

Facility ID: 0855140083 Issuance type: Title V Preliminary Proposed Permit

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part III" and before "I. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

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## Part II - Specific Facility Terms and Conditions

### a State and Federally Enforceable Section

1. None

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### b State Only Enforceable Section

1. The following insignificant emissions units are located at this facility:

- B001 Leffel boiler #4
- B002 Bryan Model L-56 boiler
- B003 Leffel boiler #2
- B004 Leffel boiler #3
- K008 #16 Coater
- L001 Safety Kleen degreaser
- P004 Majac grinder
- T001 Reclaimed toluene tank
- T002 Methanol tank
- T003 New toluene tank
- T006 Holding tank 5A
- T007 Holding tank 5B
- T008 Holding tank 6A
- T009 Holding tank 6B
- Z001 Slitting space heater
- Z002 Solvent space heater
- Z007 Heat seal mix
- Z011 #26 Duster

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitation and/or control requirements contained within the Permit to Install for the emissions unit.

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**Part III - Terms and Conditions for Emissions Units**

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Facility ID: 0855140083 Emissions Unit ID: K002 Issuance type: Title V Preliminary Proposed Permit

**A. State and Federally Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
paper coater no. 5	OAC rule 3745-21-09(F)	less than or equal to 2.9 lbs volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents

**2. Additional Terms and Conditions**

- (a) None

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**II. Operational Restrictions**

1. None

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**III. Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information each month for the line:
  - a. The name and identification number of each coating, as applied.
  - b. The VOC content of each coating, in lbs/gallon (excluding water and exempt solvents), as applied.

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**IV. Reporting Requirements**

1. The permittee shall notify the Director (appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director within 30 days following the end of the calendar month.

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**V. Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.1.1. of these terms and conditions shall be determined in accordance with the following method(s):
  - Emission Limitation -
  - 2.9 lbs VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method -

The permittee shall demonstrate compliance based upon the record keeping requirements specified in Section A.III.1 of this permit.

USEPA Method 24 shall be used to determine the VOC contents for all the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0855140083 Emissions Unit ID: K002 Issuance type: Title V Preliminary Proposed Permit

**B. State Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
<b>2. Additional Terms and Conditions</b>		
1. None		

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II. **Operational Restrictions**

- 1. None

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III. **Monitoring and/or Record Keeping Requirements**

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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**Part III - Terms and Conditions for Emissions Units**

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Facility ID: 0855140083 Emissions Unit ID: K003 Issuance type: Title V Preliminary Proposed Permit

**A. State and Federally Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
paper coater no. 1	OAC rule 3745-21-09(F)	less than or equal to 2.9 lbs volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents

2. **Additional Terms and Conditions**

- (a) None

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II. **Operational Restrictions**

- 1. None

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III. **Monitoring and/or Record Keeping Requirements**

- 1. The permittee shall collect and record the following information each month for the line:
  - a. The name and identification number of each coating, as applied.
  - b. The VOC content of each coating, in lbs/gallon (excluding water and exempt solvents), as applied.

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IV. **Reporting Requirements**

- 1. The permittee shall notify the Director (appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director within 30 days following the end of the calendar month.

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V. **Testing Requirements**

- 1. Compliance with the emission limitation(s) in Section A.1.1. of these terms and conditions shall be determined in accordance with the following method(s):  
Emission Limitation -  
2.9 lbs VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method -

The permittee shall demonstrate compliance based upon the record keeping requirements specified in Section A.III.1 of this permit.

USEPA Method 24 shall be used to determine the VOC contents for all the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0855140083 Emissions Unit ID: K003 Issuance type: Title V Preliminary Proposed Permit

**B. State Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
2. <b>Additional Terms and Conditions</b>			
1.	None		

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II. **Operational Restrictions**

- 1. None

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III. **Monitoring and/or Record Keeping Requirements**

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0855140083 Emissions Unit ID: K004 Issuance type: Title V Preliminary Proposed Permit

**A. State and Federally Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
paper coater no. 2, with flexographic printing	OAC rule 3745-27-09(Y)(1)	40% VOC by volume of the coating and ink, excluding water and exempt solvents; or 25% VOC by volume of the volatile matter in the coating and ink
	40 CFR, Part 63, Subpart KK	See A.II.1.
<b>2. Additional Terms and Conditions</b>		
(a) None		

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**II. Operational Restrictions**

1. The maximum amount of organic hazardous air pollutants (HAP) employed in this emissions unit each month for flexographic printing shall not exceed 400 kilograms (kgs).

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**III. Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information each month for the line:
  - a. The name and identification number of each coating and ink, as applied.
  - b. The VOC content of each coating and ink used in this emissions unit, as applied, in percent by volume of the coating and ink, excluding water and exempt solvents, and in percent by volume of the volatile matter in the coating and ink.
2. The permittee shall maintain monthly records of the following for each material employed for flexographic printing in this emissions unit:
  - a. The total volume, in gallons, of each material employed.
  - b. The organic HAP content, in pounds/gallon, of each material employed.
  - c. The total organic HAP usage, in kgs, from all the materials employed [summation of (a x b) for all materials, converted to kgs].

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**IV. Reporting Requirements**

1. The permittee shall notify the Director (appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings and inks in this emissions unit (i.e., for VOC contents). The notification shall include a copy of such record and shall be sent to the Director within 30

days following the end of the calendar month.

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the monthly organic HAP usage limitation (for flexographic printing) of 400 kgs .

These quarterly deviation reports shall be submitted in accordance with section A.1.c. of the General Terms and Conditions of this permit.

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V. **Testing Requirements**

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

- a. Emission Limitations -  
40% VOC by volume of the coating and ink, excluding water and exempt solvents; or 25% VOC by volume of the volatile matter in the coating and ink

Applicable Compliance Method -  
The permittee shall demonstrate compliance based upon the record keeping requirements specified in Section A.III.1 of this permit.

USEPA Method 24 and 24A shall be used to determine the VOC contents for (a)coatings and (b) flexographic printing inks and related coatings, respectively. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 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 24 or 24A.

- b. Usage Limitation -  
400 kgs organic HAP/month

Applicable Compliance Method -  
The permittee shall demonstrate compliance based upon the record keeping requirements specified in Section A.III.2 of this permit.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0855140083 Emissions Unit ID: K004 Issuance type: Title V Preliminary Proposed Permit

**B. State Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

- 1. None

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III. **Monitoring and/or Record Keeping Requirements**

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0855140083 Emissions Unit ID: K006 Issuance type: Title V Preliminary Proposed Permit

**A. State and Federally Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
paper coater no. 4	OAC rule 3745-21-09(F)	less than or equal to 2.9 lbs volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents

**2. Additional Terms and Conditions**

- (a) None

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II. **Operational Restrictions**

- 1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information each month for the line:
  - a. The name and identification number of each coating, as applied.
  - b. The VOC content of each coating, in lbs/gallon (excluding water and exempt solvents), as applied.

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**IV. Reporting Requirements**

1. The permittee shall notify the Director (appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director within 30 days following the end of the calendar month.

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**V. Testing Requirements**

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

Emission Limitation -  
2.9 lbs VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method -  
The permittee shall demonstrate compliance based upon the record keeping requirements specified in Section A.III.1 of this permit.

USEPA Method 24 shall be used to determine the VOC contents for all the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

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**VI. Miscellaneous Requirements**

1. None

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Facility ID: 0855140083 Emissions Unit ID: K006 Issuance type: Title V Preliminary Proposed Permit

**B. State Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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**2. Additional Terms and Conditions**

1. None

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**II. Operational Restrictions**

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**III. Monitoring and/or Record Keeping Requirements**

- 1. None

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**IV. Reporting Requirements**

- 1. None

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**V. Testing Requirements**

- 1. None

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**VI. Miscellaneous Requirements**

- 1. None

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**Facility ID: 0855140083 Issuance type: Title V Preliminary Proposed Permit**

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**Facility ID: 0855140083 Emissions Unit ID: K010 Issuance type: Title V Preliminary Proposed Permit**

**A. State and Federally Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
flexographic printing press no. 61	OAC rule 3745-31-05(A)(3) PTI 08-03949	16% volatile organic compounds (VOC) by volume of the coating and ink, excluding water;
	40 CFR, Part 63, Subpart KK OAC rule 3745-21-09(Y)(1)	1.55 lbs VOC/hour and 6.79 TYPY VOC See A.II.1. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

**2. Additional Terms and Conditions**

- a. The 1.55 lbs VOC/hour emission limitation was developed for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

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**II. Operational Restrictions**

- 1. The maximum amount of organic hazardous air pollutants (HAP) employed in this emissions unit each month

for flexographic printing shall not exceed 400 kilograms (kgs).

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**III. Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information each month for the printing operation:
  - a. The name and identification number of each coating and ink, as applied.
  - b. The percent VOC by volume of each coating and ink, excluding water, as applied.
  - c. The number of gallons, excluding water, of each coating and ink employed.
  - d. The total VOC emissions from all the coatings and inks employed, in tons.
2. The permittee shall maintain monthly records of the following for each material employed for flexographic printing in this emissions unit:
  - a. The total volume, in gallons, of each material employed.
  - b. The organic HAP content, in pounds/gallon, of each material employed.
  - c. The total organic HAP usage, in kgs, from all the materials employed [summation of (a x b) for all materials, converted to kgs].

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**IV. Reporting Requirements**

1. The permittee shall notify the Director (appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings and inks in this emissions unit (i.e., for VOC contents). The notification shall include a copy of such record and shall be sent to the Director within 30 days following the end of the calendar month.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the monthly organic HAP usage limitation (for flexographic printing) of 400 kgs .

These quarterly deviation reports shall be submitted in accordance with section A.1.c. of the General Terms and Conditions of this permit.

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**V. Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.1.1. of these terms and conditions shall be determined in accordance with the following method(s):
  - a. Emission Limitations -  
16% VOC by volume of the coating and ink, excluding water and exempt solvents  
  
Applicable Compliance Method -  
The permittee shall demonstrate compliance based upon the record keeping requirements specified in Section A.III.1 of th is permit.  
  
USEPA Method 24 and 24A shall be used to determine the VOC contents for (a)coatings and (b) flexographic printing inks and related coatings, respectively. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 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 24 or 24A.
  - b. Emission Limitation -  
1.55 lbs VOC/hour  
  
Applicable Compliance Method -  
Compliance shall be determined by multiplying the maximum hourly ink/coating usage by the maximum VOC content of all inks and/or coatings employed in this emissions unit.
  - c. Emission Limitation -  
6.79 TPY VOC  
  
Applicable Compliance Method -  
Compliance shall be based upon the record keeping requirements specified in Section A.III.1 of this permit and shall be the sum of the twelve monthly VOC emission rates for the calendar year.
  - d. Emission Limitation -  
400 kgs organic HAP/month

Applicable Compliance Method -  
The permittee shall demonstrate compliance based upon the record keeping requirements specified in Section A.III.2 of this permit.

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VI. **Miscellaneous Requirements**

1. None

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**B. State Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
2. <b>Additional Terms and Conditions</b>			
1.	None		

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None