State of Ohio Environmental Protection Agency

Street Address:
Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

TELE: (614) 644-3020 **FAX:** (614) 644-2329

Mailing Address:
Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

04/30/03

CERTIFIED MAIL

RE: Final Title V Chapter 3745-77 permit

13-18-22-6136
Automated Packaging Systems
Paul Banfield
Automated Packaging Systems, Inc.
10175 Philipp Parkway
Streetsboro, OH 44241

Dear Paul Banfield:

Enclosed is the 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.

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 Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final 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. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street
Room 300
Columbus, Ohio 43215

If you have any questions, please contact Cleveland Division of Air Pollution Control.

Very truly yours,

Michael W. Ahern

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

cc: Cleveland Division of Air Pollution Control
File, DAPC PMU

State of Ohio Environmental Protection Agency

FINAL TITLE V PERMIT

Issue Date: **04/30/03**	Effective Date: **05/21/03**	Expiration Date: **05/21/08**

This document constitutes issuance of a Title V permit for Facility ID: 13-18-22-6136 to:
Automated Packaging Systems
Automated Packaging Systems, Inc.
13555 McCracken Road
Garfield Heights, OH 44125

Emissions Unit ID (Company ID)/Emissions Unit Activity Description

K001 (Flexo Press #4)
Flexographic Printing Press

K002 (Flexo Press #3)
Flexographic Printing Press

K005 (FMC Press #6)
6 Color Flexographic Printing Press

K006 (FMC Press #7)
6 Color Flexographic Printing Press

K007 (FMC Press #8)
6 Color Flexographic Printing Press

K012 (Soloflex #1)
Windmoeller & Hoelscher Soloflex #1 - 6 Color Flexographic Printing Press

K013 (Soloflex #2)
Windmoeller & Hoelscher Soloflex #2 - 6 Color Flexographic Printing Press

K014 (Press #9)
6 Color Flexographic Printing Press for polyethylene film printing

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. 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. 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, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the current Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

Cleveland Division of Air Pollution Control
1925 St. Clair
Cleveland, OH 44114
(216) 664-2324

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

1. 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, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

i. The date, place (as defined in the permit), and time of sampling or measurements.
ii. The date(s) analyses were performed.
iii. The company or entity that performed the analyses.
iv. The analytical techniques or methods used.
v. The results of such analyses.
vi. 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 recordings for 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:

i. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

ii. **All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) with respect to emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:**

(a) Written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations ; (ii) the probable cause of such deviations; and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Part III of this Title V permit, the written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year, and shall cover the previous calendar quarters. 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. These written reports shall satisfy the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations. See B.6 below if no deviations occurred during the quarter.
(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) ,(ii) and (iii))

(b) 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 deviation reporting requirements for this Title V permit, written reports that identify each malfunction that occurred during each calendar quarter shall be submitted, at a minimum, quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year, and shall cover the previous calendar quarters.

In identifying each deviation caused by a malfunction, the permittee shall specify the applicable requirement 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. Also, if a deviation caused by a malfunction is identified in a written report submitted pursuant to paragraph (a) above, a separate report is not required for that malfunction pursuant to this paragraph. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing, at a minimum, on a quarterly basis.

Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation, operational restriction, and control device operating parameter limitation shall be reported in the same manner as described above for malfunctions. These written reports for malfunctions (and scheduled maintenance projects, if appropriate) shall satisfy the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations.
(Authority for term: OAC rules 3745-77-07(A)(3)(c)(iii))

iii. **For monitoring, record keeping, and reporting requirements:**
Written reports that identify any deviations from the federally enforceable monitoring, record keeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year, for the previous six calendar months. 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. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii)

pertaining to the reporting of any deviations related to the monitoring, record keeping, and reporting requirements. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no deviations occurred during that period.
(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii))

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

2. Scheduled Maintenance/Malfunction Reporting

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 unit(s) or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06, 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).
(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iii))

3. Risk Management Plans

If the permittee is required to 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"), the permittee shall comply with the requirement to register such a plan.
(Authority for term: OAC rule 3745-77-07(A)(4))

4. 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))

5. 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))

6. General Requirements

a. The permittee must comply with all terms and conditions of this permit. 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 permit.

c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.10 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.

(Authority for term: OAC rule 3745-77-07(A)(7))

7. 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))

8. 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))

9. 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 general terms and conditions shall apply to all operating scenarios authorized in this permit.

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

10. 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))

11. 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))

12. 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:

i. 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.

ii. 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.

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

iv. 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 appropriate Ohio EPA District Office or local air agency 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:

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

ii. 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 appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:

i. 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.

ii. Compliance certifications shall include the following:

(a) An identification of each term or condition of this permit that is the basis of the certification.

(b) The permittee's current compliance status.

(c) Whether compliance was continuous or intermittent.

(d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.

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

iii. 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))

13. 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))

14. 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 appropriate Ohio EPA District Office or local air agency 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 appropriate District Office of the Ohio EPA or local air agency 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))

15. 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))

16. 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 emission 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.

(For purposes of clarification, the permittee can refer to Engineering Guide #63 that is available in the STARSHIP software package.)
(Authority for term: OAC rule 3745-77-07(I))

17. 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 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.
(This term is provided for informational purposes only.)

18. Insignificant Activities

Each insignificant activity that has one or more applicable requirements shall comply with those applicable requirements.
(Authority for term: OAC rule 3745-77-07(A)(1))

19. 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))

20. 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))

B. *State Only Enforceable Section*

1. Reporting Requirements Related to Monitoring and Record Keeping Requirements

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 the appropriate Ohio EPA District Office or local air agency.

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 appropriate Ohio EPA District Office or local air agency. 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, i.e., 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.)

2. Records Retention Requirements

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.

3. 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.

4. Scheduled Maintenance/Malfunction Reporting

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 appropriate Ohio EPA District Office or local air agency 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).

5. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

6. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforcable Section

1. All asbestos renovation and demolition activities conducted at this facility shall be performed in accordance with the applicable requirements specified in 40 CFR Part 61 and OAC Chapter 3745-20.

2. Facility Emission Limitations:
Pursuant to OAC rule 3745-31-05(D) in Permit to Install 13-3562 and Permit to Install 13-04026, the permittee shall not exceed the following hazardous air pollutant (HAP) usages for the entire facility:

a. This facility shall use less than 9.9 tons per each rolling, 12-month period of each hazardous air pollutant (HAP), including materials used for source categories or purposes other than printing and publishing.

b. This facility shall use less than 24.0 tons per each rolling, 12-month period of any combination of HAPs, including materials used for source categories or purposes other than printing and publishing.

c. The following materials may be excluded from the limitations: material used in routine janitorial or facility grounds maintenance; personal uses by employees or other persons; the use of products for the purpose of maintaining electric, propane, gasoline and diesel powered motor vehicles operated by the facility; and the use of HAPs contained in intake water (used for processing or non contact cooling) or intake air (used either as compressed air or for combustion).

3. Facility Monitoring and/or Record Keeping Requirements:

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

a. the name and identification number of each HAP-containing material employed;

b. the individual HAP content for each HAP-containing material, in pounds of individual HAP per pound of material;

c. the total combined HAPs content for each HAP-containing material, in pounds of combined HAPs per pound of material [sum all the individual HAP contents from (b)];

d. the number of pounds of each HAP-containing material employed;

e. the total individual HAP usage from all HAP-containing materials, in pounds or tons [for each HAP, the sum of (b) times (d) for each material];

f. the total combined HAPs usage from all HAP-containing materials, in pounds or tons [the sum of (c) times (d) for each material];

g. the rolling, 12-month summation of usage for each individual HAP, in pounds or tons [the information for the current month and the preceding eleven calendar months];

h. the rolling, 12-month summation of usage for total combined HAPs, in pounds or tons [the information for the current month and the preceding eleven calendar months].

A listing of the HAPs can be found in Section 112(b) of Title III of the Clean Air Act. This information does not have to be kept on an individual emissions unit basis.

A. State and Federally Enforcable Section (continued)

4. Facility Reporting Requirements:

a. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each month during which the usage of any individual HAP exceeded 9.9 tons, as a rolling 12-month summation, and the actual individual HAP usage for each such month.

b. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each month during which the total usage of combined HAPs exceeded 24.0 tons, as a rolling 12-month summation, and the actual total combined HAPs usage for each such month.

5. Facility Testing Requirements:

a. Emission Limitation:
This facility shall use less than 9.9 tons per each rolling, 12-month period of each hazardous air pollutant (HAP), including materials used for source categories or purposes other than printing and publishing.

Applicable Compliance Method:
Compliance shall be demonstrated based upon the record keeping requirements specified in Part II Section A.3.

b. Emission Limitation:
This facility shall use less than 24.0 tons per each rolling, 12-month period of any combination of HAPs, including materials used for source categories or purposes other than printing and publishing.

Applicable Compliance Method:
Compliance shall be demonstrated based upon the record keeping requirements specified in Part II Section A.3.

B. State Only Enforceable Section

1. The following insignificant emissions units are located at this facility:

P009 automated methane flare with a spark ignited propane pilot;
Z001 organic polymeric plate making and closed organic solvent distillation unit;
Z007 mineral spirits parts washer in maintenance department;
Z011 press roll cleaning and floor cleaning using organic solvent;
Z012 ink blending for mixing ink colors inside a room;
Z013 three polyethylene blown film extruders;
Z014 eighteen bag conversion machines for folding, sealing and cutting printed polyethylene bags;
T001 8000-gallon underground organic solvent storage tank; and
T002 4000-gallon underground organic solvent storage tank.

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a permit to install for the emissions unit.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Flexo Press #4 (K001)

Activity Description: Flexographic Printing Press

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
four (4) color flexographic printing press #4 equipped with a regenerative thermal incinerator system consisting of two incinerators with one inlet and one exhaust from the incinerator system (the two incinerators act as one unit; either or both incinerators may operate)	OAC rule 3745-31-05(D) (PTI 13-817)	Volatile organic compound (VOC) emissions, including emissions from cleanup materials, from emissions units K001, K002, K005, K006, and K007, combined, shall not exceed 92 tons per year (TPY). The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(Y)(1)(b).
	OAC rule 3745-21-09(Y)(1)(b)	See Section A.I.2 below.

2. Additional Terms and Conditions

2.a This emissions unit shall be equipped with a capture and associated VOC control system which is designed and operated to achieve the following efficiencies:

i. a capture efficiency which is at least 65 percent by weight; and

ii. a control efficiency which is at least 90 percent by weight.

II. Operational Restrictions

1. The average temperature of the exhaust gases from each thermal incinerator in operation, for any 3-hour block of time, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #13-817, issued on July 29, 1983 and modified on October 3, 1985: A.III.2, A.III.3, and A.III.4. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within each thermal incinerator in operation when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording device(s) shall be capable of accurately measuring the desired parameter. The temperature monitors and recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

3. The permittee shall collect and record the following information for each day this emissions unit is in operation:

a. a log of downtime for the capture system, thermal incinerators, monitoring equipment, and the associated emissions unit; and

b. the average temperature of the exhaust gases from each thermal incinerator in operation during each 3-hour block of time during the day.

4. The permittee shall collect and record the following information on an annual basis for emissions units K001, K002, K005, K006, and K007, combined:

a. the number of gallons of each coating and ink employed;

b. the VOC content of each coating and ink employed, in pounds per gallon;

c. the total uncontrolled VOC emissions from all coatings and inks employed, calculated as the sum of (a)X(b) for all coatings and inks employed, in pounds and tons;

d. the number of gallons of each cleanup material employed;

e. the VOC content of each cleanup material employed, in pounds per gallon;

f. the total uncontrolled VOC emissions from all cleanup materials employed, calculated as the sum of (d)X(e) for all cleanup materials employed, in pounds and tons;

g. the total uncontrolled VOC emissions from all coatings, inks, and cleanup materials employed, calculated as the sum of (c) and (f), in tons; and

h. the total controlled VOC emissions from all coatings, inks, and cleanup materials employed, in tons, calculated as (g) X (1-x) where "x" is the overall control efficiency from the most recent emission test that demonstrated that the emissions unit was in compliance.

IV. Reporting Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #13-817, issued on July 29, 1983 and modified on October 3, 1985: A.IV.2 and A.IV.3. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

IV. Reporting Requirements (continued)

2. The permittee shall submit quarterly summaries of the following records:

a. a log of operating time for the capture (collection) system, thermal incinerators, monitoring equipment, and the associated emissions unit; and

b. all 3-hour blocks of time during which the average temperature of the exhaust gases from the thermal incinerators did not comply with the temperature limitation specified above.

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.

3. The permittee shall submit annual reports that specify the total emissions of VOC from emissions units K001, K002, K005, K006, and K007 combined for the previous calendar year. The reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #13-817, issued on July 29, 1983 and modified on October 3, 1985: A.V.2, A.V.3, A.V.4, A.V.5, and A.V.6. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit within 6 months after the issuance of this permit, during the third year of this permit, and 6 months prior to permit expiration.

2.a The emission testing shall be conducted to demonstrate compliance with the 65% capture efficiency and 90% control efficiency requirements.

2.b The following test methods shall be employed:

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 USEPA'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.)

The control 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(C). 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.

Alternative USEPA-approved test methods may be used with prior approval from the Ohio EPA.

3. The tests 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.

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 tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission tests.

V. Testing Requirements (continued)

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the tests, 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.

A comprehensive written report on the results of the emissions tests 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 tests. 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.

4. Emission Limitation:
VOC emissions from emissions units K001, K002, K005, K006, and K007, combined, shall not exceed 92 TPY.

Applicable Compliance Method:
Compliance shall be demonstrated based upon the record keeping requirements specified in Section A.III.4.

5. USEPA Method 24 (40 CFR Part 60, Appendix A) shall be used to determine the VOC contents of the coatings.

6. USEPA Method 24 (40 CFR Part 60, Appendix A) or formulation data shall be used to determine the VOC contents of the cleanup materials.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Flexo Press #3 (K002)

Activity Description: Flexographic Printing Press

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
four (4) color flexographic printing press #3 equipped with a regenerative thermal incinerator system consisting of two incinerators with one inlet and one exhaust from the incinerator system (the two incinerators act as one unit; either or both incinerators may operate)	OAC rule 3745-31-05(D) (PTI 13-817)	Volatile organic compound (VOC) emissions, including emissions from cleanup materials, from emissions units K001, K002, K005, K006, and K007, combined, shall not exceed 92 tons per year (TPY). The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(Y)(1)(b).
	OAC rule 3745-21-09(Y)(1)(b)	See Section A.I.2 below.

2. Additional Terms and Conditions

2.a This emissions unit shall be equipped with a capture and associated VOC control system which is designed and operated to achieve the following efficiencies:

i. a capture efficiency which is at least 65 percent by weight; and

ii. a control efficiency which is at least 90 percent by weight.

II. Operational Restrictions

1. The average temperature of the exhaust gases from each thermal incinerator in operation, for any 3-hour block of time, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #13-817, issued on July 29, 1983 and modified on October 3, 1985: A.III.2, A.III.3, and A.III.4. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within each thermal incinerator in operation when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording device(s) shall be capable of accurately measuring the desired parameter. The temperature monitors and recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

3. The permittee shall collect and record the following information for each day this emissions unit is in operation:

a. a log of downtime for the capture system, thermal incinerators, monitoring equipment, and the associated emissions unit; and

b. the average temperature of the exhaust gases from each thermal incinerator in operation during each 3-hour block of time during the day.

4. The permittee shall collect and record the following information on an annual basis for emissions units K001, K002, K005, K006, and K007, combined:

a. the number of gallons of each coating and ink employed;

b. the VOC content of each coating and ink employed, in pounds per gallon;

c. the total uncontrolled VOC emissions from all coatings and inks employed, calculated as the sum of (a)X(b) for all coatings and inks employed, in pounds and tons;

d. the number of gallons of each cleanup material employed;

e. the VOC content of each cleanup material employed, in pounds per gallon;

f. the total uncontrolled VOC emissions from all cleanup materials employed, calculated as the sum of (d)X(e) for all cleanup materials employed, in pounds and tons;

g. the total uncontrolled VOC emissions from all coatings, inks, and cleanup materials employed, calculated as the sum of (c) and (f), in tons; and

h. the total controlled VOC emissions from all coatings, inks, and cleanup materials employed, in tons, calculated as (g) X (1-x) where "x" is the overall control efficiency from the most recent emission test that demonstrated that the emissions unit was in compliance.

IV. Reporting Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #13-817, issued on July 29, 1983 and modified on October 3, 1985: A.IV.2 and A.IV.3. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

IV. Reporting Requirements (continued)

2. The permittee shall submit quarterly summaries of the following records:

a. a log of operating time for the capture (collection) system, thermal incinerators, monitoring equipment, and the associated emissions unit; and

b. all 3-hour blocks of time during which the average temperature of the exhaust gases from the thermal incinerators did not comply with the temperature limitation specified above.

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.

3. The permittee shall submit annual reports that specify the total emissions of VOC from emissions units K001, K002, K005, K006, and K007 combined for the previous calendar year. The reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #13-817, issued on July 29, 1983 and modified on October 3, 1985: A.V.2, A.V.3, A.V.4, A.V.5, and A.V.6. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit within 6 months after the issuance of this permit, during the third year of this permit, and 6 months prior to permit expiration.

2.a The emission testing shall be conducted to demonstrate compliance with the 65% capture efficiency and 90% control efficiency requirements.

2.b The following test methods shall be employed:

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 USEPA'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.)

The control 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(C). 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.

Alternative USEPA-approved test methods may be used with prior approval from the Ohio EPA.

3. The tests 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.

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 tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission tests.

V. Testing Requirements (continued)

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the tests, 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.

A comprehensive written report on the results of the emissions tests 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 tests. 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.

4. Emission Limitation:
VOC emissions from emissions units K001, K002, K005, K006, and K007, combined, shall not exceed 92 TPY.

Applicable Compliance Method:
Compliance shall be demonstrated based upon the record keeping requirements specified in Section A.III.4.

5. USEPA Method 24 (40 CFR Part 60, Appendix A) shall be used to determine the VOC contents of the coatings.

6. USEPA Method 24 (40 CFR Part 60, Appendix A) or formulation data shall be used to determine the VOC contents of the cleanup materials.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: FMC Press #6 (K005)

Activity Description: 6 Color Flexographic Printing Press

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
six (6) color flexographic printing press FMC #6 equipped with a regenerative thermal incinerator system consisting of two incinerators with one inlet and one exhaust from the incinerator system (the two incinerators act as one unit; either or both incinerators may operate)	OAC rule 3745-31-05(D) (PTI 13-817)	Volatile organic compound (VOC) emissions, including emissions from cleanup materials, from emissions units K001, K002, K005, K006, and K007, combined, shall not exceed 92 tons per year (TPY). The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(Y)(1)(b).
	OAC rule 3745-21-09(Y)(1)(b)	See Section A.I.2 below.

2. Additional Terms and Conditions

2.a This emissions unit shall be equipped with a capture and associated VOC control system which is designed and operated to achieve the following efficiencies:

i. a capture efficiency which is at least 65 percent by weight; and

ii. a control efficiency which is at least 90 percent by weight.

II. Operational Restrictions

1. The average temperature of the exhaust gases from each thermal incinerator in operation, for any 3-hour block of time, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #13-817, issued on July 29, 1983 and modified on October 3, 1985: A.III.2, A.III.3, and A.III.4. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within each thermal incinerator in operation when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording device(s) shall be capable of accurately measuring the desired parameter. The temperature monitors and recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

3. The permittee shall collect and record the following information for each day this emissions unit is in operation:

a. a log of downtime for the capture system, thermal incinerators, monitoring equipment, and the associated emissions unit; and

b. the average temperature of the exhaust gases from each thermal incinerator in operation during each 3-hour block of time during the day.

4. The permittee shall collect and record the following information on an annual basis for emissions units K001, K002, K005, K006, and K007, combined:

a. the number of gallons of each coating and ink employed;

b. the VOC content of each coating and ink employed, in pounds per gallon;

c. the total uncontrolled VOC emissions from all coatings and inks employed, calculated as the sum of (a)X(b) for all coatings and inks employed, in pounds and tons;

d. the number of gallons of each cleanup material employed;

e. the VOC content of each cleanup material employed, in pounds per gallon;

f. the total uncontrolled VOC emissions from all cleanup materials employed, calculated as the sum of (d)X(e) for all cleanup materials employed, in pounds and tons;

g. the total uncontrolled VOC emissions from all coatings, inks, and cleanup materials employed, calculated as the sum of (c) and (f), in tons; and

h. the total controlled VOC emissions from all coatings, inks, and cleanup materials employed, in tons, calculated as (g) X (1-x) where "x" is the overall control efficiency from the most recent emission test that demonstrated that the emissions unit was in compliance.

IV. Reporting Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #13-817, issued on July 29, 1983 and modified on October 3, 1985: A.IV.2 and A.IV.3. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

IV. Reporting Requirements (continued)

2. The permittee shall submit quarterly summaries of the following records:

a. a log of operating time for the capture (collection) system, thermal incinerators, monitoring equipment, and the associated emissions unit; and

b. all 3-hour blocks of time during which the average temperature of the exhaust gases from the thermal incinerators did not comply with the temperature limitation specified above.

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.

3. The permittee shall submit annual reports that specify the total emissions of VOC from emissions units K001, K002, K005, K006, and K007 combined for the previous calendar year. The reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #13-817, issued on July 29, 1983 and modified on October 3, 1985: A.V.2, A.V.3, A.V.4, A.V.5, and A.V.6. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit within 6 months after the issuance of this permit, during the third year of this permit, and 6 months prior to permit expiration.

2.a The emission testing shall be conducted to demonstrate compliance with the 65% capture efficiency and 90% control efficiency requirements.

2.b The following test methods shall be employed:

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 USEPA'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.)

The control 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(C). 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.

Alternative USEPA-approved test methods may be used with prior approval from the Ohio EPA.

3. The tests 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.

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 tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission tests.

V. Testing Requirements (continued)

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the tests, 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.

A comprehensive written report on the results of the emissions tests 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 tests. 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.

4. Emission Limitation:
VOC emissions from emissions units K001, K002, K005, K006, and K007, combined, shall not exceed 92 TPY.

Applicable Compliance Method:
Compliance shall be demonstrated based upon the record keeping requirements specified in Section A.III.4.

5. USEPA Method 24 (40 CFR Part 60, Appendix A) shall be used to determine the VOC contents of the coatings.

6. USEPA Method 24 (40 CFR Part 60, Appendix A) or formulation data shall be used to determine the VOC contents of the cleanup materials.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: FMC Press #7 (K006)

Activity Description: 6 Color Flexographic Printing Press

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
six (6) color flexographic printing press FMC #7 equipped with a regenerative thermal incinerator system consisting of two incinerators with one inlet and one exhaust from the incinerator system (the two incinerators act as one unit; either or both incinerators may operate)	OAC rule 3745-31-05(D) (PTI 13-817)	Volatile organic compound (VOC) emissions, including emissions from cleanup materials, from emissions units K001, K002, K005, K006, and K007, combined, shall not exceed 92 tons per year (TPY). The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(Y)(1)(b).
	OAC rule 3745-21-09(Y)(1)(b)	See Section A.I.2 below.

2. Additional Terms and Conditions

2.a This emissions unit shall be equipped with a capture and associated VOC control system which is designed and operated to achieve the following efficiencies:

i. a capture efficiency which is at least 65 percent by weight; and

ii. a control efficiency which is at least 90 percent by weight.

II. Operational Restrictions

1. The average temperature of the exhaust gases from each thermal incinerator in operation, for any 3-hour block of time, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #13-817, issued on July 29, 1983 and modified on October 3, 1985: A.III.2, A.III.3, and A.III.4. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within each thermal incinerator in operation when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording device(s) shall be capable of accurately measuring the desired parameter. The temperature monitors and recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

3. The permittee shall collect and record the following information for each day this emissions unit is in operation:

a. a log of downtime for the capture system, thermal incinerators, monitoring equipment, and the associated emissions unit; and

b. the average temperature of the exhaust gases from each thermal incinerator in operation during each 3-hour block of time during the day.

4. The permittee shall collect and record the following information on an annual basis for emissions units K001, K002, K005, K006, and K007, combined:

a. the number of gallons of each coating and ink employed;

b. the VOC content of each coating and ink employed, in pounds per gallon;

c. the total uncontrolled VOC emissions from all coatings and inks employed, calculated as the sum of (a)X(b) for all coatings and inks employed, in pounds and tons;

d. the number of gallons of each cleanup material employed;

e. the VOC content of each cleanup material employed, in pounds per gallon;

f. the total uncontrolled VOC emissions from all cleanup materials employed, calculated as the sum of (d)X(e) for all cleanup materials employed, in pounds and tons;

g. the total uncontrolled VOC emissions from all coatings, inks, and cleanup materials employed, calculated as the sum of (c) and (f), in tons; and

h. the total controlled VOC emissions from all coatings, inks, and cleanup materials employed, in tons, calculated as (g) X (1-x) where "x" is the overall control efficiency from the most recent emission test that demonstrated that the emissions unit was in compliance.

IV. Reporting Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #13-817, issued on July 29, 1983 and modified on October 3, 1985: A.IV.2 and A.IV.3. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

IV. Reporting Requirements (continued)

2. The permittee shall submit quarterly summaries of the following records:

a. a log of operating time for the capture (collection) system, thermal incinerators, monitoring equipment, and the associated emissions unit; and

b. all 3-hour blocks of time during which the average temperature of the exhaust gases from the thermal incinerators did not comply with the temperature limitation specified above.

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.

3. The permittee shall submit annual reports that specify the total emissions of VOC from emissions units K001, K002, K005, K006, and K007 combined for the previous calendar year. The reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #13-817, issued on July 29, 1983 and modified on October 3, 1985: A.V.2, A.V.3, A.V.4, A.V.5, and A.V.6. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit within 6 months after the issuance of this permit, during the third year of this permit, and 6 months prior to permit expiration.

2.a The emission testing shall be conducted to demonstrate compliance with the 65% capture efficiency and 90% control efficiency requirements.

2.b The following test methods shall be employed:

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 USEPA'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.)

The control 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(C). 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.

Alternative USEPA-approved test methods may be used with prior approval from the Ohio EPA.

3. The tests 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.

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 tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission tests.

V. Testing Requirements (continued)

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the tests, 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.

A comprehensive written report on the results of the emissions tests 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 tests. 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.

4. Emission Limitation:
VOC emissions from emissions units K001, K002, K005, K006, and K007, combined, shall not exceed 92 TPY.

Applicable Compliance Method:
Compliance shall be demonstrated based upon the record keeping requirements specified in Section A.III.4.

5. USEPA Method 24 (40 CFR Part 60, Appendix A) shall be used to determine the VOC contents of the coatings.

6. USEPA Method 24 (40 CFR Part 60, Appendix A) or formulation data shall be used to determine the VOC contents of the cleanup materials.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: FMC Press #8 (K007)

Activity Description: 6 Color Flexographic Printing Press

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
six (6) color flexographic printing press FMC #8 equipped with a regenerative thermal incinerator system consisting of two incinerators with one inlet and one exhaust from the incinerator system (the two incinerators act as one unit; either or both incinerators may operate)	OAC rule 3745-31-05(D) (PTI 13-817)	Volatile organic compound (VOC) emissions, including emissions from cleanup materials, from emissions units K001, K002, K005, K006, and K007, combined, shall not exceed 92 tons per year (TPY). The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(Y)(1)(b).
	OAC rule 3745-21-09(Y)(1)(b)	See Section A.I.2 below.

2. Additional Terms and Conditions

2.a This emissions unit shall be equipped with a capture and associated VOC control system which is designed and operated to achieve the following efficiencies:

i. a capture efficiency which is at least 65 percent by weight; and

ii. a control efficiency which is at least 90 percent by weight.

II. Operational Restrictions

1. The average temperature of the exhaust gases from each thermal incinerator in operation, for any 3-hour block of time, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #13-817, issued on July 29, 1983 and modified on October 3, 1985: A.III.2, A.III.3, and A.III.4. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall operate and maintain a continuous temperature monitors and recorders which measures and records the combustion temperature within each thermal incinerator in operation when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording device(s) shall be capable of accurately measuring the desired parameter. The temperature monitors and recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

3. The permittee shall collect and record the following information for each day this emissions unit is in operation:

a. a log of downtime for the capture system, thermal incinerators, monitoring equipment, and the associated emissions unit; and

b. the average temperature of the exhaust gases from each thermal incinerator in operation during each 3-hour block of time during the day.

4. The permittee shall collect and record the following information on an annual basis for emissions units K001, K002, K005, K006, and K007, combined:

a. the number of gallons of each coating and ink employed;

b. the VOC content of each coating and ink employed, in pounds per gallon;

c. the total uncontrolled VOC emissions from all coatings and inks employed, calculated as the sum of (a)X(b) for all coatings and inks employed, in pounds and tons;

d. the number of gallons of each cleanup material employed;

e. the VOC content of each cleanup material employed, in pounds per gallon;

f. the total uncontrolled VOC emissions from all cleanup materials employed, calculated as the sum of (d)X(e) for all cleanup materials employed, in pounds and tons;

g. the total uncontrolled VOC emissions from all coatings, inks, and cleanup materials employed, calculated as the sum of (c) and (f), in tons; and

h. the total controlled VOC emissions from all coatings, inks, and cleanup materials employed, in tons, calculated as (g) X (1-x) where "x" is the overall control efficiency from the most recent emission test that demonstrated that the emissions unit was in compliance.

IV. Reporting Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #13-817, issued on July 29, 1983 and modified on October 3, 1985: A.IV.2 and A.IV.3. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

IV. Reporting Requirements (continued)

2. The permittee shall submit quarterly summaries of the following records:

a. a log of operating time for the capture (collection) system, thermal incinerators, monitoring equipment, and the associated emissions unit; and

b. all 3-hour blocks of time during which the average temperature of the exhaust gases from the thermal incinerators did not comply with the temperature limitation specified above.

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.

3. The permittee shall submit annual reports that specify the total emissions of VOC from emissions units K001, K002, K005, K006, and K007 combined for the previous calendar year. The reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #13-817, issued on July 29, 1983 and modified on October 3, 1985: A.V.2, A.V.3, A.V.4, A.V.5, and A.V.6. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit within 6 months after the issuance of this permit, during the third year of this permit, and 6 months prior to permit expiration.

2.a The emission testing shall be conducted to demonstrate compliance with the 65% capture efficiency and 90% control efficiency requirements.

2.b The following test methods shall be employed:

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 USEPA'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.)

The control 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(C). 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.

Alternative USEPA-approved test methods may be used with prior approval from the Ohio EPA.

3. The tests 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.

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 tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission tests.

V. Testing Requirements (continued)

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the tests, 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.

A comprehensive written report on the results of the emissions tests 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 tests. 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.

4. Emission Limitation:
VOC emissions from emissions units K001, K002, K005, K006, and K007, combined, shall not exceed 92 TPY.

Applicable Compliance Method:
Compliance shall be demonstrated based upon the record keeping requirements specified in Section A.III.4.

5. USEPA Method 24 (40 CFR Part 60, Appendix A) shall be used to determine the VOC contents of the coatings.

6. USEPA Method 24 (40 CFR Part 60, Appendix A) or formulation data shall be used to determine the VOC contents of the cleanup materials.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Soloflex #1 (K012)

Activity Description: Windmoeller & Hoelscher Soloflex #1 - 6 Color Flexographic Printing Press

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
six (6) color flexographic printing press (ID: Windmoeller & Hoelscher Soloflex #1) equipped with a regenerative thermal incinerator system consisting of two incinerators with one inlet and one exhaust from the incinerator system (the two incinerators act as one unit; either or both incinerators may operate)	OAC rule 3745-31-05(A)(3) (PTI 13-04026)	Volatile organic compound (VOC) emissions, including emissions from cleanup materials, shall not exceed: 6.23 pounds VOC per hour (stack); and 15.58 pounds VOC per hour (fugitive). See Section A.I.2 below.
	OAC rule 3745-31-05(D) (PTI 13-04026)	34.26 TPY VOC per rolling, 12-month period for K012 and K013, combined, including emissions from cleanup materials
	OAC rule 3745-21-09(Y)(1)(b)	The capture and control efficiency limitations specified by this rule are less stringent than the capture and control efficiency limitations established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

2.a This emissions unit shall be equipped with a capture and associated VOC control system which is designed and operated to achieve the following efficiencies:

i. a capture efficiency which is at least 80 percent by weight; and

ii. a control efficiency which is at least 90 percent by weight.

II. Operational Restrictions

1. The average temperature of the exhaust gases from each thermal incinerator in operation, for any 3-hour block of time, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #13-4026, issued on March 13, 2003: A.III.2, A.III.3, and A.III.4. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

2. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within each thermal incinerator in operation when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

3. The permittee shall collect and record the following information for each day this emissions unit is in operation:

a. a log of downtime for the capture system, thermal incinerators, monitoring equipment, and the associated emissions unit; and

b. the average temperature of the exhaust gases from each thermal incinerator in operation during each 3-hour block of time during the day.

III. Monitoring and/or Record Keeping Requirements (continued)

4. The permittee shall collect and record the following information on a monthly basis:

a. the number of gallons of each coating and ink employed;

b. the VOC content of each coating and ink employed, in pounds per gallon;

c. the total uncontrolled VOC emissions from all coatings and inks employed, calculated as the sum of (a)X(b) for all coatings and inks employed, in pounds;

d. the number of gallons of each cleanup material employed;

e. the VOC content of each cleanup material employed, in pounds per gallon;

f. the total uncontrolled VOC emissions from all cleanup materials employed, calculated as the sum of (d)X(e) for all cleanup materials employed, in pounds;

g. the total uncontrolled VOC emissions from all coatings, inks, and cleanup materials employed, calculated as the sum of (c) and (f), in pounds;

h. the total controlled (stack) VOC emissions from all coatings, inks, and cleanup materials employed, in pounds, calculated as (g) X (1-x) X (y) where "x" is the control (destruction) efficiency from the most recent emission test that demonstrated that the emissions unit was in compliance and "y" is the capture efficiency from the most recent emission test that demonstrated that the emissions unit was in compliance;

i. the total fugitive VOC emissions from all coatings, inks, and cleanup materials employed, in pounds, calculated as (g) X (1-y) where "y" is the capture efficiency from the most recent emission test that demonstrated that the emissions unit was in compliance;

j. the number of hours the emissions unit was in operation;

k. the average hourly controlled VOC emission rate, in pounds per hour, calculated as (h)/(j);

l. the average hourly fugitive VOC emission rate, in pounds per hour, calculated as (i)/(j);

m. the total controlled VOC emissions from all coatings, inks, and cleanup materials, in tons per month, calculated as the sum of the values in Sections A.III.4.h and A.III.4.i for K012 and K013, combined, divided by 2000; and

n. the rolling, 12-month VOC emissions from K012 and K013, combined, in tons.

IV. Reporting Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #13-4026, issued on March 13, 2003: A.IV.2, A.IV.3, A.IV.4, A.IV.5, and A.IV.6. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

IV. Reporting Requirements (continued)

2. The permittee shall submit quarterly summaries of the following records:

a. a log of operating time for the capture (collection) system, thermal incinerators, monitoring equipment, and the associated emissions unit; and

b. all 3-hour blocks of time during which the average temperature of the exhaust gases from each thermal incinerator did not comply with the temperature limitation specified above.

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

3. The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the average hourly controlled (stack) VOC emission rate exceeded the limit in Section A.I.1.

4. The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the average hourly fugitive VOC emission rate exceeded the limit in Section A.I.1.

5. The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the rolling, 12-month VOC emissions from K012 and K013 combined exceeded the limit in Section A.I.1.

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

V. Testing Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #13-4026, issued on March 13, 2003: A.V.2, A.V.3, A.V.4, A.V.5, A.V.6, A.V.7, and A.V.8. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit within 6 months after the issuance of this permit, during the third year of the permit, and 6 months prior to permit expiration.

2.a The emission testing shall be conducted to demonstrate compliance with the 80% capture efficiency and 90% control efficiency requirements and the 6.23 pounds VOC per hour (stack) limit.

2.b The following test methods shall be employed:

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 USEPA'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.)

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) and the pounds VOC per hour emission rate shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10(C). 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.

Alternative USEPA-approved test methods may be used with prior approval from the Ohio EPA.

V. Testing Requirements (continued)

3. The tests 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.

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 tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission tests.

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the tests, 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.

A comprehensive written report on the results of the emissions tests 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 tests. 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.

4. Emission Limitation:
6.23 pounds VOC per hour (stack)

Applicable Compliance Method:
Compliance shall be demonstrated based upon the test methods and procedures specified in Section A.V.2 and the record keeping requirements specified in Section A.III.4.

5. Emission Limitation:
15.58 pounds VOC per hour (fugitive)

Applicable Compliance Method:
Compliance shall be demonstrated based upon the record keeping requirements specified in Section A.III.4.

6. Emission Limitation:
34.26 TPY VOC per rolling, 12-month period for K012 and K013, combined

Applicable Compliance Method:
Compliance shall be demonstrated based upon the record keeping requirements specified in Section A.III.4.

7. USEPA Method 24 (40 CFR Part 60, Appendix A) shall be used to determine the VOC contents of the coatings and inks.

8. USEPA Method 24 (40 CFR Part 60, Appendix A) or formulation data shall be used to determine the VOC contents of the cleanup materials.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Soloflex #2 (K013)

Activity Description: Windmoeller & Hoelscher Soloflex #2 - 6 Color Flexographic Printing Press

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
six (6) color flexographic printing press (ID: Windmoeller & Hoelscher Soloflex #2) equipped with a regenerative thermal incinerator system consisting of two incinerators with one inlet and one exhaust from the incinerator system (the two incinerators act as one unit; either or both incinerators may operate)	OAC rule 3745-31-05(A)(3) (PTI 13-04026)	Volatile organic compound (VOC) emissions, including emissions from cleanup materials, shall not exceed: 5.0 pounds VOC per hour (stack); and 12.46 pounds VOC per hour (fugitive). See Section A.I.2 below.
	OAC rule 3745-31-05(D) (PTI 13-04026)	34.26 TPY VOC per rolling, 12-month period for K012 and K013, combined, including emissions from cleanup materials
	OAC rule 3745-21-09(Y)(1)(b)	The capture and control efficiency limitations specified by this rule are less stringent than the capture and control efficiency limitations established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

2.a This emissions unit shall be equipped with a capture and associated VOC control system which is designed and operated to achieve the following efficiencies:

i. a capture efficiency which is at least 80 percent by weight; and

ii. a control efficiency which is at least 90 percent by weight.

II. Operational Restrictions

1. The average temperature of the exhaust gases from each thermal incinerator in operation, for any 3-hour block of time, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #13-4026, issued on March 13, 2003: A.III.2, A.III.3, and A.III.4. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

2. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within each thermal incinerator in operation when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

3. The permittee shall collect and record the following information for each day this emissions unit is in operation:

a. a log of downtime for the capture system, thermal incinerators, monitoring equipment, and the associated emissions unit; and

b. the average temperature of the exhaust gases from each thermal incinerator in operation during each 3-hour block of time during the day.

III. Monitoring and/or Record Keeping Requirements (continued)

4. The permittee shall collect and record the following information on a monthly basis:

a. the number of gallons of each coating and ink employed;

b. the VOC content of each coating and ink employed, in pounds per gallon;

c. the total uncontrolled VOC emissions from all coatings and inks employed, calculated as the sum of (a)X(b) for all coatings and inks employed, in pounds;

d. the number of gallons of each cleanup material employed;

e. the VOC content of each cleanup material employed, in pounds per gallon;

f. the total uncontrolled VOC emissions from all cleanup materials employed, calculated as the sum of (d)X(e) for all cleanup materials employed, in pounds;

g. the total uncontrolled VOC emissions from all coatings, inks, and cleanup materials employed, calculated as the sum of (c) and (f), in pounds;

h. the total controlled (stack) VOC emissions from all coatings, inks, and cleanup materials employed, in pounds, calculated as (g) X (1-x) X (y), where "x" is the control (destruction) efficiency from the most recent emission test that demonstrated that the emissions unit was in compliance and "y" is the capture efficiency from the most recent emission test that demonstrated that the emissions unit was in compliance;

i. the total fugitive VOC emissions from all coatings, inks, and cleanup materials employed, in pounds, calculated as (g) X (1-y) where "y" is the capture efficiency from the most recent emission test that demonstrated that the emissions unit was in compliance;

j. the number of hours the emissions unit was in operation;

k. the average hourly controlled VOC emission rate, in pounds per hour, calculated as (h)/(j);

l. the average hourly fugitive VOC emission rate, in pounds per hour, calculated as (i)/(j);

m. the total controlled VOC emissions from all coatings, inks, and cleanup materials, in tons per month, calculated as the sum of the values in Sections A.III.4.h and A.III.4.i for K012 and K013, combined, divided by 2000; and

n. the rolling, 12-month VOC emissions from K012 and K013, combined, in tons.

IV. Reporting Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #13-4026, issued on March 13, 2003: A.IV.2, A.IV.3, A.IV.4, A.IV.5, and A.IV.6. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

IV. Reporting Requirements (continued)

2. The permittee shall submit quarterly summaries of the following records:

a. a log of operating time for the capture (collection) system, thermal incinerators, monitoring equipment, and the associated emissions unit; and

b. all 3-hour blocks of time during which the average temperature of the exhaust gases from each thermal incinerator did not comply with the temperature limitation specified above.

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

3. The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the average hourly controlled (stack) VOC emission rate exceeded the limit in Section A.I.1.

4. The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the average hourly fugitive VOC emission rate exceeded the limit in Section A.I.1.

5. The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the rolling, 12-month VOC emissions from K012 and K013 combined exceeded the limit in Section A.I.1.

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

V. Testing Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #13-4026, issued on March 13, 2003: A.V.2, A.V.3, A.V.4, A.V.5, A.V.6, A.V.7, and A.V.8. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit within 6 months after the issuance of this permit, during the third year of the permit, and 6 months prior to permit expiration.

2.a The emission testing shall be conducted to demonstrate compliance with the 80% capture efficiency and 90% control efficiency requirements and the 5.0 pounds VOC per hour (stack) limit.

2.b The following test methods shall be employed:

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 USEPA'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.)

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) and the pounds VOC per hour emission rate shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10(C). 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.

Alternative USEPA-approved test methods may be used with prior approval from the Ohio EPA.

V. Testing Requirements (continued)

3. The tests 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.

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 tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission tests.

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the tests, 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.

A comprehensive written report on the results of the emissions tests 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 tests. 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.

4. Emission Limitation:
5.0 pounds VOC per hour (stack)

Applicable Compliance Method:
Compliance shall be demonstrated based upon the test methods and procedures specified in Section A.V.2 and the record keeping requirements specified in Section A.III.4.

5. Emission Limitation:
12.46 pounds VOC per hour (fugitive)

Applicable Compliance Method:
Compliance shall be demonstrated based upon the record keeping requirements specified in Section A.III.4.

6. Emission Limitation:
34.26 TPY VOC per rolling, 12-month period for K012 and K013, combined

Applicable Compliance Method:
Compliance shall be demonstrated based upon the record keeping requirements specified in Section A.III.4.

7. USEPA Method 24 (40 CFR Part 60, Appendix A) shall be used to determine the VOC contents of the coatings and inks.

8. USEPA Method 24 (40 CFR Part 60, Appendix A) or formulation data shall be used to determine the VOC contents of the cleanup materials.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Press #9 (K014)

Activity Description: 6 Color Flexographic Printing Press for polyethylene film printing

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
six (6) color flexographic printing press #9 equipped with a regenerative thermal incinerator system consisting of two incinerators with one inlet and one exhaust from the incinerator system (the two incinerators act as one unit; either or both incinerators may operate)	OAC rule 3745-31-05(D) (PTI 13-3562)	Volatile organic compound (VOC) emissions, including emissions from cleanup materials, shall not exceed 31.85 pounds per hour. VOC emissions shall not exceed 28.8 tons per year (TPY) as a rolling, 12-month summation. See Section A.I.2 below.
	OAC rule 3745-21-09(Y)(1)(b)	The capture and control efficiency limitations specified by this rule are less stringent than the capture and control efficiency limitations established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

2.a This emissions unit shall be equipped with a capture and associated VOC control system which is designed and operated to achieve the following efficiencies:

i. a capture efficiency which is at least 80 percent by weight; and

ii. a control efficiency which is at least 90 percent by weight.

II. Operational Restrictions

1. The average temperature of the exhaust gases from each thermal incinerator in operation, for any 3-hour block of time, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Modification Permit to Install #13-3562, issued on February 4, 2003: A.III.2, A.III.3, and A.III.4. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

2. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within each thermal incinerator in operation when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

3. The permittee shall collect and record the following information for each day this emissions unit is in operation:

a. a log of downtime for the capture system, thermal incinerators, monitoring equipment, and the associated emissions unit; and

b. the average temperature of the exhaust gases from each thermal incinerator in operation during each 3-hour block of time during the day.

4. The permittee shall collect and record the following information on a monthly basis:

a. the number of gallons of each coating and ink employed;

b. the VOC content of each coating and ink employed, in pounds per gallon;

c. the total uncontrolled VOC emissions from all coatings and inks employed, calculated as the sum of (a)X(b) for all coatings and inks employed, in pounds;

d. the number of gallons of each cleanup material employed;

e. the VOC content of each cleanup material employed, in pounds per gallon;

f. the total uncontrolled VOC emissions from all cleanup materials employed, calculated as the sum of (d)X(e) for all cleanup materials employed, in pounds;

g. the total uncontrolled VOC emissions from all coatings, inks, and cleanup materials employed, calculated as the sum of (c) and (f), in pounds;

h. the total controlled (stack) VOC emissions from all coatings, inks, and cleanup materials employed, in pounds, calculated as (g) X (1-x), where "x" is the overall control efficiency from the most recent emission test that demonstrated that the emissions unit was in compliance;

i. the number of hours the emissions unit was in operation;

j. the average hourly VOC emission rate calculated as (h)/(i), in pounds per hour;

k. the total controlled VOC emissions from all coatings, inks, and cleanup materials, in tons per month, calculated as the sum of the values in Section A.III.4.h for K014; and

l. the rolling, 12-month VOC emissions from K014, in tons.

IV. Reporting Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Modification Permit to Install #13-3562, issued on February 4, 2003: A.IV.2 and A.IV.3. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

2. The permittee shall submit quarterly summaries of the following records:

a. a log of operating time for the capture (collection) system, thermal incinerator, monitoring equipment, and the associated emissions unit; and

b. all 3-hour blocks of time during which the average temperature of the exhaust gases from each thermal incinerator did not comply with the temperature limitation specified above.

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.

3. The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the average hourly emissions and/or the rolling, 12-month VOC emissions from K014 exceeded the limits in Section A.I.1.

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

V. Testing Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Modification Permit to Install #13-3562, issued on February 4, 2003: A.V.2, A.V.3, A.V.4, A.V.5, A.V.6, and A.V.7. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

2. The permittee shall conduct, or have conducted, VOC emission testing for this emissions unit within 6 months after the issuance of this permit, during the third year of the permit, and 6 months prior to permit expiration.

2.a The emission testing shall be conducted to demonstrate compliance with the 80% capture efficiency and 90% control efficiency requirements.

2.b The following test methods shall be employed:

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 USEPA'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.)

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) and the pounds VOC per hour emission rate shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10(C). 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.

Alternative USEPA-approved test methods may be used with prior approval from the Ohio EPA.

V. Testing Requirements (continued)

3. The tests 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.

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 tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission tests.

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the tests, 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.

A comprehensive written report on the results of the emissions tests 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 tests. 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.

4. Emission Limitation:
VOC emissions shall not exceed 31.85 pounds per hour.

Applicable Compliance Method:
Compliance shall be demonstrated based upon the test methods and procedures specified in Section A.V.2 and the record keeping requirements specified in Section A.III.4.

5. Emission Limitation:
VOC emissions shall not exceed 28.8 tons per year (TPY) as a rolling, 12-month summation.

Applicable Compliance Method:
Compliance shall be demonstrated based upon the record keeping requirements specified in Section A.III.4.

6. USEPA Method 24 (40 CFR Part 60, Appendix A) shall be used to determine the VOC contents of the coatings.

7. USEPA Method 24 (40 CFR Part 60, Appendix A) or formulation data shall be used to determine the VOC contents of the cleanup materials.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
six (6) color flexographic printing press #9 equipped with a regenerative thermal incinerator system consisting of two incinerators with one inlet and one exhaust from the incinerator system (the two incinerators act as one unit; either or both incinerators may operate)		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Air Toxic Policy Clarifying Language

The permit to install for this emissions unit (K014) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Propylene Glycol Monomethyl Ether (PGME)

TLV (ug/m^3): 368,596

Maximum Hourly Emission Rate (pounds/hour): 31.85

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m^3): 352

MAGLC (ug/m^3): 8,776

III. Monitoring and/or Record Keeping Requirements (continued)

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

3. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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