Facility ID: 0679000276 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

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

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Part II - Special Terms and Conditions

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) None.

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) None.

A. **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
Wolverine six-color flexographic printing press	OAC rule 3745-31-05(A)(3)	Emissions of VOC shall not exceed 0.7 pounds per hour or 3.1 tons per year. The requirements of this rule also include compliance with the requirements of OAC rule 3745-35-07(B).
	OAC rule 3745-35-07(B)	Emissions of total OC shall not exceed 99.0 tons during any 12-month rolling period from the entire facility, which is comprised of K001, K002, K004 and K005.
	OAC rule 3745-21-09(Y)(2)(d)	This emissions unit is exempt from the requirements of OAC rule 3745-21-09(Y)(1) pursuant to OAC rule 3745-21-09(Y)(2)(d).

2. **Additional Terms and Conditions**

   (a) The hourly and annual OC emission limitations for this emissions unit in section A.1 were established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, no record keeping and reporting requirements are necessary to demonstrate compliance with these limitations.

B. **Operational Restrictions**

1. The weight of organic material in solvent evaporated (solvent usage), which is equivalent to OC emissions, shall not exceed 99.0 tons during any 12-month rolling period from the entire facility.

   Compliance with this limitation shall be based upon a rolling, 12-month summation of facility-wide solvent usage, calculated monthly, using the following equation:

   Solvent Usage = [Summation (pounds of ink employed x solvent content of ink, in percent OC by weight) + (pounds of cleanup solvent employed) for all calendar months] x 1 ton per 2000 pounds

   The permittee has sufficient monthly records of solvent usage and OC emissions to begin calculating the rolling, 12-month summations upon final issuance of this permit.

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

1. The permittee shall collect and record the following information each month for the facility:

   a. The name and identification number of each coating and ink, as applied.

   b The OC content of each coating and ink, in percent by weight, excluding water and exempt solvents, as applied.

   c. The number of pounds (excluding water and exempt solvents) of each coating and ink employed.

   d. The name and identification of each cleanup material employed.

   e. The number of pounds of each cleanup material employed, excluding water.

   f. The total OC emissions from all coatings, inks, and cleanup materials employed, in tons.

(This information does not have to be kept on a line-by-line basis. "As applied" refers to the base coating plus all additives.)

D. **Reporting Requirements**

1. The permittee shall notify the Southeast District Office in writing of any record showing that the organic compound emissions exceeded 99.0 tons during any 12-month rolling period from the entire facility. The notification shall include a copy of such record and shall be sent to the Southeast District Office within 45 days after the exceedance occurs.

E. **Testing Requirements**

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

Emissions of VOC shall not exceed 0.7 pounds per hour.

Applicable Compliance Method:

Compliance shall be based on the following calculation, which represents the maximum rated capacity of the coating equipment using the maximum OC content coating as shown in the permit application: (1.3 gal/hr)(0.5 lb/gal) = 0.65 lb/hr.
Emission Limitation:

Emissions of VOC shall not exceed 3.1 tons per year.

Applicable Compliance Method:

The TPY emission limitation was developed by multiplying the hourly allowable emission limitation (0.7 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the short term limitation, compliance shall also be shown with the annual emission limitation.
Emission Limitation:

Emissions of total OC shall not exceed 99.0 tons during any 12-month rolling period from the entire facility.
The weight of organic material in solvent evaporated (solvent usage), which is equivalent to OC emissions, shall not exceed 99.0 tons during any 12-month rolling period from the entire facility.

Applicable Compliance Method:

Compliance shall be calculated based upon the record keeping specified in Section C.1 of this permit using the equation in Section B.1.

2. Formulation data or USEPA Method 24 shall be used to determine the OC content of the coatings and cleanup materials.

F. **Miscellaneous Requirements**

1. None