



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Lazarus Gov.
Center

RE: PERMIT TO INSTALL
HURON COUNTY
Application No: 03-10834

CERTIFIED MAIL

DATE: 8/24/2000

R R Donnelley & Sons Company
Christopher Hassmann
1145 Conwell Ave
Willard, OH 448880002

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 Directors 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
Jim Orlemann Ohio EPA, DAPC, Engineering

NWDO



**Permit To Install
Terms and Conditions**

**Issue Date: 8/24/2000
Effective Date: 8/24/2000**

PERMIT TO INSTALL 03-10834

Application Number: **03-10834**
APS Premise Number: **0339030135**
Permit Fee: **\$3000**
Name of Facility: **R R Donnelley & Sons Company**
Person to Contact: **Christopher Hassmann**
Address: **1145 Conwell Ave
Willard, OH 448880002**

Location of proposed air contaminant source(s) [emissions unit(s)]:
**1145 Conwell Ave
Willard, OHIO**

Description of proposed emissions unit(s):
8 paper separation processes; 6 book binding lines.

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

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GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. 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.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES

The proposed source(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 source(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 Ohio Administrative Code (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 applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

PUBLIC DISCLOSURE

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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.

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

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.

PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

SOURCE OPERATION 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 and regulations.

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **R R Donnelley & Sons Company** located in **HURON** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

	P021		P028	
<u>Ohio EPA Source Number</u>				<u>Source Identification Description</u>
P009		P025	P029	8.0 TPH paper separation process cyclone #4
	P022			
P014 (mod)		P026	P030	8.0 TPH paper separation process cyclone #6 (modified to increase the capacity of the unit)
	P023		P031	9.9 TPH paper separation process cyclone #7 (modified to increase the capacity of the unit)
P015 (mod)		P027		
	P024			Solvent dipping operation, book binding line #5

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u> of this permit.
		8.0 TPH paper separation process cyclone #3		
	Solvent dipping operation, book binding line #10	8.0 TPH paper separation process cyclone #8	<u>BAT Determination</u>	Use of only non-photo-chemically reactive materials, compliance with the Air Toxics Policy and compliance with the terms and conditions of this permit.
Solvent dipping operation, book binding line #6	Solvent dipping operation, book binding line #48 box		Compliance with the terms and conditions of this permit.	Use of only non-photo-chemically reactive materials, compliance with the Air Toxics Policy and compliance with the terms and conditions of this permit.
Solvent dipping operation, book binding line #7	8.0 TPH paper separation process cyclone #5		Compliance with the terms and conditions of this permit.	Use of only non-photo-chemically reactive materials, compliance with the Air Toxics Policy and compliance with the terms and conditions of this permit.
	8.0 TPH paper separation process cyclone #1		Compliance with the terms and conditions of this permit.	Use of only non-photo-chemically reactive materials, compliance with the Air Toxics Policy and compliance with the terms and conditions of this permit.
Solvent dipping operation, book binding line #9	8.0 TPH paper separation process cyclone #2		Use of only non-photo-chemically reactive materials, compliance with the Air Toxics Policy and compliance with the terms and conditions	Use of only non-photo-chemically reactive materials, compliance with the

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
Air Toxics Policy and compliance with the terms and conditions of this permit.	Compliance with the terms and conditions of this permit.			3745-21-07(G) 3745-31-05
	Compliance with the terms and conditions of this permit.		Applicable Federal & <u>OAC Rules</u> 3745-31-05	
				3745-21-07(G) 3745-31-05
Use of only non-photo-chemically reactive materials	Compliance with the terms and conditions of this permit.		3745-31-05	3745-21-07(G) 3745-31-05
compliance with the Air Toxics Policy and compliance with the terms and conditions of this permit.	Compliance with the terms and conditions of this permit.		3745-31-05	
	Compliance with the terms and conditions of this permit.		3745-31-05	3745-21-07(G) 3745-31-05
				3745-21-07(G)

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
3745-31-05	3745-31-05			
3745-21-07(G)				
3745-31-05				
3745-31-05				
3745-31-05				
3745-31-05				

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
		OC/yr (combined emissions from P021, P022, P023, P024, P025, and P026)	*	P029, P030 and P031)
	Permit Allowable Mass Emissions and/or Control/Usage Requirements	*	3.55 lbs OC/hr, 31.8 tons OC/yr (combined emissions from P021, P022, P023, P024, P025, and P026)	8.0 lbs PE/hr, 24.9 tons PE/yr (combined emissions from P009, P014, P027, P028, P029, P030 and P031)
	8.0 lbs of particulate emissions (PE)/hr, 24.9 tons PE/yr (combined emissions from P009, P014, P027, P028, P029, P030 and P031)	3.55 lbs of (OC)/hr, 31.8 tons OC/yr (combined emissions from P021, P022, P023, P024, P025, and P026)	*	
	8.0 lbs of (PE)/hr, 24.9 tons PE/yr (combined emissions from P009, P014, P027, P028, P029, P030 and P031)	*	8.0 lbs PE/hr, 24.9 tons PE/yr (combined emissions from P009, P014, P027, P028, P029, P030 and P031)	
	9.9 lbs of (PE)/hr, 24.9 tons PE/yr not combined	3.55 lbs of compounds (OC)/hr, 31.8 tons OC/yr (combined emissions from P021, P022, P023, P024, P025, and P026)	*	8.0 lbs PE/hr, 24.9 tons PE/yr (combined emissions from P009, P014, P027, P028, P029, P030 and P031)
	3.55 lbs of organic compounds (OC)/hr, 31.8 tons	3.91 lbs OC/hr, 31.8 tons OC/yr (combined emissions from P021, P022, P023, P024, P025, and P026)		8.0 lbs PE/hr, 24.9 tons PE/yr (combined emissions from P009, P014, P027, P028,

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- * The BAT requirement of the use of only non-photochemically reactive materials in these emissions units negates the applicability of, and the limits established by, OAC rule 3745-21-07(G)(2).

SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
PE	49.8
OC	31.8

RECORD(S) RETENTION AND AVAILABILITY

All records required by this Permit to Install shall be retained on file for a period of not less than three years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to Northwest District, 347 North Dunbridge Road, Bowling Green, Ohio 43402.

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control

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system(s) shall be reported immediately to the Northwest District, 347 North Dunbridge Road, Bowling Green, Ohio 43402.

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

A. Applicable Emissions Limitations and/or Control Requirements

There are no additional applicable emissions limitations and/or control requirements other than those detailed in the Air Emission Summary.

B. Operational Restrictions

1. This permit allows the use of materials specified by the permittee in the permit to install application for emissions units P021, P022, P023, P024, P025 and P026. To fulfill the best available technology requirements of OAC rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitations specified in this permit were established using the Ohio EPA's "Air Toxic Policy" and are based on both the materials used and the design parameters of each emissions unit's exhaust system, as specified in the application. Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: Isopropyl Alcohol

TLV (ug/m³): 980,000

Maximum Hourly Emission Rate (lbs/hr): 21.7

Predicted 1-Hour Maximum Ground-Level Concentration at the Fence Line (ug/m³): 3,279

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³): 23,333

The following additional conservative assumptions were made for emissions units P021, P022, P023, P024, P025 and P026:

- a. it was assumed that all OC (isopropyl alcohol) emissions from the six emissions units are coming from one stack;
 - b. modeling was done as if all of the emissions units were installed at the same time instead of looking at the chronological installation dates of the emissions units;
2. 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 the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":
- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
 - b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
 - c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and,
 - d. 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.
3. Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:
- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
 - b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and,
 - c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.
4. For any change to the emissions unit or its method of operation that either would require an

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increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

5. The maximum annual production rate for emissions units P009, P014, P027, P028, P029, P030 and P031 shall not exceed 49,000 tons of paper shredded and baled, based upon a rolling, 12-month summation of the production rates.

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

<u>Month</u>	<u>Maximum Allowable Cumulative Production</u>
1	5,952 tons
1-2	11,904 tons
1-3	17,856 tons
1-4	23,808 tons
1-5	29,760 tons
1-6	35,712 tons
1-7	41,664 tons
1-8	47,616 tons
1-9	49,800 tons
1-10	49,800 tons
1-11	49,800 tons
1-12	49,800 tons

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual production rate limitation shall be based upon a rolling, 12-month summation of the production rates.

6. The maximum annual production rate for emissions unit P015 shall not exceed 49,800 tons of paper shredded and baled, based upon a rolling, 12-month summation of the production rates.

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

<u>Month</u>	<u>Maximum Allowable Cumulative Production</u>
1	7,366 tons
1-2	14,732 tons

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1-3	22,098 tons
1-4	29,464 tons
1-5	36,830 tons
1-6	44,196 tons
1-7	49,800 tons
1-8	49,800 tons
1-9	49,800 tons
1-10	49,800 tons
1-11	49,800 tons
1-12	49,800 tons

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual production rate limitation shall be based upon a rolling, 12-month summation of the production rates.

7. The combined maximum annual isopropyl alcohol or OC input rate for emissions units P021, P022, P023, P024, P025 and P026 shall not exceed 9170 gallons of isopropyl alcohol or 31.8 tons of OC, based upon a rolling, 12-month summation of the usage rates.

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

<u>Month</u>	<u>Maximum Allowable Cumulative OC Input Limitation</u>
1	1500 gallons (4.9 tons)
1-2	3000 gallons (9.8 tons)
1-3	4500 gallons (14.7 tons)
1-4	6000 gallons (19.6 tons)
1-5	7800 gallons (24.6 tons)
1-6	9000 gallons (29.5 tons)
1-7	9170 gallons (31.8 tons)
1-8	9170 gallons (31.8 tons)
1-9	9170 gallons (31.8 tons)
1-10	9170 gallons (31.8 tons)
1-11	9170 gallons (31.8 tons)
1-12	9170 gallons (31.8 tons)

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual OC input limitation shall be based upon a rolling, 12-month summation of the input rates.

8. The permittee shall only employ materials in emissions units P021, P022, P023, P024, P025 and P026 that are not photochemically reactive. "Photochemically reactive material" is defined in OAC

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rule 3745-21-01(C)(5).

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for emissions units P021, P022, P023, P024, P025 and P026 for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
 - a. background data that describes the parameters change (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and,
 - b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

2. The permittee shall maintain monthly records of the following information for emissions units P009, P014, P027, P028, P029, P030 and P031:
 - a. the production rate (amount of paper shredded and baled) for each month; and,
 - b. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the production rates.

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative production rate for each calendar month.

3. The permittee shall maintain monthly records of the following information for emissions unit P015:
 - a. the production rate (amount of paper shredded and baled) for each month; and,
 - b. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the production rates.

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative production rate for each calendar month.

4. The permittee shall maintain the following monthly records for the book binding lines, emission units P021, P022, P024, P025 and P026:
 - a. total isopropyl alcohol usage at the facility in the book binding lines (P021, P022, P023, P024, P025 and P026); and,

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- b. the calculated OC emission rate, in pounds/month [$a \times 6.55$ lbs OC/gal (or actual OC content if less)] and,
 - c. for emissions units P021, P022, P023, P024, P025 and P026: Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the input rates. In addition, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative input rate for each calendar month.
5. 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, if a strip-chart recorder is employed, for continuous monitoring instrumentation, and copies of all reports required by the permit. Such records may be maintained in computerized form.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports for emissions units (1) P015 and (2) P009, P014, P027, P028, P029, P030 and P031 combined that identify all exceedances of the rolling, 12-month production rate limitations and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative production levels. These reports are due by the date described in Condition D.3. of the Additional Special Terms and Conditions of this permit.
2. The permittee shall submit deviation (excursion) reports for emissions units P021, P022, P023, P024, P025 and P026 that identify all exceedances of the rolling, 12-month isopropyl alcohol input rate limitations and, for the first 12 calendar months of operation following the issuance of this permit, all exceedance of the maximum allowable cumulative input levels. These reports are due by the date described in condition D.3. of the Additional Special Terms and Conditions of this permit.
3. The permittee shall submit reports in the following manner for emissions units P009, P014, P015, P021, P022, P023, P024, P025, P026, P027, P028, P029, P030, and P031:
 - a. reports of any required information shall be submitted to the Ohio EPA Northwest District Office; and,

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- b. except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) 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, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA Northwest District Office. If no deviations occurred during a calendar quarter, a quarterly report shall be submitted which states that no deviations occurred during that quarter. The reports shall be submitted 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).
4. The compliance status of each emissions unit shall be reported pursuant to the annual certification required by OAC rule 3745-77-07(C)(5).
5. The actual annual emissions data for each emissions unit shall be reported pursuant to the fee emissions report required by OAC rule 3745-78-02(A).

E. Testing Requirements/Compliance Methods Determination

1. Compliance Method Requirements: Compliance with the emissions limitation(s) in section A.1. of these Additional Special Terms and Conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation P009

8.0 pounds particulate matter/hour

Applicable Compliance Method

The test method employed to demonstrate compliance with the emission limitation of 6.7 pounds particulate matter/hour shall be Method 5 which is located in 40 CFR Part 60, Appendix A. In the absence of Ohio EPA requiring such testing, the permittee may calculate actual particulate matter emission rates for the unit utilizing the method specified in the PTI application.

- b. Emission Limitation P014

8.0 pounds particulate matter/hour

Applicable Compliance Method

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The test method employed to demonstrate compliance with the emission limitation of 8.0 pounds particulate matter/hour shall be Method 5 which is located in 40 CFR Part 60, Appendix A. In the absence of Ohio EPA requiring such testing, the permittee may calculate actual particulate matter emission rates for the unit utilizing the method specified in the PTI application.

c. Emission Limitation P015

9.9 pounds particulate matter/hour

Applicable Compliance Method

The test method employed to demonstrate compliance with the emission limitation of 9.9 pounds particulate matter/hour shall be Method 5 which is located in 40 CFR Part 60, Appendix A. In the absence of Ohio EPA requiring such testing, the permittee may calculate actual particulate matter emission rates for the unit utilizing the method specified in the PTI application.

d. Emission Limitation P021

3.55 pounds organic compounds/hour

Applicable Compliance Method

This hourly limitation represents the emissions unit's "maximum capacity" based on the maximum hourly isopropyl alcohol application rate. Although this permit does not require periodic recordkeeping to verify compliance with this limitation, the permittee shall maintain adequate records in the facility's files to verify that the emissions unit's maximum capacity has not been increased.

e. Emission Limitation P022

3.55 pounds organic compounds/hour

Applicable Compliance Method

This hourly limitation represents the emissions unit's "maximum capacity" based on the maximum hourly isopropyl alcohol application rate. Although this permit does not require

periodic recordkeeping to verify compliance with this limitation, the permittee shall maintain adequate records in the facility's files to verify that the emissions unit's maximum capacity has not been increased.

f. Emission Limitation P023

3.55 pounds organic compounds/hour

Applicable Compliance Method

This hourly limitation represents the emissions unit's "maximum capacity" based on the maximum hourly isopropyl alcohol application rate. Although this permit does not require periodic recordkeeping to verify compliance with this limitation, the permittee shall maintain adequate records in the facility's files to verify that the emissions unit's maximum capacity has not been increased.

g. Emission Limitation P024

3.55 pounds organic compounds/hour, 23.2 tons OC/year

Applicable Compliance Method

This hourly limitation represents the emissions unit's "maximum capacity" based on the maximum hourly isopropyl alcohol application rate. Although this permit does not require periodic recordkeeping to verify compliance with this limitation, the permittee shall maintain adequate records in the facility's files to verify that the emissions unit's maximum capacity has not been increased.

h. Emission Limitation P025

3.91 pounds organic compounds/hour, 39.0 tons OC/year

Applicable Compliance Method

This hourly limitation represents the emissions unit's "maximum capacity" based on the maximum hourly isopropyl alcohol application rate. Although this permit does not require periodic recordkeeping to verify compliance with this limitation, the permittee shall maintain adequate records in the facility's files to verify that the emissions unit's maximum capacity has not been increased.

i. Emission Limitation P026

3.55 pounds organic compounds/hour, 23.2 tons OC/year

Applicable Compliance Method

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This hourly limitation represents the emissions unit's "maximum capacity" based on the maximum hourly isopropyl alcohol application rate. Although this permit does not require periodic recordkeeping to verify compliance with this limitation, the permittee shall maintain adequate records in the facility's files to verify that the emissions unit's maximum capacity has not been increased.

j. Emission Limitation P027

8.0 pounds particulate matter/hour

Applicable Compliance Method

The test method employed to demonstrate compliance with the emission limitation of 8.0 pounds particulate matter/hour shall be Method 5 which is located in 40 CFR Part 60, Appendix A. In the absence of Ohio EPA requiring such testing, the permittee may calculate actual particulate matter emission rates for the unit utilizing the method specified in the PTI application.

k. Emission Limitation P028

8.0 pounds particulate matter/hour

Applicable Compliance Method

The test method employed to demonstrate compliance with the emission limitation of 8.0 pounds particulate matter/hour shall be Method 5 which is located in 40 CFR Part 60, Appendix A. In the absence of Ohio EPA requiring such testing, the permittee may calculate actual particulate matter emission rates for the unit utilizing the method specified in the PTI application.

l. Emission Limitation P029

8.0 pounds particulate matter/hour

Applicable Compliance Method

The test method employed to demonstrate compliance with the emission limitation of 8.0 pounds particulate matter/hour shall be Method 5 which is located in 40 CFR Part 60, Appendix A. In the absence of Ohio EPA requiring such testing, the permittee may calculate actual particulate matter emission rates for the unit utilizing the method specified in the PTI application.

m. Emission Limitation P030

8.0 pounds particulate matter/hour

Applicable Compliance Method

The test method employed to demonstrate compliance with the emission limitation of 8.0 pounds particulate matter/hour shall be Method 5 which is located in 40 CFR Part 60, Appendix A. In the absence of Ohio EPA requiring such testing, the permittee may calculate actual particulate matter emission rates for the unit utilizing the method specified in the PTI application.

n. Emission Limitation P031

8.0 pounds particulate matter/hour

Applicable Compliance Method

The test method employed to demonstrate compliance with the emission limitation of 8.0 pounds particulate matter/hour shall be Method 5 which is located in 40 CFR Part 60, Appendix A. In the absence of Ohio EPA requiring such testing, the permittee may calculate actual particulate matter emission rates for the unit utilizing the method specified in the PTI application.

o. Emission Limitation P009, P014, P027, P028, P029, P030 and P031

24.9 tons particulate matter/year

Applicable Compliance Method

Compliance shall be based upon the recordkeeping specified in Section C.2. of the Additional Special Terms and Conditions of this permit.

p. Emission Limitation P015

24.9 tons particulate matter/year

Applicable Compliance Method

R R Donnelley & Sons Company
PTI Application: 03-10834
Issued: 8/24/2000

Facility ID: **0339030135**

Compliance shall be based upon the recordkeeping specified in Section C.3. of the Additional Special Terms and Conditions of this permit.

q. Emission Limitation P021, P022, P023, P024, P025, and P026

31.8 tons particulate matter/year

Applicable Compliance Method

Compliance shall be based upon the recordkeeping specified in Section C.7. of the Additional Special Terms and Conditions of this permit.

F. Miscellaneous Requirements

None.