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

11/09/05

CERTIFIED MAIL

RE: Draft Title V Chapter 3745-77 permit

08-29-06-0354
MIAMI VALLEY PUBLISHING COMPANY
DARRYLL L. HECK
678 FAIRFIELD YELLOW SPRINGS RD.
(PO BOX 1679)
FAIRBORN, OH 45324

Dear DARRYLL L. HECK:

You are hereby notified that the Ohio Environmental Protection Agency has prepared the enclosed draft of the Title V permit for the facility referenced above. The purpose of this draft is to solicit public comments. A public notice concerning the draft will appear in the Ohio EPA Weekly Review and the major newspaper in the county where the facility is located. Comments and/or a request for a public hearing from the public and any affected parties will be accepted by RAPCA within 30 days of the date of publication in the newspaper. You will be notified in writing if a public hearing is scheduled. **In order to facilitate our review of all the comments or concerns you may have with the enclosed draft permit, please provide a hand marked-up copy of the draft permit showing the changes you think are necessary, along with any additional summary comments, by the end of the draft public comment period. The hard marked-up copy and any additional summary comments should be submitted to the Ohio EPA District Office or local air agency identified below and to this office at the following address:**

Ohio EPA, Division of Air Pollution Control
Permit Issuance and Data Management Section
Draft Title V Permit Correspondence
122 South Front Street
Columbus, Ohio 43215

A decision on processing the Title V permit will be made after consideration of written public comments and oral testimony (if a public hearing is conducted). After the comment period, you will be provided with a Preliminary Proposed Title V permit and an opportunity to comment prior to the Proposed Title V permit submittal to USEPA.

If you have any questions concerning this draft Title V permit, please contact RAPCA.

Sincerely,

Michael W. Ahern

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

cc: USEPA (electronically submitted)
File, DAPC PMU
RAPCA
Indiana
Kentucky

State of Ohio Environmental Protection Agency

DRAFT TITLE V PERMIT

Issue Date: 11/09/05	Effective Date: To be entered upon final issuance	Expiration Date: To be entered upon final issuance

This document constitutes issuance of a Title V permit for Facility ID: 08-29-06-0354 to:

MIAMI VALLEY PUBLISHING COMPANY
678 FAIRFIELD YELLOW SPRINGS RD.
(PO BOX 1679)
FAIRBORN, OH 45324

Emissions Unit ID (Company ID)/Emissions Unit Activity Description

K001 (900 A PRESS)
LITHOGRAPHIC WEB OFFSET HEATSET PRINTING PRESS (HARRIS GRAPHICS N900 - 5 UNITS)

K002 (900 B PRESS)
LITHOGRAPHIC WEB OFFSET HEATSET PRINTING PRESS (HARRIS GRAPHICS N900 - 4 UNITS)

K004 (400 C PRESS)
LITHOGRAPHIC WEB OFFSET HEATSET PRINTING PRESS (HARRIS GRAPHICS N400 - 4 UNITS)

K005 (966 A PRESS)
LITHOGRAPHIC WEB OFFSET HEATSET PRINTING PRESS (HARRIS GRAPHICS N900 III - 5 UNITS)

K009 (400 AB PRESS)
LITHOGRAPHIC WEB OFFSET HEATSET PRINTING PRESS (HARRIS GRAPHICS N400 - 8 UNITS)

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the current Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

RAPCA
117 South Main Street
Dayton, OH 45422-1280
(937) 225-4435

OHIO ENVIRONMENTAL PROTECTION AGENCY

_____
Joseph P. Koncelik
Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

1. Monitoring and Related Record Keeping and Reporting Requirements

a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Section A.III of Part III of this Title V permit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

i. The date, place (as defined in the permit), and time of sampling or measurements.

ii. The date(s) analyses were performed.

iii. The company or entity that performed the analyses.

iv. The analytical techniques or methods used.

v. The results of such analyses.

vi. The operating conditions existing at the time of sampling or measurement.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include 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.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

c. The permittee shall submit required reports in the following manner:

i. **All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:**

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year in accordance with General Term and Condition A.1.c.ii below; and each report shall cover the previous calendar quarter.

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) constitutes a violation of an emission limitation (or control requirement) and, therefore, is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with

OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any scheduled maintenance, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

ii. **Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Section A.IV of Part III of this Title V permit or, in some cases, in Part II of this Title V permit, all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:**

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this General Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this General Term and Condition.

See B.6 below if no deviations occurred during the quarter.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

iii. **All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with General Term and Condition A.1.c.ii above shall be submitted in the following manner:**

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; General Terms and Conditions: A.2, A.3, A.4, A.6.e, A.7, A.12, A.14, A.18, A.19, A.20, and A.22 of Part I of this Title V permit, as well as any deviations from the requirements in Section A.V or A.VI of Part III of this Title V permit**,** and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with General Term and Condition A.1.c.ii above shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in Part II.A of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with General Term and Condition A.1.c.ii above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.
(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

iv. Each written report shall be signed by a responsible official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."
(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

v. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

2. Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance 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). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in General Term and Condition A.1.c.i above.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Risk Management Plans

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. (“Act”); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

a. a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or

b. as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.
(Authority for term: OAC rule 3745-77-07(A)(5))

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
(Authority for term: OAC rule 3745-77-07(A)(6))

6. General Requirements

a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.10 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d. This permit does not convey any property rights of any sort, or any exclusive privilege.

e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

f. Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable upon final issuance of all applicable OAC Chapter 3745-35 operating permits and/or registrations for all subject emissions units located at the facility and:

i. the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a “major source” as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or

ii. the permittee no longer meets the definition of a “major source” as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or

iii. a combination of i. and ii. above.

The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.
(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

7. Fees
The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.
(Authority for term: OAC rule 3745-77-07(A)(8))

8. Marketable Permit Programs
No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.
(Authority for term: OAC rule 3745-77-07(A)(9))

9. Reasonably Anticipated Operating Scenarios
The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these general terms and conditions shall apply to all operating scenarios authorized in this permit.
(Authority for term: OAC rule 3745-77-07(A)(10))

10. Reopening for Cause
This Title V permit will be reopened prior to its expiration date under the following conditions:

a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b. This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c. The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d. The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

11. Federal and State Enforceability

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

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

12. Compliance Requirements

a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.

iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:

i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.

ii. Compliance certifications shall include the following:

(a) An identification of each term or condition of this permit that is the basis of the certification.

(b) The permittee's current compliance status.

(c) Whether compliance was continuous or intermittent.

(d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.

(e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

13. Permit Shield

a. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b. This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

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

14. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

15. Emergencies

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

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

16. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

a. The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.

b. The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

c. The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).

d. The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e. The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit to install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.
(Authority for term: OAC rule 3745-77-07(I))

17. Compliance Method Requirements
Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.
(This term is provided for informational purposes only.)

18. Insignificant Activities or Emissions Levels
Each IEU that has one or more applicable requirements shall comply with those applicable requirements.
(Authority for term: OAC rule 3745-77-07(A)(1))

19. Permit to Install Requirement
Prior to the “installation” or “modification” of any “air contaminant source,” as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.
(Authority for term: OAC rule 3745-77-07(A)(1))

20. 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.
(Authority for term: OAC rule 3745-77-07(A)(1))

21. Permanent Shutdown of an Emissions Unit
The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the responsible official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the responsible official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

No emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.
(Authority for term: OAC rule 3745-77-01)

22. **Title VI Provisions**

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.

b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.

c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11))

B. ***State Only Enforceable Section***

1. Reporting Requirements Related to Monitoring and Record Keeping Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or record keeping 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 (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) 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. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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 (i.e., postmarked) quarterly, 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.)

2. 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.

3. 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.

4. 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).

5. 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.

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

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation 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 (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

a. where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in General Term and Condition A.1.c.ii; or

b. where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or

c. where the company's responsible official has certified that an emissions unit has been permanently shut down.

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforceable Section

None

B. State Only Enforceable Section

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: 900 A PRESS (K001)

Activity Description: LITHOGRAPHIC WEB OFFSET HEATSET PRINTING PRESS (HARRIS GRAPHICS N900 - 5 UNITS)

A. State and Federally Enforceable Section

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
K001 - Heatset Web Offset Printing Line (HWOPL), equipped with regenerative thermal oxidizer (RTO)	OAC rule 3745-31-05(A)(3) PTI 08-04542	The organic compound (OC) emissions, excluding cleanup, shall not exceed 2.31 lbs/hr and 9.43 tons/yr (for this emissions unit). The OC emissions, from cleanup, shall not exceed 4.62 tons/yr (for this emissions unit). The RTO shall meet a minimum destruction efficiency of 97%, by weight, for OC (see A.II.2).
	OAC rule 3745-21-07(G)(2)	None, see Section A.II.1.

2. Additional Terms and Conditions

2.a The 2.31 lbs OC/hour limit was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop additional monitoring, record keeping and/or reporting requirements to ensure compliance with this limitation.

II. Operational Restrictions

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

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04542]

2. The dryer-related OC emissions from this emissions unit shall be controlled at all times through the use of a regenerative thermal oxidizer (RTO). The RTO shall reduce emissions of organic materials, such that 97%, or more, of the carbon in the organic material is incinerated.

(Emissions units K001, K002 and K004 are commonly controlled with the RTO with a destruction/reduction efficiency of 97%, by weight, for OC.)

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04542]

II. Operational Restrictions (continued)

3. The average combustion temperature within the regenerative thermal oxidizer, 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.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04542]

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

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04542]

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:

a. the company identification of each ink, fountain solution and cleanup material employed in this emissions unit; and

b. documentation on whether or not each ink, fountain solution and cleanup material employed is a photochemically reactive material.

c. documentation on whether or not the used cleanup cloths were stored in closed containers.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04542]

2. The permittee shall operate and maintain continuous temperature monitors and recorder(s) that measure and record(s) the combustion temperature within the RTO when the emission 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 calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

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

a. A log of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.

b. All 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04542]

III. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall collect and record the following information each month for the inks and fountain solutions employed in this emissions unit:

a. The company identification for each ink and fountain solution employed.

b. The amount of each ink employed (in pounds).

c. The number of gallons of each fountain solution employed.

d. The OC content of each ink, in percent by weight.

e. The OC content of each fountain solution, in pounds per gallon.

f. The total potential OC emission rate for all the inks employed, in pounds [i.e., the summation of (b x d/100) for all inks].

g. The total potential OC emission rate for all the fountain solutions employed, in pounds [i.e., the summation of © x e) for all fountain solutions].

h. The total controlled OC emission rate for all the inks and fountain solutions employed, in pounds (for the calculation method, refer to section V.1.b of this permit).

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04542]

4. The permittee shall collect and record the following information each month for the cleanup material employed in this emissions unit:

a. The company identification for each cleanup material employed.

b. The number of gallons of each cleanup material employed.

c. The OC content of each cleanup material employed, in pounds per gallon.

d. The total potential OC emission rate for all the cleanup materials employed, in pounds [i.e., the summation of (b x c) for all cleanup materials].

e. The total controlled OC emission rate for all the cleanup materials employed, in pounds (for the calculation method, refer to section V.1.c of this permit).

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04542]

IV. Reporting Requirements

1. The permittee shall submit deviation reports that identify each day during which any photochemically reactive material was employed in this emissions unit and each day during which the used cleanup cloths were not stored in closed containers. Each report shall identify the cause for the use of the photochemically reactive material(s), and the estimated total quantity of material(s) emitted during each such day, in pounds. Each report shall be submitted to the Director (RAPCA) within 30 days of the deviation.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04542]

2. The permittee shall submit quarterly deviation (excursion) reports that include an identification of all 3-hour blocks of time (when the emissions unit was in operation) during which the average combustion temperature within the RTO did not comply with the temperature limitation above.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04542]

IV. Reporting Requirements (continued)

3. The permittee also shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04542]

4. These quarterly deviation (excursion) reports shall be submitted to the RAPCA by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04542]

V. Testing Requirements

1. Compliance with the emissions limitations in section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation-
The OC emissions from this emissions unit shall not exceed 2.31 lbs/hr, excluding cleanup

Applicable Compliance Method-

The permittee shall demonstrate compliance based on the results of emission testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

Compliance with the hourly limitation may also be determined as follows:

i. The total potential OC emission rate from the ink, based upon the maximum hourly ink usage and respective maximum OC content, shall be multiplied by a factor of 0.80*. The product shall then be multiplied by a factor of 1 minus the destruction efficiency from the most recent performance test that demonstrated the emissions unit was in compliance.

ii. The total potential OC emission rate from the fountain solution, based upon the maximum hourly fountain solution usage and respective maximum OC content, shall be multiplied by a factor of 0.70*. The product shall then be multiplied by a factor of 1 minus the destruction efficiency from the most recent performance test that demonstrated the emissions unit was in compliance.

iii. The total potential fugitive OC emission rate from the fountain solution, based upon the maximum hourly fountain solution usage and respective maximum OC content, shall be multiplied by a factor of 0.30* (to account for a 30% fugitive emission release).

iv. The maximum hourly OC emission rate, in pounds, shall then be the sum of i, ii, and iii.
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[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04542]

V. Testing Requirements (continued)

1.b Emission Limitation-
The OC emissions from this emissions unit shall not exceed 9.43 tons/yr, excluding cleanup

Applicable Compliance Method-
Compliance with the limitation above shall be determined based on the record keeping requirements specified in Section A.III of this permit, and the following calculation methodology:

i. The total potential OC emission rate from the inks (in pounds), as required to be recorded in section A.III.3.f., shall be multiplied by a factor of 0.80*. The product shall then be multiplied by a factor of 1 minus the destruction efficiency from the most recent performance test that demonstrated the emissions unit was in compliance.

ii. The total potential OC emission rate from the fountain solutions (in pounds), as required to be recorded in section A.III.3.g., shall be multiplied by a factor of 0.70*. The product shall then be multiplied by a factor of 1 minus the destruction efficiency from the most recent performance test that demonstrated the emissions unit was in compliance.

iii. The total potential OC emission rate from the fountain solutions (in pounds), as required to be recorded in Section A.III.3.g., shall be multiplied by a factor of 0.30*.

iv. The total monthly OC emission rate, excluding cleanup (in tons) shall be the sum of the products from i, ii, and iii, divided by 2000 lbs/ton.

v. The annual OC emission rate, excluding cleanup (in tons) shall then be the sum of the 12 monthly OC emission rates, from 1.b.iv above, for the calendar year.

* Per DAPC guidance, the following assumptions shall be used in calculating the OC emissions for this emissions unit: 20 percent of the ink solvent is retained in the web and the remaining 80 percent is vented to the regenerative thermal incinerator. 30 percent of the fountain solution emissions is fugitive, and 70 percent is vented to the regenerative thermal oxidizer. Until additional emission tests are conducted, the destruction efficiency of 97% (most recent test results 1/10/03) shall be used in this calculation.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04542]

1.c Emission Limitations-
The OC emissions from this emissions unit shall not exceed 4.62 tons/yr, from cleanup.

Applicable Compliance Method-
Compliance with the limitation above shall be determined based on the record keeping requirements specified in Section A.III.4 of this permit, and the following calculation methodology:

i. The total monthly OC usage rate from cleanup (in pounds), as required to be recorded in section A.III.4.d., shall be multiplied by a factor of 0.50** (50% fugitive emission release), and then divided by 2000 lbs/ton.

ii. The annual OC emission rate (for cleanup, in tons) shall then be the sum of the 12 monthly OC emission rates, from V.1.c.i., for the calendar year.

** Per DAPC guidance, the cleanup operations can assume 50% of the solvent is retained in the cloths and 50% is emitted as fugitive, if the solvent has a vapor pressure of 10 mmHg or lower at 20 degrees Celsius (68 deg F). If the cleanup solvent does not have a vapor pressure of 10 mmHg or lower at 20 degrees Celsius (68 deg F), then 100% of the solvent shall be counted toward fugitive emissions.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04542]

V. Testing Requirements (continued)

1.d Operational Restriction-
The RTO shall meet a minimum OC destruction efficiency of 97%, by weight.

Applicable Compliance Method-
Compliance with the operational restriction above shall be determined based on the of emission testing conducted in accordance with the methods and procedures outlined in section A.V.3 of this permit.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04542]

2. USEPA Method 24A shall be used to determine the OC contents for the inks, fountain solutions and cleanup materials. If the permittee determines that Method 24A cannot be used for a particular ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24A.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04542]

3. Within 12 months prior to permit expiration, the permittee shall conduct, or have conducted, an emission test(s) for this emissions unit in order to demonstrate compliance with the destruction efficiency for OCs and the allowable mass emission rate for OC. The organic compounds test(s) shall be conducted in accordance with the test methods and procedures specified in Methods 25 or 25A of 40 CFR, Part 60, Appendix A. The destruction efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases. The tests shall be conducted while the emissions unit is operating at or near maximum capacity.

Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification. 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 field office's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information regarding the emissions unit operating parameters.

A comprehensive written report on the results of the emissions test(s) shall be submitted within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04542]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: 900 B PRESS (K002)

Activity Description: LITHOGRAPHIC WEB OFFSET HEATSET PRINTING PRESS (HARRIS GRAPHICS N900 - 4 UNITS)

A. State and Federally Enforceable Section

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
K002 - Heatset Web Offset Printing Line (HWOPL), equipped with regenerative thermal oxidizer (RTO)	OAC rule 3745-31-05(A)(3) PTI 08-04542	The organic compound (OC) emissions, excluding cleanup, shall not exceed 3.34 lbs/hr and 12.11 tons/yr (for this emissions unit). The OC emissions, from cleanup, shall not exceed 6.27 tons/yr (for this emissions unit). The RTO shall meet a minimum destruction efficiency of 97%, by weight, for OC (see A.II.2).
	OAC rule 3745-21-07(G)(2)	None, see Section A.II.1.

2. Additional Terms and Conditions

2.a The 3.34 lbs OC/hour limit was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop additional monitoring, record keeping and/or reporting requirements to ensure compliance with this limitation.

II. Operational Restrictions

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

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04542]

2. The dryer-related OC emissions from this emissions unit shall be controlled at all times through the use of a regenerative thermal oxidizer (RTO). The RTO shall reduce emissions of organic materials, such that 97%, or more, of the carbon in the organic material is incinerated.

(Emissions units K001, K002 and K004 are commonly controlled with the RTO with a destruction/reduction efficiency of 97%, by weight, for OC.)

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04542]

II. Operational Restrictions (continued)

3. The average combustion temperature within the regenerative thermal oxidizer, 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.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04542]

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

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04542]

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:

a. the company identification of each ink, fountain solution and cleanup material employed in this emissions unit; and

b. documentation on whether or not each ink, fountain solution and cleanup material employed is a photochemically reactive material.

c. documentation on whether or not the used cleanup cloths were stored in closed containers.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04542]

2. The permittee shall operate and maintain continuous temperature monitors and recorder(s) that measure and record(s) the combustion temperature within the RTO when the emission 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 calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

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

a. A log of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.

b. All 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04542]

III. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall collect and record the following information each month for the inks and fountain solutions employed in this emissions unit:

a. The company identification for each ink and fountain solution employed.

b. The amount of each ink employed (in pounds).

c. The number of gallons of each fountain solution employed.

d. The OC content of each ink, in percent by weight.

e. The OC content of each fountain solution, in pounds per gallon.

f. The total potential OC emission rate for all the inks employed, in pounds [i.e., the summation of (b x d/100) for all inks].

g. The total potential OC emission rate for all the fountain solutions employed, in pounds [i.e., the summation of © x e) for all fountain solutions].

h. The total controlled OC emission rate for all the inks and fountain solutions employed, in pounds (for the calculation method, refer to section V.1.b of this permit).

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04542]

4. The permittee shall collect and record the following information each month for the cleanup material employed in this emissions unit:

a. The company identification for each cleanup material employed.

b. The number of gallons of each cleanup material employed.

c. The OC content of each cleanup material employed, in pounds per gallon.

d. The total potential OC emission rate for all the cleanup materials employed, in pounds [i.e., the summation of (b x c) for all cleanup materials].

e. The total controlled OC emission rate for all the cleanup materials employed, in pounds (for the calculation method, refer to section V.1.c of this permit).

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04542]

IV. Reporting Requirements

1. The permittee shall submit deviation reports that identify each day during which any photochemically reactive material was employed in this emissions unit and each day during which the used cleanup cloths were not stored in closed containers. Each report shall identify the cause for the use of the photochemically reactive material(s), and the estimated total quantity of material(s) emitted during each such day, in pounds. Each report shall be submitted to the Director (RAPCA) within 30 days of the deviation.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04542]

2. The permittee shall submit quarterly deviation (excursion) reports that include an identification of all 3-hour blocks of time (when the emissions unit was in operation) during which the average combustion temperature within the RTO did not comply with the temperature limitation above.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04542]

IV. Reporting Requirements (continued)

3. The permittee also shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04542]

4. These quarterly deviation (excursion) reports shall be submitted to the RAPCA by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04542]

V. Testing Requirements

1. Compliance with the emissions limitations in section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation-
The OC emissions from this emissions unit shall not exceed 3.34 lbs/hr, excluding cleanup

Applicable Compliance Method-

The permittee shall demonstrate compliance based on the results of emission testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

Compliance with the hourly limitation may also be determined as follows:

i. The total potential OC emission rate from the ink, based upon the maximum hourly ink usage and respective maximum OC content, shall be multiplied by a factor of 0.80*. The product shall then be multiplied by a factor of 1 minus the destruction efficiency from the most recent performance test that demonstrated the emissions unit was in compliance.

ii. The total potential OC emission rate from the fountain solution, based upon the maximum hourly fountain solution usage and respective maximum OC content, shall be multiplied by a factor of 0.70*. The product shall then be multiplied by a factor of 1 minus the destruction efficiency from the most recent performance test that demonstrated the emissions unit was in compliance.

iii. The total potential fugitive OC emission rate from the fountain solution, based upon the maximum hourly fountain solution usage and respective maximum OC content, shall be multiplied by a factor of 0.30* (to account for a 30% fugitive emission release).

iv. The maximum hourly OC emission rate, in pounds, shall then be the sum of i, ii, and iii.
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[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04542]

V. Testing Requirements (continued)

1.b Emission Limitation-
The OC emissions from this emissions unit shall not exceed 12.11 tons/yr, excluding cleanup

Applicable Compliance Method-
Compliance with the limitation above shall be determined based on the record keeping requirements specified in Section A.III of this permit, and the following calculation methodology:

i. The total potential OC emission rate from the inks (in pounds), as required to be recorded in section A.III.3.f., shall be multiplied by a factor of 0.80*. The product shall then be multiplied by a factor of 1 minus the destruction efficiency from the most recent performance test that demonstrated the emissions unit was in compliance.

ii. The total potential OC emission rate from the fountain solutions (in pounds), as required to be recorded in section A.III.3.g., shall be multiplied by a factor of 0.70*. The product shall then be multiplied by a factor of 1 minus the destruction efficiency from the most recent performance test that demonstrated the emissions unit was in compliance.

iii. The total potential OC emission rate from the fountain solutions (in pounds), as required to be recorded in Section A.III.3.g., shall be multiplied by a factor of 0.30*.

iv. The total monthly OC emission rate, excluding cleanup (in tons) shall be the sum of the products from i, ii, and iii, divided by 2000 lbs/ton.

v. The annual OC emission rate, excluding cleanup (in tons) shall then be the sum of the 12 monthly OC emission rates, from 1.b.iv above, for the calendar year.

* Per DAPC guidance, the following assumptions shall be used in calculating the OC emissions for this emissions unit: 20 percent of the ink solvent is retained in the web and the remaining 80 percent is vented to the regenerative thermal incinerator. 30 percent of the fountain solution emissions is fugitive, and 70 percent is vented to the regenerative thermal oxidizer. Until additional emission tests are conducted, the destruction efficiency of 97% (most recent test results 1/10/03) shall be used in this calculation.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04542]

1.c Emission Limitations-
The OC emissions from this emissions unit shall not exceed 6.27 tons/yr, from cleanup.

Applicable Compliance Method-
Compliance with the limitation above shall be determined based on the record keeping requirements specified in Section A.III.4 of this permit, and the following calculation methodology:

i. The total monthly OC usage rate from cleanup (in pounds), as required to be recorded in section A.III.4.d., shall be multiplied by a factor of 0.50** (50% fugitive emission release), and then divided by 2000 lbs/ton.

ii. The annual OC emission rate (for cleanup, in tons) shall then be the sum of the 12 monthly OC emission rates, from V.1.c.i., for the calendar year.

** Per DAPC guidance, the cleanup operations can assume 50% of the solvent is retained in the cloths and 50% is emitted as fugitive, if the solvent has a vapor pressure of 10 mmHg or lower at 20 degrees Celsius (68 deg F). If the cleanup solvent does not have a vapor pressure of 10 mmHg or lower at 20 degrees Celsius (68 deg F), then 100% of the solvent shall be counted toward fugitive emissions.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04542]

V. Testing Requirements (continued)

1.d Operational Restriction-
The RTO shall meet a minimum OC destruction efficiency of 97%, by weight.

Applicable Compliance Method-
Compliance with the operational restriction above shall be determined based on the of emission testing conducted in accordance with the methods and procedures outlined in section A.V.3 of this permit.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04542]

2. USEPA Method 24A shall be used to determine the OC contents for the inks, fountain solutions and cleanup materials. If the permittee determines that Method 24A cannot be used for a particular ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24A.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04542]

3. Within 12 months prior to permit expiration, the permittee shall conduct, or have conducted, an emission test(s) for this emissions unit in order to demonstrate compliance with the destruction efficiency for OCs and the allowable mass emission rate for OC. The organic compounds test(s) shall be conducted in accordance with the test methods and procedures specified in Methods 25 or 25A of 40 CFR, Part 60, Appendix A. The destruction efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases. The tests shall be conducted while the emissions unit is operating at or near maximum capacity.

Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification. 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 field office's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information regarding the emissions unit operating parameters.

A comprehensive written report on the results of the emissions test(s) shall be submitted within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04542]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: 400 C PRESS (K004)

Activity Description: LITHOGRAPHIC WEB OFFSET HEATSET PRINTING PRESS (HARRIS GRAPHICS N400 - 4 UNITS)

A. State and Federally Enforceable Section

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
K004 - Heatset Web Offset Printing Line (HWOPL), equipped with regenerative thermal oxidizer (RTO)	OAC rule 3745-31-05(A)(3) PTI 08-04542	The organic compound (OC) emissions, excluding cleanup, shall not exceed 1.22 lbs/hr and 3.37 tons/yr (for this emissions unit). The OC emissions, from cleanup, shall not exceed 2.64 tons/yr (for this emissions unit). The RTO shall meet a minimum destruction efficiency of 97%, by weight, for OC (see A.II.2).
	OAC rule 3745-21-07(G)(2)	None, see Section A.II.1.

2. Additional Terms and Conditions

2.a The 1.22 lbs OC/hour limit was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop additional monitoring, record keeping and/or reporting requirements to ensure compliance with this limitation.

II. Operational Restrictions

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

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04542]

2. The dryer-related OC emissions from this emissions unit shall be controlled at all times through the use of a regenerative thermal oxidizer (RTO). The RTO shall reduce emissions of organic materials, such that 97%, or more, of the carbon in the organic material is incinerated.

(Emissions units K001, K002 and K004 are commonly controlled with the RTO with a destruction/reduction efficiency of 97%, by weight, for OC.)

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04542]

II. Operational Restrictions (continued)

3. The average combustion temperature within the regenerative thermal oxidizer, 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.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04542]

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

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04542]

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:

a. the company identification of each ink, fountain solution and cleanup material employed in this emissions unit; and

b. documentation on whether or not each ink, fountain solution and cleanup material employed is a photochemically reactive material.

c. documentation on whether or not the used cleanup cloths were stored in closed containers.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04542]

2. The permittee shall operate and maintain continuous temperature monitors and recorder(s) that measure and record(s) the combustion temperature within the RTO when the emission 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 calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

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

a. A log of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.

b. All 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04542]

III. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall collect and record the following information each month for the inks and fountain solutions employed in this emissions unit:

a. The company identification for each ink and fountain solution employed.

b. The amount of each ink employed (in pounds).

c. The number of gallons of each fountain solution employed.

d. The OC content of each ink, in percent by weight.

e. The OC content of each fountain solution, in pounds per gallon.

f. The total potential OC emission rate for all the inks employed, in pounds [i.e., the summation of (b x d/100) for all inks].

g. The total potential OC emission rate for all the fountain solutions employed, in pounds [i.e., the summation of © x e) for all fountain solutions].

h. The total controlled OC emission rate for all the inks and fountain solutions employed, in pounds (for the calculation method, refer to section V.1.b of this permit).

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04542]

4. The permittee shall collect and record the following information each month for the cleanup material employed in this emissions unit:

a. The company identification for each cleanup material employed.

b. The number of gallons of each cleanup material employed.

c. The OC content of each cleanup material employed, in pounds per gallon.

d. The total potential OC emission rate for all the cleanup materials employed, in pounds [i.e., the summation of (b x c) for all cleanup materials].

e. The total controlled OC emission rate for all the cleanup materials employed, in pounds (for the calculation method, refer to section V.1.c of this permit).

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04542]

IV. Reporting Requirements

1. The permittee shall submit deviation reports that identify each day during which any photochemically reactive material was employed in this emissions unit and each day during which the used cleanup cloths were not stored in closed containers. Each report shall identify the cause for the use of the photochemically reactive material(s), and the estimated total quantity of material(s) emitted during each such day, in pounds. Each report shall be submitted to the Director (RAPCA) within 30 days of the deviation.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04542]

2. The permittee shall submit quarterly deviation (excursion) reports that include an identification of all 3-hour blocks of time (when the emissions unit was in operation) during which the average combustion temperature within the RTO did not comply with the temperature limitation above.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04542]

IV. Reporting Requirements (continued)

3. The permittee also shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04542]

4. These quarterly deviation (excursion) reports shall be submitted to the RAPCA by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04542]

V. Testing Requirements

1. Compliance with the emissions limitations in section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation-
The OC emissions from this emissions unit shall not exceed 1.22 lbs/hr, excluding cleanup

Applicable Compliance Method-

The permittee shall demonstrate compliance based on the results of emission testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

Compliance with the hourly limitation may also be determined as follows:

i. The total potential OC emission rate from the ink, based upon the maximum hourly ink usage and respective maximum OC content, shall be multiplied by a factor of 0.80*. The product shall then be multiplied by a factor of 1 minus the destruction efficiency from the most recent performance test that demonstrated the emissions unit was in compliance.

ii. The total potential OC emission rate from the fountain solution, based upon the maximum hourly fountain solution usage and respective maximum OC content, shall be multiplied by a factor of 0.70*. The product shall then be multiplied by a factor of 1 minus the destruction efficiency from the most recent performance test that demonstrated the emissions unit was in compliance.

iii. The total potential fugitive OC emission rate from the fountain solution, based upon the maximum hourly fountain solution usage and respective maximum OC content, shall be multiplied by a factor of 0.30* (to account for a 30% fugitive emission release).

iv. The maximum hourly OC emission rate, in pounds, shall then be the sum of i, ii, and iii.
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[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04542]

V. Testing Requirements (continued)

1.b Emission Limitation-
The OC emissions from this emissions unit shall not exceed 3.37 tons/yr, excluding cleanup

Applicable Compliance Method-
Compliance with the limitation above shall be determined based on the record keeping requirements specified in Section A.III of this permit, and the following calculation methodology:

i. The total potential OC emission rate from the inks (in pounds), as required to be recorded in section A.III.3.f., shall be multiplied by a factor of 0.80*. The product shall then be multiplied by a factor of 1 minus the destruction efficiency from the most recent performance test that demonstrated the emissions unit was in compliance.

ii. The total potential OC emission rate from the fountain solutions (in pounds), as required to be recorded in section A.III.3.g., shall be multiplied by a factor of 0.70*. The product shall then be multiplied by a factor of 1 minus the destruction efficiency from the most recent performance test that demonstrated the emissions unit was in compliance.

iii. The total potential OC emission rate from the fountain solutions (in pounds), as required to be recorded in Section A.III.3.g., shall be multiplied by a factor of 0.30*.

iv. The total monthly OC emission rate, excluding cleanup (in tons) shall be the sum of the products from i, ii, and iii, divided by 2000 lbs/ton.

v. The annual OC emission rate, excluding cleanup (in tons) shall then be the sum of the 12 monthly OC emission rates, from 1.b.iv above, for the calendar year.

* Per DAPC guidance, the following assumptions shall be used in calculating the OC emissions for this emissions unit: 20 percent of the ink solvent is retained in the web and the remaining 80 percent is vented to the regenerative thermal incinerator. 30 percent of the fountain solution emissions is fugitive, and 70 percent is vented to the regenerative thermal oxidizer. Until additional emission tests are conducted, the destruction efficiency of 97% (most recent test results 1/10/03) shall be used in this calculation.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04542]

1.c Emission Limitations-
The OC emissions from this emissions unit shall not exceed 2.64 tons/yr, from cleanup.

Applicable Compliance Method-
Compliance with the limitation above shall be determined based on the record keeping requirements specified in Section A.III.4 of this permit, and the following calculation methodology:

i. The total monthly OC usage rate from cleanup (in pounds), as required to be recorded in section A.III.4.d., shall be multiplied by a factor of 0.50** (50% fugitive emission release), and then divided by 2000 lbs/ton.

ii. The annual OC emission rate (for cleanup, in tons) shall then be the sum of the 12 monthly OC emission rates, from V.1.c.i., for the calendar year.

** Per DAPC guidance, the cleanup operations can assume 50% of the solvent is retained in the cloths and 50% is emitted as fugitive, if the solvent has a vapor pressure of 10 mmHg or lower at 20 degrees Celsius (68 deg F). If the cleanup solvent does not have a vapor pressure of 10 mmHg or lower at 20 degrees Celsius (68 deg F), then 100% of the solvent shall be counted toward fugitive emissions.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04542]

V. Testing Requirements (continued)

1.d Operational Restriction-
The RTO shall meet a minimum OC destruction efficiency of 97%, by weight.

Applicable Compliance Method-
Compliance with the operational restriction above shall be determined based on the of emission testing conducted in accordance with the methods and procedures outlined in section A.V.3 of this permit.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04542]

2. USEPA Method 24A shall be used to determine the OC contents for the inks, fountain solutions and cleanup materials. If the permittee determines that Method 24A cannot be used for a particular ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24A.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04542]

3. Within 12 months prior to permit expiration, the permittee shall conduct, or have conducted, an emission test(s) for this emissions unit in order to demonstrate compliance with the destruction efficiency for OCs and the allowable mass emission rate for OC. The organic compounds test(s) shall be conducted in accordance with the test methods and procedures specified in Methods 25 or 25A of 40 CFR, Part 60, Appendix A. The destruction efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases. The tests shall be conducted while the emissions unit is operating at or near maximum capacity.

Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification. 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 field office's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information regarding the emissions unit operating parameters.

A comprehensive written report on the results of the emissions test(s) shall be submitted within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04542]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: 966 A PRESS (K005)

Activity Description: LITHOGRAPHIC WEB OFFSET HEATSET PRINTING PRESS (HARRIS GRAPHICS N900 III - 5 UNITS)

A. State and Federally Enforceable Section

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
K005 - Heatset Web Offset Printing Line (HWOPL), equipped with regenerative thermal oxidizer (RTO)	OAC rule 3745-31-05(A)(3) PTI 08-2674	The organic compound (OC) emissions, excluding cleanup, shall not exceed 1.07 lbs/hr and 3.94 tons/yr (for this emissions unit). The OC emissions, from cleanup, shall not exceed 4.13 tons/yr (for this emissions unit). The RTO shall meet a minimum destruction efficiency of 97%, by weight, for OC (see A.II.2).
	OAC rule 3745-21-07(G)(2)	None, see Section A.II.1.

2. Additional Terms and Conditions

2.a The 1.07 lbs OC/hour limit was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop additional monitoring, record keeping and/or reporting requirements to ensure compliance with this limitation.

II. Operational Restrictions

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

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-2674]

2. The dryer-related OC emissions from this emissions unit shall be controlled at all times through the use of a regenerative thermal oxidizer (RTO). The RTO shall reduce emissions of organic materials, such that 97%, or more, of the carbon in the organic material is incinerated.

(Emissions units K005 and K009 are commonly controlled with an RTO with a destruction/reduction efficiency of 97%, by weight, for OC.)

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-2674]

II. Operational Restrictions (continued)

3. The average combustion temperature within the regenerative thermal oxidizer, 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.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-2674]

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

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-2674]

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:

a. the company identification of each ink, fountain solution and cleanup material employed in this emissions unit; and

b. documentation on whether or not each ink, fountain solution and cleanup material employed is a photochemically reactive material.

c. documentation on whether or not the used cleanup cloths were stored in closed containers.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-2674]

2. The permittee shall operate and maintain continuous temperature monitors and recorder(s) that measure and record(s) the combustion temperature within the RTO when the emission 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 calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

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

a. A log of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.

b. All 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-2674]

III. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall collect and record the following information each month for the inks and fountain solutions employed in this emissions unit:

a. The company identification for each ink and fountain solution employed.

b. The amount of each ink employed (in pounds).

c. The number of gallons of each fountain solution employed.

d. The OC content of each ink, in percent by weight.

e. The OC content of each fountain solution, in pounds per gallon.

f. The total potential OC emission rate for all the inks employed, in pounds [i.e., the summation of (b x d/100) for all inks].

g. The total potential OC emission rate for all the fountain solutions employed, in pounds [i.e., the summation of © x e) for all fountain solutions].

h. The total controlled OC emission rate for all the inks and fountain solutions employed, in pounds (for the calculation method, refer to section V.1.b of this permit).

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-2674]

4. The permittee shall collect and record the following information each month for the cleanup material employed in this emissions unit:

a. The company identification for each cleanup material employed.

b. The number of gallons of each cleanup material employed.

c. The OC content of each cleanup material employed, in pounds per gallon.

d. The total potential OC emission rate for all the cleanup materials employed, in pounds [i.e., the summation of (b x c) for all cleanup materials].

e. The total controlled OC emission rate for all the cleanup materials employed, in pounds (for the calculation method, refer to section V.1.c of this permit).

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-2674]

IV. Reporting Requirements

1. The permittee shall submit deviation reports that identify each day during which any photochemically reactive material was employed in this emissions unit and each day during which the used cleanup cloths were not stored in closed containers. Each report shall identify the cause for the use of the photochemically reactive material(s), and the estimated total quantity of material(s) emitted during each such day, in pounds. Each report shall be submitted to the Director (RAPCA) within 30 days of the deviation.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-2674]

2. The permittee shall submit quarterly deviation (excursion) reports that include an identification of all 3-hour blocks of time (when the emissions unit was in operation) during which the average combustion temperature within the RTO did not comply with the temperature limitation above.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-2674]

IV. Reporting Requirements (continued)

3. The permittee also shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-2674]

4. These quarterly deviation (excursion) reports shall be submitted to the RAPCA by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-2674]

V. Testing Requirements

1. Compliance with the emissions limitations in section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation-
The OC emissions from this emissions unit shall not exceed 1.07 lbs/hr, excluding cleanup

Applicable Compliance Method-

The permittee shall demonstrate compliance based on the results of emission testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

Compliance with the hourly limitation may also be determined as follows:

i. The total potential OC emission rate from the ink, based upon the maximum hourly ink usage and respective maximum OC content, shall be multiplied by a factor of 0.80*. The product shall then be multiplied by a factor of 1 minus the destruction efficiency from the most recent performance test that demonstrated the emissions unit was in compliance.

ii. The total potential OC emission rate from the fountain solution, based upon the maximum hourly fountain solution usage and respective maximum OC content, shall be multiplied by a factor of 0.70*. The product shall then be multiplied by a factor of 1 minus the destruction efficiency from the most recent performance test that demonstrated the emissions unit was in compliance.

iii. The total potential fugitive OC emission rate from the fountain solution, based upon the maximum hourly fountain solution usage and respective maximum OC content, shall be multiplied by a factor of 0.30* (to account for a 30% fugitive emission release).

iv. The maximum hourly OC emission rate, in pounds, shall then be the sum of i, ii, and iii.
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[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-2674]

V. Testing Requirements (continued)

1.b Emission Limitation-
The OC emissions from this emissions unit shall not exceed 3.94 tons/yr, excluding cleanup

Applicable Compliance Method-
Compliance with the limitation above shall be determined based on the record keeping requirements specified in Section A.III of this permit, and the following calculation methodology:

i. The total potential OC emission rate from the inks (in pounds), as required to be recorded in section A.III.3.f., shall be multiplied by a factor of 0.80*. The product shall then be multiplied by a factor of 1 minus the destruction efficiency from the most recent performance test that demonstrated the emissions unit was in compliance.

ii. The total potential OC emission rate from the fountain solutions (in pounds), as required to be recorded in section A.III.3.g., shall be multiplied by a factor of 0.70*. The product shall then be multiplied by a factor of 1 minus the destruction efficiency from the most recent performance test that demonstrated the emissions unit was in compliance.

iii. The total potential OC emission rate from the fountain solutions (in pounds), as required to be recorded in Section A.III.3.g., shall be multiplied by a factor of 0.30*.

iv. The total monthly OC emission rate, excluding cleanup (in tons) shall be the sum of the products from i, ii, and iii, divided by 2000 lbs/ton.

v. The annual OC emission rate, excluding cleanup (in tons) shall then be the sum of the 12 monthly OC emission rates, from 1.b.iv above, for the calendar year.

* Per DAPC guidance, the following assumptions shall be used in calculating the OC emissions for this emissions unit: 20 percent of the ink solvent is retained in the web and the remaining 80 percent is vented to the regenerative thermal incinerator. 30 percent of the fountain solution emissions is fugitive, and 70 percent is vented to the regenerative thermal oxidizer. Until additional emission tests are conducted, the destruction efficiency of 97% (most recent test results 1/10/03) shall be used in this calculation.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-2674]

1.c Emission Limitations-
The OC emissions from this emissions unit shall not exceed 4.13 tons/yr, from cleanup.

Applicable Compliance Method-
Compliance with the limitation above shall be determined based on the record keeping requirements specified in Section A.III.4 of this permit, and the following calculation methodology:

i. The total monthly OC usage rate from cleanup (in pounds), as required to be recorded in section A.III.4.d., shall be multiplied by a factor of 0.50** (50% fugitive emission release), and then divided by 2000 lbs/ton.

ii. The annual OC emission rate (for cleanup, in tons) shall then be the sum of the 12 monthly OC emission rates, from V.1.c.i., for the calendar year.

** Per DAPC guidance, the cleanup operations can assume 50% of the solvent is retained in the cloths and 50% is emitted as fugitive, if the solvent has a vapor pressure of 10 mmHg or lower at 20 degrees Celsius (68 deg F). If the cleanup solvent does not have a vapor pressure of 10 mmHg or lower at 20 degrees Celsius (68 deg F), then 100% of the solvent shall be counted toward fugitive emissions.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-2674]

V. Testing Requirements (continued)

1.d Operational Restriction-
The RTO shall meet a minimum OC destruction efficiency of 97%, by weight.

Applicable Compliance Method-
Compliance with the operational restriction above shall be determined based on the of emission testing conducted in accordance with the methods and procedures outlined in section A.V.3 of this permit.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-2674]

2. USEPA Method 24A shall be used to determine the OC contents for the inks, fountain solutions and cleanup materials. If the permittee determines that Method 24A cannot be used for a particular ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24A.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-2674]

3. Within 12 months prior to permit expiration, the permittee shall conduct, or have conducted, an emission test(s) for this emissions unit in order to demonstrate compliance with the destruction efficiency for OCs and the allowable mass emission rate for OC. The organic compounds test(s) shall be conducted in accordance with the test methods and procedures specified in Methods 25 or 25A of 40 CFR, Part 60, Appendix A. The destruction efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases. The tests shall be conducted while the emissions unit is operating at or near maximum capacity.

Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification. 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 field office's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information regarding the emissions unit operating parameters.

A comprehensive written report on the results of the emissions test(s) shall be submitted within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-2674]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: 400 AB PRESS (K009)

Activity Description: LITHOGRAPHIC WEB OFFSET HEATSET PRINTING PRESS (HARRIS GRAPHICS N400 - 8 UNITS)

A. State and Federally Enforceable Section

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
K005 - Heatset Web Offset Printing Line (HWOPL), equipped with regenerative thermal oxidizer (RTO)	OAC rule 3745-31-05(A)(3) PTI 08-04282	The organic compound (OC) emissions, excluding cleanup, shall not exceed 0.83 lb/hr and 3.53 tons/yr (for this emissions unit). The OC emissions, from cleanup, shall not exceed 4.62 tons/yr (for this emissions unit). The RTO shall meet a minimum destruction efficiency of 97%, by weight, for OC (see A.II.2).
	OAC rule 3745-21-07(G)(2)	None, see Section A.II.1.

2. Additional Terms and Conditions

2.a The 0.83 lb OC/hour limit was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop additional monitoring, record keeping and/or reporting requirements to ensure compliance with this limitation.

II. Operational Restrictions

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

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04282]

2. The dryer-related OC emissions from this emissions unit shall be controlled at all times through the use of a regenerative thermal oxidizer (RTO). The RTO shall reduce emissions of organic materials, such that 97%, or more, of the carbon in the organic material is incinerated.

(Emissions units K005 and K009 are commonly controlled with an RTO with a destruction/reduction efficiency of 97%, by weight, for OC.)

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04282]

II. Operational Restrictions (continued)

3. The average combustion temperature within the regenerative thermal oxidizer, 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.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04282]

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

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04282]

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:

a. the company identification of each ink, fountain solution and cleanup material employed in this emissions unit; and

b. documentation on whether or not each ink, fountain solution and cleanup material employed is a photochemically reactive material.

c. documentation on whether or not the used cleanup cloths were stored in closed containers.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04282]

2. The permittee shall operate and maintain continuous temperature monitors and recorder(s) that measure and record(s) the combustion temperature within the RTO when the emission 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 calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

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

a. A log of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.

b. All 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04282]

III. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall collect and record the following information each month for the inks and fountain solutions employed in this emissions unit:

a. The company identification for each ink and fountain solution employed.

b. The amount of each ink employed (in pounds).

c. The number of gallons of each fountain solution employed.

d. The OC content of each ink, in percent by weight.

e. The OC content of each fountain solution, in pounds per gallon.

f. The total potential OC emission rate for all the inks employed, in pounds [i.e., the summation of (b x d/100) for all inks].

g. The total potential OC emission rate for all the fountain solutions employed, in pounds [i.e., the summation of © x e) for all fountain solutions].

h. The total controlled OC emission rate for all the inks and fountain solutions employed, in pounds (for the calculation method, refer to section V.1.b of this permit).

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04282]

4. The permittee shall collect and record the following information each month for the cleanup material employed in this emissions unit:

a. The company identification for each cleanup material employed.

b. The number of gallons of each cleanup material employed.

c. The OC content of each cleanup material employed, in pounds per gallon.

d. The total potential OC emission rate for all the cleanup materials employed, in pounds [i.e., the summation of (b x c) for all cleanup materials].

e. The total controlled OC emission rate for all the cleanup materials employed, in pounds (for the calculation method, refer to section V.1.c of this permit).

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04282]

IV. Reporting Requirements

1. The permittee shall submit deviation reports that identify each day during which any photochemically reactive material was employed in this emissions unit and each day during which the used cleanup cloths were not stored in closed containers. Each report shall identify the cause for the use of the photochemically reactive material(s), and the estimated total quantity of material(s) emitted during each such day, in pounds. Each report shall be submitted to the Director (RAPCA) within 30 days of the deviation.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04282]

2. The permittee shall submit quarterly deviation (excursion) reports that include an identification of all 3-hour blocks of time (when the emissions unit was in operation) during which the average combustion temperature within the RTO did not comply with the temperature limitation above.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04282]

IV. Reporting Requirements (continued)

3. The permittee also shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04282]

4. These quarterly deviation (excursion) reports shall be submitted to the RAPCA by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04282]

V. Testing Requirements

1. Compliance with the emissions limitations in section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation-
The OC emissions from this emissions unit shall not exceed 0.83 lb/hr, excluding cleanup

Applicable Compliance Method-

The permittee shall demonstrate compliance based on the results of emission testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

Compliance with the hourly limitation may also be determined as follows:

i. The total potential OC emission rate from the ink, based upon the maximum hourly ink usage and respective maximum OC content, shall be multiplied by a factor of 0.80*. The product shall then be multiplied by a factor of 1 minus the destruction efficiency from the most recent performance test that demonstrated the emissions unit was in compliance.

ii. The total potential OC emission rate from the fountain solution, based upon the maximum hourly fountain solution usage and respective maximum OC content, shall be multiplied by a factor of 0.70*. The product shall then be multiplied by a factor of 1 minus the destruction efficiency from the most recent performance test that demonstrated the emissions unit was in compliance.

iii. The total potential fugitive OC emission rate from the fountain solution, based upon the maximum hourly fountain solution usage and respective maximum OC content, shall be multiplied by a factor of 0.30* (to account for a 30% fugitive emission release).

iv. The maximum hourly OC emission rate, in pounds, shall then be the sum of i, ii, and iii.
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[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04282]

V. Testing Requirements (continued)

1.b Emission Limitation-
The OC emissions from this emissions unit shall not exceed 3.53 tons/yr, excluding cleanup

Applicable Compliance Method-
Compliance with the limitation above shall be determined based on the record keeping requirements specified in Section A.III of this permit, and the following calculation methodology:

i. The total potential OC emission rate from the inks (in pounds), as required to be recorded in section A.III.3.f., shall be multiplied by a factor of 0.80*. The product shall then be multiplied by a factor of 1 minus the destruction efficiency from the most recent performance test that demonstrated the emissions unit was in compliance.

ii. The total potential OC emission rate from the fountain solutions (in pounds), as required to be recorded in section A.III.3.g., shall be multiplied by a factor of 0.70*. The product shall then be multiplied by a factor of 1 minus the destruction efficiency from the most recent performance test that demonstrated the emissions unit was in compliance.

iii. The total potential OC emission rate from the fountain solutions (in pounds), as required to be recorded in Section A.III.3.g., shall be multiplied by a factor of 0.30*.

iv. The total monthly OC emission rate, excluding cleanup (in tons) shall be the sum of the products from i, ii, and iii, divided by 2000 lbs/ton.

v. The annual OC emission rate, excluding cleanup (in tons) shall then be the sum of the 12 monthly OC emission rates, from 1.b.iv above, for the calendar year.

* Per DAPC guidance, the following assumptions shall be used in calculating the OC emissions for this emissions unit: 20 percent of the ink solvent is retained in the web and the remaining 80 percent is vented to the regenerative thermal incinerator. 30 percent of the fountain solution emissions is fugitive, and 70 percent is vented to the regenerative thermal oxidizer. Until additional emission tests are conducted, the destruction efficiency of 97% (most recent test results 1/10/03) shall be used in this calculation.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04282]

1.c Emission Limitations-
The OC emissions from this emissions unit shall not exceed 4.62 tons/yr, from cleanup.

Applicable Compliance Method-
Compliance with the limitation above shall be determined based on the record keeping requirements specified in Section A.III.4 of this permit, and the following calculation methodology:

i. The total monthly OC usage rate from cleanup (in pounds), as required to be recorded in section A.III.4.d., shall be multiplied by a factor of 0.50** (50% fugitive emission release), and then divided by 2000 lbs/ton.

ii. The annual OC emission rate (for cleanup, in tons) shall then be the sum of the 12 monthly OC emission rates, from V.1.c.i., for the calendar year.

** Per DAPC guidance, the cleanup operations can assume 50% of the solvent is retained in the cloths and 50% is emitted as fugitive, if the solvent has a vapor pressure of 10 mmHg or lower at 20 degrees Celsius (68 deg F). If the cleanup solvent does not have a vapor pressure of 10 mmHg or lower at 20 degrees Celsius (68 deg F), then 100% of the solvent shall be counted toward fugitive emissions.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04282]

V. Testing Requirements (continued)

1.d Operational Restriction-
The RTO shall meet a minimum OC destruction efficiency of 97%, by weight.

Applicable Compliance Method-
Compliance with the operational restriction above shall be determined based on the of emission testing conducted in accordance with the methods and procedures outlined in section A.V.3 of this permit.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04282]

2. USEPA Method 24A shall be used to determine the OC contents for the inks, fountain solutions and cleanup materials. If the permittee determines that Method 24A cannot be used for a particular ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24A.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04282]

3. Within 12 months prior to permit expiration, the permittee shall conduct, or have conducted, an emission test(s) for this emissions unit in order to demonstrate compliance with the destruction efficiency for OCs and the allowable mass emission rate for OC. The organic compounds test(s) shall be conducted in accordance with the test methods and procedures specified in Methods 25 or 25A of 40 CFR, Part 60, Appendix A. The destruction efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases. The tests shall be conducted while the emissions unit is operating at or near maximum capacity.

Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification. 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 field office's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information regarding the emissions unit operating parameters.

A comprehensive written report on the results of the emissions test(s) shall be submitted within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04282]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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