



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
HAMILTON COUNTY**

CERTIFIED MAIL

Street Address:

122 S. Front Street

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 14-05486

DATE: 10/9/2003

Thermalgraphics
Kevin Kelly
11658 Baen Road
Cincinnati, OH 45242

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

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.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, Ohio 43215

Sincerely,

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

cc: USEPA

HCDES



**Permit To Install
Terms and Conditions**

**Issue Date: 10/9/2003
Effective Date: 10/9/2003**

FINAL PERMIT TO INSTALL 14-05486

Application Number: 14-05486
APS Premise Number: 1431054150
Permit Fee: **\$200**
Name of Facility: Thermalgraphics
Person to Contact: Kevin Kelly
Address: 11658 Baen Road
Cincinnati, OH 45242

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

**11658 Baen Road
Cincinnati, Ohio, Ohio**

Description of proposed emissions unit(s):

Flexographic coating line - including unwind station, 6-station press, direct heat ovens, in-line laminator, and rewind station.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized

representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

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

9. Construction of New Sources(s)

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

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Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

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

10. Public Disclosure

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

11. Applicability

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

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

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

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

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14. Construction Compliance Certification

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	15.3

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 - Six station roll coater with catalytic oxidizer	OAC rule 3745-31-05(A)(3)	79.9 lbs. VOC/day from coatings 37.5 lbs. VOC/day from cleanup materials 15.3 TPY VOC, from coatings and cleanup materials.
		See terms A.2.d, A.2.e, B.1 and B.2.
		The requirements of this rule also include compliance with the requirements of 40 CFR Part 60, Subpart RR.
	OAC rule 3745-21-09(F) and 3745-21-09(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).
	40 CFR Part 60 Subpart RR	The overall VOC emission reduction specified by this rule is less stringent than the overall VOC emission reduction established pursuant to OAC rule 3745-31-05(A)(3).

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Emissions Unit ID: K001

See terms A.2.c and B.3.

2. Additional Terms and Conditions

- 2.a** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the emissions limitations, the use of a catalytic oxidizer with a minimum of 95% destruction efficiency and 100% capture, giving an overall VOC reduction of at least 95%, the total enclosure of the emissions unit, and compliance with the Ohio EPA Air Toxics Policy.
- 2.b** For the pressure and heat seal coatings, the daily and annual emission limitations outlined are based upon the emissions unit's Potential to Emit (PTE). No daily records are required to demonstrate compliance for coatings. Daily and annual records for cleanup material are required.
- 2.c** The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.
- 2.d** The VOC content of each coating employed in this emissions unit shall not exceed 6.47 pounds VOC per gallon, as applied.
- 2.e** The VOC content of each cleanup employed in this emissions unit shall not exceed 7.5 pounds VOC per gallon.

B. Operational Restrictions

- 1. The permittee shall install, operate and maintain a permanent total enclosure with a 100% capture efficiency and a catalytic oxidizer with a minimum control efficiency of 95 %, thus giving an overall control efficiency of 95%.
- 2. The maximum cleanup material usage for this emissions unit shall not exceed 5 gallons per day and 180 gallons of per year.
- 3. The average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emissions test which demonstrated compliance. The average temperature difference across the catalyst bed, at maximum operating capacity, for any 3-hour block of time, shall not be less than 80 percent of the average temperature difference during the most recent emissions test that demonstrated compliance.

4. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than the minimum pressure differential (inches of water) established during the most recent emissions test that demonstrated compliance, whenever the emissions unit is in operation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall install, maintain and operate monitoring devices and a recorder which simultaneously measure and record the pressure inside and outside the permanent total enclosure. The monitoring and recording devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall record and maintain the following information on a daily basis:

- a. The difference in pressure between the permanent total enclosure and the surrounding area(s).
 - b. A log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
2. The permittee shall install, calibrate, maintain, and operate continuous temperature monitors and recorder(s) which measure and record(s) the gas temperature immediately upstream and downstream of the incinerator's catalyst bed when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorder(s) shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information each day:

- a. All 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
- b. All 3-hour blocks of time (when the emissions unit is operating at maximum capacity) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance.

- c. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
3. The permittee shall collect and record the following information each day:
 - a. An identification of the cleanup material employed,
 - b. The amount of each cleanup material employed, in gallons,

- c. The VOC content of the cleanup material employed, in pounds per gallon.
 - d. The daily VOC emissions from cleanup materials employed, (b x c).
4. The permittee shall collect and record the following information each month:
- a. The company identification of each coating material employed in this emissions unit;
 - b. The VOC content of each coating material employed, in pounds per gallon;
 - c. The amount of all coatings employed, in gallons;
 - d. The results of the reference test method specified in 40 CFR 60.446(a) or the manufacturer's formulation data used for determining the VOC content of those coatings.
 - e. The total VOC emissions from all coatings and cleanup materials in pounds or tons.
5. The permit to install for emissions unit K001 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: n-propyl alcohol

TLV (ug/m³): 492,000

Total Maximum Hourly Emission Rate (lbs/hr): 3.01

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m³): 224.5

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³): 11,714

Physical changes to or in the method of operation of the emissions unit after its installation or

Emissions Unit ID: **K001**

modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:
 - a. Construction date (no later than 30 days after such date);
 - b. Anticipated start-up date (not more than 60 days or less than 30 days prior to such date);

- c. Actual start-up date (within 15 days after such date); and
- d. Date of performance testing (if required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency
DAPC - Permit Management Unit
P. O. Box 163669
Columbus, Ohio 43216-3669

and

Department of Environmental Services
250 William Howard Taft Road
Cincinnati, Ohio 45219

- 2. The permittee shall submit pressure differential deviation (excursion) reports that identify all periods of time during which the permanent total enclosure was not maintained at the required differential pressure specified in term B.4.
- 3. The permittee shall submit deviation (excursion) reports that identify all 3-hour blocks of time when the emissions unit was in operation during which the average temperature of the exhaust gases immediately before the catalyst bed or the average temperature difference across the catalyst bed (at maximum capacity) does not comply with the temperature limitations specified in term B.3.
- 4. The permittee shall submit deviation (excursion) reports that identify any day an exceedance occurred for:
 - a. the daily cleanup material emissions limit,
 - b. the VOC content of the coatings and cleanup materials employed,
 - c. the daily cleanup material usage limit, and
 - d. the overall VOC emissions reduction, when the actual emissions reduction was less than the required overall emissions reduction.

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5. Unless otherwise noted in the above terms, the deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.
6. The permittee shall submit annual reports which specify the total volatile organic compound emissions and the cleanup material usage from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

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

- a. Emission Limitation:
VOC: 15.3 TPY, including cleanup material

Applicable Compliance Method:

Although the coating limit is at the emissions unit potential to emit, NSPS Subpart RR requires annual records of the solvent emitted from coatings employed.

Multiply the actual amount of pressure seal coating applied during the year, in gallons/year, by the VOC content in lbs/gallon, as applied, then times the control device efficiency (1-0.95) and dividing by 2000 lb/ton.

Multiply the actual amount of heat seal coating applied during the year, in gallons/year, by the VOC content in lbs/gallon, as applied, then times the control efficiency (1-0.95) and dividing by 2000 lb/ton.

Multiply the gallons of cleanup material employed, by the VOC content in lbs/gallon then dividing by 2000 lb/ton

Sum the actual emissions from pressure seal, heat seal coatings and cleanup materials for the annual emissions.

- b. Emission Limitation:
37.5 lbs. VOC/day for cleanup material

Applicable Compliance Method:

The actual daily emissions rate is determined by multiplying the daily amount of cleanup material employed in gallons per day by the VOC content of the cleanup material in pounds per gallon.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 6 months after startup of the emissions unit.
 - b. The emission testing shall be conducted to demonstrate compliance with the 100% capture efficiency and the 95% control efficiency from the catalytic oxidizer.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): Method 25. Alternative U.S. EPA approved test methods may be used with prior approval from the Hamilton County Department of Environmental Services.

The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Hamilton County Department of Environmental Services.

The capture efficiency shall be determined using Method 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with USEPA's "Guidelines for Determining Capture Efficiency" dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or the approved alternative test protocol (e.g., the mass balance protocol approved on 10/25/95). The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases."

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Hamilton County Department of Environmental Services. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Hamilton County Department of Environmental Services refusal to accept the results of the emission test(s).

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Personnel from the Hamilton County Department of Environmental Services shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Hamilton County Department of Environmental Services within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Hamilton County Department of Environmental Services.

3. USEPA methods 24 and 24A shall be used to determine the VOC content for (a) coatings and (b) flexographic and rotogravure printing lines and related coatings, respectively. If, pursuant to 40 CFR Part 60, Appendix A, an owner or operator 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.
4. Compliance with the usage limitation in term B.2 shall be demonstrated by the record keeping in term C.3.

F. Miscellaneous Requirements

1. None