



State of Ohio Environmental Protection Agency

Street Address:

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Columbus, OH 43215

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Mailing Address:

Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

RE: FINAL PERMIT TO INSTALL

FAIRFIELD COUNTY

Application No: 01-12116

Fac ID: 0123010198

DATE: 4/17/2007

The Cyril-Scott Company
Chip Friesner
PO Box 310
Lancaster, OH 43130

CERTIFIED MAIL

| | |
|--|------------------------------|
| | TOXIC REVIEW |
| | PSD |
| | SYNTHETIC MINOR |
| | CEMS |
| | MACT |
| | NSPS |
| | NESHAPS |
| | NETTING |
| | MAJOR NON-ATTAINMENT |
| | MODELING SUBMITTED |
| | GASOLINE DISPENSING FACILITY |

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final 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 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

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA

CDO



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install
Terms and Conditions

Issue Date: 4/17/2007
Effective Date: 4/17/2007

FINAL PERMIT TO INSTALL 01-12116

Application Number: 01-12116
Facility ID: 0123010198
Permit Fee: **\$200**
Name of Facility: The Cyril-Scott Company
Person to Contact: Chip Friesner
Address: PO Box 310
Lancaster, OH 43130

Location of proposed air contaminant source(s) [emissions unit(s)]:
3950 Lancaster New Lexington Rd
Lancaster, Ohio

Description of proposed emissions unit(s):
8 Hantscho Mark VIA printing units, 2 TEC hot air dryers, 1 AEG project air 4000 catalytic incinerator.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Kralak

Chris Korleski
Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (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.)

3. Records Retention Requirements

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

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air

contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

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

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental

Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

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

10. Public Disclosure

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

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. Best Available Technology

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

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

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only) TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

| <u>Pollutant</u> | <u>Tons Per Year</u> |
|------------------|----------------------|
| VOC | 39.3 |
| NOx | 2.7 |
| SO2 | 0.02 |
| CO | 2.3 |
| PM | 0.2 |

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K026) - No. 148/149 Hantscho 4 - heatset offset web printing press

| Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|--|
| OAC rule 3745-31-05(A)(3) | <p>Volatile Organic Compound (VOC) emissions shall not exceed 9.82 pounds per hour.</p> <p>See A.2.a. and A.2.b. below</p> |
| OAC rule 3745-31-05(C) (synthetic minor to avoid non-attainment new source review [NSR]) | VOC emissions from coating and cleanup operations shall not exceed 39.3 tons per rolling, 12-month summation. |
| ORC 3704.03(T) | See A.2.c. below |
| OAC rule 3745-17-07(A) | Visible particulate emissions from any stack shall not exceed twenty per cent opacity, as a six-minute average. |
| OAC rule 3745-17-11(B) | Particulate emissions shall not exceed 1.42 pounds per hour. |
| OAC rule 3745-18-06(E) | See A.2.d below. |
| OAC rule 3745-21-07(G)(2) | <p>VOC emissions shall not exceed 8 pounds per hour or 40 pounds per day, unless said emissions are reduced by at least 85%.</p> <p>Compliance with this emission limitation includes compliance with OAC rule 3745-21-07(G)(3).</p> |

2. Additional Terms and Conditions

- 2.a The permittee shall control VOC emissions from this air contaminant source through the use of a catalytic incinerator with a minimum control efficiency of 95%.

- 2.b** The hourly VOC emission limitation represent the potential to emit for this emissions unit. Therefore no monitoring, record keeping, or reporting requirements are necessary to ensure compliance with this emission limitation.
- 2.c** The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the NO_x, CO, SO₂ and PM emissions from this air contaminant source since the uncontrolled potential to emit for NO_x, CO, SO₂ and PM is less than ten tons per year.
- 2.d** This emissions unit is exempt from the requirements of OAC rule 3745-18-06 (SO₂ limitations) pursuant to OAC rule 3745-18-06(C).

B. Operational Restrictions

- 1. The permittee shall control VOC emissions from this air contaminant source through the use of a catalytic oxidizer at all times the air contaminant source is in operation.
- 2. The permittee shall maintain the viability of the catalyst system by testing and replacing the catalyst as required in this permit. The longevity of the catalyst shall be determined through regulated sampling and testing of the material. The frequency of sampling and catalyst replacement shall be increased with failing or borderline test results; or the schedule may be adjusted or extended with the demonstration of continuous compliant test results.
- 3. The maximum annual ink usage, in gallons, for this emissions unit shall not exceed 408,600 gallons, based upon a rolling, 12-month summation of the ink usage figures.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the ink usage levels, in gallons, specified in the following table:

| <u>Month(s)</u> | <u>Maximum Allowable Cumulative Ink Usage (in gallons)</u> |
|-----------------|--|
| 1 | 100,000 |
| 1-2 | 200,000 |
| 1-3 | 300,000 |
| 1-4 | 400,000 |
| 1-5 | 408,600 |
| 1-6 | 408,600 |
| 1-7 | 408,600 |
| 1-8 | 408,600 |
| 1-9 | 408,600 |
| 1-10 | 408,600 |

| | |
|------|---------|
| 1-11 | 408,600 |
| 1-12 | 408,600 |

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual ink usage limitation, in gallons, shall be based upon a rolling, 12-month summation of the ink usage figures.

3. The maximum annual roller and blanket wash usage, in gallons for this emissions unit shall not exceed 8,000 gallons, based upon a rolling, 12-month summation of the roller and blanket wash usage figures.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the roller and blanket wash usage levels, in gallons, specified in the following table:

| <u>Month(s)</u> | <u>Maximum Allowable Cumulative roller and blanket wash Usage (in gallons)</u> |
|-----------------|--|
| 1 | 1,000 |
| 1-2 | 2,000 |
| 1-3 | 3,000 |
| 1-4 | 4,000 |
| 1-5 | 5,000 |
| 1-6 | 6,000 |
| 1-7 | 7,000 |
| 1-8 | 8,000 |
| 1-9 | 8,000 |
| 1-10 | 8,000 |
| 1-11 | 8,000 |
| 1-12 | 8,000 |

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual roller and blanket wash usage limitation, in gallons, shall be based upon a rolling, 12-month summation of the roller and blanket wash usage figures.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records of the following information:
 - a. The company identification for each ink and roller and blanket wash used; and
 - b. the ink usage and roller and blanket wash, in gallons; and
 - c. the ink density, in pounds per gallon, of the inks used; and

- d. the roller and blanket wash density, in pounds per gallon, of the roller and blanket wash used; and
- e. the VOC content for each ink and roller and blanket wash used (in pounds of VOC per gallon); and
- f. the uncontrolled fugitive emissions of VOC from the roller and blanket wash, in pounds, assuming that 50% of the roller and blanket wash is emitted as fugitive VOCs; and
- g. the controlled VOC emissions from the roller and blanket wash, in pounds, assuming that 50% of the roller and blanket wash is captured and vented to the catalytic oxidizer; and
- h. the controlled VOC emissions from ink, in pounds, assuming 80% of the ink VOC is vented to the catalytic oxidizer; and
- i. the hours of operation of the press; and
- j. the hours of operation of the oven and catalytic oxidizer; and
- k. the controlled VOC emissions, in pounds of VOC per day.

The controlled VOC emissions shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.

If emission testing has not yet taken place, the control efficiency shall be based upon the manufacturer's guaranteed control efficiency for the control device until such time as any required emission testing is conducted.

The VOC emissions shall be calculated using the formulae outlined in the permittee's PTI application 01-12116 and DAPC Guidance outlined in Engineering Guide #56

- 2. Beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the ink and roller and blanket wash usage figures, in gallons; and
- 3. Also, during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative ink and roller and blanket wash usage for each calendar month.
- 4. The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the average temperature of the exhaust gases immediately before

the catalyst bed and the temperature difference across the catalyst bed, for any 3-hour block of time 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). The permittee shall record the average temperature of the exhaust gases immediately before the catalyst bed and the temperature difference across the catalyst bed on continuous basis.

Whenever the monitored value for the average temperature of the exhaust gases immediately before the catalyst bed or the temperature difference across the catalyst bed deviates from the ranges specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and 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 temperature ranges specified below, 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 description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the temperature measurements immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

Until compliance testing has been conducted, as required in this permit, the average temperature of the exhaust gases immediately before the catalyst bed and the temperature difference across the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall be maintained at the average temperature recommended by the manufacturer of the incinerator for the catalyst used, with any modifications deemed necessary by the permittee. Following compliance testing, the average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature maintained during the most recent emissions test that demonstrated the emissions unit to be in compliance; and the average temperature difference across the catalyst bed, for any 3-hour block of time the emissions unit is in operation, shall not be less than 80 percent of the average temperature difference maintained during the most recent emissions test that demonstrated the emissions unit to be in compliance.

These ranges are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA Central District Office or local air agency. The permittee may request revisions to the ranges based upon information obtained during future VOC emission tests that demonstrate compliance with the allowable VOC emission rate for this emissions unit. In addition, approved revisions to the ranges 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.

5. The permittee shall develop and maintain an inspection, maintenance, and monitoring plan for the catalytic oxidizer. The plan shall include a sampling and replacement schedule for the catalyst. The permittee shall sample, test, and maintain records of the testing results of the viability and condition of the catalyst. Samples of the catalyst shall be collected either as a representative sample, taken from different layers of the bed/monolith; or may be taken as a single sample from the leading edge of the bed, where it is first exposed to the process gas. The permittee shall initially use the operational history of similar systems and/or vendor recommendations to determine the frequency of sampling and testing for the performance and condition of the catalyst. The frequency of sampling may be adjusted or reduced as compliant test data and the incinerator's site-specific catalyst replacement schedule is developed. The frequency of sampling shall be increased with any testing results showing a VOC destruction efficiency equal to or less than that required to maintain the control efficiency requirements contained in this permit. The permittee shall maintain records of the following information for the catalyst:
 - a. the date the catalyst sample is taken;
 - b. the sampling method; and if a representative sample, the number of samples and from which sample cores, layers, or levels taken;
 - c. the testing methods conducted for the VOC destruction efficiency and the level of contamination/poisoning (Si, P, Cl, etc.);
 - d. test results for the VOC destruction efficiency, level of contamination or poisoning, and surface area loss (all in %); and
 - e. the date(s) of catalyst replacement; and if only partial, the amount or percent of the total catalyst replaced.

These records shall be maintained at the facility for a period of three years.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month limitations on ink or roller and blanket wash

usage; and for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative ink and roller and blanket wash usage levels. These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

2. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
 - a. each period of time when the average temperature of the exhaust gases immediately before the catalyst bed or the temperature difference across the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, is outside of the acceptable range; and
 - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
 - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the temperature into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.
 - e. any record of downtime for the catalytic oxidizer or temperature monitoring equipment, when the emissions unit was in operation;
 - f. an identification of any period of time that the ink VOC content exceeds 3.09 pounds per gallon;
 - g. an identification of any period of time that the roller and blanket wash VOC content exceeds 6.54 pounds per gallon.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

3. The permittee shall submit quarterly summaries that identify any test results demonstrating that the VOC destruction efficiency of the catalyst was less than that required to maintain compliance with the total control efficiency requirements of this permit. This report shall include the date the non-compliant test results were received, the date the spent or poisoned catalyst was replaced, as well as the hours of operation of the emissions unit between the catalyst sampling and its replacement. These

quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

4. The permittee shall also submit quarterly summaries that identify all periods of time, during the previous calendar quarter, in which sample(s) of the catalyst were not collected and testing was not conducted at the most current frequency developed, monitored, and required in the catalyst maintenance plan; and/or records were not maintained for the catalyst system as required in this permit. These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters
5. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month periods.

E. Testing Requirements

1. Emission Limitation: VOC emissions shall not exceed 39.3 tons per rolling, 12-month summation.

Applicable Compliance Method: Compliance with the annual limitation shall be assumed as long as compliance with the rolling, 12-month summation for ink and roller and blanket wash usage is maintained.

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

Applicable Compliance Method: If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

3. Emission Limitation: Particulate emissions shall not exceed 1.42 pounds per hour.

Applicable Compliance Method: If required, compliance shall be determined through particulate emission testing performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 5.

4. Emission Limitation: The permittee shall control VOC emissions from this air contaminant source through the use of a catalytic incinerator with a minimum control efficiency of 95%

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

- a. The emission testing shall be conducted within 3 months after start-up.
- 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.

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

- 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.

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic pollutant will be less than 1.0 ton. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that a new permit to install application would be required for an emissions unit if changes in the composition of the materials or use of new materials would cause the emissions of any pollutant that has a listed Threshold Limit Value (TLV), as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices"), to increase to above 1.0 ton per year.