



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

Lazarus Gov.
Center

**RE: DRAFT PERMIT TO INSTALL
CUYAHOGA COUNTY
Application No: 13-04014**

CERTIFIED MAIL

DATE: 8/2/2002

Weyerhaeuser Company
Sharon McCrea
6100 Hillcrest Drive
Valley View, OH

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 or 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 **\$2200** 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

CBAPC

Synthetic Minor Determination and/or **Netting Determination**

Permit To Install **13-04014**

A. Source Description

Weyerhaeuser Packaging, Inc. has submitted a permit to install application for eleven emissions units at their Valley View facility. The facility was previously owned by MacMillan Bloedel Containers, until Weyerhaeuser bought the facility in 1999 (approximately). MacMillan Bloedel Containers installed 11 emissions units in 1994, and submitted permit to install applications. According to a letter dated April 28, 1994 from a consultant for MacMillan, the emissions units had a potential to emit of less than 10 pounds per day, and thus were considered de minimis and the applications were returned. After the Weyerhaeuser Packaging, Inc. located in Bedford, Ohio was inspected by CLAA in 2001 and required to submit permit applications, the facility in Valley View discovered the need for permits. The Valley View facility has removed one of the emissions units, and is trying to get a permit to install for a replacement line. Weyerhaeuser submitted applications in order to receive a synthetic minor for all emissions units at the facility.

B. Facility Emissions and Attainment Status

This facility has Title V status due to the facility emitting VOC emissions in excess of 100 TPY. However, the synthetic minor restrictions would limit the PTE to below Title V thresholds. Cuyahoga County is designated as attainment for ozone (1-hr average).

C. Source Emissions

These sources have the potential to emit (PTE) more than 100 TPY of VOC (131.07 TPY) when combined, resulting in Title V applicability. The permittee has chosen to restrict VOC emissions from these sources below the 100 TPY Title V threshold, by restricting volatile organic material usage below 99.0 tons/yr. The permittee has chosen to restrict HAP emissions below the 10 TPY individual and 25 TPY combined Title V thresholds. In addition, we have been informed by USEPA Region V that, since this facility is utilizing the option within Subpart KK of restricting HAPs use to below the major source levels, they will be not be considered a Title V facility due to MACT applicability. Therefore, the facility is not subject to Title V.

D. Conclusion

Weyerhaeuser has chosen to limit the production capabilities of this facility resulting in allowable VOC emissions of 99.0 TPY, which is below the Title V threshold of 100 TPY. The individual and combined HAP emissions are also being limited to 10.0 TPY and 25.0 TPY respectively, which is below both the individual and combined HAP thresholds of Title V. Due to these limits, Title V is not applicable.



**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 13-04014

Application Number: 13-04014
APS Premise Number: 1318577915
Permit Fee: **To be entered upon final issuance**
Name of Facility: Weyerhaeuser Company
Person to Contact: Sharon McCrea
Address: 6100 Hillcrest Drive
Valley View, OH 44125

Location of proposed air contaminant source(s) [emissions unit(s)]:
**6100 Hillcrest Drive
Valley View, Ohio**

Description of proposed emissions unit(s):
Chapter 31 modification to increase the allowable VOC and HAP emission limits for K001 through K011.

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 Related to Monitoring and Recordkeeping 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

Issued: To be entered upon final issuance

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 application must be made to the Director for the installation or modification of any other emissions unit(s).

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

Wey

PTI

Emissions Unit ID: **K001**

Issued: To be entered upon final issuance

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 thirty (30) 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.

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	99.0
Individual HAPs	10.0
Combined HAPs	25.0

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

Wey

PTI

Emissions Unit ID: **K001**

Issued: To be entered upon final issuance

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

K001 - 30 inch Wolverine Printer Singlefacer (Machine 107) OAC rule 3745-31-05(A)(3)

OAC rule 3745-21-09(Y)(1)(a)(ii)

40 CFR 63 Subpart KK

OAC rule 3745-35-07(B)
Synthetic Minor to avoid Title V

Wey

PTI

Emissions Unit ID: **K001**

Issued: To be entered upon final issuance

Applicable Emissions <u>Limitations/Control Measures</u>	99.0 tons VOC/yr for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 from a combination of inks, coatings and adhesives.*
65.92 lbs VOC/day for K001 from a combination of inks, coatings and adhesives.	* as a 12-month rolling summation
12.03 tons VOC/year for K001 from a combination of inks, coatings and adhesives.*	See Section A.2.a VOC content of each coating and ink not to exceed 25 percent VOC by volume of the volatile matter in the coating and ink, as applied.
0.45 ton VOC/year for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 for all cleanup material.*	
* as a 12-month rolling summation	
The requirements of BAT also include compliance with the requirements of OAC rule 3745-21-09(Y)(1)(a)(ii) and 3745-35-07(B).	
See Section A.2.b.	
10.0 tons of any individual HAP/yr for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 from a combination of inks, coatings, adhesives and cleanup.*	
25.0 tons of combined HAPs/yr for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 from a combination of inks, coatings, adhesives and cleanup.*	

Wey

PTI

Emissions Unit ID: **K001**

Issued: To be entered upon final issuance

2. Additional Terms and Conditions

2.a The total allowable usage and emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from the eleven sources in this permit shall not exceed 10.0 tons/year for any individual HAP and 25.0 tons/year for any combination of HAPs. VOC emissions for the eleven emissions units in this permit are restricted to 99.0 tons/year. Compliance with the above limitations shall be based upon a rolling, 12-month summation.

2.b In order to comply with the requirements of 40 CFR, Part 63, Subpart KK, the permittee has chosen to comply with 40 CFR 63.820(a)(2). The combined emissions from the entire facility shall not exceed the following as a rolling, 12-month summation:

- i. Use less than 9.1 Mg (10 tons) per each rolling 12-month period of each HAP at the facility, including materials used for source categories or purposes other than printing and publishing, and
- ii. Use less than 22.7 Mg (25 tons) per each rolling 12-month period of any combination of HAP at the facility, including materials used for source categories or purposes other than printing and publishing.

2.c The daily and annual VOC emission limitations are based on the emissions unit's potential to emit. Therefore, no record keeping or reporting is required to demonstrate compliance with these limits.

B. Operational Restrictions

1. The maximum annual volatile organic material usage (from inks, coatings and adhesive) for K001 - K011 shall not exceed 99.0 tons, based upon a rolling, 12-month summation of the volatile organic material figures.

The maximum annual HAPs material usage (from inks, coatings and adhesive) for K001 - K011 shall not exceed 10.0 tons/year for any individual HAP and 25.0 tons/year for any combination of HAPs, based upon a rolling, 12-month summation of the HAPs material usage figures.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the volatile organic material usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Volatile Organic Material Usage for K001 - K011	Maximum Allowable Cumulative Individual HAPs Material Usage for K001 - K011	Maximum Allowable Cumulative Combined HAPs Material Usage for K001 - K011
1	15 tons	2.0 tons	6.0 tons
1-2	25 tons	3.0 tons	8.0 tons
1-3	35 tons	4.0 tons	10.0 tons
1-4	45 tons	5.0 tons	12.0 tons
1-5	55 tons	6.0 tons	14.0 tons
1-6	65 tons	7.0 tons	16.0 tons
1-7	75 tons	7.5 tons	18.0 tons
1-8	80 tons	8.0 tons	20.0 tons
1-9	85 tons	8.5 tons	22.0 tons
1-10	90 tons	9.0 tons	23.0 tons
1-11	95 tons	9.5 tons	24.0 tons
1-12	99.0 tons	10.0 tons	25.0 tons

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

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the VOC content of each coating and ink, in percent VOC by volume of the volatile matter in the coating and ink, as applied [calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{VOC,6}$].
2. The permittee shall collect and record the following information each month on a facility-wide basis, for emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011:
 - a. the name and identification number of each ink, coating, adhesive and cleanup material employed;
 - b. the weight, in pounds per month, of each ink, coating, adhesive and cleanup material employed, as applied;
 - c. the VOC content of each ink, coating, adhesive and cleanup material, as applied, in percent by weight;
 - d. the total volatile organic material usage and VOC emissions from all inks, coatings, and

Wey

PTI

Emissions Unit ID: **K001**

Issued: To be entered upon final issuance

- adhesives (calculated by summing the records from b x c), in pounds per month;
- e. the rolling, 12-month summation of volatile organic material usage and VOC emissions from all inks, coatings, and adhesives, in tons;
- f. the total VOC emissions from all cleanup materials (b x c), in pounds per month;
- g. the rolling, 12-month summation of VOC emissions from all cleanup materials, in tons;
- h. the individual and combined HAPs contents of each ink, coating, adhesive and cleanup material, as applied, in percent by weight;
- i. the total individual and combined HAPs material usage and emissions from all inks, coatings, adhesives and cleanup materials (b x h for each material), in pounds per month; and
- j. the rolling, 12-month summation of individual HAPs and combined HAPs material usage and emissions from all inks, coatings, adhesives, and cleanup material, in tons.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings and inks (for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall submit deviation (excursion) reports which include the following information for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011:
 - a. an identification of each month during which the rolling, 12-month individual HAP material usage and emissions, from the use of inks, coatings, adhesives, and cleanup material in these emissions units, exceed 10.0 tons/yr based on a rolling, 12-month summation, and the actual rolling, 12-month individual HAP emissions for each such month;
 - b. an identification of each month during which the rolling, 12-month combined HAP material usage and emissions, from the use of inks, coatings, adhesives, and cleanup material in these emissions units, exceed 25.0 tons/yr based on a rolling, 12-month summation, and the actual rolling, 12-month combined HAP emissions for each such month;

Issue

Emissions Unit ID: **K001**

- c. an identification of each month during which the rolling, 12-month VOC emissions, from the use of inks, coatings, and adhesives in these emissions unit, exceed 99.0 tons/yr based on a rolling, 12-month summation, and the actual rolling, 12-month VOC emissions for each such month;
- d. an identification of each month during which the rolling, 12-month volatile organic material usage exceeded 99.0 tons, and the actual rolling, 12-month usage; and
- e. an identification of each month during which the rolling, 12-month VOC emissions, from the use of cleanup materials in these emissions unit, exceed 0.45 ton/yr based on a rolling, 12-month summation, and the actual rolling, 12-month VOC emissions for each such month.

All deviation (excursion) reports shall be submitted in accordance with Section A.1. of the General Terms and Conditions of this permit.

3. As required by 40 CFR 63.830(b)(1), the permittee shall submit to the appropriate Ohio EPA District Office or local air agency an initial notification report no later than May 30, 1998, that contains the following information:
 - a. the name, title and address of the owner or operator;
 - b. the address (i.e., physical location) of the affected source;
 - c. identification of the applicable emission limitations and compliance date;
 - d. a statement of whether the affected emissions unit is located at a major source or at an area source; and
 - e. a brief description of each affected emissions unit, including the type of process operation performed.

E. Testing Requirements

1. Compliance with the emission limitation(s) and operational restriction specified in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation:

65.92 lbs VOC/day for K001 from a combination of inks, coatings and adhesives.

Applicable Compliance Method:

Emissions Unit ID: **K001**

This emission limitation is based upon the unit's potential to emit, which is determined by multiplying the maximum hourly line speed (ft/hr) times the maximum print/coat width (in feet) times the max ink/coating/adhesive usage rate (lbs/Msf) times the maximum VOC content (percent by weight) times 24 hours per day.

b. Emission Limitation:

12.03 tons VOC/year for K001 from a combination of inks, coatings and adhesives, as a 12-month rolling summation.

Applicable Compliance Method:

The annual emission limitation for this emissions unit was established by multiplying the daily emission rate by 365 days of operation per year and dividing by 2000 pounds per ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the pounds per day limitation.

c. Emission Limitation:

0.45 ton VOC/year for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 for all cleanup material, as a 12-month rolling summation.

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping specified in Section C.2.g.

d. Emission Limitation:

99.0 tons VOC/yr for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 from a combination of inks, coatings and adhesives, as a 12-month rolling summation.

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping specified in Section C.2.e.

e. Emission Limitation:

10.0 tons individual HAPs/yr for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 from a combination of inks, coatings, adhesives and cleanup, as a 12-month rolling summation.

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping specified in Section C.2.j.

f. Emission Limitation:

25.0 tons combined HAPs/yr for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 from a combination of inks, coatings, adhesives and cleanup, as a 12-month rolling summation.

Wey

PTI

Emissions Unit ID: **K002**

Issued: To be entered upon final issuance

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping specified in Section C.2.j.

g. Emission Limitation:

VOC content of each coating and ink not to exceed 25 percent VOC by volume of the volatile matter of the coating and ink, as applied.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section C.2. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24A shall be used to determine the VOC contents of the coatings and inks. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24A.

F. Miscellaneous Requirements

1. The requirements of this permit to install shall supercede the requirements of PTI number 13-03938 issued July 3, 2002.

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

A. Applicable Emissions Limitations and/or Control Requirements

Issued: To be entered upon final issuance

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>
K002 - 30 inch Wolverine Printer Singlefacer (Machine 108)	OAC rule 3745-31-05(A)(3)
	OAC rule 3745-21-09(Y)(1)(a)(ii)
	40 CFR 63 Subpart KK
	OAC rule 3745-35-07(B) Synthetic Minor to avoid Title V

Wey

PTI

Issued: To be entered upon final issuance

Emissions Unit ID: **K002**

<u>Applicable Emissions Limitations/Control Measures</u>	99.0 tons VOC/yr for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 from a combination of inks, coatings and adhesives.*
62.88 lbs VOC/day for K001 from a combination of inks, coatings and adhesives.	* as a 12-month rolling summation
11.48 tons VOC/year for K001 from a combination of inks, coatings and adhesives.*	See Section A.2.a
0.45 ton VOC/year for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 for all cleanup material.*	VOC content of each coating and ink not to exceed 25 percent VOC by volume of the volatile matter in the coating and ink, as applied.
* as a 12-month rolling summation	
The requirements of BAT also include compliance with the requirements of OAC rule 3745-21-09(Y)(1)(a)(ii) and 3745-35-07(B).	
See Section A.2.b.	
10.0 tons of any individual HAP/yr for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 from a combination of inks, coatings, adhesives and cleanup.*	
25.0 tons of combined HAPs/yr for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 from a combination of inks, coatings, adhesives and cleanup.*	

Issued: To be entered upon final issuance

2. Additional Terms and Conditions

2.a The total allowable usage and emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from the eleven sources in this permit shall not exceed 10.0 tons/year for any individual HAP and 25.0 tons/year for any combination of HAPs. VOC emissions for the eleven emissions units in this permit are restricted to 99.0 tons/year. Compliance with the above limitations shall be based upon a rolling, 12-month summation.

2.b In order to comply with the requirements of 40 CFR, Part 63, Subpart KK, the permittee has chosen to comply with 40 CFR 63.820(a)(2). The combined emissions from the entire facility shall not exceed the following as a rolling, 12-month summation:

- i. Use less than 9.1 Mg (10 tons) per each rolling 12-month period of each HAP at the facility, including materials used for source categories or purposes other than printing and publishing, and
- ii. Use less than 22.7 Mg (25 tons) per each rolling 12-month period of any combination of HAP at the facility, including materials used for source categories or purposes other than printing and publishing.

2.c The daily and annual VOC emission limitations are based on the emissions unit's potential to emit. Therefore, no record keeping or reporting is required to demonstrate compliance with these limits.

B. Operational Restrictions

1. The maximum annual volatile organic material usage (from inks, coatings and adhesive) for K001 - K011 shall not exceed 99.0 tons, based upon a rolling, 12-month summation of the volatile organic material figures.

The maximum annual HAPs material usage (from inks, coatings and adhesive) for K001 - K011 shall not exceed 10.0 tons/year for any individual HAP and 25.0 tons/year for any combination of HAPs, based upon a rolling, 12-month summation of the HAPs material usage figures.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the volatile organic material usage levels specified in the following table:

Month(s)

	Maximum Allowable Cumulative Volatile Organic Material Usage for K001 - K011	Maximum Allowable Cumulative Individual HAPs Material Usage for K001 - K011	Maximum Allowable Cumulative Combined HAPs Material Usage for K001 - K011
1	15 tons	2.0 tons	6.0 tons
1-2	25 tons	3.0 tons	8.0 tons
1-3	35 tons	4.0 tons	10.0 tons
1-4	45 tons	5.0 tons	12.0 tons
1-5	55 tons	6.0 tons	14.0 tons
1-6	65 tons	7.0 tons	16.0 tons
1-7	75 tons	7.5 tons	18.0 tons
1-8	80 tons	8.0 tons	20.0 tons
1-9	85 tons	8.5 tons	22.0 tons
1-10	90 tons	9.0 tons	23.0 tons
1-11	95 tons	9.5 tons	24.0 tons
1-12	99.0 tons	10.0 tons	25.0 tons

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

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the VOC content of each coating and ink, in percent VOC by volume of the volatile matter in the coating and ink, as applied [calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{VOC,6}$].
2. The permittee shall collect and record the following information each month on a facility-wide basis, for emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011:
 - a. the name and identification number of each ink, coating, adhesive and cleanup material employed;
 - b. the weight, in pounds per month, of each ink, coating, adhesive and cleanup material employed, as applied;
 - c. the VOC content of each ink, coating, adhesive and cleanup material, as applied, in percent by weight;

Issued: To be entered upon final issuance

- d. the total volatile organic material usage and VOC emissions from all inks, coatings, and adhesives (calculated by summing the records from b x c), in pounds per month;
- e. the rolling, 12-month summation of volatile organic material usage and VOC emissions from all inks, coatings, and adhesives, in tons;
- f. the total VOC emissions from all cleanup materials (b x c), in pounds per month;
- g. the rolling, 12-month summation of VOC emissions from all cleanup materials, in tons;
- h. the individual and combined HAPs contents of each ink, coating, adhesive and cleanup material, as applied, in percent by weight;
- i. the total individual and combined HAPs material usage and emissions from all inks, coatings, adhesives and cleanup materials (b x h for each material), in pounds per month; and
- j. the rolling, 12-month summation of individual HAPs and combined HAPs material usage and emissions from all inks, coatings, adhesives, and cleanup material, in tons.

D. Reporting Requirements

- 1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings and inks (for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
- 2. The permittee shall submit deviation (excursion) reports which include the following information for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011:
 - a. an identification of each month during which the rolling, 12-month individual HAP material usage and emissions, from the use of inks, coatings, adhesives, and cleanup material in these emissions units, exceed 10.0 tons/yr based on a rolling, 12-month summation, and the actual rolling, 12-month individual HAP emissions for each such month;
 - b. an identification of each month during which the rolling, 12-month combined HAP material usage and emissions, from the use of inks, coatings, adhesives, and cleanup material in these emissions units, exceed 25.0 tons/yr based on a rolling, 12-month

Emissions Unit ID: **K002**

summation, and the actual rolling, 12-month combined HAP emissions for each such month;

- c. an identification of each month during which the rolling, 12-month VOC emissions, from the use of inks, coatings, and adhesives in these emissions unit, exceed 99.0 tons/yr based on a rolling, 12-month summation, and the actual rolling, 12-month VOC emissions for each such month;
- d. an identification of each month during which the rolling, 12-month volatile organic material usage exceeded 99.0 tons, and the actual rolling, 12-month usage; and
- e. an identification of each month during which the rolling, 12-month VOC emissions, from the use of cleanup materials in these emissions unit, exceed 0.45 ton/yr based on a rolling, 12-month summation, and the actual rolling, 12-month VOC emissions for each such month.

All deviation (excursion) reports shall be submitted in accordance with Section A.1. of the General Terms and Conditions of this permit.

3. As required by 40 CFR 63.830(b)(1), the permittee shall submit to the appropriate Ohio EPA District Office or local air agency an initial notification report no later than May 30, 1998, that contains the following information:
 - a. the name, title and address of the owner or operator;
 - b. the address (i.e., physical location) of the affected source;
 - c. identification of the applicable emission limitations and compliance date;
 - d. a statement of whether the affected emissions unit is located at a major source or at an area source; and
 - e. a brief description of each affected emissions unit, including the type of process operation performed.

E. Testing Requirements

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

Issued: To be entered upon final issuance

- a. Emission Limitation:

62.88 lbs VOC/day for K002 from a combination of inks, coatings and adhesives.

Applicable Compliance Method:
This emission limitation is based upon the unit's potential to emit, which is determined by multiplying the maximum hourly line speed (ft/hr) times the maximum print/coat width (in feet) times the max ink/coating/adhesive usage rate (lbs/Msf) times the maximum VOC content (percent by weight) times 24 hours per day.
- b. Emission Limitation:

11.48 tons VOC/year for K002 from a combination of inks, coatings and adhesives, as a 12-month rolling summation.

Applicable Compliance Method:
The annual emission limitation for this emissions unit was established by multiplying the daily emission rate by 365 days of operation per year and dividing by 2000 pounds per ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the pounds per day limitation.
- c. Emission Limitation:
0.45 ton VOC/year for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 for all cleanup material, as a 12-month rolling summation.

Applicable Compliance Method:
Compliance shall be determined based upon the record keeping specified in Section C.2.g.
- d. Emission Limitation:
99.0 tons VOC/yr for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 from a combination of inks, coatings and adhesives, as a 12-month rolling summation.

Applicable Compliance Method:
Compliance shall be determined based upon the record keeping specified in Section C.2.e.
- e. Emission Limitation:
10.0 tons individual HAPs/yr for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 from a combination of inks, coatings, adhesives and cleanup, as a 12-month rolling summation.

Wey

PTI

Issued: To be entered upon final issuance

Emissions Unit ID: **K002**

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping specified in Section C.2.j.

- f. Emission Limitation:
25.0 tons combined HAPs/yr for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 from a combination of inks, coatings, adhesives and cleanup, as a 12-month rolling summation.

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping specified in Section C.2.j.

- g. Emission Limitation:
VOC content of each coating and ink not to exceed 25 percent VOC by volume of the volatile matter of the coating and ink, as applied.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section C.2. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24A shall be used to determine the VOC contents of the coatings and inks. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24A.

F. Miscellaneous Requirements

1. The requirements of this permit to install shall supercede the requirements of PTI number 13-03938 issued July 3, 2002.

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>
K003 - 30 inch Wolverine Printer Singlefacer (Machine 109).	OAC rule 3745-31-05(A)(3)
	OAC rule 3745-21-09(Y)(1)(a)(ii)
	40 CFR 63 Subpart KK
	OAC rule 3745-35-07(B) Synthetic Minor to avoid Title V

Wey
PTI

Emissions Unit ID: **K003**

Issued: To be entered upon final issuance

<u>Applicable Emissions Limitations/Control Measures</u>	
62.88 lbs VOC/day for K001 from a combination of inks, coatings and adhesives.	99.0 tons VOC/yr for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 from a combination of inks, coatings and adhesives.*
11.48 tons VOC/year for K001 from a combination of inks, coatings and adhesives.*	* as a 12-month rolling summation
0.45 ton VOC/year for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 for all cleanup material.*	See Section A.2.a
* as a 12-month rolling summation	VOC content of each coating and ink not to exceed 25 percent VOC by volume of the volatile matter in the coating and ink, as applied.
The requirements of BAT also include compliance with the requirements of OAC rule 3745-21-09(Y)(1)(a)(ii) and 3745-35-07(B).	
See Section A.2.b.	
10.0 tons of any individual HAP/yr for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 from a combination of inks, coatings, adhesives and cleanup.*	
25.0 tons of combined HAPs/yr for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 from a combination of inks, coatings, adhesives and cleanup.*	

Issued: To be entered upon final issuance

2. Additional Terms and Conditions

2.a The total allowable usage and emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from the eleven sources in this permit shall not exceed 10.0 tons/year for any individual HAP and 25.0 tons/year for any combination of HAPs. VOC emissions for the eleven emissions units in this permit are restricted to 99.0 tons/year. Compliance with the above limitations shall be based upon a rolling, 12-month summation.

2.b In order to comply with the requirements of 40 CFR, Part 63, Subpart KK, the permittee has chosen to comply with 40 CFR 63.820(a)(2). The combined emissions from the entire facility shall not exceed the following as a rolling, 12-month summation:

- i. Use less than 9.1 Mg (10 tons) per each rolling 12-month period of each HAP at the facility, including materials used for source categories or purposes other than printing and publishing, and
- ii. Use less than 22.7 Mg (25 tons) per each rolling 12-month period of any combination of HAP at the facility, including materials used for source categories or purposes other than printing and publishing.

2.c The daily and annual VOC emission limitations are based on the emissions unit's potential to emit. Therefore, no record keeping or reporting is required to demonstrate compliance with these limits.

B. Operational Restrictions

- 1. The maximum annual volatile organic material usage (from inks, coatings and adhesive) for K001 - K011 shall not exceed 99.0 tons, based upon a rolling, 12-month summation of the volatile organic material figures.

The maximum annual HAPs material usage (from inks, coatings and adhesive) for K001 - K011 shall not exceed 10.0 tons/year for any individual HAP and 25.0 tons/year for any combination of HAPs, based upon a rolling, 12-month summation of the HAPs material usage figures.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the volatile organic material usage levels specified in the following table:

Month(s)

	Maximum Allowable Cumulative Volatile Organic Material Usage for K001 - K011	Maximum Allowable Cumulative Individual HAPs Material Usage for K001 - K011	Maximum Allowable Cumulative Combined HAPs Material Usage for K001 - K011
1	15 tons	2.0 tons	6.0 tons
1-2	25 tons	3.0 tons	8.0 tons
1-3	35 tons	4.0 tons	10.0 tons
1-4	45 tons	5.0 tons	12.0 tons
1-5	55 tons	6.0 tons	14.0 tons
1-6	65 tons	7.0 tons	16.0 tons
1-7	75 tons	7.5 tons	18.0 tons
1-8	80 tons	8.0 tons	20.0 tons
1-9	85 tons	8.5 tons	22.0 tons
1-10	90 tons	9.0 tons	23.0 tons
1-11	95 tons	9.5 tons	24.0 tons
1-12	99.0 tons	10.0 tons	25.0 tons

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

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the VOC content of each coating and ink, in percent VOC by volume of the volatile matter in the coating and ink, as applied [calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{VOC,6}$].
2. The permittee shall collect and record the following information each month on a facility-wide basis, for emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011:
 - a. the name and identification number of each ink, coating, adhesive and cleanup material employed;
 - b. the weight, in pounds per month, of each ink, coating, adhesive and cleanup material employed, as applied;
 - c. the VOC content of each ink, coating, adhesive and cleanup material, as applied, in percent by weight;

Issued: To be entered upon final issuance

- d. the total volatile organic material usage and VOC emissions from all inks, coatings, and adhesives (calculated by summing the records from b x c), in pounds per month;
- e. the rolling, 12-month summation of volatile organic material usage and VOC emissions from all inks, coatings, and adhesives, in tons;
- f. the total VOC emissions from all cleanup materials (b x c), in pounds per month;
- g. the rolling, 12-month summation of VOC emissions from all cleanup materials, in tons;
- h. the individual and combined HAPS contents of each ink, coating, adhesive and cleanup material, as applied, in percent by weight;
- i. the total individual and combined HAPs material usage and emissions from all inks, coatings, adhesives and cleanup materials (b x h for each material), in pounds per month; and
- j. the rolling, 12-month summation of individual HAPs and combined HAPs material usage and emissions from all inks, coatings, adhesives, and cleanup material, in tons.

D. Reporting Requirements

- 1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings and inks (for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
- 2. The permittee shall submit deviation (excursion) reports which include the following information for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011:
 - a. an identification of each month during which the rolling, 12-month individual HAP material usage and emissions, from the use of inks, coatings, adhesives, and cleanup material in these emissions units, exceed 10.0 tons/yr based on a rolling, 12-month summation, and the actual rolling, 12-month individual HAP emissions for each such month;
 - b. an identification of each month during which the rolling, 12-month combined HAP material usage and emissions, from the use of inks, coatings, adhesives, and cleanup material in these emissions units, exceed 25.0 tons/yr based on a rolling, 12-month

Emissions Unit ID: **K003**

summation, and the actual rolling, 12-month combined HAP emissions for each such month;

- c. an identification of each month during which the rolling, 12-month VOC emissions, from the use of inks, coatings, and adhesives in these emissions unit, exceed 99.0 tons/yr based on a rolling, 12-month summation, and the actual rolling, 12-month VOC emissions for each such month;
- d. an identification of each month during which the rolling, 12-month volatile organic material usage exceeded 99.0 tons, and the actual rolling, 12-month usage; and
- e. an identification of each month during which the rolling, 12-month VOC emissions, from the use of cleanup materials in these emissions unit, exceed 0.45 ton/yr based on a rolling, 12-month summation, and the actual rolling, 12-month VOC emissions for each such month.

All deviation (excursion) reports shall be submitted in accordance with Section A.1. of the General Terms and Conditions of this permit.

3. As required by 40 CFR 63.830(b)(1), the permittee shall submit to the appropriate Ohio EPA District Office or local air agency an initial notification report no later than May 30, 1998, that contains the following information:
 - a. the name, title and address of the owner or operator;
 - b. the address (i.e., physical location) of the affected source;
 - c. identification of the applicable emission limitations and compliance date;
 - d. a statement of whether the affected emissions unit is located at a major source or at an area source; and
 - e. a brief description of each affected emissions unit, including the type of process operation performed.

E. Testing Requirements

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

Issued: To be entered upon final issuance

- a. Emission Limitation:

62.88 lbs VOC/day for K003 from a combination of inks, coatings and adhesives.

Applicable Compliance Method:
This emission limitation is based upon the unit's potential to emit, which is determined by multiplying the maximum hourly line speed (ft/hr) times the maximum print/coat width (in feet) times the max ink/coating/adhesive usage rate (lbs/Msf) times the maximum VOC content (percent by weight) times 24 hours per day.
- b. Emission Limitation:

11.48 tons VOC/year for K003 from a combination of inks, coatings and adhesives, as a 12-month rolling summation.

Applicable Compliance Method:
The annual emission limitation for this emissions unit was established by multiplying the daily emission rate by 365 days of operation per year and dividing by 2000 pounds per ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the pounds per day limitation.
- c. Emission Limitation:

0.45 ton VOC/year for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 for all cleanup material, as a 12-month rolling summation.

Applicable Compliance Method:
Compliance shall be determined based upon the record keeping specified in Section C.2.g.
- d. Emission Limitation:

99.0 tons VOC/yr for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 from a combination of inks, coatings and adhesives, as a 12-month rolling summation.

Applicable Compliance Method:
Compliance shall be determined based upon the record keeping specified in Section C.2.e.
- e. Emission Limitation:

10.0 tons individual HAPs/yr for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 from a combination of inks, coatings, adhesives and cleanup, as a 12-month rolling summation.

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping specified in Section C.2.j.

- f. Emission Limitation:
25.0 tons combined HAPs/yr for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 from a combination of inks, coatings, adhesives and cleanup, as a 12-month rolling summation.

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping specified in Section C.2.j.

- g. Emission Limitation:
VOC content of each coating and ink not to exceed 25 percent VOC by volume of the volatile matter of the coating and ink, as applied.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section C.2. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24A shall be used to determine the VOC contents of the coatings and inks. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24A.

F. Miscellaneous Requirements

1. The requirements of this permit to install shall supercede the requirements of PTI number 13-03938 issued July 3, 2002.

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>
K004 - 40 inch Wolverine Printer Singlefacer (Machine 110).	OAC rule 3745-31-05(A)(3)
	OAC rule 3745-21-09(Y)(1)(a)(ii)
	40 CFR 63 Subpart KK
	OAC rule 3745-35-07(B) Synthetic Minor to avoid Title V

Wey

PTI

Issued: To be entered upon final issuance

Emissions Unit ID: **K004**

Applicable Emissions Limitations/Control Measures	99.0 tons VOC/yr for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 from a combination of inks, coatings and adhesives.*
86.64 lbs VOC/day for K001 from a combination of inks, coatings and adhesives.	* as a 12-month rolling summation
15.81 tons VOC/year for K001 from a combination of inks, coatings and adhesives.*	See Section A.2.a
0.45 ton VOC/year for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 for all cleanup material.*	VOC content of each coating and ink not to exceed 25 percent VOC by volume of the volatile matter in the coating and ink, as applied.
* as a 12-month rolling summation	
The requirements of BAT also include compliance with the requirements of OAC rule 3745-21-09(Y)(1)(a)(ii) and 3745-35-07(B).	
See Section A.2.b.	
10.0 tons of any individual HAP/yr for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 from a combination of inks, coatings, adhesives and cleanup.*	
25.0 tons of combined HAPs/yr for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 from a combination of inks, coatings, adhesives and cleanup.*	

Issued: To be entered upon final issuance**2. Additional Terms and Conditions**

- 2.a** The total allowable usage and emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from the eleven sources in this permit shall not exceed 10.0 tons/year for any individual HAP and 25.0 tons/year for any combination of HAPs. VOC emissions for the eleven emissions units in this permit are restricted to 99.0 tons/year. Compliance with the above limitations shall be based upon a rolling, 12-month summation.
- 2.b** In order to comply with the requirements of 40 CFR, Part 63, Subpart KK, the permittee has chosen to comply with 40 CFR 63.820(a)(2). The combined emissions from the entire facility shall not exceed the following as a rolling, 12-month summation:
- i. Use less than 9.1 Mg (10 tons) per each rolling 12-month period of each HAP at the facility, including materials used for source categories or purposes other than printing and publishing, and
 - ii. Use less than 22.7 Mg (25 tons) per each rolling 12-month period of any combination of HAP at the facility, including materials used for source categories or purposes other than printing and publishing.
- 2.c** The daily and annual VOC emission limitations are based on the emissions unit's potential to emit. Therefore, no record keeping or reporting is required to demonstrate compliance with these limits.

B. Operational Restrictions

1. The maximum annual volatile organic material usage (from inks, coatings and adhesive) for K001 - K011 shall not exceed 99.0 tons, based upon a rolling, 12-month summation of the volatile organic material figures.

The maximum annual HAPs material usage (from inks, coatings and adhesive) for K001 - K011 shall not exceed 10.0 tons/year for any individual HAP and 25.0 tons/year for any combination of HAPs, based upon a rolling, 12-month summation of the HAPs material usage figures.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the volatile organic material usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Volatile Organic Material Usage for K001 - K011	Maximum Allowable Cumulative Individual HAPs Material Usage for K001 - K011	Maximum Allowable Cumulative Combined HAPs Material Usage for K001 - K011
1	15 tons	2.0 tons	6.0 tons
1-2	25 tons	3.0 tons	8.0 tons
1-3	35 tons	4.0 tons	10.0 tons
1-4	45 tons	5.0 tons	12.0 tons
1-5	55 tons	6.0 tons	14.0 tons
1-6	65 tons	7.0 tons	16.0 tons
1-7	75 tons	7.5 tons	18.0 tons
1-8	80 tons	8.0 tons	20.0 tons
1-9	85 tons	8.5 tons	22.0 tons
1-10	90 tons	9.0 tons	23.0 tons
1-11	95 tons	9.5 tons	24.0 tons
1-12	99.0 tons	10.0 tons	25.0 tons

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

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the VOC content of each coating and ink, in percent VOC by volume of the volatile matter in the coating and ink, as applied [calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{VOC,6}$].
2. The permittee shall collect and record the following information each month on a facility-wide basis, for emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011:
 - a. the name and identification number of each ink, coating, adhesive and cleanup material employed;
 - b. the weight, in pounds per month, of each ink, coating, adhesive and cleanup material employed, as applied;
 - c. the VOC content of each ink, coating, adhesive and cleanup material, as applied, in percent by weight;

Issued: To be entered upon final issuance

- d. the total volatile organic material usage and VOC emissions from all inks, coatings, and adhesives (calculated by summing the records from b x c), in pounds per month;
- e. the rolling, 12-month summation of volatile organic material usage and VOC emissions from all inks, coatings, and adhesives, in tons;
- f. the total VOC emissions from all cleanup materials (b x c), in pounds per month;
- g. the rolling, 12-month summation of VOC emissions from all cleanup materials, in tons;
- h. the individual and combined HAPs contents of each ink, coating, adhesive and cleanup material, as applied, in percent by weight;
- i. the total individual and combined HAPs material usage and emissions from all inks, coatings, adhesives and cleanup materials (b x h for each material), in pounds per month; and
- j. the rolling, 12-month summation of individual HAPs and combined HAPs material usage and emissions from all inks, coatings, adhesives, and cleanup material, in tons.

D. Reporting Requirements

- 1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings and inks (for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
- 2. The permittee shall submit deviation (excursion) reports which include the following information for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011:
 - a. an identification of each month during which the rolling, 12-month individual HAP material usage and emissions, from the use of inks, coatings, adhesives, and cleanup material in these emissions units, exceed 10.0 tons/yr based on a rolling, 12-month summation, and the actual rolling, 12-month individual HAP emissions for each such month;
 - b. an identification of each month during which the rolling, 12-month combined HAP material usage and emissions, from the use of inks, coatings, adhesives, and cleanup material in these emissions units, exceed 25.0 tons/yr based on a rolling, 12-month

summation, and the actual rolling, 12-month combined HAP emissions for each such month;

- c. an identification of each month during which the rolling, 12-month VOC emissions, from the use of inks, coatings, and adhesives in these emissions unit, exceed 99.0 tons/yr based on a rolling, 12-month summation, and the actual rolling, 12-month VOC emissions for each such month;
- d. an identification of each month during which the rolling, 12-month volatile organic material usage exceeded 99.0 tons, and the actual rolling, 12-month usage; and
- e. an identification of each month during which the rolling, 12-month VOC emissions, from the use of cleanup materials in these emissions unit, exceed 0.45 ton/yr based on a rolling, 12-month summation, and the actual rolling, 12-month VOC emissions for each such month.

All deviation (excursion) reports shall be submitted in accordance with Section A.1. of the General Terms and Conditions of this permit.

3. As required by 40 CFR 63.830(b)(1), the permittee shall submit to the appropriate Ohio EPA District Office or local air agency an initial notification report no later than May 30, 1998, that contains the following information:
 - a. the name, title and address of the owner or operator;
 - b. the address (i.e., physical location) of the affected source;
 - c. identification of the applicable emission limitations and compliance date;
 - d. a statement of whether the affected emissions unit is located at a major source or at an area source; and
 - e. a brief description of each affected emissions unit, including the type of process operation performed.

E. Testing Requirements

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

Issued: To be entered upon final issuance

a. Emission Limitation:

86.64 lbs VOC/day for K004 from a combination of inks, coatings and adhesives.

Applicable Compliance Method:

This emission limitation is based upon the unit's potential to emit, which is determined by multiplying the maximum hourly line speed (ft/hr) times the maximum print/coat width (in feet) times the max ink/coating/adhesive usage rate (lbs/Msf) times the maximum VOC content (percent by weight) times 24 hours per day.

b. Emission Limitation:

15.81 tons VOC/year for K004 from a combination of inks, coatings and adhesives, as a 12-month rolling summation.

Applicable Compliance Method:

The annual emission limitation for this emissions unit was established by multiplying the daily emission rate by 365 days of operation per year and dividing by 2000 pounds per ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the pounds per day limitation.

c. Emission Limitation:

0.45 ton VOC/year for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 for all cleanup material, as a 12-month rolling summation.

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping specified in Section C.2.g.

d. Emission Limitation:

99.0 tons VOC/yr for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 from a combination of inks, coatings and adhesives, as a 12-month rolling summation.

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping specified in Section C.2.e.

e. Emission Limitation:

10.0 tons individual HAPs/yr for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 from a combination of inks, coatings, adhesives and cleanup, as a 12-month rolling summation.

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping specified in Section C.2.j.

- f. Emission Limitation:
25.0 tons combined HAPs/yr for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 from a combination of inks, coatings, adhesives and cleanup, as a 12-month rolling summation.

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping specified in Section C.2.j.

- g. Emission Limitation:
VOC content of each coating and ink not to exceed 25 percent VOC by volume of the volatile matter of the coating and ink, as applied.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section C.2. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24A shall be used to determine the VOC contents of the coatings and inks. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24A.

F. Miscellaneous Requirements

1. The requirements of this permit to install shall supercede the requirements of PTI number 13-03938 issued July 3, 2002.

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>
K005 - 30 inch Wolverine Printer Singlefacer (Machine 113).	OAC rule 3745-31-05(A)(3)
	OAC rule 3745-21-09(Y)(1)(a)(ii)
	40 CFR 63 Subpart KK
	OAC rule 3745-35-07(B) Synthetic Minor to avoid Title V

Wey
PTI

Emissions Unit ID: **K005**

Issued: To be entered upon final issuance

<u>Applicable Emissions Limitations/Control Measures</u>	
62.88 lbs VOC/day for K001 from a combination of inks, coatings and adhesives.	cleanup.* 99.0 tons VOC/yr for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 from a combination of inks, coatings and adhesives.*
11.48 tons VOC/year for K001 from a combination of inks, coatings and adhesives.*	* as a 12-month rolling summation See Section A.2.a
0.45 ton VOC/year for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 for all cleanup material.*	VOC content of each coating and ink not to exceed 25 percent VOC by volume of the volatile matter in the coating and ink, as applied.
* as a 12-month rolling summation	
The requirements of BAT also include compliance with the requirements of OAC rule 3745-21-09(Y)(1)(a)(ii) and 3745-35-07(B).	
See Section A.2.b.	
10.0 tons of any individual HAP/yr for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 from a combination of inks, coatings, adhesives and cleanup.*	
25.0 tons of combined HAPs/yr for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 from a combination of inks, coatings, adhesives and	

2. Additional Terms and Conditions

- 2.a** The total allowable usage and emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from the eleven sources in this permit shall not exceed 10.0 tons/year for any individual HAP and 25.0 tons/year for any combination of HAPs. VOC emissions for the eleven emissions units in this permit are restricted to 99.0 tons/year. Compliance with the above limitations shall be based upon a rolling, 12-month summation.
- 2.b** In order to comply with the requirements of 40 CFR, Part 63, Subpart KK, the permittee has chosen to comply with 40 CFR 63.820(a)(2). The combined emissions from the entire facility shall not exceed the following as a rolling, 12-month summation:
- i. Use less than 9.1 Mg (10 tons) per each rolling 12-month period of each HAP at the facility, including materials used for source categories or purposes other than printing and publishing, and
 - ii. Use less than 22.7 Mg (25 tons) per each rolling 12-month period of any combination of HAP at the facility, including materials used for source categories or purposes other than printing and publishing.
- 2.c** The daily and annual VOC emission limitations are based on the emissions unit's potential to emit. Therefore, no record keeping or reporting is required to demonstrate compliance with these limits.

B. Operational Restrictions

1. The maximum annual volatile organic material usage (from inks, coatings and adhesive) for K001 - K011 shall not exceed 99.0 tons, based upon a rolling, 12-month summation of the volatile organic material figures.

The maximum annual HAPs material usage (from inks, coatings and adhesive) for K001 - K011 shall not exceed 10.0 tons/year for any individual HAP and 25.0 tons/year for any combination of HAPs, based upon a rolling, 12-month summation of the HAPs material usage figures.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the volatile organic material usage levels specified in the following table:

Issued: To be entered upon final issuance

Month(s)	Maximum Allowable Cumulative Volatile Organic Material Usage for K001 - K011	Maximum Allowable Cumulative Individual HAPs Material Usage for K001 - K011	Maximum Allowable Cumulative Combined HAPs Material Usage for K001 - K011
1	15 tons	2.0 tons	6.0 tons
1-2	25 tons	3.0 tons	8.0 tons
1-3	35 tons	4.0 tons	10.0 tons
1-4	45 tons	5.0 tons	12.0 tons
1-5	55 tons	6.0 tons	14.0 tons
1-6	65 tons	7.0 tons	16.0 tons
1-7	75 tons	7.5 tons	18.0 tons
1-8	80 tons	8.0 tons	20.0 tons
1-9	85 tons	8.5 tons	22.0 tons
1-10	90 tons	9.0 tons	23.0 tons
1-11	95 tons	9.5 tons	24.0 tons
1-12	99.0 tons	10.0 tons	25.0 tons

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

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the VOC content of each coating and ink, in percent VOC by volume of the volatile matter in the coating and ink, as applied [calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{VOC,6}$].
2. The permittee shall collect and record the following information each month on a facility-wide basis, for emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011:
 - a. the name and identification number of each ink, coating, adhesive and cleanup material employed;
 - b. the weight, in pounds per month, of each ink, coating, adhesive and cleanup material employed, as applied;
 - c. the VOC content of each ink, coating, adhesive and cleanup material, as applied, in

Issued: To be entered upon final issuance

- percent by weight;
- d. the total volatile organic material usage and VOC emissions from all inks, coatings, and adhesives (calculated by summing the records from b x c), in pounds per month;
 - e. the rolling, 12-month summation of volatile organic material usage and VOC emissions from all inks, coatings, and adhesives, in tons;
 - f. the total VOC emissions from all cleanup materials (b x c), in pounds per month;
 - g. the rolling, 12-month summation of VOC emissions from all cleanup materials, in tons;
 - h. the individual and combined HAPs contents of each ink, coating, adhesive and cleanup material, as applied, in percent by weight;
 - i. the total individual and combined HAPs material usage and emissions from all inks, coatings, adhesives and cleanup materials (b x h for each material), in pounds per month; and
 - j. the rolling, 12-month summation of individual HAPs and combined HAPs material usage and emissions from all inks, coatings, adhesives, and cleanup material, in tons.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings and inks (for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall submit deviation (excursion) reports which include the following information for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011:
 - a. an identification of each month during which the rolling, 12-month individual HAP material usage and emissions, from the use of inks, coatings, adhesives, and cleanup material in these emissions units, exceed 10.0 tons/yr based on a rolling, 12-month summation, and the actual rolling, 12-month individual HAP emissions for each such month;
 - b. an identification of each month during which the rolling, 12-month combined HAP

Emissions Unit ID: **K005**

material usage and emissions, from the use of inks, coatings, adhesives, and cleanup material in these emissions units, exceed 25.0 tons/yr based on a rolling, 12-month summation, and the actual rolling, 12-month combined HAP emissions for each such month;

- c. an identification of each month during which the rolling, 12-month VOC emissions, from the use of inks, coatings, and adhesives in these emissions unit, exceed 99.0 tons/yr based on a rolling, 12-month summation, and the actual rolling, 12-month VOC emissions for each such month;
- d. an identification of each month during which the rolling, 12-month volatile organic material usage exceeded 99.0 tons, and the actual rolling, 12-month usage; and
- e. an identification of each month during which the rolling, 12-month VOC emissions, from the use of cleanup materials in these emissions unit, exceed 0.45 ton/yr based on a rolling, 12-month summation, and the actual rolling, 12-month VOC emissions for each such month.

All deviation (excursion) reports shall be submitted in accordance with Section A.1. of the General Terms and Conditions of this permit.

- 3. As required by 40 CFR 63.830(b)(1), the permittee shall submit to the appropriate Ohio EPA District Office or local air agency an initial notification report no later than May 30, 1998, that contains the following information:
 - a. the name, title and address of the owner or operator;
 - b. the address (i.e., physical location) of the affected source;
 - c. identification of the applicable emission limitations and compliance date;
 - d. a statement of whether the affected emissions unit is located at a major source or at an area source; and
 - e. a brief description of each affected emissions unit, including the type of process operation performed.

E. Testing Requirements

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

- a. Emission Limitation:

62.88 lbs VOC/day for K005 from a combination of inks, coatings and adhesives.

Applicable Compliance Method:
This emission limitation is based upon the unit's potential to emit, which is determined by multiplying the maximum hourly line speed (ft/hr) times the maximum print/coat width (in feet) times the max ink/coating/adhesive usage rate (lbs/Msf) times the maximum VOC content (percent by weight) times 24 hours per day.

- b. Emission Limitation:

11.48 tons VOC/year for K005 from a combination of inks, coatings and adhesives, as a 12-month rolling summation.

Applicable Compliance Method:
The annual emission limitation for this emissions unit was established by multiplying the daily emission rate by 365 days of operation per year and dividing by 2000 pounds per ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the pounds per day limitation.

- c. Emission Limitation:

0.45 ton VOC/year for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 for all cleanup material, as a 12-month rolling summation.

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

- d. Emission Limitation:

99.0 tons VOC/yr for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 from a combination of inks, coatings and adhesives, as a 12-month rolling summation.

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

- e. Emission Limitation:

10.0 tons individual HAPs/yr for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 from a combination of inks, coatings, adhesives and cleanup, as a

12-month rolling summation.

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping specified in Section C.2.j.

- f. Emission Limitation:
25.0 tons combined HAPs/yr for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 from a combination of inks, coatings, adhesives and cleanup, as a 12-month rolling summation.

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping specified in Section C.2.j.

- g. Emission Limitation:
VOC content of each coating and ink not to exceed 25 percent VOC by volume of the volatile matter of the coating and ink, as applied.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section C.2. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24A shall be used to determine the VOC contents of the coatings and inks. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24A.

F. Miscellaneous Requirements

1. The requirements of this permit to install shall supercede the requirements of PTI number 13-03938 issued July 3, 2002.

Issued: To be entered upon final issuance

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>
K006 - 30 inch Wolverine Printer Singlefacer and 30 inch Post Folder Gluer (Machine 115).	OAC rule 3745-31-05(A)(3)
	OAC rule 3745-21-09(Y)(1)(a)(ii)
	40 CFR 63 Subpart KK
	OAC rule 3745-35-07(B) Synthetic Minor to avoid Title V

Wey

PTI

Emissions Unit ID: **K006**

Issued: To be entered upon final issuance

<u>Applicable Emissions Limitations/Control Measures</u>	
65.04 lbs VOC/day for K001 from a combination of inks, coatings and adhesives.	cleanup.* 99.0 tons VOC/yr for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 from a combination of inks, coatings and adhesives.*
11.87 tons VOC/year for K001 from a combination of inks, coatings and adhesives.*	* as a 12-month rolling summation See Section A.2.a
0.45 ton VOC/year for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 for all cleanup material.*	VOC content of each coating and ink not to exceed 25 percent VOC by volume of the volatile matter in the coating and ink, as applied.
* as a 12-month rolling summation	
The requirements of BAT also include compliance with the requirements of OAC rule 3745-21-09(Y)(1)(a)(ii) and 3745-35-07(B).	
See Section A.2.b.	
10.0 tons of any individual HAP/yr for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 from a combination of inks, coatings, adhesives and cleanup.*	
25.0 tons of combined HAPs/yr for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 from a combination of inks, coatings, adhesives and	

2. Additional Terms and Conditions

- 2.a** The total allowable usage and emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from the eleven sources in this permit shall not exceed 10.0 tons/year for any individual HAP and 25.0 tons/year for any combination of HAPs. VOC emissions for the eleven emissions units in this permit are restricted to 99.0 tons/year. Compliance with the above limitations shall be based upon a rolling, 12-month summation.
- 2.b** In order to comply with the requirements of 40 CFR, Part 63, Subpart KK, the permittee has chosen to comply with 40 CFR 63.820(a)(2). The combined emissions from the entire facility shall not exceed the following as a rolling, 12-month summation:
- i. Use less than 9.1 Mg (10 tons) per each rolling 12-month period of each HAP at the facility, including materials used for source categories or purposes other than printing and publishing, and
 - ii. Use less than 22.7 Mg (25 tons) per each rolling 12-month period of any combination of HAP at the facility, including materials used for source categories or purposes other than printing and publishing.
- 2.c** The daily and annual VOC emission limitations are based on the emissions unit's potential to emit. Therefore, no record keeping or reporting is required to demonstrate compliance with these limits.

B. Operational Restrictions

1. The maximum annual volatile organic material usage (from inks, coatings and adhesive) for K001 - K011 shall not exceed 99.0 tons, based upon a rolling, 12-month summation of the volatile organic material figures.

The maximum annual HAPs material usage (from inks, coatings and adhesive) for K001 - K011 shall not exceed 10.0 tons/year for any individual HAP and 25.0 tons/year for any combination of HAPs, based upon a rolling, 12-month summation of the HAPs material usage figures.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the volatile organic material usage levels specified in the following table:

Issued: To be entered upon final issuance

Month(s)	Maximum Allowable Cumulative Volatile Organic Material Usage for K001 - K011	Maximum Allowable Cumulative Individual HAPs Material Usage for K001 - K011	Maximum Allowable Cumulative Combined HAPs Material Usage for K001 - K011
1	15 tons	2.0 tons	6.0 tons
1-2	25 tons	3.0 tons	8.0 tons
1-3	35 tons	4.0 tons	10.0 tons
1-4	45 tons	5.0 tons	12.0 tons
1-5	55 tons	6.0 tons	14.0 tons
1-6	65 tons	7.0 tons	16.0 tons
1-7	75 tons	7.5 tons	18.0 tons
1-8	80 tons	8.0 tons	20.0 tons
1-9	85 tons	8.5 tons	22.0 tons
1-10	90 tons	9.0 tons	23.0 tons
1-11	95 tons	9.5 tons	24.0 tons
1-12	99.0 tons	10.0 tons	25.0 tons

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

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the VOC content of each coating and ink, in percent VOC by volume of the volatile matter in the coating and ink, as applied [calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{VOC,6}$].
2. The permittee shall collect and record the following information each month on a facility-wide basis, for emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011:
 - a. the name and identification number of each ink, coating, adhesive and cleanup material employed;
 - b. the weight, in pounds per month, of each ink, coating, adhesive and cleanup material employed, as applied;
 - c. the VOC content of each ink, coating, adhesive and cleanup material, as applied, in percent by weight;

- d. the total volatile organic material usage and VOC emissions from all inks, coatings, and adhesives (calculated by summing the records from b x c), in pounds per month;
- e. the rolling, 12-month summation of volatile organic material usage and VOC emissions from all inks, coatings, and adhesives, in tons;
- f. the total VOC emissions from all cleanup materials (b x c), in pounds per month;
- g. the rolling, 12-month summation of VOC emissions from all cleanup materials, in tons;
- h. the individual and combined HAPs contents of each ink, coating, adhesive and cleanup material, as applied, in percent by weight;
- i. the total individual and combined HAPs material usage and emissions from all inks, coatings, adhesives and cleanup materials (b x h for each material), in pounds per month; and
- j. the rolling, 12-month summation of individual HAPs and combined HAPs material usage and emissions from all inks, coatings, adhesives, and cleanup material, in tons.

D. Reporting Requirements

- 1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings and inks (for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
- 2. The permittee shall submit deviation (excursion) reports which include the following information for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011:
 - a. an identification of each month during which the rolling, 12-month individual HAP material usage and emissions, from the use of inks, coatings, adhesives, and cleanup material in these emissions units, exceed 10.0 tons/yr based on a rolling, 12-month summation, and the actual rolling, 12-month individual HAP emissions for each such month;
 - b. an identification of each month during which the rolling, 12-month combined HAP material usage and emissions, from the use of inks, coatings, adhesives, and cleanup material in these emissions units, exceed 25.0 tons/yr based on a rolling, 12-month

Issued: To be entered upon final issuance

- summation, and the actual rolling, 12-month combined HAP emissions for each such month;
- c. an identification of each month during which the rolling, 12-month VOC emissions, from the use of inks, coatings, and adhesives in these emissions unit, exceed 99.0 tons/yr based on a rolling, 12-month summation, and the actual rolling, 12-month VOC emissions for each such month;
- d. an identification of each month during which the rolling, 12-month volatile organic material usage exceeded 99.0 tons, and the actual rolling, 12-month usage; and
- e. an identification of each month during which the rolling, 12-month VOC emissions, from the use of cleanup materials in these emissions unit, exceed 0.45 ton/yr based on a rolling, 12-month summation, and the actual rolling, 12-month VOC emissions for each such month.

All deviation (excursion) reports shall be submitted in accordance with Section A.1. of the General Terms and Conditions of this permit.

3. As required by 40 CFR 63.830(b)(1), the permittee shall submit to the appropriate Ohio EPA District Office or local air agency an initial notification report no later than May 30, 1998, that contains the following information:
 - a. the name, title and address of the owner or operator;
 - b. the address (i.e., physical location) of the affected source;
 - c. identification of the applicable emission limitations and compliance date;
 - d. a statement of whether the affected emissions unit is located at a major source or at an area source; and
 - e. a brief description of each affected emissions unit, including the type of process operation performed.

E. Testing Requirements

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

a. Emission Limitation:

65.04 lbs VOC/day for K006 from a combination of inks, coatings and adhesives.

Applicable Compliance Method:

This emission limitation is based upon the unit's potential to emit, which is determined by multiplying the maximum hourly line speed (ft/hr) times the maximum print/coat width (in feet) times the max ink/coating/adhesive usage rate (lbs/Msf) times the maximum VOC content (percent by weight) times 24 hours per day.

b. Emission Limitation:

11.87 tons VOC/year for K006 from a combination of inks, coatings and adhesives, as a 12-month rolling summation.

Applicable Compliance Method:

The annual emission limitation for this emissions unit was established by multiplying the daily emission rate by 365 days of operation per year and dividing by 2000 pounds per ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the pounds per day limitation.

c. Emission Limitation:

0.45 ton VOC/year for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 for all cleanup material, as a 12-month rolling summation.

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping specified in Section C.2.g.

d. Emission Limitation:

99.0 tons VOC/yr for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 from a combination of inks, coatings and adhesives, as a 12-month rolling summation.

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping specified in Section C.2.e.

e. Emission Limitation:

10.0 tons individual HAPs/yr for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 from a combination of inks, coatings, adhesives and cleanup, as a 12-month rolling summation.

Wey

PTI

Issued: To be entered upon final issuance

Emissions Unit ID: **K006**

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping specified in Section C.2.j.

- f. Emission Limitation:
25.0 tons combined HAPs/yr for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 from a combination of inks, coatings, adhesives and cleanup, as a 12-month rolling summation.

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping specified in Section C.2.j.

- g. Emission Limitation:
VOC content of each coating and ink not to exceed 25 percent VOC by volume of the volatile matter of the coating and ink, as applied.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section C.2. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24A shall be used to determine the VOC contents of the coatings and inks. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24A.

F. Miscellaneous Requirements

1. The requirements of this permit to install shall supercede the requirements of PTI number 13-03938 issued July 3, 2002.

Wey
PTI

Emissions Unit ID: **K007**

Issued: To be entered upon final issuance

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>
K007 - 40 inch Wolverine Printer Singlefacer (Machine 116).	OAC rule 3745-31-05(A)(3)
	OAC rule 3745-21-09(Y)(1)(a)(ii)
	40 CFR 63 Subpart KK
	OAC rule 3745-35-07(B) Synthetic Minor to avoid Title V

Applicable Emissions
Limitations/Control Measures

139.68 lbs VOC/day for K001 from a combination of inks, coatings and adhesives.

25.49 tons VOC/year for K001 from a combination of inks, coatings and adhesives.*

0.45 ton VOC/year for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 for all cleanup material.*

* as a 12-month rolling summation

The requirements of BAT also include compliance with the requirements of OAC rule 3745-21-09(Y)(1)(a)(ii) and 3745-35-07(B).

See Section A.2.b.

10.0 tons of any individual HAP/yr for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 from a combination of inks, coatings, adhesives and cleanup.*

25.0 tons of combined HAPs/yr for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 from a combination of inks, coatings, adhesives and cleanup.*

99.0 tons VOC/yr for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 from a combination of inks, coatings and adhesives.*

* as a 12-month rolling summation

See Section A.2.a

VOC content of each coating and ink not to exceed 25 percent VOC by volume of the volatile matter in the coating and ink, as applied.

Issued: To be entered upon final issuance

2. Additional Terms and Conditions

2.a The total allowable usage and emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from the eleven sources in this permit shall not exceed 10.0 tons/year for any individual HAP and 25.0 tons/year for any combination of HAPs. VOC emissions for the eleven emissions units in this permit are restricted to 99.0 tons/year. Compliance with the above limitations shall be based upon a rolling, 12-month summation.

2.b In order to comply with the requirements of 40 CFR, Part 63, Subpart KK, the permittee has chosen to comply with 40 CFR 63.820(a)(2). The combined emissions from the entire facility shall not exceed the following as a rolling, 12-month summation:

- i. Use less than 9.1 Mg (10 tons) per each rolling 12-month period of each HAP at the facility, including materials used for source categories or purposes other than printing and publishing, and
- ii. Use less than 22.7 Mg (25 tons) per each rolling 12-month period of any combination of HAP at the facility, including materials used for source categories or purposes other than printing and publishing.

2.c The daily and annual VOC emission limitations are based on the emissions unit's potential to emit. Therefore, no record keeping or reporting is required to demonstrate compliance with these limits.

B. Operational Restrictions

- 1. The maximum annual volatile organic material usage (from inks, coatings and adhesive) for K001 - K011 shall not exceed 99.0 tons, based upon a rolling, 12-month summation of the volatile organic material figures.

The maximum annual HAPs material usage (from inks, coatings and adhesive) for K001 - K011 shall not exceed 10.0 tons/year for any individual HAP and 25.0 tons/year for any combination of HAPs, based upon a rolling, 12-month summation of the HAPs material usage figures.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the volatile organic material usage levels specified in the following table:

Month(s)

Issued: To be entered upon final issuance

	Maximum Allowable Cumulative Volatile Organic Material Usage for K001 - K011	Maximum Allowable Cumulative Individual HAPs Material Usage for K001 - K011	Maximum Allowable Cumulative Combined HAPs Material Usage for K001 - K011
1	15 tons	2.0 tons	6.0 tons
1-2	25 tons	3.0 tons	8.0 tons
1-3	35 tons	4.0 tons	10.0 tons
1-4	45 tons	5.0 tons	12.0 tons
1-5	55 tons	6.0 tons	14.0 tons
1-6	65 tons	7.0 tons	16.0 tons
1-7	75 tons	7.5 tons	18.0 tons
1-8	80 tons	8.0 tons	20.0 tons
1-9	85 tons	8.5 tons	22.0 tons
1-10	90 tons	9.0 tons	23.0 tons
1-11	95 tons	9.5 tons	24.0 tons
1-12	99.0 tons	10.0 tons	25.0 tons

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

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the VOC content of each coating and ink, in percent VOC by volume of the volatile matter in the coating and ink, as applied [calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{VOC,6}$].
2. The permittee shall collect and record the following information each month on a facility-wide basis, for emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011:
 - a. the name and identification number of each ink, coating, adhesive and cleanup material employed;
 - b. the weight, in pounds per month, of each ink, coating, adhesive and cleanup material employed, as applied;
 - c. the VOC content of each ink, coating, adhesive and cleanup material, as applied, in percent by weight;

- d. the total volatile organic material usage and VOC emissions from all inks, coatings, and adhesives (calculated by summing the records from b x c), in pounds per month;
- e. the rolling, 12-month summation of volatile organic material usage and VOC emissions from all inks, coatings, and adhesives, in tons;
- f. the total VOC emissions from all cleanup materials (b x c), in pounds per month;
- g. the rolling, 12-month summation of VOC emissions from all cleanup materials, in tons;
- h. the individual and combined HAPs contents of each ink, coating, adhesive and cleanup material, as applied, in percent by weight;
- i. the total individual and combined HAPs material usage and emissions from all inks, coatings, adhesives and cleanup materials (b x h for each material), in pounds per month; and
- j. the rolling, 12-month summation of individual HAPs and combined HAPs material usage and emissions from all inks, coatings, adhesives, and cleanup material, in tons.

D. Reporting Requirements

- 1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings and inks (for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
- 2. The permittee shall submit deviation (excursion) reports which include the following information for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011:
 - a. an identification of each month during which the rolling, 12-month individual HAP material usage and emissions, from the use of inks, coatings, adhesives, and cleanup material in these emissions units, exceed 10.0 tons/yr based on a rolling, 12-month summation, and the actual rolling, 12-month individual HAP emissions for each such month;
 - b. an identification of each month during which the rolling, 12-month combined HAP material usage and emissions, from the use of inks, coatings, adhesives, and cleanup material in these emissions units, exceed 25.0 tons/yr based on a rolling, 12-month

Issued: To be entered upon final issuance

- summation, and the actual rolling, 12-month combined HAP emissions for each such month;
- c. an identification of each month during which the rolling, 12-month VOC emissions, from the use of inks, coatings, and adhesives in these emissions unit, exceed 99.0 tons/yr based on a rolling, 12-month summation, and the actual rolling, 12-month VOC emissions for each such month;
- d. an identification of each month during which the rolling, 12-month volatile organic material usage exceeded 99.0 tons, and the actual rolling, 12-month usage; and
- e. an identification of each month during which the rolling, 12-month VOC emissions, from the use of cleanup materials in these emissions unit, exceed 0.45 ton/yr based on a rolling, 12-month summation, and the actual rolling, 12-month VOC emissions for each such month.

All deviation (excursion) reports shall be submitted in accordance with Section A.1. of the General Terms and Conditions of this permit.

3. As required by 40 CFR 63.830(b)(1), the permittee shall submit to the appropriate Ohio EPA District Office or local air agency an initial notification report no later than May 30, 1998, that contains the following information:
 - a. the name, title and address of the owner or operator;
 - b. the address (i.e., physical location) of the affected source;
 - c. identification of the applicable emission limitations and compliance date;
 - d. a statement of whether the affected emissions unit is located at a major source or at an area source; and
 - e. a brief description of each affected emissions unit, including the type of process operation performed.

E. Testing Requirements

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

a. Emission Limitation:

139.68 lbs VOC/day for K007 from a combination of inks, coatings and adhesives.

Applicable Compliance Method:

This emission limitation is based upon the unit's potential to emit, which is determined by multiplying the maximum hourly line speed (ft/hr) times the maximum print/coat width (in feet) times the max ink/coating/adhesive usage rate (lbs/Msf) times the maximum VOC content (percent by weight) times 24 hours per day.

b. Emission Limitation:

25.49 tons VOC/year for K007 from a combination of inks, coatings and adhesives, as a 12-month rolling summation.

Applicable Compliance Method:

The annual emission limitation for this emissions unit was established by multiplying the daily emission rate by 365 days of operation per year and dividing by 2000 pounds per ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the pounds per day limitation.

c. Emission Limitation:

0.45 ton VOC/year for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 for all cleanup material, as a 12-month rolling summation.

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping specified in Section C.2.g.

d. Emission Limitation:

99.0 tons VOC/yr for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 from a combination of inks, coatings and adhesives, as a 12-month rolling summation.

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping specified in Section C.2.e.

e. Emission Limitation:

10.0 tons individual HAPs/yr for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 from a combination of inks, coatings, adhesives and cleanup, as a 12-month rolling summation.

Wey

PTI

Issued: To be entered upon final issuance

Emissions Unit ID: **K007**

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping specified in Section C.2.j.

- f. Emission Limitation:
25.0 tons combined HAPs/yr for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 from a combination of inks, coatings, adhesives and cleanup, as a 12-month rolling summation.

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping specified in Section C.2.j.

- g. Emission Limitation:
VOC content of each coating and ink not to exceed 25 percent VOC by volume of the volatile matter of the coating and ink, as applied.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section C.2. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24A shall be used to determine the VOC contents of the coatings and inks. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24A.

F. Miscellaneous Requirements

1. The requirements of this permit to install shall supercede the requirements of PTI number 13-03938 issued July 3, 2002.

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>
K008 - 40 inch Wolverine Printer Singlefacer (Machine 114).	OAC rule 3745-31-05(A)(3)
	OAC rule 3745-21-09(Y)(1)(a)(ii)
	40 CFR 63 Subpart KK
	OAC rule 3745-35-07(B) Synthetic Minor to avoid Title V

Wey

PTI

Issued: To be entered upon final issuance

Emissions Unit ID: **K008**

<u>Applicable Emissions Limitations/Control Measures</u>	
139.68 lbs VOC/day for K001 from a combination of inks, coatings and adhesives.	99.0 tons VOC/yr for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 from a combination of inks, coatings and adhesives.*
25.49 tons VOC/year for K001 from a combination of inks, coatings and adhesives.*	* as a 12-month rolling summation
0.45 ton VOC/year for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 for all cleanup material.*	See Section A.2.a
* as a 12-month rolling summation	VOC content of each coating and ink not to exceed 25 percent VOC by volume of the volatile matter in the coating and ink, as applied.
The requirements of BAT also include compliance with the requirements of OAC rule 3745-21-09(Y)(1)(a)(ii) and 3745-35-07(B).	
See Section A.2.b.	
10.0 tons of any individual HAP/yr for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 from a combination of inks, coatings, adhesives and cleanup.*	
25.0 tons of combined HAPs/yr for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 from a combination of inks, coatings, adhesives and cleanup.*	

Issued: To be entered upon final issuance

2. Additional Terms and Conditions

2.a The total allowable usage and emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from the eleven sources in this permit shall not exceed 10.0 tons/year for any individual HAP and 25.0 tons/year for any combination of HAPs. VOC emissions for the eleven emissions units in this permit are restricted to 99.0 tons/year. Compliance with the above limitations shall be based upon a rolling, 12-month summation.

2.b In order to comply with the requirements of 40 CFR, Part 63, Subpart KK, the permittee has chosen to comply with 40 CFR 63.820(a)(2). The combined emissions from the entire facility shall not exceed the following as a rolling, 12-month summation:

- i. Use less than 9.1 Mg (10 tons) per each rolling 12-month period of each HAP at the facility, including materials used for source categories or purposes other than printing and publishing, and
- ii. Use less than 22.7 Mg (25 tons) per each rolling 12-month period of any combination of HAP at the facility, including materials used for source categories or purposes other than printing and publishing.

2.c The daily and annual VOC emission limitations are based on the emissions unit's potential to emit. Therefore, no record keeping or reporting is required to demonstrate compliance with these limits.

B. Operational Restrictions

1. The maximum annual volatile organic material usage (from inks, coatings and adhesive) for K001 - K011 shall not exceed 99.0 tons, based upon a rolling, 12-month summation of the volatile organic material figures.

The maximum annual HAPs material usage (from inks, coatings and adhesive) for K001 - K011 shall not exceed 10.0 tons/year for any individual HAP and 25.0 tons/year for any combination of HAPs, based upon a rolling, 12-month summation of the HAPs material usage figures.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the volatile organic material usage levels specified in the following table:

Month(s)

	Maximum Allowable Cumulative Volatile Organic Material Usage for K001 - K011	Maximum Allowable Cumulative Individual HAPs Material Usage for K001 - K011	Maximum Allowable Cumulative Combined HAPs Material Usage for K001 - K011
1	15 tons	2.0 tons	6.0 tons
1-2	25 tons	3.0 tons	8.0 tons
1-3	35 tons	4.0 tons	10.0 tons
1-4	45 tons	5.0 tons	12.0 tons
1-5	55 tons	6.0 tons	14.0 tons
1-6	65 tons	7.0 tons	16.0 tons
1-7	75 tons	7.5 tons	18.0 tons
1-8	80 tons	8.0 tons	20.0 tons
1-9	85 tons	8.5 tons	22.0 tons
1-10	90 tons	9.0 tons	23.0 tons
1-11	95 tons	9.5 tons	24.0 tons
1-12	99.0 tons	10.0 tons	25.0 tons

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

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the VOC content of each coating and ink, in percent VOC by volume of the volatile matter in the coating and ink, as applied [calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{VOC,6}$].
2. The permittee shall collect and record the following information each month on a facility-wide basis, for emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011:
 - a. the name and identification number of each ink, coating, adhesive and cleanup material employed;
 - b. the weight, in pounds per month, of each ink, coating, adhesive and cleanup material employed, as applied;
 - c. the VOC content of each ink, coating, adhesive and cleanup material, as applied, in percent by weight;

Issued: To be entered upon final issuance

- d. the total volatile organic material usage and VOC emissions from all inks, coatings, and adhesives (calculated by summing the records from b x c), in pounds per month;
- e. the rolling, 12-month summation of volatile organic material usage and VOC emissions from all inks, coatings, and adhesives, in tons;
- f. the total VOC emissions from all cleanup materials (b x c), in pounds per month;
- g. the rolling, 12-month summation of VOC emissions from all cleanup materials, in tons;
- h. the individual and combined HAPs contents of each ink, coating, adhesive and cleanup material, as applied, in percent by weight;
- i. the total individual and combined HAPs material usage and emissions from all inks, coatings, adhesives and cleanup materials (b x h for each material), in pounds per month; and
- j. the rolling, 12-month summation of individual HAPs and combined HAPs material usage and emissions from all inks, coatings, adhesives, and cleanup material, in tons.

D. Reporting Requirements

- 1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings and inks (for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
- 2. The permittee shall submit deviation (excursion) reports which include the following information for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011:
 - a. an identification of each month during which the rolling, 12-month individual HAP material usage and emissions, from the use of inks, coatings, adhesives, and cleanup material in these emissions units, exceed 10.0 tons/yr based on a rolling, 12-month summation, and the actual rolling, 12-month individual HAP emissions for each such month;
 - b. an identification of each month during which the rolling, 12-month combined HAP material usage and emissions, from the use of inks, coatings, adhesives, and cleanup material in these emissions units, exceed 25.0 tons/yr based on a rolling, 12-month

Issued: To be entered upon final issuance

- summation, and the actual rolling, 12-month combined HAP emissions for each such month;
- c. an identification of each month during which the rolling, 12-month VOC emissions, from the use of inks, coatings, and adhesives in these emissions unit, exceed 99.0 tons/yr based on a rolling, 12-month summation, and the actual rolling, 12-month VOC emissions for each such month;
- d. an identification of each month during which the rolling, 12-month volatile organic material usage exceeded 99.0 tons, and the actual rolling, 12-month usage; and
- e. an identification of each month during which the rolling, 12-month VOC emissions, from the use of cleanup materials in these emissions unit, exceed 0.45 ton/yr based on a rolling, 12-month summation, and the actual rolling, 12-month VOC emissions for each such month.

All deviation (excursion) reports shall be submitted in accordance with Section A.1. of the General Terms and Conditions of this permit.

3. As required by 40 CFR 63.830(b)(1), the permittee shall submit to the appropriate Ohio EPA District Office or local air agency an initial notification report no later than May 30, 1998, that contains the following information:
 - a. the name, title and address of the owner or operator;
 - b. the address (i.e., physical location) of the affected source;
 - c. identification of the applicable emission limitations and compliance date;
 - d. a statement of whether the affected emissions unit is located at a major source or at an area source; and
 - e. a brief description of each affected emissions unit, including the type of process operation performed.

E. Testing Requirements

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

a. Emission Limitation:

139.68 lbs VOC/day for K008 from a combination of inks, coatings and adhesives.

Applicable Compliance Method:

This emission limitation is based upon the unit's potential to emit, which is determined by multiplying the maximum hourly line speed (ft/hr) times the maximum print/coat width (in feet) times the max ink/coating/adhesive usage rate (lbs/Msf) times the maximum VOC content (percent by weight) times 24 hours per day.

b. Emission Limitation:

25.49 tons VOC/year for K008 from a combination of inks, coatings and adhesives, as a 12-month rolling summation.

Applicable Compliance Method:

The annual emission limitation for this emissions unit was established by multiplying the daily emission rate by 365 days of operation per year and dividing by 2000 pounds per ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the pounds per day limitation.

c. Emission Limitation:

0.45 ton VOC/year for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 for all cleanup material, as a 12-month rolling summation.

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping specified in Section C.2.g.

d. Emission Limitation:

99.0 tons VOC/yr for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 from a combination of inks, coatings and adhesives, as a 12-month rolling summation.

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping specified in Section C.2.e.

e. Emission Limitation:

10.0 tons individual HAPs/yr for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 from a combination of inks, coatings, adhesives and cleanup, as a 12-month rolling summation.

Wey

PTI

Issued: To be entered upon final issuance

Emissions Unit ID: **K008**

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping specified in Section C.2.j.

- f. Emission Limitation:
25.0 tons combined HAPs/yr for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 from a combination of inks, coatings, adhesives and cleanup, as a 12-month rolling summation.

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping specified in Section C.2.j.

- g. Emission Limitation:
VOC content of each coating and ink not to exceed 25 percent VOC by volume of the volatile matter of the coating and ink, as applied.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section C.2. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24A shall be used to determine the VOC contents of the coatings and inks. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24A.

F. Miscellaneous Requirements

1. The requirements of this permit to install shall supercede the requirements of PTI number 13-03938 issued July 3, 2002.

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>
K009 - 40 inch Wolverine Printer Singlefacer (Machine 117).	OAC rule 3745-31-05(A)(3)
	OAC rule 3745-21-09(Y)(1)(a)(ii)
	40 CFR 63 Subpart KK
	OAC rule 3745-35-07(B) Synthetic Minor to avoid Title V

Wey

PTI

Issued: To be entered upon final issuance

Emissions Unit ID: **K009**

Applicable Emissions
Limitations/Control Measures

144.24 lbs VOC/day for K001 from a combination of inks, coatings and adhesives.

26.32 tons VOC/year for K001 from a combination of inks, coatings and adhesives.*

0.45 ton VOC/year for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 for all cleanup material.*

* as a 12-month rolling summation

The requirements of BAT also include compliance with the requirements of OAC rule 3745-21-09(Y)(1)(a)(ii) and 3745-35-07(B).

See Section A.2.b.

10.0 tons of any individual HAPs/yr for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 from a combination of inks, coatings, adhesives and cleanup.*

25.0 tons of combined HAPs/yr for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 from a combination of inks, coatings, adhesives and cleanup.*

99.0 tons VOC/yr for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 from a combination of inks, coatings and adhesives.*

* as a 12-month rolling summation

See Section A.2.a

VOC content of each coating and ink not to exceed 25 percent VOC by volume of the volatile matter in the coating and ink, as applied.

Issued: To be entered upon final issuance

2. Additional Terms and Conditions

2.a The total allowable usage and emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from the eleven sources in this permit shall not exceed 10.0 tons/year for any individual HAP and 25.0 tons/year for any combination of HAPs. VOC emissions for the eleven emissions units in this permit are restricted to 99.0 tons/year. Compliance with the above limitations shall be based upon a rolling, 12-month summation.

2.b In order to comply with the requirements of 40 CFR, Part 63, Subpart KK, the permittee has chosen to comply with 40 CFR 63.820(a)(2). The combined emissions from the entire facility shall not exceed the following as a rolling, 12-month summation:

- i. Use less than 9.1 Mg (10 tons) per each rolling 12-month period of each HAP at the facility, including materials used for source categories or purposes other than printing and publishing, and
- ii. Use less than 22.7 Mg (25 tons) per each rolling 12-month period of any combination of HAP at the facility, including materials used for source categories or purposes other than printing and publishing.

2.c The daily and annual VOC emission limitations are based on the emissions unit's potential to emit. Therefore, no record keeping or reporting is required to demonstrate compliance with these limits.

B. Operational Restrictions

- 1. The maximum annual volatile organic material usage (from inks, coatings and adhesive) for K001 - K011 shall not exceed 99.0 tons, based upon a rolling, 12-month summation of the volatile organic material figures.

The maximum annual HAPs material usage (from inks, coatings and adhesive) for K001 - K011 shall not exceed 10.0 tons/year for any individual HAP and 25.0 tons/year for any combination of HAPs, based upon a rolling, 12-month summation of the HAPs material usage figures.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the volatile organic material usage levels specified in the following table:

Month(s)

	Maximum Allowable Cumulative Volatile Organic Material Usage for K001 - K011	Maximum Allowable Cumulative Individual HAPs Material Usage for K001 - K011	Maximum Allowable Cumulative Combined HAPs Material Usage for K001 - K011
1	15 tons	2.0 tons	6.0 tons
1-2	25 tons	3.0 tons	8.0 tons
1-3	35 tons	4.0 tons	10.0 tons
1-4	45 tons	5.0 tons	12.0 tons
1-5	55 tons	6.0 tons	14.0 tons
1-6	65 tons	7.0 tons	16.0 tons
1-7	75 tons	7.5 tons	18.0 tons
1-8	80 tons	8.0 tons	20.0 tons
1-9	85 tons	8.5 tons	22.0 tons
1-10	90 tons	9.0 tons	23.0 tons
1-11	95 tons	9.5 tons	24.0 tons
1-12	99.0 tons	10.0 tons	25.0 tons

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

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the VOC content of each coating and ink, in percent VOC by volume of the volatile matter in the coating and ink, as applied [calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{VOC,6}$].
2. The permittee shall collect and record the following information each month on a facility-wide basis, for emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011:
 - a. the name and identification number of each ink, coating, adhesive and cleanup material employed;
 - b. the weight, in pounds per month, of each ink, coating, adhesive and cleanup material employed, as applied;
 - c. the VOC content of each ink, coating, adhesive and cleanup material, as applied, in percent by weight;

Issued: To be entered upon final issuance

- d. the total volatile organic material usage and VOC emissions from all inks, coatings, and adhesives (calculated by summing the records from b x c), in pounds per month;
- e. the rolling, 12-month summation of volatile organic material usage and VOC emissions from all inks, coatings, and adhesives, in tons;
- f. the total VOC emissions from all cleanup materials (b x c), in pounds per month;
- g. the rolling, 12-month summation of VOC emissions from all cleanup materials, in tons;
- h. the individual and combined HAPs contents of each ink, coating, adhesive and cleanup material, as applied, in percent by weight;
- i. the total individual and combined HAPs material usage and emissions from all inks, coatings, adhesives and cleanup materials (b x h for each material), in pounds per month; and
- j. the rolling, 12-month summation of individual HAPs and combined HAPs material usage and emissions from all inks, coatings, adhesives, and cleanup material, in tons.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings and inks (for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall submit deviation (excursion) reports which include the following information for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011:
 - a. an identification of each month during which the rolling, 12-month individual HAP material usage and emissions, from the use of inks, coatings, adhesives, and cleanup material in these emissions units, exceed 10.0 tons/yr based on a rolling, 12-month summation, and the actual rolling, 12-month individual HAP emissions for each such month;
 - b. an identification of each month during which the rolling, 12-month combined HAP material usage and emissions, from the use of inks, coatings, adhesives, and cleanup material in these emissions units, exceed 25.0 tons/yr based on a rolling, 12-month

Issued: To be entered upon final issuance

- summation, and the actual rolling, 12-month combined HAP emissions for each such month;
- c. an identification of each month during which the rolling, 12-month VOC emissions, from the use of inks, coatings, and adhesives in these emissions unit, exceed 99.0 tons/yr based on a rolling, 12-month summation, and the actual rolling, 12-month VOC emissions for each such month;
- d. an identification of each month during which the rolling, 12-month volatile organic material usage exceeded 99.0 tons, and the actual rolling, 12-month usage; and
- e. an identification of each month during which the rolling, 12-month VOC emissions, from the use of cleanup materials in these emissions unit, exceed 0.45 ton/yr based on a rolling, 12-month summation, and the actual rolling, 12-month VOC emissions for each such month.

All deviation (excursion) reports shall be submitted in accordance with Section A.1. of the General Terms and Conditions of this permit.

3. As required by 40 CFR 63.830(b)(1), the permittee shall submit to the appropriate Ohio EPA District Office or local air agency an initial notification report no later than May 30, 1998, that contains the following information:
 - a. the name, title and address of the owner or operator;
 - b. the address (i.e., physical location) of the affected source;
 - c. identification of the applicable emission limitations and compliance date;
 - d. a statement of whether the affected emissions unit is located at a major source or at an area source; and
 - e. a brief description of each affected emissions unit, including the type of process operation performed.

E. Testing Requirements

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

a. Emission Limitation:

144.24 lbs VOC/day for K009 from a combination of inks, coatings and adhesives.

Applicable Compliance Method:

This emission limitation is based upon the unit's potential to emit, which is determined by multiplying the maximum hourly line speed (ft/hr) times the maximum print/coat width (in feet) times the max ink/coating/adhesive usage rate (lbs/Msf) times the maximum VOC content (percent by weight) times 24 hours per day.

b. Emission Limitation:

26.32 tons VOC/year for K009 from a combination of inks, coatings and adhesives, as a 12-month rolling summation.

Applicable Compliance Method:

The annual emission limitation for this emissions unit was established by multiplying the daily emission rate by 365 days of operation per year and dividing by 2000 pounds per ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the pounds per day limitation.

c. Emission Limitation:

0.45 ton VOC/year for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 for all cleanup material, as a 12-month rolling summation.

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping specified in Section C.2.g.

d. Emission Limitation:

99.0 tons VOC/yr for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 from a combination of inks, coatings and adhesives, as a 12-month rolling summation.

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping specified in Section C.2.e.

e. Emission Limitation:

10.0 tons individual HAPs/yr for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 from a combination of inks, coatings, adhesives and cleanup, as a 12-month rolling summation.

Wey

PTI

Issued: To be entered upon final issuance

Emissions Unit ID: **K009**

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping specified in Section C.2.j.

- f. Emission Limitation:
25.0 tons combined HAPs/yr for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 from a combination of inks, coatings, adhesives and cleanup, as a 12-month rolling summation.

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping specified in Section C.2.j.

- g. Emission Limitation:
VOC content of each coating and ink not to exceed 25 percent VOC by volume of the volatile matter of the coating and ink, as applied.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section C.2. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24A shall be used to determine the VOC contents of the coatings and inks. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24A.

F. Miscellaneous Requirements

1. The requirements of this permit to install shall supercede the requirements of PTI number 13-03938 issued July 3, 2002.

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>
K010 - 40 inch Wolverine Printer Singlefacer (Machine 118).	OAC rule 3745-31-05(A)(3)
	OAC rule 3745-21-09(Y)(1)(a)(ii)
	40 CFR 63 Subpart KK
	OAC rule 3745-35-07(B) Synthetic Minor to avoid Title V

Wey

PTI

Issued: To be entered upon final issuance

Emissions Unit ID: **K010**

Applicable Emissions Limitations/Control Measures	99.0 tons VOC/yr for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 from a combination of inks, coatings and adhesives.*
139.68 lbs VOC/day for K001 from a combination of inks, coatings and adhesives.	* as a 12-month rolling summation
25.49 tons VOC/year for K001 from a combination of inks, coatings and adhesives.*	See Section A.2.a
0.45 ton VOC/year for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 for all cleanup material.*	VOC content of each coating and ink not to exceed 25 percent VOC by volume of the volatile matter in the coating and ink, as applied.
* as a 12-month rolling summation	
The requirements of BAT also include compliance with the requirements of OAC rule 3745-21-09(Y)(1)(a)(ii) and 3745-35-07(B).	
See Section A.2.b.	
10.0 tons of any individual HAP/yr for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 from a combination of inks, coatings, adhesives and cleanup.*	
25.0 tons of combined HAPs/yr for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 from a combination of inks, coatings, adhesives and cleanup.*	

Issued: To be entered upon final issuance

2. Additional Terms and Conditions

2.a The total allowable usage and emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from the eleven sources in this permit shall not exceed 10.0 tons/year for any individual HAP and 25.0 tons/year for any combination of HAPs. VOC emissions for the eleven emissions units in this permit are restricted to 99.0 tons/year. Compliance with the above limitations shall be based upon a rolling, 12-month summation.

2.b In order to comply with the requirements of 40 CFR, Part 63, Subpart KK, the permittee has chosen to comply with 40 CFR 63.820(a)(2). The combined emissions from the entire facility shall not exceed the following as a rolling, 12-month summation:

- i. Use less than 9.1 Mg (10 tons) per each rolling 12-month period of each HAP at the facility, including materials used for source categories or purposes other than printing and publishing, and
- ii. Use less than 22.7 Mg (25 tons) per each rolling 12-month period of any combination of HAP at the facility, including materials used for source categories or purposes other than printing and publishing.

2.c The daily and annual VOC emission limitations are based on the emissions unit's potential to emit. Therefore, no record keeping or reporting is required to demonstrate compliance with these limits.

B. Operational Restrictions

1. The maximum annual volatile organic material usage (from inks, coatings and adhesive) for K001 - K011 shall not exceed 99.0 tons, based upon a rolling, 12-month summation of the volatile organic material figures.

The maximum annual HAPs material usage (from inks, coatings and adhesive) for K001 - K011 shall not exceed 10.0 tons/year for any individual HAP and 25.0 tons/year for any combination of HAPs, based upon a rolling, 12-month summation of the HAPs material usage figures.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the volatile organic material usage levels specified in the following table:

Month(s)

	Maximum Allowable Cumulative Volatile Organic Material Usage for K001 - K011	Maximum Allowable Cumulative Individual HAPs Material Usage for K001 - K011	Maximum Allowable Cumulative Combined HAPs Material Usage for K001 - K011
1	15 tons	2.0 tons	6.0 tons
1-2	25 tons	3.0 tons	8.0 tons
1-3	35 tons	4.0 tons	10.0 tons
1-4	45 tons	5.0 tons	12.0 tons
1-5	55 tons	6.0 tons	14.0 tons
1-6	65 tons	7.0 tons	16.0 tons
1-7	75 tons	7.5 tons	18.0 tons
1-8	80 tons	8.0 tons	20.0 tons
1-9	85 tons	8.5 tons	22.0 tons
1-10	90 tons	9.0 tons	23.0 tons
1-11	95 tons	9.5 tons	24.0 tons
1-12	99.0 tons	10.0 tons	25.0 tons

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

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the VOC content of each coating and ink, in percent VOC by volume of the volatile matter in the coating and ink, as applied [calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{VOC,6}$].
2. The permittee shall collect and record the following information each month on a facility-wide basis, for emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011:
 - a. the name and identification number of each ink, coating, adhesive and cleanup material employed;
 - b. the weight, in pounds per month, of each ink, coating, adhesive and cleanup material employed, as applied;
 - c. the VOC content of each ink, coating, adhesive and cleanup material, as applied, in percent by weight;

Issued: To be entered upon final issuance

- d. the total volatile organic material usage and VOC emissions from all inks, coatings, and adhesives (calculated by summing the records from b x c), in pounds per month;
- e. the rolling, 12-month summation of volatile organic material usage and VOC emissions from all inks, coatings, and adhesives, in tons;
- f. the total VOC emissions from all cleanup materials (b x c), in pounds per month;
- g. the rolling, 12-month summation of VOC emissions from all cleanup materials, in tons;
- h. the individual and combined HAPs contents of each ink, coating, adhesive and cleanup material, as applied, in percent by weight;
- i. the total individual and combined HAPs material usage and emissions from all inks, coatings, adhesives and cleanup materials (b x h for each material), in pounds per month; and
- j. the rolling, 12-month summation of individual HAPs and combined HAPs material usage and emissions from all inks, coatings, adhesives, and cleanup material, in tons.

D. Reporting Requirements

- 1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings and inks (for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
- 2. The permittee shall submit deviation (excursion) reports which include the following information for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011:
 - a. an identification of each month during which the rolling, 12-month individual HAP material usage and emissions, from the use of inks, coatings, adhesives, and cleanup material in these emissions units, exceed 10.0 tons/yr based on a rolling, 12-month summation, and the actual rolling, 12-month individual HAP emissions for each such month;
 - b. an identification of each month during which the rolling, 12-month combined HAP material usage and emissions, from the use of inks, coatings, adhesives, and cleanup material in these emissions units, exceed 25.0 tons/yr based on a rolling, 12-month

summation, and the actual rolling, 12-month combined HAP emissions for each such month;

- c. an identification of each month during which the rolling, 12-month VOC emissions, from the use of inks, coatings, and adhesives in these emissions unit, exceed 99.0 tons/yr based on a rolling, 12-month summation, and the actual rolling, 12-month VOC emissions for each such month;
- d. an identification of each month during which the rolling, 12-month volatile organic material usage exceeded 99.0 tons, and the actual rolling, 12-month usage; and
- e. an identification of each month during which the rolling, 12-month VOC emissions, from the use of cleanup materials in these emissions unit, exceed 0.45 ton/yr based on a rolling, 12-month summation, and the actual rolling, 12-month VOC emissions for each such month.

All deviation (excursion) reports shall be submitted in accordance with Section A.1. of the General Terms and Conditions of this permit.

3. As required by 40 CFR 63.830(b)(1), the permittee shall submit to the appropriate Ohio EPA District Office or local air agency an initial notification report no later than May 30, 1998, that contains the following information:
 - a. the name, title and address of the owner or operator;
 - b. the address (i.e., physical location) of the affected source;
 - c. identification of the applicable emission limitations and compliance date;
 - d. a statement of whether the affected emissions unit is located at a major source or at an area source; and
 - e. a brief description of each affected emissions unit, including the type of process operation performed.

E. Testing Requirements

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

Issued: To be entered upon final issuance

- a. Emission Limitation:

139.68 lbs VOC/day for K010 from a combination of inks, coatings and adhesives.

Applicable Compliance Method:
This emission limitation is based upon the unit's potential to emit, which is determined by multiplying the maximum hourly line speed (ft/hr) times the maximum print/coat width (in feet) times the max ink/coating/adhesive usage rate (lbs/Msf) times the maximum VOC content (percent by weight) times 24 hours per day.
- b. Emission Limitation:

25.49 tons VOC/year for K010 from a combination of inks, coatings and adhesives, as a 12-month rolling summation.

Applicable Compliance Method:
The annual emission limitation for this emissions unit was established by multiplying the daily emission rate by 365 days of operation per year and dividing by 2000 pounds per ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the pounds per day limitation.
- c. Emission Limitation:

0.45 ton VOC/year for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 for all cleanup material, as a 12-month rolling summation.

Applicable Compliance Method:
Compliance shall be determined based upon the record keeping specified in Section C.2.g.
- d. Emission Limitation:

99.0 tons VOC/yr for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 from a combination of inks, coatings and adhesives, as a 12-month rolling summation.

Applicable Compliance Method:
Compliance shall be determined based upon the record keeping specified in Section C.2.e.
- e. Emission Limitation:

10.0 tons individual HAPs/yr for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 from a combination of inks, coatings, adhesives and cleanup, as a 12-month rolling summation.

Wey

PTI

Issued: To be entered upon final issuance

Emissions Unit ID: **K010**

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping specified in Section C.2.j.

- f. Emission Limitation:
25.0 tons combined HAPs/yr for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 from a combination of inks, coatings, adhesives and cleanup, as a 12-month rolling summation.

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping specified in Section C.2.j.

- g. Emission Limitation:
VOC content of each coating and ink not to exceed 25 percent VOC by volume of the volatile matter of the coating and ink, as applied.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section C.2. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24A shall be used to determine the VOC contents of the coatings and inks. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24A.

F. Miscellaneous Requirements

1. The requirements of this permit to install shall supercede the requirements of PTI number 13-03938 issued July 3, 2002.

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>
K011 - 60 inch Wolverine Printer Singlefacer (Machine 119).	OAC rule 3745-31-05(A)(3)
	OAC rule 3745-21-09(Y)(1)(a)(ii)
	40 CFR 63 Subpart KK
	OAC rule 3745-35-07(B) Synthetic Minor to avoid Title V

Wey

PTI

Issued: To be entered upon final issuance

Emissions Unit ID: **K011**

Applicable Emissions <u>Limitations/Control Measures</u>	99.0 tons VOC/yr for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 from a combination of inks, coatings and adhesives.*
129.12 lbs VOC/day for K001 from a combination of inks, coatings and adhesives.	* as a 12-month rolling summation
23.56 tons VOC/year for K001 from a combination of inks, coatings and adhesives.*	See Section A.2.a
0.45 ton VOC/year for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 for all cleanup material.*	VOC content of each coating and ink not to exceed 25 percent VOC by volume of the volatile matter in the coating and ink, as applied.
* as a 12-month rolling summation	
The requirements of BAT also include compliance with the requirements of OAC rule 3745-21-09(Y)(1)(a)(ii) and 3745-35-07(B).	
See Section A.2.b.	
10.0 tons of any individual HAP/yr for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 from a combination of inks, coatings, adhesives and cleanup.*	
25.0 tons of combined HAPs/yr for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 from a combination of inks, coatings, adhesives and cleanup.*	

Issued: To be entered upon final issuance

2. Additional Terms and Conditions

2.a The total allowable usage and emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from the eleven sources in this permit shall not exceed 10.0 tons/year for any individual HAP and 25.0 tons/year for any combination of HAPs. VOC emissions for the eleven emissions units in this permit are restricted to 99.0 tons/year. Compliance with the above limitations shall be based upon a rolling, 12-month summation.

2.b In order to comply with the requirements of 40 CFR, Part 63, Subpart KK, the permittee has chosen to comply with 40 CFR 63.820(a)(2). The combined emissions from the entire facility shall not exceed the following as a rolling, 12-month summation:

- i. Use less than 9.1 Mg (10 tons) per each rolling 12-month period of each HAP at the facility, including materials used for source categories or purposes other than printing and publishing, and
- ii. Use less than 22.7 Mg (25 tons) per each rolling 12-month period of any combination of HAP at the facility, including materials used for source categories or purposes other than printing and publishing.

2.c The daily and annual VOC emission limitations are based on the emissions unit's potential to emit. Therefore, no record keeping or reporting is required to demonstrate compliance with these limits.

B. Operational Restrictions

1. The maximum annual volatile organic material usage (from inks, coatings and adhesive) for K001 - K011 shall not exceed 99.0 tons, based upon a rolling, 12-month summation of the volatile organic material figures.

The maximum annual HAPs material usage (from inks, coatings and adhesive) for K001 - K011 shall not exceed 10.0 tons/year for any individual HAP and 25.0 tons/year for any combination of HAPs, based upon a rolling, 12-month summation of the HAPs material usage figures.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the volatile organic material usage levels specified in the following table:

Month(s)

Emissions Unit ID: **K011**

	Maximum Allowable Cumulative Volatile Organic Material Usage for K001 - K011	Maximum Allowable Cumulative Individual HAPs Material Usage for K001 - K011	Maximum Allowable Cumulative Combined HAPs Material Usage for K001 - K011
1	15 tons	2.0 tons	6.0 tons
1-2	25 tons	3.0 tons	8.0 tons
1-3	35 tons	4.0 tons	10.0 tons
1-4	45 tons	5.0 tons	12.0 tons
1-5	55 tons	6.0 tons	14.0 tons
1-6	65 tons	7.0 tons	16.0 tons
1-7	75 tons	7.5 tons	18.0 tons
1-8	80 tons	8.0 tons	20.0 tons
1-9	85 tons	8.5 tons	22.0 tons
1-10	90 tons	9.0 tons	23.0 tons
1-11	95 tons	9.5 tons	24.0 tons
1-12	99.0 tons	10.0 tons	25.0 tons

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

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the VOC content of each coating and ink, in percent VOC by volume of the volatile matter in the coating and ink, as applied [calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{VOC,6}$].
2. The permittee shall collect and record the following information each month on a facility-wide basis, for emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011:
 - a. the name and identification number of each ink, coating, adhesive and cleanup material employed;
 - b. the weight, in pounds per month, of each ink, coating, adhesive and cleanup material employed, as applied;
 - c. the VOC content of each ink, coating, adhesive and cleanup material, as applied, in percent by weight;

Issued: To be entered upon final issuance

- d. the total volatile organic material usage and VOC emissions from all inks, coatings, and adhesives (calculated by summing the records from b x c), in pounds per month;
- e. the rolling, 12-month summation of volatile organic material usage and VOC emissions from all inks, coatings, and adhesives, in tons;
- f. the total VOC emissions from all cleanup materials (b x c), in pounds per month;
- g. the rolling, 12-month summation of VOC emissions from all cleanup materials, in tons;
- h. the individual and combined HAPs contents of each ink, coating, adhesive and cleanup material, as applied, in percent by weight;
- i. the total individual and combined HAPs material usage and emissions from all inks, coatings, adhesives and cleanup materials (b x h for each material), in pounds per month; and
- j. the rolling, 12-month summation of individual HAPs and combined HAPs material usage and emissions from all inks, coatings, adhesives, and cleanup material, in tons.

D. Reporting Requirements

- 1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings and inks (for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
- 2. The permittee shall submit deviation (excursion) reports which include the following information for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011:
 - a. an identification of each month during which the rolling, 12-month individual HAP material usage and emissions, from the use of inks, coatings, adhesives, and cleanup material in these emissions units, exceed 10.0 tons/yr based on a rolling, 12-month summation, and the actual rolling, 12-month combined HAP emissions for each such month;
 - b. an identification of each month during which the rolling, 12-month combined HAP material usage and emissions, from the use of inks, coatings, adhesives, and cleanup material in these emissions units, exceed 25.0 tons/yr based on a rolling, 12-month

Emissions Unit ID: **K011**

summation, and the actual rolling, 12-month combined HAP emissions for each such month;

- c. an identification of each month during which the rolling, 12-month VOC emissions, from the use of inks, coatings, and adhesives in these emissions unit, exceed 99.0 tons/yr based on a rolling, 12-month summation, and the actual rolling, 12-month VOC emissions for each such month;
- d. an identification of each month during which the rolling, 12-month volatile organic material usage exceeded 99.0 tons, and the actual rolling, 12-month usage; and
- e. an identification of each month during which the rolling, 12-month VOC emissions, from the use of cleanup materials in these emissions unit, exceed 0.45 ton/yr based on a rolling, 12-month summation, and the actual rolling, 12-month VOC emissions for each such month.

All deviation (excursion) reports shall be submitted in accordance with Section A.1. of the General Terms and Conditions of this permit.

3. As required by 40 CFR 63.830(b)(1), the permittee shall submit to the appropriate Ohio EPA District Office or local air agency an initial notification report no later than May 30, 1998, that contains the following information:
 - a. the name, title and address of the owner or operator;
 - b. the address (i.e., physical location) of the affected source;
 - c. identification of the applicable emission limitations and compliance date;
 - d. a statement of whether the affected emissions unit is located at a major source or at an area source; and
 - e. a brief description of each affected emissions unit, including the type of process operation performed.

E. Testing Requirements

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

Wey

PTI

Emissions Unit ID: **K011**

Issued: To be entered upon final issuance

a. Emission Limitation:

129.12 lbs VOC/day for K001 from a combination of inks, coatings and adhesives.

Applicable Compliance Method:

This emission limitation is based upon the unit's potential to emit, which is determined by multiplying the maximum hourly line speed (ft/hr) times the maximum print/coat width (in feet) times the max ink/coating/adhesive usage rate (lbs/Msf) times the maximum VOC content (percent by weight) times 24 hours per day.

b. Emission Limitation:

23.56 tons VOC/year for K001 from a combination of inks, coatings and adhesives, as a 12-month rolling summation.

Applicable Compliance Method:

The annual emission limitation for this emissions unit was established by multiplying the daily emission rate by 365 days of operation per year and dividing by 2000 pounds per ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the pounds per day limitation.

c. Emission Limitation:

0.45 ton VOC/year for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 for all cleanup material, as a 12-month rolling summation.

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping specified in Section C.2.g.

d. Emission Limitation:

99.0 tons VOC/yr for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 from a combination of inks, coatings and adhesives, as a 12-month rolling summation.

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping specified in Section C.2.e.

e. Emission Limitation:

10.0 tons individual HAPs/yr for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 from a combination of inks, coatings, adhesives and cleanup, as a 12-month rolling summation.

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping specified in Section C.2.j.

- f. Emission Limitation:
25.0 tons combined HAPs/yr for K001, K002, K003, K004, K005, K006, K007, K008, K009, K010 and K011 from a combination of inks, coatings, adhesives and cleanup, as a 12-month rolling summation.

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping specified in Section C.2.j.

- g. Emission Limitation:
VOC content of each coating and ink not to exceed 25 percent VOC by volume of the volatile matter of the coating and ink, as applied.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section C.2. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24A shall be used to determine the VOC contents of the coatings and inks. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24A.

F. Miscellaneous Requirements

1. The requirements of this permit to install shall supercede the requirements of PTI number 13-03938 issued July 3, 2002.