

Facility ID: 0857041347 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 K001](#)
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- [Go to Part II for Emissions Unit K003](#)
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Facility ID: 0857041347 Emissions Unit ID: K001 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>
Five Cold Set Presses (Nos 352-14" 1 color, 353-36" 1 color, 354-36" 1 color, 362-40" 2 color)	OAC rule 3745-31-05 See F.3.	136.11 lbs OC/day, excluding cleanup; 16.84 tons OC/yr, including cleanup
	OAC rule 3745-21-07(G) See F.3.	See B.1.

2. **Additional Terms and Conditions**
  - (a) None

**B. 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.

2. The hand wash cleanup material is used to clean rollers, blankets and for other general purposes. The cleanup cloths shall be stored in closed containers.

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

1. The permittee shall collect and record the following information each day for the printing operation:
  - a. The company identification for each ink and fountain solution employed.
  - b. The number of gallons of each ink employed.
  - c. The number of gallons of each fountain solution employed.
  - d. The organic compound content of each ink employed, in pounds per gallon.
  - e. The organic compound content of each fountain solution employed, in pounds per gallon.
  - f. The total potential organic compound emission rate for all inks, in pounds, i.e., the sum of (b) x (d).
  - g. The total potential organic compound emission rate for all the fountain solutions, in pounds, i.e., the sum of (c) x (e).
  - h. The actual organic compound emission rate, in pounds, as calculated in section E.1.a.

2. The permittee shall collect and record the following information each month for the purpose of determining annual organic compound emissions:
  - a. The name and identification for each cleanup material employed.
  - b. The number of gallons of each cleanup material employed.
  - c. The organic compound content of each cleanup material employed, in pounds per gallon.
  - d. The total potential organic compound emission rate for all cleanup materials, in pounds, i.e., the sum of (b) x (c).
  - e. The actual organic compound emission rate, in pounds, as calculated in section E.1.b.ii.

3. The actual annual organic compound emission rate, including cleanup, in tons, as calculated in E.1.b.

4. The permittee shall collect and record each month whether or not each ink and fountain solution is a photochemically reactive material.

**D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify all days during which the daily organic compound emission rate from the inks and fountain solutions exceeded 136.11 pounds per day, and the actual organic compound emission rate for each such day.

The quarterly deviation (excursion) reports shall be submitted in accordance with paragraph (3) of the General Terms and Conditions.

2. 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.

3. The permittee shall submit annual reports which specify the total organic compound emissions from 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 emission limitation(s) in Section B.1 of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitation-  
136.11 lbs OC/day excluding cleanup

Applicable Compliance Method-

- i. The total potential organic compound emission rate for the inks (pounds), as required to be recorded in section C.1.f, shall be multiplied by a factor of 0.05.
- ii. The total potential organic compound emission rate for the fountain solutions (pounds), as required to be recorded in section C.1.g., shall be multiplied by a factor of 1.0, 100% fugitive emission release.
- iii. The total daily organic compound emission rate, excluding cleanup, shall then be the sum of the results from (i) and (ii).

\* Per DAPC guidance, the following assumptions will be used in calculating the OC emissions for this emissions unit: 95% of the ink solvent is retained in the web and 5% is emitted. All fountain solution OC is emitted.

Emission Limitation-  
16.84 tons OC/yr including cleanup

Applicable Compliance Method-

- i. The daily organic compound emission rates (pounds) excluding cleanup, as determined in section E.1.a above, shall be summed for the calendar year.
- ii. The total potential organic compound emission rate from the cleanup material (pounds), as required to be recorded in section C.2.d. and summed for the calendar year, shall be multiplied by a factor of 0.50, i.e., a 50 % fugitive emission release.
- iii. The total annual organic compound emission rate, including cleanup, shall then be the sum of the results from (i) and (ii), divided by 2,000 pounds per ton.

\* 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 10mm Hg or lower at 20 degrees Celsius (68 deg. F.). If the solvent has a vapor pressure greater than 10mm Hg at 20 degrees Celsius (68 deg. F.), then the above guidance does not apply.

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

**F. Miscellaneous Requirements**

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

2. The permittee shall comply with any applicable State and federal requirements governing the storage, treatment, transport and disposal of any waste generated by the operation of this emissions unit.

3. The following terms and conditions shall supersede all the air pollution control requirements for this emissions unit contained in permit to install # 08-1510, as issued on September 7, 1989: Part II A., C.1, C.2, F.1 and F.2.

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Facility ID: 0857041347 Emissions Unit ID: K002 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>
Six color sheetfed lithographic printing press (cold set), Press 369	OAC rule 3745-31-05 See F.3.	136.11 lbs OC/day, excluding cleanup; 16.24 tons OC/yr, including cleanup
	OAC rule 3745-21-07(G) See F.3.	See B.1.

2. **Additional Terms and Conditions**
  - (a) None

**B. 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.

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

1. The permittee shall collect and record the following information each day for the printing operation:
  - a. The company identification for each ink and fountain solution employed.
  - b. The number of gallons of each ink employed.
  - c. The number of gallons of each fountain solution employed.
  - d. The organic compound content of each ink employed, in pounds per gallon.
  - e. The organic compound content of each fountain solution employed, in pounds per gallon.
  - f. The total potential organic compound emission rate for all inks, in pounds, i.e., the sum of (b) x (d).
  - g. The total potential organic compound emission rate for all the fountain solutions, in pounds, i.e., the sum of (c) x (e).
  - h. The actual organic compound emission rate, in pounds, as calculated in section E.1.a.
2. The permittee shall collect and record each month for the purpose of determining annual organic compound emissions:
  - a. The name and identification for each cleanup material employed.
  - b. The number of gallons of each cleanup material employed.
  - c. The organic compound content of each cleanup material employed, in pounds per gallon.
  - d. The total potential organic compound emission rate for all cleanup materials, in pounds, i.e., the sum of (b) x (c).
  - e. The actual organic compound emission rate, in pounds, as calculated in section E.1.b.ii.

3. The actual annual organic compound emission rate, including cleanup, in tons, as calculated in E.1.b.
4. The permittee shall collect and record each month whether or not each ink and fountain solution is a photochemically reactive material.

**D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify all days during which the daily organic compound emission rate from the inks and fountain solutions exceeded 136.11 pounds per day, and the actual organic compound emission rate for each such day.  
  
The quarterly deviation (excursion) reports shall be submitted in accordance with paragraph (3) of the General Terms and Conditions.
2. 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.
3. The permittee shall submit annual reports which specify the total organic compound emissions from 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 emission limitation(s) in Section B.1 of these terms and conditions shall be determined in accordance with the following method(s):  
Emission Limitation-  
136.11 lbs OC/day excluding cleanup  
  
Applicable Compliance Method-  
i. The total potential organic compound emission rate for the inks (pounds), as required to be recorded in section C.1.f, shall be multiplied by a factor of 0.05.  
ii. The total potential organic compound emission rate for the fountain solutions (pounds), as required to be recorded in section C.1.g., shall be multiplied by a factor of 1.0, 100% fugitive emission release.  
iii. The total daily organic compound emission rate, excluding cleanup, shall then be the sum of the results from (i) and (ii).  
  
\* Per DAPC guidance, the following assumptions will be used in calculating the OC emissions for this emissions unit: 95% of the ink solvent is retained in the web and 5% is emitted. All fountain solution OC is emitted.  
Emission Limitation-  
16.24 tons OC/yr including cleanup  
  
Applicable Compliance Method-  
i. The daily organic compound emission rates (pounds) excluding cleanup, as determined in section E.1.a above, shall be summed for the calendar year.  
ii. The total potential organic compound emission rate from the cleanup material (pounds), as required to be recorded in section C.2.d. and summed for the calendar year, shall be multiplied by a factor of 1.0, i.e., an 100 % fugitive emission release.  
iii. The total annual organic compound emission rate, including cleanup, shall then be the sum of the results from (i) and (ii), divided by 2,000 pounds per ton.  
  
\* All cleanup material (automatic blanket wash) OC is emitted.
2. Formulation data or USEPA Method 24A shall be used to determine the organic compound contents of the inks, fountain solutions and cleanup materials.

**F. Miscellaneous Requirements**

1. The permittee is hereby notified that this permit, and all agency records concerning the operation of this permitted emissions unit are subject to public disclosure in accordance with OAC rule 3745-49-03.
2. The permittee shall comply with any applicable State and federal requirements governing the storage, treatment, transport and disposal of any waste generated by the operation of this emissions unit.
3. The following terms and conditions shall supersede all the air pollution control requirements for this emissions unit contained in permit to install modification # 08-1971, as issued on September 2, 1992: Part II A, B.1, C.1, C.2, D.1, D.2, D.3, F.1 and F.2.

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Facility ID: 0857041347 Emissions Unit ID: K003 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>
Six color sheetfed lithographic printing presses (cold set), Press 367.	OAC rule 3745-31-05 See F.3.	160.11 lbs OC/day, excluding cleanup; 15.01 tons OC/yr, including cleanup
	OAC rule 3745-21-07(G) See F.3.	See B.1.

**2. Additional Terms and Conditions**

- (a) None

**B. 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.

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

- 1. The permittee shall collect and record the following information each day for the printing operation:
  - a. The company identification for each ink and fountain solution employed.
  - b. The number of gallons of each ink employed.
  - c. The number of gallons of each fountain solution employed.
  - d. The organic compound content of each ink employed, in pounds per gallon.
  - e. The organic compound content of each fountain solution employed, in pounds per gallon.
  - f. The total potential organic compound emission rate for all inks, in pounds, i.e., the sum of (b) x (d).
  - g. The total potential organic compound emission rate for all the fountain solutions, in pounds, i.e., the sum of (c) x (e).
  - h. The actual organic compound emission rate, in pounds, as calculated in section E.1.a.
- 2. The permittee shall collect and record each month for the purpose of determining annual organic compound emissions:
  - a. The name and identification for each cleanup material employed.
  - b. The number of gallons of each cleanup material employed.
  - c. The organic compound content of each cleanup material employed, in pounds per gallon.
  - d. The total potential organic compound emission rate for all cleanup materials, in pounds, i.e., the sum of (b) x (c).
  - e. h. The actual organic compound emission rate, in pounds, as calculated in section E.1.b.
- 3. The actual annual organic compound emission rate, including cleanup, in tons, as calculated in E.1.b.iii.
- 4. The permittee shall collect and record each month whether or not each ink and fountain solution is a photochemically reactive material.

**D. Reporting Requirements**

- 1. The permittee shall submit quarterly deviation (excursion) reports that identifies all days during which the daily organic compound emission rate from the inks and fountain solutions exceeded 160.11 pounds per day, and the actual organic compound emission rate for each such day.
 

The quarterly deviation (excursion) reports shall be submitted in accordance with paragraph (3) of the General Terms and Conditions.
- 2. 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.

3. The permittee shall submit annual reports which specify the total organic compound emissions from 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 emission limitation(s) in Section B.1 of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitation-  
160.11 lbs OC/day excluding cleanup

Applicable Compliance Method-

- i. The total potential organic compound emission rate for the inks (pounds), as required to be recorded in section C.1.f, shall be multiplied by a factor of 0.05.
- ii. The total potential organic compound emission rate for the fountain solutions (pounds), as required to be recorded in section C.1.g., shall be multiplied by a factor of 1.0, 100% fugitive emission release.
- iii. The total daily organic compound emission rate, excluding cleanup, shall then be the sum of the results from (i) and (ii).

\* Per DAPC guidance, the following assumptions will be used in calculating the OC emissions for this emissions unit: 95% of the ink solvent is retained in the web and 5% is emitted. All fountain solution OC is emitted.

Emission Limitation-  
17.23 tons OC/yr including cleanup

Applicable Compliance Method-

- i. The daily organic compound emission rates (pounds) excluding cleanup, as determined in section E.1.a above, shall be summed for the calendar year.
- ii. The total potential organic compound emission rate from the cleanup material (pounds), as required to be recorded in section C.2.d, and summed for the calendar year, shall be multiplied by a factor of 1.0, i.e., an 100 % fugitive emission release.
- iii. The total annual organic compound emission rate, including cleanup, shall then be the sum of the results from (i) and (ii), divided by 2,000 lbs/ton.

\*\* All cleanup material (automatic blanket wash) OC is emitted.

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

**F. Miscellaneous Requirements**

1. The permittee is hereby notified that this permit, and all agency records concerning the operation of this permitted emissions unit are subject to public disclosure in accordance with OAC rule 3745-49-03.
2. The permittee shall comply with any applicable State and federal requirements governing the storage, treatment, transport and disposal of any waste generated by the operation of this emissions unit.
3. The following terms and conditions shall supersede all the air pollution control requirements for this emissions unit contained in permit to install modification # 08-1971, as issued on September 2, 1992: Part II A, B.1, C.1, C.2, D.1, D.2, D.3, F.1 and F.2.

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Facility ID: 0857041347 Emissions Unit ID: P002 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>
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- |  |                                    |   |
|--|------------------------------------|---|
| Harris M-110 Harris Heat Set Offset Web Press and Dryer, Press 468; with catalytic incinerator | OAC rule 3745-31-05<br>See F.3.    | 17.68 lbs OC/day excluding cleanup;<br>5.51 tons OC/yr including cleanup<br>5% opacity, as a six-minute average |
|  | OAC rule 3745-21-07(G)<br>See F.3. | See B.1.  |
|  | OAC rule 3745-21-07(G)(6)          | See B.2.  |
|  | OAC rule 3745-17-07                | See 2.a.  |
2. **Additional Terms and Conditions**
- (a) The limit based on this rule is less stringent than the limit based on OAC rule 3745-31-05.
- B. **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.
2. The dryer-related organic compound emissions from the emission unit, P002, shall be controlled at all times through the application of a catalytic incinerator. The destruction efficiency of the incinerator shall reduce emissions of organic materials such that 90% or more of the carbon in the organic material is incinerated.
3. The temperature of the exhaust gases immediately before the catalytic incinerator, at any time when the emissions unit is in operation, shall not be less than 750 degrees Fahrenheit.
4. The hand wash cleanup material is used to clean rollers, blankets and for other general purposes. The cleanup cloths shall be stored in closed containers.
- C. **Monitoring and/or Record Keeping Requirements**
1. The permittee shall collect and record the following information each day for the printing operation:
- The company identification for each ink and fountain solution employed.
  - The number of gallons of each ink employed.
  - The number of gallons of each fountain solution employed.
  - The organic compound content of each ink employed, in pounds per gallon.
  - The organic compound content of each fountain solution employed, in pounds per gallon.
  - The total potential organic compound emission rate for all inks, in pounds, i.e., the sum of (b) x (d).
  - The total potential organic compound emission rate for all the fountain solutions, in pounds, i.e., the sum of (c) x (e).
  - The actual organic compound emission rate as calculated in section E.1.a.
2. The permittee shall collect and record each month for the purpose of determining annual organic compound emissions:
- The name and identification for each cleanup material (blanket wash and roller wash) employed.
  - The number of gallons of each cleanup material (blanket wash and roller wash) employed.
  - The organic compound content of each cleanup material (blanket wash and roller wash) employed, in pounds per gallon.
  - The total potential organic compound emission rate for all cleanup materials (blanket wash and roller wash), in pounds, i.e., sum of the (b) x (c).
  - The actual organic compound emission rate, in pounds, as calculated in section E.1.b.ii.
3. The actual annual organic compound emission rate, including cleanup, in tons, as calculated in E.1.b.
4. The permittee shall operate and maintain continuous temperature monitors which measure 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 devices shall be capable of accurately measuring the desired parameter. The temperature monitors 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:
- All times (when the emissions unit was in operation) during which the temperature of the exhaust gases immediately before the catalyst bed was less than 750 degrees Fahrenheit.
  - A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the

associated emissions unit was in operation.

5. The permittee shall collect and record each month whether or not each ink and fountain solution is a photochemically reactive material.

**D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify all times when the emissions unit was in operation during which the average temperature of the exhaust gases immediately before the catalyst bed does not comply with the temperature limitations specified above.

The permittee shall submit quarterly deviation (excursion) reports that identify all days during which the daily organic compound emissions rate from the ink and fountain solution exceeded 17.68 pounds per day, and the actual organic compound emission rate for each such day.

The quarterly deviation (excursion) reports shall be submitted in accordance with paragraph (3) of the General Terms and Conditions.

2. 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.

**E. Testing Requirements**

1. Compliance with the emission limitation(s) in Section B.1 of these terms and conditions shall be determined in accordance with the following method(s):  
Emission Limitation-  
17.68 lbs OC/day excluding cleanup

Applicable Compliance Method-

i. The total potential organic compound emission rate from the inks (pounds), as required to be recorded in section C.1.f, shall be multiplied by a factor of 0.80. The result shall then be multiplied by a factor of 1 minus the destruction efficiency of 0.90 or the 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 solution, as required to be recorded in section C.1.g., shall be multiplied by a factor of 0.70. The result shall then be multiplied by a factor of 1 minus the destruction efficiency of 0.90 or the efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance.

iii. The total organic compound emission rate from the fountain solution, as required to be recorded in section C.1.g., shall be multiplied by a factor of 0.30, i.e., a 30 % fugitive emission release.

iv. The total daily organic compound emission rate, excluding cleanup, shall then be the sum of the results from (i), (ii) and (iii).

\* 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. A destruction efficiency of 90% shall be used for the initial calculations, per the last emission test conducted on 5/16/90.

Emission Limitation-  
5.51 tons OC/yr including cleanup

Applicable Compliance Method-

i. The daily organic compound emission rate (pounds) excluding cleanup, as determined in section E.1.a above, shall be summed for the calendar year.

ii. The total potential organic compound emission rate from the cleanup material (pounds), as required to be recorded in section C.2.d. and summed for the calendar year, shall be multiplied by a factor of 0.50, 50 % fugitive emission release.

iii. The total annual organic compound emission rate, including cleanup, shall then be the sum of the results from (i) and (ii), divided by 2,000 pounds per ton.

\* 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 10mm Hg or lower at 20 degrees Celsius (68 deg. F.). If the solvent has a vapor pressure greater than 10mm Hg at 20 degrees Celsius (68 deg. F.), then the above guidance does not apply.

Control Measure-

The catalytic incinerator shall have a destruction efficiency of not less than 90%.

Applicable Compliance Method-

Compliance shall be determined by the testing requirement in section E.2.

Emission Limitation-  
5% opacity, as a 6-minute average

Applicable Compliance Method-

Compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in USEPA Reference Method 9.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

The emission testing shall be conducted 6 months prior to permit renewal.

The emission testing shall be conducted to demonstrate compliance with the destruction efficiency limitation for organic compounds.

The following test method(s) shall be employed to demonstrate compliance with the destruction efficiency limitation: "for OC, Method 25 or 25A (as appropriate) of 40 CFR Part 60, Appendix A". The test method which

must be employed to demonstrate compliance with the destruction efficiency limitation is specified below. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA. The test(s) 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.

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.

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.

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

**F. Miscellaneous Requirements**

1. The permittee is hereby notified that this permit, and all agency records concerning the operation of this permitted emissions unit are subject to public disclosure in accordance with OAC rule 3745-49-03.
2. The permittee shall comply with any applicable State and federal requirements governing the storage, treatment, transport and disposal of any waste generated by the operation of this emissions unit.
3. The following terms and conditions shall supersede all the air pollution control requirements for this emissions unit contained in permit to install modification # 08-1912, as issued on September 2, 1992: Part II A.1, B.2, C.1, C.2, D., E.2, F.1 and F.2.