



State of Ohio Environmental Protection Agency

Street Address:

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

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

Mailing Address:

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

**RE: FINAL PERMIT TO INSTALL  
HARRISON COUNTY  
Application No: 06-07404**

**CERTIFIED MAIL**

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

**DATE: 2/19/2004**

Freeport Press Inc  
Jerry Monroe  
121 Main St.  
Freeport, OH 43973

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, Ohio 43215

Sincerely,

Michael W. Ahern, Supervisor  
Field Operations and Permit Section  
Division of Air Pollution Control

cc: USEPA

SEDO



**Permit To Install  
Terms and Conditions**

**Issue Date: 2/19/2004  
Effective Date: 2/19/2004**

**FINAL PERMIT TO INSTALL 06-07404**

Application Number: 06-07404  
APS Premise Number: 0634000058  
Permit Fee: **\$200**  
Name of Facility: Freeport Press Inc  
Person to Contact: Jerry Monroe  
Address: 121 Main St.  
Freeport, OH 43973

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**121 Main St  
Freeport, Ohio**

Description of proposed emissions unit(s):  
**Mitsubishi L750XL Offset Heatset Printing Press.**

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

## Part I - GENERAL TERMS AND CONDITIONS

### A. Permit to Install General Terms and Conditions

#### 1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

#### 2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

#### 3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

#### 4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may

be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

**5. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

**6. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

**7. Air Pollution Nuisance**

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

**8. Termination of Permit to Install**

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

**9. Construction of New Sources(s)**

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

**10. Public Disclosure**

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

**11. Applicability**

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

**12. Best Available Technology**

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

**13. Source Operation and Operating Permit Requirements After Completion of Construction**

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

**14. Construction Compliance Certification**

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and

conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

**15. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

**B. Permit to Install Summary of Allowable Emissions**

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

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

<b><u>Pollutant</u></b>	<b><u>Tons Per Year</u></b>
VOC	4.7
PE	2.4

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K004 - Mitsubishi L750XL Heatset Web Offset Printing Press vented to a catalytic incinerator	OAC rule 3745-31-05(A)(3)	Emissions of organic compounds (OC) from the incinerator stack shall not exceed 0.14 lb/hour
		Total emissions of OC shall not exceed 4.7 TPY.
		The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G)(2) and 3745-21-07(G)(6)(a).
	OAC rule 3745-21-07(G)(2)	For any day in which a photochemically reactive material is used, the permittee shall not discharge more than forty pounds of organic material into the atmosphere in any one day, nor more than eight pounds in any one hour, from this emissions unit, unless said discharge has been reduced by at least eighty-five per cent.
	OAC rule 3745-21-07(G)(6)(a)	The permittee shall control organic compound emissions by the use of a catalytic incinerator in which 90% or more of the carbon in the organic material being incinerated is oxidized to carbon dioxide.
	OAC rule 3745-17-11(A)	PE shall not exceed 0.551 lb/hr; 2.41 TPY.

OAC rule 3745-17-07(A)(1)

Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average.

**2. Additional Terms and Conditions**

**2.a** None.

**B. Operational Restrictions**

1. During any operation of this emissions unit the combustion chamber temperature of the catalytic incinerator shall be maintained not less than 50 degrees Fahrenheit below the average temperature, specified by the manufacturer or any emissions test that demonstrated that the emissions unit was in compliance.
2. The permittee shall burn only natural gas in this emissions unit.

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

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the catalytic incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
2. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
3. The permittee shall collect and record the following information each day for the purpose of determining annual OC emissions:
  - a. The name and identification number of each ink, as applied.
  - b. The OC content of each ink, in pounds per gallon (excluding water and exempt solvents), as applied.
  - c. The number of gallons (excluding water and exempt solvents) of each ink employed.

- d. The name and identification of each cleanup material employed.
- e. The OC content of each cleanup material, in pounds per gallon.
- f. The number of gallons of each cleanup material employed.
- g. The name and identification number of each fountain solution, as applied.
- h. The OC content of each fountain solution (excluding water and exempt solvents), as applied.
- i. The number of gallons (excluding water and exempt solvents) of each fountain solution employed.
- j. The total controlled OC emissions from the stack, determined by the following calculation:  $[(C.3.b. \times C.3.c. \times .8^*) \times (1-X)]^1$ , where X is the control efficiency of the catalytic incinerator (expressed as a decimal), 95% or 0.95 in the application.
- k. The total OC emissions from all coatings, clean-up materials and fountain solutions employed, in pounds or tons; calculated by the addition of all controlled stack emissions and all fugitive emissions from the clean-up and fountain solutions, using the following equation:  $C.3.j. + [(C.3.e. \times C.3.f.) \times .5^*]$  for each clean-up material and  $[(C.3.h. \times C.3.i) \times .3^*]$  for each fountain solution.
- l. The total number of hours the emissions unit was in operation.
- m. For any day in which a photochemically reactive material is used, the average hourly controlled organic compound emission rate for all coatings and photochemically reactive clean-up materials, i.e.,  $(k)/(l)$ , in pounds per hour (average).

\*Calculations developed per engineering guide #56

<sup>1</sup> total emissions from stack are negligibly effected by volume of fountain solution used. Therefore, the contribution from the fountain solution is not used as part of the calculation.

- 4. The permittee shall collect and record the following information each day:
  - a. All 3-hour blocks of time during which the average combustion temperature within the catalytic incinerator, when the emissions unit was in operation was more the 50 degrees Fahrenheit below the optimum operating temperature established during the most recent stack test demonstrating compliance.
  - b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
  - c. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of the fuel burned in this emissions unit.

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

1. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. An identification of each day during which the average hourly controlled organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly controlled organic compound emissions for each such day.
  - b. An identification of each day during which the controlled organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual controlled organic compound emissions for each such day.

Each report shall be submitted within 30 days after the deviation occurs.

2. The permittee shall submit temperature deviation (excursion) reports that identify all 3-hour blocks of time during which the average combustion temperature within the catalytic incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the optimal operating temperature established during the most recent stack test demonstrating compliance. Each report shall be submitted within 30 days after the deviation occurs.
3. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
4. The permittee shall also submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

#### **E. Testing Requirements**

1. Compliance with the emission limitation(s) in this permit shall be determined in accordance with the following method(s):
  - a. Emissions Limitation:  
Emissions of OC from the incinerator stack shall not exceed 0.14 lb/hour. The total emissions of organic compounds shall be reduced by at least 85%. The permittee shall control organic emissions by the use of an incinerator in which 90% or more of the carbon in the organic material being incinerated is oxidized to carbon dioxide.

Compliance Method:

Organic compound emissions shall be determined according to test Methods 1 - 4, and 18, 25, or 25a as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources".

- b. Emission Limitation:  
Total emissions of OC shall not exceed 4.7 TPY.

Compliance Method:

Compliance with the total annual OC emissions limitation shall be demonstrated by the recordkeeping in Section C.3.

- c. Emission Limitation:  
PE shall not exceed 0.551 lb/hr

Applicable Compliance Method:

If required, particulate emissions shall be determined according to test Methods 1 - 5, as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources".

- d. Emission Limitation:  
PE shall not exceed 2.41 TPY

Applicable Compliance Method:

The 2.41 TPY limitation was developed by multiplying the 0.551 lb/hr limitation by the maximum operating schedule of 8760 hours per year, and dividing by 2,000 pounds per ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

- e. Emission Limitation:  
Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average.

Applicable Compliance Method:

If required, visible particulate emissions shall be determined according to test Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources".

- 2. 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 6 months following the start-up of this emissions unit.

- b. The emission testing shall be conducted to demonstrate compliance with the 85% overall reduction in emissions of organic compounds, the 90% destruction efficiency of the thermal incinerator and the 0.14 lb/hr mass emission limit.
- c. The following test method(s) shall be employed to demonstrate compliance with the destruction efficiency requirement for the thermal incinerator: Method 25 or 25A of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA. The test method 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 gas.
- d. The following methods shall be employed to demonstrate compliance with the 85% reduction in emissions of organic compounds: 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 (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or an 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.
- e. 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 Ohio EPA Southeast District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Southeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA Southeast District Office 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 Ohio EPA Southeast District Office within 30 days following completion of the test(s). The permittee may request Ohio EPA approval of additional time for the submittal of the written report.

3. Compliance with the minimum operating temperature restriction for the catalytic incinerator shall be determined based on the record keeping specified in Section C.4.a.
4. Compliance with operating restriction B.2. for the catalytic incinerator shall be determined based on the record keeping specified in Section C.4.c.

**F. Miscellaneous Requirements**

1. The shop towels used during clean-up of the web shall be stored in closed containers to capture fugitive emissions of the clean-up solvent.