



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL CERTIFIED MAIL  
HIGHLAND 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: 05-11308**

**DATE: 2/6/2001**

Banta Publications Greenfield  
Jim Weller  
1025 N Washington St  
Greenfield, OH 45123

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

SWDO



Permit To Install

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**FINAL PERMIT TO INSTALL 05-11308**

Application Number: 05-11308  
APS Premise Number: 0536010011  
Permit Fee: **\$400**  
Name of Facility: Banta Publications Greenfield  
Person to Contact: Jim Weller  
Address: 1025 N Washington St  
Greenfield, OH 45123

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**1025 N Washington St**  
**Greenfield, Ohio**

Description of proposed emissions unit(s):  
**9 unit web offset lithographic heatset printing press with regenerative thermal oxidizer.**

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 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 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.

**Banta Publications Greenfield**  
**PTI Application: 05-11308**  
**Issued: 2/6/2001**

**Facility ID: 0536010011**

**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	29.22

**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>
R006 - 9 unit web heatset lithographic printing press (HWOPL)	OAC rule 3745-21-07(G)(6) OAC rule 3745-17-11 OAC rule 3745-31-05 OAC rule 3745-17-07

OAC rule 3745-21-07(G)(2)

Applicable Emissions  
Limitations/Control Measures

160.1 pounds per day ("lbs/day")  
organic compounds ("OC"),  
including any fugitive emissions

29.22 tons per year ("tpy") OC,  
including any fugitive emissions

Natural gas combustion emissions  
shall not exceed the following for  
the thermal oxidizer serving this  
emissions unit:

- 0.38 lbs/day particulates
- 0.12 lbs/day SO<sub>2</sub>
- 19.97 lbs/day NO<sub>x</sub>
- 16.77 lbs/day CO

5% opacity, as a six minute  
average, from the stack of the  
thermal oxidizer

This emissions unit shall  
incorporate the use of a thermal  
oxidizer with a destruction  
efficiency of at least 92%.

See 2.a through 2.e below.

See 2.f below

See 2.f below

See 2.f below

See 2.f below

**2. Additional Terms and Conditions**

- 2.a** Emissions from natural gas combustion in the dryer are exempt from regulation per OAC rule 3745-31-03(A)(1)(c).
- 2.b** The OC content of the inks employed in this emissions unit shall not exceed 45%, by weight.
- 2.c** The OC content of the fountain solution employed shall not exceed 1.97 pounds per gallon.
- 2.d** The OC content of the organic cleanup material employed in this emissions unit shall not exceed 7.2 pounds per gallon.
- 2.e** The controlled emissions of OC from the thermal oxidizer shall not exceed 3.38 pounds per hour.
- 2.f** The emission limitation required by this applicable rule is equal to or less stringent than the emissions limitation established by best available technology under OAC rule 3745-31-05.

## **B. Operational Restrictions**

- 1. All OC emissions venting from the dryer oven shall be reduced by the use of the thermal oxidizer.
  - a. The average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit is in operation, shall not less than 1400 degrees Fahrenheit.
- 2. The dryer oven and thermal oxidizer for this emissions unit shall only employ natural gas as fuel.
- 3. The maximum ink usage in this emissions unit shall not exceed 109.0 pounds per hour and 2616.0 pounds per day.
- 4. The maximum fountain solution usage in this emissions unit shall not exceed 32.4 gallons per day and 11,826 gallons per year.
- 5. The maximum organic cleanup material usage from the blanket wash and the hand wash in this emissions unit shall not exceed 15.03 gallons per day and 5487 gallons per year.

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

- 1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal oxidizer when the emissions

unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

2. The permittee shall collect and record the following information each month for this emissions unit:
  - a. the company identification for each ink, fountain solution and cleanup material employed in this emissions unit;
  - b. the total amount of each ink employed by this emissions unit, in pounds [monthly and year-to-date ("YTD")];
  - c. the total amount of each fountain solution employed in this emissions unit, in gallons (monthly and YTD);
  - d. the total amount of each cleanup material employed by this emissions unit, in gallons (monthly and YTD);
  - e. the OC content of each ink employed in this emissions unit, in percent by weight;
  - f. the OC content of each fountain solution employed in this emissions unit, in pounds per gallon;
  - g. the OC content of each cleanup material employed in this emissions unit, in pounds per gallon;
  - h. the total number of hours the emissions unit was in operation;
  - i. the total number of days the emissions unit was in operation;
  - j. the total amount of all inks employed by this emissions unit, i.e., the sum of the amounts of all inks listed in 2.b. (monthly);
  - k. the average amount of all inks employed by this emissions unit, in pounds per hour, i.e., 2.j. (monthly)/2.h.;
  - l. the average amount of all inks employed by this emissions unit, in pounds per day, i.e., 2.j. (monthly)/2.i.;

- m. the average amount of all fountain solution employed by this emissions unit, in gallons per day, i.e., the sum of all the fountain solutions listed in 2.c. (monthly)/2.i.;
- n. the average amount of all cleanup material employed by this emissions unit, in gallons per day, i.e., the sum of all the cleanup materials listed in 2.d. (monthly)/2.i.;
- o. the uncontrolled OC emission rate from the dryer oven for all inks, in pounds, i.e., the sum of the amount of each ink listed in 2.b. (monthly) multiplied by its associated OC content listed in 2.e. multiplied by (0.8)\*;
- p. the uncontrolled OC emission rate from the dryer oven for all fountain solutions, in pounds, i.e., the sum of the amount of each fountain solution listed in 2.c. (monthly) multiplied by its associated OC content listed in 2.f. multiplied by (0.7)\*;
- q. the total uncontrolled average OC emission rate from the dryer oven, in pounds, i.e., (2.o. + 2.p.);
- r. the uncontrolled average OC emission rate from the dryer oven, in lbs/day, i.e., (2.q./2.i.);
- s. the total fugitive OC emission rate for all fountain solutions, in pounds, i.e., the sum of the amount of each fountain solution listed in 2.c. (monthly) multiplied by its associated OC content listed in 2.f. multiplied by (0.3)\*;
- t. the total fugitive OC emission rate for all hand wash cleanup materials, in pounds, i.e., the sum of the amount of each hand wash cleanup material listed in 2.d. (monthly) multiplied by its associated OC content listed in 2.g. multiplied by (0.5)\*;
- u. the total fugitive OC emission rate, in pounds, i.e., (2.s. + 2.t.);
- v. the total fugitive OC emission rate, in lbs/day, i.e., (2.u. / 2.i.);
- w. the total OC emissions from the incinerator, in pounds, i.e., 2.q. x (1 - 92%)\*\* ;
- x. the total average OC emissions from the incinerator, in pounds per hour, i.e., (2.w./2.h.);
- y. the total average OC emissions from the incinerator, in lbs/day, i.e., (2.w./2.i.);
- z. the total average OC emissions (fugitive and controlled), in lbs/day, i.e., (2.v. + 2.y.);
- aa. the total OC emissions (fugitive and controlled), in tons YTD, i.e., [the sum of (2.u. +

- 2.w.) for each past month of the calendar year]/(2000 lbs/ton);
- bb. the log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation;
- cc. all 3-hour blocks of time during which the average temperature within the thermal oxidizer, when the emissions unit was in operation, was below 1400 degrees Fahrenheit.
- \* Per DAPC guidance, the following assumptions will be used in calculating the OC emissions for this emissions unit: 20 percent (by weight) of the solvent in the inks is retained in the web after the dryer. The remaining 80 percent (by weight) of the OCs in the inks is vented to the thermal oxidizer. 30 percent of the fountain solution emissions is fugitive, and 70 percent is vented to the thermal oxidizer. The cleanup operations can assume 50 percent of the solvent is retained in the cloths and 50 percent is emitted as fugitive, if the cleanup cloths are stored in a closed container and the solvent has a vapor pressure of 10 mmHg or lower at 20 degrees Celsius (68 deg. F.).
- \*\* A destruction efficiency of 92% was indicated on the permit to install application. The decimal equivalent to the latest destruction efficiency testing required in Section E.3. of this permit will be used in place of the 0.92 in this equation for future OC incinerator emissions calculations.

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

1. The permittee shall submit deviation (excursion) reports to Ohio EPA Southwest District Office ("SWDO") in writing of all records showing the following:  
  
the use of ink(s) with greater than 45%, by weight, OC content;  
  
the use of fountain solution(s) with greater than 1.97 pounds per gallon OC content;  
  
the use of cleanup material(s) with greater than 7.2 pounds per gallon OC content;  
  
all 3-hour blocks of time during which the average temperature within the thermal oxidizer, when the emissions unit was in operation, was below 1400 degrees Fahrenheit.
2. The permittee shall notify Ohio EPA Southwest District Office in writing of each monthly record showing any exceedance of the following:

160.1 lbs/day total average OC emissions;

3.38 lbs/hour average OC emissions from the thermal oxidizer; and

32.4 gallons per day of fountain solution, 15.03 gallons per day of organic cleanup material, and/or 109.0 pounds per hour or 2616.0 pounds per day of ink are employed.

The notification shall include a copy of such record and shall be sent to Ohio EPA, Southwest District Office ("SWDO"), within 30 days following the end of the calendar month.

- 3. The permittee shall submit quarterly summaries which include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation. These summaries shall be submitted by February 15, May 15, August 15, and November 15 of each year and shall cover the previous calendar quarters.
- 4. The permittee shall submit annual reports to SWDO which specify the total tons of organic compound emissions from this emissions unit, as well as the number of gallons of fountain solution and OC containing cleanup material employed by this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

**E. Testing Requirements**

- 1. Compliance with the allowable emission limitations in Sections A.1. and A.2., and the operational restrictions in Sections B.1 through B.5 and in the reporting requirements in section D.2. of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation

160.1 lbs/day total OC emissions, fugitive and controlled

Applicable Compliance Method

Compliance shall be demonstrated based upon the record keeping specified in Section C.2.z

b. Emission Limitation

29.22 tons per year total OC emissions, fugitive and controlled

Applicable Compliance Method

Compliance shall be demonstrated based upon the record keeping specified in Section C.2.aa.

c. Emission Limitation

0.38 lbs/day particulates

Applicable Compliance Method

Compliance shall be demonstrated based upon the AP-42 particulate emission factor of 1.9 lbs of particulate/million standard cubic feet ("MSCF") multiplied by the annual natural gas usage, in standard cubic feet, and divided by the number of days the emissions unit was in operation during the year.

d. Emission Limitation

0.12 lbs/day SO<sub>2</sub>

Applicable Compliance Method

Compliance shall be demonstrated based upon the AP-42 particulate emission factor of 0.60 lb of SO<sub>2</sub>/MSCF multiplied by the annual natural gas usage, in standard cubic feet, and divided by the number of days the emissions unit was in operation during the year.

e. Emission Limitation

19.97 lbs/day NO<sub>x</sub>

Applicable Compliance Method

Compliance shall be demonstrated based upon the AP-42 particulate emission factor of 100.00 lbs of NO<sub>x</sub>/MSCF multiplied by the annual natural gas usage, in standard cubic feet, and divided by the number of days the emissions unit was in operation during the year.

f. Emission Limitation

16.77 lbs/day CO

Applicable Compliance Method

Compliance shall be demonstrated based upon the AP-42 particulate emission factor of 84.00 lbs of CO/MSCF multiplied by the annual natural gas usage, in standard cubic feet, and divided by the number of days the emissions unit was in operation during the year.

g. Emission Limitation

This emissions unit will incorporate the use of a thermal oxidizer with a destruction efficiency of at least 92%.

Applicable Compliance Method

Compliance shall be demonstrated based upon the stack testing procedure required in Section E.2.d.

h. Emission Limitation

**Banta Publications Greenfield**  
**PTI Application: 05 11208**  
**Issued**

**Facility ID: 0536010011**

**Emissions Unit ID: R006**

5% opacity as a 6-minute average

#### Applicable Compliance Method

Compliance shall be determined using visible emission evaluations performed in accordance with the procedures specified in USEPA Reference Method 9 (40 CFR Part 60, Appendix A).

i. Emission Limitation

109.0 lbs/hr maximum average ink usage rate  
2616.0 lbs/day maximum daily average ink usage rate

#### Applicable Compliance Method

Compliance shall be demonstrated based upon the record keeping specified in Sections C.2.k. and C.2.l.

j. Emission Limitation

32.4 gallons per day maximum average fountain solution usage rate  
11,826 gallons per year maximum fountain solution usage

#### Applicable Compliance Method

Compliance shall be demonstrated based upon the record keeping specified in Sections C.2.m. and C.2.c.

k. Emission Limitation

15.03 gallons per day maximum average OC cleanup material usage  
5487 gallons per year maximum OC cleanup material usage

#### Applicable Compliance Method

Compliance shall be demonstrated based upon the record keeping specified in Sections C.2.n. and C.2.d.

l. Emission Limitation

3.38 lbs OC/hr (controlled, from the thermal oxidizer)

Applicable Compliance Method

Compliance shall be demonstrated based upon the record keeping specified in Section C.2.x.

m. Emission Limitation

The OC content of ink employed in this emissions unit shall not exceed 45% by weight. The OC content of fountain solution employed in this emissions unit shall not exceed 1.97 pounds per gallon. The OC content of the cleanup material employed in this emissions unit shall not exceed 7.2 pounds per gallon.

Applicable Compliance Method

Compliance shall be demonstrated based upon manufacturer formulation data or USEPA Method 24 testing.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. the emissions testing shall be conducted within 60 days of reaching maximum production.
  - b. the emissions testing shall be conducted to demonstrate compliance with the destruction efficiency limitation for organic compounds.
  - c. the tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
  - d. the destruction efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with Method 25 or 25A of 40 CFR Part 60, Appendix A, and the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
3. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to

Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

**F. Miscellaneous Requirements**

None

**NEW SOURCE REVIEW FORM B**

PTI Number: 05-11308 Facility ID: 0536010011

FACILITY NAME Banta Publications Greenfield

FACILITY DESCRIPTION 9 unit web offset lithographic heatset printing press with regenerative thermal oxidizer CITY/TWP Greenfield

SIC CODE 2752 SCC CODE 4-05-004-12 EMISSIONS UNIT ID R006

EMISSIONS UNIT DESCRIPTION 9 unit web heatset lithographic printing press (HWOPL)

DATE INSTALLED April, 2001

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	attainment	0.08 lb/day	0.01	0.08 lb/day	0.01
PM <sub>10</sub>	attainment				
Sulfur Dioxide	attainment	0.12 lb/day	0.53	0.01 lb/day	0.53
Organic Compounds	attainment	160.1 lb/day	29.22	160.0 lb/day	29.22
Nitrogen Oxides	attainment	19.97 lb/day	3.64	19.97 lb/day	3.64
Carbon Monoxide	attainment	16.77 lb/day	3.06	16.77 lb/day	3.06
Lead					
Other: Air Toxics					

## APPLICABLE FEDERAL RULES:

NSPS? No

NESHAP? No

PSD? No

OFFSET POLICY? NO

## WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

**Enter Determination** Compliance with Ohio Administrative Code (OAC) rule 3745-31-05 shall be demonstrated by compliance with the air toxics policy, the applicable OAC rules and the mass emissions limitations, and compliance with the terms and conditions of this permit.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$219,000.00

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? \_\_\_\_\_ YES \_\_\_\_\_ NO

IDENTIFY THE AIR CONTAMINANTS: \_\_\_\_\_

**NEW SOURCE REVIEW FORM B**

PTI Number: 05-11308

Facility ID: 0536010011

FACILITY NAME Banta Publications Greenfield

FACILITY DESCRIPTION	9 unit web offset lithographic heatset printing press with regenerative thermal oxidizer	CITY/TWP	Greenfield
----------------------	--	----------	------------

**Ohio EPA Permit to Install Information Form** Please describe below any documentation which is being submitted with this recommendation (must be sent the same day). Electronic items should be submitted with the e-mail transmitting the PTI terms, and in software that CO can utilize. If mailing any hard copy, this section must be printed as a cover page. All items must be clearly labeled indicating the PTI name and number. Submit **hard copy items to Pam McGraner**, AQM&P, DAPC, Central Office, and electronic files to [airpti@epa.state.oh.us](mailto:airpti@epa.state.oh.us)

*Please fill out the following. If the checkbox does not work, replace it with an 'X'*

	<u>Electronic</u>	<u>Additional information File Name Convention (your PTI # plus this letter)</u>	<u>Hard Copy</u>	<u>None</u>
<u>Calculations (required)</u>	<input type="checkbox"/>	000000c.wpd	<input checked="" type="checkbox"/>	
<u>Modeling form/results</u>	<input type="checkbox"/>	000000s.wpd	<input type="checkbox"/>	<input type="checkbox"/>
<u>PTI Application (complete or partial)*</u>	<input type="checkbox"/>	000000a.wpd	<input type="checkbox"/>	<input type="checkbox"/>
<u>BAT Study</u>	<input type="checkbox"/>	000000b.wpd	<input type="checkbox"/>	<input type="checkbox"/>
<u>Other/misc.</u>	<input type="checkbox"/>	000000t.wpd	<input type="checkbox"/>	<input type="checkbox"/>

\* Mandatory for netting, PSD, nonattainment NSR, 112(g), 21-07(G)(9)(g) and 21-09(U)(2)(f) - 2 complete copies.

Please complete (see comment bubble to the left for additional instructions):

NSR Discussion

This permit is for a 9 unit web offset lithographic heatset printing press. The permit was processed using Engineering Guide #56. Best available technology for the emissions unit is the use of a thermal incinerator with a destruction efficiency of 92%. The source will be tested to verify that it meets the 92%DE. In lieu of capture efficiency testing, USEPA recognizes the use of emission factors for calculating VOC emissions from a heatset web offset lithographic printing press. Those factors can be found in the draft CTG (Sept., 1993) and ACT (June, 1994) and are presented in Eng. Guide #56, page 18, section 21.

Please complete for these type permits (For PSD/NSR Permit, place mouse over this text):

Synthetic Minor Determination and/or  Netting Determination  
Permit To Install ENTER PTI NUMBER HERE

A. Source Description

B. Facility Emissions and Attainment Status

C. Source Emissions

D. Conclusion

**PLEASE PROVIDE ADDITIONAL NOTES OR COMMENTS AS NECESSARY:**

**NEW SOURCE REVIEW FORM B**

PTI Number: 05-11308

Facility ID: 0536010011

FACILITY NAME Banta Publications Greenfield

FACILITY DESCRIPTION	9 unit web offset lithographic heatset printing press with regenerative thermal oxidizer	CITY/TWP	Greenfield
----------------------	--	----------	------------

NONE

Please complete:

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

OC

29.22