John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

4/22/2013

Certified Mail

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Lance George
Multi-Color Corporation
4053 Clough Woods Drive
Batavia, OH 45103

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1413020513
Permit Number: P0112924
Permit Type: Initial Installation
County: Clermont

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO)for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, The Clermont Sun. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page,www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

and

Southwest Ohio Air Quality Agency
250 William Howard Taft Rd.
Cincinnati, OH 45219

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Southwest Ohio Air Quality Agency at (513)946-7777.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
SWOAQA; Indiana; Kentucky

PUBLIC NOTICE
4/22/2013 Issuance of Draft Air Pollution Permit-To-Install and Operate

Multi-Color Corporation
4053 Clough Woods Drive,
Batavia, OH 45103
Clermont County
FACILITY DESC.: Commercial Flexographic Printing
PERMIT #: P0112924
PERMIT TYPE: Initial Installation
PERMIT DESC: Initial Installation permit for flexographic/lithographic/rotogravure presses.

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: http://epa.ohio.gov/dapc/permitsonline.aspx by entering the permit # or: Alberta Mellon, Southwest Ohio Air Quality Agency, 250 William Howard Taft Rd., Cincinnati, OH 45219. Ph: (513)946-7777

Permit Strategy Write-Up

1. Check all that apply:

   _X_ Synthetic Minor Determination

   Netting Determination

2. Source Description:

   Multi-Color is a printing facility which employs several Flexographic, Lithographic, and Gravure printing presses. The facility also employs a cleanup station to support the presses. This permit is for the installation of 3 new emission units, all of which are printing presses.

3. Facility Emissions and Attainment Status:

   Clermont County is non-attainment for Ozone. The facility is synthetic minor for VOC and HAPs. This permit will allow 99.0 TPY VOC emissions, 24.9 TPY total HAPs emissions and 9.9 TPY for any single HAPs.

4. Source Emissions:

   The facility is synthetic minor for VOC and HAPs. This permit will allow 99.0 TPY VOC emissions, 24.9 TPY total HAPs emissions and 9.9 TPY for any single HAPs.

5. Conclusion:

   SWOAQA's recommendation is to proceed with the permit for these emission units.

6. Please provide additional notes or comments as necessary:

   Permit Numbers P0112611 and P0112924 were completed in conjunction. The facility requested to install 3 new units in P0112924 and requested modifications to all currently active emission units at the facility. The modification involved removal of annual material usage restrictions and an increase in the allowable %VOC content in their coatings. The facility requested to accept facility wide emission limit restrictions for VOC and HAPs as an alternative. The request was made for the purpose of accommodating an increased need for flexibility for their expanding business. A letter of explanation was provided by the facility and is included in this PTIO application, for the increased need for flexibility and facility wide limits.

7. Total Permit Allowable Emissions Summary (for informational purposes only):

Pollutant	Tons Per Year
HAPs	24.9 total HAPS 9.9 single HAP
VOC	99.0

DRAFT

Division of Air Pollution Control
Permit-to-Install and Operate
for
Multi-Color Corporation

Facility ID:	1413020513
Permit Number:	P0112924
Permit Type:	Initial Installation
Issued:	4/22/2013
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Division of Air Pollution Control
Permit-to-Install and Operate
for
Multi-Color Corporation

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Authorization

Facility ID:	1413020513
Application Number(s):	A0045928
Permit Number:	P0112924
Permit Description:	Initial Installation permit for flexographic/lithographic/rotogravure presses.
Permit Type:	Initial Installation
Permit Fee:	$600.00*DO NOT send payment at this time, subject to change before final issuance*
Issue Date:	4/22/2013
Effective Date:	To be entered upon final issuance
Expiration Date:	To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date:	To be entered upon final issuance

This document constitutes issuance to:

Multi-Color Corporation
4053 Clough Woods Drive
Batavia, OH 45103

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Southwest Ohio Air Quality Agency
250 William Howard Taft Rd.
Cincinnati, OH 45219
(513)946-7777

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s))listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

Authorization (continued)

Permit Number: P0112924
Permit Description: Initial Installation permit for flexographic/lithographic/rotogravure presses.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	**K010**
Company Equipment ID:	Omet VF670 12-Unit #2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K011**
Company Equipment ID:	Nilpeter 13-Unit
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**R009**
Company Equipment ID:	Komori 7-Unit Press #2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

  You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement.Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Southwest Ohio Air Quality Agency in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit 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.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting[1] a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

Can I transfer this permit to a new owner or operator?

[1] Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

   a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

      (1) None.

   b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

      2., 3., 4., 5., 6., 7. and 8.

2. The total allowable emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K001, K002, K004, K005, K006, K007, K008, K009 K010, K011, P002, R001, R002, R009, other de minimus air contaminant sources, as defined in OAC rule 3745-15-05, and other air contaminant sources exempt from the requirement to obtain a permit-to-install pursuant to OAC rule 3745-31-03 installed subsequent to the issuance of this permit, combined, shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

3. The total allowable emissions of Volatile Organic Compounds (VOCs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K001, K002, K004, K005, K006, K007, K008, K009 K010, K011, P002, R001, R002, R009, other de minimus air contaminant sources, as defined in OAC rule 3745-15-05, and other air contaminant sources exempt from the requirement to obtain a permit-to-install pursuant to OAC rule 3745-31-03 installed subsequent to the issuance of this permit, combined, shall not exceed 99.0 TPY. Compliance with the VOC limitation shall be based on a rolling, 12-month summation.

4. The permittee shall collect and record the following information each month for the emissions units identified in 2 and 3.

   a) The name and identification number for each coating and cleanup material employed.

   b) The individual Hazardous Air Pollutant (HAP) content for each HAP of each coating and cleanup material in pounds of individual HAP per gallon of material, as applied.

   c) The total combined HAP content of each coating and cleanup material in pounds of combined HAPs per gallon of material, as applied [sum all the individual HAP contents from (b)].

   d) The total VOC content of each coating and cleanup material in pounds per gallon of material, as applied.

   e) The number of gallons of each coating and cleanup material employed.

   f) The total individual HAP usage for each HAP from all coatings and cleanup materials employed, in pounds or tons per month [for each HAP the sum of (b) times (e) for each coating and cleanup material].

g) The total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per month [the sum of (c) times (e) for each coating and cleanup material].

h) The total combined VOC usage from all coatings and cleanup materials employed, in pounds or tons per month [the sum of (d) times (e) for each coating and cleanup material].

i) The updated rolling, 12-month summation of usage for each individual HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

j) The updated rolling, 12-month summation of usage for total combined HAPs, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

k) The updated rolling, 12-month summation of usage for VOCs, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. This information does not have to be kept on a line-by-line basis.

5. The permittee shall notify the Southwest Ohio Air Quality Agency of any exceedance of the HAP emission limitations outlined in 2. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June, and July through September, respectively).

6. The permittee shall notify the Southwest Ohio Air Quality Agency of any exceedance of the VOC emission limitations outlined in 3. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June, and July through September, respectively).

7. Compliance with the emission limitations in B.2. and B.3 of these terms and conditions shall be determined in accordance with the following methods:

a) Emission Limitation:

9.9 TPY for any single HAP and 24.9 TPY for combined HAPs, based on a rolling 12-month summation for the emissions units listed in 2.

Applicable Compliance Method:

Compliance with the HAP emission limitations shall be demonstrated by the record keeping requirements specified in 4.

b) Emission Limitation:

99.0 TPY for VOCs, based on a rolling 12-month summation for the emissions units listed in 3.

Applicable Compliance Method:

Compliance with the VOC emission limitations shall be demonstrated by the record keeping requirements specified in 4.

8. The permittee commits to and meets the criteria to be considered an area source for Hazardous Air Pollutants, and is subject only to the record keeping and reporting provisions in 40 CFR 63.829(d) and 40 CFR 63.830(b)(1).

C. Emissions Unit Terms and Conditions

1. K010, Omet VF670 12-Unit #2

Operations, Property and/or Equipment Description:

Omet VF670 12-Unit Flexographic Rotogravure Printing Press #2

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. g)(1).

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)c.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T)	VOC emissions shall not exceed 44.38 tons per year for emission units K007 and K010 combined, based on a rolling, 12-month summation from coating usage only. See b)(2)a.
b.	OAC rule 3745-21-09(Y)(1)	Exempt per OAC rule 3745-21-09(Y)(2)(d). See b)(2)b.
c.	OAC rule 3745-31-05(D)	See sections B.2. and B.3.

(2) Additional Terms and Conditions

a. Compliance with ORC 3704.03(T) shall be demonstrated by the VOC emissions limitations.

b. This facility is exempt from the requirements of OAC rule 3745-21-09(Y)(1) because the total maximum usage of VOC in all coatings and inks employed in all flexographic, packaging rotogravure, and publication rotogravure printing lines within the facility is less than or equal to 100 tons of VOC per year.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for this emissions unit:

a. The name and identification number of each coating employed;

b. The VOC content of each coating, as applied, in percent by weight;

c. The amount of each coating employed, in pounds;

d. The total VOC emissions from all coatings employed, which is the summation of d)(1)b. multiplied by d)(1)c. for all the coatings employed, and

e. The updated rolling, 12-month summation of VOC emissions from all coatings employed, in tons [this shall include the total for the current months VOC emissions, plus the total for the preceding eleven calendar months.

e) Reporting Requirements

(1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA e-Business Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

VOC emissions shall not exceed 44.38 tons per year for emission units K007 and K010 combined, based on a rolling, 12-month summation from coating usage only.

Applicable Compliance Method:

The emission limitation was calculated using the following equation:

[{(7.8 lb/hr of solvent based adhesive) (96% by wt. of VOC content)} + {(18.05 lb/hr of water based coatings) (11% by wt. of VOC content)} + {(43.85 lb/hr UV coatings) (1.5% by wt. of VOC content)}]{(8760 hours of operation per year) (1/2000 ton per pounds)}

= 44.38 tons of VOC per year.

Compliance with the annual VOC emission limitation from coating operations shall be demonstrated by the recordkeeping requirement in d)(1).

g) Miscellaneous Requirements

(1) Modeling to demonstrate compliance with, the “Toxic Air Contaminant Statute”, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit’s maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified FEPTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new FEPTIO.

K011, Nilpeter 13-Unit

Operations, Property and/or Equipment Description:

Nilpeter 13-Unit Flexographic Printing Press

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. g)(1).

For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)d.

Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (as effective 11/30/01)	Volatile Organic Compound (VOC) emissions shall not exceed 0.28 pound per hour and 1.20 tons per year from coating usage only. See b)(2)a. through b)(2)d. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(A)(3)(b) (as effective 12/01/06)	See b)(2)f.
c.	OAC rule 3745-21-09(Y)(1)	Exempt per OAC rule 3745-21-09(Y)(2)(d). See b)(2)e.
d.	OAC rule 3745-31-05(D)	See sections B.2. and B.3.

Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S. B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutant less than ten tons per year. However, that rule revision has not yet been approved by U. S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emissions limits/control measures no longer apply.

b. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the VOC content limitation and VOC emission limitation.

c. The VOC content of each coating, as applied, shall not exceed 1.5% VOC by weight of the coating.

d. The hourly emission limitation outlined for VOC is based upon the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with this limitation.

e. This facility is exempt from the requirements of OAC rule 3745-21-09(Y)(1) because the total maximum usage of VOC in all coatings and inks employed in all flexographic, packaging rotogravure, and publication rotogravure printing lines within the facility is less than or equal to 100 tons of VOC per year.

f. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The BAT requirements under OAC rule 3745-31-05(A)(3)(b) do not apply to the VOC emissions from this air contaminant source since the uncontrolled potential to emit for VOC is less than 10 tons per year.

Operational Restrictions

None.

Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information for each month for this emissions unit:

a. The name and identification number of each coating employed;

b. The VOC content of each coating, as applied, in percent by weight;

c. The number of pounds of each coating employed and;

d. The total VOC emissions from all coatings employed, which is the summation of d)(1)b. multiplied by d)(1)c. for all the coatings employed.

(2) At the end of the calendar year, the permittee shall add all the monthly VOC emissions from all coatings and fountain solution alcohol substitutes and determine the tons per year VOC emissions.

Reporting Requirements

(1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA e-Business Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

Testing Requirements

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

a. Emission Limitations:

VOC emissions shall not exceed 0.28 pound per hour and 1.20 tons per year from coatings and fountain solution alcohol substitutes.

Applicable Compliance Method:

Compliance with the hourly VOC emission limitation from coatings and fountain solution alcohol substitutes shall be determined by the following equations:

[(18.27 pounds of coatings per hour)(1.5% by wt. of the VOC content)]

= 0.28 pound of VOC per hour.

The annual ton per year VOC emission limitation from coatings is determined by multiplying the hourly emission limitation by 8760 hours of operation per year and dividing by 2000 pounds per ton conversion factor.

b. Emission Limitation:

The VOC content of each coating employed in this emissions unit shall not exceed 1.5% by weight of the coating.

Applicable Compliance Method:

Compliance with the VOC content limitations shall be based upon the record keeping requirements as specified in term d)(1). Formulation data or US EPA Method 24 shall be used to determine the VOC content of any coating and cleanup material employed in this emissions unit. If, pursuant to 40 CFR Part 60, Appendix A, an owner or an operator determines that Method 24 or 24A cannot be used for a particular adhesive or primer, the permittee shall so notify the

Administrator of the USEPA and shall use formulation data for that adhesive or primer to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

Miscellaneous Requirements

Modeling to demonstrate compliance with, the “Toxic Air Contaminant Statute”, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit’s maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified FEPTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new FEPTIO.

R009, Komori 7-Unit Press #2

Operations, Property and/or Equipment Description:

Komori 7-Unit Sheetfed Offset Lithograhic Printing Press with Flexographic Coater #2

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. g)(1).

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)d.

Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (as effective 11/30/01)	Volatile Organic Compound (VOC) emissions shall not exceed 0.88 pound per hour and 3.83 tons per year from coating and fountain solution alcohol substitute usage only. See b)(2)a. through b)(2)e. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(A)(3)(b) (as effective 12/01/06)	See b)(2)g.
c.	OAC rule 3745-21-09(Y)(1)	Exempt per OAC rule 3745-21-09(Y)(2)(d). See b)(2)f.
d.	OAC rule 3745-31-05(D)	See sections B.2. and B.3.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S. B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutant less than ten tons per year. However, that rule revision has not yet been approved by U. S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emissions limits/control measures no longer apply.

b. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the VOC content limitation and VOC emission limitation.

c. The VOC content of each coating, as applied, shall not exceed 1.5% VOC by weight of the coating.

d. The VOC content of each fountain solution alcohol substitute, as applied, shall not exceed 7.4 pounds of VOC per gallon.

e. The hourly emission limitation outlined for VOC is based upon the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with this limitation.

f. This facility is exempt from the requirements of OAC rule 3745-21-09(Y)(1) because the total maximum usage of VOC in all coatings and inks employed in all flexographic, packaging rotogravure, and publication rotogravure printing lines within the facility is less than or equal to 100 tons of VOC per year.

g. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The BAT requirements under OAC rule 3745-31-05(A)(3)(b) do not apply to the VOC emissions from this air contaminant source since the uncontrolled potential to emit for VOC is less than 10 tons per year.

Operational Restrictions

(1) None.

Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information for each month for this emissions unit:

a. The name and identification number of each coating and fountain solution alcohol substitute employed;

b. The VOC content of each coating, as applied, in percent by weight;

c. The VOC content of each fountain solution alcohol substitute, as applied, in pounds of VOC per gallon.

d. The number of pounds of each coating employed;

e. The number of gallons of each fountain solution alcohol substitute employed, and

f. The total VOC emissions from all coatings and fountain solution alcohol substitutes employed, which is the summation of d)(1)b. multiplied by d)(1)d. for all the coatings employed and the summation of d)(1)c. multiplied by d)(1)e. for all the fountain solution alcohol substitutes employed.

(2) At the end of the calendar year, the permittee shall add all the monthly VOC emissions from all coatings and fountain solution alcohol substitutes and determine the tons per year VOC emissions.

Reporting Requirements

(1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA e-Business Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

Testing Requirements

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

a. Emission Limitations:

VOC emissions shall not exceed 0.88 pound per hour and 3.83 tons per year from coatings and fountain solution alcohol substitutes.

Applicable Compliance Method:

Compliance with the hourly VOC emission limitation from coatings and fountain solution alcohol substitutes shall be determined by the following equations:

[(8.95 pounds of coatings per hour)(1.5% by wt. of the VOC content)]

= 0.14 pound of VOC per hour.

[(0.1 gallon of Fountain solution alcohol substitute per hour) (7.4 pounds of VOC per gallon)]

= 0.74 pound of VOC per hour.

0.14 pound of VOC/hour + 0.74 pound of VOC per hour = 0.88 pound of VOC/hour.

The annual ton per year VOC emission limitation from coatings and fountain solution alcohol substitutes is determined by multiplying the hourly emission limitation by 8760 hours of operation per year and dividing by 2000 pounds per ton conversion factor.

b. Emission Limitation:

The VOC content of each coating employed in this emissions unit shall not exceed 1.5% by weight of the coating and the VOC content of each fountain solution alcohol substitute shall not exceed 7.4 pounds of VOC per gallon.

Applicable Compliance Method:

Compliance with the VOC content limitations shall be based upon the record keeping requirements as specified in term d)(1). Formulation data or US EPA Method 24 shall be used to determine the VOC content of any coating and cleanup material employed in this emissions unit. If, pursuant to 40 CFR Part 60, Appendix A, an owner or an operator determines that Method 24 or 24A cannot be used for a particular adhesive or primer, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that adhesive or primer to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

Miscellaneous Requirements

(1) Modeling to demonstrate compliance with, the “Toxic Air Contaminant Statute”, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit’s maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified FEPTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new FEPTIO.