



Environmental Protection Agency

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

1/27/2011

David Zurieck  
Champion Graphics Corporation  
3901 Virginia Avenue  
Cincinnati, OH 45227

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE  
Facility ID: 1431070383  
Permit Number: P0107145  
Permit Type: Renewal  
County: Hamilton

Certified Mail

No	TOXIC REVIEW
No	PSD
Yes	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	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](http://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 Hamilton County Dept. of Environmental Services at (513)946-7777 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](http://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: HCDOES





## Response to Comments

Response to comments for: Permit-To-Install and Operate

Facility ID:	1431070383
Facility Name:	Champion Graphics Corporation
Facility Description:	Screen Printing Company
Facility Address:	3901 Virginia Avenue Cincinnati, OH 45227 Hamilton County
Permit #:	P0107145, Renewal
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the The Cincinnati Enquirer on 12/09/2010. The comment period ended on 01/08/2011.	
Hearing date (if held)	N/A
Hearing Public Notice Date (if different from draft public notice)	N/A

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

1. Topic: **No comments received.**





**FINAL**

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

Facility ID:	1431070383
Permit Number:	P0107145
Permit Type:	Renewal
Issued:	1/27/2011
Effective:	1/27/2011
Expiration:	5/14/2014





Division of Air Pollution Control
Permit-to-Install and Operate
for
Champion Graphics Corporation

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## Authorization

Facility ID: 1431070383  
Application Number(s): A0040644  
Permit Number: P0107145  
Permit Description: Permit renewal for two silk screen operations R009 and R010 initially permitted under PTI 14-02745 issued 10/7/92.  
Permit Type: Renewal  
Permit Fee: \$0.00  
Issue Date: 1/27/2011  
Effective Date: 1/27/2011  
Expiration Date: 5/14/2014  
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Champion Graphics Corporation  
3901 Virginia Avenue  
Cincinnati, OH 45227

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

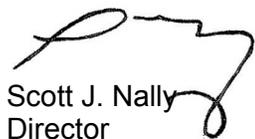
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Hamilton County Dept. of Environmental Services  
250 William Howard Taft Pkwy.  
Cincinnati, OH 45219-2660  
(513)946-7777

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: P0107145  
Permit Description: Permit renewal for two silk screen operations R009 and R010 initially permitted under PTI 14-02745 issued 10/7/92.

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

<b>Emissions Unit ID:</b>	<b>R009</b>
Company Equipment ID:	Press #5
Superseded Permit Number:	14-2745
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>R010</b>
Company Equipment ID:	Press #10
Superseded Permit Number:	14-2745
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 Hamilton County Dept. 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 submitting<sup>1</sup> 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?**

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<sup>1</sup> 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).

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 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) 2., 3., 4., and 5.
2. The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units R001 through R006, R008 through R012, other de minimis air contaminant sources, as defined in OAC rule 3745-15-05, and other air contaminant sources exempt from the requirement to obtain a permit-to-install pursuant to OAC rule 3745-31-03 installed subsequent to the issuance of this permit, combined, shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.
3. The permittee shall collect and record the following information each month for all materials containing any hazardous air pollutant (HAP)<sup>1</sup> that are applied in the emissions units or air contaminant sources listed in 2 above:
  - a) the name and identification number/code of each liquid organic material utilized containing any HAP;
  - b) the individual Hazardous Air Pollutant (HAP) content for each HAP of each liquid organic material utilized, in pounds of individual HAP per pound of liquid organic material utilized;
  - c) the total combined HAP content of each liquid organic material in pounds of combined HAPs per pound of liquid organic material utilized, (sum all the individual HAP contents from (b));
  - d) the number of pounds of liquid organic material utilized ;
  - e) the name and identification of each cleanup material employed (if applicable);
  - f) the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per pound of cleanup material, utilized;
  - g) the total combined HAP content of each cleanup material, in pounds of combined HAPs per pound of cleanup material utilized(sum all the individual HAP contents from (f));
  - h) the number of pounds of each cleanup material utilized;
  - i) the total individual HAP emissions for each HAP from all liquid organic material utilized and cleanup materials utilized, in pounds or tons per month (for each HAP, the sum of (b) times (d) for each liquid organic material utilized and the sum of (f) times (h) for each cleanup material);



- j) the total combined HAP emissions from all liquid organic material utilized and cleanup materials utilized, in pounds or tons per month [(the sum of (c) times (d) for each liquid organic material utilized plus the sum of (g) times (h) for each cleanup material)];
- k) the rolling, 12-month summation of the controlled individual HAP emissions from all liquid organic material utilized and cleanup materials utilized, in tons per year [(sum of (k) for each HAP for the previous 12 months)]; and
- l) the rolling, 12-month summation of the controlled combined HAP emissions from all coatings and cleanup materials employed, in tons per year [(sum of (l) for the previous 12 months)].

<sup>1</sup>A listing of the HAPs can be found in Section 112(b) of the Clean Air Act, or can be obtained by contacting your Ohio EPA District Office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings and cleanup materials.

4. The permittee shall submit quarterly deviation (excursion) reports for emissions units R001 through R006, R008 through R012, other de minimis air contaminant sources, as defined in OAC rule 3745-15-05, and other air contaminant sources exempt from the requirement to obtain a permit-to-install pursuant to OAC rule 3745-31-03 installed subsequent to the issuance of this permit that identify:

- a) all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

See emission limitations in 2. above;

- b) the probable cause of each deviation (excursion);
- c) any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d) the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

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).

5. Compliance with the emission limitations in 2. of these terms and conditions shall be determined in accordance with the following method(s) identified below:

- a) Emission Limitations:

Emissions units R001 through R006, R008 through R012, other de minimis air contaminant sources, as defined in OAC rule 3745-15-05, and other air contaminant sources exempt from the requirement to obtain a permit-to-install pursuant to OAC rule 3745-31-03 installed subsequent to the issuance of this permit, combined, shall not exceed 9.9 TPY for any single

HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the HAP emission limitations shall be demonstrated by the methods outlined in the recordkeeping requirements in 3. above.

## **C. Emissions Unit Terms and Conditions**



1. R009, Press #5

Operations, Property and/or Equipment Description:

Silk screen printing operation

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. None.

(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. See b)(1)b., b)(2)a. thru c., c)(2), d)(1)a. thru e., d)(2), and e(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.	OAC rule 3745-31-05(A)(3)	Organic Compounds (OC) emissions shall not exceed 8 lbs per hour and 40 lbs/day.  See b)(2)a. through b)(2)c. below.  The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D)(1)(b), except for Section B.2.
b.	OAC rule 3745-31-05(D)(1)(b), to avoid non-attainment new source review and Title V.	OC emissions shall not exceed 6.45 tons per year (TPY), including OC emissions from cleanup material, based upon a rolling, 12-month summation.
c.	OAC rule 3745-31-05(D)(1)(b), to avoid Title V.	See Section B.2.
d.	OAC rule 3745-21-07(G)(2)	The requirements of OAC rule 3745-21-07(G) are equally as stringent as the requirements of OAC rule 3745-31-05(A)(3).



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See b)(2)d.

(2) Additional Terms and Conditions

- a. The monthly usage of inks (without add-in thinners), thinners, and cleanup materials employed in this emissions unit shall not exceed 83.3 gallons, 28.3 gallons and 41.7 gallons, respectively.
- b. The maximum OC content (as applied) of the inks (including thinners) shall not exceed 6.82 pounds of OC per gallon of ink.
- c. The maximum OC content of the cleanup material shall not exceed 7.51 pounds of OC per gallon of cleanup material.
- d. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The following terms and conditions shall become void after U.S. EPA approves the rule revision:

b)(1)d.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information for each day for this emissions unit:
  - a. the company identification for each ink, thinner, and cleanup material employed;
  - b. the number of gallons of each ink and cleanup material employed;
  - c. the number of gallons of each ink (without add-in thinner) and thinner;
  - d. the OC content of each ink, as employed, and cleanup material, in pounds of OC per gallon;
  - e. the total OC emission rate for all inks and cleanup materials, in pounds of OC per day [summation of (b. x d. + b. x d.) for each ink and cleanup material];
  - f. the total number of hours the emissions unit was in operation; and

- g. the average hourly OC emission rate for all inks and cleanup materials (e./f.), in pounds per hour.

[Note: The ink information, except as noted, must be for the inks as employed, including any thinning solvents added at the emissions unit.]

- (2) The permittee shall collect and record the following information each month for this emissions unit:
- a. the total OC emission rate for all inks and cleanup materials, in tons per month;
  - b. the total OC emission rate for this emissions unit for all inks and cleanup materials, as a rolling, 12-month summation; and
  - c. the total usage rates, in gallons, of inks (without add-in thinners), thinners, and cleanup materials.

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 submit quarterly deviation (excursion) reports which include the following information:
- a. an identification of each month during which the rolling 12-month summation for OC emissions for this emissions unit exceeded the limit stated above, and the actual OC emission rate for each such rolling, 12-month summation; and
  - b. an identification of each month during which the monthly ink, thinner, and/or cleanup usage rates exceed any of the usage limits stated above, and the actual usage(s) for each such month.

f) Testing Requirements

- (1) Compliance with the 8 lbs per hour and 40 lbs/day of OC emission limitations shall be based upon the record keeping requirements contained in d)(1) of this permit.
- (2) Compliance with the 6.45 TPY of OC limitation based upon a rolling, 12 month summation shall be determined by the record keeping requirements in d)(2) of this permit.
- (3) Compliance with the usage and OC content limits specified in b)(2) shall be determined by the record keeping requirements in d)(2) and d)(1), respectively, of this permit.
- (4) Formulation data or USEPA Method 24 or 24A shall be used to determine the OC content for the inks and cleanup materials employed in this emissions unit.

- g) Miscellaneous Requirements
  - (1) None.



2. R010, Press #10

Operations, Property and/or Equipment Description:

silk screen printing operation

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. None.

(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. See b)(1)b., b)(2)a. thru b)(2)c., d(1)a. thru d., d(2), and e)(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.	OAC rule 3745-31-05(A)(3)	Emissions of organic compounds (OC) shall not exceed 8 lbs per hour and 40 lbs/day.  See b)(2)a. and b)(2)c. below.  The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D)(1)(b), except for Section B.2.
b.	OAC rule 3745-31-05(D)(1)(b), to avoid non-attainment new source review and Title V.	OC emissions shall not exceed 1.53 TPY, including OC emissions from cleanup material, based upon a rolling, 12-month summation.
c.	OAC rule 3745-31-05(D)(1)(b), to avoid Title V.	See Section B.2.
d.	OAC rule 3745-21-07(G)(2)	The requirements of OAC rule 3745-21-07(G) are equally as stringent as the requirements of OAC rule 3745-31-05(A)(3).



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See b)(2)d.

(2) Additional Terms and Conditions

- a. This emissions unit shall use only ultraviolet (UV) curable inks in this emissions unit.
- b. The maximum monthly usage of cleanup materials in this emissions unit shall not exceed 33.3 gallons.
- c. The maximum OC content of the cleanup material shall not exceed 7.51 pounds of OC per gallon of cleanup material.
- d. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The following terms and conditions shall become void after U.S. EPA approves the rule revision:

b)(1)d.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information for each day for this emissions unit:

- a. the company identification for each ink and cleanup material employed;
- b. the number of gallons of each ink and cleanup material employed;
- c. the OC content of each ink and cleanup material, in pounds per gallon;
- d. the total OC emission rate for all inks and cleanup materials, in pounds per day (summation of b. x c. for each ink and cleanup material);
- e. the total number of hours the emissions unit was in operation; and
- f. the average hourly OC emission rate for all inks and cleanup materials (d./e.), in pounds per hour.

[Note: The ink information must be for inks as employed, including any thinning solvents added at the emissions unit.]

- (2) The permittee shall collect and record the following information each month for this emissions unit.
    - a. the total OC emission rate for all coatings and cleanup materials, in tons per month; and.
    - b. the total OC emission rate from this emissions unit for all coatings and cleanup materials, as a rolling, 12-month summation.
  - (3) The permittee shall maintain records of any day when ink other than UV curable ink was used and the quantity of such ink used.
- 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 submit quarterly deviation (excursion) reports which include the following information:
    - a. an identification of each month during which the 12-month summation for OC emissions for this emissions unit exceeded the limit stated above, and the actual OC emission rate for each such rolling, 12-month summation;
    - b. an identification of each month during which the monthly cleanup usage rate exceeded the usage limit stated above, and the actual usage(s) for each such month; and
    - c. an identification of each day during which any ink other than UV curable ink was used in this emissions unit and the amount of such ink.
- f) Testing Requirements
- (1) Compliance with the 8 lbs per hour and 40 lbs of OC/day emission limitations shall be determined by the record keeping requirements contained in d)(1) of this permit.
  - (2) Compliance with the 1.53 TPY of OC emission limitation shall be determined by the record keeping requirements contained in d)(2) of this permit.
  - (3) Compliance with the cleanup material usage and OC content limitations specified in b)(2)b. thru b(2)c. shall be determined by the record keeping requirements in d)(1) of this permit.
  - (4) Formulation data or USEPA Method 24 or 24A shall be used to determine the OC content for the inks and cleanup materials employed in this emissions unit.



- (5) Compliance with the requirements to use only UV curable inks in this emissions unit shall be determined by the record keeping requirements in d)(3) of this permit.
- g) Miscellaneous Requirements
  - (1) None.