

Facility ID: 0679020011 Issuance type: Final State Permit To Operate

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

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

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

Facility ID: 0679020011 Emissions Unit ID: K021 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
3 color flexographic tail printer	OAC rule 3745-31-05(A)(3) (PTI 06-07921)	Emissions of volatile organic compounds (VOC) shall not exceed 4.2 lbs/hr.
	OAC rule 3745-21-09(Y)(1)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(Y)(1) and 3745-35-07(B). The VOC content of coatings and inks used shall not exceed either: 40% VOC by volume of the coating and ink, excluding water and exempt solvents; or 25% VOC by volume of the volatile matter in the coating and ink.
	OAC rule 3745-35-07(B)	Combined annual emissions of VOC from the facility shall not exceed 99.0 tons as a rolling, 12-month summation.

See section A.2.a below.

2. Additional Terms and Conditions

- (a) The emissions units at this facility include bag gluing line K001 and printing lines K006, K007, K014, K015, K016, K017, K018, K019, K020 and K021. Potential emissions from de minimus and exempt sources are less than one ton of VOC per year, combined.
The hourly VOC emission limitation was established to reflect the potential to emit for this emissions unit. Therefore, no additional monitoring, record keeping and/or reporting is necessary to ensure compliance with this limitation.

B. Operational Restrictions

1. Total VOC in materials used at this facility shall not exceed 99.0 tons, calculated as a rolling, 12-month summation, as demonstrated by the record keeping requirements specified in section C.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each month for all printing operations identified in section A.2.a above:
 - a. the company identification for each coating, ink and cleanup material employed;
 - b. the VOC content, in percent by volume of each coating and ink, excluding water and exempt solvents, or the VOC content, in percent by volume of the volatile matter in each coating and ink;
 - c. the number of gallons of each coating, ink and cleanup material employed;
 - d. the VOC content of each coating, ink and cleanup material employed, in pounds per gallon;
 - e. the total VOC emissions from all printing lines at this facility; and

f. the summation of the VOC emissions from all printing lines at this facility for the previous 12-month period.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. This information does not have to be kept on a line-by-line basis. Also, if the permittee mixes coatings at a line, it is not necessary to identify and quantify each resulting mixture or record the VOC content of the resulting mixture.]

2. The permittee shall collect and record the following information for the AD Bottomer (K001) each month:
 - a. the company identification for each coating and cleanup material employed in this emissions unit;
 - b. the number of gallons of each coating and cleanup material employed in this emissions unit;
 - c. the VOC content of each coating and cleanup material, in pounds per gallon;
 - d. the total VOC emission rate for all coatings and cleanup materials employed in this emissions unit, in tons; and
 - e. the summation of the VOC emissions from this emissions unit for the previous 12-month period, in tons.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, if the permittee mixes coatings at a line, it is not necessary to identify and quantify each resulting mixture or record the VOC content of the resulting mixture.]

3. The permittee shall collect and record, each month, the summation of the VOC emissions from all emissions units at this facility for the previous 12-month period, in tons (i.e., the sum of C.1.f and C.2.e).

D. Reporting Requirements

1. This facility shall submit semiannual reports to the Ohio EPA Southeast District Office, which summarize the information required by sections C.1, C.2 and C.3 above. The reports shall be submitted by February 15 and August 15 of each year and shall cover the previous six calendar months (July through December and January through June, respectively).
2. The permittee shall notify the Ohio EPA Southeast District Office in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Ohio EPA Southeast District Office within 30 days following the end of the calendar month.

E. Testing Requirements

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

Emission Limitation:

Emissions of VOC shall not exceed 4.2 lbs/hr.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the following calculation of emissions at the highest coating usage rate applying the coatings with the highest VOC content:

$$(60 \text{ lbs/hr})(7.0\% \text{ VOC, by weight}) = 4.2 \text{ lbs VOC/hr}$$

Emission Limitation:

The VOC content of coatings and inks used shall not exceed either: 40% VOC by volume of the coating and ink, excluding water and exempt solvents; or 25% VOC by volume of the volatile matter in the coating and ink.

Applicable Compliance Method:

Compliance with the VOC content limitations shall be demonstrated by the record keeping requirements specified in section C.1 above.

Emission Limitation:

Combined annual emissions of VOC from the facility shall not exceed 99.0 tons as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual VOC emission limitation shall be demonstrated by the record keeping requirements specified in sections C.1, C.2 and C.3 above.
2. Formulation data or USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the VOC content of the coatings and cleanup materials.

F. Miscellaneous Requirements

1. None