

Facility ID: 0575010205 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

- [Go to Part II for Emissions Unit R002](#)
- [Go to Part II for Emissions Unit R005](#)
- [Go to Part II for Emissions Unit R006](#)
- [Go to Part II for Emissions Unit R007](#)

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Facility ID: 0575010205 Emissions Unit ID: R002 Issuance type: Final State Permit To Operate

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**Part II - Special Terms and Conditions**

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
  - (a) None.

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

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
offset/heatset web press, with a common catalytic incinerator (for emissions units R002 and R006)	OAC rule 3745-31-05 (PTI 05-5447)	156.8 pounds per day ("lbs/day") organic compounds ("OC"), including any fugitive emissions  28.6 tons per year ("tpy") OC, including any fugitive emissions  Natural gas combustion emissions shall not exceed the following for the catalytic incinerator serving emissions units R002 and R006: 0.14 lbs/day particulates 0.012 lbs/day SO2 1.90 lbs/day NOx 1.60 lbs/day CO  This emissions unit shall incorporate the use of a catalytic incinerator with a destruction efficiency of at least 90%.
	OAC rule 3745-21-07(G)(2) OAC rule 3745-21-07(G)(6) OAC rule 3745-17-11 OAC rule 3745-17-07	See 2.a through 2.e below. See 2.f below. See 2.f below. See 2.f below.  Visible particulate emissions coming from the incinerator stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

**2. Additional Terms and Conditions**

- (a) Emissions from natural gas combustion in the dryer are exempt from regulation per OAC rule 3745-31-03(A)(1)(c).  
The OC content of the inks employed in this emissions unit shall not exceed 40%, by weight.  
The OC content of the dampening solution employed in this emissions unit shall not exceed 1.33 pounds per gallon.  
The OC content of the organic cleanup material employed in this emissions unit shall not exceed 6.68 pounds per gallon.  
The combined OC emissions from emissions units R002 and R006 shall not exceed 10.0 pounds per hour (controlled, from the incinerator for both emissions units' dryer ovens).  
The emissions 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 catalytic incinerator.

- a. The average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 650 degrees Fahrenheit.
  - b. The average temperature difference across the catalyst bed, for any 3-hour block of time when the emissions unit is in operation at maximum operating conditions, shall not be less than 229 degrees Fahrenheit.
2. The dryer oven and catalytic incinerator for this emissions unit shall only employ natural gas as fuel.
  3. The maximum ink usage in this emissions unit shall not exceed 103.3 pounds per hour and 2,479.2 lbs/day.
  4. The maximum dampening solution usage in this emissions unit shall not exceed 12 gallons per day and 4,380 gallons per year.
  5. The maximum organic cleanup material usage in this emissions unit shall not exceed 8 gallons per day and 2,920 gallons per year.
- C. Monitoring and/or Record Keeping Requirements**
1. The permittee shall operate and maintain continuous temperature monitors and record the temperature immediately upstream and downstream of the incinerator's catalyst bed when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording device shall be capable of accurately measuring the desired parameter. The temperature monitors 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:
    - i. the total amount of each ink employed by this emissions unit, in pounds (monthly and year-to-date ("YTD"));
    - ii. the total amount of each dampening solution employed by this emissions unit, in gallons (monthly and YTD);
    - iii. the total amount of each cleanup material employed by this emissions unit, in gallons (monthly and YTD);
    - i. the OC content of each ink employed by this emissions unit, in percent by weight;
    - ii. the OC content of each dampening solution employed by this emissions unit, in pounds per gallon;
    - iii. the OC content of each cleanup material employed by this emissions unit, in pounds per gallon;
    - the total number of hours the emissions unit was in operation;
    - the total number of days the emissions unit was in operation;
    - i. 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.i (monthly);
    - ii. the average amount of all inks employed by this emissions unit, in pounds per hour, i.e., 2.f.i (monthly) /2.d;
    - iii. the average amount of all inks employed by this emissions unit, in lbs/day, i.e., 2.f.i (monthly)/2.e;
    - the average amount of all dampening solution employed by this emissions unit, in gallons per day, i.e., the sum of all the dampening solutions listed in 2.b.ii (monthly)/2.e;
    - the average amount of all cleanup material employed by this emissions unit, in gallons per day, i.e., the sum of all cleanup materials listed in 2.b.iii (monthly)/2.e;
    - i. 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.i (monthly) multiplied by its associated OC content listed in 2.c.i, multiplied by (0.8)\*;
    - ii. the uncontrolled OC emission rate from the dryer oven for all dampening solutions, in pounds, i.e., the sum of the amount of each dampening solution listed in 2.b.ii (monthly) multiplied by its associated OC content listed in 2.c.ii, multiplied by (0.7)\*;
    - iii. the total uncontrolled OC emission rate from the dryer oven, in pounds, i.e., (2.i.i+2.i.ii);
    - iv. the uncontrolled average OC emission rate from the dryer oven, in lbs/day, i.e., (2.i.iii/2.e);
    - i. the total fugitive OC emission rate for all dampening solutions, in pounds, i.e., the sum of the amount of each dampening solution listed in 2.b.ii (monthly) multiplied by its associated OC content listed in 2.c.ii, multiplied by (0.3)\*;
    - ii. the total fugitive OC emission rate for all cleanup materials, in pounds, i.e., the sum of the amount of each cleanup materials listed in 2.b.iii (monthly) multiplied by its associated OC content listed in 2.c.iii, multiplied by (0.5)\*;
    - iii. the total fugitive OC emission rate, in pounds, i.e., (2.j.i+2.j.ii);
    - iv. the total fugitive OC emission rate, in lbs/day, i.e., (2.j.iii/2e);
    - i. the total OC emissions from the incinerator, in pounds, i.e., 2.i.iii x (1 - 0.943)\*\*;
    - ii. the total average OC emissions from the incinerator, in pounds per hour, i.e., (2.k.i/2.d);
    - iii. the total average OC emissions from the incinerator, in lbs/day, i.e., (2.k.i/2.e);
    - i. the total average OC emissions (fugitive and controlled), in lbs/day, i.e., (2.j.iv+2.k.iii);
    - ii. the total OC emissions (fugitive and controlled), in tons YTD, i.e., the sum of (2.j.iii+2.k.i) for each past month of the calendar year/2000 lbs/ton;
    - a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation;
    - i. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was less than 650 degrees Fahrenheit; and

- ii. all 3-hour blocks of time (when the emissions unit was in operation at maximum productivity) during which the average temperature difference across the catalyst bed was less than 229 degrees Fahrenheit; and the average combined controlled OC emissions from emissions units R006 and R002, in pounds per hour, i.e., the sum of 2.k.ii from this emissions unit and 2.k.ii from emissions unit R006.

\* 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 catalytic incinerator. 30 percent of the dampening solution emissions is fugitive, and 70 percent is vented to the catalytic incinerator. 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 10mm Hg or lower at 20 degrees Celsius (68 deg. F.).

\*\* A destruction efficiency of 94.3 % was determined by the most recent performance test at the time of permit issuance. The decimal equivalent to the latest destruction efficiency testing required in Section E.3 of this permit will be used in place of the 0.943 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:
  - ii. the use of ink(s) with greater than 40% ,by weight, OC content;
  - iii. the use of dampening solution(s) with greater than 1.33 pounds per gallon OC content ;
  - iv. the use of cleanup material(s) with greater than 6.68 pounds per gallon of OC content;
  - v. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was less than 650 degrees Fahrenheit;
  - vi. all 3-hour blocks of time (when the emissions unit was in operation at maximum productivity) during which the average temperature difference across the catalyst bed was less than 229 degrees Fahrenheit; and
2. The permittee shall notify Ohio EPA Southwest District Office in writing of each monthly record showing any exceedances of the following:
  - i. 156.8 lbs/day total average OC emissions;
  - ii 10.0 lbs/hr total average OC emissions from the combined catalytic incinerator; and
  - iii. 12 gallons per day of dampening solution, 8 gallons per day of organic cleanup material, and/or 103.3 pounds per hour or 2479.2 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 dampening 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 of these terms and conditions shall be determined in accordance with the following methods:
 

Emission Limitation:

156.8 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.I.i.

Emission Limitation:

28.6 tons per year total OC emissions, fugitive and controlled

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping specified in Sections C.2.I.ii.

Emission Limitation:

0.14 lbs/day particulates

Applicable Compliance Method:

Compliance shall be demonstrated based upon the AP-42 particulate emission factor of 1.9 lbs of particulates/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 operational during the year.

Emission Limitation:

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

Applicable Compliance Method:

Compliance shall be demonstrated based upon the AP-42 SO<sub>2</sub> emission factor of 0.60 lbs 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 operational during the year.

Emission Limitation:

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

Applicable Compliance Method:

Compliance shall be demonstrated based upon the AP-42 NO<sub>x</sub> 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 operational during the year.

Emission Limitation:

1.60 lbs/day CO

Applicable Compliance Method:

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

Emission Limitation:

This emissions unit will incorporate the use of a catalytic incinerator with a destruction efficiency of at least 90%.

Applicable Compliance Method:

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

Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

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

Emission Limitation:

103.3 lbs/hr maximum average ink usage rate  
2479.2 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.f.ii and C.2.f.iii.

Emission Limitation:

12 gallons per day maximum average dampening solution usage rate  
4380 gallons per year maximum dampening solution usage

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping specified in Sections C.2.g and C.2.b.ii.

Emission Limitation:

8 gallons per day maximum average OC cleanup material usage  
2920 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.h and C.2.b.iii.

Emission Limitation:

10.0 lbs OC/hr combined for R002 and R006 (controlled, from the common catalytic incinerator)

Applicable Compliance Method:

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

Emission Limitation:

The OC content of ink employed in this emissions unit shall not exceed 40% by weight.  
The OC content of the dampening solution employed in this emissions unit shall not exceed 1.33 pounds per gallon.  
The OC content of the cleanup material employed in this emissions unit shall not exceed 6.68 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 6 months prior to permit renewal.
  - 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), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

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**

- 1. None

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Facility ID: 0575010205 Emissions Unit ID: R005 Issuance type: Final State Permit To Operate

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**Part II - Special Terms and Conditions**

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

- 1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (a) None.
- 2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
  - (a) None.

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

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
offset/non-heatset half web printing press	OAC rule 3745-31-05 (PTI 05-7522)	8 pounds per hour ("lbs/hr") of organic compounds ("OC")  40 pounds per day ("lbs/day") of OC
	OAC rule 3745-21-07(G)(2)	7.3 tons per year ("tpy") of OC See 2.a below.

**2. Additional Terms and Conditions**

- (a) The emission limitations required by this applicable rule are equal to the emission limitations established by best available technology under OAC rule 3745-31-05.

**B. Operational Restrictions**

- 1. Ink usage shall not exceed 35 lbs/hr, 650 lbs/day, and 237,250 pounds per year.

2. The OC content of the inks employed in this emissions unit shall not exceed 14.4% by weight.
3. The maximum dampening solution OC emissions shall not exceed 6.32 lbs/day and 1.15 tpy.
4. The OC emissions from the cleanup materials employed in this emissions unit shall not exceed 29 lbs/day and 5.3 tpy.

**C. Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information each day for this emissions unit:
  - i. the company identification for each ink, dampening solution and cleanup material employed;
  - ii. the amount of each ink employed by this emissions unit, in pounds;
  - iii. the amount of each dampening solution employed by this emissions unit, in gallons;
  - iv. the amount of each cleanup material employed by this emissions unit, in gallons;
  - v. the OC content of each ink employed by this emissions unit, in percent by weight;
  - vi. the OC content of each dampening solution employed by this emissions unit, in pounds per gallon;
  - vii. the OC content of each cleanup material employed by this emissions unit, in pounds per gallon;
  - viii. the number of hours the emissions unit was in operation;
  - ix. the total amount of inks employed by this emissions unit, in lbs/day, i.e., the sum of the amounts of all inks listed in 1.b.i;
  - x. the average amount of all inks employed by this emissions unit, in lbs/hr, i.e., 1.e.i / 1.d;
  - xi. the OC emission rate for all inks, in lbs/day, i.e., the sum of the amounts of each ink listed in 1.b.i multiplied by its associated OC content listed in 1.c.i, multiplied by (0.05)\*;
  - xii. the OC emission rate for all dampening solutions, in lbs/day, i.e., the sum of the amounts of each dampening solution listed in 1.b.ii multiplied by its associated OC content listed in 1.c.ii;
  - xiii. the OC emission rate for all cleaning materials, in lbs/day, i.e., the sum of the amounts of each cleanup material listed in 1.b.iii (daily) multiplied by its associated OC content listed in 1.c.iii, multiplied by (0.50)\*;
  - xiv. the total OC emission rate, in lbs/day, from all inks, dampening solutions, and cleanup materials, i.e., the sum of 1.f.i + 1.f.ii + 1.f.iii; and
  - xv. the average hourly OC emission rate, in lbs/hr, for this emissions unit, i.e., 1.f.iv/1.d.

\*Per DAPC guidance, the following assumptions will be used in calculating the OC emissions for this emissions unit: 95 percent (by weight) of the solvent in the inks is retained in the web. The remaining 5 percent (by weight) of the OCs in the inks is emitted. 100 percent of the OCs in the dampening solution are emitted. 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 10mm Hg or lower at 20 degrees Celsius (68 deg. F.).

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. an identification of each day during which the average hourly OC emissions from the inks, dampening solutions, and cleanup materials exceeded 8 lbs/hr, and the actual average hourly OC emissions for each such day;
  - b. an identification of each day during which the organic compound emissions from the inks, dampening solutions, and cleanup materials exceeded 40 lbs/day, and the actual organic compound emissions for each such day;
  - c. an identification of each day during which the ink usage rate exceeds 650 lbs/day, or the average hourly ink usage exceeds 35 lbs, and the actual ink usage during that time frame;
  - d. an identification of each day during which the OC content of any ink employed is greater than 14.4 % by weight, and the actual OC content of the ink on each such day;
  - e. an identification of each day during which the OC emissions attributed to dampening solution are greater than 6.32 lbs/day, and the actual OC emissions attributed to dampening solution on each such day; and/or
  - f. an identification of each day during which the OC emissions attributed to cleanup materials are greater than 29 lbs/day, and the actual OC emissions attributed to cleanup materials on each such day.
2. The permittee shall submit in writing, annual reports to Ohio EPA's SWDO which specify the following for the previous calendar year:
  - a. the total OC emissions from this emissions unit, in tons;
  - b. the OC emissions for all dampening solutions, in tons;
  - c. the OC emissions for all cleanup materials, in tons; and
  - d. the total ink usage, in pounds.

Each report shall be submitted by January 31 of each year and shall cover the previous calendar year.

**E. Testing Requirements**

1. Compliance with the allowable emission limitations in Section A.1 and the operational restrictions in Sections B.1

through B.4 of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation:

35 lbs/hr maximum ink usage  
650 lbs/day maximum ink usage  
237,250 pounds per year maximum ink usage

Applicable Compliance Method:

Compliance with the hourly maximum ink usage limitation shall be demonstrated by dividing the daily ink usage as recorded in Section C.1.b.i by the number of hours the emissions unit was in operation for the same day, as recorded in Section C.1.d.

Compliance with the daily maximum ink usage limitation shall be demonstrated based upon the record keeping specified in Section C.1.b.i.

Compliance with the yearly maximum ink usage limitation shall be demonstrated by summing the daily ink usage rates as recorded in Section C.1.b.i for each day of the previous calendar year.

Emission Limitation:

6.32 lbs/day maximum dampening solution OC emissions  
1.15 tpy maximum dampening solution OC emissions

Applicable Compliance Method:

Compliance with the daily OC emission limitation for dampening solution shall be demonstrated based upon the record keeping specified in Section C.1.f.ii.

Compliance with the tpy OC emission limitation for dampening solution shall be demonstrated by summing the daily total OC emissions as recorded in Section C.1.f.ii for each day of the calendar year and dividing by 2000 lbs/ton.

Emission Limitation:

29 lbs/day maximum cleanup material OC emissions  
5.3 tpy maximum cleanup material OC emissions

Applicable Compliance Method:

Compliance with the daily OC emission limitation for cleanup material shall be demonstrated based upon the record keeping specified in Section C.1.f.iii.

Compliance with the tpy OC emission limitation for cleanup material shall be demonstrated by summing the daily total OC emissions as recorded in Section C.1.f.iii for each day of the calendar year, and dividing by 2000 lbs/ton.

Emission Limitation:

8 lbs/hr maximum combined OC emissions  
40 lbs/day maximum combined OC emissions  
7.3 tpy maximum combined OC emissions

Applicable Compliance Method:

Compliance with the hourly OC emission limitation shall be demonstrated based on record keeping specified in Section C.1.f.v.

Compliance with the daily OC emission limitation shall be demonstrated based on record keeping specified in Section C.1.f.iv.

Compliance with the tpy OC emission limitation shall be demonstrated by summing the daily total OC emissions as recorded in Section C.1.f.iv for each day of the calendar year, and dividing by 2000 lbs/ton.

Emission Limitation:

The OC content of ink employed in this emissions unit shall not exceed 14.4% by weight.

Applicable Compliance Method:

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

**F. Miscellaneous Requirements**

1. None

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Facility ID: 0575010205 Emissions Unit ID: R006 Issuance type: Final State Permit To Operate

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**Part II - Special Terms and Conditions**

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

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
offset/heatset web press, with a common catalytic incinerator (for emissions units R002 and R006)	OAC rule 3745-31-05 (PTI 05-5447)	208.5 pounds per day ("lbs/day") organic compounds ("OC"), including any fugitive emissions  38.1 tons per year ("tpy") OC, including any fugitive emissions  Natural gas combustion emissions shall not exceed the following for the catalytic incinerator serving emissions units R002 and R006: 0.14 lbs/day particulates 0.012 lbs/day SO2 1.90 lbs/day NOx 1.60 lbs/day CO  This emissions unit shall incorporate the use of a catalytic incinerator with a destruction efficiency of at least 90%.  See 2.a through 2.e below. See 2.f below. See 2.f below. See 2.f below. Visible particulate emissions coming from the incinerator stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-21-07(G)(2) OAC rule 3745-21-07(G)(6) OAC rule 3745-17-11 OAC rule 3745-17-07	

**2. Additional Terms and Conditions**

- (a) Emissions from natural gas combustion in the dryer are exempt from regulation per OAC rule 3745-31-03(A)(1)(c).  
The OC content of the inks employed in this emissions unit shall not exceed 40%, by weight.  
The OC content of the dampening solution employed in this emissions unit shall not exceed 1.96 pounds per gallon.  
The OC content of the organic cleanup material employed in this emissions unit shall not exceed 6.68 pounds per gallon.  
The combined OC emissions from emissions units R002 and R006 shall not exceed 10.0 pounds per hour (controlled, from the incinerator for both emissions units' dryer ovens).  
The emissions 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 catalytic incinerator.
  - a. The average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 650 degrees Fahrenheit.
  - b. The average temperature difference across the catalyst bed, for any 3-hour block of time when the emissions unit is in operation at maximum operating conditions, shall not be less than 229 degrees Fahrenheit.
2. The dryer oven and catalytic incinerator for this emissions unit shall only employ natural gas as fuel.
3. The maximum ink usage in this emissions unit shall not exceed 160 pounds per hour and 3840 lbs/day.
4. The maximum dampening solution usage in this emissions unit shall not exceed 12 gallons per day and 4,380 gallons per year.
5. The maximum organic cleanup material usage in this emissions unit shall not exceed 8 gallons per day and 2,920 gallons per year.

**C. Monitoring and/or Record Keeping Requirements**

1. The permittee shall operate and maintain continuous temperature monitors and record the temperature immediately upstream and downstream of the incinerator's catalyst bed when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording device shall be capable of accurately

measuring the desired parameter. The temperature monitors 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:
  - the company identification for each ink, dampening solution and cleanup material employed in this emissions unit;
    - i. the total amount of each ink employed by this emissions unit, in pounds (monthly and year-to-date ("YTD"));
    - ii. the total amount of each dampening solution employed by this emissions unit, in gallons (monthly and YTD);
    - iii. the total amount of each cleanup material employed by this emissions unit, in gallons (monthly and YTD);
      - i. the OC content of each ink employed by this emissions unit, in percent by weight;
      - ii. the OC content of each dampening solution employed by this emissions unit, in pounds per gallon;
      - iii. the OC content of each cleanup material employed by this emissions unit, in pounds per gallon;
  - the total number of hours the emissions unit was in operation;
  - the total number of days the emissions unit was in operation;
  - i. 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.i (monthly);
  - ii. the average amount of all inks employed by this emissions unit, in pounds per hour, i.e., 2.f.i (monthly) /2.d;
  - iii. the average amount of all inks employed by this emissions unit, in lbs/day, i.e., 2.f.i (monthly)/2.e;
    - the average amount of all dampening solution employed by this emissions unit, in gallons per day, i.e., the sum of all the dampening solutions listed in 2.b.ii (monthly)/2.e;
    - the average amount of all cleanup material employed by this emissions unit, in gallons per day, i.e., the sum of all cleanup materials listed in 2.b.iii (monthly)/2.e;
    - i. 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.i (monthly) multiplied by its associated OC content listed in 2.c.i, multiplied by (0.8)\*;
    - ii. the uncontrolled OC emission rate from the dryer oven for all dampening solutions, in pounds, i.e., the sum of the amount of each dampening solution listed in 2.b.ii (monthly) multiplied by its associated OC content listed in 2.c.ii, multiplied by (0.7)\*;
    - iii. the total uncontrolled OC emission rate from the dryer oven, in pounds, i.e., (2.i.i+2.i.ii);
    - iv. the uncontrolled average OC emission rate from the dryer oven, in lbs/day, i.e., (2.i.iii/2.e);
      - i. the total fugitive OC emission rate for all dampening solutions, in pounds, i.e., the sum of the amount of each dampening solution listed in 2.b.ii (monthly) multiplied by its associated OC content listed in 2.c.ii, multiplied by (0.3)\*;
      - ii. the total fugitive OC emission rate for all cleanup materials, in pounds, i.e., the sum of the amount of each cleanup materials listed in 2.b.iii (monthly) multiplied by its associated OC content listed in 2.c.iii, multiplied by (0.5)\*;
      - iii. the total fugitive OC emission rate, in pounds, i.e., (2.j.i+2.j.ii);
      - iv. the total fugitive OC emission rate, in lbs/day, i.e., (2.j.iii/2e);
        - i. the total OC emissions from the incinerator, in pounds, i.e., 2.i.iii x (1 - 0.943)\*\*;
        - ii. the total average OC emissions from the incinerator, in pounds per hour, i.e., (2.k.i/2.d);
        - iii. the total average OC emissions from the incinerator, in lbs/day, i.e., (2.k.i/2.e);
          - i. the total average OC emissions (fugitive and controlled), in lbs/day, i.e., (2.j.iv+2.k.iii);
          - ii. the total OC emissions (fugitive and controlled), in tons YTD, i.e., the sum of (2.j.iii+2.k.i) for each past month of the calendar year/2000 lbs/ton;
    - a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation;
      - i. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was less than 650 degrees Fahrenheit; and
      - ii. all 3-hour blocks of time (when the emissions unit was in operation at maximum productivity) during which the average temperature difference across the catalyst bed was less than 229 degrees Fahrenheit; and the average combined controlled OC emissions from emissions units R006 and R002, in pounds per hour, i.e., the sum of 2.k.ii from this emissions unit and 2.k.ii from emissions unit R006.

\* 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 catalytic incinerator. 30 percent of the dampening solution emissions is fugitive, and 70 percent is vented to the catalytic incinerator. 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 10mm Hg or lower at 20 degrees Celsius (68 deg. F.).

\*\* A destruction efficiency of 94.3 % was determined by the most recent performance test at the time of permit issuance. The decimal equivalent to the latest destruction efficiency testing required in Section E.3 of this permit will be used in place of the 0.943 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:

- ii. the use of ink(s) with greater than 40% ,by weight, OC content;
  - iii. the use of dampening solution(s) with greater than 1.96 pounds per gallon OC content ;
  - iv. the use of cleanup material(s) with greater than 6.68 pounds per gallon of OC content;
  - v. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was less than 650 degrees Fahrenheit;
  - vi. all 3-hour blocks of time (when the emissions unit was in operation at maximum productivity) during which the average temperature difference across the catalyst bed was less than 229 degrees Fahrenheit; and
2. The permittee shall notify Ohio EPA Southwest District Office in writing of each monthly record showing any exceedances of the following:
- i. 208.5 lbs/day total average OC emissions;
  - ii 10.0 lbs/hr total average OC emissions from the combined catalytic incinerator; and
  - iii. 12 gallons per day of dampening solution, 8 gallons per day of organic cleanup material, and/or 160 pounds per hour or 3840 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 dampening 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 of these terms and conditions shall be determined in accordance with the following methods:
- Emission Limitation:
- 208.5 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.i.i.
- Emission Limitation:
- 38.1 tons per year total OC emissions, fugitive and controlled
- Applicable Compliance Method:
- Compliance shall be demonstrated based upon the record keeping specified in Sections C.2.i.ii.
- Emission Limitation:
- 0.14 lbs/day particulates
- Applicable Compliance Method:
- Compliance shall be demonstrated based upon the AP-42 particulate emission factor of 1.9 lbs of particulates/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 operational during the year.
- Emission Limitation:
- 0.012 lbs/day SO<sub>2</sub>
- Applicable Compliance Method:
- Compliance shall be demonstrated based upon the AP-42 SO<sub>2</sub> emission factor of 0.60 lbs 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 operational during the year.
- Emission Limitation:
- 1.90 lbs/day NO<sub>x</sub>
- Applicable Compliance Method:
- Compliance shall be demonstrated based upon the AP-42 NO<sub>x</sub> 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 operational during the year.
- Emission Limitation:
- 1.60 lbs/day CO

## Applicable Compliance Method:

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

Emission Limitation:

This emissions unit will incorporate the use of a catalytic incinerator with a destruction efficiency of at least 90%.

## Applicable Compliance Method:

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

Emission Limitation:

20% opacity as a 6-minute average

## Applicable Compliance Method:

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

Emission Limitation:

160 lbs/hr maximum average ink usage rate  
3840 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.f.ii and C.2.f.iii.

Emission Limitation:

12 gallons per day maximum average dampening solution usage rate  
4380 gallons per year maximum dampening solution usage

## Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping specified in Sections C.2.g and C.2.b.ii.

Emission Limitation:

8 gallons per day maximum average OC cleanup material usage  
2920 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.h and C.2.b.iii.

Emission Limitation:

10.0 lbs OC/hr combined for R002 and R006 (controlled, from the common catalytic incinerator)

## Applicable Compliance Method:

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

Emission Limitation:

The OC content of ink employed in this emissions unit shall not exceed 40% by weight.  
The OC content of the dampening solution employed in this emissions unit shall not exceed 1.96 pounds per gallon.  
The OC content of the cleanup material employed in this emissions unit shall not exceed 6.68 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 6 months prior to permit renewal.
  - 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), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

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**

- 1. None

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

Facility ID: 0575010205 Emissions Unit ID: R007 Issuance type: Final State Permit To Operate

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**Part II - Special Terms and Conditions**

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

- 1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (a) None.
- 2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
  - (a) None.

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

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
offset/non-heatset half web printing press	OAC rule 3745-31-05 (PTI 05-8142)	8 pounds per hour ("lbs/hr") of organic compounds ("OC")  40 pounds per day ("lbs/day") of OC
	OAC rule 3745-21-07(G)(2)	7.3 tons per year ("tpy") of OC See 2.a below.

- 2. **Additional Terms and Conditions**
  - (a) The emission limitations required by this applicable rule are equal to the emission limitations established by best available technology under OAC rule 3745-31-05.

**B. Operational Restrictions**

- 1. Ink usage shall not exceed 35 lbs/hr, 340 lbs/day, and 124,100 pounds per year.
- 2. The OC content of the inks employed in this emissions unit shall not exceed 21.3% by weight.
- 3. The maximum dampening solution OC emissions shall not exceed 6.3 lbs/day and 1.15 tpy.
- 4. The OC emissions from the cleanup materials employed in this emissions unit shall not exceed 26.4 lbs/day and 4.83 tpy.

**C. Monitoring and/or Record Keeping Requirements**

- 1. The permittee shall collect and record the following information each day for this emissions unit:
  - i. the company identification for each ink, dampening solution and cleanup material employed;
  - ii. the amount of each ink employed by this emissions unit, in pounds;
  - iii. the amount of each dampening solution employed by this emissions unit, in gallons;
  - iv. the amount of each cleanup material employed by this emissions unit, in gallons;
  - v. the OC content of each ink employed by this emissions unit, in percent by weight;
  - vi. the OC content of each dampening solution employed by this emissions unit, in pounds per gallon;
  - vii. the OC content of each cleanup material employed by this emissions unit, in pounds per gallon;

the number of hours the emissions unit was in operation;

- i. the total amount of inks employed by this emissions unit, in lbs/day, i.e., the sum of the amounts of all inks listed in 1.b.i;
- ii. the average amount of all inks employed by this emissions unit, in lbs/hr, i.e., 1.e.i/1.d;
- i. the OC emission rate for all inks, in lbs/day, i.e., the sum of the amounts of each ink listed in 1.b.i multiplied by its associated OC content listed in 1.c.i, multiplied by (0.05)\*;
- ii. the OC emission rate for all dampening solutions, in lbs/day, i.e., the sum of the amounts of each dampening solution listed in 1.b.ii multiplied by its associated OC content listed in 1.c.ii;
- iii. the OC emission rate for all cleaning materials, in lbs/day, i.e., the sum of the amounts of each cleanup material listed in 1.b.iii (daily) multiplied by its associated OC content listed in 1.c.iii, multiplied by (0.50)\*;
- iv. the total OC emission rate, in lbs/day, from all inks, dampening solutions, and cleanup materials, i.e., the sum of 1.f.i + 1.f.ii + 1.f.iii; and
- v. the average hourly OC emission rate, in lbs/hr, for this emissions unit, i.e., 1.f.iv/1.d.

\*Per DAPC guidance, the following assumptions will be used in calculating the OC emissions for this emissions unit: 95 percent (by weight) of the solvent in the inks is retained in the web. The remaining 5 percent (by weight) of the OCs in the inks is emitted. 100 percent of the OCs in the dampening solution are emitted. 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 10mm Hg or lower at 20 degrees Celsius (68 deg. F.).

#### D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. an identification of each day during which the average hourly OC emissions from the inks, dampening solutions, and cleanup materials exceeded 8 lbs/hr, and the actual average hourly OC emissions for each such day;
  - b. an identification of each day during which the organic compound emissions from the inks, dampening solutions, and cleanup materials exceeded 40 lbs/day, and the actual organic compound emissions for each such day;
  - c. an identification of each day during which the ink usage rate exceeds 340 lbs/day, or the average hourly ink usage exceeds 35 lbs, and the actual ink usage during that time frame;
  - d. an identification of each day during which the OC content of any ink employed is greater than 21.3 % by weight, and the actual OC content of the ink on each such day;
  - e. an identification of each day during which the OC emissions attributed to dampening solution are greater than 6.3 lbs/day, and the actual OC emissions attributed to dampening solution on each such day; and/or
  - f. an identification of each day during which the OC emissions attributed to cleanup materials are greater than 26.4 lbs/day, and the actual OC emissions attributed to cleanup materials on each such day.
2. The permittee shall submit in writing, annual reports to Ohio EPA's SWDO which specify the following for the previous calendar year:
  - a. the total OC emissions from this emissions unit, in tons;
  - b. the OC emissions for all dampening solutions, in tons;
  - c. the OC emissions for all cleanup materials, in tons; and
  - d. the total ink usage, in pounds.

Each report shall be submitted by January 31 of each year and shall cover the previous calendar year.

#### E. Testing Requirements

1. Compliance with the allowable emission limitations in Section A.1 and the operational restrictions in Sections B.1 through B.4 of these terms and conditions shall be determined in accordance with the following methods:
 

Emission Limitation:

  - 35 lbs/hr maximum ink usage
  - 340 lbs/day maximum ink usage
  - 124,100 pounds per year maximum ink usage

Applicable Compliance Method:

Compliance with the hourly maximum ink usage limitation shall be demonstrated by dividing the daily ink usage as recorded in Section C.1.b.i by the number of hours the emissions unit was in operation for the same day, as recorded in Section C.1.d.

Compliance with the daily maximum ink usage limitation shall be demonstrated based upon the record keeping specified in Section C.1.b.i.

Compliance with the yearly maximum ink usage limitation shall be demonstrated by summing the daily ink usage rates as recorded in Section C.1.b.i for each day of the previous calendar year.

Emission Limitation:

- 6.3 lbs/day maximum dampening solution OC emissions  
1.15 tpy maximum dampening solution OC emissions

Applicable Compliance Method:

Compliance with the daily OC emission limitation for dampening solution shall be demonstrated based upon the record keeping specified in Section C.1.f.ii.

Compliance with the tpy OC emission limitation for dampening solution shall be demonstrated by summing the daily total OC emissions as recorded in Section C.1.f.ii for each day of the calendar year and dividing by 2000 lbs/ton.

Emission Limitation:

- 26.4 lbs/day maximum cleanup material OC emissions  
4.83 tpy maximum cleanup material OC emissions

Applicable Compliance Method:

Compliance with the daily OC emission limitation for cleanup material shall be demonstrated based upon the record keeping specified in Section C.1.f.iii.

Compliance with the tpy OC emission limitation for cleanup material shall be demonstrated by summing the daily total OC emissions as recorded in Section C.1.f.iii for each day of the calendar year, and dividing by 2000 lbs/ton.

Emission Limitation:

- 8 lbs/hr maximum combined OC emissions  
40 lbs/day maximum combined OC emissions  
7.3 tpy maximum combined OC emissions

Applicable Compliance Method:

Compliance with the hourly OC emission limitation shall be demonstrated based on record keeping specified in Section C.1.f.v.

Compliance with the daily OC emission limitation shall be demonstrated based on record keeping specified in Section C.1.f.iv.

Compliance with the tpy OC emission limitation shall be demonstrated by summing the daily total OC emissions as recorded in Section C.1.f.iv for each day of the calendar year, and dividing by 2000 lbs/ton.

Emission Limitation:

The OC content of ink employed in this emissions unit shall not exceed 21.3% by weight.

Applicable Compliance Method:

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

F. **Miscellaneous Requirements**

1. None