



State of Ohio Environmental Protection Agency

**RE: PERMIT TO INSTALL REGISTRATION CERTIFIED MAIL  
LUCAS COUNTY**

Street Address:

122 S. Front Street

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

Mailing Address:

Lazarus Gov. Center  
P.O. Box 1049

**Application No: 04-01234**

**DATE: 2/22/2001**

LBA Custom Printing  
Larry Jankowski  
207 Arco Drive  
Toledo, OH 43635-2679

Enclosed please find an Ohio EPA Permit to Install Registration which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit registration 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  
Field Operations and Permit Section  
Division of Air Pollution Control

cc: TDES



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY  
PERMIT TO INSTALL REGISTRATION

Per  
To

Application Number: 04-01234  
APS Premise Number: 0448011700  
Permit Fee: **\$200**  
Name of Facility: LBA Custom Printing  
Person to Contact: Larry Jankowski  
Address: 207 Arco Drive  
Toledo, OH 43635-2679

Location of proposed air contaminant source(s) [emissions unit(s)]:

**207 Arco Drive  
Toledo, Ohio**

Description of proposed emissions unit(s):

**non-heatset sheetfed lithographic printing press.**

Date of Issuance: 2/22/2001

Effective Date: 2/22/2001

The above named entity is hereby granted a Permit to Install Registration for the above described source(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 source(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 source(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 laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized

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

#### **5. Scheduled Maintenance/Malfunction Reporting**

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

#### **6. Permit Transfers**

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

#### **7. Air Pollution Nuisance**

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

#### **8. Termination of Permit to Install**

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

#### **9. Construction of New Sources(s)**

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio

Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

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

#### **10. Public Disclosure**

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

#### **11. Applicability**

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit to Install. Separate 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 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.

**LBA Custom Printing**PTI Application: **04-01234****Issued: 2/22/2001**Facility ID: **0448011700****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>
organic compounds	4.1

**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>
K002 - non-heatset sheetfed lithographic printing press	OAC rule 3745-31-05	OC - 1.21 pounds per hour, and OC - 4.1 tons per year.
	3745-21-07 (G), (G)(3), (G)(9)(f)	See Section A.2.a.

**2. Additional Terms and Conditions**

- 2.a The emission limitations established through this applicable rule are equal to, or less stringent than, the best available technology determination of OAC rule 3745-31-05.

**B. Operational Restrictions**

The permittee shall be restricted to the employment of materials in this emissions unit as specified below:

- 1. printing inks and coatings - a maximum 24% OC by weight as a monthly volume-weighted average.
- 2. fountain solution - a maximum 9% OC by volume as applied as a monthly volume-weighted average.
- 3. all liquid organic materials used shall be non-photochemically reactive.

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

The permittee shall collect and record the following information for each month for this emissions unit:

- 1. The company identification for each material employed (i.e., printing inks and coatings, fountain solution or clean-up material).
- 2. The number of gallons or pounds of each material employed.

3. The organic compound content of each material, in percent by volume or percent by weight as required by Section B..
4. The total organic compound emission rate for all materials employed, in pounds per month.
5. The total number of hours the emissions unit was in operation.
6. The average hourly organic compound emission rate for all materials employed, i.e., (4.)/(5.), in pounds per hour (average).
7. A determination of the reactivity of each material used in this emissions unit, i.e., photochemically reactive or non-photochemically reactive.

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports identifying any monthly record which shows that the hourly OC emission rate or material OC content exceeds the applicable limitation.
2. The permittee shall submit deviation (excursion) reports that identify each day when photochemically reactive material(s) was (were) used in this emissions unit.
3. Each report shall be submitted within 30 days of the discovery of an exceedance.

**E. Testing Requirements**

Compliance with the emission limitation(s) of these terms and conditions shall be determined in accordance with the following methods(s):

1. Emission Limitation:

OC - 1.21 pounds per hour, 4.1 tons per year.

Applicable Compliance Method:

Compliance shall be demonstrated through a summation of the respective contributions of OC emissions from the printing ink and coating, fountain solution and clean-up materials, and determined through the record keeping requirements of Section C.1. through C.6. USEPA Method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials employed in the emissions unit.

2. Emission Limitation:

The permittee shall employ only non-photochemically reactive materials in this emissions unit.

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**LBA C**

PTI A<sub>1</sub>

**Issued: 2/22/2001**

Emissions Unit ID: **K002**

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping requirements of Section C.7. using the definition of photochemically reactive material stated in OAC rule 3745-21-01(C)(5).

**F. Miscellaneous Requirements**

None



**NEW SOURCE REVIEW FORM B**

PTI Number: 04-01234

Facility ID: 0448011700

FACILITY NAME LBA Custom Printing

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FACILITY DESCRIPTION	non-heatset sheetfed lithographic printing	CITY/TWP	Toledo
	<u>press</u>		

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**LBA C**  
PTI A<sub>j</sub>

Emissions Unit ID: **K001**

This PTI is for a non-heatset sheetfed offset lithographic printing press for miscellaneous printed materials. The line has one Mitsubishi 6 color print unit. This unit will be installed in October of this year. The primary sources of OC are the printing units, fountain solutions and clean-up solvents. Control will be by restrictions on the VOC concentrations. Permitting will follow the guide of PTI 04-1198 issued December 1, 1999.

#### BAT Determination

This BAT has been utilized in PTIs 04-1040, 1113, 1143 & 1176: printing inks - a maximum 24% OC by weight, and fountain solution - 9% OC by volume maximum as applied. No particulate or opacity is anticipated.

#### Potential to emit

Total potential to emit for OC equals 1.21 pounds per hour and 4.1 tons per year based on calculations completed by an inspector from the small business assistance program.

#### Permit allowable emissions

Permit allowable emissions will be set at potential to emit levels.

#### Actual emissions

Actual emissions were based on usage records for a similar unit (04-1198) at 2.8 tons. Operating time estimated at 6240 hours per year for actual OC emissions of 0.90 pounds per hour.

#### Air Toxics

No listed air toxic exceeds the one ton per year trigger rate.

#### Other Applicable Regulations

NSPS, PSD, CEM, NESHAPs and Emission Offsets do not apply.

#### Fees

1 process at 1000#/hr = \$200

**LBA C**

**PTI A<sub>j</sub>**

Emissions Unit ID: **K001**

**Please complete:**

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

<u>Pollutant</u>	<u>Tons Per Year</u>
organic compounds	4.1