

Control of volatile organic compound emissions from offset lithographic printing and letterpress printing facilities.

[Comment: For dates and availability of non-regulatory government publications, publications of recognized organizations and associations, federal rules, and federal statutory provisions referenced in this rule, see paragraph (HH) of rule 3745-21-01 of the Administrative Code titled "Referenced materials."]

(A) The requirements of paragraphs (B) to (I) of this rule shall apply to each lithographic printing or letterpress printing facility that meets all the following criteria:

- (1) The facility is located in Ashtabula, Cuyahoga, Geauga, Lake, Lorain, Medina, Portage, or Summit county.
- (2) The facility employs letterpress printing or one or more of the following types of offset lithographic printing processes: heatset web, non-heatset web or sheet-fed.
- (3) Any offset lithographic printing or letterpress printing facility whose total actual, before the application of control systems and devices, VOC emissions from all lithographic and/or letterpress printing operations (including emissions from cleaning solutions used on lithographic and/or letterpress printing presses and fountain solutions) are equal to or greater than three tons of VOCs per rolling twelve-month period.

(B) Exemptions.

The following operations are exempt from the following requirements of this rule:

- (1) For only the fountain solution requirements as contained in paragraph (D)(3)(b) of this rule:
 - (a) Any sheet-fed press with a maximum sheet size eleven by seventeen inches or smaller.
 - (b) Any press with a total fountain solution reservoir capacity of less than one gallon.
- (2) For only the requirement to install add-on controls as contained in paragraph (D)(1) of this rule:
 - (a) Any heatset press with a maximum web width of 22.0 inches or less.
 - (b) Any heatset web press with potential VOC emissions from ink oil less than or equal to twenty-five tons per year before the application of controls.

(c) Any heatset press used for book printing.

(C) Definitions.

The definitions applicable to this rule are contained in paragraphs (W) and (DD) of rule 3745-21-01 of the Administrative Code.

(D) VOC emissions control requirements.

- (1) Any person who owns or operates a subject heatset web offset lithographic printing press or a heatset web letterpress printing press with potential VOC ink oil emissions from the press dryer that are greater than twenty-five tons per year before the application of control systems and devices shall maintain the dryer air pressure lower than the pressroom air pressure at all times the press is operating and operate a control system that meets one of the following control requirement for that press:
 - (a) For a control system first installed before the effective date of this rule the control system shall reduce VOC emissions from each dryer by at least ninety per cent or maintain a maximum VOC outlet concentration of twenty ppmv, as hexane (C₆H₁₄) on a dry basis, whichever is less stringent; or
 - (b) For a control system first installed on or after the effective date of this rule, the control system shall reduce VOC emissions from each dryer by at least ninety-five per cent or maintain a maximum VOC outlet concentration of twenty ppmv as hexane (C₆H₁₄) on a dry basis, whichever is less stringent.
- (2) Any person who owns or operates a subject heatset web offset lithographic printing press shall meet one of the following requirements for the fountain solution used on that press:
 - (a) If the fountain solution contains only alcohol substitutes, maintain the as-applied VOC content of the fountain solution at or below 5.0 per cent, by weight, and use no alcohol in the fountain solution.
 - (b) If the fountain solution contains alcohol:
 - (i) Maintain the as-applied VOC content of the fountain solution at or below 1.6 per cent, by weight; or
 - (ii) Maintain the as-applied VOC content of the fountain solution at or below 3.0 per cent, by weight, and refrigerate the fountain solution to sixty degrees Fahrenheit or less.

- (3) Any person who owns or operates a subject sheet-fed offset lithographic printing press shall meet one of the following requirements for the fountain solution used on that press:
 - (a) If the fountain solution contains only alcohol substitutes, maintain the as-applied VOC content of the fountain solution at or below 5.0 per cent, by weight.
 - (b) If the fountain solution contains alcohol:
 - (i) Maintain the as-applied VOC content of the fountain solution at or below 5.0 per cent, by weight; or
 - (ii) Maintain the as-applied VOC content of the fountain solution at or below 8.5 per cent, by weight, and refrigerate the fountain solution to sixty degrees Fahrenheit or less.
- (4) Anyone who owns or operates a subject non-heatset web offset lithographic printing press shall maintain the as-applied VOC content of the fountain solution used on that press at or below 5.0 per cent, by weight, and use no alcohol in the fountain solution.
- (5) Where it can be demonstrated to the satisfaction of the director that a subject lithographic printing press cannot be operated with fountain solutions meeting the limits in paragraph (D)(2), (D)(3), or (D)(4) of this rule for reasons of technological and/or economic feasibility the permitting authority may establish site-specific limits based upon evidence of technological or economic infeasibility subject to approval by USEPA as a state implementation plan revision.
- (6) Any person who owns or operates a subject offset lithographic or letterpress printing press shall meet one of the following requirements for each cleaning solution used for cleaning on that press:
 - (a) Maintain the as-applied VOC content at or below seventy per cent, by weight; or
 - (b) Maintain the as-applied VOC composite partial vapor pressure at or below ten mm Hg at twenty degrees Celsius (sixty-eight degrees Fahrenheit).

The use of cleaning solutions not meeting the specifications of paragraphs (D)(6)(a) and (D)(6)(b) of this rule is permitted provided that the quantity used does not exceed one hundred ten gallons over any consecutive twelve-month period.

- (7) Any person who owns or operates a subject offset lithographic or letterpress printing press shall keep all solvent containers closed at all times unless filling, draining, or performing cleanup operations.
- (8) Any person who owns or operates a subject offset lithographic or letterpress printing press shall keep all solvent-laden shop towels in closed containers when not being used.

(E) Compliance dates.

- (1) The owner or operator of an offset lithographic or letterpress printing facility that is subject to this rule shall comply with the requirements of this rule no later than the following dates:
 - (a) For any subject offset lithographic printing press or letterpress printing press for which installation commenced before the effective date of this rule, the compliance date for the press is twelve months from the effective date of this rule.
 - (b) For any subject offset lithographic printing press or letterpress printing press for which installation commenced on or after the effective date of this rule, the compliance date for the press is the initial startup date of the press.
- (2) The owner or operator of an offset lithographic or letterpress printing facility that is subject to this rule shall demonstrate compliance with paragraph (D)(1) of this rule by testing the control device on each subject offset lithographic press or letterpress printing press in accordance with paragraph (F)(1) of this rule according to the following:
 - (a) For any offset lithographic or letterpress printing facility subject to paragraph (E)(1)(a) of this rule, within ninety days after the press's compliance date. If compliance with paragraph (D)(1)(a) of this rule has been demonstrated within three hundred sixty-five calendar days before the effective date of this rule by testing the control device in accordance with an Ohio EPA-approved testing protocol, no additional testing shall be required to satisfy paragraph (E)(2) of this rule.
 - (b) For any offset lithographic or letterpress printing facility subject to paragraph (E)(1)(b) of this rule, within one hundred eighty days after the press's compliance date.
- (3) Additional testing of a subject offset lithographic or letterpress printing press and its VOC emission control system in accordance with paragraph (F)(1) of this rule may be required by the director to ensure continued compliance.

(F) Compliance test methods.

- (1) For any heatset web offset or heatset web letterpress printing press that is subject to the requirements of paragraph (D)(1) of this rule, compliance shall be determined by performing emission tests in accordance with the following:
 - (a) For the purpose of demonstrating compliance with the emission control requirements paragraph (D)(1) of this rule, the affected source shall be run at typical operating conditions and flow rates compatible with scheduled production during any emission testing.
 - (b) The negative dryer pressure shall be established during the initial test using an airflow direction indicator, such as a smoke stick or aluminum ribbons, or differential pressure gauge.
 - (c) The following USEPA test methods (in 40 CFR Part 60, Appendix A) shall be used to demonstrate compliance with the applicable emission control requirement in paragraph (D)(1) of this rule.
 - (i) USEPA method 1 or 1A, as appropriate, shall be used to select the sampling sites.
 - (ii) USEPA method 2, 2A, 2C, or 2D, as appropriate, shall be used to determine the velocity and volumetric flow rate of the exhaust stream.
 - (iii) USEPA method 3 or 3A, as appropriate, shall be used to determine the concentration of O₂ and CO₂.
 - (iv) USEPA method 4 shall be used to determine moisture content.
 - (v) USEPA method 18, 25, or 25A shall be used to determine the VOC concentration of the exhaust stream entering and exiting the control device, unless the alternate limit of twenty ppmv as specified in paragraphs (D)(1)(a) and (D)(1)(b) of this rule is being met, in which case only the VOC concentration of the exit exhaust shall be determined. In cases where the anticipated outlet VOC concentration of the control device is less than fifty ppmv as carbon, method 25A shall be used.
 - (a) If the average concentrations in the outlet of a thermal or catalytic oxidizer measured by method 25A are found to be greater than fifty ppmv as carbon, Method 18 or 25 may be used to determine non-VOC components (methane and ethane) to correct the outlet VOC readings, unless the director determines that the uncorrected method 25A results are acceptable.

provided by the supplier and data obtained by USEPA method 24, the data obtained by USEPA method 24 shall be employed.

- (d) For any offset lithographic printing press that is subject to the requirements of paragraph (D)(2)(b) or (D)(3)(b) of this rule, when adding alcohol to a fountain solution batch previously tested in accordance with one of the compliance test methods contained in paragraphs (F)(2)(a) to (F)(2)(c) of this rule, in lieu of the methods in paragraphs (F)(2)(a) to (F)(2)(c) of this rule, the owner or operator shall determine the VOC (alcohol) content of the altered fountain solution using a hydrometer.
- (3) For any offset lithographic printing press that is subject to the fountain solution temperature requirements of paragraph (D)(2)(b)(ii) or (D)(3)(b)(ii) of this rule, a thermometer or other temperature detection device capable of reading to 0.5 degrees Fahrenheit shall be used to ensure that any refrigerated fountain solution reservoirs are maintained at or below sixty degrees Fahrenheit at all times.
 - (4) For any offset lithographic printing press that is subject to the requirements of paragraph (D)(6)(a) of this rule, the VOC content of cleaning solutions shall be determined by one of the following methods:
 - (a) USEPA method 24 shall be used to determine the VOC content of the cleaning solution;
 - (b) If diluted prior to use, a calculation shall be performed for VOC content that combines USEPA method 24 analytical data for the concentrated materials used to prepare the cleaning solution and the proportions in which they are mixed to make the as-applied cleaning solution. The analysis of the concentrated material(s) may be performed by the supplier(s) of those material(s). The analytical data may be derived from a material safety data sheet (MSDS) or equivalent information from the supplier as long as it is based on USEPA method 24 results; or
 - (c) If not diluted prior to use, the owner or operator shall use formulation information provided by the supplier, such as MSDS sheet or equivalent information from the supplier. In the event of a dispute between information provided by the supplier and data obtained by USEPA method 24, the data obtained by USEPA method 24 shall be employed.
 - (5) For any offset lithographic printing press that is subject to the requirements of paragraph (D)(6)(b) of this rule, the VOC composite partial vapor pressure of cleaning solutions shall be determined by one of the following methods:
 - (a) If diluted prior to use, calculate the VOC composite vapor pressure of the as-applied solvent by using the formula for "VOC composite vapor pressure" as follows:

- (i) Determine the identity and quantity of each compound in a blended organic solvent by using ASTM D2306, or by using ASTM E260 for organics and ASTM D3792 for water content, if applicable, or the manufacturer's product formulation data.
- (ii) Determine the vapor pressure of each pure VOC component by using ASTM D2879 or publications such as "Perry's Chemical Engineer's Handbook, CRC Handbook of Chemistry and Physics, or Lange's Handbook of Chemistry."
- (iii) Calculate the VOC composite partial pressure of the solvent by using the formula for "VOC composite partial pressure." For the purpose of this calculation, the blended solvent shall be assumed to be an ideal solution where "Raoult's Law" applies. The partial vapor pressures of each compound at twenty degrees Celsius (sixty-eight degrees Fahrenheit) shall be used in the formula. The VOC composite partial pressure shall be calculated as follows:

$$PP_c = \sum_{i=1}^n \frac{(W_i)(VP_i) / MW_i}{\frac{W_w}{MW_w} + \frac{W_e}{MW_e} + \sum_{i=1}^n \frac{W_i}{MW_i}}$$

Where:

W_i = Weight of the "i"th VOC compound, in grams.

W_w = Weight of water, in grams.

W_e = Weight of exempt compound, in grams.

MW_i = Molecular weight of the "i"th VOC compound, in grams per gram-mole.

MW_w = Molecular weight of water, in grams per gram-mole.

MW_e = Molecular weight of the "e"th exempt compound, in grams per gram- mole.

PP_c = VOC composite partial vapor pressure at twenty degrees Celsius (sixty-eight degrees Fahrenheit), in mm Hg.

VP_i = Vapor pressure of the "i"th VOC compound at twenty degrees Celsius (sixty-eight degrees Fahrenheit), in mm Hg.

- (b) If not diluted prior to use, the owner or operator shall use formulation information provided by the supplier, such as a material safety data sheet (MSDS) or equivalent information from the supplier as long as it is based on results determined in accordance with the procedure under paragraph (F)(5)(a) of this rule.

(G) Monitoring and record keeping requirements.

- (1) The owner or operator of an offset lithographic printing press or letterpress printing press that is subject to the control requirements specified in paragraph (D)(1) of this rule, shall install and operate continuous temperature monitoring and recording equipment that measures and records temperature data at least once every fifteen minutes, and shall collect and record the following information and maintain the information at the facility for a period of five years:
 - (a) For each day of operation of the press, a log or record of the operating time for the control device, monitoring equipment, and the associated press.
 - (b) For thermal oxidizers, for each day of operation of the press, all three-hour periods of operation during which the average combustion temperature was more than fifty degrees Fahrenheit below the average combustion temperature during the most recent emission test that demonstrated that the press was in compliance.
 - (c) For catalytic oxidizers, for each day of operation of the press, all three-hour periods of operation during which the average temperature of the dryer exhaust gases immediately before the catalyst bed was more than fifty degrees Fahrenheit below the average temperature of the dryer exhaust gases during the most recent emission test that demonstrated that the press was in compliance.
 - (d) For catalytic oxidizers, the catalyst bed material shall be inspected annually for general catalyst condition and any signs of potential catalyst depletion. The owner or operator shall also collect a representative sample of the catalyst from the oxidizer, per manufacturer's recommendations, and have it tested to evaluate the catalyst's capability to continue to function at or above the required control efficiency. An evaluation of the catalyst bed material shall be conducted whenever the results of the inspection indicate signs of potential catalyst depletion or poor catalyst condition based on manufacturer's recommendations, but not less than once per year.
- (2) The owner or operator of a heatset web or sheet-fed offset lithographic printing press subject to the requirements of paragraph (D)(2)(b) or (D)(3)(b) of this rule shall measure:

- (a) The VOC (alcohol) content, in accordance with paragraph (F)(2)(d) of this rule, of any altered fountain solution, at the time of alteration, in per cent by weight, of the fountain solution employed in the press and shall maintain records of the results of the measurements at the facility for a period of five years. The alcohol content of the fountain solution shall be measured using a hydrometer. The hydrometer shall have a visual, analog, or digital readout with an accuracy of 0.5 per cent; and a standard solution shall be used to calibrate the hydrometer for the type of alcohol used in the fountain solution.
 - (b) On a daily basis, the temperature, in degrees Fahrenheit, of the fountain solution, if the owner or operator refrigerates the fountain solution in accordance with paragraph (D)(2)(b)(ii) or (D)(3)(b)(ii) of this rule, and shall maintain records of the results of the measurements at the facility for a period of five years
- (3) The owner or operator of a subject lithographic printing press shall maintain records of the following information for each batch of fountain solution prepared for use in the press:
 - (a) The volume and VOC content of each concentrated alcohol substitute, added to make the batch of fountain solution, based upon the manufacturer's laboratory analysis using USEPA method 24.
 - (b) The volume of alcohol added to make the batch of fountain solution.
 - (c) The volume of water added to make the batch of fountain solution.
 - (d) The calculated VOC content of the final, mixed batch.
 - (e) The date and time the batch was prepared.
- (4) The owner or operator of a subject non-heatset web offset lithographic printing press shall document all periods of time when alcohol was used in the press's fountain solution and the volume of alcohol used in each instance.
- (5) The owner or operator shall maintain monthly records of the VOC content or VOC composite partial vapor pressure of all cleaning materials employed in all the lithographic and letterpress printing operations.
- (6) The owner or operator of a subject lithographic printing press or letterpress printing press shall maintain monthly records of the following information:
 - (a) The total amount, in gallons, of all the cleanup materials employed; and

- (b) The total amount, in gallons, of all the cleanup materials employed that exceeds the allowable VOC content or VOC composite vapor pressure.

(H) Reporting requirements for the monitoring and record keeping information.

The owner or operator of a lithographic or letterpress printing facility that is subject to this rule shall notify the director of the following exceedances. Each notification shall be submitted to the director within forty-five days after the instance occurs, and it shall include a copy of the record showing the instance.

- (1) Each hydrometer measurement that shows an exceedance of the applicable alcohol content limitation specified in paragraph (D)(2)(a), (D)(2)(b), (D)(3)(a), or (D)(3)(b) of this rule.
- (2) Each temperature reading that shows an exceedance of the temperature limitation specified in paragraph (D)(2)(b) or (D)(3)(b) of this rule.
- (3) Each calculated VOC content that exceeds the VOC content limitation specified in paragraph (D)(2)(b), (D)(3)(b), or (D)(4) of this rule.
- (4) Each instance when an exceedance of the alcohol usage restriction as specified for fountain solutions in paragraphs (D)(2)(b) and (D)(3)(b) of this rule occurs.
- (5) Each instance when alcohol is used in the fountain solution for a non-heatset web offset lithographic printing press.
- (6) Each instance when an exceedance of the VOC content or VOC composite partial vapor pressure specified in paragraph (D)(6) of this rule for cleanup materials occurs.
- (7) All three-hour blocks of time during which the average combustion temperature within the thermal oxidizer was below the temperature limitation specified in paragraph (G)(1)(b) of this rule.
- (8) All three-hour blocks of time when the emissions unit was in operation during which the average temperature of the exhaust gases immediately before the catalyst bed was below the temperature limitations specified paragraph (G)(1)(c) of this rule.

(I) Retention factors and capture efficiencies.

For purposes of determining VOC emissions from offset lithographic printing operations, the following retention factors and capture efficiencies shall be used:

- (1) A portion of the VOC contained in inks and cleaning solution is retained in the printed web or in the shop towels used for cleaning. The following retention factors shall be used:
 - (a) A twenty per cent VOC retention factor shall be used for heatset inks printed on absorptive substrates, meaning eighty per cent of the VOC in the ink is emitted during the printing process and is available for capture and control by an add-on pollution control device.
 - (b) A ninety-five per cent VOC retention factor shall be used for sheet-fed and non-heatset web inks printed on absorptive substrates, meaning five per cent of the VOC in the ink is emitted during the printing process.
 - (c) A fifty per cent VOC retention factor shall be used for cleaning solution VOC in shop towels for cleaning solutions with a VOC composite vapor pressure of no more than ten mm Hg at twenty degrees Celsius (sixty-eight degrees Fahrenheit) if the contaminated shop towels are kept in closed containers, meaning fifty per cent of the VOC used on the shop towels is emitted during the cleaning process.
- (2) A portion of the VOC contained in inks, fountain solutions, and automatic blanket washes on heatset presses is captured in the press dryer for control by add-on pollution control devices. The following capture efficiencies are to be used:
 - (a) A one hundred per cent VOC carry over efficiency shall be used for inks. All the VOC in the ink that is not retained is assumed to be volatilized in the press dryer. Capture efficiency testing for heatset dryers is not required if it is demonstrated that pressure in the dryer is negative relative to the surrounding press room and the airflow is into the dryer.
 - (b) A seventy per cent VOC carry over efficiency shall be used for fountain solutions containing alcohol substitutes.
 - (c) A forty per cent VOC carry over efficiency shall to be used for automatic blanket wash solutions with a VOC composite vapor pressure of no more than ten mm Hg at twenty degrees Celsius (sixty-eight degrees Fahrenheit).
- (J) Requirements on applicability notification, compliance certification, and permit application.
 - (1) The owner or operator of a lithographic printing or letterpress printing facility that is subject to this rule and that has an offset lithographic printing press or letterpress printing press with an initial startup date before the effective date of this rule shall notify the Ohio environmental protection agency district office or local air agency in writing that the offset lithographic printing press or

letterpress printing press is subject to this rule. The notification, which shall be submitted not later than sixty days after the effective date of this rule (or within sixty days after the offset lithographic printing press or letterpress printing press becomes subject to this rule), shall provide the following information:

- (a) Name and address of the owner or operator;
 - (b) Address (i.e., physical location) of the lithographic printing or letterpress printing facility;
 - (c) Equipment description and Ohio EPA application number (if assigned) of the offset lithographic printing press or letterpress printing press;
 - (d) Identification of the VOC emission requirement, the means of compliance, and the compliance date for the offset lithographic printing press or letterpress printing press;
 - (e) Regarding an air pollution permit for the offset lithographic printing press or letterpress printing press, whichever of the following is applicable:
 - (i) Submission of an application for an operating permit, an operating permit modification, or an operating permit renewal in accordance with rule 3745-31-02 of the Administrative Code; or
 - (ii) Submission of a statement of intent to submit an application for a Title V permit or modification of a Title V permit in accordance with paragraph (B) of rule 3745-77-02 or rule 3745-77-06 of the Administrative Code, respectively.
- (2) The owner or operator of a lithographic printing or letterpress printing facility that is subject to this rule and that has an offset lithographic printing press or letterpress printing press with an initial startup date on or after the effective date of this rule shall notify the Ohio environmental protection agency district office or local air agency in writing that the offset lithographic printing press or letterpress printing press is subject to this rule. The notification, which shall be submitted not later than either the date of initial startup of the offset lithographic printing press or letterpress printing press, or sixty days after the effective date of this rule (whichever is later), shall provide the information listed under paragraph (I)(1) of this rule. The application for an installation permit under rule 3745-31-02 of the Administrative Code may be used to fulfill the notification requirements of this paragraph.
- (3) Compliance certification.
- (a) The owner or operator of a lithographic printing or letterpress printing facility that is subject to this rule shall notify the Ohio environmental

protection agency district office or local air agency in writing within thirty days following the completion of any of the following requirements:

- (i) For an offset lithographic printing press or letterpress printing press subject to the VOC emission requirements in paragraphs (D)(2) to (D)(7) of this rule, the first documented achievement of compliance with each of the requirements;
- (ii) For an offset lithographic printing press or letterpress printing press subject to the VOC emission control requirement in paragraph (D)(1) of this rule:
 - (a) The completion of installation and initial use of a VOC emission control system for the offset lithographic printing press or letterpress printing press;
 - (b) The completion of installation and initial use of any monitoring devices required under paragraph (G) of this rule for the offset lithographic printing press; and
 - (c) The completion of any compliance testing conducted in accordance with paragraph (F) of this rule to demonstrate compliance with the applicable control requirement.
- (b) The compliance certification under paragraph (I)(3)(a) of this rule shall provide the following, where applicable:
 - (i) A description of the requirements;
 - (ii) A description of the VOC emission control system;
 - (iii) A description of the monitoring devices;
 - (iv) A description of the records that document continuing compliance;
 - (v) The results of any compliance tests, including documentation of test data;
 - (vi) The results of any records that document continuing compliance, including calculations; and
 - (vii) A statement by the owner or operator of the lithographic printing or letterpress printing facility as to whether the offset lithographic printing press or letterpress printing press has complied with the requirement(s).

(K) Requirements for an owner or operator of an offset lithographic printing or letterpress printing facility that determines they are not subject to one or more of the control requirements in paragraph (D) of this rule.

- (1) When establishing that the offset lithographic printing or letterpress printing facility's total actual, before the application of control systems and devices, VOC emissions from all lithographic and/or letterpress printing operations (including emissions from cleaning solutions used on lithographic and/or letterpress printing presses and fountain solutions) are less than three tons of VOCs per rolling twelve-month period and, therefore, the facility is not subject to the add-on control, cleaning solvent and fountain solution requirements in paragraphs (D)(1) to (D)(8) of this rule, the owner or operator shall maintain the following records on a monthly basis:
 - (a) The total gallons of each cleaning solvent used;
 - (b) The VOC content of each cleaning solvent;
 - (c) The total gallons of each fountain solution used;
 - (d) The VOC content of each fountain solution;
 - (e) The total pounds of each ink used; and
 - (f) The VOC content of each ink.
- (2) When establishing that the offset lithographic printing or letterpress printing potential VOC ink oil emissions, before control, from the press dryer of any heatset web offset lithographic printing press or heatset web letterpress printing press are less than twenty-five tons per year and, therefore, the facility is not subject to the add-on control requirements in paragraph (D)(1) of this rule, the owner or operator shall maintain the following records on a monthly basis:
 - (a) The total pounds of each ink used;
 - (b) The VOC content of each ink; and
 - (c) The hours of operation of each press.
- (3) If an owner or operator of an offset lithographic printing or letterpress printing facility determines they are subject to one or more of the control requirements in paragraph (D) of this rule based on the records required under paragraph (J) of this rule, the owner or operator shall comply with said requirement(s) of this rule.

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