



State of Ohio Environmental Protection Agency

Street Address:

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

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

Mailing Address:

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

**RE: FINAL PERMIT TO INSTALL
GREENE COUNTY
Application No: 08-4043**

CERTIFIED MAIL

| | |
|--|------------------------------|
| | TOXIC REVIEW |
| | PSD |
| | SYNTHETIC MINOR |
| | CEMS |
| | MACT |
| | NSPS |
| | NESHAPS |
| | NETTING |
| | MAJOR NON-ATTAINMENT |
| | MODELING SUBMITTED |
| | GASOLINE DISPENSING FACILITY |

DATE: August 4, 1999

Miami Valley Publishing Company
Darryll L Heck
678 Fairfield Yellow Springs Road PO Box 1679
Fairborn, OH 45324

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,
Field Operations and Permit Section
Division of Air Pollution Control

cc: USEPA
REGIONAL AIR POLLUTION CONTROL AGENCY



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install

Issue Date: August 4, 1999

Terms and Conditions

Effective Date: August 4, 1999

PERMIT TO INSTALL 08-4043

Application Number: 08-4043

APS Premise Number: 0829060354

Permit Fee: **\$200**

Name of Facility: Miami Valley Publishing Company

Person to Contact: Darryll L Heck

Address: 678 Fairfield Yellow Springs Road PO Box 1679
Fairborn, OH 45324

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

**678 Fairfield Yellow Springs Road
Fairborn, Ohio**

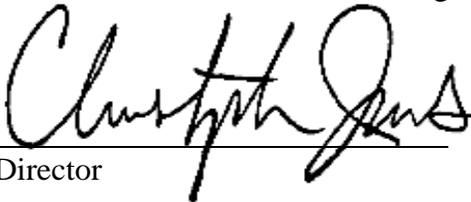
Description of proposed emissions unit(s):

HEATSET WEB OFFSET PRINTING LINE HARRIS 900 WITH CATALYTIC INCINERATOR.

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. State and Federally Enforceable Permit To Install General Terms and Conditions

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. 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.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. These quarterly written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations except malfunctions, which shall be reported in accordance with

OAC rule 3745-15-06. The written 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.) See B.14 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, recordkeeping, and reporting requirements. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. 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, i.e., upset, 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. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports submitted pursuant to OAC rule 3745-15-06 shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of deviations caused by malfunctions or upsets.

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 emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. 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 request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. 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.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

- i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
 - d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the appropriate Ohio EPA District Office or local air agency in the following manner and with the following content:
 - i. Compliance certifications shall be submitted on an annual basis unless the applicable requirement specifies more frequent submissions.
 - ii. Compliance certifications shall include the following:
 - (a) An identification of each term or condition of this permit that is the basis of the certification.
 - (b) The permittee's current compliance status.
 - (c) Whether compliance was continuous or intermittent.
 - (d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.
 - (e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
 - iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

10. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

11. Title V Permit To Operate Application

Pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit.

B. State Only Enforceable 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. 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.

14. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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.

C. Permit To Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

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

| <u>Pollutant</u> | <u>Tons Per Year</u> |
|-------------------|----------------------|
| Organic Compounds | 7.85 |

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None.

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None.

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u> |
|--|--------------------------------------|--|
| Heatset Web Offset Printing Line (HWOPL) Harris 900 with catalytic incinerator | OAC rule 3745-21-07(G) | See A.II.1. |

2. Additional Terms and Conditions

- 2.a None.

II. Operational Restrictions

- 1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

Prior to employing any photochemically reactive materials, the permittee shall provide written notification to, and obtain approval from, the Ohio EPA field office. Such notification shall include information sufficient to determine that the emissions associated with the proposed change in materials will comply with the emission limits and/or control requirements as defined in OAC 3745-21-07(G)(2). This notification, at a minimum, shall include the company identification of the new material to be employed, the solvent composition of the material, and the maximum amount to be used, in pounds per hour.

III. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall collect and record the following information each month:
 - a. the company identification of each ink, fountain solution and cleanup material employed in this emissions unit, and,
 - b. whether or not each ink, fountain solution and cleanup material employed is a photochemically reactive material.

IV. Reporting Requirements

1. The permittee shall submit deviation reports which identify the days during which photochemically reactive materials were employed in this emissions unit. Each report shall identify the cause for the use of the photochemically reactive material(s), and the estimated total quantity of material(s) emitted during each such day, in pounds. Each report shall be submitted to the Director (appropriate DO or LAA) within 30 days of the deviation.

V. Testing Requirements

1. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the inks, fountain solutions and cleanup materials.

VI. Miscellaneous Requirements

None.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u> |
|--|--------------------------------------|---|
| Heatset Web Offset Printing Line (HWOPL) Harris 900 with catalytic incinerator | OAC rule 3745-31-05 | 0.39 lb/hr and 5.22 TPY organic compounds, excluding cleanup 2.64 TPY organic compounds from cleanup minimum destruction efficiency of 95% for catalytic incineration The above tons/yr limitations are rolling, 12-month summations, as calculated in Sections B.V.1.b. & c. |

2. Additional Terms and Conditions

- 2.a The 0.39 lb OC/hour limit was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

II. Operational Restrictions

1. The dryer-related organic compound emissions from this emissions unit shall be controlled at all times through the use of a catalytic incinerator. The control efficiency of the incinerator shall reduce emissions of organic materials such that 95% or more of the carbon in the organic material is incinerated.
2. The maximum annual ink, fountain solution, and cleanup usages for this emissions unit shall not exceed 513,000 pounds, 4300 gallons, and 1600 gallons, respectively, based upon rolling, 12-month summations of the ink, fountain solution, and cleanup usage figures.

To ensure enforceability during the first 12 calendar months of operation following the issuance of

this permit, the permittee shall not exceed the ink, fountain solution, and cleanup usage levels specified in the following table:

| Month(s) | Max. Allowable Cum. Ink Usage (in pounds) | Max. Allowable Cum. Fountain Solution Usage (in gallons) | Max. Allowable Cum. Cleanup Usage (in gallons) |
|----------|---|--|--|
| 1 | 42,750.00 | 358.33 | 133.33 |
| 1-2 | 85,500.00 | 716.66 | 266.66 |
| 1-3 | 128,250.00 | 1,074.99 | 399.99 |
| 1-4 | 171,000.00 | 1,433.32 | 533.32 |
| 1-5 | 213,750.00 | 1,791.65 | 666.65 |
| 1-6 | 256,500.00 | 2,149.98 | 799.98 |
| 1-7 | 299,250.00 | 2,508.31 | 933.31 |
| 1-8 | 342,000.00 | 2,866.64 | 1,066.64 |
| 1-9 | 384,750.00 | 3,224.97 | 1,199.97 |
| 1-10 | 427,500.00 | 3,583.30 | 1,333.30 |
| 1-11 | 470,250.00 | 3,941.63 | 1,466.63 |
| 1-12 | 513,000.00 | 4,300.00 | 1,600.00 |

3. After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual usage limitations specified in Section B.II.2. shall be based upon rolling, 12-month summations of the ink, fountain solution, and cleanup usage figures.
4. 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 more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
5. The hand wash cleanup material is used to clean rollers and blankets and for other general purposes. The cleanup cloths shall be stored in closed containers.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall operate and maintain continuous temperature monitors and recorder(s) which measure and record(s) the temperature immediately upstream of the incinerator's catalyst bed 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 monitors and recorder(s) shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information each day:

- a. A log of the downtime for the control device and monitoring equipment, when the associated emissions unit was in operation.
 - b. 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 more than 50 degrees Fahrenheit below the average temperature of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance.
2. The permittee shall collect and record the following information each month for the inks and fountain solutions employed in this emissions unit:
- a. The company identification for each ink and fountain solution employed.
 - b. The amount of each ink employed (in pounds).
 - c. The number of gallons of each fountain solution employed.
 - d. The organic compound content of each ink, in percent by weight.
 - e. The organic compound content of each fountain solution, in pounds per gallon.
 - f. The total potential organic compound emission rates for all inks, in pounds, i.e., the summation of (b) X (d) for all inks.
 - g. The total potential organic compound emissions rate for all fountain solutions, in pounds, i.e., the summation of (c) X (e) for all fountain solutions.
 - h. The total controlled organic compound emission rate for all inks and fountain solutions, in pounds, per month (for calculation method refer to section B.V.1.b.).
 - i. The rolling, 12-month summation of the total controlled organic compound emissions, in pounds, beginning after the first 12 calendar months following the issuance of this permit.
3. The permittee shall collect and record the following information each month for the cleanup material employed in this emissions unit:
- a. The company identification for the cleanup material employed.
 - b. The number of gallons of cleanup material employed.
 - c. The organic compound content of the cleanup material, in pounds per gallon.
 - d. The total potential organic compound emission rate for the cleanup material, in pounds, i.e., the summation of (b) X (c) for all cleanup materials.
 - e. The total controlled organic compound emission rate for all cleanup materials, in pounds, per month (for calculation method refer to section B.V.1.c.).
 - f. The rolling, 12- month summation of the total organic compound emissions, in pounds, beginning after the first 12 calendar months following the issuance of this permit. (refer to Section B.V.1.c for calculation methodology).
4. The permittee shall maintain monthly records of the following information:
- a. The total ink (pounds), fountain solution (gallons), and cleanup (gallons) usages for each month.

- b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the total ink (pounds), fountain solution (gallons), and cleanup (gallons) usage figures.

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative ink (pounds), fountain solution (gallons), and cleanup (gallons) usage for each calendar month.

IV. Reporting Requirements

1. In accordance with paragraph B.2 of the General Terms and Conditions, the permittee shall submit deviation (excursion) reports which include the following information:
 - a. 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 more than 50 degrees Fahrenheit below the average temperature of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance.
 - b. All exceedances of the rolling 12-month usage limitations and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative ink (pounds), fountain solution (gallons), and cleanup (gallons) usages.
 - c. All exceedances of the rolling 12-month organic compound emission limitation, excluding cleanup (beginning the 13th calendar month after issuance of this permit).
 - d. All exceedances of the rolling 12-month organic compound emission limitation for cleanup (beginning the 13th calendar month after issuance of this permit).
2. The permittee also shall submit quarterly summaries which include a log of the downtime for the control device and monitoring equipment, when the associated emissions unit was in operation. These summaries shall be submitted on the same time schedule as the deviation reports.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section B.I.1 of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation-

0.39 lb/hr OC, excluding cleanup

Applicable Compliance Method-

- a. The total potential organic compound emission rate from the ink, shall be multiplied by a factor of 0.80*. The product shall then be multiplied by a factor of 1 minus the destruction efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance.
- b. The total potential organic compound emission rate from the fountain solution shall be multiplied by a factor of 0.70*. The product shall then be multiplied by a factor of 1 minus the destruction efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance.
- c. The total organic compound emission rate from the fountain solution shall then be multiplied by a factor of 0.30* to account for a 30% fugitive emission release.
- d. The hourly organic compound emission rate shall be the sum of i, ii, and iii.

b. Emission Limitation-

5.22 TPY OC, excluding cleanup, based on a rolling 12-month summation

Applicable Compliance Method-

The determination of the monthly organic compound emission rate from the inks and fountain solution shall be in accordance with the record keeping requirements as specified in Section B.III.2. and the calculation methodology specified below. After the first twelve calendar months of operation following the issuance of this permit, compliance with this annual organic compound emission limit shall be based on a rolling 12-month summation.

- i. The total potential organic compound emission rate from the inks (pounds), as required to be recorded in Section B.III.2.f., shall be multiplied by a factor of 0.80. The product shall then be multiplied by a factor of 1 minus the destruction efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance.
- ii. The total potential organic compound emission rate from the fountain solutions (pounds), as required to be recorded in Section B.III.2.g., shall be multiplied by a factor of 0.70. The product shall then be multiplied by a factor of 1 minus the destruction efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance.
- iii. The total organic compound usage rate from the fountain solutions, as required to be recorded in Section B.III.2.g., shall be multiplied by a factor of 0.30.
- iv. The total monthly organic compound emission rate, excluding cleanup, shall be the sum of the products from (i), (ii), and (iii) divided by 2000 lbs/ton.

- v. The monthly organic compound emission rates, excluding cleanup, shall then be summed, as a rolling 12-month summation.
- Per DAPC guidance, the following assumptions will be used in calculating the OC emissions for this emissions unit: 20 percent of the ink solvent is retained in the web and the remaining 80 percent is vented to the catalytic incinerator. 30 percent of the fountain solution emissions is fugitive, and 70 percent is vented to the catalytic incinerator. Until additional emission tests are conducted, the destruction efficiency of 95% shall be used in this calculation.

c. Emission Limitation-

2.64 TPY OC, cleanup, based on a rolling 12-month summation

Applicable Compliance Method-

The determination of the monthly organic compound emission rate from cleanup shall be in accordance with the record keeping requirements as specified in Section B.III.3. and the calculation methodology specified below. After the first twelve calendar months of operation following the issuance of this permit, compliance with this annual organic compound emission limit shall be based on a rolling 12-month summation.

- i. The total potential monthly organic compound usage rate from cleanup (pounds), as required to be recorded in Section B.III.3.d., shall be multiplied by a factor of 0.50 (50% fugitive emission release), and divided by 2000 lbs/ton.
 - ii. The monthly organic compound emission rates, for cleanup, shall then be summed, as a rolling 12-month summation.
 - Per DAPC guidance, the cleanup operations can assume 50% of the solvent is retained in the cloths and 50% is emitted as fugitive, if the solvent has a vapor pressure of 10 mmHg or lower at 20 degrees Celsius (68 deg F.). If the cleanup solvent does not have a vapor pressure of 10 mmHg or lower at 20 degrees Celsius (68 deg F.), then 100% of the solvent shall be counted toward fugitive emissions.
2. USEPA Method 24A shall be used to determine the VOC contents for the inks, fountain solutions and cleanup materials. If, pursuant to section 4.3 of method 24A, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24A cannot be used for a particular ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24A.
 3. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- i. The emissions testing shall be conducted approximately 12 months after permit issuance and within 6 months prior to permit renewal.
- ii. The emissions testing shall be conducted to demonstrate compliance with the destruction efficiency limitation for organic compounds and the allowable mass emission rate for OC.
- iii. The following test method shall be employed to demonstrate compliance with the destruction efficiency limitation: for OC, Method 25 or 25A of 40 CFR Part 60, Appendix A. The test method which must be employed to demonstrate compliance with the destruction efficiency limitation for OC is specified below.
- iv. 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.
- v. 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 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.

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).

VI. Miscellaneous Requirements

None.