John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

5/14/2014

Certified Mail

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
No	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

James Phillips
The Ohio Art Company
One Toy Street
Bryan, OH 43506

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0386010161
Permit Number: P0116822
Permit Type: Renewal
County: Williams

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

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

How to appeal this permit

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

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

How to save money, reduce pollution and reduce energy consumption

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

How to give us feedback on your permitting experience

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

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: Ohio EPA-NWDO

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
The Ohio Art Company

Facility ID:	0386010161
Permit Number:	P0116822
Permit Type:	Renewal
Issued:	5/14/2014
Effective:	5/14/2014
Expiration:	5/14/2019

Division of Air Pollution Control
Permit-to-Install and Operate
for
The Ohio Art Company

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Authorization

Facility ID:	0386010161
Application Number(s):	A0049285
Permit Number:	P0116822
Permit Description:	Renewal FEPTIO for multiple miscellaneous metal parts coating and printing lines.
Permit Type:	Renewal
Permit Fee:	$0.00
Issue Date:	5/14/2014
Effective Date:	5/14/2014
Expiration Date:	5/14/2019
Permit Evaluation Report (PER) Annual Date:	Apr 1 - Mar 31, Due May 15

This document constitutes issuance to:

The Ohio Art Company
One Toy Street
Bryan, OH 43506

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

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

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419)352-8461

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s))listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director

Authorization (continued)

Permit Number: P0116822
Permit Description: Renewal FEPTIO for multiple miscellaneous metal parts coating and printing lines.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	**K007**
Company Equipment ID:	Coating Line C-7
Superseded Permit Number:	P0115767
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K010**
Company Equipment ID:	UV#1 4ClrCoat/Press
Superseded Permit Number:	P0115767
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K011**
Company Equipment ID:	LTG Coater C-6
Superseded Permit Number:	P0115767
General Permit Category and Type:	Not Applicable

Group Name: Printing Lines

Emissions Unit ID:	**K004**
Company Equipment ID:	Printing Line P-4
Superseded Permit Number:	P0115767
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**K005**
Company Equipment ID:	Printing Line P-5
Superseded Permit Number:	P0115767
General Permit Category andType:	Not Applicable

Group Name: Roller Coating

Emissions Unit ID:	**K001**
Company Equipment ID:	Coating Line C-1
Superseded Permit Number:	P0115767
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**K002**
Company Equipment ID:	Coating Line C-2
Superseded Permit Number:	P0115767
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**K003**
Company Equipment ID:	Coating Line C-3
Superseded Permit Number:	P0115767
General Permit Category andType:	Not Applicable

A. Standard Terms and Conditions

1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

  You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions of this permit will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the [DO/LAA] in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. “Shut down” means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as beingpermanently shut down without first applying for and obtaining a permit pursuantto OAC Chapter 3745-31.

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the

change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

B. Facility-Wide Terms and Conditions

1. 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).

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

      (1) None.

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

      (1) None.

2. All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

C. Emissions Unit Terms and Conditions

1. K007, Coating Line C-7

Operations, Property and/or Equipment Description:

Coating Line C-7

a) 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. b)(1)a., b)(2)a., b)(2)b., b)(2)c., c)(1) through c)(5), d)(1) through d)(8), e)(1), and f)(1)a. through f)(1)j.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)	16.88 lbs organic compounds (OC)/hr from coating and thinning operations [See b)(2)a. and b)(2)b.] 75.78 tons OC/rolling, 12-month period from coating and thinning operations for emissions units K001 through K003, K007, and K011 combined [See b)(2)b., b)(2)c.i. and c)(1)] 7.50 tons OC/rolling, 12-month period from cleanup operations for emissions units K001 through K005, K007, K010, and K011 combined [See b)(2)c.ii. and c)(2) through c)(4)] 9.9 tons per rolling, 12-month period for any individual Hazardous Air Pollutant

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		(HAP) and 24.9 tons per rolling, 12-month period for any combination of HAPs for emissions units K001 through K005, K007, K010, and K011 combined [See b)(2)c.iii.]
b.	OAC rule 3745-21-09(B)(6) [in lieu of OAC rule 3745-21-09(U)(1)]	See b)(2)d.

(2) Additional Terms and Conditions

a. The emissions limitation of 16.88 lbs OC/hr was established to reflect the potential to emit for this emissions unit. Therefore, no record keeping, deviation reporting or compliance method calculations are required to demonstrate compliance with this limitation.

b. Emissions unit K007 shall be equipped with a thermal incinerator that shall achieve not less than ninety percent reduction, by weight, in the overall OC emissions from the coating line and not less than ninety percent, by weight, destruction for the OC emissions vented to the thermal incinerator.

c. The permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Title V and Maximum Achievable Control Technology (MACT) regulations:

i. 75.78 tons OC/rolling, 12-month period from coating and thinning operations for emissions units K001 through K003, K007, and K011 based on coating and thinning content and usage restrictions [See c)(1)]. For purposes of federal enforceability, emission limitations on OC effectively restrict volatile organic compound (VOC) emissions;

ii. 7.50 tons OC/rolling, 12-month period from cleanup operations for emissions units K001 through K005, K007, K010, and K011 combined [See c)(2), c)(3), and c)(4)]. For purposes of federal enforceability, emission limitations on OC effectively restrict VOC emissions; and

iii. 9.90 tons per rolling, 12-month period for any individual HAP and 24.9 tons per rolling, 12-month period for any combination of HAPs for emissions units K001 through K005, K007, K010, and K011 combined.

d. The emission limitation specified by this rule is less stringent in regards to overall control efficiency than the emission limitation established pursuant to OAC rule 3745-31-05(D).

c) Operational Restrictions

(1) The maximum annual coating and thinner usage for emissions units K001 through K003 K007 and K011, combined, shall not exceed any of the following:

a. 207,000 gallons of coating per rolling, 12-month period with a maximum OC content of 7.0 lbs/gallon; and

b. 7,000 gallons of thinner per rolling, 12-month period with a maximum OC content of 9.5 lbs/gallon.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the coating and thinner usage, upon issuance of this permit.

(2) The maximum annual cleanup material usage for emissions units K001 through K005, K007,K010 and K011 combined shall not exceed 22,500 gallons per rolling, 12-month period.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the cleanup material usage, upon issuance of this permit.

(3) The OC content of any cleanup material employed in this emissions unit shall not exceed 9.5 lbs/gallon.

(4) All solvent and solvent containing material (i.e. rags) shall be reclaimed after cleanup operations have been completed. The solvent and solvent containing material shall be reclaimed by storing in closed containers except during the addition or removal of solvents/materials.

(5) The permittee shall operate the thermal incinerator whenever the emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

(1) The permitee shall collect and record the following information each month for all coatings and thinners employed in emissions unit K001 through K003, K007, and K011 combined:

a. the name and identification number of each coating/thinner employed;

b. the OC content, in lbs/gallon, for each coating/thinner;

c. the number of gallons of each coating/thinner employed;

d. the OC emissions, in lbs, from each coating/thinner, [d)(1)b. x d)(1)c.];

e. the OC emissions, in tons, from all coatings/thinners [summation of d)(1)d. x 1 ton/2000 lbs];

f. the rolling, 12-month summation of the OC emissions, in tons; and

g. the rolling, 12-month summation of coating/thinner usage, in gallons.

(2) The permittee shall collect and record the following information each month for all cleanup materials employed in emissions units K001 through K005, K007, K010, and K011 combined:

a. the name and identification number of each cleanup material employed;

b. the OC content of each cleanup material employed, in lbs/gallon;

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

d. the mass (lbs) of OC applied for each cleanup material employed [d)(2)b. x d)(2)c.];

e. the mass (lbs) of OC applied for all cleanup material employed [summation of d)(2)d.]

f. the rolling, 12-month summation of the OC emissions [calculated by applying a 7% solvent loss rate (0.07) during cleanup operations to the total OC emissions from all cleanup materials employed, d)(2)e. x 0.07 x 1 ton/2000lbs]; and

g. the rolling, 12-month summation of cleanup material usage, in gallons.

(3) The permittee shall collect and record the following information regarding HAP emissions each month for emissions units K001 through K005, K007, K010, and K011 combined:

a. the company identification of each coating, thinner, ink, and cleanup material employed;

b. the pounds per gallon of each HAP in each coating, thinner, ink, and cleanup material,

c. the number of gallons of each coating, thinner, ink, and cleanup material employed;

d. the total emission rate for each HAP from all coatings, thinners, inks, and cleanup materials employed [summation of each HAP emissions rate [d)(3)b. x d)(3)c.] for each individual coating, thinner, and cleanup material*], in lbs/month;

*calculations for HAP emissions from cleanup operations can take into account a solvent loss rate of 7%.

e. the total HAP emission rate for the combination of all HAPs from all coatings, thinners, inks, and cleanup materials employed [summation of d)(3)d. for all HAPs], in lbs/month; and

f. the rolling, 12-month summation of the individual HAPs and all HAPs combined.

(4) The permittee shall certify each month in a written statement that all cleanup operations are in compliance with the operation restriction specified in c)(4).

(5) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit(s) controlled by the thermal oxidizer is/are in operation, shall not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance.

(6) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal oxidizer when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:

a. all 3-hour blocks of time, when the emissions unit(s) controlled by the thermal oxidizer was/were in operation, during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance; and

b. a log (date and total time) of the downtime or bypass of the capture (collection) system and thermal oxidizer, and/or downtime of the monitoring equipment, when the associated emissions unit(s) was/were in operation.

These records shall be maintained at the facility for a period of three years.

(7) Whenever the monitored average combustion temperature within the thermal oxidizer deviates from the range or limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

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

e. the findings and recommendations.

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

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

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

j. the temperature readings immediately after the corrective action was implemented; and

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

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

The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted temperature range/limit based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(s). In addition, approved revisions to the temperature range/limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

(8) The permittee shall maintain daily records that document any time periods when the thermal incinerator was not in service when the emissions unit was in operation.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. 75.78 tons OC per rolling, 12-month period from coating and thinning operations for emissions units K001 through K003, K007, and K011 combined;

ii. the maximum annual coating usage rate of 207,000 gallons for emissions units K001 through K003, K007, and K011 combined, based upon a rolling, 12-month summation of the monthly coating usage rates;

iii. the maximum allowable coating OC content specified in c)(1)a. of this permit.

iv. the maximum annual thinner usage rate of 7,000 gallons for emissions units K001 through K003, K007, and K011 combined, based upon a rolling, 12-month summation of the monthly thinner usage rates;

v. the maximum allowable thinner OC content specified in c)(1)b. of this permit.

vi. the 7.50 tons OC per rolling, 12-month period from cleanup operations for emissions units K001 through K005, K007, K010 and K011 combined;

vii. the maximum annual cleanup usage rate of 22,500 gallons for emissions units K001 through K005, K007, K010 and K011 combined, based upon a rolling, 12-month summation of the monthly cleanup usage rates;

viii. the maximum allowable cleanup OC content specified in c)(3) of this permit;

ix. the operational restriction specified c)(4) requiring reclaim of cleanup solvents and materials;

x. the rolling individual HAP and combined HAPs emission limitations specified in b)(2)c.iii. of this permit;

xi. each period of time (start time and date, and end time and date)when the average combustion temperature within the thermal oxidizer was outside of the acceptable range;

xii. any period of time (start time and date, and end time and date)when the emissions unit(s) was/were in operation and the process emissions were not vented to the thermal oxidizer;

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, thepermittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted,electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) Compliance with the emission limitations in Section b)(1) of these terms and conditions shall be determined in accordance with the following method(s):

a. Emission Limitation:

16.88 lbs OC/hr from coating and thinning operations

Applicable Compliance Method:

The hourly emission limitation represents the potential to emit* of the emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*The potential to emit was developed by summing the following:

the maximum hourly coating usage (15.75 gal/hr) x the maximum coating OC content (7.0 lbs/gallon coating) x 90% overall control + the maximum hourly thinner usage (0.98 gal/hr) x the maximum thinner OC content (9.5 lbs/gallon) x 90% overall control.

b. Emission Limitation:

75.78 tons OC/rolling, 12-month period from coating and thinning operations for emissions units K001 through K003, K007, and K011 combined.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in d)(1) of this permit.

c. Emission Limitation:

7.50 tons OC/rolling, 12-month period from cleanup operations for emissions units K001 through K005, K007, K010, and K011 combined.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in d)(2) of this permit.

d. Emission Limitations:

9.9 tons per rolling, 12-month period for any individual HAP and 24.9 tons per rolling, 12-month period for any combination of HAPs for emissions units K001 through K005, K007, K010, and K011 combined.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in d)(3) of this permit.

e. Emission Limitation:

The maximum annual coating usage for emissions units K001 through K003, K007, and K011 combined shall not exceed 207,000 gallons per year, based on a rolling, 12-month summation of the coating usage.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in d)(1) of this permit.

f. Emission Limitation:

The maximum annual thinner usage for emissions units K001 through K003, K007, and K011 combined shall not exceed 7,000 gallons per year, based on a rolling, 12-month summation of the thinner usage.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in d)(1) of this permit.

g. Emission Limitation:

The maximum annual cleanup usage for emissions unit K001 through K005, K007, K010, and K011 combined shall not exceed 22,500 gallons per year, based on a rolling, 12-month summation of the cleanup usage.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in d)(2) of this permit.

h. Emission Limitation:

The OC content for all coatings employed in this emissions unit shall not exceed 7.0 lbs/gallon.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in d)(1) of this permit.

i. Emission Limitation:

The OC content for all thinners employed in this emissions unit shall not exceed 9.5 lbs/gallon.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in d)(1) of this permit.

j. Emission Limitation:

The OC content for all cleanup materials employed in this emissions unit shall not exceed 9.5 lbs OC/gallon.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in d)(2) of this permit.

g) Miscellaneous Requirements

(1) None.

2. K010, UV#1 4ClrCoat/Press

Operations, Property and/or Equipment Description:

4 color lithographic press with trailing (UV) coater. Administrative modification to PTI 03-13026 previously issued on May 13, 2006 to allow for change in permit allowables.

a) 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. g)(1)

(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. b)(1)b., b)(2)b.i through b)(2)b.iii., c)(1) through c)(4), d)(1), d)(3) through d)(5), e)(1), f)(1)b and f)(1)c. through f)(1)l.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05 (A) (3)(a)	0.75 pound of volatile organic compound (VOC) per gallon of coating, excluding water and exempt solvents 7.78 lbs organic compound (OC)/hr from coating and printing operations [See b)(2)a. and c)(1)] 1035 lbs OC/month & 6.21 tons OC/yr from cleanup operations
b.	OAC rule 3745-31-05 (D)	4.5 tons OC/rolling, 12-month period from coating and printing operations (See b)(2)b.i.) 7.5 tons OC/rolling, 12-month period from cleanup operations for emissions units K001 through K005, K007, K010, and

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		K011, combined [See b)(2)b.ii. and c)(2) through c)(4)] 9.9 tons per rolling, 12-month period for any individual Hazardous air Pollutant (HAP) and 24.9 tons per rolling, 12-month period for any combination of HAPs for emissions unit K001 through K005, K007, K010, and K011 combined [See b)(2)b.iii.]
c.	OAC rule 3745-21-09 (U)(1) (i)	See b)(2)c.
d.	ORC 3704.03(F)(4)(b) OAC rule 3745-114-01	See g)(1)

(2) Additional Terms and Conditions

a. The emission limitation of 7.78lbs OC/hr was established to reflect the potential to emit for this emissions unit. Therefore, no record keeping, deviation reporting or compliance method calculations are required to demonstrate compliance with this limitation.

b. The permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Title V and Maximum Achievable Control Technology (MACT) regulations:

i. 4.5 tons OC/rolling, 12-month period from coating and printing operations based on coating and printing content and usage restrictions [see c)(1)]. For purposes of federal enforceability, emission limitations on OC effectively restrict volatile organic compound (VOC) emissions.

A federally enforceable limitation of 4.50 tons OC per rolling, 12-month period was initially established in a permit issued on December 13, 2006 and as such the facility has existing records of OC emissions in lieu of establishing monthly OC emissions restrictions for the first year of operation.

ii. 7.5 tons OC/rolling, 12-month period from cleanup operations for emissions units K001 through K005, K007, K010, and K011 combined [See c)(2), c)(3) & c)(4)].

A federally enforceable limitation of 7.5 tons OC per rolling, 12-month period was initially established in a permit issued on December 13, 2006 and as such the facility has existing records of OC emissions in lieu of establishing monthly OC emissions restrictions for the first year of operation.

iii. 9.90 tons per rolling, 12-month period for any individual HAP and 24.9 tons per rolling, 12-month period for any combination of HAPs for emissions units K001 through K005, K007, K010, and K011 combined.

Federally enforceable limitations of 9.9 tons of any individual HAP and 24.9 tons of any combination of HAPs per rolling, 12-month period were initially established in a permit issued on December 13, 2006 and as such the facility has existing records of HAP emissions in lieu of establishing monthly OC emissions restrictions for the first year of operation.

c. The emission limitation established by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A) (3) (a).

c) Operational Restrictions

(1) The maximum annual coating and ink usage for this emissions unit shall not exceed any of the following

a. 6,600 gallons of coating with a maximum OC content of 0.75 lb/gallon.

b. 100,000 lbs of ink with a maximum OC content of 0.04 lb OC/lb ink.

(2) The maximum annual cleanup material usage for emissions units K001 through K005, K007, K010, and K011, combined, shall not exceed 22,500 gallons per rolling, 12-month period.

(3) The OC content of any cleanup material employed in this emissions unit shall not exceed 9.5 lbs/gallon.

(4) All solvent and solvent containing material (i.e. rags) shall be reclaimed after cleanup operations have been completed. The solvent and solvent containing material shall be reclaimed by storing in closed containers except during the addition or removal of solvents/materials.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for all coatings and inks employed in this emissions unit:

a. the name and identification number of each coating/ink employed, as applied;

b. the number of gallons of each coating employed;

c. the VOC content of each coating (excluding water and exempt solvents), in lbs/gallon as applied [the VOC content shall be calculated in accordance with the equation specified in paragraph (B) (8) of OAC rule 3745-21-10 for $CVOC_{,2}$;

d. the pounds of each ink employed;

e. the OC content of each coating employed, as applied, in lbs/gallon;

f. the OC content of each ink employed , in lbs OC/lb ink;

g. the annual OC emissions, in tons from all coatings/inks, based upon a rolling, 12-month summation [d)(1) b. times d)(1)e. plus d)(1)d times d)(1)f. times 1 ton/2000 lbs]; and

h. the rolling, 12-month summation of coating usage, in gallons, and ink usage in pounds.

(2) The permittee shall collect and record the following information each month for cleanup materials employed in this emissions unit:

a. the name and identification number of each cleanup material employed;

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

c. the OC content of each cleanup material employed;

d. the mass (lbs) of OC applied for each cleanup material employed [d)(2)b. x d)(2)c.];

e. the mass (lbs) of OC applied for all cleanup material employed [summation of d)(2)d.];

f. the total OC emissions from all cleanup materials [calculated by applying a 7% solvent loss rate (0.07) during cleanup operations to the total OC emissions from all cleanup materials employed, d)(2)e. x 0.07], in lbs/month; and

g. the annual year-to-date OC emissions from all cleanup materials employed [summation of d)(2)f. for each calendar month to date from January to December].

(3) The permittee shall collect and record the following information each month for all cleanup materials employed in emissions units K001 through K005, K007, K010, K011, combined:

a. the name and identification number of each cleanup material employed;

b. the OC content of each cleanup material employed, in lbs/gallon;

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

d. the mass (lbs) of OC applied for each cleanup material employed [d)(3)b. x d)(3)c.];

e. the mass (lbs) of OC applied for all cleanup material employed [summation of d)(3)d.]

f. the rolling, 12-month summation of the OC emissions [calculated by applying a 7% solvent loss rate (0.07) during cleanup operations to the total OC emissions from all cleanup materials employed, d)(3)e. x 0.07 x 1 ton/2000lbs]; and

g. the rolling, 12-month summation of cleanup material usage, in gallons.

(4) The permittee shall collect and record the following information regarding HAP emissions each month for emissions units K001 through K005, K007, K010, and K011 combined:

a. the company identification of each coating, thinner, ink and cleanup material employed;

b. the pounds per gallon of each HAP in each coating, thinner, ink, and cleanup material employed;

c. the number of gallons of each coating, thinner, ink, and cleanup material employed;

d. the total emissions rate for each HAP from all coatings, thinners, inks, and cleanup materials employed (summation of each HAP emissions rate [d)(4)b. times d)(4)c. for each individual coating, thinner, ink, and cleanup material*], in lbs/month

*calculations for HAP emissions from cleanup operations can take into account a solvent loss rate of 7%

e. the total HAP rate for the combination of all HAPs from all coatings, thinners, inks, and cleanup materials employed (summation of d)(4)d. for all HAPs), in lbs/month; and

f. the annual emissions of each individual HAP and all HAPs combined, based upon a rolling, 12-month summation of monthly HAP emissions.

(5) The permittee shall certify each month in a written statement that all cleanup operations are in compliance with the operation restriction specified in c)(4).

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the Potential to Emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. 4.5 tons OC per rolling, 12-month period from coating and printing operations;

ii. 9.9 tons individual HAP per rolling, 12-month period for emissions units K001 through K005, K007, K010, and K011 combined;

iii. 24.9 tons combined HAPs per rolling, 12-month period for emissions units K001 through K005, K007, K010, and K011 combined;

iv. 6,600 gallons of coating per rolling, 12-month period for emissions unit K010;

v. 0.75 lbs OC/gallon of coating employed in emissions unit K010;

vi. 100,000 lbs ink per rolling, 12-month period for emissions unit K010;

vii. 0.04 lb OC/lb ink employed in emissions unit K010;

viii. 22,500 gallons of cleanup material per rolling, 12-month period for emissions units K001 through K005, K007, K010, and K011;

ix. 9.5 lbs OC/gallon from cleanup material employed in emissions unit K010;

x. the operational restriction specified c)(4) requiring reclaim of cleanup solvents and materials; and

xi. 7.5 tons OC per rolling, 12-month period from cleanup operations.

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted (postmarked) each year by the thirty-first of January (covering October to December), the thirtieth of April (covering January to March), the thirty-first of July (covering April to June), and the thirty-first of October (covering July to September), unless an alternative schedule has been established and approved by the director (the appropriate district office or local air agency).

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) Compliance with the emission limitations in section b)(1) of these terms and conditions shall be determined in accordance with the following method(s):

a. <u>Emission Limitation:</u>

7.78 lbs OC/hr from coating operations

Applicable Compliance Method:

The hourly emission limitation represents the potential to emit* of the emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*The potential to emit is based on the following:

the maximum hourly coating usage rate (6.8 gal/hr) x the maximum coating OC content (0.75 lb/gallon coating) + the maximum hourly ink usage rate (67 lbs/hr) x the maximum ink OC content (0.04 lb OC/lb ink)

b. Emission Limitation:

0.75 pound VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in d)(1) of this permit.

c. Emission Limitations:

1035 lbs OC/month & 6.21 tons OC/yr from cleanup operations

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in d)(2) of this permit.

d. Emission Limitation:

4.5 tons OC/rolling, 12-month period from coating and printing operations

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in d)(1) of this permit.

e. Emission Limitation:

7.5 tons OC/rolling, 12-month period from cleanup operations for emissions units K001 through K005, K007, K010, and K011 combined

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in d)(3) of this permit.

f. Emission Limitations:

9.9 tons per rolling, 12-month period for any individual HAP and 24.9 tons per rolling, 12-month period for any combination of HAPs for emission units K001 through K005, K007, K010, and K011 combined

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in d)(4) of this permit.

g. Emission Limitation:

The maximum annual coating usage for emissions unit K010 shall not exceed 6,600 gallons per year, based on a rolling, 12-month summation of coating usage.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in d)(1) of this permit.

h. Emission Limitation:

The maximum annual ink usage for emissions unit K010 shall not exceed 100,000 lbs per year, based on a rolling, 12-month summation of ink usage.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in d)(1) of this permit.

i. Emission Limitation:

The OC content for all inks employed in this emissions unit shall not exceed 0.04 lbs OC/lb ink.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in d)(1) of this permit.

j. Emission Limitation:

The maximum annual cleanup usage for emissions unit K001 through K005, K007, K010, and K011 combined shall not exceed 22,500 gallons per year, based on a rolling, 12-month summation of the cleanup usage

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in d)(3) of this permit.

k. Emission Limitation:

The OC content for all cleanup materials employed in this emissions unit shall not exceed 9.5 lbs OC/gallon.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in d)(2) of this permit.

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

g) Miscellaneous Requirements

(1) Modeling to demonstrate compliance with, the “Toxic Air Contaminant Statute”, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit’s maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

3. K011, LTG Coater C-6

Operations, Property and/or Equipment Description:

LTG Coater C-6

a) 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. d)(10) through d)(13).

(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. b)(1)a., b)(2)b., b)(2)c., c)(1) through c)(5), d)(1), d)(3) through d)(8), e)(1), and f)(1)c. through f)(1)k.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)	75.78 tons organic compound (OC)/rolling, 12-month period from coating and thinning operations for emissions unit K001 through K003, K007, and K011 combined [See b)(2)b., b)(2)c.i. and c)(1)] 7.50 tons OC/rolling, 12-month period from cleanup operations for emissions unit K001 through K005, K007, K010, and K011 combined [See b)(2)c.ii. and c)(2) through c)(4)] 9.9 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 24.9 tons per rolling, 12-month period for any combination of HAPs for emissions units K001 through K005,

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		K007, K010, and K011 combined [See b)(2)c.iii.]
b.	OAC rule 3745-31-05(A)(3)	5.36 lbs OC/hr& 23.5 tons OC/yr from coating and thinning operations [See b)(2)a. & b)(2)b.] 1808 lbs OC/month & 10.9 tons OC/yr from cleanup operations 1.92 lbs nitrogen oxide (NOx)/hr and 8.41 tons/yr 0.66 lb carbon monoxide (CO)/hr and 2.89 tons/yr
c.	OAC rule 3745-21-09(B)(6) [in lieu of OAC rule 21-09(U)(1)]	See b)(2)d.

(2) Additional Terms and Conditions

a. The emission limitation of 5.36 lbs OC/hr was established to reflect the potential to emit for this emission unit. Therefore, no record keeping, deviation reporting or compliance method calculations are required to demonstrate compliance with this limitation.

b. Emissions unit K011 shall be equipped with a thermal incinerator that shall achieve not less than ninety-eight percent reduction, by weight, in the overall OC emissions from the coating line and not less than ninety percent, by weight, destruction for the OC emissions vented to the thermal incinerator.

c. The permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Title V and Maximum Achievable Control Technology (MACT) regulations:

i. 75.78 tons OC/rolling, 12-month period from coating and thinning operations for emissions units K001 through K003, K007, and K011 based on coating and thinning content and usage restrictions [See c)(1)]. For purposes of federal enforceability, emission limitations on OC effectively restrict volatile organic compound (VOC) emissions;

ii. 7.50 tons OC/rolling, 12-month period from cleanup operations for emissions units K001 through K005, K007, K010, and K011 combined [See c)(2), c)(3), and c)(4)]. For purposes of federal enforceability, emission limitations on OC effectively restrict VOC emissions; and

iii. 9.90 tons per rolling, 12-month period for any individual HAP and 24.9 tons per rolling, 12-month period for any combination of HAPs for emissions units K001 through K005, K007, K010, and K011 combined.

d. The emission limitation specified by this rule is less stringent in regards to overall control efficiency than the emission limitation established pursuant to OAC rule 3745-31-05 (A) (3).

c) Operational Restrictions

(1) The maximum annual coating and thinner usage for emissions units K001 through K003, K007, and K011 combined shall not exceed any of the following:

a. 207,000 gallons of coating per rolling, 12-month period with a maximum OC content of 7.0 lbs/gallon; and

b. 7,000 gallons of thinner per rolling, 12-month period with a maximum OC content of 9.5 lbs/gallon.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the coating and thinner usage, upon issuance of this permit.

(2) The maximum annual cleanup material usage for emissions units K001 through K005, K007, K010, and K011 combined shall not exceed 22,500 gallons per rolling, 12-month period.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the cleanup material usage, upon issuance of this permit.

(3) The OC content of any cleanup material employed in this emissions unit shall not exceed 9.5 lbs/gallon.

(4) All solvent and solvent containing material (i.e. rags) shall be reclaimed after cleanup operations have been completed. The solvent and solvent containing material shall be reclaimed by storing in closed containers except during the addition or removal of solvents/materials.

(5) The permittee shall operate the thermal incinerator whenever the emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for all coatings and thinners employed in emissions unit K001 through K003, K007 and K011, combined:

a. the name and identification number of each coating/thinner employed;

b. the OC content, in lbs/gallon, for each coating/thinner;

c. the number of gallons of each coating/thinner employed;

d. the OC emissions, in lbs, from each coating/thinner, [d)(1)b. x d)(1)c.];

e. the OC emissions, in tons, from all coatings/thinners [summation of d)(1)d. x 1 ton/2000 lbs];

f. the rolling, 12-month summation of the OC emissions, in tons; and

g. the rolling, 12-month summation of coating/thinner usage, in gallons.

(2) The permittee shall collect and record the following information each month for all cleanup materials employed in emissions unit K011:

a. the name and identification number of each cleanup material employed;

b. the OC content of each cleanup material employed, in lbs/gallon;

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

d. the mass (lbs) of OC applied for each cleanup material employed [d)(2)b. x d)(2)c.];

e. the mass (lbs) of OC applied for all cleanup material employed [summation of d)(2)d.];

f. the total OC emissions from all cleanup materials [calculated by applying a 7% solvent loss rate (0.07) during cleanup operations to the total OC emissions from all cleanup materials employed, d)(2)e. x 0.07], in lbs/month; and

g. the annual year-to-date OC emissions from all cleanup materials employed [summation of d)(2)f. for each calendar month to date from January to December].

(3) The permittee shall collect and record the following information each month for all cleanup materials employed in emissions units K001 through K005, K007, K010 and K011, combined.

a. the name and identification number of each cleanup material employed;

b. the OC content of each cleanup material employed, in lbs/gallon;

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

d. the mass (lbs) of OC applied for each cleanup material employed [d)(2)b. x d)(2)c.];

e. the mass (lbs) of OC applied for all cleanup material employed [summation of d)(2)d.];

f. the rolling, 12-month summation of the OC emissions [calculated by applying a 7% solvent loss rate (0.07) during cleanup operations to the total OC emissions from all cleanup materials employed,d)(2)e. x 0.07 x 1 ton/2000lbs]; and

g. the rolling, 12-month summation of cleanup material usage, in gallons.

(4) The permittee shall collect and record the following information regarding HAP emissions each month for emissions units K001 through K005, K007, K010, and K011 combined:

a. the company identification of each coating, thinner, ink, and cleanup material employed;

b. the pounds per gallon of each HAP in each coating, thinner, ink, and cleanup material,

c. the number of gallons of each coating, thinner, ink, and cleanup material employed;

d. the total emission rate for each HAP from all coatings, thinners, inks, and cleanup materials employed [summation of each HAP emissions rate [d)(3)b. x d)(3)c.] for each individual coating, thinner, and cleanup material*], in lbs/month;

*calculations for HAP emissions from cleanup operations can take into account a solvent loss rate of 7%.

e. the total HAP emission rate for the combination of all HAPs from all coatings, thinners, inks, and cleanup materials employed [sum of d)(3)d. for all HAPs], in lbs/month; and

f. the rolling, 12-month summation of the individual HAPs and all HAPs combined.

(5) The permittee shall certify each month in a written statement that all cleanup operations are in compliance with the operation restriction specified in c)(4).

(6) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit(s) controlled by the thermal oxidizer is/are in operation, shall not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance.

(7) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal oxidizer when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:

a. all 3-hour blocks of time, when the emissions unit(s) controlled by the thermal oxidizer was/were in operation, during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance; and

b. a log (date and total time) of the downtime or bypass of the capture (collection) system and thermal oxidizer, and/or downtime of the monitoring equipment, when the associated emissions unit(s) was/were in operation.

These records shall be maintained at the facility for a period of three years.

(8) Whenever the monitored average combustion temperature within the thermal oxidizer deviates from the range or limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

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

e. the findings and recommendations.

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

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

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

j. the temperature readings immediately after the corrective action was implemented; and

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

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

The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted temperature range/limit based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(s). In addition, approved revisions to the temperature range/limit will not

constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

(9) The permittee shall maintain daily records that document any time periods when the thermal incinerator was not in service when the emissions unit was in operation.

(10) The permit to install for this emissions unit (K011) 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: Isophorone
TLV (mg/m3): 21,000
Maximum Hourly Emission Rate (lbs/hr): 0.653
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 38
MAGLC (ug/m3): 500

Pollutant: MIK
TLV (mg/m3): 205,000
Maximum Hourly Emission Rate (lbs/hr): 0.302
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 18
MAGLC (ug/m3): 4,881

Pollutant: Ethylene Glycol Monobutyl Ether
TLV (mg/m3): 121,000
Maximum Hourly Emission Rate (lbs/hr): 0.667
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 39
MAGLC (ug/m3): 2881

Pollutant: Mineral Spirits
TLV (mg/m3): 525,000
Maximum Hourly Emission Rate (lbs/hr): 0.253
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 15
MAGLC (ug/m3): 12,500

(11) 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.).

(12) 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

(13) 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.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. 75.78 tons OC per rolling, 12-month period from coating and thinning operations for emissions units K001 through K003, K007, and K011 combined;

ii. the maximum annual coating usage rate of 207,000 gallons for emissions units K001 through K003, K007, and K011 combined, based upon a rolling, 12-month summation of the monthly coating usage rates;

iii. the maximum allowable coating OC content specified in c)(1)a. of this permit.

iv. the maximum annual thinner usage rate of 7,000 gallons for emissions units K001 through K003, K007, and K011 combined, based upon a rolling, 12-month summation of the monthly thinner usage rates;

v. the maximum allowable thinner OC content specified in c)(1)b. of this permit.

vi. the 7.50 tons OC per rolling, 12-month period from cleanup operations for emissions units K001 through K005, K007, K010 and K011 combined;

vii. the maximum annual cleanup usage rate of 22,500 gallons for emissions units K001 through K005, K007, K010 and K011 combined, based upon a rolling, 12-month summation of the monthly cleanup usage rates;

viii. the maximum allowable cleanup OC content specified in c)(3) of this permit;

ix. the operational restriction specified c)(4) requiring reclaim of cleanup solvents and materials;

x. the rolling individual HAP and combined HAPs emission limitations specified in b)(2)c.iii. of this permit;

xi. each period of time (start time and date, and end time and date)when the average combustion temperature within the thermal oxidizer was outside of the acceptable range;

xii. any period of time (start time and date, and end time and date)when the emissions unit(s) was/were in operation and the process emissions were not vented to the thermal oxidizer;

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, thepermittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted,electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) Compliance with the emission limitations in section b)(1) of these terms and conditions shall be determined in accordance with the following method(s):

a. Emission Limitation:

5.36 lbs OC/hr& 23.5 tons OC/yr from coating and thinning operations

Applicable Compliance Method:

The hourly and annual emission limitations represent the potential to emit* of the emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*The potential to emit was based on the following:

The maximum hourly coating usage (36.93 gal/hr) x the maximum coating OC content (7.0 lbs/gallon) x 98% overall control + the maximum hourly thinner usage (0.98 gal/hr) x the maximum thinner OC content (9.5 lbs/gallon) x 98% overall control.

The annual OC potential to emit emission limitation was developed by multiplying a maximum hourly OC emission rate of 5.36 lbs OC/hr by a maximum annual operating rate of 8760 hrs/yr and dividing by an emission factor of 1 ton/2000 lbs.

b. Emission Limitation:

1808 lbs OC/month & 10.9 tons OC/yr from cleanup operations

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements specified in d)(2) of this permit.

c. Emission Limitation:

75.78 tons OC/rolling, 12-month period from coating and thinning operations for emissions units K001 through K003, K007, and K011 combined.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in d)(1) of this permit.

d. Emission Limitation:

7.50 tons OC/rolling, 12-month period from cleanup operations for emissions units K001 through K005, K007, K010, and K011 combined.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in d)(3) of this permit.

e. Emission Limitation:

9.9 tons per rolling, 12-month period for any individual HAP and 24.9 tons per rolling, 12-month period for any combination of HAPs for emissions units K001 through K005, K007, K010, and K011 combined.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in d)(4) of this permit.

f. Emission Limitation:

The maximum annual coating usage for emissions units K001 through K003, K007, and K011 combined shall not exceed 207,000 gallons per year, based on a rolling, 12-month summation of the thinner usage.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in d)(1) of this permit.

g. Emission Limitation:

The maximum annual thinner usage for emissions units K001 through K003, K007, and K011 combined shall not exceed 7,000 gallons per year, based on a rolling, 12-month summation of the thinner usage.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in d)(1) of this permit.

h. Emission Limitation:

The maximum annual cleanup usage for emissions unit K001 through K005, K007, K010, and K011 combined shall not exceed 22,500 gallons per year, based on a rolling, 12-month summation of the cleanup usage.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in d)(3) of this permit.

i. Emission Limitation:

The OC content for all coatings employed in this emissions unit shall not exceed 7.0 lbs/gallon

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in d)(1) of this permit.

j. Emission Limitation:

The OC content for all thinners employed in this emissions unit shall not exceed 9.5 lbs/gallon.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in d)(1) of this permit.

k. Emission Limitation:

The OC content for all cleanup materials employed in this emissions unit shall not exceed 9.5 lbs OC/gallon.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in d)(2) of this permit.

l. Emission Limitation:

NOx emissions shall not exceed 1.92 lbs/hr and 8.41 tons/yr from emissions unit K011 from the regenerative thermal oxidizer.

Applicable Compliance Method:

The emission limitation is based on emissions testing conducted on April 12, 2011, which was performed in accordance with test methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7.

The annual NOx emission limitation was developed by multiplying the short-term allowable NOx emission limitation (1.92 lbs/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, provided compliance is shown with the short-term allowable emission limitation, compliance with annual emission limitation shall also be demonstrated.

m. Emission Limitation:

CO emission shall not exceed 0.66 lb/hr and 2.89 tons/yr from emissions unit K011 from regenerative thermal oxidizer.

Applicable Compliance Method:

The hourly emission limitation was developed by multiplying a maximum heat input of 8 mmBtu/hrby the emission factor in AP-42, Chapter 1.4 (revised 7/98) of 84 lbs CO/million scf of natural gas, and dividing by 1020 mmBtu/mm cu. Ft. of natural gas.

The annual CO emission limitation was developed by multiplying the short-term allowable CO emission limitation (0.66 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, provided compliance is shown with the short-term allowable emission limitation, compliance with the annual emission limitation shall also be demonstrated.

g) Miscellaneous Requirements

(1) None.

4. Emissions Unit Group -Printing Lines: K004,K005,

EU ID	Operations, Property and/or Equipment Description
K004	Printing Line P-4
K005	Printing Line P-5

a) 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. b)(1)a., b)(2)a., c)(1) through c)(5), d)(1) through d)(4), e)(1), and f)(1)a. through f)(1)h.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)	10 tons OC/rolling, 12-month period from printing operations for emissions units K004 & K005 combined [See b(2)a.i, c)(1), and c)(2)] 7.50 tons OC/rolling, 12-month period from cleanup operations for emissions units K001 through K005, K007, K010, and K011 combined [See b)(2)a.ii., and c)(3) through c)(5)] 9.9 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 24.9 tons per rolling, 12-month period for any combination of HAPs for emissions units K001 through K005, K007, K010, and K011 combined [See

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		b)(2)a.iii.]
b.	OAC rule 3745-21-09(U)(1)(i)	3.0 pounds of VOC/gallon of coating, excluding water and exempt solvents for coatings not regulated under paragraphs (U)(1)(a) to (U)(1)(h)

(2) Additional Terms and Conditions

a. The permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Title V and Maximum Achievable Control Technology (MACT) regulations:

i. 10 tons OC/rolling 12-month period from printing operations for emissions units K004 & K005 combined based on ink content and usage restrictions [See c)(1) and c)(2)]. For purposes of federal enforceability, emission limitations on OC effectively restrict VOC emissions;

ii. 7.50 tons OC/rolling, 12-month period from cleanup operations for emissions units K001 through K005, K007, K010, and K011 combined [See c)(3) and c)(4)] For purposes of federal enforceability, emission limitations on OC effectively restrict VOC emissions; and

iii. 9.90 tons per rolling, 12-month period for any individual HAP and 24.9 tons per rolling, 12-month period for any combination of HAPs for emissions units K001 through K005, K007, K010, and K011 combined.

c) Operational Restrictions

(1) The maximum annual ink usage for emissions units K004 & K005 combined shall not exceed 100,000 pounds of ink per year, based on rolling, 12-month summation of the ink usage, in pounds.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the ink usage, upon issuance of this permit.

(2) The OC content of any ink employed in this emissions unit shall not exceed 0.20 lb OC/lb ink, as applied.

(3) The maximum annual cleanup material usage for emissions units K001 through K005, K007, K010, and K011 combined shall not exceed 22,500 gallons per rolling, 12-month period.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the cleanup material usage, upon issuance of this permit.

(4) The OC content of any cleanup material employed in this emissions unit shall not exceed 9.5 lbs/gallon.

(5) All solvent and solvent containing material (i.e. rags) shall be reclaimed after cleanup operations have been completed. The solvent and solvent containing material shall be reclaimed by storing in closed containers except during the addition or removal of solvents/materials.

d) Monitoring and/or Recordkeeping Requirements

(1) The permitee shall collect and record the following information each month for all inks employed in emissions units K004 & K005 combined:

a. the name and identification number of each ink employed;

b. the OC content of each ink, in lbs OC/lb ink;

c. the VOC content of each coating (excluding water and exempt solvents), in lbs/gallon, as applied [the VOC content shall be calculated in accordance with the equation specified in paragraph (B) (8) of OAC rule 3745-21-10 for CVOC,2;

d. the pounds of each ink employed;

e. the OC emissions, in lbs from each ink, [d)(1)b. x d)(1)d.];

f. the OC emissions, in tons, from all inks, summation [d)(1)e. x 1 ton/2000 lbs];

g. the rolling, 12-month summation of the OC emissions, in tons; and

h. the rolling, 12-month summation of ink usage, in pounds.

(2) The permittee shall collect and record the following information each month for all cleanup materials employed in emissions units K001 through K005, K007, K010, and K011 combined:

a. the name and identification number of each cleanup material employed;

b. the OC content of each cleanup material employed, in lbs/gallon;

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

d. the mass (lbs) of OC applied for each cleanup material employed [d)(2)b. x d)(2)c.];

e. the mass (lbs) of OC applied for all cleanup material employed [summation of d)(2)d.];

f. the rolling, 12-month summation of the OC emissions [calculated by applying a 7% solvent loss rate (0.07) during cleanup operations to the total OC emissions from all cleanup materials employed,d)(2)e. x 0.07 x 1 ton/2000lbs]; and

g. the rolling, 12-month summation of cleanup material usage, in gallons.

(3) The permittee shall collect and record the following information regarding HAP emissions each month for emissions units K001 through K005, K007, K010, and K011 combined:

a. the company identification of each coating, thinner, ink, and cleanup material employed;

b. the pounds per gallon of each HAP in each coating, thinner, ink, and cleanup material,

c. the number of gallons of each coating, thinner, ink, and cleanup material employed;

d. the total emission rate for each HAP from all coatings, thinners, inks, and cleanup materials employed [summation of each HAP emissions rate [d)(3)b. x d)(3)c.] for each individual coating, thinner, and cleanup material*], in lbs/month;

*calculations for HAP emissions from cleanup operations can take into account a solvent loss rate of 7%.

e. the total HAP emission rate for the combination of all HAPs from all coatings, thinners, inks, and cleanup materials employed [summation of d)(3)d. for all HAPs], in lbs/month; and

f. the rolling, 12-month summation of the individual HAPs and all HAPs combined.

(4) The permittee shall certify each month in a written statement that all cleanup operations are in compliance with the operation restriction specified in c)(4).

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. any exceedances of the 10 tons OC/rolling, 12-month period from printing operations for emissions units K004 & K005 combined;

ii. any exceedances of the maximum annual ink usage rate of 100,000 pounds for emissions units K004 & K005 combined, based upon a rolling, 12-month summation of the monthly ink usage rates;

iii. any exceedances of the maximum allowable ink OC content specified in c)(2) of this permit;

iv. any exceedances of the 7.50 tons OC per rolling, 12-month period from cleanup operations for emissions units K001 through K005, K007, K010, and K011 combined;

v. any exceedance of the maximum annual cleanup usage rate of 22,500 gallons for emissions units K001 through K005, K007, K010, and K011 combined, based upon a rolling, 12-month summation of the monthly cleanup usage rates;

vi. any exceedance of the maximum allowable cleanup OC content specified in c)(4) of this permit;

vii. the operational restriction specified in c)(5) requiring reclaim of cleanup solvents and material;

viii. anyexceedance of the rolling individual HAP and combined HAPs emission limitations specified in b)(2)a.iii. of this permit.

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, thepermittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted,electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

(2) The permittee shall notify the Director (the appropriate Ohio EPA District Office) in writing of any monthly record showing the use of noncomplying coatings (coating that exceeds 3.0 lbs of VOC/gallon excluding water and exempt solvents) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office) within 30 days following the end of the calendar month.

(3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

10 tons OC/rolling, 12-month period from printing operations for emissions units K004 & K005 combined.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in d)(1) of this permit.

b. Emission Limitation:

7.50 tons OC/rolling, 12-month period from cleanup operations for emissions units K001 through K005, K007, K010, and K011 combined.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in d)(2) of this permit.

c. Emission Limitations:

9.9 tons per rolling, 12-month period for any individual HAP and 24.9 tons per rolling, 12-month period for any combination of HAPs for emissions units K001 through K005, K007, K010, and K011 combined.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in d)(3) of this permit.

d. Emission Limitation:

The maximum annual ink usage for emissions units K004 & K005 combined shall not exceed 100,000 pounds per year, based on a rolling, 12-month summation of the ink usage.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in d)(1) of this permit.

e. Emission Limitation:

The maximum annual cleanup usage for emissions unit K001 through K005, K007, K010, and K011 combined shall not exceed 22,500 gallons per year, based on a rolling, 12-month summation of the cleanup usage.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in d)(2) of this permit.

f. Emission Limitation:

The OC content for all inks employed in this emissions unit shall not exceed 0.20 lb OC/lb ink.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in d)(1) of this permit.

g. Emission Limitation:

The OC content for all cleanup materials employed in this emissions unit shall not exceed 9.5 lbs OC/gallon.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in d)(2) of this permit.

h. Emission Limitation:

The VOC content of any coating employed in this emissions unit shall not exceed 3.0 lbs/gallon, excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in d)(1) of this permit.

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

g) Miscellaneous Requirements

(1) None.

5. Emissions Unit Group -Roller Coating Operations: K001,K002,K003,

EU ID	Operations, Property and/or Equipment Description
K001	coating line C-1
K002	Coating Line C-2
K003	Coating Lin C-3

a) 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. b)(1)a., b)(2)a., b)(2)b., b)(2)c., c)(1) through c)(5), d)(1) through d)(8), e)(1), and f)(1)a. through f)(1)j.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)	11.97 lbs organic compounds (OC)/hr from coating and thinning operations [See b)(2)a.] 75.78 tons OC/rolling, 12-month period from coating and thinning operations for emissions units K001 through K003, K007 and K011, combined [See b)(2)b., b)(2)c.i. and c)(1)] 7.50 tons OC/rolling, 12-month period from cleanup operations for emissions units K001 through K005, K007, K010 and K011, combined. [See b)(2).c.ii and c)(2) through c)(4)]

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		9.9 tons per roiling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 24.9 tons per rolling, 12-month period for any combination of HAPS for emissions units K001 through K005, K007, K010 and K011, combined [See b)(2)c.iii.]
b.	OAC rule 3745-21-09(B)(6) [in lieu of OAC rule 3745-21-09 (U)(1)]	See b)(2)d.

(2) Additional Terms and Conditions

a. The emissions limitation of 11.97 lbs OC/hr was established to reflect the potential to emit for this emissions unit. Therefore, no record keeping, deviation reporting or compliance method calculations are required to demonstrate compliance with this limitation.

b. Emissions units K001, K002 and K003 shall be equipped with a thermal incinerator that shall achieve not less than ninety percent reduction, by weight, in the overall OC emissions from the coating line and not less than ninety percent, by weight, destruction for the OC emissions vented to the thermal incinerator.

c. The permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Title V and Maximum Achievable Control Technology (MACT) regulations:

i. 75.78 tons OC/rolling, 12-month period from coating and thinning operations for emissions units K001 through K003, K007 and K011, combined, based on coating and thinning content and usage restrictions [see c)(1)]. For purposes of federal enforceability, emission limitations on OC effectively restrict volatile organic compound (VOC) emissions;

ii. 7.50 tons OC/rolling, 12-month period from cleanup operations for emissions units K001 through K005, K007, K010 and K011, combined, [see c)(2), c)(3) and c)(4)]. For purposes of federal enforceability, emission limitations on OC effectively restrict VOC emissions; and

iii. 9.90 tons per rolling, 12-month period for any individual HAP and 24.9 tons per rolling, 12-month period for any combination of HAPs for emissions units K001 through K005, K007, K010 and K011, combined.

d. The emission limitation specified by this rule is less stringent in regards to overall control efficiency than the emission limitation established pursuant to OAC rule 3745-31-05(D).

c) Operational Restrictions

(1) The maximum annual coating and thinner usage for emissions units K001 through K003 K007 and K011, combined, shall not exceed any of the following:

207,000 gallons of coating per rolling, 12-month period with a maximum OC content of 7.0 lbs/gallon; and

7,000 gallons of thinner per rolling, 12-month period with a maximum OC content of 9.5 lbs/gallon.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the coating and thinner usage, upon issuance of this permit.

(2) The maximum annual cleanup material usage for emissions units K001 through K005, K007, K010 and K011 combined shall not exceed 22,500 gallons per rolling, 12-month period.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the cleanup material usage, upon issuance of this permit.

(3) The OC content of any cleanup material employed in this emissions unit shall not exceed 9.5 lbs/gallon.

(4) All solvent and solvent containing material (i.e. rags) shall be reclaimed after cleanup operations have been completed. The solvent and solvent containing material shall be reclaimed by storing in closed containers except during the addition or removal of solvents/materials.

(5) The permittee shall operate the thermal incinerator whenever the emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for all coatings and thinners employed in emissions unit K001 through K003, K007 and K011, combined:

a. the name and identification number of each coating/thinner employed;

b. the OC content, in lbs/gallon, for each coating/thinner;

c. the number of gallons of each coating/thinner employed;

d. the OC emissions, in lbs, from each coating/thinner, [d)(1)b. x d)(1)c.];

e. the OC emissions, in tons, from all coatings/thinners [summation of d)(1)d. x 1 ton/2000 lbs];

f. the rolling, 12-month summation of the OC emissions, in tons; and

g. the rolling, 12-month summation of coating/thinner usage, in gallons.

(2) The permittee shall collect and record the following information each month for all cleanup materials employed in emissions units K001 through K005, K007, K010 and K011, combined.

a. the name and identification number of each cleanup material employed;

b. the OC content of each cleanup material employed, in lbs/gallon;

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

d. the mass (lbs) of OC applied for each cleanup material employed [d)(2)b. x d)(2)c.];

e. the mass (lbs) of OC applied for all cleanup material employed [summation of d)(2)d.];

f. the rolling, 12-month summation of the OC emissions [calculated by applying a 7% solvent loss rate (0.07) during cleanup operations to the total OC emissions from all cleanup materials employed, d)(2)e. x 0.07 x 1 ton/2000lbs]; and

g. the rolling, 12-month summation of cleanup material usage, in gallons.

(3) The permittee shall collect and record the following information regarding HAP emissions each month for emissions units K001 through K005, K007, K010, and K011 combined:

a. the company identification of each coating, thinner, ink, and cleanup material employed;

b. the pounds per gallon of each HAP in each coating, thinner, ink, and cleanup material,

c. the number of gallons of each coating, thinner, ink, and cleanup material employed;

d. the total emission rate for each HAP from all coatings, thinners, inks, and cleanup materials employed [summation of each HAP emissions rate [d)(3)b. x d)(3)c.] for each individual coating, thinner, and cleanup material*], in lbs/month;

e. *calculations for HAP emissions from cleanup operations can take into account a solvent loss rate of 7%.

f. the total HAP emission rate for the combination of all HAPs from all coatings, thinners, inks, and cleanup materials employed [sum of d)(3)d. for all HAPs], in lbs/month; and

g. the rolling, 12-month summation of the individual HAPs and all HAPs combined.

(4) The permittee shall certify each month in a written statement that all cleanup operations are in compliance with the operation restriction specified in c)(4).

(5) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit(s) controlled by the thermal oxidizer is/are in operation, shall not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance.

(6) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal oxidizer when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:

a. all 3-hour blocks of time, when the emissions unit(s) controlled by the thermal oxidizer was/were in operation, during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance; and

b. a log (date and total time) of the downtime or bypass of the capture (collection) system and thermal oxidizer, and/or downtime of the monitoring equipment, when the associated emissions unit(s) was/were in operation.

These records shall be maintained at the facility for a period of three years.

(7) Whenever the monitored average combustion temperature within the thermal oxidizer deviates from the range or limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

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

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that

determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

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

j. the temperature readings immediately after the corrective action was implemented; and

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

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

The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted temperature range/limit based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(s). In addition, approved revisions to the temperature range/limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

(8) The permittee shall maintain daily records that document any time periods when the thermal incinerator was not in service when the emissions unit was in operation.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. 75.78 tons OC per rolling, 12-month period from coating and thinning operations for emissions units K001 through K003, K007, and K011 combined;

ii. the maximum annual coating usage rate of 207,000 gallons for emissions units K001 through K003, K007, and K011 combined, based upon a rolling, 12-month summation of the monthly coating usage rates;

iii. the maximum allowable coating OC content specified in c)(1)a. of this permit.

iv. the maximum annual thinner usage rate of 7,000 gallons for emissions units K001 through K003, K007, and K011 combined, based upon a rolling, 12-month summation of the monthly thinner usage rates;

v. the maximum allowable thinner OC content specified in c)(1)b. of this permit.

vi. the 7.50 tons OC per rolling, 12-month period from cleanup operations for emissions units K001 through K005, K007, K010 and K011 combined;

vii. the maximum annual cleanup usage rate of 22,500 gallons for emissions units K001 through K005, K007, K010 and K011 combined, based upon a rolling, 12-month summation of the monthly cleanup usage rates;

viii. the maximum allowable cleanup OC content specified in c)(3) of this permit;

ix. the operational restriction specified c)(4) requiring reclaim of cleanup solvents and materials;

x. the rolling individual HAP and combined HAPs emission limitations specified in b)(2)c.iii. of this permit;

xi. each period of time (start time and date, and end time and date)when the average combustion temperature within the thermal oxidizer was outside of the acceptable range;

xii. any period of time (start time and date, and end time and date)when the emissions unit(s) was/were in operation and the process emissions were not vented to the thermal oxidizer;

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, thepermittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted,electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

11.97 lbs OC/hr from coating and thinning operations

Applicable Compliance Method:

The hourly emission limitation represents the potential to emit* of the emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*The potential to emit was developed by summing the following:

the maximum hourly coating usage (15.75 gal/hr) x the maximum coating OC content (7.0 lbs/gallon coating) x 90% overall control + the maximum hourly thinner usage (0.98 gal/hr) x the maximum thinner OC content (9.5 lbs/gallon) x 90% overall control.

b. Emission Limitation:

75.78 tons OC/rolling, 12-month period from coating and thinning operations for emissions units K001 through K003, K007 and K011, combined.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in d)(1) of this permit.

c. Emission Limitation:

7.50 tons OC/rolling, 12-month period from cleanup operations for emissions units K001 through K005, K007, K010, and K011, combined.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in d)(2) of this permit.

d. Emission Limitations:

9.9 tons per rolling, 12-month period for any individual HAP and 24.9 tons per rolling, 12-month period for any combination of HAPs for emissions units K001 through K005, K007, K010 and K011, combined.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in d)(3) of this permit.

e. Emission Limitation:

The maximum annual coating usage for emissions units K001 through K003, K007 and K011, combined, shall not exceed 207,000 gallons per year, based on a rolling, 12-month summation of the coating usage.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in d)(1) of this permit.

f. Emission Limitation:

The maximum annual thinner usage for emissions units K001 through K003, K007 and K011 combined, shall not exceed 7,000 gallons per year, based on a rolling, 12-month summation of the thinner usage.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in d)(1) of this permit.

g. Emission Limitation:

The maximum annual cleanup usage for emissions unit K001 through K005, K007, K010, and K011, combined, shall not exceed 22,500 gallons per year, based on a rolling, 12-month summation of the cleanup usage.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in d)(2) of this permit.

h. Emission Limitation:

The OC content for all coatings employed in this emissions unit shall not exceed 7.0 lbs/gallon.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in d)(1) of this permit.

i. Emission Limitation:

The OC content for all thinners employed in this emissions unit shall not exceed 9.5 lbs/gallon.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in d)(1) of this permit.

j. Emission Limitation:

The OC content for all cleanup materials employed in this emissions unit shall not exceed 9.5 lbs OC/gallon.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in d)(2) of this permit.

g) Miscellaneous Requirements

(1) None.