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

12/10/2013

Certified Mail

Facility ID: 1677000105
Permit Number: P0115357
County: Summit

Mr. Mark Dembinski
Bemis Company, Inc.
1972 Akron- Peninsula Rd
Akron, OH 44313

RE: FINAL AIR POLLUTION CONTROL TITLE V PERMIT
Permit Type: Minor Permit Modification

Dear Permit Holder:

Enclosed is a finalOhio Environmental Protection Agency (EPA) Air Pollution Title V permit that allows you to operate the facility in the manner indicated in the permit. Because this permit may contain several conditions and restrictions, we urge you to read it carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

How to appeal this permit

The issuance of this Title V permit is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00, made payable to “Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General’s Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
77 South High Street, 17th Floor
Columbus, OH 43215

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/survey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF 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.

If you have any questions regarding this permit, please contact the Akron Regional Air Quality Management District as indicated on page one of your permit.

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*
Akron Regional Air Quality Management District

FINAL

Division of Air Pollution Control
Title V Permit
for
Bemis Company, Inc.

Facility ID:	1677000105
Permit Number:	P0115357
Permit Type:	Minor Permit Modification
Issued:	12/10/2013
Effective:	12/10/2013
Expiration:	10/2/2017

Division of Air Pollution Control
Title V Permit
for
Bemis Company, Inc.

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Authorization

Facility ID: 1677000105
Facility Description: Paper coating & laminated, packaging.
Application Number(s): A0048654
Permit Number: P0115357
Permit Description: Title V minor permit modification to incorporate Permits to Install (PTIs): PTI P0115082 issued final on 8/20/2013; PTI P0114942 issued final on 8/22/2013; and PTI P0114941 final issued on 8/22/2013 for six flexographic printing lines (K003, K008, K010, K016, K020, and K021) and a plate making process (P010).
Permit Type: Minor Permit Modification
Issue Date: 12/10/2013
Effective Date: 12/10/2013
Expiration Date: 10/2/2017
Superseded Permit Number: P0110040

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

Bemis Company, Inc.
1972 AKRON PENINSULA RD.
AKRON, OH 44313

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

Akron Regional Air Quality Management District
146 South High Street, Room 904
Akron, OH 44308
(330)375-2480

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. 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. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Akron Regional Air Quality Management District. 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, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months and no later than 6 months prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally

Director

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions

(2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions

(3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting For State-Only Requirements

(4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(5) Standard Term and Condition A. 30.

(Authority for term: ORC 3704.036(A))

2. 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 C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

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

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) 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 recordingsfor 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:

(1) 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 by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) 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 submittedscheduled maintenancerequests, 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))

(2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions 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 submitted promptly to the Akron Regional Air Quality Management District. Except as provided below, the written reports shall be submitted 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 Standard 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 Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(3) 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 Standard Term and Condition A.2)c)(2) 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; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted to the Akron Regional Air Quality Management District 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 section B. Facility-Wide Terms and Conditions 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 Standard Term and Condition A.2.c)(2) 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))

(4) 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." Signature by the Responsible Official may be represented by entry of the personal identification number (PIN) by the Responsible Official as part of the electronic submission process or by the scanned attestation document signed by the Responsible Official that is attached to the electronically submitted written report.

(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

(5) Consistent with A.2.c.1. above, reports of any required monitoring and/or record keeping information required to be submitted to Ohio EPA shall be submitted to Akron Regional Air Quality Management District unless otherwise specified.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Reporting of Any Exceedence of a Federally Enforceable Emission Limitation or Control Requirement Resulting From 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 Standard Term and Condition A.2.c)(1) above.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

4. 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))

5. 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))

6. 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))

7. General Requirements

a) 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 permitexcept as provided pursuant to A.16 below.

c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.11 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 when:

(1) 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

(2) 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

(3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminant sources once this permit ceases to be enforceable. 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))

8. 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))

9. 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))

10. 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 standard terms and conditions shall apply to all operating scenarios authorized in this permit.

(Authority for term: OAC rule 3745-77-07(A)(10))

11. 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))

12. 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))

13. 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:

(1) 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.

(2) 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.

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

(4) 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 Akron Regional Air Quality Management District 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:

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

(2) 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 Akron Regional Air Quality Management District) and the Administrator of the U.S. EPA in the following manner and with the following content:

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

(2) Compliance certifications shall include the following:

a. Identification of each term or condition that is the basis of the certification. The identification may include a statement by the Responsible Official that every term and condition that is federally enforceable has been reviewed, and such terms and conditions with which there has been continuous compliance throughout the year are not separately identified.

b. The permittee's current compliance status.

c. Whether compliance was continuous or intermittentconsistent with A.13.d.2.a above.

d. The method(s) used for determining the compliance status of the source currently and over the required reporting period consistent with A.13.d.2.a above.

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

(3) 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))

14. 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))

15. 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 Akron Regional Air Quality Management District 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 Akron Regional Air Quality Management District 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))

16. 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))

17. 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))

18. 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 Federal Register 8314, Feb. 24, 1997), in the context of any future proceeding.

(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

Each IEU that is subject to one or more applicable requirements shall comply with those applicable requirements.

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

20. 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))

21. 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))

22. 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.

Unless otherwise exempted, noemissions unit identified in this permit that has beencertified 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)

23. 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 operating 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))

24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only

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 theAkron Regional Air Quality Management District.

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 Akron Regional Air Quality Management District. 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 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.)

25. Records Retention Requirements Under State Law Only

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.

26. 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.

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

27. Scheduled Maintenance/Malfunction Reporting For State-Only Requirements

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 Akron Regional Air Quality Management District 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).

28. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Akron Regional Air Quality Management District must be notified in writing of any transfer of this permit.

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

29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

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 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 Standard Term and Condition A.2.c)(2); 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 potential to emit; or

c) where the company's Responsible Official has certified that an emissions unit has been permanently shut down.

30. Submitting Documents Required by this Permit

All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event ofan alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the Akron Regional Air Quality

Management District, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the Responsible Official may be represented as provided through procedures established in Air Services.

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

   a) None.

2. Bemis Company, Inc. requested the following emission limitations: [The volatile organic compound (VOC) emission limitation is established to avoid Prevention of Significant Deterioration (PSD) permitting. The hazardous air pollutant (HAP) emission limitations are established to avoid being subject to the National Emission Standard for the Printing and Publishing Industry (40 CFR Part 63, Subpart KK).]

   a) The emissions of any individual HAP from all significant emissions units, combined, shall not exceed 8.5 tons per year, based upon a rolling, 12-month summation of the monthly emission rates.

   b) The emissions of combined HAPs from all significant emissions units, combined, shall not exceed 23.5 tons per year, based upon a rolling, 12-month summation of the monthly emission rates.

   c) The emissions of VOCfrom emissions units K003, K008, K010, K016 and K020, combined, shall not exceed 355.5 tons per year, based upon a rolling, 12-month summation of the monthly emission rates.

   [Authority for term: OAC rule 3745-31-05(D) and OAC rule 3745-77-07(A)(1)]

3. In order to determine compliance with the emission limitations in 2 above, the permittee shall maintain monthly records of the following information:

   a) For the printing presses:

      (1) A unique name or identification number for each ink, coating, thinning solvent and cleanup solvent used;

      (2) The VOC content of each ink, coating, thinning solvent and cleanup solvent used, in percent by weight;

      (3) The individual HAP content for each HAP of eachink, coating, thinning solvent and cleanup solvent used, in percent by weight;

      (4) For any material that is vented to the catalytic oxidizer all of the time, the total pounds of each ink, coating, thinning solvent and cleanup solvent used;

      (5) For any material that is vented to atmosphere either all of the time or part of the time, keep the following records on a by station basis;

         a. The total pounds of each ink, coating, thinning solvent and cleanup solvent used on a station with emissions controlled by the catalytic oxidizer;

         b. The total pounds of each ink, coating, thinning solvent and cleanup solvent used on a station with emissions vented directly to atmosphere;

(6) A unique name or identification number for each type of waste collected for disposal;

(7) The VOC content of each type of waste collected for disposal, in percent by weight;

(8) The total pounds of each type of waste collected for disposal;

(9) The linear feet produced by each printing press; and

(10) The total linear feet produced by all of the printing presses combined.

These records may be kept on a line by line basis or for the materials that are always controlled by the catalytic oxidizer the amount assigned to each line may be estimated based on the ratio of the linear feet produced on a given printing press divided by the total linear feet produced by all of the printing presses combined.

b) For platemaking:

(1) The total pounds of film cleaning materials used;

(2) The total pounds of plate wash materials used;

(3) The total pounds of plate wash material returned for reclamation;

(4) The individual HAP content for each HAP of each film cleaning material used, each plate wash material used and each plate wash material returned for reclamation, in percent by weight.

c) Each month the permittee shall calculate and record data sufficient to demonstrate compliance with the emission limitations contained in 2 above. The permittee shall maintain the following monthly records:

(1) The individual HAP emissions* for each HAP, in ton(s) per month**, for all significant emissions units, combined;

(2) The individual HAP emissions* for each HAP for the last 12-month period for all significant emissions units, combined;

(3) The combined HAP emissions*, in tons per month**, for all significant emissions units, combined;

(4) The combined HAP emissions* for the last 12-month period for all significant emissions units, combined;

(5) For each emissions unit, the calculated actual VOC emission rate in tons per month**; and

(6) The VOC emissions for the last 12-month period for emissions units K003, K008, K010, K016 and K020, combined.

*The emissions can be based on pre-control “usage” records when those numbers are low enough to demonstrate compliance.

**The permittee may take into account any quantifiable HAP and/or VOC retained in waste as well as the emissions unit's overall control efficiency in making these calculations. The overall control efficiency incorporated into the calculations must be the efficiency determined during the most recent emission test that demonstrated the emissions unit was in compliance.

[Authority for term: OAC rule 3745-31-05(D) and OAC rule 3745-77-07(C)(1)]

4. The permittee shall submit quarterly deviation (excursion) reports that identify the following:

   a) All exceedances of the rolling, 12-month emission limitation for VOC;

   b) All exceedances of the rolling, 12-month emission limitation for any individual HAP; and

   c) All exceedances of the rolling, 12-month emission limitation for combined HAPs.

   The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

   [Authority for term: OAC rule 3745-31-05(D) and OAC rule 3745-77-07(C)(1)]

5. Compliance with the emission limitations in 2 above shall be determined in accordance with the following methods:

   a) Emission Limitations:

      The emissions of any individual HAP from all significant emissions units, combined, shall not exceed 8.5 tons per year, based upon a rolling, 12-month summation of the monthly emission rates.

      The emissions of combined HAPs from all significant emissions units, combined, shall not exceed 23.5 tons per year, based upon a rolling, 12-month summation of the monthly emission rates.

      The emissions of VOCfrom emissions units K003, K008, K010, K016 and K020, combined, shall not exceed 355.9 tons per year, based upon a rolling, 12-month summation of the monthly emission rates.

      Applicable Compliance Method:

      Compliance with the annual allowable emission limitations above shall be demonstrated through the record keeping requirements established in 3.a), 3.b) and 3.c) above.

      When required, formulation data or U.S. EPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the VOC contents of the coatings and inks. Formulation data shall be used to determine the HAP contents of the coatings, inks and solvents.

   [Authority for term: OAC rule 3745-31-05(D) and OAC rule 3745-77-07(C)(1)]

6. When required by a term and condition in Section C below to utilize a catalytic oxidizer to control emissions, the catalytic oxidizer shall be operated in accordance with the following:

a) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the temperature immediately upstream and downstream of the oxidizer's catalyst bed when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Temperature units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within ± 1 percent of the temperature being measured or ± 5 degrees Fahrenheit, whichever is greater. The temperature monitors and recorder(s) shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:

a. All 3-hour blocks of time, when the emissions unit(s) controlled by the catalytic oxidizer was/were in operation, during which the average temperature of the exhaust gases immediately before the catalyst bedwas less than 554 degrees Fahrenheit or was more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance;

b. All 3-hour blocks of time, when the emissions unit(s) controlled by the catalytic oxidizer was/were in operation, during which the average temperature difference across the catalyst bed was less than 12.8 degrees Fahrenheit or was less than 80 percent of the average temperature difference measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance; and

c. A log of operating time for the capture (collection) system, catalytic oxidizer, monitoring equipment, and the associated emissions unit(s). The permittee may use the current temperature chart as the log documenting that the monitoring equipment and control device are operating. Bypass of the collection system by the emissions unit(s) shall be logged as to the date and time.

The permittee may use a temperature chart recorder or equivalent recording device as the log that documents the temperature differential across the catalyst bed. These records shall be maintained at the facility for a period of no less than 3 years.

[Authority for term: OAC rule 3745-21-09(B)(3)(l), OAC rule 3745-21-09(B)(3)(n), OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.3]

(2) Whenever the monitored average temperature of the exhaust gases immediately before the catalyst bed deviates from the range or limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. The date and time the deviation began;

b. The magnitude of the deviation at that time;

c. The date the investigation was conducted;

d. The name(s) of the personnel who conducted the investigation; and

e. The findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range(s)/limit(s) specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. A description of the corrective action;

g. The date corrective action was completed;

h. The date and time the deviation ended;

i. The total period of time (in minutes) during which there was a deviation;

j. The temperature of the exhaust gases immediately before the catalyst bedafter the corrective action was implemented; and

k. The name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.3]

(3) The catalytic oxidizer shall be operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals,including any modifications deemed necessary by the permittee. The catalyst conversion efficiency shall be evaluated and compared to typical values for fresh catalyst. Any findings that the conversion efficiency is beyond the operational range of the catalyst, as defined by the manufacturer, is not necessarily indicative of an emission violation but rather serves as a trigger level for maintenance and/or repair activities, or further investigation to establish proper operation of the catalytic oxidizer. Solvent loading during the catalyst analysis shall be consistent with the test laboratory's normal testing protocol.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.3]

(4) The permittee shall perform an inspection of the catalytic oxidizer, including the catalyst bed, on at least an annual basis. Each inspection shall consist of internal and visual inspections in accordance with the manufacturer's recommendations, as specified in the document entitled "Recommended Annual Inspection Points and Procedures" as submitted to the Ohio EPA on February 26, 2002 or as revised by the manufacturer, and shall include a physical inspection of the unit and checks of associated equipment, including but not limited to burners, controls, dampers, valves, and monitoring and

recording equipment. Revisions to the "Recommended Annual Inspection Points and Procedures" document shall be submitted to the Akron Regional Air Quality Management District for review prior to implementation. Repair and replacement of equipment shall be performed as determined by the inspection. In accordance with the testing schedule in c)(1) below, a sample of catalyst material shall be collected from the catalyst bed to perform the catalyst activity tests required in c)(1) below. The permittee shall also perform weekly inspections of the external integrity of the catalytic oxidizer.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 64.7(c) and 40 CFR Part 64.9(b)]

(5) The permittee shall maintain a record of the results of each annual and weekly inspection of the catalytic oxidizer, as well as the results of each catalyst activity test required in c)(1) below.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 64.7(c) and 40 CFR Part 64.9(b)]

(6) The compliance assurance monitoring (CAM) plan for emissions units K003, K008, K010, K016, K020 and K021 has been developed for VOC emissions. The CAM performance indicators for the catalytic oxidizer controlling these emissions units include the average temperature of the exhaust gases immediately before the catalyst bed and the catalyst activity testing. When the performance indicators are operating outside the indicator ranges, the permittee shall take corrective action to restore operation of the control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions and complying with the reporting requirements specified in b) below. The control equipment shall be run in accordance with the approved CAM plan, or any approved revision of the plan. The permittee also has an inspection/preventative maintenance program for the catalytic oxidizer. Based on the results of the inspection/preventative maintenance program, repairs to the catalytic oxidizer shall be made as needed. If the current CAM indicators and/or the catalytic oxidizer system inspection/preventative maintenance program are considered inadequate, the permittee will develop a Quality Improvement Plan.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Parts 64.6(d) and 64.7]

b) Reporting Requirements

(1) The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of the emissions unit(s):

a. All 3-hour blocks of time (when required by a term and condition in Section C to utilize a catalytic oxidizer to control emissions) during which the average temperature of the exhaust gases immediately before the catalyst bed (as determined by the continuous temperature monitor) was less than 554 degrees Fahrenheit or was more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance;

b. All 3-hour blocks of time (when required by a term and condition in Section C to utilize a catalytic oxidizer to control emissions) during which the average temperature difference across the catalyst bed was less than 12.8 degrees Fahrenheit or was less than 80 percent of the average temperature difference measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance;

c. A summary of the operating time for the capture (collection) system, catalytic oxidizer, monitoring equipment and the emissions unit(s);

d. An identification of each incident of deviation described in b)(1)a. above where a prompt investigation was not conducted;

e. An identification of each incident of deviation described in b)(1)a. above where prompt corrective action, that would bring the average temperature of the exhaust gases immediately before the catalyst bed into compliance with the acceptable value, was determined to be necessary and was not taken; and

f. An identification of each incident of deviation described in b)(1)a. above where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted by April 30, July 31, October 31 and January 31, and shall cover the records for the previous calendar quarters.

[Authority for term: OAC rule 3745-21-09(B)(3)(m), OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.9(a)]

NOTE: Information submitted pursuant to b)(1)b. above is not relevant for determining compliance with any operational restrictions and monitoring and record keeping contained in a) above.

(2) The permittee shall submit reports that include the results of the catalyst activity tests required in c)(1) below. These reports shall be submitted within 45 days after each catalyst activity test is performed.

[Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.9(a)]

(3) The permittee shall submit quarterly reports that include a description of any repairs, maintenance and/or further investigation taken to ensure the proper operation of the catalytic oxidizer. These quarterly reports shall be submitted by April 30, July 31, October 31 and January 31, and shall cover the records for the previous calendar quarters.

[Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.9(a)]

(4) The permittee shall submit quarterly deviation (excursion) reports that identify the findings of any inspection that determined the external structural integrity of the catalytic

oxidizer has been jeopardized and it no longer operates as designed. These quarterly reports shall be submitted by April 30, July 31, October 31 and January 31, and shall cover the records for the previous calendar quarters.

[Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.9(a)]

(5) The permittee shall submit annual reports that summarize the results of each annual inspection of the internal integrity of the catalytic oxidizer, based on records maintained pursuant to a)(4) above. These reports shall be submitted within 45 days after each inspection is performed.

[Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-77-07(C)(1), and 40 CFR Part 64.9(a)]

c) Testing Requirements

(1) The permittee shall conduct, or have conducted, catalyst activity testing using the catalyst sample collected during the annual inspection described in a)(4) above. An intent to test notification shall not be required for the testing noted in this term. The procedures for the catalyst activity test shall be in accordance with the manufacturer's recommendations.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

(2) The permittee shall conduct, or have conducted, emission testing for the catalytic oxidizer in accordance with the following requirements:

a. The emission testing shall be conducted within 6 months prior to permit expiration.

b. The emission testing shall be conducted to demonstrate compliance with the 90 and 95 percent, by weight control (destruction) efficiency limitations for VOC.

c. The control (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 aconsideration of the potential presence of interfering gases.

d. The test(s) shall be conducted while the emissions units that are vented to the catalytic oxidizer are operating at or near their maximum capacities, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

e. During each control (destruction) efficiency test run, the permittee shall measure the following:

i. The temperature of the exhaust gases immediately before the catalyst bed, in degrees Fahrenheit; and

ii. The temperature difference across the catalyst bed, in degrees Fahrenheit.

[Authority for term: OAC rule 3745-21-10(C), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(C)(1)]

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

[Authority for term: OAC rule 3745-21-10(A), OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

(4) 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 necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

(5) A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency 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 3745-21-10(A), OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

7. Pursuant to 40 CFR Part 64, the permittee has submitted and the Ohio EPA has approved a CAM plan for emissions units K003, K008, K010, K016, K020 and K021. The permittee shall comply with the provisions of the plan during any operation of the aforementioned emissions unit.

[Authority for term: 40 CFR Part 64]

C. Emissions Unit Terms and Conditions

1. P010, Plate Making

Operations, Property and/or Equipment Description:

Photopolymer Plate Making Process - Plate Making

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) g)(1).

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.	OAC rule 3745-31-05(A)(3)	The emissions of volatile organic compounds (VOC) shall not exceed 9.9 tons per year, based upon a rolling, 12-month summation of the monthly emissions.
b.	OAC rule 3745-31-05(D) (synthetic minor to avoid MACT applicability under 40 CFR Part 63, Subpart KK)	See 2, 3, 4 and 5 of Section B. Facility-Wide Terms and Conditions.
c.	OAC rule 3745-21-07(M)(4)	The emissions of organic compounds (OC) shall be reduced by at least 85 percent, by weight. 90 percent or more of the carbon in the organic material being incinerated shall be oxidized to carbon dioxide.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The VOC emissions from the plate wash-out unit, plate dryer(s) and anti-tack post exposure unit(s) shall be vented to the catalytic oxidizer when any of these pieces of equipment are in operation.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain records documenting any time periods when any piece of equipment listed in c)(1) above was/were in operation and the emissions were not vented to the catalytic oxidizer.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

(2) All exhaust fans associated with the equipment listed in c)(1) above shall be in operation at all times when the equipment is in operation.

[Authority for term: OAC rule 3745-77-07(A)(1)]

(3) All bypass dampers shall be in the correct position and in good operating condition at all times when the equipment listed in c)(1) above is/are in operation to ensure that all captured VOC emissions are vented to the catalytic oxidizer. Also, all the hooding and ductwork comprising the VOC emission capture system for the equipment listed in c)(1) above shall be free of leaks and holes that would permit the escape of the captured VOC emissions.

[Authority for term: OAC rule 3745-77-07(A)(1)]

(4) Each calendar month the permittee shall inspect the operational condition and integrity of the following for the equipment listed in c)(1) above:

a. Each exhaust fan comprising the capture system. Exhaust fan observations shall include visual inspections of the fan belts. Lubrication of bearings and replacement of parts shall occur as necessary.

b. All hooding, ductwork, and bypass dampers comprising the capture system. Hooding and ductwork observations shall include visual inspections for leaks or holes. Bypass damper observations shall include visual inspections to verify that the damper setting is in the correct position (i.e., to the catalytic oxidizer) and visual inspections of the actuator and motor to verify that the actuator pin and the motor are operating properly.

The permittee shall document the results of all monthly inspections, including any corrective actions taken.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(5) The permittee shall maintain the following information for this emissions unit on a monthly basis:

a. The total pounds of film cleaning materials used (from 3.b)(1) in Section B. Facility-Wide Terms and Conditions);

b. The total pounds of plate wash materials used (from 3.b)(2) in Section B. Facility-Wide Terms and Conditions);

c. The total pounds of plate wash material returned for reclamation (from 3.b)(3) in Section B. Facility-Wide Terms and Conditions); and

d. The VOC content of each film cleaning material used, each plate wash material used and each plate wash material returned for reclamation, in percent by weight.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

(6) Each month the permittee shall calculate and record the VOC emissions for the previous month as well as the summation of the VOC emissions for the previous 12-month period.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

(7) For the monitoring and/or record keeping requirements for the catalytic oxidizer, see 6.a)(1) through (5) in Section B. Facility-Wide Terms and Conditions.

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports that identify any time periods when any piece of equipment listed in c)(1) above was/were in operation and the emissions were not vented to the catalytic oxidizer. Each report shall be submitted within 30 days after the deviation occurs.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

(2) The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for VOC. The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

(3) The permittee shall submit quarterly (excursion) deviation reports that identify the following:

a. Each time any bypass dampers are not in the correct position that would permit the escape of the captured VOC emissions and

b. Each time the findings of any inspection that determined the integrity of any exhaust fan, hooding, ductwork, bypass damper, and/or associated actuator pins and motors has compromised the capture system.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(4) For the reporting requirements for the catalytic oxidizer, see 6.b)(1) through (5) in Section B. Facility-Wide Terms and Conditions.

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:

The emissions of OC shall be reduced by at least 85 percent, by weight.

Applicable Compliance Method:

If required, compliance with the allowable overall control efficiency limitation above shall be demonstrated based upon destruction testing using the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA (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.) and capture testing using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the U.S. EPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable.)

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

90 percent or more of the carbon in the organic material being incinerated shall be oxidized to carbon dioxide

Applicable Compliance Method:

If required, compliance with the allowable control efficiency limitation above shall be demonstrated based upon destruction testing using the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA (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.).

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

c. Emission Limitation:

The emissions of VOC shall not exceed 9.9 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance with the annual allowable VOC limitation above shall bedemonstrated based upon the record keeping requirements established in d)(5) and d)(6) above.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(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 permittees to apply for and obtain a new or modified Permit to Install (PTI) 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 PTI.

(2) Bemis Company, Inc. shall provide a copy of this permit to the owner/operator of this emissions unit. The owner/operator of this emissions unit shall have the permit available in the plate making room. The owner/operator of the plate making room shall provide Bemis Company, Inc. with all information necessary to perform the monthly monitoring and/or record keeping requirements of this permit.

(3) The owner/operator of this emissions unit shall notify Bemis Company, Inc. prior to installing any new equipment. If required, Bemis Company, Inc. shall apply for and obtain a new or modified PTI prior to the installation of the new equipment. If no permit is required, Bemis Company, Inc. shall notify Akron Regional Air Quality Management District of the equipment being installed by providing an update list of equipment that is included in this emissions unit.

2. Emissions Unit Group -Flexographic Printing Presses: K003,K008,K010,K016,K020,K021,

EU ID	Operations, Property and/or Equipment Description
K003	flexographic printing press with in-line gravure station and three natural gas-fired ovens - W & H 1
K008	flexographic printing press with in-line gravure station and three natural gas-fired ovens - W & H 2
K010	flexographic printing press with in-line gravure and flexo stations and three natural gas-fired ovens - W & H 3
K016	flexographic printing press with in-line flexo station and three natural gas-fired ovens- PC VISION
K020	flexographic printing press with in-line gravure and flexo stations and three natural gas-fired ovens - W & H 5
K021	flexographic printing press with in-line gravure and flexo stations and three natural gas-fired ovens - Vision 2.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) g)(1).

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.	OAC rule 3745-31-05(A)(3)	The emissions of volatile organic compounds (VOC) from emissions unit K008 which includes the central impression (CI) station and in-line gravure station shall not exceed 85.0 pounds perhour. The emissions of VOC from emissions unit K010 which includes the CI station and in-line gravure and flexo stations shall not exceed 222.0 pounds per hour. The emissions of VOC from emissions unit K016 which includes the CI station and in-line flexo station shall not exceed 34.0 pounds per hour.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		The emissions of VOC from emissions unit K020 which includes the CI station and in-line gravure and flexo stations shall not exceed 124.0 pounds per hour. The emissions of VOC from emissions unit K021 which includes the CI station and in-line gravure and flexo stations shall not exceed 16.22 pounds per hour. See b)(2)a. below. The emissions of VOC from emissions unit K008 which includes the CI station and in-line gravure station shall not exceed 109 tons per year. The emissions of VOC from emissions unit K010 which includes the CI station and in-line gravure and flexo stations shall not exceed109tons per year. The emissions of VOC from emissions unit K016 which includes the CI station and in-line flexo station shall not exceed 109 tons per year. The emissions of VOC from emissions unit K020 which includes the CI station and in-line gravure and flexo stations shall not exceed109tons per year. For each station of emissions units K008, K010 and K016: the station shall either be equipped with a capture system and associated control system which are designed and operated to achieve a control (destruction) efficiency which is at least 90 percent by weight and a capture efficiency which is at least 78 percent by weight for VOC or the VOC content of thecoatings andinks employed shall not exceed the following: i. forty percent VOC by volume of the coating and ink, excludingwater and

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		exempt solvents; or ii. twenty-five percent VOC by volume of the volatile matter in thecoating and ink. For each station of emissions unit K020: the station shall either be equipped with a capture system andassociated control system which are designed and operated toachieve a control (destruction) efficiency which is at least 90 percent byweight and a capture efficiency which is at least 90 percent byweight for VOC, or the VOC content of thecoatings andinks employed shall not exceed the following: i. forty percent VOC by volume of the coating and ink, excludingwater and exempt solvents; or ii. twenty-five percent VOC by volume of the volatile matter in thecoating and ink. For each station of emissions unit K021: the station shall either be equipped with a capture system andassociated control system which are designed and operated toachieve a control (destruction) efficiency which is at least 95 percent byweight and a capture efficiency which is at least 90 percent byweight for VOC, or the VOC content of thecoatings andinks employed shall not exceed the following: i. forty percent VOC by volume of the coating and ink, excludingwater and exempt solvents; or ii. twenty-five percent VOC by volume of the volatile matter in thecoating and ink. See c)(1) and c)(2) below.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(D) (synthetic minor to avoidPSD permitting, nonattainment NSR and MACT applicability under 40 CFR Part 63, Subpart KK)	For avoiding nonattainment NSR, the emissions of VOC from emissions unit K021 which includes the CI station and in-line gravure and flexo stations shall not exceed 22.0 tons per year, based upon a rolling, 12-month summation of the monthly emissions. For avoiding MACT applicability and PSD permitting, see 2, 3, 4 and 5 of Section B. Facility-Wide Terms and Conditions.
c.	OAC rule 3745-21-09(Y)(1)(a)	For emissions units K008, K010, K016, K020 and K021, the emission limitations specified by this rule are equivalent to the emission limitations establishedpursuant to OAC rule 3745-31-05(A)(3). For each station of emissions unit K003 when venting to the atmosphere, the VOC content of thecoatings andinks employed shall not exceed the following: i. forty percent VOC by volume of the coating and ink, excludingwater and exempt solvents; or ii. twenty-five percent VOC by volume of the volatile matter in thecoating and ink.
d.	OAC rule 3745-21-09(Y)(1)(b)	For emissions units K008, K010, K016, K020 and K021, the emission control requirementsspecified by this rule are less stringent than or equivalent tothe emission control requirements established pursuantto OAC rule 3745-31-05(A)(3). When a station of emissions unit K003 is employing any ink or coating that does not met OAC rule 3745-21-09(Y)(1)(a) and (Y)(4)(a)(ii), the station shall be equipped with a capture system and associated control system which are designed and operated to achieve a control (destruction) efficiency which is at

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		least 90 percent, by weight, and a capture efficiency which is at least 65 percent, by weight.
e.	OAC rule 3745-21-09(Y)(4)(a)(i)(a)	For emissions units K008 and K010, the emission control requirement specified by this rule is less stringent than the emission control requirements established pursuantto OAC rule 3745-31-05(A)(3). When a station of emissions unit K003 is employing any ink or coating that does not met OAC rule 3745-21-09(Y)(1)(a) and (Y)(4)(a)(ii), the station shall employ a control system to reduce VOC emissions by 65 percent overall control.
f.	OAC rule 3745-21-09(Y)(4)(a)(i)(c)	For emissions units K020 and K021, the emission control requirement specified by thisrule is less stringent than the emission control requirements established pursuantto OAC rule 3745-31-05(A)(3). When a station of emissions unit K016 is employing any ink or coating that does not met OAC rule 3745-21-09(Y)(1)(a) and (Y)(4)(a)(ii), the station shall employ a control system to reduce VOC emissions by 75 percent overall control.
g.	OAC rule 3745-21-09(Y)(4)(a)(ii)	For each station of emissions units K003, K008, K010, K016, K020 and K021 when venting to the atmosphere: The VOC content of the coatings and inks employed shall not exceed 0.8 pound of VOC per pound of solids applied or 0.16 pound of VOC per pound of coating or ink applied. The VOC content limits specified above can be met by averaging theVOCcontent of materials used on a single press, within a singleprinting line.
h.	OAC rule 3745-21-09(Y)(4)(b)	Any facility that uses VOC-containing cleanup materials shall ensure that VOC emissions are minimized by incorporating the following procedures: Keep cleaning materials and used shop

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		towels in closed containers; and Convey cleaning materials from one location to another in closed containers or pipes.

(2) Additional Terms and Conditions

a. The hourly VOC emission limitations are based on the emissions unit's potential to emit. Therefore, no record keeping or reporting is required to demonstrate compliance with these emission limitations.

c) Operational Restrictions

(1) For each station of emissions units K003, K008, K010, K016, K020 and K021: When employing any coating or ink on one of these stations that does not meet the requirements of OAC rules 3745-21-09(Y)(1)(a) and (Y)(4)(a)(ii), the VOC emissions from the station shall be vented to the catalytic oxidizer.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]

(2) For each station of emissions units K003, K008, K010, K016, K020 and K021: When all coatings or inks employed on a station meet the requirements of OAC rules 3745-21-09(Y)(1)(a) and (Y)(4)(a)(ii), the VOC emissions from the station may be vented to the atmosphere.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain records documenting any time periods when a station of emissions units K003, K008, K010, K016, K020 and K021 was in operation and the emissions from the station was not vented to the catalytic oxidizer. The only exception to this requirement is when a station is operating as allowed by c)(2) above.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

(2) The stations of emission unitsK003, K008, K010, K016, K020 amd K021 shall be operated with an interlock system that prevents their operation unless the catalytic oxidizer is in operation and emissions are being exhausted to the catalytic oxidizer. The only exceptionto this requirement is when a station is operating as allowed by c)(2) above.

[Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-77-07(A)(1) and 40 CFR Part 64.3]

(3) All exhaust fans associated with active stations of the emissions units listed above shall be in operation at all times when the station is in operation. The only exceptionto this requirement is when a station is operating as allowed by c)(2) above.

[Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-77-07(A)(1) and 40 CFR Part 64.3]

(4) All bypass dampers shall be in the correct position and in good operating condition at all times when the stations of the emissions units listed above are in operation to ensure that all captured VOC emissions are vented to the catalytic oxidizer. Also, all the hooding and ductwork comprising the VOC emission capture system for the stations of the emissions units listed above shall be free of leaks and holes that would permit the escape of the captured VOC emissions. The only exceptionto this requirement is when the station is operating as allowed by c)(2) above.

Note: It is not a deviation if an incorrect position does not cause excess emissions (i.e., emissions not required to be controlled are ducted to the catalytic oxidizer, station is not in use, etc.)

[Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-77-07(A)(1) and 40 CFR Part 64.3]

(5) On an annual basis, the permittee shall inspect the interlock system used for the emissions units listed above to verify the signals between the catalytic oxidizer and the emissions unit are functioning properly. The permittee shall document the results of all annual inspections. An excursion is defined as a finding that the interlock is inoperative. Any excursion shall require that the emissions unit be immediately shut down and remain shut down until the problem has been corrected. The only exception to this requirement is when a station is operating as allowed by c)(2) above for the entire calendar year.

[Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-77-07(C)(1), 40 CFR Part 64.3, 40 CFR Part 64.7(c) and 40 CFR Part 64.9(b)]

(6) Capture System

a. For Active Printing Station(s): For each printing station of the emissions units listed above, the permittee shall continuously monitor an indicator of dryer exhaust, while the printing station is in operation and exhaust is being directed to the catalytic oxidizer. This can be accomplished by monitoring the electrical state of the dryer pressure safety switch (either on or off). Monitoring data shall be recorded at least four (4) times per hour by an electronic data acquisition system or chart recorder. Printing stations that are currently inactive shall establish the appropriate monitoring within 6 months of the printing station again becoming operational.

The machine section shall be interlocked to shut down whenever the monitored pressure switch indicates there isn't air flow for more than two (2) consecutive minutes. The permittee shall promptly investigate the cause of any activation of this interlock or a finding that the interlock is inoperable. The permittee shall

maintain records of the following information for each investigation: the date and time the interlock was activated, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

Prior to restarting the emissions unit, the permittee shall take corrective action to repair the cause of the failure. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, and the names of the personnel who performed the work.

Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

b. For Active Printing Station(s) with one piece (i.e. adjustable position) dryers: On May 16, 2013, the permittee employed smoke sticks or an equivalent approach to determine whether or not each printing station dryer was negative with respect to the surrounding atmosphere. A re-verification of the printing station dryer's flow shall be performed after any equipment maintenance or adjustment to the printing station and/or dryer which disrupts the position of the dryer. The permittee shall record the following for each verification: the date performed, the identification of the printing station being verified, the name(s) of the personnel doing the verification, the findings of the verification procedure (smoke sticks or other), and a description of the corrective action if the verification found the dryer flow to be positive to the surrounding atmosphere. The process may not be operated until all tested dryers have been verified to be negative to the surrounding atmosphere.

Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

c. For Active Printing Station(s) with nonadjustable position dryers:On May 16, 2013, the permittee employed smoke sticks or an equivalent approach to determine whether or not each printing station dryer was negative with respect to the surrounding atmosphere. The permittee recorded the following for theverification: the date performed, the identification of the printing station being verified, the name(s) of the personnel doing the verification, the findings of the verification procedure (smoke sticks or other), and a description of the corrective action if the verification found the dryer flow to be positive to the surrounding atmosphere. The process may not be operated until all tested dryers have been verified to be negative to the surrounding atmosphere.

Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

d. For Active Coating Station(s): For each coating station of the emissions units listed above, the permittee shall continuously monitor an indicator of flow of the

coating station's exhaust, while the coating station is in operation and exhaust is being directed to the catalytic oxidizer. This can be accomplished by either monitoring the static pressure or by a direct measurement of flow. The measurement method shall be capable of accurately measuring the desired parameter and shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee. Monitoring data shall be recorded at least four (4) times per hour by an electronic data acquisition system or chart recorder. Coating stations that are currently inactive or currently only vent to atmosphere as allowed by c)(2) above shall establish the appropriate monitoring parameter within 6 months of the coating station again becoming operational or again employing coatings that do not meet the requirements of OAC rules 3745-21-09(Y)(1)(a) and (Y)(4)(a)(ii).

Whenever the monitored value for the static pressure or air flow rate at the outlet of thecoating station deviates from the value specified below for more than five (5) consecutive minutes, the permittee shall promptly investigate the cause of the deviation.The permittee shall maintain records of the following information for each investigation:the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation, the permittee shall take prompt corrective action to determine the cause of the deviation and to bring the operation of the capture (collection) system within the acceptable value specified below. The permittee shall maintain records of the following information for each corrective action taken:a description of the corrective action, the date it was completed, the date and time the deviation ended, the air flow rate indicator value from thecoating station measured both before and after the corrective action, and the names of the personnel who performed the work.

Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

An acceptable value for the indicator of flow of the coating station's exhaust, while the coating station of the emissions unit is in operation and exhaust is directed to the catalytic oxidizer can be no less than eighty-five percent of the average value measured during the most recent emission test that demonstrated the emissions unit was in compliance.

[Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-77-07(C)(1), 40 CFR Part 64.3, 40 CFR Part 64.7(c) and 40 CFR Part 64.9(b)]

(7) Each calendar month, during which a station of the emissions units listed above are operated with the exhaust directed to the catalytic oxidizer, the permittee shall inspect the operational condition and integrity of the following for that station:

a. Each exhaust fan comprising the capture system. Exhaust fan observations shall include visual inspections of the fan belts. Lubrication of bearings and replacement of parts shall occur as necessary.

b. All hooding, ductwork, and bypass dampers comprising the capture system. Hooding and ductwork observations shall include visual inspections for leaks or holes. Bypass damper observations shall include visual inspections to verify that the damper setting is in the correct position (i.e., to the catalytic oxidizer or to atmosphere) and visual inspections of the actuator and motor to verify that the actuator pin and the motor are operating properly.

The permittee shall document the results of all monthly inspections, including any corrective actions taken.

[Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-77-07(C)(1), 40 CFR Part 64.7(c) and 40 CFR Part 64.9(b)]

(8) The permittee shall collect and record the following information each month for the inks or coatings employed on the stations that are vented to the atmosphere:

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

b. The VOC content in percentage VOC by volume of each coating and ink (excluding water and exempt solvents); or

c. The VOC content in percentage VOC by volume of the volatile matter in each coating and ink; and

d. The VOC content in pound of VOC per pound of coating or ink applied; or

e. TheVOC content in pound of VOC per pound of solids applied.

(If the permittee mixes complying inks or coatings that individually comply with the VOC content limitations in b)(1)a. and b)(1)g. above, it is not necessary to record the VOC content of the resulting mixture.)

[Authority for term: OAC rule 3745-21-09(B)(3)(f), OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

(9) When the data recorder indicates that a station is vented to atmosphere and in operation, the permittee shall maintain the following information:

a. The date;

b. The emissions unit and station identification; and

c. Confirmation that the coating being employed complies with b)(1)a. or b)(1)c. and b)(1)g. above.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

(10) Each month the permittee shall calculate and record the VOC emissions for the previous month for each emissions unit listed above as well as the summation of the VOC emissions for the previous 12-month period, in ton(s) for emissions unit K021.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

(11) For the monitoring and/or record keeping requirements for the catalytic oxidizer, see 6.a)(1) through (5) in Section B. Facility-Wide Terms and Conditions.

(12) The compliance assurance monitoring (CAM) plan for the emissions units listed above has been developed for VOC emissions. The CAM performance indicators for the emissions unit listed above include an indicator of flow of the coating and printing stations' exhausts and an interlock system. When the performance indicators are operating outside the indicator ranges, the permittee shall take corrective action to restore operation of the emissions units listed above to their normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions and complying with the reporting requirements specified in e) below. The emissions units listed above shall be run in accordance with the approved CAM plan, or any approved revision of the plan. If the current CAM indicators are considered inadequate, the permittee will develop a Quality Improvement Plan.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Parts 64.6(d) and 64.7]

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports that identify any time periods when a station of the emissions units listed above was in operation and the emissions from the station were not vented to the catalytic oxidizer (i.e., noncomplying coating venting to atmosphere). The only exception to this requirement is when a station is operating as allowed by c)(2) above. Each report shall be submitted within 30 days after the deviation occurs.

[Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-21-09(B)(3)(g) and OAC rule 3745-77-07(C)(1)]

(2) The permittee shall submit quarterly (excursion) deviation reports that identify the following:

a. Each time the interlock system does not stop the operation of any station when the catalytic oxidizer is not in operation or is being bypassed and its use is necessary to be in compliance;

b. Each time any bypass dampers are not in the correct position that would permit the escape of the captured VOC emissions;

Note: It is not a deviation and does not need reported if an incorrect position does not cause excess emissions (i.e., emissions not required to be controlled are ducted to the catalytic oxidizer, station is not in use, etc.)

c. Each time the findings of any inspection that determined the integrity of any exhaust fan, hooding, ductwork, bypass damper, and/or associated actuator pins and motors has compromised the capture system;

d. All exceedances of the rolling, 12-month emission limitation for VOC for emissions unit K021;

e. Each period of time, during operation of the station(s), when the monitored flow indicator indicates that there isn't air flow for any of the printing stations;

f. Each period of time, during operation of the station(s), when the static pressure or air flow rate was less than the acceptable value for any of the coating stations; and

g. Each incident of deviation described in (e) or (f) where a prompt investigation was not conducted; where prompt corrective actionwas determined to be necessary and was not taken or where proper records were not maintained for the investigation and/or the corrective action.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-77-07(C)(1), and 40 CFR Part 64.9(a)]

(3) The permittee shall submit annual reports that specify the results of the annual interlock system inspection for the emissions units listed above based on the records maintained pursuant to d)(5) above. These reports shall be submitted within 45 days after each inspection is performed.

[Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-77-07(C)(1), and 40 CFR Part 64.9(a)]

(4) For the reporting requirements for the catalytic oxidizer, see 6.b)(1) through (5) in Section B. Facility-Wide Terms and Conditions.

f) Testing Requirements

(1) The permittee shall conduct, or have conducted, emission testing for each station of the emissions units listed above in accordance with the following requirements:

a. For Coating Station(s): On June 26 to 29, 2012 emission testing was conducted to demonstrate compliance with the capture efficiency limitation and to establish the appropriate operating parameter to ensure the capture efficiency in b)(1) above is maintained unless the specific coating station to be tested is not being operated or only employs coatings that meet the requirements of OAC rules 3745-21-09(Y)(1)(a) and (Y)(4)(a)(ii) (see b. below).

b. Any testing required by a. above may be delayed for coating stations that are not operated during the established testing time frame. In this case capture efficiency testingshall be conducted to demonstrate compliance with the capture

efficiency limitation and to establish the appropriate operating parameter to ensure the capture efficiency in b)(1) within 6 months of the coating station again becoming operational or again employing coatings that do not meet the requirements of OAC rules 3745-21-09(Y)(1)(a) and (Y)(4)(a)(ii).

c. The emission testing to demonstrate compliance with the capture efficiency limitations were conducted as follows:

i. The CI station of emissions unit K003demonstrated compliance with the 65 percent, by weight, capture efficiency limitation for VOC on June 26, 2012;

ii. The CI station of emissions unit K008demonstrated compliance with the 78 percent, by weight, capture efficiency limitation for VOC on June 27, 2012;

iii. The CI station of emissions unit K010demonstrated compliance with the 78 percent, by weight, capture efficiency limitation for VOC on June 26, 2012;

iv. The CI station of emissions unit K016demonstrated compliance with the 78 percent, by weight, capture efficiency limitation for VOC on June 29, 2012;

v. The CI station and in-line flexo station of emissions unit K020demonstrated compliance with the 90 percent, by weight, capture efficiency limitation for VOC on June 27, 2012 and June 28, 2012, respectively; and

vi. The CI station of emissions unit K021 demonstrated compliance with the 90 percent, by weight, capture efficiency limitation for VOC on June 29, 2012.

d. The test method(s) which must be employed to demonstrate compliance with the capture and control (destruction) efficiency limitations for VOC are specified below. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

e. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

f. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the U.S. EPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

g. If necessary, during each capture efficiency test run, the permittee shall measure the air flow rate or rate indicator at the outlet of thecoating station(s) for the emissions units listed above.

[Authority for term: OAC rule 3745-21-10(C), OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

(2) For additional testing requirements, see 6.c)(1) through (5) in Section B: Facility-Wide Terms and Conditions.

(3) 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 Limitations:

The emissions of VOC from emissions unit K008 which includes the CI station and in-line gravure station shall not exceed 85.0 pounds perhour.

The emissions of VOC from emissions unit K010 which includes the CI station and in-line gravure and flexo stations shall not exceed 222.0 pounds per hour.

The emissions of VOC from emissions unit K016 which includes the CI station and in-line flexo station shall not exceed 34.0 pounds per hour.

The emissions of VOC from emissions unit K020 which includes the CI station and in-line gravure and flexo stations shall not exceed 124.0 pounds per hour.

The emissions of VOC from emissions unit K021 which includes the CI station and in-line gravure and flexo stations shall not exceed 16.22 pounds per hour.

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitations above shall be demonstrated by multiplying the maximum line speed in feet per minute by 60 minutes per hour times the maximum print/coat width in feet times the maximum pounds of VOC per ream times one ream per 3000 square feet times (1-X*) or by multiplying the “worst-case” VOC content, in pounds of VOC per gallon of coating, by the maximum gallons of coatings applied per hour when employing all complying coatings on the emissions unit.

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitations above in accordance with Methods 1-4 and 18, 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

*“X” is the overall control efficiency for the emissions unit (the capture efficiency times the control (destruction) efficiency) required by the most stringent regulation.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

b. Emission Limitations:

The emissions of VOC from emissions unit K008 which includes the CI station and in-line gravure station shall not exceed 109 tons per year.

The emissions of VOC from emissions unit K010 which includes the CI station and in-line gravure and flexo stations shall not exceed109tons per year.

The emissions of VOC from emissions unit K016 which includes the CI station and in-line flexo station shall not exceed 109 tons per year.

The emissions of VOC from emissions unit K020 which includes the CI station and in-line gravure and flexo stations shall not exceed109tons per year.

The emissions of VOC from emissions unit K021 which includes the CI station and in-line gravure and flexo stations shall not exceed 22.0 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitations above shall be demonstrated through the record keeping requirements established in Section B. Facility-Wide Terms and Conditions and d)(10) above.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

c. Emission Limitations:

The VOC content of thecoatings andinks employed shall not exceed forty percent VOC by volume of the coating and ink, excluding water and exempt solvents or twenty-five percent VOC by volume of the volatile matter in the coating and ink.

The VOC content of the coatings and inks employed shall not exceed 0.8 pound of VOC per pound of solids applied or 0.16 pound of VOC per pound of coating or ink applied.

Applicable Compliance Method:

Compliance with the allowable VOC emission limitations above shall be demonstrated through the record keeping requirements established in d)(8) above.

OAC rule 3745-21-10(B). Use either the procedures set forth in U.S. EPA Method 24 (for coatings) and U.S. EPA Method 24A (for flexographic and rotogravure printing inks and related coatings), or the coating formulation data from the coating manufacturer and coating user. Pursuant to 3745-21-10(B)(1), this method applies to coatings, inks or other coating materials employed in a coating line, printing line or other operation. For purposes of this method "coating" shall also mean "ink" or other coating material.

[Authority for term: OAC rule 3745-21-10(B), OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

d. Emission Limitations:

When a station of emissions unit K003 is employing any ink or coating that does not met OAC rule 3745-21-09(Y)(1)(a) and (Y)(4)(a)(ii), the station shall be equipped with a capture system and associated control system which are designed and operated to achieve a control (destruction) efficiency which is at least 90 percent, by weight, and a capture efficiency which is at least 65 percent, by weight.

When a station of emissions unit K003 is employing any ink or coating that does not met OAC rule 3745-21-09(Y)(1)(a) and (Y)(4)(a)(ii), the station shall employ a control system to reduce VOC emissions by 65 percent overall control.

For emissions units K008, K010 and K016: each station (when not operating as described by c)(2) above) shall be equipped with a capture system and associated control system which are designed and operated to achieve a control (destruction) efficiency which is at least 90 percent by weight and a capture efficiency which is at least 78 percent by weight for VOC.

For emissions unit K020: each station (when not operating as described by c)(2) above) shallbe equipped with a capture system andassociated control system which are designed and operated toachieve a control (destruction) efficiency which is at least 90 percent byweight and a capture efficiency which is at least 90 percent byweight for VOC.

When a station of emissions unit K016 is employing any ink or coating that does not met OAC rule 3745-21-09(Y)(1)(a) and (Y)(4)(a)(ii), the station shall employ a control system to reduce VOC emissions by 75 percent overall control.

For emissions unit K021: each station(when not operating as described by c)(2) above) shall be equipped with a capture system andassociated control system which are designed and operated toachieve a control (destruction) efficiency which is at least 95 percent byweight and a capture efficiency which is at least 90 percent byweight for VOC

Applicable Compliance Method:

Compliance with the allowable capture and control (destruction) efficiency limitations for VOC above shall be demonstrated based upon the results of emission testing conducted in accordance with the procedures and test methods as outlined in 6.c)(2) through 6.c)(5) in Section B: Facility-Wide Terms and Conditions in f)(1) above.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(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 units' 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 permittees to apply for and obtain a new or modified Permit to Install (PTI) 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 PTI.