State of Ohio Environmental Protection Agency

Street Address: Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329

Mailing Address: Lazarus Gov. Center

RE: DRAFT PERMIT TO INSTALL MODIFICATION **CERTIFIED MAIL**
CUYAHOGA COUNTY
Application No: 13-04402
Fac ID: 1318532181
DATE: 9/26/2006

Smurfit Stone Inc
Kevin Rooth
6385 Cochran Rd
Solon, OH 441393961

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install modification for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit modification. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit modification should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install modification may be issued in proposed of final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install modification a fee of **$ 100** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: **USEPA** **CLAA** **PA**

CUYAHOGA COUNTY

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL **13-04402** FOR AN AIR CONTAMINANT SOURCE FOR
Smurfit Stone Inc

On 9/26/2006 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Smurfit Stone Inc**, located at **6385 Cochran Rd, Solon**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 13-04402:

Administrative modification to include emissions from fountain solution that were previously overlooked.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

David Hearne, Cleveland City Health Department, Division of the Environment, 1925 St. Clair Avenue, Cleveland, OH 44114 [(216)664-2324]

DRAFT MODIFICATION OF PERMIT TO INSTALL 13-04402

Application Number:	13-04402
Facility ID:	1318532181
Permit Fee:	**To be entered upon final issuance**
Name of Facility:	Smurfit Stone Inc
Person to Contact:	Kevin Rooth
Address:	6385 Cochran Rd solon, OH 441393961

Location of proposed air contaminant source(s) [emissions unit(s)]:
6385 Cochran Rd
Solon, **Ohio**

Description of proposed emissions unit(s):
Administrative modification to include emissions from fountain solution that were previously overlooked.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described source(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

_____
Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections,

conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

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

7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

10. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available

Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons Per Year
VOC	9.1 (K012 only)
single HAP	9.9 (total facility)
combined HAPs	24.9 (total facility)
total facility VOC	97.1 (total facility)

Emissions Unit ID: **K012**

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	OAC rule 3745-31-05(C) Synthetic Minor to avoid Title V and MACT
K012 - Komori Chambon eight color web offset Lithographic (non-heatset) press with two auxiliary printing units functioning as either gravure or flexography.	OAC rule 3745-31-05(A)(3)	OAC rule 3745-21-09(Y)(2)(b)
MODIFIED **The terms in this permit supercede those identified in PTI 13-04402 issued on 11/30/2004.**		

OAC rule 3745-21-07(G)

Issued: To be entered upon final issuance

Applicable Emissions Limitations/Control Measures	
30.2 lbs VOC/hr from inks/ coatings/ fountain solutions Volatile organic compound (VOC) emissions from this emissions unit shall not exceed 9.1 tpy, as a rolling 12-month summation, from a combination of inks, coatings, fountain solutions and clean-up materials. The VOC content of the coatings and inks employed in this emissions unit shall not exceed 0.4 pound VOC per gallon, as applied, as a monthly, volume-weighted average. The VOC content of the fountain solutions employed in this emissions unit shall not exceed 0.83 pound VOC per gallon, as applied, as a monthly, volume-weighted average. The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G), 3745-31-05(C) and 3745-21-09(Y). See section A.2.a Volatile organic compound	(VOC) emissions from the facility shall not exceed 97.1 tons per rolling 12-month period. See section A.2.b. See section A.2.d

Issued: To be entered upon final issuance

2. Additional Terms and Conditions

2.a The permittee shall not employ any photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit. This rule applies when this emissions unit functions as an offset Lithographic (non-heatset) press.

2.b The total allowable emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 tons/year for any single HAP and 24.9 tons/year for any combination of HAPs, based on a rolling, 12-month summation of emissions.

The permittee has existing records to demonstrate compliance with this limit upon permit issuance.

2.c The facility-wide emission limits shall include emissions from the following units: K002, K003, K008, K009, K010, K011, K012, P001, P002, B002 and exempt steam generators, and five De Minimis gluers.

2.d The total maximum usage of coatings and inks in all flexographic, packaging rotogravure and publication rotogravure printing lines shall be less than or equal to 148 tons per year. This limitation applies to the amount of coating usage when this emissions unit operates as a flexographic press.

2.e The pound per hour VOC emission limitation is based on the emissions unit's potential to emit. Therefore, monitoring , recordkeeping and reporting are not required to demonstrate compliance with this limit.

B. Operational Restrictions

1. The maximum annual volatile organic material usage for this emissions unit shall not exceed 207,200 lbs, based upon a rolling 12-month summation of the volatile organic material usage figures.

To ensure enforceability during the first twelve calendar months of operation following the issuance of this permit, the permittee shall not exceed the usage rates specified in the following table:

Month(s)	Maximum Allowable Cumulative Volatile Organic Material Usage (lbs)

1	17,266
1-2	34,532
1-3	51,798
1-4	69,064
1-5	86,330
1-6	103,596
1-7	120,862
1-8	138,128
1-9	155,394
1-10	172,660
1-11	189,926
1-12	207,200

After the first twelve calendar months of operation following the issuance of this permit, compliance with the annual emissions limitation shall be based upon a rolling, 12-month summation of the monthly volatile organic material usage figures.

2. The maximum annual VOC emissions for the facility (See A.2.c) shall not exceed 97.1 tons, based upon a rolling 12-month summation of the monthly VOC emissions.

   To ensure enforceability during the first twelve calendar months of operation following the issuance of this permit, the actual VOC emissions over the previous 12 calendar months shall be used to determine the rolling, 12-month VOC emissions for the facility.

3. The maximum annual HAP material usage for the facility (See A.2.c) shall be restricted and monitored so that HAP emissions shall not exceed 9.9 tons for any single HAP and 24.9 tons for combined HAPs, based upon a rolling 12-month summation of the emissions.

   To ensure enforceability during the first twelve calendar months of operation following the issuance of this permit, the actual individual and combined HAPs material usage records over the previous 12 calendar months of operation shall be used to determine the rolling, 12-month HAPs emissions for the facility.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the coating lines at this facility:

   a. the name and identification number of each ink, fountain solution and coating, employed;

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

c. the individual hazardous air pollutant (*HAP) content for each HAP of each ink, fountain solution and coating in pounds of individual HAP per gallon of coating, as applied;

d. the total combined HAP content of each coating in pounds of combined HAPs per gallon of ink, fountain solution and coating, as applied [sum all the individual HAP contents from (c)];

e. the amount, in gallons, of each ink, fountain solution and coating employed;

f. the name and identification of each cleanup material employed;

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

h. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;

i. the total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied [sum all the individual HAP contents from (h)];

j. the amount, in gallons, of each cleanup material employed;

k. the total VOC emissions from all ink, coatings, fountain solutions and cleanup materials employed calculated by summing the records of [(b) x (e) x (100% - solvent retention factor**) for each ink/coating /fountain solution, plus (g) x (j) for each cleanup material], in pounds and tons per month;

l. the total volatile organic material usage for all ink, coatings, fountain solutions and cleanup materials employed calculated by summing the records of [(b) x (e) plus (g) x (j)] for each ink, coating, fountain solution and cleanup material, in pounds and tons per month;

m. the updated rolling, 12-month summation of volatile organic material usage and VOC emissions from all ink, coatings, fountain solutions and cleanup materials employed, in tons (this shall include the information for the current month and the preceding eleven calendar months);

n. the total individual HAP emissions for each HAP from all inks, coatings, fountain solutions and cleanup materials employed, in pounds or tons per month [for each HAP the sum of (c) x (e) x (100%- solvent retention factor**) for each ink/coating/fountain solution, plus the sum of (h) x (j) for each cleanup material];

o. the total combined HAP emissions from all inks, coatings, fountain solutions and cleanup materials employed, in pounds or tons per month [the sum of (d) x (e) x (100%- solvent retention factor**) for each ink/coating/fountain solution plus the sum of (i) x (j) for each cleanup material];

p. the updated rolling, 12-month summation of emissions for each individual HAP, in pounds or tons (this shall include the information for the current month and the preceding eleven calendar months); and

q. the updated rolling, 12-month summation of emissions for total combined HAP, in pounds or tons (this shall include the information for the current month and the preceding eleven calendar months).

* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Local Air Agency contact. This information does not have to be kept on an individual emissions unit basis.

**The solvent retention factor for lithographic inks is 95% per USEPA's CTG document "Control of VOC emissions from Offset Lithographic Printing" , and the solvent retention factor for flexographic inks is 7% based on the permittee's previous mass balance determinations. The solvent retention factor for the fountain solutions is 0% based on the permittee's previous mass balance determinations.

2. The permittee shall collect and record the following information for each month for this emissions unit:

a. the name and identification of each ink, coating, fountain solution and cleanup material employed;

b. the amount, in gallons, of each ink, fountain solution and coating employed (this record shall be kept separate for lithographic inks and flexographic inks);

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

d. the amount, in gallons, of each cleanup material employed;

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

Issued: To be entered upon final issuance

f. the VOC contents of the coatings, fountain solutions and inks, as applied based on a monthly volume-weighted average [the sum of (b) x (c) for all inks, fountain solutions and coatings employed divided by the total volume of all the coatings, fountain solutions and inks for the month] per OAC rule 3745-21-10(B).

g. the total VOC emissions for all inks/coatings/fountain solutions and cleanup materials, in pounds [sum of (b) x (c) x (100% - solvent retention factor*) for each ink/coating/fountain solution, plus (d) x (e)] for each cleanup material, in pounds and tons;

h. the total volatile organic material usage for all inks/coatings/fountain solutions and cleanup materials, in pounds [sum of (b) x (c) plus (d) x (e)], in pounds and tons;

i. the updated rolling, 12-month summation of the volatile organic material usage and VOC emissions for all inks/coatings/fountain solutions and cleanup materials, in tons (this shall include the information for the current month and the preceding eleven calendar months).

*The solvent retention factor for lithographic inks is 95% per USEPA's CTG document "Control of VOC emissions from Offset Lithographic Printing" , and the solvent retention factor for flexographic inks is 7% based on the permittee's previous mass balance determinations. The solvent retention factor for the fountain solutions is 0% based on the permittee's previous mass balance determinations.

3. The permittee shall record the total VOC emission rate for this emissions unit from all coatings, inks, fountain solutions and cleanup materials for each calendar year, in tons.

4. The permit to install for K012 was evaluated based on the actual materials (typically inks, 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 Toxics 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: Ammonia
TLV (ug/m3): 17,413
Maximum Average Hourly Emission Rate (lbs/hr): 4.35
Predicted 1-Hour Maximum Ground-Level Concentration at 112 m (ug/m3): 292
MAGLC (ug/m3): 415

Pollutant: Isopropyl alcohol
TLV (ug/m3): 491,534

Emissions Unit ID: **K012**

Maximum Average Hourly Emission Rate (lbs/hr): 9.94
Predicted 1-Hour Maximum Ground-Level Concentration at 112 m (ug/m3): 667
MAGLC (ug/m3): 11,703

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 Toxics 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 Toxics Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxics Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxics 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.).

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.

5. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the emissions unit, if changed as outlined above, will still satisfy the "Air Toxics 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 Toxics 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 Toxics Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Cleveland Division of Air Quality (Cleveland DAQ) in writing of any monthly record showing the use of noncomplying coatings, fountain solutions and/or inks (i.e., the VOC content limitation in term A.1). The notification shall include a copy of such records and shall be sent to the Cleveland DAQ within 30 days after the exceedance occurs.

   The deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.ii.

2. The permittee shall submit annual reports that include the total VOC emissions, in tons for this emissions unit. These reports shall be submitted by April 15 of each year and shall cover the previous calendar year.

3. The permittee shall submit deviation (excursion) reports which include the following information for the facility (see A.2.c) :

   a. an identification of each month during which the rolling, 12-month individual HAP emissions exceed 9.9 tons/yr based on a rolling, 12-month summation;

   b. an identification of each month during which the rolling, 12-month combined HAP emissions exceed 24.9 tons/yr based on a rolling, 12-month summation;

   c. an identification of each month during which the rolling, 12-month VOC emissions exceed 97.1 tons/yr based on a rolling, 12-month summation;

   The deviation (excursion) report shall be sent to the Cleveland DAQ within 30 days following the end of the calendar month during which they were identified and shall include a copy of any such record; an identification of the probable cause for such deviation; and any corrective actions or preventative measures which have been, or will be taken, to correct the situation.

4. The permittee shall submit deviation (excursion) reports which identify any exceedance of the rolling, 12-month material usage limitation for the emissions unit.

   The deviation (excursion) report shall be sent to the Cleveland DAQ within 30 days following the end of the calendar month during which they were identified and shall include a copy of any such record; an identification of the probable cause for such deviation; and any corrective actions or preventative measures which have been, or will be taken, to correct the situation.

E. Testing Requirements

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

a. Emission Limitation:

VOC content of the coatings and inks employed in this emissions unit shall not exceed 0.4 pound VOC per gallon, as applied as a monthly, volume-weighted average.

Applicable Compliance Method:
USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) or formulation data shall be used to determine the organic compound and volatile organic compound contents of the coatings and inks.
Compliance with the monthly, volume-weighted average VOC content limitation shall be based on the recordkeeping requirements established in Section C.2.

b. Emission Limitation:

9.1 tons/year of VOC emissions from inks/coatings/ fountain solutions and cleanup material, as a rolling, 12-month summation

Applicable Compliance Method:
Compliance shall be determined by the record keeping in Section C.2.

c. Emission Limitation:

30.2 pounds/hour of VOC emissions from inks/coatings/ fountain solutions

Applicable Compliance Method:
The hourly VOC emission rate for inks/coatings/fountain solutions is based on the sum of the emissions unit's potential to emit. Therefore, monitoring , recordkeeping and reporting are not required to demonstrate compliance with this limit. The potential to emit was calculated by multiplying the maximum hourly square foot production rate by the maximum coating/ink/ fountain solution rate per square foot divided by the minimum density of the inks/coatings/fountain solutions and multiplying by the allowable VOC content of the coatings/inks/ fountain solutions.

0.276 million square feet/hour by 900 lbs coating/million square feet divided by 8.70 lbs/gal coating multiplied by 0.40 lbs/gal VOC content for the coatings.

0.276 million square feet/hour by 250 lbs ink/million square feet divided by 9.18 lbs/gal ink multiplied by 0.40 lbs/gal VOC content for the ink.

0.276 million square feet/hour by 610 lbs fountain solution/million square feet divided by 8.85 lbs/gal fountain solution multiplied by 0.83 lbs/gal VOC content for the fountain solution.

d. Emission Limitation:
97.1 tons VOC per rolling, 12-month period for this facility

Applicable Compliance Method:
Compliance shall be determined based on the recordkeeping specified in Section C.

e. Emission Limitation:
9.9 tons individual HAP emissions per rolling, 12-month period for this facility

Applicable Compliance Method:
Compliance shall be determined based on the recordkeeping specified in Section C.

f. Emission Limitation:
24.9 tons combined HAP emissions per rolling, 12-month period for this facility

Applicable Compliance Method:
Compliance shall be determined based on the recordkeeping specified in Section C.

g. Emission Limitation:
The VOC content of the fountain solution employed in this emissions unit shall not exceed 0.83 pound VOC per gallon, as applied, as a monthly, volume-weighted average.

Applicable Compliance Method:
USEPA Method 24 or 24A or formulation data shall be used to determine the volatile organic compound contents of the fountain solution.

2. Formulation data shall be used to determine the VOC contents of the cleanup materials.

Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A., B.1 - B.3, C.1 - C.2, D.1 - D.3, and E.1 - E.2.