☒ **Synthetic Minor Determination and/or** ☐ **Netting Determination**
Permit To Install **# 13-04073**

A. Source Description

Avery Dennison Corp. - Industrial Products Division is a commercial printing operation located in Strongsville Ohio. The facility currently includes 15 existing print lines and numerous other emissions units and they propose to transfer a printing line from their Cleveland facility to this facility (the Strongsville facility had 17 printing lines permitted according to various existing PTI's; however, they submitted a letter requesting the withdrawal of 2 existing print lines with this new PTI application. The withdrawn units include K012 {to be moved to Cleveland} and K017 {to be dismantled}.). In addition to the aforementioned withdrawn units, Avery proposes to move a continuous narrow web printing line from their Cleveland Facility (Facility # 13-18-00-1435; Mark Andy Press #664, P008 per Cleveland PTI #13-03231) to this Strongsville facility due to operational needs. The facility is requesting synthetic minor restrictions for this new unit by limiting material usage, verified through a 12-month summation calculation, to maintain compliance. Of note, many of the ink reservoirs feed more than one print line so this creates a difficulty in calculating emissions from, and demonstrating compliance of, the individual emissions units. The potential and actual emissions for the individual emissions units have been calculated through engineering calculations, knowledge of sources/industry sector, using AP-42 emissions factors, and by following the Printing Industry of Ohio guidance document titled "A Self Help Guide to Environmentally Sound Printing Operations".

B. Facility Emissions and Attainment Status

Avery Dennison Corp. - Automotive Products Division falls into the Title V major source category based on the facility potential emissions (greater than 100 tpy VOC emissions); however, the synthetic minor restrictions outlined in this permit, as well as limits outlined in other existing permits, would limit the facility emissions below the Title V threshold. In addition, the facility is removing 2 existing print lines while adding this new line so an overall decrease exists for the actual facility emissions. Cuyahoga County is designated as attainment for ozone (1-hr average).

C. Source Emissions

The facility sources have a combined potential to emit (PTE) of more than 100 tpy VOC (approximately 500 tpy) resulting in the Title V applicability. The permittee has chosen to restrict the facility-wide VOC emissions (98 tpy VOC) and HAP emissions (9.9 tpy any single HAP and 24.9 tpy for all combined HAPs) from these sources below the 100 tpy Title V threshold through a synthetic minor permit. They propose to meet these requirements by self-regulating the volatile organic material usage, utilizing low VOC content materials where they are available, and verifying the facility emissions through recording keeping and a 12-month summation calculation. As part of this strategy, the emissions from this individual source (K028) would be restricted to 11.30 tpy VOC emissions.

D. Conclusion

Avery Dennison has chosen to limit the production capabilities of this facility through the use of a synthetic minor permit. The limits they propose for this individual source include 11.30 tpy VOC emissions with a short term limit of 12.58 lbs/hr. The facility-wide restrictions will include 98 tpy VOC

emissions, 9.9 tpy

single HAP emissions, and 24.9 tpy combined HAP emissions. Avery plans to demonstrate compliance with these emission limits by calculating the facility wide emissions using a 12-month summation derived from material usage. The Cleveland Local Air Agency (CLAA) recommends approval of this permit because a review of the historical facility material usage data (summary from May 2001 to May 2003) verifies that the actual facility emissions are significantly lower than the theoretical potential emissions. In addition, two
previous permitting actions, as agreed upon by the Ohio EPA, have already set a precedence for similar approaches: a) Avery Dennison (located in Strongsville, Ohio) through the July 2002 issuance of PTI # 13-03807; and b) the Weyerhaeuser Company (located in Valley View, Ohio) through the recent issuance of PTI # 13-04014.

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 **CERTIFIED MAIL**
CUYAHOGA COUNTY
Application No: 13-04073
DATE: 11/25/2003

Avery Dennison Industrial Products Div
Mike Kalbaugh
17700 Foltz Industrial Parkway
Strongsville, OH 44149

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. 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 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 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 a fee of **$200** 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.

Very truly yours,

Michael W. Ahern

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

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

CUYAHOGA COUNTY

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL **13-04073** FOR AN AIR CONTAMINANT SOURCE FOR
AVERY DENNISON INDUSTRIAL PRODUCTS DIV

On 11/25/2003 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Avery Dennison Industrial Products Div**, located at **17700 Foltz Industrial Parkway, Strongsville**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 13-04073:

Installation of new Mark Andy press no. 664 -- K028.

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 PERMIT TO INSTALL 13-04073

Application Number:	13-04073
APS Premise Number:	1318558062
Permit Fee:	**To be entered upon final issuance**
Name of Facility:	Avery Dennison Industrial Products Div
Person to Contact:	Mike Kalbaugh
Address:	17700 Foltz Industrial Parkway Strongsville, OH 44149

Location of proposed air contaminant source(s) [emissions unit(s)]:
17700 Foltz Industrial Parkway
Strongsville, **Ohio**

Description of proposed emissions unit(s):
Installation of new Mark Andy press no. 664 -- K028.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described emissions unit(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 and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

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

a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete

Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. 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 source(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.

Pollutant	Tons Per Year
VOC	11.30

Emissions Unit ID: K028

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	Applicable Emissions Limitations/Control Measures
K028 - Mark Andy Press #664 (continuous narrow web printing operation utilizing flexographic and/or rotary screen transfer technology).	OAC rule 3745-31-05(A)(3)	Volatile organic compound (VOC) emissions from this emissions unit shall not exceed 12.58 lbs/hour and 11.30 tons per rolling, 12-month period from ink and coating usage. See Section A.2 and Section B The requirements of this rule also include compliance with the requirements of OAC rule(s) 3745-21-09(Y)(2)(B); and 3745-35-07(B). The requirements of this rule also include compliance with the requirements of 40 CFR 60 Subpart RR.
	OAC rule 3745-21-09(Y)(2)(B)	See Section B.1
	OAC rule 3745-35-07(B)	See Section A.2.a through A.2.c and B.1
	40 CFR, Part 60, Subpart RR	See Section A.2.e.

2. Additional Terms and Conditions

2.a The maximum annual combined VOC emissions generated by all cleanup material at this facility* shall not exceed 17.8 tons per year, based on a rolling, 12-month summation of emissions.

2.b The maximum annual combined Hazardous Air Pollutant (HAP) emissions generated by all printing lines and associated cleanup activities at this facility* shall not exceed 9.9 tons per year for any single HAP and 24.9 tons per year for combined HAPs, based on a rolling, 12-month summation of emissions.

2.c The maximum annual combined VOC emissions generated by all printing lines and associated cleanup activities at this facility* shall not exceed 98.0 tons per year, based on a rolling, 12-month summation of emissions.

2.d The hourly emission limitation was established to reflect the potential to emit for this emissions unit**. Therefore, it is not necessary to develop and maintain daily record keeping requirements to ensure compliance with the hourly VOC emission limit.

2.e The amount of VOC emissions from this emissions unit could never equal or exceed 45 megagrams (49.59 tons) per rolling,12-month period, without also sustaining a major violation of the rolling 12-month VOC limit for this unit. Therefore the permittee shall not be subject the emission limitation of 0.20 kg VOC/kg of coating solids applied, as required in 40 CFR 60.442(a)(1) or the control requirements in 60.442(a)(2), Subpart RR.

* the emission limits for the facility shall include emission units numbered K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K013, K014, K015, K016, K028, and all future narrow web flexographic printing lines.

** the potential to emit calculations were developed using historical facility data and equations supplied by the facility.

B. Operational Restrictions

1. The total maximum coating and ink usage in all the narrow web flexographic printing lines at this facility (including emission units numbered K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K013, K014, K015, K016, K028, and all future narrow web flexographic printing lines) shall not exceed 148 tons per year, based upon a rolling, 12-month summation of the ink and coating usage.

2. To ensure enforceability during the first twelve calendar months of operation following the issuance of this permit, actual emissions calculated from material usage records over the previous 12 calendar months of operation shall be used to calculate the rolling, 12-month emissions from this emissions unit and the facility.

C. Monitoring and/or Recordkeeping Requirements

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

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

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

   c. the individual and combined HAP content of each ink and coating employed, in pounds per gallon or pound per pound of ink or coating, as applied;

d. the density of each ink and coating employed, in pounds per gallon, as applied;

e. the amount of each ink and coating applied, in gallons or pounds;

f. the total VOC emissions from all inks and coatings, calculated as the summation of (b x e) for all inks and coatings applied, in pounds per month;

g. the total individual and combined HAP emissions from all inks and coatings, calculated as the summation of c x e) for all inks and coatings, in pounds per month;

h. the actual run, press hours for this emissions unit, hours per month;

i. the average hourly VOC emissions, calculated as (f / h), in pounds per hour;

j. the total ink and coating usage, calculated as [(d) x (e)] if records are maintained in gallons, or (e) if records are maintained in pounds; and

k. the rolling, 12-month summation of VOC emissions, from all inks and coatings, in pounds or tons.

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

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

b. the VOC content of each cleanup material employed, in pounds per gallon or pounds per pound of cleanup material, as applied;

c. the individual and combined HAP content of each cleanup material employed, in pounds per gallon or pounds per pound of cleanup material, as applied;

d. the amount, in gallons or pounds, of each cleanup material applied;

e. if a credit for recovered cleanup/purge 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 cleanup and purge material collected and added to the recovery tank/drum, for recycle, recovery, and/or disposal at an outside facility, shall be maintained as required in Section C.3;

f. if a credit for recovered cleanup/purge material is used, the volume or weight of this material added to the recovery tank/drum, in gallons or pounds per month;

g. if a credit for recovered materials is used, the adjusted volume or weight of cleanup/purge materials employed, calculate by subtracting the volume or weight of the recovered cleanup/purge material added to the recovery tank/drum (f), from the volume or weight of the total cleanup/purge material applied (d), in gallons or pounds per month;

h. the total VOC emissions from cleanup materials, calculated as the summation of (b x g) for all cleanup materials applied, in pounds or tons per month;

i. the rolling, 12-month summation of VOC emissions from all cleanup materials applied in all the facility's narrow web flexographic printing presses, in tons;

j. the total individual and combined HAP emissions from cleanup materials, calculated as the summation of [(c) x (g)] for all cleanup materials applied during the month;

k. the total individual and combined HAP emissions from all inks, coatings, and the cleanup materials applied, in pounds or tons, per month;

l. the total rolling, 12-month summation of each individual HAP and the combined HAPs from all ink, coating, and cleanup material usage, on all the narrow web flexographic printing lines at this facility, in tons;

m. the total VOC emissions from all ink, coating, and cleanup material usage, for all flexographic printing lines at this facility, in pounds or tons;

n. the total rolling, 12-month summation of VOC emissions, for all flexographic printing lines at this facility, in tons; and

o. the total combined rolling, 12-month summation of the amount of ink and coating applied in all flexographic printing lines at this facility, in tons.

* the facility printing lines include emission units numbered K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K013, K014, K015, K016, K028, and all future narrow web flexographic printing lines.

3. If a credit for recovered materials from this emissions unit is used to demonstrate compliance and/or used in calculations for emission reports, the permittee shall maintain the following records for the recovered cleanup and purge 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; and

   b. the number of gallons or pounds of materials from the recovery drum or tank shipped off site.

4. The permit to install for this emissions unit was evaluated based on the actual materials (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:

a. Pollutant: Ethanol
TLV (mg/m3): 1884.25
Maximum Hourly Emission Rate (lbs/hr): 1.26 (12.58 * 10.0 wt %)
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 26.69
MAGLC (ug/m3): 44863.18

b. Pollutant: Heptane
TLV (mg/m3): 1639.26
Maximum Hourly Emission Rate (lbs/hr): 1.67 (12.58 * 13.25 wt %)
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 35.37
MAGLC (ug/m3): 39030.09

c. Pollutant: N-propyl alcohol
TLV (mg/m3): 491.53
Maximum Hourly Emission Rate (lbs/hr): 3.77 (12.58 * 30.0 wt %)
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 80.08
MAGLC (ug/m3): 11703.18

d. Pollutant: Isopropyl alcohol
TLV (mg/m3): 983.07
Maximum Hourly Emission Rate (lbs/hr): 0.48 (12.58 * 3.82 wt %)
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 10.2
MAGLC (ug/m3): 23406.37

e. Pollutant: N-propyl acetate
TLV (mg/m3): 835.42
Maximum Hourly Emission Rate (lbs/hr): 0.44 (12.58 * 3.53 wt %)
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 9.42
MAGLC (ug/m3): 19890.93

f. Pollutant: N-propyl acetate
TLV (mg/m3): 835.42

Maximum Hourly Emission Rate (lbs/hr): 12.58 (cleanup emissions)
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 266.95
MAGLC (ug/m3): 19890.93

g. Pollutant: Ethyl Acetate
TLV (mg/m3): 1441.31
Maximum Hourly Emission Rate (lbs/hr): 12.58 (cleanup emissions)
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 266.95
MAGLC (ug/m3): 34316.88

5. 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 (inks, 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

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

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

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

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports* which include the following information for this emissions unit:

   a. an identification of each month during which the average hourly VOC emissions, from the use of inks and coatings in this emissions unit, exceed the 12.58 lbs/hour, and the actual average hourly VOC emissions for each such month;

b. an identification of each month during which the rolling, 12-month VOC emissions, from the use of inks and coatings in this emissions unit, exceed 11.30 tons, and the actual rolling, 12-month VOC emissions for each such month; and

c. an identification of each month in which a credit to the emissions was applied for recovered cleanup/purge materials, and in which records were not also maintained as required in Section C.3 for the materials shipped offsite.

* all deviation (excursion) reports shall include a copy of such record and shall be sent to the Cleveland Division of Air Quality (Cleveland DAQ) within 30 days following the end of the calendar month during which they were identified.

2. The permittee shall submit deviation (excursion) reports* which include the following information for this facility (the facility includes emission units numbered K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K013, K014, K015, K016, K028, and all future narrow web flexographic printing lines):

a. an identification of each month during which the rolling, 12-month HAP emissions exceed 9.9 tons for any single HAP and 24.9 tons for combined HAPs, based on a rolling, 12-month summation of emissions from all materials applied on all lines;

b. an identification of each month during which the rolling, 12-month ink and coating usage for the facility exceeded 148 tons;

c. an identification of each month during which the rolling, 12-month VOC emissions exceed 98 tons based on a rolling, 12-month summation of emissions from all materials applied on all lines; and

d. an identification of each month during which the rolling, 12-month VOC emissions from the cleanup materials applied on all printing lines at the facility, exceed 17.8 tons, based on a rolling, 12-month summation of the emissions from cleanup and purge materials applied on all lines.

* all deviation (excursion) reports 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 they were identified.

V. Testing Requirements

1. Compliance with the emission limitations in section A.1 of these terms and conditions shall be

determined in accordance with the following methods:

a. Emission Limitation:
12.58 lbs of VOC / hour from ink and coating usage

Applicable Compliance Method:
Compliance shall be determined based upon the record keeping specified in section C.1.

b. Emission Limitation:
11.3 tons of VOC per rolling, 12-month period from ink and coating usage

Applicable Compliance Method:
Compliance shall be determined based upon the recordkeeping specified in section C.1.

c. Emission Limitation:
17.8 tons VOC per rolling, 12-month period from all cleanup and purge materials applied in all printing lines at the facility*

Applicable Compliance Method:
Compliance shall be determined based upon the record keeping specified in section C.2.

d. Emission Limitation:
9.9 tons of any single HAP per rolling, 12-month period and 24.9 tons of combined HAPs per rolling, 12-month period from the application of all materials on all printing lines at this facility*

Applicable Compliance Method:
Compliance shall be determined based on the recordkeeping specified in section C.2.

e. Emission Limitation:
98 tons VOC per rolling, 12-month period from all printing lines at this facility*

Applicable Compliance Method:
Compliance shall be determined based on the recordkeeping specified in section C.2.

* the emission limits for the facility shall include emission units numbered K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K013, K014, K015, K016, K028 and all future narrow web flexographic printing lines.

VI. Miscellaneous Requirements

None