



State of Ohio Environmental Protection Agency

Street Address:  
Lazarus Gov. Center  
122 S. Front Street  
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

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

**RE: FINAL PERMIT TO INSTALL  
STARK COUNTY  
Application No: 15-01431**

**DATE: 9/12/00**

MCA Sign Company  
Larry Finefrock  
PO Box 555 681 First St SW  
Massillon, OH 44648

EXCEL  
SEP 13 2000  
AIR QUALITY  
DIVISION

**CERTIFIED MAIL**

	TOXIC REVIEW
	PSD
Y	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 by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 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. It must be filed within thirty (30) days after the notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission -  
236 East Town Street, Room 300  
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo, Manager  
Field Operations and Permit Section  
Division of Air Pollution Control

cc: USEPA

Canton LAA



**Permit To Install  
Terms and Conditions**

**Issue Date: September 12, 2000  
Effective Date: September 12, 2000**

**FINAL PERMIT TO INSTALL 15-01431**

Application Number: 15-01431

APS Premise Number: 1576130147

Permit Fee: **\$1200**

Name of Facility: MCA Sign Company

Person to Contact: Larry Finefrock

Address: PO Box 555 681 First St SW  
Massillon, OH 44648

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**681 First St SW  
Massillon, Ohio**

Description of proposed emissions unit(s):  
**Terms in this permit supercede those identified in PTI 15-1273 issued 11/18/98.**

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

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 Related to Monitoring and Recordkeeping 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 quarterly, i.e., 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 control 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 are inadequate 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 prove to be inadequate 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 application must be made to the Director for the installation or modification of any other emissions unit(s).

#### **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 control laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) 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>
OC	87.8

**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K003 - Flexographic printing press; C-1 Flexo (Terms in this permit supercede those identified in PTI 15-1273 issued 11/18/98.)	OAC rule 3745-35-07(B)	The combined emissions of organic compounds from presses K003, K004, K005, P001, P002, & P003 shall not exceed 87.8 tons per year. This limitation shall be achieved by limiting the organic solvent usage rate to 87.8 tons per year based upon a rolling, 12-month summation of the monthly emissions. (See section II.A.2.a. below.)  Facility emission limitations: 9.9 tons of any individual HAP per rolling, 12-month period (See section II.A.2.b. below.) 24.9 tons of total HAPs per rolling, 12-month period (See section II.A.2.b. below.)
	OAC rule 3745-21-09(Y)	This emissions unit is exempt from the requirements of this rule because the coating and ink usage at this facility in all flexographic, packaging rotogravure and publication rotogravure printing lines is less than or equal to one hundred forty-eight tons per year.

**2. Additional Terms and Conditions**

- 2.a Organic solvent usage shall include the organic solvent found in the inks as employed, the makeup organic solvent added to the inks and any cleanup organic solvents employed.

Historical reports, submitted by the permittee since January of 1997, have shown that this facility is in compliance with this limit.

- 2.b** The emissions [as defined by OAC rule 3745-77-01 (BB) of hazardous air pollutants (HAPs)] from all emissions units at this facility, as identified in Section 112(b) of Title III of the Clean Air Act, shall not exceed 9.9 tons per rolling, 12-month period for any single HAP and 24.9 tons per rolling, 12-month period for any combination of HAPs. Historical reports, submitted by the permittee since January of 1997, have shown that this facility is in compliance with these limits.

**B. Operational Restrictions**

-None

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information each month in order to determine whether the combined organic solvent usage limits for presses K003, K004, K005, P001, P002, & P003 are being met:
  - a. the total monthly organic solvent usage rate from presses K003, K004, K005, P001, P002, & P003;
  - b. the rolling, 12-month organic solvent usage rate from presses K003, K004, K005, P001, P002, & P003;
  - c. the total individual HAP emissions for each HAP from all coatings, inks and cleanup materials employed in presses K003, K004, K005, P001, P002, & P003, in pounds or tons per month and pounds or tons per rolling, 12-month period; and
  - d. the total combined HAP emissions from all coatings, inks and cleanup materials employed in presses K003, K004, K005, P001, P002, & P003, in pounds or tons per month and pounds or tons per rolling, 12-month period.
2. The permittee shall collect and record the following information, on a monthly basis, for the purpose of determining annual organic compound emissions from this emissions unit:
  - a. the company identification of each cleanup material employed;
  - b. the number of gallons of each cleanup material employed;
  - c. the organic compound content of each cleanup material, in pounds per gallon;
  - d. the total organic compound emission rate for all cleanup materials, in pounds;
  - e. the company identification of each ink employed;

- f. the number of gallons of each ink employed;
- g. the organic compound content of each ink, in pounds per gallon; and
- h. the total organic compound emission rate for all inks, in pounds.

#### **D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. an identification of all exceedances of the rolling, 12-month organic solvent usage limitation of 87.8 tons from presses K003, K004, K005, P001, P002, & P003;
  - b. an identification of any rolling, 12-month period in which an individual HAP emissions exceeded 9.9 tons or the combined HAPs emissions exceeded 24.9 tons from all emissions units at this facility and the HAP emission rate for such period; and
  - c. an identification of any year in which the annual ink and coating usage exceeds a total of 148 tons from all flexographic, packaging rotogravure and publication rotogravure printing lines at this facility. This ink usage shall include any initial thinning solvents, including water, used to make the press ink ready. It shall not include any solvents used to maintain viscosity.
2. The permittee shall submit annual reports by February 1 of each year showing the total organic compound emissions from this emissions unit for the previous calendar year.

#### **E. Testing Requirements**

1. Compliance with the emission limitation(s) in the Air Emissions Summary and Section A of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation  
The total combined emissions of organic compounds from presses K003, K004, K005, P001, P002, & P003 shall not exceed 87.8 tons per year.  
  
Applicable Compliance Method  
Monthly record keeping as required by section II.C.2.
  - b. Emission Limitation  
The emissions [as defined by OAC rule 3745-77-01 (BB) of hazardous air pollutants (HAPs)] from all emissions units at this facility, as identified in Section 112(b) of Title III of the Clean Air Act, shall not exceed 9.9 tons per rolling, 12-month period for any single HAP and 24.9 tons per rolling, 12-month period for any combination of HAPs.  
  
Applicable Compliance Method  
Monthly record keeping as required by section II.C.1.

**MCA Sign Company**

**PTI Application: 15-01431**

**Issued: September 12, 2000**

**Facility ID: 1576130147**

**Emissions Unit ID: K003**

**F. Miscellaneous Requirements**

None

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

**A. Applicable Emissions Limitations and/or Control Requirements**

- 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K004 - Lithographic printing press; Harris C-5 (Terms in this permit supercede those identified in PTI 15-1273 issued 11/18/98.)	OAC rule 3745-31-05(A)(3)	This emissions unit shall only employ water-based inks. (Water-based inks shall be defined as inks whose solvent content is at least 75% water.)  30 pounds OC/hour (See section II.A.2.c. below.) 3.165 tons OC/month 38 tons OC/year
	OAC rule 3745-35-07(B)	The combined emissions of organic compounds from presses K003, K004, K005, P001, P002, & P003 shall not exceed 87.8 tons per year. This limitation shall be achieved by limiting the organic solvent usage rate to 87.8 tons per year based upon a rolling, 12-month summation of the monthly organic solvent usage figures (See section II.A.2.a. below.)
	OAC rule 3745-21-07 (G)(2)	Facility emission limitations: 9.9 tons of any individual HAP per rolling, 12-month period. (See section II.A.2.b. below.) 24.9 tons of total HAPs per rolling, 12-month period. (See section II.A.2.b. below.)  (See section II.A.2.d. below.)

**2. Additional Terms and Conditions**

- 2.a** Organic solvent usage shall include the organic solvent found in the inks as employed, the makeup organic solvent added to the inks and any cleanup organic solvents employed. Historical reports, submitted by the permittee since January of 1997, have shown that this facility is in compliance with this limit.
- 2.b** The emissions [as defined by OAC rule 3745-77-01 (BB) of hazardous air pollutants (HAPs)] from all emissions units at this facility, as identified in Section 112(b) of Title III of the Clean Air Act, shall not exceed 9.9 tons per rolling, 12-month period for any single HAP and 24.9 tons per rolling, 12-month period for any combination of HAPs. Historical reports, submitted by the permittee since January of 1997, have shown that this facility is in compliance with these limits.
- 2.c** The hourly OC emission limit of 30 lbs/hr represents the maximum potential to emit of this emissions unit; so, no recordkeeping will be required to verify compliance.
- 2.d** This emissions unit shall not employ inks or cleanup solvents which are photochemically reactive materials as defined by OAC rule 3745-21-01 (C)(5). This determination shall be based on the actual formulation of the inks or cleanup solvents after in-plant reducing or thinning and prior to application/use of the product. Prior to employing any inks or cleanup solvents which are photochemically reactive materials, the permittee shall provide written notification to, and obtain approval from the Canton local air agency. Such notification shall include information sufficient to determine that the emissions with the proposed change in materials will comply with the emission limits and/or control requirements as defined in OAC rule 3745-21-07(G)(2). This notification, at a minimum, shall include the company identification of the new material to be employed, the solvent composition of the material, and the maximum amount to be used, in pounds per hour.

**B. Operational Restrictions**

None

**C. Monitoring and/or Recordkeeping Requirements**

- 1.** The permittee shall collect and record the following information each month for the printing operation:
  - a.** the company identification for each cleanup material employed;
  - b.** documentation on whether or not each cleanup material is a photochemically reactive material; and

- c. the number of gallons of any photochemically reactive cleanup solvent employed.

[**Note:** The definitions of “photochemically reactive” and “nonphotochemically reactive” are based upon OAC rule 3745-21-01(C)(5).]

2. The permittee shall collect and record the following information each month for each ink employed in this emissions unit:
  - a. the percentage of the solvent in the ink which is water;
  - b. whether the ink contains photochemically reactive materials (PRM) as defined in OAC 3745-21-01(C)(5); and
  - c. the gallons of ink employed which contained any PRM.
3. The permittee shall collect and record the following information each month in order to determine whether the combined organic solvent usage limits for presses K003, K004, K005, P001, P002, & P003 are being met:
  - a. the total monthly organic solvent usage rate from presses K003, K004, K005, P001, P002, & P003;
  - b. the rolling, 12-month organic solvent usage rate from presses K003, K004, K005, P001, P002, & P003;
  - c. the total individual HAP emissions for each HAP from all coatings, inks, and cleanup materials employed in presses K003, K004, K005, P001, P002, & P003, in pounds or tons per month and pounds or tons per rolling, 12-month period; and
  - d. the total combined HAP emissions from all coatings, inks, and cleanup materials employed in presses K003, K004, K005, P001, P002, & P003, in pounds or tons per month and pounds or tons per rolling, 12-month period.
4. The permittee shall collect and record the following information, on a monthly basis, for the purpose of determining annual organic compound emissions from this emissions unit:
  - a. the company identification of each cleanup material employed;
  - b. the number of gallons of each cleanup material employed;
  - c. the organic compound content of each cleanup material, in pounds per gallon;
  - d. the total organic compound emission rate for all cleanup materials, in pounds;
  - e. the company identification of each ink employed;

- f. the number of gallons of each ink employed;
- g. the organic compound content of each ink, in pounds per gallon;
- h. the total organic compound emission rate for all inks, in pounds;
- i. the company identification of each makeup organic solvent employed;
- j. the number of gallons of each makeup organic solvent employed; and
- k. the total organic compound emission rate for all makeup organic solvents, in pounds.

**D. Reporting Requirements**

- 1. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. an identification of all exceedances of the rolling, 12-month usage limitation of 87.8 tons for organic solvent from presses K003, K004, K005, P001, P002, & P003;
  - b. an identification of any inks employed which are not water-based and the quantity of such ink usage;
  - c. an identification of any inks employed which are photochemically reactive materials and the quantity of such ink usage;
  - d. an identification of any cleanup materials employed which contain photochemically reactive materials and the quantity of such cleanup materials employed;
  - e. an identification of any rolling, 12-month period in which an individual HAP emissions exceeded 9.9 tons or the combined HAPs emissions exceeded 24.9 tons from all emissions units at this facility and the HAP emission rate for such periods; and
  - f. an identification of any month in which the OC emissions exceeded 3.165 tons.
- 2. The permittee shall submit annual reports by February 1 of each year showing the total organic compound emissions from this emissions unit for the previous calendar year.

**E. Testing Requirements**

- 1. Compliance with the emission limitation(s) in the Air Emissions Summary and Section A of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation  
The total combined emissions of organic compounds from presses K003, K004, K005, P001, P002, & P003 shall not exceed 87.8 tons per year.

Applicable Compliance Method

Monthly record keeping of organic solvent usage as required by section II.C.3.

b. Emission Limitation

The emissions [as defined by OAC rule 3745-77-01 (BB) of hazardous air pollutants (HAPs)] from all emissions units at this facility, as identified in Section 112(b) of Title III of the Clean Air Act, shall not exceed 9.9 tons per rolling, 12-month period for any single HAP and 24.9 tons per rolling, 12-month period for any combination of HAPs.

Applicable Compliance Method

Monthly record keeping as required by section II.C.3.

c. Emission Limitation

This emissions unit shall only employ water-based inks. (Water-based inks shall be defined as inks whose solvent content is at least 75% water.)

Applicable Compliance Method

Monthly record keeping as required by section II.C.2.

d. Emission Limitation

3.165 tons OC/month and 38 tons OC/year

Applicable Compliance Method

Monthly record keeping as required by section II.C.4.

e. Emission Limitation

30 pounds OC/hour

Applicable Compliance Method

30 pounds OC/hour represents the maximum potential to emit for this emissions unit; so, no hourly record keeping is required.

**F. Miscellaneous Requirements**

1. Pursuant to Engineering Guide #69, modeling to demonstrate compliance with the Ohio EPA's Air Toxic Policy did not apply since the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees 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 changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K005 - Lithographic printing press; Harris C-6 (Terms in this permit supercede those identified in PTI 15-1273 issued 11/18/98.)	OAC rule 3745-31-05(A)(3)	This emissions unit shall only employ water-based inks. (Water-based inks shall be defined as inks whose solvent content is at least 75% water.)  30 pounds OC/hour (See section II.A.2.c. below.) 3.165 tons OC/month 38 tons OC/year
	OAC rule 3745-35-07(B)	The combined emissions of organic compounds from presses K003, K004, K005, P001, P002, & P003 shall not exceed 87.8 tons per year. This limitation shall be achieved by limiting the organic solvent usage rate to 87.8 tons per year based upon a rolling, 12-month summation of the monthly organic solvent usage figures. (See section II.A.2.a. below.)
	OAC rule 3745-21-07(G)(2)	Facility emission limitations: 9.9 tons of any individual HAP per rolling, 12-month period (See section II.A.2.b. below.) 24.9 tons of total HAPs per rolling, 12-month period (See section II.A.2.b. below.)  (See section II.A.2.d. below.)

**2. Additional Terms and Conditions**

- 2.a** Organic solvent usage shall include the organic solvent found in the inks as employed, the makeup organic solvent added to the inks and any cleanup organic solvents employed. Historical reports, submitted by the permittee since January of 1997, have shown that this facility is in compliance with this limit.
- 2.b** The emissions [as defined by OAC rule 3745-77-01 (BB) of hazardous air pollutants (HAPs)] from all emissions units at this facility, as identified in Section 112(b) of Title III of the Clean Air Act, shall not exceed 9.9 tons per rolling, 12-month period for any single HAP and 24.9 tons per rolling, 12-month period for any combination of HAPs. Historical reports, submitted by the permittee since January of 1997, have shown that this facility is in compliance with these limits.
- 2.c** The hourly OC emission limit of 30 lbs/hr represents the maximum potential to emit of this emissions unit; so, no record keeping will be required to verify compliance.
- 2.d** This emissions unit shall not employ inks or cleanup solvents which are photochemically reactive materials as defined by OAC rule 3745-21-01 (C)(5). This determination shall be based on the actual formulation of the inks after in-plant reducing or thinning and prior to application of the product. Prior to employing any inks or cleanup solvents which are photochemically reactive materials, the permittee shall provide written notification to, and obtain approval from the Canton local air agency. Such notification shall include information sufficient to determine that the emissions with the proposed change in materials will comply with the emission limits and/or control requirements as defined in OAC rule 3745-21-07(G)(2). This notification, at a minimum, shall include the company identification of the new material to be employed, the solvent composition of the material, and the maximum amount to be used, in pounds per hour.

**B. Operational Restrictions**

None

**C. Monitoring and/or Recordkeeping Requirements**

- 1. The permittee shall collect and record the following information each month for the printing operation:

  - a. the company identification for each cleanup material employed;
  - b. documentation on whether or not each cleanup material is a photochemically reactive material; and
  - c. the number of gallons of any photochemically reactive cleanup solvent employed.

[**Note:** The definitions of “photochemically reactive” and “nonphotochemically reactive” are based upon OAC rule 3745-21-01(C)(5).]

2. The permittee shall collect and record the following information each month for each ink employed in this emissions unit:
  - a. the percentage of the solvent in the ink which is water;
  - b. whether the ink contains photochemically reactive materials (PRM) as defined in OAC 3745-21-01(C)(5); and
  - c. the gallons of ink employed which contained any PRM.
3. The permittee shall collect and record the following information each month in order to determine whether the combined organic solvent usage limits for presses K003, K004, K005, P001, P002, & P003 are being met:
  - a. the total monthly organic solvent usage rate from presses K003, K004, K005, P001, P002, & P003;
  - b. the rolling, 12-month organic solvent usage rate from presses K003, K004, K005, P001, P002, & P003;
  - c. the total individual HAP emissions for each HAP from all coatings, inks, and cleanup materials employed in presses K003, K004, K005, P001, P002, & P003, in pounds or tons per month and pounds or tons per rolling, 12-month period; and
  - d. the total combined HAP emissions from all coatings, inks, and cleanup materials employed in presses K003, K004, K005, P001, P002, & P003, in pounds or tons per month and pounds or tons per rolling, 12-month period.
4. The permittee shall collect and record the following information, on a monthly basis, for the purpose of determining annual organic compound emissions from this emissions unit:
  - a. the company identification of each cleanup material employed;
  - b. the number of gallons of each cleanup material employed;
  - c. the organic compound content of each cleanup material, in pounds per gallon;
  - d. the total organic compound emission rate for all cleanup materials, in pounds;
  - e. the company identification of each ink employed;
  - f. the number of gallons of each ink employed;

- g. the organic compound content of each ink, in pounds per gallon;
- h. the total organic compound emission rate for all inks, in pounds;
- i. the company identification of each makeup organic solvent employed;
- j. the number of gallons of each makeup organic solvent employed; and
- k. the total organic compound emission rate for all makeup organic solvents, in pounds.

#### **D. Reporting Requirements**

- 1. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. an identification of all exceedances of the rolling, 12-month usage limitation of 87.8 tons for organic solvent from presses K003, K004, K005, P001, P002, & P003;
  - b. an identification of any inks employed which are not water-based and the quantity of such ink usage;
  - c. an identification of any inks employed which are photochemically reactive materials and the quantity of such ink usage;
  - d. an identification of any cleanup materials employed which contain photochemically reactive materials and the quantity of such cleanup materials employed;
  - e. an identification of any rolling, 12-month period in which an individual HAP emissions exceeded 9.9 tons or the combined HAPs emissions exceeded 24.9 tons from all emissions units at this facility and the HAP emission rate for such periods; and
  - f. an identification of any month in which the QC emissions exceeded 3.165 tons.
- 2. The permittee shall submit annual reports by February 1 of each year showing the total organic compound emissions from this emissions unit for the previous calendar year.

#### **E. Testing Requirements**

- 1. Compliance with the emission limitation(s) in the Air Emissions Summary and Section A of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation  
The total combined emissions of organic compounds from presses K003, K004, K005, P001, P002, & P003 shall not exceed 87.8 tons per year.

##### Applicable Compliance Method

Monthly record keeping of organic solvent usage as required by section II.C.3.

b. Emission Limitation

The emissions [as defined by OAC rule 3745-77-01 (BB) of hazardous air pollutants (HAPs)] from all emissions units at this facility, as identified in Section 112(b) of Title III of the Clean Air Act, shall not exceed 9.9 tons per rolling, 12-month period for any single HAP and 24.9 tons per rolling, 12-month period for any combination of HAPs.

Applicable Compliance Method

Monthly record keeping as required by section II.C.3.

c. Emission Limitation

This emissions unit shall only employ water-based inks. (Water-based inks shall be defined as inks whose solvent content is at least 75% water.)

Applicable Compliance Method

Monthly record keeping as required by section II.C.2.

d. Emission Limitation

3.165 tons OC/month and 38 tons OC/year.

Applicable Compliance Method

Monthly record keeping as required by section II.C.4.

e. Emission Limitation

30 pounds OC/hour

Applicable Compliance Method

30 pounds OC/hour represents the maximum potential to emit for this emissions unit; so, no hourly record keeping is required.

**F. Miscellaneous Requirements**

1. Pursuant to Engineering Guide #69, modeling to demonstrate compliance with the Ohio EPA's Air Toxic Policy did not apply since the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees 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 changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P001 - Silk screen printing press; S-8 (Terms in this permit supercede those identified in PTI 15-1273 issued 11/18/98.)	OAC rule 3745-35-07(B)	The combined emissions of organic compounds from presses K003, K004, K005, P001, P002, & P003 shall not exceed 87.8 tons per year. This limitation shall be achieved by limiting the organic solvent usage rate to 87.8 tons per year based upon a rolling, 12-month summation of the monthly organic solvent usage figure. (See section II.A.2.a. below.)  Facility emission limitations: 9.9 tons of any individual HAP per rolling, 12-month period (See section II.A.2.b. below.) 24.9 tons of total HAPs per rolling, 12-month period (See section II.A.2.b. below.)  See section II.A.2.c. below.
	OAC rule 3745-21-07(G)(2)	

**2. Additional Terms and Conditions**

- 2.a Organic solvent usage shall include the organic solvent found in the inks as employed, the makeup organic solvent added to the coatings and any cleanup organic solvents employed. Historical reports, submitted by the permittee since January of 1997, have shown that this facility is in compliance with this limit.
- 2.b The emissions [as defined by OAC rule 3745-77-01 (BB) of hazardous air pollutants (HAPs)] from all emissions units at this facility, as identified in Section 112(b) of Title III of the Clean Air Act, shall not exceed 9.9 tons per rolling, 12-month period for any single

HAP and 24.9 tons per rolling, 12-month period for any combination of HAPs. Historical reports, submitted by the permittee since January of 1997, have shown that this facility is in compliance with these limits.

- 2.c** This emissions unit shall not employ inks which are photochemically reactive materials as defined by OAC rule 3745-21-01 (C)(5). This determination shall be based on the actual formulation of the inks after in-plant reducing or thinning and prior to application of the product. Prior to employing any inks which are photochemically reactive materials, the permittee shall provide written notification to, and obtain approval from the Canton local air agency. Such notification shall include information sufficient to determine that the emissions with the proposed change in materials will comply with the emission limits and/or control requirements as defined in OAC rule 3745-21-07(G)(2). This notification, at a minimum, shall include the company identification of the new material to be employed, the solvent composition of the material, and the maximum amount to be used, in pounds per hour.

**B. Operational Restrictions**

None

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information each month in order to determine whether the combined emission limits for presses K003, K004, K005, P001, P002, & P003 are being met:
  - a. the total monthly organic solvent usage rate for presses K003, K004, K005, P001, P002, & P003;
  - b. the rolling, 12-month organic solvent usage rate for presses K003, K004, K005, P001, P002, & P003;
  - c. the total individual HAP emissions for each HAP from all coatings, inks and cleanup materials employed in presses K003, K004, K005, P001, P002, & P003, in pounds or tons per month and pounds or tons per rolling, 12-month period; and
  - d. the total combined HAP emissions from all coatings, inks and cleanup materials employed in presses K003, K004, K005, P001, P002, & P003, in pounds or tons per month and pounds or tons per rolling, 12-month period.
2. The permittee shall collect and record the following information, on a monthly basis, for the purpose of determining annual organic compound emissions from this emissions unit:
  - a. the company identification of each cleanup material employed;
  - b. whether or not each cleanup material is a photochemically reactive material;

- c. the number of gallons of each cleanup material employed;
- d. the organic compound content of each cleanup material, in pounds per gallon;
- e. the total organic compound emission rate for all cleanup materials, in pounds;
- f. the company identification of each ink employed;
- g. whether or not each ink is a photochemically reactive material;
- h. the number of gallons of each ink employed;
- i. the organic compound content of each ink, in pounds per gallon; and
- j. the total organic compound emission rate for all inks, in pounds.

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. an identification of all exceedances of the rolling, 12-month organic solvent usage limitation for presses K003, K004, K005, P001, P002, & P003; and
  - b. an identification of any rolling, 12-month period in which an individual HAP emissions exceeded 9.9 tons or the combined HAPs emissions exceeded 24.9 tons from all emissions units at this facility and the HAP emission rate for such periods.
2. The permittee shall submit annual reports by February 1 of each year showing the total organic compound emissions from this emissions unit for the previous calendar year.
3. The permittee shall notify the Canton LAA in writing of any monthly record showing the use of photochemically reactive materials. The notification shall include a copy of such record as well as the actual organic compound emissions for each day that the record indicates a photochemically reactive material was employed. These reports shall be sent to the Canton LAA within 30 days following the end of the calendar month.

**E. Testing Requirements**

1. Compliance with the emission limitation(s) in the Air Emissions Summary and Section A of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation  
The total combined emissions of organic compounds from presses K003, K004, K005, P001, P002, & P003 shall not exceed 87.8 tons per year.

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**Issued: September 12, 2000**

**Facility ID: 1576130147**  
**Emissions Unit ID: P001**

Applicable Compliance Method

Monthly record keeping as required by section II.C.2.

b. Emission Limitation

The emissions [as defined by OAC rule 3745-77-01 (BB) of hazardous air pollutants (HAPs)] from all emissions units at this facility, as identified in Section 112(b) of Title III of the Clean Air Act, shall not exceed 9.9 tons per rolling, 12-month period for any single HAP and 24.9 tons per rolling, 12-month period for any combination of HAPs.

Applicable Compliance Method

Monthly record keeping as required by section II.C.1.

**F. -Miscellaneous Requirements**

None

**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P002 - Silk screen printing press; S-7 (Terms in this permit supercede those identified in PTI 15-1273 issued 11/18/98.)	OAC rule 3745-31-05(A)(3)	8 pounds OC/hour (See section II.A.2.c. below.) 0.61 ton OC/month 7.3 tons OC/year
	OAC rule 3745-35-07(B)	The combined emissions of organic compounds from presses K003, K004, K005, P001, P002, & P003 shall not exceed 87.8 tons per year. This limitation shall be achieved by limiting the organic solvent usage rate to 87.8 tons per year based upon a rolling, 12-month summation of the monthly organic solvent usage figures. (See section II.A.2.a. below.)  Facility emission limitations: 9.9 tons of any individual HAP per rolling, 12-month period (See section II.A.2.b. below.) 24.9 tons of total HAPs per rolling, 12-month period (See section II.A.2.b. below.)
	OAC rule 3745-21-07 (G)(2)	(See section II.A.2.d. below.)

**2. Additional Terms and Conditions**

- 2.a Organic solvent usage shall include the organic solvent found in the inks as employed, the makeup organic solvent added to the inks and any cleanup organic solvents employed.

Historical reports, submitted by the permittee since January of 1997, have shown that this facility is in compliance with this limit.

- 2.b** The emissions [as defined by OAC rule 3745-77-01 (BB) of hazardous air pollutants (HAPs)] from all emissions units at this facility, as identified in Section 112(b) of Title III of the Clean Air Act, shall not exceed 9.9 tons per rolling, 12-month period for any single HAP and 24.9 tons per rolling, 12-month period for any combination of HAPs. Historical reports, submitted by the permittee since January of 1997, have shown that this facility is in compliance with these limits.
- 2.c** The hourly OC emission limit of 8 lbs/hr represents the maximum potential to emit of this emissions unit; so, no record keeping will be required to verify compliance.
- 2.d** This emissions unit shall not employ inks or cleanup solvents which are photochemically reactive materials as defined by OAC rule 3745-21-01 (C)(5). This determination shall be based on the actual formulation of the inks after in-plant reducing or thinning and prior to application of the product. Prior to employing any inks or cleanup solvents which are photochemically reactive materials, the permittee shall provide written notification to, and obtain approval from the Canton local air agency. Such notification shall include information sufficient to determine that the emissions with the proposed change in materials will comply with the emission limits and/or control requirements as defined in OAC rule 3745-21-07(G)(2). This notification, at a minimum, shall include the company identification of the new material to be employed, the solvent composition of the material, and the maximum amount to be used, in pounds per hour.

**B. Operational Restrictions**

None

**C. Monitoring and/or Recordkeeping Requirements**

- 1. The permittee shall collect and record the following information each month for the printing operation:
  - a. the company identification for each cleanup material employed;
  - b. documentation on whether or not each cleanup material is a photochemically reactive material; and
  - c. the number of gallons of any photochemically reactive cleanup solvent employed.

[**Note:** The definitions of “photochemically reactive” and “nonphotochemically reactive” are based upon OAC rule 3745-21-01(C)(5).]

2. The permittee shall collect and record the following information each month for each ink employed in this emissions unit:
  - a. whether the ink contains photochemically reactive materials (PRM) as defined in OAC 3745-21-01(C)(5); and
  - b. the gallons of ink employed which contained any PRM.
  
3. The permittee shall collect and record the following information each month in order to determine whether the combined organic solvent usage limits for presses K003, K004, K005, P001, P002, & P003 are being met:
  - a. the total monthly organic solvent usage rate from presses K003, K004, K005, P001, P002, & P003;
  - b. the rolling, 12-month organic solvent usage rate from presses K003, K004, K005, P001, P002, & P003;
  - c. the total individual HAP emissions for each HAP from all coatings, inks, and cleanup materials employed in presses K003, K004, K005, P001, P002, & P003, in pounds or tons per month and pounds or tons per rolling, 12-month period; and
  - d. the total combined HAP emissions from all coatings, inks, and cleanup materials employed in presses K003, K004, K005, P001, P002, & P003, in pounds or tons per month and pounds or tons per rolling, 12-month period.
  
4. The permittee shall collect and record the following information, on a monthly basis, for the purpose of determining annual organic compound emissions from this emissions unit:
  - a. the company identification of each cleanup material employed;
  - b. the number of gallons of each cleanup material employed;
  - c. the organic compound content of each cleanup material, in pounds per gallon;
  - d. the total organic compound emission rate for all cleanup materials, in pounds;
  - e. the company identification of each ink employed;
  - f. the number of gallons of each ink employed;
  - g. the organic compound content of each ink, in pounds per gallon;
  - h. the total organic compound emission rate for all inks, in pounds;

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- i. the company identification of each makeup organic solvent employed;
- j. the number of gallons of each makeup organic solvent employed; and
- k. the total organic compound emission rate for all makeup organic solvents, in pounds.

#### **D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. an identification of all exceedances of the rolling, 12-month usage limitation of 87.8 tons for organic solvent from presses K003, K004, K005, P001, P002, & P003;
  - b. an identification of any inks employed which are photochemically reactive materials and the quantity of such ink usage;
  - c. an identification of any cleanup materials employed which contain photochemically reactive materials and the quantity of such cleanup materials employed;
  - d. an identification of any rolling, 12-month period in which an individual HAP emissions exceeded 9.9 tons or the combined HAPs emissions exceeded 24.9 tons from all emissions units at this facility and the HAP emission rate for such periods; and
  - e. an identification of any month in which the OC emissions exceeded 0.61 ton.
2. The permittee shall submit annual reports by February 1 of each year showing the total organic compound emissions from this emissions unit for the previous calendar year.

#### **E. Testing Requirements**

1. Compliance with the emission limitation(s) in the Air Emissions Summary and Section A of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation  
The total combined emissions of organic compounds from presses K003, K004, K005, P001, P002, & P003 shall not exceed 87.8 tons per year.  
  
Applicable Compliance Method  
Monthly record keeping of organic solvent usage as required by section II.C.3.
  - b. Emission Limitation  
The emissions [as defined by OAC rule 3745-77-01 (BB) of hazardous air pollutants (HAPs)] from all emissions units at this facility, as identified in Section 112(b) of Title III of the Clean Air Act, shall not exceed 9.9 tons per rolling, 12-month period for any single HAP and 24.9 tons per rolling, 12-month period for any combination of HAPs.

Applicable Compliance Method

Monthly record keeping as required by section II.C.3.

- c. Emission Limitation  
0.61 ton OC/month and 7.3 tons OC/year

Applicable Compliance Method

Monthly record keeping as required by section II.C.4.

- d. Emission Limitation  
8 pounds OC/hour

Applicable Compliance Method

8 pounds OC/hour represents the maximum potential to emit; so, no hourly record keeping is required to verify compliance.

**F. Miscellaneous Requirements**

1. Pursuant to Engineering Guide #69, modeling to demonstrate compliance with the Ohio EPA's Air Toxic Policy did not apply since the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees 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 changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P003 - Silk screen printing press and varnish coater; S-9  (Terms in this permit supercede those identified in PTI 15-1273 issued 11/18/98.)	OAC rule 3745-35-07(B)	The combined emissions of organic compounds from presses K003, K004, K005, P001, P002, & P003 shall not exceed 87.8 tons per year. This limitation shall be achieved by limiting the organic solvent usage rate to 87.8 tons per year based upon a rolling, 12-month summation of the monthly emissions. (See section II.A.2.a. below.)  Facility emission limitations: 9.9 tons of any individual HAP per rolling, 12-month period (See section II.A.2.b. below.) 24.9 tons of total HAPs per rolling, 12-month period (See section II.A.2.b. below.)  See section II.A.2.c. below.
	OAC rule 3745-21-07(G)(2)	

**2. Additional Terms and Conditions**

- 2.a Organic solvent usage shall include the organic solvent found in the inks and coatings as employed, the makeup organic solvent added to the inks and coatings and any cleanup organic solvents employed. Historical reports, submitted by the permittee since January of 1997, have shown that this facility is in compliance with this limit.
- 2.b The emissions [as defined by OAC rule 3745-77-01 (BB) of hazardous air pollutants (HAPs)] from all emissions units at this facility, as identified in Section 112(b) of Title III

of the Clean Air Act, shall not exceed 9.9 tons per rolling, 12-month period for any single HAP and 24.9 tons per rolling, 12-month period for any combination of HAPs. Historical reports, submitted by the permittee since January of 1997, have shown that this facility is in compliance with these limits.

- 2.c** This emissions unit shall not employ coatings or inks which are photochemically reactive materials as defined by OAC rule 3745-21-01 (C)(5). This determination shall be based on the actual formulation of the inks after in-plant reducing or thinning and prior to application of the product. Prior to employing any coatings or inks which are photochemically reactive materials, the permittee shall provide written notification to, and obtain approval from the Canton local air agency. Such notification shall include information sufficient to determine that the emissions with the proposed change in materials will comply with the emission limits and/or control requirements as defined in OAC rule 3745-21-07(G)(2). This notification, at a minimum, shall include the company identification of the new material to be employed, the solvent composition of the material, and the maximum amount to be used, in pounds per hour.

**B. Operational Restrictions**

None

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information each month in order to determine whether the combined emission limits for presses K003, K004, K005, P001, P002, & P003 are being met:
  - a. the total monthly organic compound emission rate from presses K003, K004, K005, P001, P002, & P003;
  - b. the rolling, 12-month organic compound emission rate from presses K003, K004, K005, P001, P002, & P003;
  - c. the total individual HAP emissions for each HAP from all inks, coatings and cleanup materials employed in presses K003, K004, K005, P001, P002, & P003, in pounds or tons per month and pounds or tons per rolling, 12-month period; and
  - d. the total combined HAP emissions from all inks, coatings and cleanup materials employed in presses K003, K004, K005, P001, P002, & P003, in pounds or tons per month and pounds or tons per rolling, 12-month period.
2. The permittee shall collect and record the following information, on a monthly basis, for the purpose of determining annual organic compound emissions from this emissions unit:
  - a. the company identification of each cleanup material employed;

- b. whether or not each cleanup material is a photochemically reactive material;
- c. the number of gallons of each cleanup material employed;
- d. the organic compound content of each cleanup material, in pounds per gallon;
- e. the total organic compound emission rate for all cleanup materials, in pounds;
- f. the company identification of each ink and coating employed;
- g. whether or not each ink and coating is a photochemically reactive material;
- h. the number of gallons of each ink and coating employed;
- i. the organic compound content of each ink and coating, in pounds per gallon; and
- j. the total organic compound emission rate for all inks and coatings, in pounds.

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. an identification of all exceedances of the rolling, 12-month emission limitation of 87.8 tons for organic compound emissions from presses K003, K004, K005, P001, P002, & P003; and
  - b. an identification of any rolling, 12-month period in which an individual HAP emissions exceeded 9.9 tons or the combined HAPs emissions exceeded 24.9 tons from all emissions units at this facility and the HAP emission rate for such periods.
2. The permittee shall submit annual reports by February 1 of each year showing the total organic compound emissions from this emissions unit for the previous calendar year.
3. The permittee shall notify the Canton LAA in writing of any monthly record showing the use of any coatings or inks that contain photochemically reactive materials. The notification shall include a copy of such record as well as the actual organic compound emissions for each day that the record indicates a photochemically reactive material was employed. These reports shall be sent to the Canton LAA within 30 days following the end of the calendar month.

**E. Testing Requirements**

1. Compliance with the emission limitation(s) in the Air Emissions Summary and Section A of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation  
The total combined emissions of organic compounds from presses K003, K004, K005, P001, P002, & P003 shall not exceed 87.8 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method

Monthly record keeping as required by section II.C.1.

- b. Emission Limitation  
The emissions [as defined by OAC rule 3745-77-01 (BB) of hazardous air pollutants (HAPs)] from all emissions units at this facility, as identified in Section 112(b) of Title III of the Clean Air Act, shall not exceed 9.9 tons per rolling, 12-month period for any single HAP and 24.9 tons per rolling, 12-month period for any combination of HAPs.

Applicable Compliance Method

Monthly record keeping as required by section II.C.2.

**F. Miscellaneous Requirements**

None