



Environmental Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

1/20/2011

CHIP FRIESNER
Consolidated Graphics dba The Cyril-Scott Company
3950 LANCASTER-NEW LEXINGTON RD
PO BOX 310
LANCASTER, OH 43130

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0123010198
Permit Number: P0107409
Permit Type: Initial Installation
County: Fairfield

Certified Mail

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
No	SYNTHETIC MINOR TO AVOID TITLE V
No	FEDERALLY ENFORCABLE PTIO (FEPTIO)

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 Josh Mandel," 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 Ohio EPA DAPC, Central District Office at (614)728-3778 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: Ohio EPA-CDO



FINAL

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

Consolidated Graphics dba The Cyril-Scott Company

Facility ID:	0123010198
Permit Number:	P0107409
Permit Type:	Initial Installation
Issued:	1/20/2011
Effective:	1/20/2011
Expiration:	1/7/2021



Division of Air Pollution Control
Permit-to-Install and Operate
for
Consolidated Graphics dba The Cyril-Scott Company

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Authorization

Facility ID: 0123010198

Application Number(s): A0041021

Permit Number: P0107409

Permit Description: This permit is a PTIO for the initial installation of a new heatset web press with a single natural gas-fired dryer controlled by an existing catalytic oxidizer.

Permit Type: Initial Installation

Permit Fee: \$200.00

Issue Date: 1/20/2011

Effective Date: 1/20/2011

Expiration Date: 1/7/2021

Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Consolidated Graphics dba The Cyril-Scott Company
3950 LANCASTER-NEW LEXINGTON RD
Lancaster, OH 43130

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

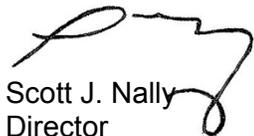
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049
(614)728-3778

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



Scott J. Nally
Director



Authorization (continued)

Permit Number: P0107409

Permit Description: This permit is a PTIO for the initial installation of a new heatset web press with a single natural gas-fired dryer controlled by an existing catalytic oxidizer.

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

Emissions Unit ID:	K028
Company Equipment ID:	Press #134
Superseded Permit Number:	
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 Ohio EPA DAPC, Central District Office 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 under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or

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).

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. K028, Press #134

Operations, Property and/or Equipment Description:

Heatset web press with a single natural gas-fired dryer (3.4 million Btu per hour maximum heat input) controlled by an existing catalytic oxidizer (4000 scfm, ID No. S9)

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)(8).

(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.

Table with 2 columns: Applicable Rules/Requirements and Applicable Emissions Limitations/Control Measures. Row a: OAC rule 3745-31-05(A)(3); as effective 11/30/01. Row b: OAC rule 3745-31-05(A)(3)(a)(ii), as



Table with 2 columns: Applicable Rules/Requirements, Applicable Emissions Limitations/Control Measures. Rows include OAC rule 3745-17-07(A), OAC rule 3745-17-11(B), and OAC rule 3745-31-05(F).

(2) Additional Terms and Conditions

- a. VOC emissions from this emissions unit shall be vented to a catalytic oxidizer that shall meet the operational, monitoring, and record keeping requirements of this permit, when the emissions unit is in operation.
b. The annual emission limitations are based on the use of the catalytic oxidizer, the VOC coating contents, and the maximum hourly material usage rates as contained in the permittee's application (A0041021).
c. 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.
d. The following rule paragraph will apply 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 (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE, SO2, NOx, VOC, and CO emissions from this air

contaminant source since the controlled potential to emit for each of these pollutants is less than 10 tons per year.

- e. As stated in Ohio EPA Engineering Guide #61, a facility is presumed to have an inherent physical limitation if the facility's actual emissions of any regulated pollutant are below twenty percent of the Title V major source threshold and can be substantiated by the permittee maintaining actual emission records showing that emissions are less than twenty percent of the major source threshold. The permittee has notified Ohio EPA of its status as a non-Title V facility in accordance with the Engineering Guide. Therefore, the permittee is considered to have an inherent physical limitation limiting emissions below the Title V major source threshold until such time that facility-wide actual emissions for any regulated pollutant exceed 20 percent of the respective pollutant threshold.

c) Operational Restrictions

- (1) The catalytic oxidizer shall be operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals. The conversion efficiency of the catalyst, as determined in an annual catalyst activity test, shall be sufficient to meet the destruction efficiency and control efficiency requirements of this permit at a test temperature that is equal to that temperature at which the inlet to the catalyst bed is set. Solvent loading during the catalyst activity test shall be consistent with the test laboratory's normal testing protocol.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information for emissions unit K028:
 - a. the company identification for each individual material (ink, roller and blanket wash, glue, and clean-up material) employed;
 - b. the number of gallons of each individual material (ink, roller and blanket wash, glue, and clean-up material) employed;
 - c. the organic compound content of each individual material (ink, roller and blanket wash, glue, and clean-up material), in pounds per gallon; and
 - d. the total VOC emission rate for all materials (ink, roller and blanket wash, glue, and clean-up material), in pounds per month.
- (2) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;

- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible emissions incident; and
- e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

- (3) The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned frequencies for performing the visible emissions checks if operating experience indicates that less frequent visible emissions checks would be sufficient to ensure compliance with the above-mentioned applicable requirements.
- (4) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable temperature of the exhaust gases immediately before the catalyst bed, during any period of time when the emissions unit controlled by the catalytic oxidizer is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance. The acceptable temperature difference across the catalyst bed (when the emissions unit is in operation), shall not be less than 80 percent of the average temperature difference measured during the most recent performance test that demonstrated the emissions unit was in compliance.
- (5) The permittee shall properly install, operate, and maintain continuous temperature monitors and recorder(s) that measure and record(s), on a continuous basis, the temperature immediately upstream and downstream of the incinerator's catalyst bed when the emissions unit is in operation, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee. The acceptable temperature settings shall be based upon the manufacturer's specifications until such time as any required performance testing is conducted and the appropriate range for each parameter is established to demonstrate compliance. The permittee may use a temperature chart recorder or equivalent recording device as the log that documents the temperature differential across the catalyst bed. These records shall be maintained at the facility for a period of no less than 3 years.

- (6) The permittee shall perform a preventative maintenance inspection of the catalytic oxidizer on an annual basis to evaluate the performance of the catalyst bed. Each inspection shall consist of internal and visual inspections in accordance with the manufacturer's recommendations, and shall include a physical inspection of the unit and all of the associated equipment, including but not limited to burners, controls, dampers, valves, and monitoring and recording equipment. Repair and replacement of equipment and the catalyst shall be performed as determined by the inspection. During each annual inspection a sample of the catalyst material shall be collected from the catalyst bed and used to perform a catalyst activity test. The permittee shall maintain a record of the results of each annual inspection and the results of each annual catalyst activity test.

The permittee shall also perform weekly inspections of the external integrity of the catalytic oxidizer. Records shall be maintained of the inspections and the date(s) of catalyst replacement, and if only partial, the amount or percent of the total catalyst replaced.

- (7) Whenever the monitored average temperature of the exhaust gases immediately before the catalyst bed and/or the average temperature difference across the catalyst bed deviates from the range or limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range(s)/limit(s) specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- a. a description of the corrective action;
- b. the date corrective action was completed;
- c. the date and time the deviation ended;
- d. the total period of time (in minutes) during which there was a deviation;
- e. the temperature of the exhaust gases immediately before the catalyst and the average temperature difference across the catalyst bed immediately after the corrective action was implemented; and
- f. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The temperature ranges are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted temperature range(s) based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate(s) of the controlled pollutant(s). In addition, approved revisions to the temperature range(s) will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

- (8) 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) 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.
- (2) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the catalytic oxidizer during the 12-month reporting period for this/these emissions unit(s):
- each period of time (start time and date, and end time and date) when the average temperature of the exhaust gases immediately before the catalyst bed and/or the average temperature difference across the catalyst bed was outside of the ranges specified by the manufacturer and/or outside of the acceptable ranges following any required compliance demonstration;
 - any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the catalytic oxidizer;
 - each incident of deviation described in "a" or "b" (above) where a prompt investigation was not conducted;
 - each incident of deviation described in "a" or "b" where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the temperature of

- the exhaust gases immediately before the catalyst bed or the average temperature difference across the catalyst bed into compliance with the acceptable range(s), was determined to be necessary and was not taken;
- e. each incident of deviation described in “a” or “b” where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit; and
 - f. the results of any catalyst activity test(s) along with a summary of the results of the annual inspection of the internal integrity of the catalytic oxidizer.
- (3) The permittee shall identify in the annual permit evaluation report whether any regulated pollutant exceeded twenty percent of its respective Title V major source threshold for the calendar year specified in the report. If any exceedence has occurred, the report shall also include the actual emissions (in tons) of the pollutant(s) that exceeded the threshold(s).
- (4) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in specific condition d)(2) above:
- a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
 - b. any corrective actions taken to minimize or eliminate the visible particulate emissions.
- f) Testing Requirements
- (1) 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.
- (2) Emissions Limitation
- VOC emissions shall not exceed 0.95 lb/hr and 4.16 tpy.
- Applicable Compliance Method
- Compliance shall be based upon meeting the control requirements required in Sections c)(1), d)(4), (5), (6) and (7) above.
- Compliance with the VOC emissions limitation shall be determined through emissions testing performed as required by Section f)(3) below.
- (3) Emissions Limitation
- VOC emissions from the emissions unit shall be controlled by a catalytic oxidizer with a minimum control efficiency of 95%.

Applicable Compliance Method

The permittee shall conduct, or have conducted, emissions testing for this emissions unit in accordance with the following requirements:

- a. The emission testing shall be conducted within 60 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than 180 days after initial startup of the emissions unit.
- b. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency limitation for VOCs.
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): EPA Methods 1-4, and 18, 25, 25A, or 320.

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 or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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).
- f. Personnel from the appropriate Ohio EPA District Office or local air agency 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.
- g. 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 appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency.

(4) Emissions Limitation

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

Applicable Compliance Method

Compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures in OAC Rule 3745-17-03(B)(1).

(5) Emissions Limitation

Particulate emissions shall not exceed 0.03 lb/hr and 0.11 tpy.

Applicable Compliance Method

The hourly emission limitation was calculated by using the heat input capacity of 3.4 mmBtu per hour and multiplying 7.6 lbs of total PM/million standard cubic feet [emissions factor per AP-42, "Compilation of Air Pollutant Emission Factors," 5th Edition, Section 1.4, Table 1.4-2 for natural gas combustion], and dividing by the heat content of natural gas (1020 mmBtu/million standard cubic feet).

The annual limitation was established by multiplying the hourly emission limitation by 8760 hours of operation per year, and then dividing by 2000 pounds per ton.

If required, compliance with the particulate emissions limitation shall be determined through emissions testing performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 5.

(6) Emissions Limitation

SO₂ emissions shall not exceed 0.002 lb/hr and 0.01 tpy.

Applicable Compliance Method

The hourly emission limitation was calculated by using the heat input capacity of 3.4 mmBtu per hour and multiplying by 0.6 lbs SO₂/million standard cubic feet [emissions factor per AP-42, "Compilation of Air Pollutant Emission Factors," 5th Edition, Section 1.4, Table 1.4-2 for natural gas combustion], and dividing by the heat content of natural gas (1020 mmBtu/million standard cubic feet).

The annual limitation was established by multiplying the hourly emission limitation by 8760 hours of operation per year, and then dividing by 2000 pounds per ton.

If required, compliance with the SO₂ emissions limitation shall be determined through emissions testing performed in accordance with 40 CFR Part 60, Appendix A, Method 6.

(7) Emissions Limitation

NO_x emissions shall not exceed 0.33 lb/hr and 1.46 tpy.

Applicable Compliance Method

The hourly emission limitation was calculated by using the heat input capacity of 3.4 mmBtu per hour and multiplying by 100 lb NO_x/million standard cubic feet [emissions factor per AP-42, "Compilation of Air Pollutant Emission Factors," 5th Edition, Section

1.4, Table 1.4-1 for natural gas combustion], and dividing by the heat content of natural gas (1020 mmBtu/million standard cubic feet).

The annual limitation was established by multiplying the hourly emission limitation by 8760 hours of operation per year, and then dividing by 2000 pounds per ton.

If required, compliance with the NO_x emissions limitation shall be determined through emissions testing performed in accordance with 40 CFR Part 60, Appendix A, Method 7.

(8) Emissions Limitation

CO emissions shall not exceed 0.28 lb/hr and 1.23 tpy.

The hourly emission limitation was calculated by using the heat input capacity of 3.4 mmBtu per hour and multiplying by 84 lbs CO/ million standard cubic feet [emissions factor per AP-42, "Compilation of Air Pollutant Emission Factors," 5th Edition, Section 1.4, Table 1.4-2 for natural gas combustion], and dividing by the heat content of natural gas (1020 mmBtu/million standard cubic feet).

The annual limitation was established by multiplying the hourly emission limitation by 8760 hours of operation per year, and then dividing by 2000 pounds per ton.

Applicable Compliance Method

If required, compliance with the CO emissions limitation shall be determined through emissions testing performed in accordance with 40 CFR Part 60, Appendix A, Method 10.

g) Miscellaneous Requirements

(1) None.