



Street Address:

State of Ohio Environmental Protection Agency  
Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:  
Lazarus Gov.  
Center

**RE: DRAFT PERMIT TO INSTALL MODIFICATION  
BUTLER COUNTY  
Application No: 14-04234**

**CERTIFIED MAIL**

**DATE:** 10/16/2001

Jefferson Smurfit Corporation  
Tim Kalasek  
407 Charles Street  
Middletown, OH 45042

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

A Permit to Install modification may be issued in proposed 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 modification a fee of **\$ 400** 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,

Thomas G. Rigo, Manager  
Field Operations and Permit Section  
Division of Air Pollution Control

CC: USEPA

HCDES

Ohio-Kentucky-Indiana Reg Coun of Gov

KY

IN



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install  
Terms and Conditions**

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

**DRAFT MODIFICATION OF PERMIT TO INSTALL 14-04234**

Application Number: 14-04234  
APS Premise Number: 1409010838  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Jefferson Smurfit Corporation  
Person to Contact: Tim Kalasek  
Address: 407 Charles Street  
Middletown, OH 45042

Location of proposed air contaminant source(s) [emissions unit(s)]:

**407 Charles Street  
Middletown, Ohio**

Description of proposed emissions unit(s):

**Modification to PTI 14-4234 as issued on 5/14/97, includes flexographic press 217, 218, lithographic press 100, 150, 175 and the finishing department.**

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

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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

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).

**Jefferson Smurfit Corporation**  
**PTI Application: 14-04234**  
**Issued: To be entered upon final issuance**

**Facility ID: 1409010838**

- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within 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>
OC	66.4
PM-PM10	0.072

Jefferson

PTI A

Emissions Unit ID: **K001**

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>	<u>Applicable Emissions Limitations/Control Measures</u>
K001 - Flexographic Press 217 (modification)	OAC rule 3745-31-05 (A)(3)	22.6 lbs OC/hr
	OAC rule 3745-31-05(D)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D), OAC rule 3745-21-09(Y)(1)(a) and 40 CFR Part 63, Subpart KK.
	OAC rule 3745-21-09 (Y)(1)(a)	4.5 TPY OC, based on a rolling 12-month summation.
	40 CFR Part 63, Subpart KK	See terms B.1. - B.6.  The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
		See term A.2.b

**2. Additional Terms and Conditions**

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the coating usage limitations, emissions limitations and OC content limitations.

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- 2.b** The potential usage of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

The permittee already has existing HAPs records, therefore, HAPs emission limits for the first 12 months of operation following the issuance of this permit are not required.

- 2.c** The hourly emission limitation outlined is based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with this limit.

**B. Operational Restrictions**

1. The maximum annual ink usage for this emissions unit shall not exceed 216,600\* pounds per year based upon a rolling, 12-month summation of the ink usage figures. The permittee already has existing ink usage records, therefore, ink usage limits for the first 12 months of operation following the issuance of this permit are not required.
2. The OC content of inks shall not exceed 3%\* by weight, as a rolling twelve month weighted average. Compliance shall be determined by the methods outlined in OAC rule 3745-21-10(B)(9) [for compliance with the TPY OC limit].
3. The maximum annual coating usage for this emissions unit shall not exceed 66,700\* pounds per year based upon a rolling, 12-month summation of the coating usage figures. The permittee already has existing coating usage records, therefore, coating usage limits for the first 12 months of operation following the issuance of this permit are not required.
4. The OC content of coatings shall not exceed 3%\* by weight, as a rolling twelve month weighted average. Compliance shall be determined by the methods outlined in OAC rule 3745-21-10(B)(9) [for compliance with the TPY OC limit].
5. The maximum annual cleanup material usage for this emissions unit shall not exceed 3,000\* pounds per year based upon a rolling, 12-month summation of the cleanup material usage figures. The permittee already has existing cleanup material usage records, therefore, cleanup material usage limits for the first 12 months of operation following the issuance of this permit are not required.
6. The OC content of cleanup material shall not exceed 30%\* by weight, as a rolling twelve month

weighted average. Compliance shall be determined by the methods outlined in OAC rule 3745-21-10(B)(9) [for compliance with the TPY OC limit].

\*The usage rates and OC content limitations may be exceeded provided the annual OC emissions limit is not exceeded. However, the following shall not be exceeded at any time:

- i The maximum OC content of inks shall not exceed 6% by weight.
  - ii The maximum OC content of coatings shall not exceed 6.3% by weight.
  - iii The maximum OC content of the inks and coatings shall not exceed:
    - a. forty percent OC by volume of the coating and ink, excluding water; or
    - b. twenty-five percent OC by volume of the volatile matter (including water) in the coating and ink.
7. The permittee shall store all spent OC containing cleaning materials and cleaning rags in covered containers.

**C. Monitoring and/or Recordkeeping Requirements**

- 1. The permittee shall maintain monthly records which list the following information for emissions unit K001:
  - a. The company identification of each ink, coating and cleanup material, as employed.
  - b. The amount of each ink, coating and cleanup material employed in pounds.
  - c. The weight percent OC content of each ink, coating and cleanup material.
  - d. The percent OC by volume of the coating and ink, excluding water.
  - e. The percent OC by volume of the volatile matter (including water) in the coating and ink.
  - f. The monthly weighted average OC content (in percent by wt.) of each ink, coating and cleanup material.
  - g. The monthly OC emissions in pounds or tons from this emissions units based on a 7% organic solvent retention for inks and 100% organic solvent evaporation for coatings and cleanup material.
  - h. The updated rolling, 12- month summation for the ink, coating and cleanup material usage figures in pounds per year.

**Jefferson**

**PTI A**

Emissions Unit ID: **K001**

**Issued: To be entered upon final issuance**

- i. The updated rolling twelve month weighted average OC content (in percent by wt.) for inks, coatings and cleanup material.
  - j. The updated rolling, 12- month summation of the OC emissions in tons per year.
2. The permittee shall collect and record the following information each month for the entire facility:
- a. The name and identification number of each ink, coating, fountain solution, cleanup material and adhesive employed.
  - b. The individual Hazardous Air Pollutant (HAP)\* content for each HAP of each ink, coating, fountain solution, cleanup material and adhesive in weight percent of individual HAP, as applied.

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- c. The total combined Hazardous Air Pollutant (HAP) content of each ink, coating, fountain solution, cleanup material and adhesive in weight percent of combined HAPs [sum all the individual HAP contents from (b)].
- d. The number of pounds of each ink, coating, fountain solution, cleanup material and adhesive employed.
- e. The total individual HAP usage for each HAP from all inks, coatings, fountain solutions, cleanup materials and adhesives employed, in pounds or tons per month (for each HAP the sum of (b) times (d) for each ink, coating, fountain solution, cleanup material and adhesive).
- f. The total combined HAP usage from all inks, coatings, fountain solutions, cleanup materials and adhesives employed, in pounds or tons per month (the sum of (c) times (d) for each ink, coating, fountain solution, cleanup material and adhesive).
- g. The updated rolling, 12-month summation of usage for each individual HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
- h. The updated rolling, 12-month summation of usage for total combined HAPs emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

\* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.

**D. Reporting Requirements**

- 1. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP emissions limitations set forth in this Permit to Install. The permittee shall submit annual reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year. If no exceedances occurred during the reporting period then a report is required stating so.
- 2. The permittee shall submit semi-annual reports which include the following information:

**Jefferson Smurfit Corporation**

**PTI A**

**Issued**

**Facility ID: 1409010838**

**Emissions Unit ID: K001**

- a. The updated rolling twelve month total usage for inks, coatings and cleanup materials in pounds per year; for each month.
- b. The updated rolling twelve month weighted average OC content (in percent by wt.) for inks, coatings and cleanup material; for each month.

Jefferson

PTI A

Issued: To be entered upon final issuance

Emissions Unit ID: **K001**

c. The updated rolling twelve month total OC emissions in tons per year; for each month.

These reports shall be submitted by August 15 and February 15 of each year and shall cover the previous six calendar months (January to June and July to December, respectively).

3. The permittee shall notify the Hamilton County Department of Environmental Services of any record showing that this emissions unit has exceeded the emission limitations and/or the operational limitations outlined in this permit. A copy of such record shall be sent to the Hamilton County Department of Environmental Services within 30 days after the exceedance occurs.

#### **E. Testing Requirements**

1. Compliance with the usage limitations in terms B.1, B.3 and B.5 shall be demonstrated by the record keeping in term C.1.
2. Compliance with the weight percent OC content limitations in terms B.2, B.4 and B.6 shall be demonstrated by the record keeping in term C.1.
3. Compliance with the HAPs emission limitations in term A.2.b shall be demonstrated by the record keeping requirements specified in term C.2.

#### **F. Miscellaneous Requirements**

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

Jefferson

PTI A

Emissions Unit ID: R002

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**

- 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>	<u>Applicable Emissions Limitations/Control Measures</u>
R002 - Lithographic Press 100 (modification)	OAC rule 3745-31-05 (A)(3)	96.7 lbs OC/hr*  6 lbs / month PM-PM10 72 lbs / year PM-PM10  * This limit is applicable on any day when no photochemically reactive materials (PRMs) are employed in this emissions unit.  The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(B)(1), OAC rule 3745-21-07(G)(2), OAC rule 3745-31-05(D), and 3745-17-08.
	OAC rule 3745-31-05(D)	28.1 TPY OC, based upon a rolling, 12-month summation
	OAC rule 3745-17-07(B)(1)	See terms A.2.d. and B.1. - B.7.
	OAC rule 3745-17-08	See term A.2.b.
	OAC rule 3745-21-07 (G)(2)	See term A.2.c.

8 lbs OC/hr\*\*  
40 lbs OC/day\*\*

\*\*These limits are applicable on any day when PRMs are employed in this emissions unit.

## 2. Additional Terms and Conditions

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the coating usage limits, emissions limits and OC content limits.
- 2.b The visible fugitive particulate emissions from this emissions unit shall not exceed twenty percent opacity as a three minute average.
- 2.c The permittee shall employ reasonably available control measures to minimize or eliminate visible emissions of fugitive dust.
- 2.d The potential usage of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

The permittee already has existing HAPs records, therefore, HAPs emission limits for the first 12 months of operation following the issuance of this permit are not required.

- 2.e The 96.7 lbs OC/hr emission limitation outlined is based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with this limit.

## B. Operational Restrictions

- 1. The maximum annual ink usage for this emissions unit shall not exceed 124,480\* pounds per year based upon a rolling, 12-month summation of the ink usage figures. The permittee already has existing ink usage records, therefore, ink usage limits for the first 12 months of operation following the issuance of this permit are not required.
- 2. The OC content of inks shall not exceed 15%\* by weight, as a rolling twelve month weighted average. Compliance shall be determined by the methods outlined in OAC rule 3745-21-10(B)(9) [for compliance with the TPY OC limit].

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3. The maximum annual coating usage for this emissions unit shall not exceed 373,440\* pounds per year based upon a rolling, 12-month summation of the coating usage figures. The permittee already has existing coating usage records, therefore, coating usage limits for the first 12 months of operation following the issuance of this permit are not required.
4. The OC content of coatings shall not exceed 5.4%\* by weight, as a rolling twelve month weighted average. Compliance shall be determined by the methods outlined in OAC rule 3745-21-10(B)(9) [for compliance with the TPY OC limit].
5. The maximum annual fountain solution usage for this emissions unit shall not exceed 58,950\* pounds per year based upon a rolling, 12-month summation of the coating usage figures. The permittee already has existing fountain solution usage records, therefore, fountain solution usage limits for the first 12 months of operation following the issuance of this permit are not required.
6. The OC content of fountain solution shall not exceed 8.2%\* by weight, as a rolling twelve month weighted average. Compliance shall be determined by the methods outlined in OAC rule 3745-21-10(B)(9) [for compliance with the TPY OC limit].
7. The maximum annual cleanup material usage for this emissions unit shall not exceed 30,200\* pounds per year based upon a rolling, 12-month summation of the cleanup material usage figures. The permittee already has existing cleanup material usage records, therefore, cleanup material usage limits for the first 12 months of operation following the issuance of this permit are not required.

\*The usage rates and OC content limitations may be exceeded provided the annual OC emissions limit is not exceeded. However, the following shall not be exceeded at any time:

- i. The maximum OC content of inks shall not exceed 30% by weight.
  - ii. The maximum OC content of coatings shall not exceed 20% by weight.
  - iii. The maximum OC content of fountain solution shall not exceed 35% by weight..
8. The permittee shall operate the existing chiller system on emissions unit R002 to refrigerate the fountain solution while the press is running production.
  9. The permittee shall store all spent OC containing cleaning materials and cleaning rags in covered containers.

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall maintain monthly records which list the following information for emissions unit R002:

**Jefferson Smurfit Corporation**

**PTI A**

**Issued**

**Facility ID: 1409010838**

**Emissions Unit ID: R002**

- a. The company identification of each ink, coating, fountain solution and cleanup material employed.
- b. The amount of each ink, coating, fountain solution and cleanup material employed in pounds.
- c. The weight percent OC content of each ink, coating and fountain solution.
- d. The monthly weighted average OC content (in percent by wt.) of each material type: ink, coating and fountain solution.
- e. The monthly OC emissions in pounds or tons from this emissions units based on a 95% organic solvent retention for inks and 100% organic solvent evaporation for coatings, fountain solutions and cleanup materials. If the permittee sends waste collected for waste disposal, the

Jefferson

PTI A

Emissions Unit ID: **R002**

**Issued: To be entered upon final issuance**

- permittee may take a credit for that in emissions calculations provided that the permittee keeps adequate records to calculate the total amount of OCs in the waste disposed of from this emissions unit.
- f. The updated rolling, 12- month total usage for the inks, coatings, fountain solutions and cleanup materials in pounds per year.
  - g. The updated rolling, 12-month weighted average OC content (in percent by wt.) for inks, coatings and fountain solution.
  - h. The updated rolling, 12-month total OC emissions in tons per year.
2. The permittee shall collect and record the following information for any day that a PRM is used in emissions unit R002:
- a. The company identification for each ink, coating, fountain solution and cleanup material employed.
  - b. Documentation on whether or not each ink, coating, fountain solution and cleanup material is a photochemically reactive material.
  - c. The number of pounds of each ink, coating, fountain solution and cleanup material employed..
  - d. The weight percent OC content of each ink, coating, fountain solution and cleanup material.
  - e. The OC emission rate for each ink, coating, fountain solution and cleanup material, in pounds per day; based on a 95% organic solvent retention for inks and 100% organic solvent evaporation for coatings, fountain solution and cleanup material. If the permittee sends waste collected for waste disposal, the permittee may take a credit for that in emissions calculations provided that the permittee keeps adequate records to calculate the total amount of OCs in the waste disposed of from this emissions unit.
  - f. The total OC emissions rate from all inks, coatings, fountain solution and cleanup material, in pounds per day;
  - g. The total number of hours the emissions unit was in operation.
  - h. The average hourly OC emission rate for all ink, coating, fountain solution and cleanup materials, i.e., (f)/(g), in pounds per hour (average).

Jefferson

PTI A

Issued: To be entered upon final issuance

Emissions Unit ID: **R002**

[**Note:** The information must be for the inks, coatings and fountain solution, as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "non-photochemically" are based upon OAC rule 3745-21-01(C)(5).]

3. The permittee shall collect and record the following information each month for the entire facility:
  - a. The name and identification number of each ink, coating, fountain solution, cleanup material and adhesive employed.
  - b. The individual Hazardous Air Pollutant (HAP)\* content for each HAP of each ink, coating, fountain solution, cleanup material and adhesive in weight percent of individual HAP, as applied.
  - c. The total combined Hazardous Air Pollutant (HAP) content of each ink, coating, fountain solution, cleanup material and adhesive in weight percent of combined HAPs, as applied [sum all the individual HAP contents from (b)].
  - d. The number of pounds of each ink, coating, fountain solution, cleanup material and adhesive employed.
  - e. The total individual HAP usage for each HAP from all inks, coatings, fountain solutions, cleanup materials and adhesives employed, in pounds or tons per month (for each HAP the sum of (b) times (d) for each ink, coating, fountain solution, cleanup material and adhesive).
  - f. The total combined HAP usage from all inks, coatings, fountain solutions, cleanup materials and adhesives employed, in pounds or tons per month (the sum of (c) times (d) for each ink, coating, fountain solution, cleanup material and adhesive).
  - g. The updated rolling, 12-month summation of usage for each individual HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
  - h. The updated rolling, 12-month summation of usage for total combined HAPs emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

\* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.

**D. Reporting Requirements**

1. The permittee shall submit semi-annual reports which include the following information:
  - a. The updated rolling, 12-month total usage for inks, coatings, fountain solutions and cleanup materials in pounds per year; for each month.
  - b. The updated rolling, 12-month weighted average OC content (in percent by wt.) for inks, coatings and fountain solution; for each month.

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Emissions Unit ID: **R002**

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- c. The updated rolling, 12-month total OC emissions in tons per year; for each month.

These reports shall be submitted by August 15 and February 15 of each year and shall cover the previous six calendar months (January to June and July to December, respectively).

2. The permittee shall notify the Hamilton County Department of Environmental Services of any record showing that this emissions unit has exceeded the emission limitations and/or the operational limitations outlined in this permit. A copy of such record shall be sent to the Hamilton County Department of Environmental Services within 30 days after the exceedance occurs.
3. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP emissions limitations set forth in this Permit to Install. The permittee shall submit annual reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year. If no exceedances occurred during the reporting period then a report is required stating so.

#### **E. Testing Requirements**

1. Compliance with the visible fugitive particulate emissions limitation shall be demonstrated by Method 9, 40 CFR Part 60, Appendix A.
2. Compliance with the usage limitations in terms B.1, B.3, B.5 and B.7 shall be demonstrated by the record keeping in term C.1.
3. Compliance with the weight percent OC content limitations in terms B.2, B.4 and B.6 shall be demonstrated by the record keeping in term C.1.
4. Compliance with 8 pounds per hour and 40 pounds per day emission limitations shall be demonstrated by the record keeping in term C.2.
5. Compliance with the HAPs emission limitations in term A.2.d. shall be demonstrated by the record keeping requirements specified in term C.3.

#### **F. Miscellaneous Requirements**

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

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PTI A

Emissions Unit ID: R005

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

**A. Applicable Emissions Limitations and/or Control Requirements**

- 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>	<u>Applicable Emissions Limitations/Control Measures</u>
R005 - Lithographic Press 150 (modification)	OAC rule 3745-31-05 (A)(3)	88.5 lbs OC/hr*  6 lbs / month PM-PM10 72 lbs / year PM-PM10  * This limit is applicable on any day when no photochemically reactive materials (PRMs) are employed in this emissions unit.
	OAC rule 3745-31-05(D)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(B)(1), OAC rule 3745-17-08, OAC rule 3745-21-07(G)(2) and OAC rule 3745-31-05(D).
	OAC rule 3745-17-07(B)(1)	28.1 TPY OC, based upon a rolling, 12-month summation.
	OAC rule 3745-17-08	See terms A.2.d. and B.1. - B.7.
	OAC rule 3745-21-07 (G)(2)	See term A.2.b.
		See term A.2.c.

8 lbs OC/hr\*\*  
40 lbs OC/day\*\*

\*\*These limits are applicable on any day when PRMs are employed in this emissions unit.

## 2. Additional Terms and Conditions

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the coating usage limits, emissions limits and OC content limits.
- 2.b The visible fugitive particulate emissions from this emissions unit shall not exceed twenty percent opacity as a three minute average.
- 2.c The permittee shall employ reasonably available control measures to minimize or eliminate visible emissions of fugitive dust.
- 2.d The potential usage of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

The permittee already has existing HAPs records, therefore, HAPs emission limits for the first 12 months of operation following the issuance of this permit are not required.

- 2.e The 88.5 lbs OC/hr emission limitation outlined is based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with this limit.

## B. Operational Restrictions

- 1. The maximum annual ink usage for this emissions unit shall not exceed 124,480\* pounds per year based upon a rolling, 12-month summation of the ink usage figures. The permittee already has existing ink usage records, therefore, ink usage limits for the first 12 months of operation following the issuance of this permit are not required.
- 2. The OC content of inks shall not exceed 15%\* by weight, as a rolling twelve month weighted average. Compliance shall be determined by the methods outlined in OAC rule 3745-21-10(B)(9)

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[for compliance with the TPY OC limit].

3. The maximum annual coating usage for this emissions unit shall not exceed 373,440\* pounds per year based upon a rolling, 12-month summation of the coating usage figures. The permittee already has existing coating usage records, therefore, coating usage limits for the first 12 months of operation following the issuance of this permit are not required.
4. The OC content of coatings shall not exceed 5.4%\* by weight, as a rolling twelve month weighted average. Compliance shall be determined by the methods outlined in OAC rule 3745-21-10(B)(9) [for compliance with the TPY OC limit].
5. The maximum annual fountain solution usage for this emissions unit shall not exceed 58,950\* pounds per year based upon a rolling, 12-month summation of the coating usage figures. The permittee already has existing fountain solution usage records, therefore, fountain solution usage limits for the first 12 months of operation following the issuance of this permit are not required.
6. The OC content of fountain solution shall not exceed 8.2%\* by weight, as a rolling twelve month weighted average. Compliance shall be determined by the methods outlined in OAC rule 3745-21-10(B)(9) [for compliance with the TPY OC limit].
7. The maximum annual cleanup material usage for this emissions unit shall not exceed 30,200\* pounds per year based upon a rolling, 12-month summation of the cleanup material usage figures. The permittee already has existing cleanup material usage records, therefore, cleanup material usage limits for the first 12 months of operation following the issuance of this permit are not required.

\*The usage rates and OC content limitations may be exceeded provided the annual OC emissions limit is not exceeded. However, the following shall not be exceeded at any time:

- i The maximum OC content of inks shall not exceed 30% by weight.
- ii The maximum OC content of coatings shall not exceed 20% by weight.
- iii The maximum OC content of fountain solution shall not exceed 35% by weight..

8. The permittee shall operate the existing chiller system on emissions unit R005 to refrigerate the fountain solution while the press is running production.
9. The permittee shall store all spent OC containing cleaning materials and cleaning rags in covered containers.

**C. Monitoring and/or Recordkeeping Requirements**

Emissions Unit ID: **R005**

1. The permittee shall maintain monthly records which list the following information for emissions unit R005:
  - a. The company identification of each ink, coating, fountain solution and cleanup material employed.
  - b. The amount of each ink, coating, fountain solution and cleanup material employed in pounds.
  - c. The weight percent OC content of each ink, coating and fountain solution.
  - d. The monthly weighted average OC content (in percent by wt.) of each material type: ink, coating and fountain solution.
  - e. The monthly OC emissions in pounds or tons from this emissions units based on a 95% organic solvent retention for inks and 100% organic solvent evaporation for coatings, fountain solution and cleanup material. If the permittee sends waste collected for waste disposal, the permittee may take a credit for that in emissions calculations provided that the permittee keeps adequate records to calculate the total amount of OCs in the waste disposed of from this emissions unit.
  - f. The updated rolling, 12-month total usage for the inks, coatings, fountain solutions and cleanup materials in pounds per year.
  - g. The updated rolling, 12-month weighted average OC content (in percent by wt.) for inks, coatings and fountain solution.
  - h. The updated rolling, 12-month total OC emissions in tons per year.
2. The permittee shall collect and record the following information for any day that a PRM is used in emissions unit R005:
  - a. The company identification for each ink, coating, fountain solution and cleanup material employed.
  - b. Documentation on whether or not each ink, coating, fountain solution and cleanup material is a photochemically reactive material.
  - c. The number of pounds of each ink, coating, fountain solution and cleanup material employed..

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- d. The weight percent OC content of each ink, coating, fountain solution and cleanup material.
- e. The OC emission rate for each ink, coating, fountain solution and cleanup material, in pounds per day; based on a 95% organic solvent retention for inks and 100% organic solvent evaporation for coatings, fountain solution and cleanup material. If the permittee sends waste collected for waste disposal, the permittee may take a credit for that in emissions calculations provided that the permittee keeps adequate records to calculate the total amount of OCs in the waste disposed of from this emissions unit.
- f. The total OC emissions rate from all inks, coatings, fountain solution and cleanup material, in pounds per day;
- g. The total number of hours the emissions unit was in operation.
- h. The average hourly OC emission rate for all ink, coating, fountain solution and cleanup materials, i.e., (f)/(g), in pounds per hour (average).

**[Note:** The information must be for the inks, coatings and fountain solution, as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "non-photochemically" are based upon OAC rule 3745-21-01(C)(5).]

- 3. The permittee shall collect and record the following information each month for the entire facility:
  - a. The name and identification number of each ink, coating, fountain solution, cleanup material and adhesive employed.
  - b. The individual Hazardous Air Pollutant (HAP)\* content for each HAP of each ink, coating, fountain solution, cleanup material and adhesive in weight percent of individual HAP, as applied.
  - c. The total combined Hazardous Air Pollutant (HAP) content of each ink, coating, fountain solution, cleanup material and adhesive in weight percent of combined HAPs, as applied [sum all the individual HAP contents from (b)].
  - d. The number of pounds of each ink, coating, fountain solution, cleanup material and adhesive employed.
  - e. The total individual HAP usage for each HAP from all inks, coatings, fountain solutions, cleanup materials and adhesives employed, in pounds or tons per month (for each HAP the sum of (b) times (d) for each ink, coating, fountain solution, cleanup material and adhesive).

- f. The total combined HAP usage from all inks, coatings, fountain solutions, cleanup materials and adhesives employed, in pounds or tons per month (the sum of (c) times (d) for each ink, coating, fountain solution, cleanup material and adhesive).
- g. The updated rolling, 12-month summation of usage for each individual HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
- h. The updated rolling, 12-month summation of usage for total combined HAPs emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

\* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.

**D. Reporting Requirements**

- 1. The permittee shall submit semi-annual reports which include the following information:
  - a. The updated rolling, 12-month total usage for inks, coatings, fountain solutions and cleanup materials in pounds per year; for each month.
  - b. The updated rolling, 12- month weighted average OC content (in percent by wt.) for inks, coatings and fountain solution; for each month.

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- c. The updated rolling, 12-month total OC emissions in tons per year; for each month.

These reports shall be submitted by August 15 and February 15 of each year and shall cover the previous six calendar months (January to June and July to December, respectively).

- 2. The permittee shall notify the Hamilton County Department of Environmental Services of any record showing that this emissions unit has exceeded the emission limitations and/or the operational limitations outlined in this permit. A copy of such record shall be sent to the Hamilton County Department of Environmental Services within 30 days after the exceedance occurs.
- 3. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP emissions limitations set forth in this Permit to Install. The permittee shall submit annual reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year. If no exceedances occurred during the reporting period then a report is required stating so.

**E. Testing Requirements**

- 1. Compliance with the visible fugitive particulate emissions limitation shall be demonstrated by Method 9, 40 CFR Part 60, Appendix A.
- 2. Compliance with the usage limitations in terms B.1, B.3, B.5 and B.7 shall be demonstrated by the record keeping in term C.1.
- 3. Compliance with the weight percent OC content limitations in terms B.2, B.4 and B.6 shall be demonstrated by the record keeping in term C.1.
- 4. Compliance with 8 pounds per hour and 40 pounds per day emission limitations shall be demonstrated by the record keeping in term C.2.
- 5. Compliance with the HAPs emission limitations in term A.2.d. shall be demonstrated by the record keeping requirements specified in term C.3.

**F. Miscellaneous Requirements**

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

Jefferson

PTI A

Emissions Unit ID: R008

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**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>	<u>Applicable Emissions Limitations/Control Measures</u>
R008 - Finishing Department (modification)	OAC rule 3745-31-05 (A)(3)	7.74 lbs OC/hr  The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2) and OAC rule 3745-31-05(D).
	OAC rule 3745-31-05(D)	5.7 TPY OC, based upon a rolling, 12-month summation
	OAC rule 3745-21-07 (G)(2)	See terms A.2.c., B.1. and B.2.  40 lbs OC/day*  *This limit is applicable on any day when PRMs are employed in this emissions unit.

**2. Additional Terms and Conditions**

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the coating usage limits, emissions limits and OC content limits.
- 2.b The hourly emission limitation outlined is based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with this limit.

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**PTI A**

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- 2.c** The potential usage of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

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The permittee already has existing HAPs records, therefore, HAPs emission limits for the first 12 months of operation following the issuance of this permit are not required.

**B. Operational Restrictions**

1. The maximum annual adhesive usage for this emissions unit shall not exceed 226,000\* pounds per year based upon a rolling, 12-month summation of the adhesive usage figures. The permittee already has existing adhesive usage records, therefore, adhesive usage limits for the first 12 months of operation following the issuance of this permit are not required.
2. The OC content of adhesives shall not exceed 5%\* by weight, as a rolling twelve month weighted average. Compliance shall be determined by the methods outlined in OAC rule 3745-21-10(B)(9) [for compliance with the TPY OC limit].

\*The usage rate and OC content limitation may be exceeded provided the annual OC emissions limit is not exceeded. However, the maximum OC content of adhesives shall not exceed 30% by weight.

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall maintain monthly records which list the following information for emissions unit R008:
  - a. The company identification of each adhesive employed.
  - b. The amount of each adhesive employed in pounds.
  - c. The weight percent OC content of each adhesive.
  - d. The monthly weighted average OC content (in percent by wt.) of all adhesives.
  - e. The monthly OC emissions in pounds or tons from this emissions unit.
  - f. The updated rolling, 12-month total usage for adhesives in pounds per year.
  - g. The updated rolling, 12-month weighted average OC content (in percent by wt.) for adhesives.
  - h. The updated rolling, 12-month total OC emissions in tons per year.

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2. The permittee shall collect and record the following information for any day that a PRM is used in emissions unit R008:
  - a. The company identification for each adhesive employed.
  - b. Documentation on whether or not each adhesive is a photochemically reactive material.
  - c. The number of pounds of each adhesive employed.
  - d. The weight percent OC content of each adhesive.
  - e. The OC emission rate for each adhesive.
  - f. The total OC emission rate for all adhesives.

**[Note:** The information must be for adhesives, as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "non-photochemically" are based upon OAC rule 3745-21-01(C)(5).]

3. The permittee shall collect and record the following information each month for the entire facility:
  - a. The name and identification number of each ink, coating, fountain solution, cleanup material and adhesive employed.
  - b. The individual Hazardous Air Pollutant (HAP)\* content for each HAP of each ink, coating, fountain solution, cleanup material and adhesive in weight percent of individual HAP, as applied.
  - c. The total combined Hazardous Air Pollutant (HAP) content of each ink, coating, fountain solution, cleanup material and adhesive in weight percent of combined HAPs, as applied [sum all the individual HAP contents from (b)].
  - d. The number of pounds of each ink, coating, fountain solution, cleanup material and adhesive employed.
  - e. The total individual HAP usage for each HAP from all inks, coatings, fountain solutions, cleanup materials and adhesives employed, in pounds or tons per month (for each HAP the sum of (b) times (d) for each ink, coating, fountain solution, cleanup material and adhesive).
  - f. The total combined HAP usage from all inks, coatings, fountain solutions, cleanup materials

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and adhesives employed, in pounds or tons per month (the sum of (c) times (d) for each ink, coating, fountain solution, cleanup material and adhesive).

- g. The updated rolling, 12-month summation of usage for each individual HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
- h. The updated rolling, 12-month summation of usage for total combined HAPs emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

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\* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.

**D. Reporting Requirements**

1. The permittee shall submit semi-annual reports which include the following information:
  - a. The updated rolling, 12-month total usage for adhesives in pounds per year; for each month
  - b. The updated rolling, 12-month weighted average OC content (in percent by wt.) for adhesives; for each month.
  - c. The updated rolling, 12-month total OC emissions in tons per year; for each month.

These reports shall be submitted by August 15 and February 15 of each year and shall cover the previous six calendar months (January to June and July to December, respectively).

2. The permittee shall notify the Hamilton County Department of Environmental Services of any record showing that this emissions unit has exceeded the emission limitations and/or the operational limitations outlined in this permit. A copy of such record shall be sent to the Hamilton County Department of Environmental Services within 30 days after the exceedance occurs.
3. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP emissions limitations set forth in this Permit to Install. The permittee shall submit annual reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year. If no exceedances occurred during the reporting period then a report is required stating so.

**E. Testing Requirements**

1. Compliance with the usage limitations in term B.1 shall be demonstrated by the record keeping in term C.1.
2. Compliance with the weight percent OC content limitations in term B.2 shall be demonstrated by the record keeping in term C.1.
3. Compliance with the 40 pounds per day emission limitation shall be demonstrated by the record

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keeping in term C.2.

4. Compliance with the HAPs emission limitations in term A.2.c. shall be demonstrated by the record keeping requirements specified in term C.3.

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**F. Miscellaneous Requirements**

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