

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

6/25/2014

Certified Mail

Mr. Joshua Jones
CCL Label, Inc. - Industrial Products Div
17700 Foltz Parkway
Strongsville, OH 44149

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

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1318558062
Permit Number: P0116057
Permit Type: Initial Installation
County: Cuyahoga

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 Cleveland Division of Air Quality at (216)664-2297 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



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

Cc: CDAQ



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
CCL Label, Inc. - Industrial Products Div**

Facility ID:	1318558062
Permit Number:	P0116057
Permit Type:	Initial Installation
Issued:	6/25/2014
Effective:	6/25/2014
Expiration:	3/6/2018



Division of Air Pollution Control
Permit-to-Install and Operate
for
CCL Label, Inc. - Industrial Products Div

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Final Permit-to-Install and Operate
CCL Label, Inc. - Industrial Products Div
Permit Number: P0116057
Facility ID: 1318558062
Effective Date: 6/25/2014

Authorization

Facility ID: 1318558062
Application Number(s): A0049643, A0049879
Permit Number: P0116057
Permit Description: Initial installation of two flexographic printing presses (K018 and K019).
Permit Type: Initial Installation
Permit Fee: \$800.00
Issue Date: 6/25/2014
Effective Date: 6/25/2014
Expiration Date: 3/6/2018
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

CCL Label, Inc. - Industrial Products Div
17700 Foltz Parkway
Strongsville, OH 44149

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

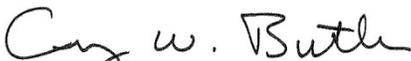
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Cleveland Division of Air Quality
2nd Floor
75 Erieview Plaza
Cleveland, OH 44114
(216)664-2297

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: P0116057

Permit Description: Initial installation of two flexographic printing presses (K018 and K019).

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

Group Name: Gallus Flexographic Printing

Emissions Unit ID:	K018
Company Equipment ID:	Gallus Press 1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K019
Company Equipment ID:	Gallus Press 2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



Final Permit-to-Install and Operate
CCL Label, Inc. - Industrial Products Div
Permit Number: P0116057
Facility ID: 1318558062
Effective Date: 6/25/2014

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 being permanently shut down without first applying for and obtaining a permit pursuant to 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.



Final Permit-to-Install and Operate
CCL Label, Inc. - Industrial Products Div
Permit Number: P0116057
Facility ID: 1318558062
Effective Date: 6/25/2014

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) c)(1), c)(2)
 - c) Applicable Emission 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. 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)(1) FEPTIO to avoid Title V	Volatile Organic Compound (VOC) emissions from the facility shall not exceed 99.5 tons per year. See b)(2)a. and b)(2)b. below.

- (2) Additional Terms and Conditions
 - a. The emission of Hazardous Air Pollutants (HAPs) from this facility shall not exceed 9.9 tons for any single HAP and 24.9 tons from any combination of HAPs, per rolling 12-month period.
 - b. The facility-wide VOC and HAP emission limitations shall include the following emissions units: K001, K004, K005, K007, K008, K009, K010, K011, K018, K019, K202, K204, K205, K206, K207, K208, P002, P003, and P008.
- d) Operational Restrictions
 - (1) The maximum annual VOC material usage for all of the emissions units listed in c)(2)b. shall not exceed 99.5 tons, per rolling 12-month period, based on a summation of the volatile organic material usage figures.



e) Monitoring and Recordkeeping Requirements

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

- a. the name and identification of each ink, coating, additive, adhesive, and cleanup material employed;
- b. the weight (lbs/month) of each ink, coating, additive, adhesive, and cleanup material employed, as applied;
- c. the VOC content of each ink, coating, additive, adhesive, and cleanup material as applied, in percent by weight;
- d. the total volatile material usage from all inks, coatings, additives, adhesives, and cleanup materials calculated by summing the records of [(1)b. x (1)c.] for each ink, coating, additive, adhesive, and cleanup material employed (lbs/month);
- e. the total VOC emissions generated from all inks, coatings, additives, adhesives, and cleanup materials employed, calculated by summing the records of [(1)b. x (1)c.] for each material and subtracting any recovered material (lbs/month);

If a credit for recovered materials is to be used to demonstrate compliance, and/or used in calculations for emission reports, records of the total amount (gallons or pounds) of the materials collected and added to the recovery tank/drum shall be maintained as required in e)(2) below.

- f. the summation of VOC material usage over a rolling, 12-month period and VOC emissions from all inks, coatings, additives, adhesives, and cleanup materials, as applied, in tons;
- g. the individual and combined HAP content for each ink, coating, additive, adhesive, and cleanup materials, as applied, in percent by weight;
- h. the total individual and combined HAP emissions generated from all inks, coatings, additives, and cleanup materials employed, calculated by summing the records of [(1)b. x (1)g.] for each material (lbs/month);
- i. the summation of each individual and combined HAP material usage and emission rate from all inks, coatings, additives, adhesives, and cleanup materials employed, in tons, over a rolling 12-month period; and
- j. the summation of all coating and ink materials employed, in pounds or tons, over a rolling 12-month period.

(2) If a credit for recovered materials is to be used to demonstrate compliance and/or used in calculations for emission reports, the permittee shall maintain the following records for the recovered materials and the recovery tank or drum serving the emissions units:

- a. the date the materials from the recovery drum or tank were shipped off site;



- b. the amount of recovered material (gallons or pounds) from the recovery drum or tank shipped off site;
- c. the average density of the recovered material (pounds/gallon) from the recovery drum or tank (if the amount is recorded in gallons);
- d. the average VOC content for the recovered material, in percent by weight; and
- e. the average VOC emissions from the recovered materials [(2)b. x (2)d.], in pounds. Note the average VOC emissions, in pounds, from the recovered materials is calculated as [(2)b. x (2)c. x (2)d.] if the material amount is recorded in gallons.

f) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion reports) that identify the following information:
 - 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, recordkeeping, and/or testing requirements in this permit:
 - i. identification of each month during which the individual HAP material usage and emissions exceeded 9.9 tons over the rolling 12-month period;
 - ii. identification of each month during which the combined HAP material usage and emissions exceeded 24.9 tons over the rolling 12-month period; and
 - iii. identification of each month in which the VOC material usage and emissions exceed 99.5 tons over the rolling 12-month period.
 - 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 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 or the appropriate District Office of local air agency.



- (2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- g) Testing Requirements:
- (1) Compliance with the emission limitation(s) in c) of these terms and conditions shall be determined in accordance with the following method(s):
- a. Emission Limitation:
- VOC emissions shall not exceed 99.5 tons per rolling, 12-month period for this facility.
- Applicable Compliance Method:
- Compliance shall be determined based on the recordkeeping requirements specified in e)(1).
- b. Emission Limitation:
- Individual HAP emissions shall not exceed 9.9 tons per rolling, 12-month period for this facility.
- Applicable Compliance Method:
- Compliance shall be determined based on the recordkeeping requirements specified in e)(1).
- c. Emission Limitation:
- Combined HAP emissions shall not exceed 24.9 tons per rolling, 12-month period for this facility.
- Applicable Compliance Method:
- Compliance shall be determined based on the recordkeeping requirements specified in e)(1).



Final Permit-to-Install and Operate
CCL Label, Inc. - Industrial Products Div
Permit Number: P0116057
Facility ID: 1318558062
Effective Date: 6/25/2014

C. Emissions Unit Terms and Conditions



1. Emissions Unit Group -Gallus Flexographic Printing: K018,K019,

EU ID	Operations, Property and/or Equipment Description
K018	Gallus Flexographic Printing Press (Model # EM410), nine electric and nine UV associated drying ovens.
K019	Gallus Flexographic Printing Press (Model # EM410), nine electric and nine UV associated drying ovens.

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) 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), as effective 11/30/2001.	Volatile organic compound (VOC) emissions shall not exceed 0.375 ton per month, averaged over a rolling, 12-month period for each emissions unit. The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(Y)(2) and 3745-31-05(D). See b)(2)a. below.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/1/2006.	See b)(2)b. below.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-31-05(D) FEPTIO to avoid Title V	See Section B.
d.	OAC rule 3745-31-05(F)	See c)(1) below.
e.	OAC rule 3745-21-09(Y)(2)(b) and (Y)(3)	See b)(2)c. below.
f.	40 CFR Part 60, Subpart RR	See b)(2)d. below.

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulation for NAAQS pollutant emissions less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revision to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, these emission limits/control measures no longer apply.
- b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirement under OAC rule 3745-31-05(A)(3) does not apply to the emissions from these air contaminant sources since the calculated annual emission rates for VOC are less than ten tons per year.
- c. The requirements of paragraph (Y)(1) of this rule shall not apply to any printing line which is located at a facility in which the total maximum usage of coatings and inks in all flexographic, packaging rotogravure, and publication rotogravure printing lines, is less than or equal to 148 tons per year; except as otherwise provided under paragraph (Y)(3) of this rule.

Once the requirements of paragraph (Y)(1) of this rule apply to a facility or a flexographic, packaging rotogravure and publication rotogravure printing line within the facility, the facility is not eligible for an exemption under paragraphs (Y)(2)(b) and (Y)(2)(d) of this rule.



- d. Emissions units K018 and K019 are exempt from the requirements of 40 CFR Part 60, Subpart RR, "Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations", and the emission limitations described in 40 CFR 60.442(a) because the VOC input for each emissions unit is less than 45 Mg (50 tons) per 12-month period. If the amount of VOC exceeds 45 Mg per 12-month period, the emissions units will no longer be exempt from 40 CFR Part 60, Subpart RR.
- (3) During development of this permit, the permittee identified plans to implement a material usage system within the next six (6) months that will allow for the tracking of material on a per press basis as specified under d)(1) below. Within six (6) months of the issuance of this permit, the permittee shall implement a material usage tracking system that shall enable tracking material usage as described in d)(1) and f)(1)a. below on a per press basis. Until that system has been implemented, the permittee shall comply with the monitoring and recordkeeping requirements as specified in d)(2) and f)(1)b. below.
 - (4) The permittee shall notify the Cleveland Division of Air Quality (Cleveland DAQ) in writing, within fifteen (15) days of the implementation material usage tracking system that shall enable tracking material usage as described in d)(1).
- c) **Operational Restrictions**
 - (1) The maximum annual operating hours for each emissions unit, shall not exceed 2,625 hours, based on a rolling 12-month summation of the operating hours.
 - (2) The maximum annual ink and coating usage in all flexographic, packaging rotogravure, and publication rotogravure printing lines located within the facility shall not exceed a combined total of 148 tons per year.
- d) **Monitoring and/or Recordkeeping Requirements**
 - (1) The permittee shall collect and record the following information for each printing press identified above on a monthly basis:
 - a. the name and identification number of each ink, coating, additive, adhesive, and cleanup material employed;
 - b. the weight in pounds or tons per month of each ink, coating, additive, adhesive, and cleanup material employed, as applied;
 - c. the VOC content of each ink, coating, additive, adhesive, and cleanup material employed, in percent by weight;
 - d. the total VOC-containing material usage and VOC emissions from all inks, coatings, additives, adhesives, and cleanup materials employed, calculated by summing the records of [(1.b) x (1.c)] for each ink, coating, additive, adhesive, and cleanup material, and subtracting any recovered material (see d)(3) below) in pounds or tons per month;



- e. the summation of VOC material usage over a rolling 12-month period and VOC emissions from all inks, coatings, additives, adhesives, and cleanup materials, as applied, in pounds or tons; and
 - f. the summation of all inks, coatings, additives, adhesives, and cleanup materials employed over a rolling 12-month period, in pounds or tons.
- (2) The permittee shall collect and record the following information for each emissions unit on a monthly basis:
- a. the actual monthly press hours of operation, in hours per month;
 - b. a summation of the operational press hours over a rolling 12-month period.
- (3) If a credit for recovered materials is to be used to demonstrate compliance and/or used in calculations for emission reports, the permittee shall maintain the following records for the recovered materials and the recovery drum or tank serving this emissions unit:
- a. the date the materials from the recovery drum or tank were shipped off site;
 - b. the amount of recovered material (in gallons or pounds) from the recovery drum or tank shipped off site;
 - c. the average density of the recovered material (in pounds or gallons) from the recovery drum or tank (if the amount is recorded in gallons);
 - d. the average VOC content for the recovered materials, in percent by weight; and
 - e. the average VOC emissions from the recovered materials [(3)b. x (3)d.], in pounds. Note the average VOC emissions, in pounds, from the recovered material is calculated as [(3)b. x (3)c. x (3)d.] if the material amount is recorded in gallons.
- e) Reporting Requirements
- (1) The permittee shall notify the Cleveland Division of Air Quality (Cleveland DAQ) in writing of any monthly record showing that the summation of ink and coating usage in all flexographic, packaging rotogravure, and publication rotogravure printing lines exceeded 148 tons over a 12-month period. The notification shall include a copy of such record and shall be sent to the Cleveland DAQ within 30 days following the end of the calendar month during which the exceedances were identified.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services 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 12-months for each air contaminant source identified in this permit.
- (3) The permittee shall identify the following information in the annual PER in accordance with the operational restriction in c)(1) above:



- a. exceedance of the operational restriction of 2,625 operating hours for each emissions unit, based upon a rolling, 12-month summation of the press operating hours.

f) Testing Requirements

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

- a. Emissions Limitation:

VOC emissions shall not exceed 0.375 ton per month, averaged over a rolling, 12-month period for each emissions unit.

Applicable Compliance Method:

Compliance with the ton per month, averaged over a rolling, 12-month period emission limitation shall be demonstrated based upon the recordkeeping requirements located under d)(1).

- b. Emissions Limitation:

VOC emissions shall not exceed 0.375 ton per month, for each emissions unit.

Applicable Compliance Method:

Compliance with the ton per month emission limitation shall be demonstrated based on the following calculations from the information presented in the permittee's application and upon the recordkeeping requirements located under d)(2):

$$E = A * B * C$$

Where:

E = tons VOC emissions per month

A = actual press hours per month

B = 3.43 lbs VOC/hour

C = 1 ton/2,000 pounds

The following information was taken from CCL's 2012 fee emissions report (FER) for development of the VOC emissions limitations and compliance calculation (above):

- (a) Average facility-wide press hours - 1,750 hours/year
- (b) Safety factor of a 50% increase in press hours;



(c) 1,750 press hours x 50% increase = 2,625 press hours per year.

Average emission rate for all inks and coatings used onsite was determined to be 3.43 lbs VOC/hour.

This compliance method shall be used for the first six months after the issuance date of this permit. After the material usage tracking system has been implemented, compliance shall be determined according to f)(1)a. above.

g) Miscellaneous Requirements

(1) None.