and Authorization to Install

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. 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 this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. 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.

- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., 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) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in Ohio EPA's "Air Services" 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).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., 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). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

13. Construction Compliance Certification

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.

- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. 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.

15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

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., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

16. 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 any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in Air Services once the transfer is legally completed. The change must be submitted through Air Services within thirty days of the ownership transfer date.

18. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

19. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) None.

C. Emissions Unit Terms and Conditions



1. K005, 10-color KBA Offset Sheetfed Printing Press

Operations, Property and/or Equipment Description:

10-Color KBA Offset Sheetfed Printing Press with Inline Water Coater

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) g)(2)

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)	Volatile Organic Compound (VOC) emissions shall not exceed 12.27 tons per rolling 12- month period. See c)(3).
b.	OAC rule 3745-21-22 Reasonably Available Control Technology (RACT)	See b)(2), c)(1)-(2), d)(2)-(6), e)(3)-(4), f)(1)b.-f)(1)e.
c.	OAC rule 3745-114-01	See g)(2)

(2) Additional Terms and Conditions

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

b. If the fountain solution contains alcohol the permittee shall:

i. Maintain the as-applied VOC content below 5.0 percent, by weight; or

ii. Maintain the as-applied VOC content at or below 8.5 percent by weight, and refrigerate the fountain solution to 60 degrees Fahrenheit or less.

c. The permittee shall meet one of the following requirements for each cleaning solution used for cleaning on the emissions unit:

i. maintain the as-applied VOC content at or below 70 percent, by weight; or

ii. maintain the as-applied VOC composite partial vapor pressure at or below 10 mm Hg at 20 degrees Celsius (68 degrees Fahrenheit).

The use of cleaning solutions not meeting the specifications of b)(2)c. is permitted provided that the quantity used does not exceed 110 gallons over any consecutive 12-month period.

c) Operational Restrictions

- (1) The permittee shall keep all solvent containers closed at all times unless, filling, draining, or performing cleanup operations.
- (2) The permittee shall keep all solvent-laden shop towels in closed containers when not being used.
- (3) The facility has taken voluntary restrictions on the following materials:
 - a. fountain solution consumption shall not exceed 500 gallons per rolling 12-month period;
 - b. inline solution consumption shall not exceed 6000 gallons per rolling 12-month period; and
 - c. cleanup material consumption shall not exceed 500 gallons per rolling 12-month period.

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 of each ink, coating, fountain solution and cleanup material;
 - b. the amount, in gallons, of each ink, coating, fountain solution and cleanup material employed; and
 - c. the VOC content of each ink, coating, fountain solution and cleanup material employed, in weight percent.
- (2) The owner or operator of a subject offset lithographic or letterpress printing press shall maintain records, for a period of five years, of one of the following for all cleaning solutions employed in all the offset lithographic and letterpress printing operations:
 - a. For an owner or operator 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 paragraph (F)(5) of OAC rule 3745-21-22.
 - 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. For an owner or operator not maintaining a recipe log in accordance with paragraph (G)(5)(a) of OAC rule 3745-21-22, 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.
- (3) The owner or operator of a subject offset lithographic or letterpress printing press 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.
- (4) For a fountain solution containing alcohol, when adding alcohol to a batch previously tested in accordance with OAC rule 3745-21-22 (F)(2), the permittee shall measure the VOC (alcohol) content of any altered fountain solution, at the time of alteration, in percent weight, of the fountain solution employed in the press:
 - a. 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 percent.
 - b. A standard solution shall be used to calibrate the hydrometer for the type of alcohol used in the fountain solution.
 - c. The permittee shall maintain records of the results of the measurements at the facility for a period of five years.
- (5) For a fountain solution that contains alcohol and is refrigerated to comply with condition b)(2)(c)(ii):
 - a. measure on a daily basis the temperature, in degrees Fahrenheit, of the fountain solution; and
 - b. maintain records of the results of the measurements at the facility for a period of five years.

- (6) The permittee shall maintain records for a period of five years one of the following for fountain solution preparation:
- a. For an owner or operator 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. For an owner or operator not maintaining a recipe log in accordance with paragraph (G)(3)(a) of OAC rule 3745-21-22, 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 paragraphs (G)(3)(a) and (G)(3)(b) of OAC rule 3745-21-22, 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.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. any exceedance of the rolling 12-month VOC emission limitation;
 - b. any exceedance of the material usage limits as specified in c)(3); and
 - c. any deviation of a requirement specified in OAC rule 3745-21-22.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

- (2) The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).
- (3) The permittee shall notify the CDAQ of the following exceedances. Each notification shall be submitted to the CDAQ within forty-five 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)a. or b.;
 - b. each temperature reading that shows an exceedance of the temperature limitation specified in b)(2)b.;
 - c. each calculated VOC content that exceeds the VOC content limitation specified in b)(2)b.; and
 - d. each instance when an exceedance of the VOC content or VOC composite partial vapor pressure as specified for each cleaning material in b)(2)c.
- (4) The permittee shall submit any required compliance certifications in accordance with OAC rule 3745-21-22(J)(3).
- (5) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

- (1) Compliance with the emission limitation(s) in Section b) of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation:
VOC emissions from shall not exceed 12.27 tons per rolling 12-month period.

Applicable Compliance Method:

Compliance shall be determined by summing emissions for the rolling 12-month period of ink, fountain solution, inline solution, and cleanup material.

Ink + Fountain Solution + Inline + Clean up = total tons VOC/rolling 12-months

The ink emissions per rolling 12-months shall be determined by multiplying the annual amount of ink consumed per rolling 12-months in pounds by the weight percent VOC of the ink multiplied by 5% (amount of material not absorbed by substrate) times 1 ton/2000 lb.

$(\text{lb/rolling 12-months})(\% \text{ VOC})(100\% - \text{Ink Retention Factor}) * 1 \text{ ton}/2000 \text{ lb} = \text{tons VOC/rolling 12-months}$

The fountain solution emissions per rolling 12-months shall be determined by multiplying the organic compound content (lb/gallon) by the amount of material consumed per rolling 12-months (gallons/rolling 12-months (not to exceed 500 gallons)) times 1 ton/2000 lb.

$(\text{lb/rolling 12-months})(\% \text{ VOC}) * 1 \text{ ton}/2000 \text{ lb} = \text{tons VOC/rolling 12-months}$

The inline solution emissions per rolling 12-months shall be determined by multiplying the organic compound content (lb/gallon) by the amount of material consumed per rolling 12-months (gallons/rolling 12-months (not to exceed 6000 gallons)) times 1 ton/2000 lb.

$(\text{lb VOC/gal}) * (\text{gallons/rolling 12-months}) * 1 \text{ ton}/2000 \text{ lb} = \text{tons VOC/rolling 12-months}$

The cleanup material emissions per rolling 12-months shall be determined by multiplying the amount of cleanup consumed (gallons/rolling 12-months (not to exceed 500 gallons)) in pounds by the weight percent VOC of the ink multiplied by 50% (amount of material not absorbed by substrate) times 1 ton/2000 lb.

$(\text{lb cleanup/rolling 12-months})(\% \text{ VOC})(100\% - \text{RF cleanup}) * 1 \text{ ton}/2000 \text{ lb} = \text{tons VOC/rolling 12-months}$

b. Emission Limitation:

If the fountain solution contains only alcohol substitutes the as-applied VOC content must be maintained below 5.0 percent, by weight.

Applicable Compliance Method:

The as-applied VOC content shall be determined by one of the methods outlined in OAC 3745-21-22(F)(2).

c. Emission Limitation:

If the fountain solution contains alcohol:

- i. Maintain the as-applied VOC content below 5.0 percent, by weight; or

- ii. Maintain the as-applied VOC content at or below 8.5 percent by weight, and refrigerate the fountain solution to 60 degrees Fahrenheit or less.

Applicable Compliance Method:

The as-applied VOC content shall be determined by one of the methods outlined in OAC 3745-21-22(F)(2) and 3745-21-22(F)(3).

- d. Emission Limitation:

The VOC content of each cleaning material shall be maintained at or below 70 percent by weight, as applied.

Applicable Compliance Method:

The VOC content shall be determined by one of the methods outlined in OAC 3745-21-22(F)(4).

- e. Emission Limitation:

The VOC composite partial vapor pressure of each cleaning material shall be maintained at or below 10 mmHg at 68 degrees Fahrenheit, as applied.

Applicable Compliance Method:

The VOC composite partial vapor pressure shall be determined by one of the methods outlined in OAC rule 3745-21-22(F)(5).

g) Miscellaneous Requirements

- (1) For purposes of determining VOC emissions, the following shall be used:

- a. 95 percent VOC retention factor shall be used for sheet-fed inks printed on absorptive substrates, meaning 5% of the VOC in the ink is emitted during the printing process;
- b. 50 percent VOC retention factor shall be used for cleaning solution VOC in shop towels for cleaning solutions with a VOC composite vapor pressure of no more than 10 mm Hg at 20 Celsius (68 degrees Fahrenheit) if the contaminated shop towels are kept in closed containers, meaning 50% of the VOC used on the shop towels is emitted during the cleaning process.

- (2) Modeling to demonstrate compliance with, the Toxic Air Contaminant Statute, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit-to-install (PTI) 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 PTI.