

Facility ID: 1431370384 Issuance type: Title V Preliminary Proposed Permit

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 III" and before "I. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

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Facility ID: 1431370384 Issuance type: Title V Preliminary Proposed Permit

Part II - Specific Facility Terms and Conditions

a State and Federally Enforceable Section

1. The following insignificant emissions units are located at this facility:

F001 waste paper board bailing system;
F002 wood dye laser cutter;
F003 transparent box machines;
L001 non-halogenated cold cleaner;
P003 # 6 laminator;
R004 # 19 offset press; and
T002 solvent storage tank.

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, and well as any emission limitations and/or control requirements contained within the identified permit to install for the emissions unit. Insignificant emissions units listed above that are not subject to specific permit to install requirements are subject to one or more applicable requirements contained in the SIP-approved versions of OAC Chapters 3745-17, 3745-18, and 3745-21.

(Authority for term: OAC rule 3745-77-07(A)(13))

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Facility ID: 1431370384 Issuance type: Title V Preliminary Proposed Permit

b State Only Enforceable Section

1. The following insignificant emissions units located at this facility are exempt from permit requirements because they are not subject to any applicable requirements or because they meet the "de minimis" criteria established in OAC rule 3745-15-05:

B001 natural gas-fired boiler less than 10 MMBtu/hr; and
B004 natural gas-fired heater less than 10 MMBtu/hr.

- [Go to Part III for Emissions Unit K001](#)
- [Go to Part III for Emissions Unit K002](#)
- [Go to Part III for Emissions Unit R001](#)
- [Go to Part III for Emissions Unit R002](#)
- [Go to Part III for Emissions Unit R003](#)

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

Facility ID: 1431370384 Issuance type: Title V Preliminary Proposed Permit

Part III - Terms and Conditions for Emissions Units

[Go to the top of this document](#)

Facility ID: 1431370384 Emissions Unit ID: K001 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. 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>
6-color packaging rotogravure printing press with catalytic incinerator	40 CFR Part 63, Subpart KK OAC rule 3745-21-09(Y)(1)(b) 40 CFR Part 64 Compliance Assurance Monitoring (CAM)	The permittee commits to and meets the criteria to be considered an area source for Hazardous Air Pollutants (HAPs), and is subject only to the record keeping and reporting provisions in 40 CFR 63.829(d) and 40 CFR 63.830(b)(1). See Sections A.II.1, A.III.1 and A.IV.1 below. See Section A.I.2.a below. See Sections A.III.2, A.III.3, A.III.4, A.III.5, A.III.6, A.IV.2, and A.IV.3 below.

2. Additional Terms and Conditions

- a. This emissions unit shall be equipped with a capture system and associated control system which are designed and operated to achieve the following efficiencies for volatile organic compounds:
 - (a)
 - i. a capture efficiency which is at least 70 percent, by weight; and
 - ii. a control efficiency which is at least 90 percent, by weight.

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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II. Operational Restrictions

- 1. Should HAP usage for the facility exceed either:
 - a. 9.1 Mg (10 tons) per each rolling 12-month period of any single HAP at the facility, including materials used for source categories or purposes other than printing or publishing, or
 - b. 22.7 Mg (25 tons) per each rolling 12-month period of any combination of HAP at the facility, including materials used for source categories or purposes other than printing or publishing,

the permittee shall be considered in violation of its commitment for that 12-month period and shall be considered a major source of HAP beginning the first month after the end of the 12-month period in which either of the HAP-use thresholds was exceeded. As a major source of HAP, the facility would be subject to the provisions of 40 CFR 63.820(a)(1) and no longer be eligible for the exemption found in 40 CFR 63.820 (a)(2).

Within 30 days after a violation of its commitment, the permittee shall submit a report to the Hamilton County Department of Environmental Services that either demonstrates compliance with all of the MACT requirements or provides a plan and schedule for achieving compliance with all of the MACT requirements.

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart KK)

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information on a monthly basis, for the entire facility:
 - a. the name and identification number of each coating, as applied;
 - b. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;
 - c. the total combined HAP content of each coating, in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from (b));
 - d. the number of gallons of each coating employed;
 - e. the name and identification of each cleanup material employed;
 - f. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;
 - g. the total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (sum all the individual HAP contents from (f));
 - h. the number of gallons of each cleanup material employed;
 - i. the total individual HAP usage for each HAP from all coatings and cleanup materials employed, in pounds or tons (for each HAP, the sum of (b) times (d) for each coating plus the sum of (f) times (h) for each cleanup material);
 - j. the total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons (the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material);
 - k. the total individual HAP emissions for each HAP for all emissions units at the facility other than the printing lines (K001, K002, R001, R002, and R003), in tons;
 - l. the total combined HAP emissions for all emissions units at the facility other than the printing lines (K001, K002, R001, R002, and R003), in tons;
 - m. the total individual HAP emissions for each HAP for all emissions units at the facility, in tons;
 - n. the total combined HAP emissions for all emissions units at the facility, in tons;
 - o. the total individual HAP emissions for each HAP for all emissions units at the facility for the previous, rolling 12-month period, in tons; and
 - p. the total combined HAP emissions for all emissions units at the facility for the previous, rolling 12-month period, in tons.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act. This information does not have to be kept on a line-by-line basis.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart KK)

2.
 - 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 more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
 - b. The average temperature difference across the catalyst bed at maximum operating capacity, for any 3-hour block of time, shall not be less than 80 percent of the average temperature difference during the most recent performance test that demonstrated the emissions unit was in compliance.
 - c. The permittee shall operate and maintain continuous temperature monitors and recorder(s) that measure and record(s) 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 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 for the control equipment:

 - i. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit;
 - ii. 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 emission test that demonstrated the emissions unit was in compliance; and
 - iii. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance.
 - d. Whenever the monitored values for the average temperature of the exhaust gases immediately before the catalyst bed, or the average temperature difference across the catalyst bed, for any 3-hour block of

time, deviate from the range specified above, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

e. In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable ranges specified above, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the average temperature or average temperature difference of the exhaust gases, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

f. Acceptable values for the average temperature of the exhaust gases immediately before the catalyst bed and the average temperature difference across the catalyst bed are those values that fall within the ranges specified above.

g. The ranges above are effective for the duration of this permit, unless revisions are requested by the permittee and approved by the Director, and then submitted to USEPA and approved as a revision to the state implementation plan (SIP). The permittee may request revisions to the ranges above based upon information obtained during future emission tests that demonstrate compliance with the control efficiency for this emissions unit. In addition, approved revisions to the ranges will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

(Authority for term: OAC rule 3745-21-09(B)(3)(i)(iii), OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

3. The static pressure measured at the inlet plenum to the catalytic incinerator shall be maintained at +2 inches of water or less during all times this emissions unit is in operation or shall be maintained within the range established during the most recent emission test that demonstrated the emissions unit was in compliance.

The permittee shall properly operate and maintain equipment to monitor the static pressure at the inlet plenum to the catalytic incinerator while the emissions unit is in operation. Units shall be in inches of water. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturers recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee. The permittee shall record the static pressure at the inlet plenum to the catalytic incinerator on a daily basis.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

4. The CAM plan for monitoring the control efficiency of the catalytic incinerator controlling VOC emissions from this emissions unit has been developed for the monitoring of both the inlet and outlet temperatures of the catalyst bed. The CAM performance indicator, and indicator ranges, for these temperature requirements are specified in Section A.III.2. When the temperature(s) is outside of the indicator range(s) specified in Section A.III.2, corrective action (including, but not limited to, an evaluation of the catalytic incinerator) will be required.

Upon detecting an excursion of the catalytic incinerator's temperature indicator range listed in Sections A.III.2, the owner or operator shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as thorough response by the computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

5. The CAM plan for monitoring the capture efficiency of the control equipment for this emissions unit has been developed for the monitoring of the static pressure measured at the inlet plenum to the catalytic incinerator. The CAM performance indicator, and indicator range, for inlet plenum static pressure is specified in Section A.III.3. When the static pressure is outside of the indicator range specified in Section A.III.3, corrective action (including, but not limited to, an evaluation of the catalytic incinerator) will be required.

Upon detecting an excursion of the static pressure indicator range listed in Section A.III.3, the owner or operator shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as thorough response by the computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

6. If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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IV. Reporting Requirements

1. The permittee shall submit annual reports that summarize the monthly record keeping requirements specified in Sections A.III.1.i through A.III.1.p for each calendar month. These reports shall be submitted by January 31 of each year and cover the previous calendar year's operation.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart KK)

2. The permittee shall submit quarterly summaries of the following records:
 - a. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit;
 - 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 emission test that demonstrated the emissions unit was in compliance; and
 - c. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference of the bed during the most recent emission test that demonstrated the emissions unit was in compliance.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

(Authority for term: OAC rule 3745-21-09(B)(3)(m), OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

3. The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all exceedances of the rolling, 12-month, HAP usage limitations specified in Section A.II.1; and
 - b. all deviations of the static pressure range specified in Section A.III.3.

The quarterly deviation (excursion) reports shall be submitted in accordance with Part I - Section A.1.c of the General Terms and Conditions of this permit.

(Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart KK and 40 CFR Part 64)

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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V. Testing Requirements

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

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

- a. the emission testing shall be conducted within 2.5 years after the effective date of this permit and within 6 months prior to the expiration date of this permit;
- b. the emission testing shall be conducted to demonstrate compliance with the 70%, by weight, capture and 90%, by weight, control efficiency requirements;
- c. the following test method(s) shall be employed:

The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

The control efficiency shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or other approved alternative test protocol. 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;

- d. 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 Hamilton County Department of Environmental Services; and
- e. the permittee shall record the static pressure at the inlet plenum to the catalytic incinerator at 15-minute intervals during each test run.

Personnel from the Hamilton County Department of Environmental Services 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 Hamilton County Department of Environmental Services 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 Hamilton County Department of Environmental Services.

(Authority for term: OAC rule 3745-21-10 and OAC rule 3745-77-07(C)(1))

2. Compliance with the HAP usage limits in Section A.II.1 shall be demonstrated by the record keeping in Section A.III.1.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63 Subpart KK)

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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VI. Miscellaneous Requirements

1. None

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

Facility ID: 1431370384 Issuance type: Title V Preliminary Proposed Permit

[Go to the top of this document](#)

Facility ID: 1431370384 Emissions Unit ID: K001 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. 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>
6-color packaging rotogravure printing press with catalytic incinerator		
2. Additional Terms and Conditions		
1. None		

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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II. Operational Restrictions

1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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

III. Monitoring and/or Record Keeping Requirements

1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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

IV. Reporting Requirements

1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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

V. Testing Requirements

- 1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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VI. **Miscellaneous Requirements**

- 1. None

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

Facility ID: 1431370384 Issuance type: Title V Preliminary Proposed Permit

Part III - Terms and Conditions for Emissions Units

[Go to the top of this document](#)

Facility ID: 1431370384 Emissions Unit ID: K002 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **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>
7-color packaging rotogravure printing press with catalytic incinerator	40 CFR Part 63, Subpart KK	The permittee commits to and meets the criteria to be considered an area source for Hazardous Air Pollutants (HAPs), and is subject only to the record keeping and reporting provisions in 40 CFR 63.829(d) and 40 CFR 63.830(b)(1).
	OAC rule 3745-21-09(Y)(1)(b)	See Sections A.II.1, A.III.1 and A.IV.1 below.
	40 CFR Part 64	See Section A.I.2.a below.
	Compliance Assurance Monitoring (CAM)	See Sections A.III.2, A.III.3, A.III.4, A.III.5, A.III.6, A.IV.2, and A.IV.3 below.

2. **Additional Terms and Conditions**

- a. This emissions unit shall be equipped with a capture system and associated control system which are designed and operated to achieve the following efficiencies for volatile organic compounds:
 - (a)
 - i. a capture efficiency which is at least 70 percent, by weight; and
 - ii. a control efficiency which is at least 90 percent, by weight.

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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II. **Operational Restrictions**

- 1. Should HAP usage for the facility exceed either:
 - a. 9.1 Mg (10 tons) per each rolling 12-month period of any single HAP at the facility, including materials used for source categories or purposes other than printing or publishing, or
 - b. 22.7 Mg (25 tons) per each rolling 12-month period of any combination of HAP at the facility, including materials used for source categories or purposes other than printing or publishing,

the permittee shall be considered in violation of its commitment for that 12-month period and shall be considered a major source of HAP beginning the first month after the end of the 12-month period in which either of the HAP-use thresholds was exceeded. As a major source of HAP, the facility would be subject to the provisions of 40 CFR 63.820(a)(1) and no longer be eligible for the exemption found in 40 CFR 63.820(a)(2).

Within 30 days after a violation of its commitment, the permittee shall submit a report to the Hamilton County Department of Environmental Services that either demonstrates compliance with all of the MACT requirements or provides a plan and schedule for achieving compliance with all of the MACT requirements.

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart KK)

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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

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

1. The permittee shall collect and record the following information on a monthly basis, for the entire facility:
 - a. the name and identification number of each coating, as applied;
 - b. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;
 - c. the total combined HAP content of each coating, in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from (b));
 - d. the number of gallons of each coating employed;
 - e. the name and identification of each cleanup material employed;
 - f. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;
 - g. the total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (sum all the individual HAP contents from (f));
 - h. the number of gallons of each cleanup material employed;
 - i. the total individual HAP usage for each HAP from all coatings and cleanup materials employed, in pounds or tons (for each HAP, the sum of (b) times (d) for each coating plus the sum of (f) times (h) for each cleanup material);
 - j. the total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons (the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material);
 - k. the total individual HAP emissions for each HAP for all emissions units at the facility other than the printing lines (K001, K002, R001, R002, and R003), in tons;
 - l. the total combined HAP emissions for all emissions units at the facility other than the printing lines (K001, K002, R001, R002, and R003), in tons;
 - m. the total individual HAP emissions for each HAP for all emissions units at the facility, in tons;
 - n. the total combined HAP emissions for all emissions units at the facility, in tons;
 - o. the total individual HAP emissions for each HAP for all emissions units at the facility for the previous, rolling 12-month period, in tons; and
 - p. the total combined HAP emissions for all emissions units at the facility for the previous, rolling 12-month period, in tons.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act. This information does not have to be kept on a line-by-line basis.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart KK)

2. 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 more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
 - b. The average temperature difference across the catalyst bed at maximum operating capacity, for any 3-hour block of time, shall not be less than 80 percent of the average temperature difference during the most recent performance test that demonstrated the emissions unit was in compliance.
 - c. The permittee shall operate and maintain continuous temperature monitors and recorder(s) that measure and record(s) 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 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 for the control equipment:

- i. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit;
- ii. 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 emission test that demonstrated the emissions unit was in compliance; and
- iii. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance.

d. Whenever the monitored values for the average temperature of the exhaust gases immediately before the catalyst bed, or the average temperature difference across the catalyst bed, for any 3-hour block of time, deviate from the range specified above, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

e. In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable ranges specified above, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the average temperature or average temperature difference of the exhaust gases, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

f. Acceptable values for the average temperature of the exhaust gases immediately before the catalyst bed and the average temperature difference across the catalyst bed are those values that fall within the ranges specified above.

g. The ranges above are effective for the duration of this permit, unless revisions are requested by the permittee and approved by the Director, and then submitted to USEPA and approved as a revision to the state implementation plan (SIP). The permittee may request revisions to the ranges above based upon information obtained during future emission tests that demonstrate compliance with the control efficiency for this emissions unit. In addition, approved revisions to the ranges will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

(Authority for term: OAC rule 3745-21-09(B)(3)(l)(iii), OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

3. The static pressure measured at the inlet plenum to the catalytic incinerator shall be maintained at +2 inches of water or less during all times this emissions unit is in operation or shall be maintained within the range established during the most recent emission test that demonstrated the emissions unit was in compliance.

The permittee shall properly operate and maintain equipment to monitor the static pressure at the inlet plenum to the catalytic incinerator while the emissions unit is in operation. Units shall be in inches of water. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturers recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee. The permittee shall record the static pressure at the inlet plenum to the catalytic incinerator on a daily basis.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

4. The CAM plan for monitoring the control efficiency of the catalytic incinerator controlling VOC emissions from this emissions unit has been developed for the monitoring of both the inlet and outlet temperatures of the catalytic bed. The CAM performance indicator, and indicator ranges, for these temperature requirements are specified in Section A.III.2. When the temperature(s) is outside of the indicator range(s) specified in Section A.III.2, corrective action (including, but not limited to, an evaluation of the catalytic incinerator) will be required.

Upon detecting an excursion of the catalytic incinerator's temperature indicator range listed in Sections A.III.2, the owner or operator shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as thorough response by the computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

5. The CAM plan for monitoring the capture efficiency of the control equipment for this emissions unit has been developed for the monitoring of the static pressure measured at the inlet plenum to the catalytic incinerator. The CAM performance indicator, and indicator range, for inlet plenum static pressure is specified in Section A.III.3. When the static pressure is outside of the indicator range specified in Section A.III.3, corrective action (including, but not limited to, an evaluation of the catalytic incinerator) will be required.

Upon detecting an excursion of the static pressure indicator range listed in Section A.III.3, the owner or operator shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as thorough response by the computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

6. If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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IV. Reporting Requirements

1. The permittee shall submit annual reports that summarize the monthly record keeping requirements specified in Sections A.III.1.i through A.III.1.p for each calendar month. These reports shall be submitted by January 31 of each year and cover the previous calendar year's operation.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart KK)

2. The permittee shall submit quarterly summaries of the following records:
 - a. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit;
 - 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 emission test that demonstrated the emissions unit was in compliance; and
 - c. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference of the bed during the most recent emission test that demonstrated the emissions unit was in compliance.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

(Authority for term: OAC rule 3745-21-09(B)(3)(m), OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

3. The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all exceedances of the rolling, 12-month, HAP usage limitations specified in Section A.II.1; and
 - b. all deviations of the static pressure range specified in Section A.III.3.

The quarterly deviation (excursion) reports shall be submitted in accordance with Part I - Section A.1.c of the General Terms and Conditions of this permit.

(Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart KK and 40 CFR Part 64)

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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

V. Testing Requirements

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

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

- a. the emission testing shall be conducted within 2.5 years after the effective date of this permit and within 6 months prior to the expiration date of this permit;
- b. the emission testing shall be conducted to demonstrate compliance with the 70%, by weight, capture and 90%, by weight, control efficiency requirements;
- c. the following test method(s) shall be employed:

The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

The control efficiency shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or other approved alternative test protocol. 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;

d. 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 Hamilton County Department of Environmental Services; and

e. the permittee shall record the static pressure at the inlet plenum to the catalytic incinerator at 15-minute intervals during each test run.

Personnel from the Hamilton County Department of Environmental Services 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 Hamilton County Department of Environmental Services 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 Hamilton County Department of Environmental Services.

(Authority for term: OAC rule 3745-21-10 and OAC rule 3745-77-07(C)(1))

2. Compliance with the HAP usage limits in Section A.II.1 shall be demonstrated by the record keeping in Section A.III.1.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63 Subpart KK)

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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VI. **Miscellaneous Requirements**

1. None

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

Facility ID: 1431370384 Issuance type: Title V Preliminary Proposed Permit

[Go to the top of this document](#)

Facility ID: 1431370384 Emissions Unit ID: K002 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **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>
6-color packaging rotogravure printing press with catalytic incinerator		

2. **Additional Terms and Conditions**

1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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II. **Operational Restrictions**

1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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

1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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

IV. **Reporting Requirements**

1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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V. **Testing Requirements**

- 1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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VI. **Miscellaneous Requirements**

- 1. None

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

Facility ID: 1431370384 Issuance type: Title V Preliminary Proposed Permit

Part III - Terms and Conditions for Emissions Units

[Go to the top of this document](#)

Facility ID: 1431370384 Emissions Unit ID: R001 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **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>
6-color sheet fed lithographic offset printing press	OAC rule 3745-31-05(A)(3) (PTI 14-05153)	3.26 lbs organic compounds (OC)/hr excluding cleanup*, 78.24 lbs OC/day excluding cleanup*, and 12.8 TPY OC, including cleanup
		See terms A.I.2.a, A.II.1 and A.II.2.
	OAC rule 3745-21-07(G)	*The hourly and daily emission limitations outlined are based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly and/or daily records are required to demonstrate compliance with these limits. This emissions unit is prohibited from employing photochemically reactive materials. Therefore, there are no applicable emission limitations or control measures required under OAC rule 3745-21-07(G).

2. **Additional Terms and Conditions**

- a. The organic compound (OC) content, as applied, of each material employed in this emissions unit shall not exceed the following limits:

- (a)
 - Material Pounds OC/gallon, as applied
 - Inks 1.64
 - Coatings 0.4
 - Fountain Solution 8.2
(alcohol replacement)
 - Fountain Solution 1.24
(for example, Safe 700)
 - Cleanup materials 7.0
(blanket wash, roller wash, metering roller wash and miscellaneous cleaners)

(Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1))

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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

II. **Operational Restrictions**

1. The permittee shall not employ any photochemically reactive materials as defined in OAC rule 3745-21-01(C)(5) in this emissions unit.

(Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1))

2. The maximum annual usage rates for emissions unit R001 shall not exceed the following:

Material Gallons per year

Inks 13,000

Coatings 16,000

Fountain Solution 700
(alcohol replacement)

Fountain Solution 1,200
(for example, Safe 700)

Cleanup Materials 2,750
(blanket wash, roller
wash, metering
roller wash and
misc. cleaners)

(Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1))

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each month for the coating operation:
 - a. the company identification for each ink, coating, fountain solution and cleanup material (blanket wash, roller wash, metering roller wash and misc. cleanup material) employed;
 - b. the number of gallons of each ink, coating, fountain solution and cleanup material (blanket wash, roller wash, metering roller wash and misc. cleanup material) employed;
 - c. the organic compound (OC) content of each ink, coating, fountain solution and cleanup material (blanket wash, roller wash, metering roller wash and misc. cleanup material), in pounds per gallon, as applied;
 - d. a record of each liquid organic material employed in this emissions unit, indicating whether or not the liquid organic material is photochemically reactive as defined in OAC rule 3745-21-01(C)(5); and
 - e. the total OC emission rate for all inks, coatings, fountain solutions and cleanup materials (blanket wash, roller wash, metering roller wash and misc. cleanup materials), in pounds or tons.

[Note: The information must be for the materials as employed, including any thinning solvents added at the emissions unit.]

(Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1))

2. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #14-05153, issued on August 21, 2001: A.III.1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

(Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii))

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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

IV. Reporting Requirements

1. The permittee shall submit annual reports which summarize the following for this emissions unit:
 - a. The total OC emissions from the inks, coatings, fountain solutions and cleanup materials (blanket wash, roller wash, metering roller wash and misc. cleanup materials) employed in this emissions unit for the previous calendar year.
 - b. The total number of gallons of inks, coatings, fountain solutions and cleanup materials (blanket wash, roller wash, metering roller wash and misc. cleanup materials) employed in this emissions unit for the previous calendar year.

The reports shall be submitted by January 31 of each year.

(Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1))

2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any record showing the use of noncomplying inks, coatings, fountain solutions and cleanup materials (blanket wash, roller wash, metering roller wash and misc. cleanup materials) (i.e., for OC contents) in this emissions unit.

The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days following the end of the calendar month.

(Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1))

3. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit. This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of material(s) emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.

(Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1))

4. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #14-05153, issued on August 21, 2001: A.IV.1, A.IV.2, and A.IV.3. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

(Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii))

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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

V. Testing Requirements

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

- a. Emission Limitations:
 - 3.26 lbs OC/hr
 - 78.24 lbs OC/day
 - 12.8 tpy

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements specified in Section A.III.1.

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

(Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1))

- b. Compliance with the prohibition on the use of photochemically reactive materials in this emissions unit shall be based on the record keeping requirements specified in Section A.III.1.

2. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #14-05153, issued on August 21, 2001: A.V.1.a and A.V.1.b. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

(Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii))

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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

VI. Miscellaneous Requirements

1. None

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

Facility ID: 1431370384 Issuance type: Title V Preliminary Proposed Permit

[Go to the top of this document](#)

Facility ID: 1431370384 Emissions Unit ID: R001 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. 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>
6-color sheet fed lithographic offset printing press	Air Toxics Policy	See term B.III.1.

2. **Additional Terms and Conditions**

1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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

II. **Operational Restrictions**

1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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

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

1. The permit to install for this emissions unit (R001) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Ethylene Glycol

TLV (ug/m3): 100,000

Maximum Hourly Emission Rate (lbs/hr): 3.26

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 291.4

MAGLC (ug/m3): 2,381

Physical changes to or in the method of operation of the emissions unit after it's installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

- a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

- a. A description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. Documentation of it's evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. When the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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

IV. Reporting Requirements

- 1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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

V. Testing Requirements

- 1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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

VI. Miscellaneous Requirements

- 1. None

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

Facility ID: 1431370384 Issuance type: Title V Preliminary Proposed Permit

Part III - Terms and Conditions for Emissions Units

[Go to the top of this document](#)

Facility ID: 1431370384 Emissions Unit ID: R002 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. 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>
8-color sheet fed lithographic offset printing press	OAC rule 3745-31-05(A)(3) (PTI 14-05476)	5.06 lbs organic compounds (OC)/hr excluding cleanup*, 121.4 lbs OC/day excluding cleanup*, and 22.2 TPY OC, including cleanup
		See terms A.I.2.a, A.II.1 and A.II.2.
	OAC rule 3745-21-07(G)	*The hourly and daily emission limitations outlined are based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly and/or daily records are required to demonstrate compliance with these limits. This emissions unit is prohibited from employing photochemically reactive materials. Therefore, there are no applicable emission limitations or control measures required under OAC rule 3745-21-07(G).

2. Additional Terms and Conditions

- a. The organic compound (OC) content, as applied, of each material employed in this emissions unit shall not exceed the following limits:

- (a)
 - Material Pounds OC/gallon, as applied
 - Inks 1.64
 - Coatings 0.4
 - Fountain Solution 8.2 (alcohol replacement)
 - Fountain Solution 1.24 (for example, Safe 700)
 - Cleanup materials 7.0

(blanket wash, roller wash, metering
roller wash and miscellaneous cleaners)

(Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1))

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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II. Operational Restrictions

1. The permittee shall not employ any photochemically reactive materials as defined in OAC rule 3745-21-01(C)(5) in this emissions unit.

(Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1))

2. The maximum annual usage rates for emissions unit R001 shall not exceed the following:

Material Gallons per year

Inks 13,000

Coatings 24,000

Fountain Solution 1,200
(alcohol replacement)

Fountain Solution 2,000
(for example, Safe 700)

Cleanup Materials 5,300
(blanket wash, roller
wash, metering
roller wash and
misc. cleaners)

(Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1))

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each month for the coating operation:
 - a. the company identification for each ink, coating, fountain solution and cleanup material (blanket wash, roller wash, metering roller wash and misc. cleanup material) employed;
 - b. the number of gallons of each ink, coating, fountain solution and cleanup material (blanket wash, roller wash, metering roller wash and misc. cleanup material) employed;
 - c. the organic compound (OC) content of each ink, coating, fountain solution and cleanup material (blanket wash, roller wash, metering roller wash and misc. cleanup material), in pounds per gallon, as applied;
 - d. a record of each liquid organic material employed in this emissions unit, indicating whether or not the liquid organic material is photochemically reactive as defined in OAC rule 3745-21-01(C)(5); and
 - e. the total OC emission rate for all inks, coatings, fountain solutions and cleanup materials (blanket wash, roller wash, metering roller wash and misc. cleanup materials), in pounds or tons.

[Note: The information must be for the materials as employed, including any thinning solvents added at the emissions unit.]

(Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1))

2. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #14-05476, issued on September 25, 2003: A.III.1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

(Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii))

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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

IV. Reporting Requirements

1. The permittee shall submit annual reports which summarize the following for this emissions unit:
 - a. The total OC emissions from the inks, coatings, fountain solutions and cleanup materials (blanket wash, roller wash, metering roller wash and misc. cleanup materials) employed in this emissions unit for the previous calendar year.

- b. The total number of gallons of inks, coatings, fountain solutions and cleanup materials (blanket wash, roller wash, metering roller wash and misc. cleanup materials) employed in this emissions unit for the previous calendar year.
- The reports shall be submitted by January 31 of each year.
- (Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1))
2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any record showing the use of noncomplying inks, coatings, fountain solutions and cleanup materials (blanket wash, roller wash, metering roller wash and misc. cleanup materials) (i.e., for OC contents) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days following the end of the calendar month.
- (Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1))
3. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit. This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of material(s) emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.
- (Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1))
4. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #14-05476, issued on September 25, 2003: A.IV.1, A.IV.2, and A.IV.3. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.
- (Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii))

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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

V. **Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
- a. Emission Limitations:
5.06 lbs OC/hr
121.4 lbs OC/day
22.2 tpy
- Applicable Compliance Method:
Compliance shall be based on the record keeping requirements specified in Section A.III.1.
- Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings, inks, and cleanup materials.
- (Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1))
- b. Compliance with the prohibition on the use of photochemically reactive materials in this emissions unit shall be based on the record keeping requirements specified in Section A.III.1.
2. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #14-05476, issued on September 25, 2003: A.V.1.a and A.V.1.b. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.
- (Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii))

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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

VI. **Miscellaneous Requirements**

1. None

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

Facility ID: 1431370384 Issuance type: Title V Preliminary Proposed Permit

[Go to the top of this document](#)

Facility ID: 1431370384 Emissions Unit ID: R002 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. 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>
8-color sheet fed lithographic offset printing press	Air Toxics Policy	See term B.III.1.

2. Additional Terms and Conditions

- 1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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II. Operational Restrictions

- 1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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III. Monitoring and/or Record Keeping Requirements

- 1. The permit to install for this emissions unit (R002) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Ammonia

TLV (ug/m3): 17,400

Maximum Hourly Emission Rate (lbs/hr): .22

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 223

MAGLC (ug/m3): 414

Physical changes to or in the method of operation of the emissions unit after it's installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

- a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

- a. A description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. When the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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

IV. Reporting Requirements

- 1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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

V. Testing Requirements

- 1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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VI. Miscellaneous Requirements

- 1. None

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

Facility ID: 1431370384 Issuance type: Title V Preliminary Proposed Permit

Part III - Terms and Conditions for Emissions Units

[Go to the top of this document](#)

Facility ID: 1431370384 Emissions Unit ID: R003 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. 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>
8-color sheet fed lithographic offset printing press	OAC rule 3745-31-05(A)(3) (PTI 14-05769)	5.06 lbs organic compounds (OC)/hr excluding clean-up* and 22.2 TPY OC, including cleanup

See terms A.I.2.a, A.II.1 and A.II.2.

*The hourly emission limitation outlined is based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with this limit.

OAC rule 3745-21-07(G)

This emissions unit is prohibited from employing photochemically reactive materials. Therefore, there are no applicable emission limitations or control measures required under OAC rule 3745-21-07(G).

2. Additional Terms and Conditions

- a. The organic compound (OC) content, as applied, of each material employed in this emissions unit shall not exceed the following limits:
 - (a) Material Pounds OC/gallon, as applied

Inks 1.64

Coatings 0.4

Fountain Solution 8.2
(alcohol replacement)

Fountain Solution 1.24
(for example, Safe 700)

Cleanup materials 7.0
(blanket wash, roller wash, metering
roller wash and miscellaneous cleaners)

(Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1))

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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

II. Operational Restrictions

1. The permittee shall not employ any photochemically reactive materials as defined in OAC rule 3745-21-01(C)(5) in this emissions unit.

(Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1))

2. The maximum annual usage rates for emissions unit R001 shall not exceed the following:

Material Gallons per year

Inks 13,000

Coatings 24,000

Fountain Solution 1,200
(alcohol replacement)

Fountain Solution 2,000
(for example, Safe 700)

Cleanup Materials 5,300
(blanket wash, roller
wash, metering
roller wash and
misc. cleaners)

(Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1))

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each month for the coating operation:
 - a. the company identification for each ink, coating, fountain solution and cleanup material (blanket wash, roller wash, metering roller wash and misc. cleanup material) employed;
 - b. the number of gallons of each ink, coating, fountain solution and cleanup material (blanket wash, roller wash, metering roller wash and misc. cleanup material) employed;
 - c. the organic compound (OC) content of each ink, coating, fountain solution and cleanup material (blanket wash, roller wash, metering roller wash and misc. cleanup material), in pounds per gallon, as applied;
 - d. a record of each liquid organic material employed in this emissions unit, indicating whether or not the liquid organic material is photochemically reactive as defined in OAC rule 3745-21-01(C)(5); and
 - e. the total OC emission rate for all inks, coatings, fountain solutions and cleanup materials (blanket wash, roller wash, metering roller wash and misc. cleanup materials), in pounds or tons.

[Note: The information must be for the materials as employed, including any thinning solvents added at the emissions unit.]

(Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1))

2. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #14-05769, issued on October 25, 2003: A.III.1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

(Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii))

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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

IV. Reporting Requirements

1. The permittee shall submit annual reports which summarize the following for this emissions unit:
 - a. The total OC emissions from the inks, coatings, fountain solutions and cleanup materials (blanket wash, roller wash, metering roller wash and misc. cleanup materials) employed in this emissions unit for the previous calendar year.
 - b. The total number of gallons of inks, coatings, fountain solutions and cleanup materials (blanket wash, roller wash, metering roller wash and misc. cleanup materials) employed in this emissions unit for the previous calendar year.

The reports shall be submitted by January 31 of each year.

(Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1))

2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any record showing the use of noncomplying inks, coatings, fountain solutions and cleanup materials (blanket wash, roller wash, metering roller wash and misc. cleanup materials) (i.e., for OC contents) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days following the end of the calendar month.

(Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1))

3. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit. This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of material(s) emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.

(Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1))

4. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #14-05769, issued on October 25, 2003: A.IV.1, A.IV.2, and A.IV.3. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

(Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii))

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitations:
 - 5.06 lbs OC/hr
 - 22.2 tpy

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements specified in Section A.III.1.

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

(Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1))

- b. Compliance with the prohibition on the use of photochemically reactive materials in this emissions unit shall be based on the record keeping requirements specified in Section A.III.1.
2. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #14-05769, issued on October 25, 2003: A.V.1.a and A.V.1.b. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

(Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii))

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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

VI. Miscellaneous Requirements

1. None

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

Facility ID: 1431370384 Issuance type: Title V Preliminary Proposed Permit

[Go to the top of this document](#)

Facility ID: 1431370384 Emissions Unit ID: R003 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. 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>
8-color sheet fed lithographic offset printing press	Air Toxics Policy	See term B.III.1.

2. Additional Terms and Conditions

- 1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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

II. Operational Restrictions

- 1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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

III. Monitoring and/or Record Keeping Requirements

- 1. The permit to install for this emissions unit (R002) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Ammonia

TLV (ug/m3): 17,434

Maximum Hourly Emission Rate (lbs/hr): .22

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 223

MAGLC (ug/m3): 415

Physical changes to or in the method of operation of the emissions unit after it's installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

- a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow,

changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

- a. A description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. When the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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

IV. **Reporting Requirements**

1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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

V. **Testing Requirements**

1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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

VI. **Miscellaneous Requirements**

1. None