Facility ID: 0684020020 Issuance type: Draft State Permit To Operate

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

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

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

Facility ID: 0684020020 Emissions Unit ID: K011 Issuance type: Draft State Permit To Operate

Go to the top of this document

Part II - Special Terms and Conditions

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

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

   (a) None.

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

   (a) None.

A. **Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Embosser 3	OAC rule 3745-31-05(A)(3) (PTI 06-07711 issued 12/28/04)	Volatile organic compound (VOC) emissions shall not exceed 334 pounds per day, calculated as a monthly average. The VOC content of the coatings (including inks and adhesives) employed in this emissions unit shall not exceed 2.0 pounds of VOC per gallon of coating, excluding water and exempt solvents. The requirements of this rule also include compliance with the requirements of 40 CFR Part 60, Subpart FFF.
	OAC rule 3745-35-07(B)(2)	VOC emissions shall be less than 39.0 tons per year, including cleanup materials, based on a rolling, 12-month summation. Total combined VOC emissions from K003, K004, K005, K007, K008, K011, and K012 shall not exceed 65.4 tons per year, including cleanup materials, based on a rolling, 12-month summation.
	40 CFR Part 60, Subpart FFF	The weighted average VOC content of all inks employed in this emissions unit shall be less than 1.0 kilogram VOC per kilogram of ink solids. See sections A.2.a and A.2.b below.
	OAC rule 3745-21-09(H)	The requirements of this rule are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).

2. **Additional Terms and Conditions**

   (a) For the purpose of determining compliance with the requirements of 40 CFR Part 60, Subpart FFF, an ink is defined as any mixture of ink, coating solids, organic solvents including dilution solvent, and water that is applied to the web of flexible vinyl or urethane on a rotagravure printing line.
   All inks employed in this emissions unit contain less than 1.0 kilogram VOC per kilogram ink solids. Therefore, it is not necessary to maintain records of the weighted average VOC content.

B. **Operational Restrictions**

1. None

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

1. The permittee shall collect and record the following information on a monthly basis for emissions units K003, K004, K005, K007, K008, K011, and K012:

   a. the name and identification of each coating (including inks and adhesives) and cleanup material employed;

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

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

d. the VOC content of each coating, in pounds per gallon, excluding water and exempt solvents;

e. the number of gallons of each coating employed;

f. the total VOC emissions from all coatings and cleanup materials employed, in tons; and

g. the rolling, 12-month summation of VOC emissions from all coatings and cleanup materials employed, in tons.

2. The permittee shall collect and record the following information on a monthly basis for this emissions unit:

a. the name and identification of each coating (including inks and adhesives), and cleanup material employed;

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

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

d. the VOC content of each coating, in pounds per gallon, excluding water and exempt solvents;

e. the VOC content of each ink, in kilograms per kilogram of ink solids;

f. the number of gallons of each coating employed;

g. the total VOC emissions from all coatings and cleanup materials employed, in tons;

h. the number of days in which the emissions unit operated;

i. the average daily VOC emissions, in pounds; and

j. the rolling, 12-month summation of VOC emissions from all coatings and cleanup materials employed, in tons.

D. **Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports to the Ohio EPA Southeast District Office that identify any monthly record showing:

a. the use of noncomplying coatings or inks (i.e., for VOC content);

b. an exceedence of the daily VOC emission limitation for this emissions unit;

c. an exceedence of the rolling, 12-month combined VOC emission limitation for K003, K004, K005, K007, K008, K011, and K012; and/or

d. an exceedence of the rolling, 12-month VOC emission limitation for this emissions unit.

2. Deviation (excursion) reports shall be submitted in accordance with the General Terms and Conditions of this permit.

E. **Testing Requirements**

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

VOC emissions shall not exceed 334 pounds per day, calculated as a monthly average.

Applicable Compliance Method:

Compliance with the daily VOC emission limitation shall be demonstrated through the record keeping required in section C.2.
Emission Limitation:

VOC emissions shall be less than 39.0 tons per year, including cleanup materials, based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual VOC emission limitation shall be demonstrated through the record keeping required in section C.2.
Emission Limitation:

The VOC content of the coatings (including inks and adhesives) employed in this emissions unit shall not exceed 2.0 pounds of VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance with the VOC content limitation shall be demonstrated through the record keeping required in section C.2.
Emission Limitation:

Total combined VOC emissions from emissions units K003, K004, K005, K007, K008, K011, and K012 shall not exceed 65.4 tons per year, including cleanup materials, based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the combined annual VOC emission limitation shall be demonstrated through the record keeping required in section C.1.
Emission Limitation:

The weighted average VOC content of any ink employed in this emissions unit shall be less than 1.0 kilogram VOC per kilogram of ink solids.

Applicable Compliance Method:

Compliance with the VOC content limitation shall be demonstrated through the record keeping required in section C.2.

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

F. **Miscellaneous Requirements**

1. None