



1/26/2015

John Edelbrock  
American Inks and Coatings  
575 QUALITY BLVD  
Fairfield, OH 45014

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE  
Facility ID: 1409030956  
Permit Number: P0118148  
Permit Type: Renewal  
County: Butler

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

**How to appeal this permit**

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 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. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
77 South High Street, 17th Floor  
Columbus, OH 43215

Certified Mail

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
No	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

## **How to save money, reduce pollution and reduce energy consumption**

The Ohio EPA is encouraging 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 Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: [www.ohioairquality.org/clean\\_air](http://www.ohioairquality.org/clean_air)

## **How to give us feedback on your permitting experience**

Please complete a survey at [www.epa.ohio.gov/survey.aspx](http://www.epa.ohio.gov/survey.aspx) and give us feedback on your permitting experience. We value your opinion.

## **How to get an electronic copy of your permit**

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Southwest Ohio Air Quality Agency at (513)946-7777 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Erica R. Engel-Ishida, Manager  
Permit Issuance and Data Management Section, DAPC

Cc: SWOAQA



**FINAL**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
American Inks and Coatings**

Facility ID:	1409030956
Permit Number:	P0118148
Permit Type:	Renewal
Issued:	1/26/2015
Effective:	1/26/2015
Expiration:	1/26/2020





**Division of Air Pollution Control**  
**Permit-to-Install and Operate**  
for  
American Inks and Coatings

**Table of Contents**

Authorization .....	1
A. Standard Terms and Conditions .....	6
1. What does this permit-to-install and operate ("PTIO") allow me to do?.....	7
2. Who is responsible for complying with this permit? .....	7
3. What records must I keep under this permit? .....	7
4. What are my permit fees and when do I pay them?.....	7
5. When does my PTIO expire, and when do I need to submit my renewal application? .....	7
6. What happens to this permit if my project is delayed or I do not install or modify my source? .....	8
7. What reports must I submit under this permit? .....	8
8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit? .....	8
9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? ...	8
10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report? .....	9
11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located? .....	9
12. What happens if one or more emissions units operated under this permit is/are shut down permanently? .....	9
13. Can I transfer this permit to a new owner or operator?.....	10
14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"? .....	10
15. What happens if a portion of this permit is determined to be invalid? .....	10
B. Facility-Wide Terms and Conditions.....	11
C. Emissions Unit Terms and Conditions .....	15
1. P001, Extender Tank T-159 .....	16
2. P002, Extender Tank T-160 .....	22
3. P004, Extender Tank T-157 .....	28
4. P006, Extender Tank T-155 .....	34
5. P007, Color Tank T-121 with Mixer .....	40
6. P008, Color Tank T-122 with Mixer .....	45
7. P011, Color Tank T-127 with Mixer .....	50
8. P012, 90 Black Process T-134.....	55
9. P013, Black Tank T-135.....	61



10. P014, Black Packout System T-136 .....	67
11. P015, Black Packout System T-137 .....	72
12. P016, Poly Premix Tank T-144 with Mixer.....	77
13. P022, Newtrol Premix Tank T-131 with Mixer.....	83
14. P023, Newtrol Premix Tank T-104 with Mixer.....	89
15. P028, FSH Mixer MX-106 .....	95
16. P029, FSH Mixer MX-107 .....	101
17. P032, Roto Mixer M-112 .....	107
18. P033, Roto Mixer M-113 .....	113
19. P037, 24 Pump Ink Dispensing System .....	119
20. P040, T-145 Mixer .....	124
21. Emissions Unit Group -P003 and P005 Extender Tanks: T-156 and T-158 .....	129
22. Emissions Unit Group -P009 and P010 Color Tanks: P009,P010.....	135
23. Emissions Unit Group -P017 and P018 Poly Premix Tanks: P017,P018 .....	140
24. Emissions Unit Group -P030 and P031 Bench Mixers: P030,P031, .....	146
25. Emissions Unit Group -P034 - P036 Roto Mixers: P034,P035,P036 .....	152
26. Emissions Unit Group -Shot Mill Systems 4 & 5: P038, P039.....	158



**Final Permit-to-Install and Operate**  
American Inks and Coatings  
**Permit Number:** P0118148  
**Facility ID:** 1409030956  
**Effective Date:** 1/26/2015

## Authorization

Facility ID: 1409030956  
Application Number(s): A0052334  
Permit Number: P0118148  
Permit Description: Renewal FEPTIO for tanks, extruders, mixers and shot mills (emissions units P001 - P018, P022, P023 and P028 - P040).  
Permit Type: Renewal  
Permit Fee: \$0.00  
Issue Date: 1/26/2015  
Effective Date: 1/26/2015  
Expiration Date: 1/26/2020  
Permit Evaluation Report (PER) Annual Date: Apr 1 - Mar 31, Due May 15

This document constitutes issuance to:

American Inks and Coatings  
575 QUALITY BLVD  
Fairfield, OH 45014

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

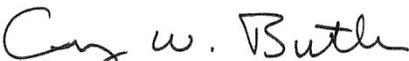
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Southwest Ohio Air Quality Agency  
250 William Howard Taft Rd.  
Cincinnati, OH 45219  
(513)946-7777

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section 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 described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

  
Craig W. Butler  
Director



## Authorization (continued)

Permit Number: P0118148

Permit Description: Renewal FEPTIO for tanks, extruders, mixers and shot mills (emissions units P001 - P018, P022, P023 and P028 - P040).

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

<b>Emissions Unit ID:</b>	<b>P001</b>
Company Equipment ID:	P001 Extender Tank T-159
Superseded Permit Number:	P0105384
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P002</b>
Company Equipment ID:	P002 Extender Tank T-160
Superseded Permit Number:	P0105384
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P004</b>
Company Equipment ID:	P004 Extender Tank T-157
Superseded Permit Number:	P0105384
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P006</b>
Company Equipment ID:	P006 Extender Tank T-155
Superseded Permit Number:	P0105384
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P007</b>
Company Equipment ID:	Color Tank T-121 with Mixer
Superseded Permit Number:	P0105384
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P008</b>
Company Equipment ID:	Color Tank T-122 with Mixer
Superseded Permit Number:	P0105384
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P011</b>
Company Equipment ID:	Color Tank T-127 with Mixer
Superseded Permit Number:	P0105384
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P012</b>
Company Equipment ID:	90 Black Process T-134
Superseded Permit Number:	P0105384
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P013</b>
Company Equipment ID:	Black Tank T-135
Superseded Permit Number:	P0105384
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P014</b>
Company Equipment ID:	Black Packout System T-136
Superseded Permit Number:	P0105384
General Permit Category and Type:	Not Applicable



- Emissions Unit ID:** **P015**  
 Company Equipment ID: Black Packout System T-137  
 Superseded Permit Number: P0105384  
 General Permit Category and Type: Not Applicable
- Emissions Unit ID:** **P016**  
 Company Equipment ID: Poly Premix Tank T-144 with Mixer  
 Superseded Permit Number: P0105384  
 General Permit Category and Type: Not Applicable
- Emissions Unit ID:** **P022**  
 Company Equipment ID: Newtrol Premix Tank T-131 with Mixer  
 Superseded Permit Number: P0105384  
 General Permit Category and Type: Not Applicable
- Emissions Unit ID:** **P023**  
 Company Equipment ID: Newtrol Premix Tank T-104 with Mixer  
 Superseded Permit Number: P0105384  
 General Permit Category and Type: Not Applicable
- Emissions Unit ID:** **P028**  
 Company Equipment ID: FSH Mixer MX-106  
 Superseded Permit Number: P0105384  
 General Permit Category and Type: Not Applicable
- Emissions Unit ID:** **P029**  
 Company Equipment ID: FSH Mixer MX-107  
 Superseded Permit Number: P0105384  
 General Permit Category and Type: Not Applicable
- Emissions Unit ID:** **P032**  
 Company Equipment ID: Roto Mixer M-112  
 Superseded Permit Number: P0105384  
 General Permit Category and Type: Not Applicable
- Emissions Unit ID:** **P033**  
 Company Equipment ID: Roto Mixer M-113  
 Superseded Permit Number: P0105384  
 General Permit Category and Type: Not Applicable
- Emissions Unit ID:** **P037**  
 Company Equipment ID: 24 Pump Ink Dispensing System  
 Superseded Permit Number: P0105384  
 General Permit Category and Type: Not Applicable
- Emissions Unit ID:** **P040**  
 Company Equipment ID: T-145 Mixer  
 Superseded Permit Number: P0105385  
 General Permit Category and Type: Not Applicable

**Group Name: P003 and P005 Extender Tanks**

<b>Emissions Unit ID:</b>	<b>P003</b>
Company Equipment ID:	P003 Extender Tank T-156
Superseded Permit Number:	P0105384
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P005</b>
Company Equipment ID:	P005 Extender Tank T-158
Superseded Permit Number:	P0105384
General Permit Category and Type:	Not Applicable



**Group Name: P009 and P010 Color Tanks**

<b>Emissions Unit ID:</b>	<b>P009</b>
Company Equipment ID:	Color TankT-125 with Mixer
Superseded Permit Number:	P0105384
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P010</b>
Company Equipment ID:	Color T-126 with Mixer
Superseded Permit Number:	P0105384
General Permit Category andType:	Not Applicable

**Group Name: P017 and P018 Poly Premix Tanks**

<b>Emissions Unit ID:</b>	<b>P017</b>
Company Equipment ID:	Poly Premix Tank MX-118 with Mixer
Superseded Permit Number:	P0105384
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P018</b>
Company Equipment ID:	Poly Premix Tank MX-146 with Mixer
Superseded Permit Number:	P0105384
General Permit Category andType:	Not Applicable

**Group Name: P030 and P031 Bench Mixers**

<b>Emissions Unit ID:</b>	<b>P030</b>
Company Equipment ID:	Bench Mixer No. 1
Superseded Permit Number:	P0105384
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P031</b>
Company Equipment ID:	Bench Mixer No. 2
Superseded Permit Number:	P0105384
General Permit Category andType:	Not Applicable

**Group Name: P034 - P036 Roto Mixers**

<b>Emissions Unit ID:</b>	<b>P034</b>
Company Equipment ID:	Roto Mixer M-114
Superseded Permit Number:	P0105384
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P035</b>
Company Equipment ID:	Roto Mixer M-115
Superseded Permit Number:	P0105384
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P036</b>
Company Equipment ID:	Roto Mixer M-116
Superseded Permit Number:	P0105384
General Permit Category andType:	Not Applicable



**Final Permit-to-Install and Operate**  
American Inks and Coatings  
**Permit Number:** P0118148  
**Facility ID:** 1409030956  
**Effective Date:** 1/26/2015

**Group Name: Shot Mill Systems 4 & 5: P038, P**

<b>Emissions Unit ID:</b>	<b>P038</b>
Company Equipment ID:	Shot Mill # 4 System
Superseded Permit Number:	P0105383
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P039</b>
Company Equipment ID:	Shot Mill # 5 System
Superseded Permit Number:	P0105383
General Permit Category andType:	Not Applicable



**Final Permit-to-Install and Operate**  
American Inks and Coatings  
**Permit Number:** P0118148  
**Facility ID:** 1409030956  
**Effective Date:** 1/26/2015

## **A. Standard Terms and Conditions**



**1. What does this permit-to-install and operate ("PTIO") allow me to do?**

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

**2. Who is responsible for complying with this permit?**

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

**3. What records must I keep under this permit?**

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

**4. What are my permit fees and when do I pay them?**

There are two fees associated with permitted air contaminant sources in Ohio:

PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

**5. When does my PTIO expire, and when do I need to submit my renewal application?**

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is



very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

**6. What happens to this permit if my project is delayed or I do not install or modify my source?**

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

**7. What reports must I submit under this permit?**

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

**8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?**

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions of this permit will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

**9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?**

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.



**10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?**

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the [DO/LAA] in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

**11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?**

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

**12. What happens if one or more emissions units operated under this permit is/are shut down permanently?**

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.



**13. Can I transfer this permit to a new owner or operator?**

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

**14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?**

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

**15. What happens if a portion of this permit is determined to be invalid?**

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



**Final Permit-to-Install and Operate**  
American Inks and Coatings  
**Permit Number:** P0118148  
**Facility ID:** 1409030956  
**Effective Date:** 1/26/2015

## **B. Facility-Wide Terms and Conditions**



1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - (1) None.
  - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - (1) 2., 3., 4., and 5.
  
2. The actual emissions of hazardous air pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units P001 (Extender Tank T-159 with Mixer), P002 (Extender Tank T-160 with Mixer), P003 (Extender Tank T-156 with Mixer), P004 (Extender Tank T-157 with Mixer), P005 (Extender Tank T-158 with Mixer), P006 (Extender Tank T-155 with Mixer), P007 (Color Tank T-121 with Mixer), P008 (Color Tank T-122 with Mixer), P009 (Color Tank T-125 with Mixer), P010 (Color Tank T-126 with Mixer), P011 (Color Tank T-127 with Mixer), P012 (90 Black Process Tank T-134 with Mixer), P013 (Black Tank T-135 with Mixer), P014 (Black Packout System T-136), P015 (Black Packout System T-137), P016 (Poly Premix Tank T-144 with Mixer), P017 (Poly Premix Tank MX-118 with Mixer), P018 (Poly Premix Tank MX-146 with Mixer), P022 (Newtrol Premix tank T-131 with Mixer), P023 (Newtrol Premix Tank T-104 with Mixer), P028 (FSH Mixer MX-106), P029 (FSH Mixer MX-107), P030 (Bench Mixer No. 1), P031 (Bench Mixer No. 2), P032 (Roto Mixer M-112), P033 (Roto Mixer M-113), P034 (Roto Mixer M-114), P035 (Roto Mixer M-115), P036 (Roto Mixer M-116), P037 (24 Pump Ink Dispensing System), P038 (Shot Mill System Number 4), P039 (Shot Mill System Number 5), P040 (Poly Premix Tank T-145), any de minimis emissions units as defined in OAC rule 3745-15-05, any registration status and/or permit exempt emissions units pursuant to OAC rule 3745-31-03, or future constructed emissions units, combined, shall not exceed 9.9 tons per year (TPY) for any single HAP, as a rolling, 12-month summation and 24.9 TPY for any combination of HAPs, as a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with this emission limitation upon permit issuance.
  
3. The permittee shall collect and record the following information each month for the emissions units identified in 2. above:
  - a) The name and identification number of each HAP-containing ink produced;
  - b) The individual HAP\* content for each HAP of each HAP-containing ink, in pounds of individual HAP per pound of HAP-containing ink, as produced;
  - c) The total combined HAP content of each HAP-containing ink, in pounds of combined HAPs per pound of HAP-containing ink, as produced [sum all the individual HAP contents from b)];
  - d) The number of pounds of each HAP-containing ink produced;



- e) The name and identification number of each HAP-containing cleanup material employed;
- f) The individual HAP content for each HAP of each HAP-containing cleanup material, in pounds of individual HAP per pound of HAP-containing cleanup material, as applied;
- g) The total combined HAP content of each HAP-containing cleanup material, in pounds of combined HAPs per pound of HAP-containing cleanup material, as applied [sum all the individual HAP contents from f)];
- h) The number of pounds of each HAP-containing cleanup material employed;
- i) The total individual HAP emissions for each HAP from all HAP-containing inks produced and HAP-containing cleanup materials employed, in pounds or tons per month [for each HAP, the sum of b) times d) times (emission factor designated for each emissions unit) for each HAP-containing ink plus the sum of f) times h) times (1 – fraction recovered) for each HAP-containing cleanup materials, and divided by 2,000 pounds per ton, if the units are in tons];
- j) The total combined HAP emissions from all HAP-containing inks produced and HAP-containing cleanup materials employed, in pounds or tons per month [the sum of c) times d) times (emission factor designated for each emissions unit) for each HAP-containing ink plus the sum of g) times h) times (1 – the solvent recovery rate) for each HAP-containing cleanup material, and divided by 2,000 pounds per tons, if the units are in tons];
- k) The updated rolling, 12-month summation of emissions for each individual HAP, in tons. This shall include the information for the current month and the preceding eleven calendar months; and
- l) The updated rolling, 12-month summation of emissions for the total combined HAPs, in 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 Southwest Ohio Air Quality Agency (SWOAQA) contact. This information does not have to be kept on an individual emissions unit basis.

- 4. The permittee shall notify the SWOAQA of any exceedance of the HAP emission limitations outlined in 2. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June, and July through September, respectively).



**Final Permit-to-Install and Operate**

American Inks and Coatings

**Permit Number:** P0118148

**Facility ID:** 1409030956

**Effective Date:** 1/26/2015

5. Emission Limitation:

9.9 TPY for any single HAP and 24.9 TPY for combined HAPs, based on a rolling 12-month summation for the emissions units listed in 2.

Applicable Compliance Method:

Compliance with the HAP emission limitations shall be demonstrated by the record keeping requirements specified in 3.



**Final Permit-to-Install and Operate**  
American Inks and Coatings  
**Permit Number:** P0118148  
**Facility ID:** 1409030956  
**Effective Date:** 1/26/2015

## **C. Emissions Unit Terms and Conditions**



**1. P001, Extender Tank T-159**

**Operations, Property and/or Equipment Description:**

Extender Tank T-159 with Mixer

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. d)(2).
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. b)(1)b., b)(2)b., c)(1), d)(1), e)(1), f)(1)b., f)(3), and f)(4).
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 1.52 pounds per hour and 30.36 pounds per day.  Particulate matter (PM) emissions and particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.05 pound per hour and 0.11 ton per year (TPY).  The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-17-07(A)(1).
b.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V	OC emissions shall not exceed 3.21 TPY, based on a rolling, 12-month summation.  See b)(2)b., c)(1), and Sections B.2., B.3., B.4., and B.5.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-17-07(A)(1)	See b)(2)a.

(2) Additional Terms and Conditions

- a. Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
- b. The maximum OC content for the inks produced in this emissions unit shall not exceed 2 percent by weight.
- c. The hourly and daily emission limitations for OC and the hourly and annual emission limitations for PM-PM10 outlined above are based on the emissions unit's potential to emit (PTE) taking into consideration the batch type nature of the operation. Therefore, no hourly and/or daily records are required to demonstrate compliance with these limits.
- d. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the production limitation, OC content limitation, the use of a scrubber for particulate control, and the HAP, OC and PM/PM10 emissions limitations.

c) Operational Restrictions

- (1) The maximum annual ink production rate for this emissions unit shall not exceed 21,400,000 pounds, based on a rolling, 12-month summation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for this emissions unit:
  - a. The name and identification of each batch of ink produced;
  - b. The OC content for each ink produced, in percent by weight;
  - c. The amount of each ink produced, in pounds;
  - d. The rolling, 12-month summation of the ink production figures, in pounds;
  - e. The OC emissions from each ink produced, in pounds or tons, calculated by multiplying the pounds of ink produced by an emission factor of 0.0003 lb OC/pound of ink produced (AP-42 Table 6.4-1; 5/83);
  - f. The rolling, 12-month summation of the total combined OC emissions from all inks produced, in pounds or tons;





- iv. the rolling, 12-month emission limitation for HAP emissions specified in Section B.2.
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

Organic compound (OC) emissions shall not exceed 1.52 pounds per hour and 30.36 pounds per day.

Applicable Compliance Method:

The hourly and daily emission limitations are based upon the emissions unit's potential to emit. Potential OC emissions were determined based on the following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$OC = (5060 \text{ pounds of ink produced per hour maximum production}) \times (0.0003 \text{ pound of OC per pound of ink produced emissions factor}).$

$OC = (5060 \text{ pounds of ink produced per hour maximum production}) \times (0.0003 \text{ pound of OC per pound of ink produced emissions factor}) \times (20.0 \text{ hours per day maximum hours per day mixing}).$



b. Emission Limitation:

OC emissions shall not exceed 3.21 TPY, based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month OC emission limitation identified in b)(1)b. shall be demonstrated by the record keeping requirement identified in d)(1).

Actual OC emissions for emissions unit P001 shall be determined based on the following equation from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

OC = Sum of [(pounds of ink produced x 0.0003 pound of OC per pound of ink produced emissions factor / 2000 lbs per ton)] for each ink.

c. Emission Limitation:

Particulate matter (PM) emissions and particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.05 pound per hour and 0.11 ton per year (TPY).

Applicable Compliance Method:

The hourly and annual emission limitations are based upon the emissions unit's potential to emit. Potential PM-PM10 emissions were determined based on the following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

PM-PM10 = (5060 pounds of ink produced per hour maximum production) x (50% by weight of ink is pigment) x (2 pounds of particulate per ton of pigment in ink produced emissions factor) x (1 – 98% control efficiency of scrubber) / (2000 pounds per ton).

PM-PM10 = (21,400,000 pounds of ink produced per year maximum allowable production) x (50% by weight of ink is pigment) x (2 pounds of particulate per ton of pigment in ink produced emissions factor) x (1 – 98% control efficiency of scrubber) / (2000 pounds per ton) / (2000 pounds per ton).

- (2) Compliance with the visible emission limitation shall be based on visible particulate emissions testing per OAC rule 3745-17-03(B)(1), (USEPA Method 9, 40 CFR 60, Appendix A).
- (3) Compliance with the percent by weight OC content limit in b)(2)b. shall be determined by the record keeping requirements as specified in d)(1).
- (4) Compliance with the ink production limitation in c)(1) shall be determined by the record keeping requirements as specified in d)(1).



**Final Permit-to-Install and Operate**  
American Inks and Coatings  
**Permit Number:** P0118148  
**Facility ID:** 1409030956  
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g) Miscellaneous Requirements

- (1) None.



**2. P002, Extender Tank T-160**

**Operations, Property and/or Equipment Description:**

Extender Tank T-160 with Mixer

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. d)(2).
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. b)(1)b., b)(2)b., c)(1), d)(1), e)(1), f)(1)b., f)(3), and f)(4).
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 2.02 pounds per hour and 41.55 pounds per day.  Particulate matter (PM) emissions and particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.04 pound per hour and 0.08 ton per year (TPY).  The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-17-07(A)(1).
b.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V	OC emissions shall not exceed 4.20 TPY, based on a rolling, 12-month summation.  See b)(2)b., c)(1), and Sections B.2., B.3., B.4., and B.5.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-17-07(A)(1)	See b)(2)a.

(2) Additional Terms and Conditions

- a. Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
- b. The maximum OC content for the inks produced in this emissions unit shall not exceed 4 percent by weight.
- c. The hourly and daily emission limitations for OC and the hourly and annual emission limitations for PM-PM10 outlined above are based on the emissions unit's potential to emit (PTE) taking into consideration the batch type nature of the operation. Therefore, no daily records are required to demonstrate compliance with these limits.
- d. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the production limitation, OC content limitation, the use of a scrubber for particulate control and the HAP, OC and PM/PM10 emissions limitations.

c) Operational Restrictions

- (1) The maximum annual ink production rate for this emissions unit shall not exceed 14,000,000 pounds, based on a rolling, 12-month summation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for this emissions unit:
  - a. The name and identification of each batch of ink produced;
  - b. The OC content for each ink produced, in percent by weight;
  - c. The amount of each ink produced, in pounds;
  - d. The rolling, 12-month summation of the ink production figures, in pounds;
  - e. The OC emissions from each ink produced, in pounds or tons, calculated by multiplying the pounds of ink produced by an emission factor of 0.0006 lb OC/pound of ink produced (AP-42 Table 6.4-1; 5/83);
  - f. The rolling, 12-month summation of the total combined OC emissions from all inks produced, in pounds or tons;





- iv. the rolling, 12-month emission limitation for HAP emissions specified in Section B.2.
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

Organic compound (OC) emissions shall not exceed 2.02 pounds per hour and 41.55 pounds per day.

Applicable Compliance Method:

The hourly and daily emission limitations are based upon the emissions unit's potential to emit. Potential OC emissions were determined based on the following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$OC = (3367 \text{ pounds of ink produced per hour maximum production}) \times (0.0006 \text{ pound of OC per pound of ink produced emissions factor}).$

$OC = (3367 \text{ pounds of ink produced per hour maximum production}) \times (0.0006 \text{ pound of OC per pound of ink produced emissions factor}) \times (20.6 \text{ hours per day maximum hours per day mixing}).$



b. Emission Limitation:

OC emissions shall not exceed 4.20 TPY, based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month OC emission limitation identified in b)(1)b. shall be demonstrated by the record keeping requirement identified in d)(1).

Actual OC emissions for emissions unit P002 shall be determined based on the following equation from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

OC = Sum of [(pounds of ink produced x 0.0006 pound of OC per pound of ink produced emissions factor / 2000 lbs per ton)] for each ink.

c. Emission Limitation:

Particulate matter (PM) emissions and particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.04 pound per hour and 0.08 ton per year (TPY).

Applicable Compliance Method:

The hourly and annual emission limitations are based upon the emissions unit's potential to emit. Potential PM-PM10 emissions were determined based on the following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

PM-PM10 = (3367 pounds of ink produced per hour maximum production) x (60% by weight of ink is pigment) x (2 pounds of particulate per ton of pigment in ink produced emissions factor) x (1 - 98% control efficiency of scrubber) / (2000 pounds per ton).

PM-PM10 = (14,000,000 pounds of ink produced per year maximum allowable production) x (60% by weight of ink is pigment) x (2 pounds of particulate per ton of pigment in ink produced emissions factor) x (1 - 98% control efficiency of scrubber) / (2000 pounds per ton) / (2000 pounds per ton).

- (2) Compliance with the visible emission limitation shall be based on visible particulate emissions testing per OAC rule 3745-17-03(B)(1), (USEPA Method 9, 40 CFR 60, Appendix A).
- (3) Compliance with the percent by weight OC content limit in b)(2)b. shall be determined by the record keeping requirements as specified in d)(1).
- (4) Compliance with the ink production limitation in c)(1) shall be determined by the record keeping requirements as specified in d)(1).



**Final Permit-to-Install and Operate**  
American Inks and Coatings  
**Permit Number:** P0118148  
**Facility ID:** 1409030956  
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g) Miscellaneous Requirements

(1) None.



**3. P004, Extender Tank T-157**

**Operations, Property and/or Equipment Description:**

Extender Tank T-157 with Mixer

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. d)(2).
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. b)(2)c., b)(2)d., c)(1), d)(1), e)(1), f)(1)b., f)(3), and f)(4).
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 0.82 pound per hour and 16.76 pounds per day. Particulate matter (PM) emissions and particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.01 pound per hour and 0.01 ton per year (TPY).  The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-17-07(A)(1).
b.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V	See b)(2)c., b)(2)d., c)(1), and Sections B.2., B.3., B.4., and B.5.
c.	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-07(A)(1)	See b)(2)b.

(2) Additional Terms and Conditions

- a. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of tight-fitting covers, production limitation, OC content limitation, the use of a scrubber for particulate control and compliance with the HAP, OC and PM/PM10 emissions limitations.
- b. Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
- c. The maximum OC content for the inks produced in this emissions unit shall not exceed 10 percent by weight.
- d. The combined annual organic compound (OC) emissions from emissions units P003, P004, and P005 shall not exceed 8.63 tons per year (TPY), based on a rolling, 12-month summation.
- e. The hourly and daily emission limitations for OC and the hourly and annual emission limitations for PM-PM10 outlined above are based on the emissions unit's potential to emit (PTE) taking into consideration the batch type nature of the operation. Therefore, no daily records are required to demonstrate compliance with these limits.

c) Operational Restrictions

- (1) The maximum annual ink production rate for emissions units P003, P004, and P005, combined, shall not exceed 15,000,000 pounds, based on a rolling, 12-month summation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for emissions units P003, P004, and P005, combined:
  - a. The name and identification of each batch of ink produced;
  - b. The OC content for each ink produced, in percent by weight;
  - c. The amount of each ink produced, in pounds;
  - d. The rolling, 12-month summation of the ink production figures, in pounds;
  - e. The OC emissions from each ink produced, in pounds or tons, calculated by multiplying the pounds of ink produced by an emission factor of 0.00115 lb OC/pound of ink produced (NAPIM Table 3-3; 3/96);



- f. The rolling, 12-month summation of the total combined OC emissions from all inks produced, in pounds or tons;
  - g. The amount of pigments (non-volatiles/solids) employed in tons; and
  - h. The PM-PM10 emissions, in pounds or tons, calculated by multiplying the tons of pigments (non-volatiles/solids) employed by an emission factor of 2 pounds PM-PM10/ton pigment (AP-42 Table 6.7-1; 5/83) and by a scrubber control efficiency of (1-.98).
- (2) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified FEPTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new FEPTIO.
- e) Reporting Requirements
- (1) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
    - i. the rolling, 12-month emission limitation for OC emissions specified in b)(2)d.;
    - ii. the OC content limitation specified in b)(2)c.;



- iii. the rolling, 12-month production limitation specified in c)(1); and
- iv. the rolling, 12-month emission limitation for HAP emissions specified in Section B.2.
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

Organic compound (OC) emissions shall not exceed 0.82 pounds per hour and 16.76 pounds per day.

Applicable Compliance Method:

The hourly and daily emission limitations are based upon the emissions unit's potential to emit. Potential OC emissions were determined based on the following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$OC = (708 \text{ pounds of ink produced per hour maximum production}) \times (0.00115 \text{ pound of OC per pound of ink produced emissions factor}).$

$OC = (708 \text{ pounds of ink produced per hour maximum production}) \times (0.00115 \text{ pound of OC per pound of ink produced emissions factor}) \times (20.6 \text{ hours per day maximum hours per day mixing}).$



b. Emission Limitation:

The combined annual organic compound (OC) emissions from emissions units P003, P004, and P005 shall not exceed 8.63 tons per year (TPY), based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month OC emission limitation identified in b)(2)d. shall be demonstrated by the record keeping requirement identified in d)(1).

Actual OC emissions for emissions units P003, P004, and P005 shall be determined based on the following equation from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

OC = Sum of [(pounds of ink produced x 0.00115 pound of OC per pound of ink produced emissions factor / 2000 lbs per ton)] for each ink, and for each emissions unit.

c. Emission Limitation:

Particulate matter (PM) emissions and particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.01 pound per hour and 0.01 ton per year (TPY).

Applicable Compliance Method:

The hourly and annual emission limitations are based upon the emissions unit's potential to emit. Potential PM-PM10 emissions were determined based on the following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

PM-PM10 = (708 pounds of ink produced per hour maximum production) x (50% by weight of ink is pigment) x (2 pounds of particulate per ton of pigment in ink produced emissions factor) x (1 - 98% control efficiency of scrubber) / (2000 pounds per ton).

PM-PM10 = (2,100,000 pounds of ink produced per year maximum production) x (50% by weight of ink is pigment) x (2 pounds of particulate per ton of pigment in ink produced emissions factor) x (1 - 98% control efficiency of scrubber) / (2000 pounds per ton) / (2000 pounds per ton).

- (2) Compliance with the visible emission limitation shall be based on visible particulate emissions testing per OAC rule 3745-17-03(B)(1), (USEPA Method 9, 40 CFR 60, Appendix A).
- (3) Compliance with the percent by weight OC content limit in b)(2)c. shall be determined by the record keeping requirements as specified in d)(1).
- (4) Compliance with the ink production limitation in c)(1) shall be determined by the record keeping requirements as specified in d)(1).



**Final Permit-to-Install and Operate**  
American Inks and Coatings  
**Permit Number:** P0118148  
**Facility ID:** 1409030956  
**Effective Date:** 1/26/2015

g) Miscellaneous Requirements

- (1) None.



**4. P006, Extender Tank T-155**

**Operations, Property and/or Equipment Description:**

Extender Tank T-155 with Mixer

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. d)(2).
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. b)(1)b., b)(2)b., c)(1), d)(1), e)(1), f)(1)b., f)(3), and f)(4).
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 3.65 pounds per hour and 75.09 pounds per day.  Particulate matter (PM) emissions and particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.01 pound per hour and 0.02 ton per year (TPY).  The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-17-07(A)(1).
b.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V	OC emissions shall not exceed 5.08 TPY, based on a rolling, 12-month summation.  See b)(2)b., c)(1), and Sections B.2., B.3., B.4., and B.5.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-17-07(A)(1)	See b)(2)a.

(2) Additional Terms and Conditions

- a. Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
- b. The maximum OC content for the inks produced in this emissions unit shall not exceed 20 percent by weight.
- c. The hourly and daily emission limitations for OC and the hourly and annual emission limitations for PM-PM10 outlined above are based on the emissions unit's potential to emit (PTE) taking into consideration the batch type nature of the operation. Therefore, no daily records are required to demonstrate compliance with these limits.
- d. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the production limitation, OC content limitation, the use of a scrubber for particulate control, and the HAP, OC and PM/PM10 emissions limitations.

c) Operational Restrictions

- (1) The maximum annual ink production rate for this emissions unit shall not exceed 3,386,667 pounds, based on a rolling, 12-month summation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for this emissions unit:
  - a. The name and identification of each batch of ink produced;
  - b. The OC content for each ink produced, in percent by weight;
  - c. The amount of each ink produced, in pounds;
  - d. The rolling, 12-month summation of the ink production figures, in pounds;
  - e. The OC emissions from each ink produced, in pounds or tons, calculated by multiplying the pounds of ink produced by an emission factor of 0.003 lb OC/pound of ink produced (AP-42 Table 6.4-1; 5/83);
  - f. The rolling, 12-month summation of the total combined OC emissions from all inks produced, in pounds or tons;





- iv. the rolling, 12-month emission limitation for HAP emissions specified in Section B.2.
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) **Testing Requirements**

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. **Emission Limitation:**

Organic compound (OC) emissions shall not exceed 3.65 pounds per hour and 75.09 pounds per day.

**Applicable Compliance Method:**

The hourly and daily emission limitations are based upon the emissions unit's potential to emit. Potential OC emissions were determined based on the following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$OC = (1217 \text{ pounds of ink produced per hour maximum production}) \times (0.003 \text{ pound of OC per pound of ink produced emissions factor}).$

$OC = (1217 \text{ pounds of ink produced per hour maximum production}) \times (0.003 \text{ pound of OC per pound of ink produced emissions factor}) \times (20.6 \text{ hours per day maximum hours per day mixing}).$



b. Emission Limitation:

OC emissions shall not exceed 5.08 TPY, based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month OC emission limitation identified in b)(1)b. shall be demonstrated by the record keeping requirement identified in d)(1).

Actual OC emissions for emissions unit P006 shall be determined based on the following equation from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

OC = Sum of [(pounds of ink produced x 0.003 pound of OC per pound of ink produced emissions factor / 2000 lbs per ton)] for each ink.

c. Emission Limitation:

Particulate matter (PM) emissions and particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.01 pound per hour and 0.02 ton per year (TPY).

Applicable Compliance Method:

The hourly and annual emission limitations are based upon the emissions unit's potential to emit. Potential PM-PM10 emissions were determined based on the following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

PM-PM10 = (1217 pounds of ink produced per hour maximum production) x (50% by weight of ink is pigment) x (2 pounds of particulate per ton of pigment in ink produced emissions factor) x (1 - 98% control efficiency of scrubber) / (2000 pounds per ton).

PM-PM10 = (3,386,667 pounds of ink produced per year maximum production) x (50% by weight of ink is pigment) x (2 pounds of particulate per ton of pigment in ink produced emissions factor) x (1 - 98% control efficiency of scrubber) / (2000 pounds per ton) / (2000 pounds per ton).

- (2) Compliance with the visible emission limitation shall be based on visible particulate emissions testing per OAC rule 3745-17-03(B)(1), (USEPA Method 9, 40 CFR 60, Appendix A).
- (3) Compliance with the percent by weight OC content limit in b)(2)b. shall be determined by the record keeping requirements as specified in d)(1).
- (4) Compliance with the ink production limitation in c)(1) shall be determined by the record keeping requirements as specified in d)(1).



**Final Permit-to-Install and Operate**  
American Inks and Coatings  
**Permit Number:** P0118148  
**Facility ID:** 1409030956  
**Effective Date:** 1/26/2015

g) Miscellaneous Requirements

(1) None.



**5. P007, Color Tank T-121 with Mixer**

**Operations, Property and/or Equipment Description:**

Color Tank T-121 with Mixer

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. d)(2).
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. b)(2)a., b)(2)c., c)(1), d)(1), e)(1), f)(1)b., f)(2), and f)(3).
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 1.47 pounds per hour and 30.53 pounds per day.  The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V	See b)(2)a., b)(2)c., c)(1), and Sections B.2., B.3., B.4., and B.5.

- (2) Additional Terms and Conditions
  - a. The maximum OC content for the inks produced in this emissions unit shall not exceed 4 percent by weight.
  - b. The hourly and daily emission limitations for OC outlined above are based on the emissions unit's potential to emit (PTE) taking into consideration the batch type nature of the operation. Therefore, no daily records are required to demonstrate compliance with these limits.



- c. The combined annual organic compound (OC) emissions from emissions units P007 and P008 shall not exceed 5.10 tons per year (TPY), based on a rolling, 12-month summation.
  - d. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the production limitation, OC content limitation, and the HAP and OC emissions limitations.
- c) Operational Restrictions
- (1) The maximum annual ink production rate for emissions units P007 and P008 shall not exceed 17,000,000 pounds, based on a rolling, 12-month summation.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall collect and record the following information each month for emissions units P007 and P008, combined:
    - a. The name and identification of each batch of ink produced;
    - b. The OC content for each ink produced, in percent by weight;
    - c. The amount of each ink produced, in pounds;
    - d. The rolling, 12-month summation of the ink production figures, in pounds;
    - e. The OC emissions from each ink produced, in pounds or tons, calculated by multiplying the pounds of ink produced by an emission factor of 0.0006 lb OC/pound of ink produced (AP-42 Table 6.4-1; 5/83); and
    - f. The rolling, 12-month summation of the total combined OC emissions from all inks produced, in pounds or tons.
  - (2) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified FEPTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new FEPTIO.
- e) Reporting Requirements
- (1) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the



document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
    - i. the rolling, 12-month emission limitation for OC emissions specified in b)(2)c.;
    - ii. the OC content limitation specified in b)(2)a.;
    - iii. the rolling, 12-month production limitation specified in c)(1); and
    - iv. the rolling, 12-month emission limitation for HAP emissions specified in Section B.2.
  - b. the probable cause of each deviation (excursion);
  - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
  - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.



f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Organic compound (OC) emissions shall not exceed 1.47 pounds per hour and 30.53 pounds per day.

Applicable Compliance Method:

The hourly and daily emission limitations are based upon the emissions unit's potential to emit. Potential OC emissions were determined based on the following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$OC = (2446 \text{ pounds of ink produced per hour maximum production}) \times (0.0006 \text{ pound of OC per pound of ink produced emissions factor})$ .

$OC = (2446 \text{ pounds of ink produced per hour maximum production}) \times (0.0006 \text{ pound of OC per pound of ink produced emissions factor}) \times (20.8 \text{ hours per day maximum hours per day mixing})$ .

b. Emission Limitation:

The combined annual organic compound (OC) emissions from emissions units P007 and P008 shall not exceed 5.10 tons per year (TPY), based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month OC emission limitation identified in b)(2)c. shall be demonstrated by the record keeping requirement identified in d)(1).

Actual OC emissions for emissions units P007 and P008 shall be determined based on the following equation from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$OC = \text{Sum of } [(pounds \text{ of ink produced} \times 0.0006 \text{ pound of OC per pound of ink produced emissions factor} / 2000 \text{ lbs per ton})]$  for each ink, and for each emissions unit.

(2) Compliance with the percent by weight OC content limit in b)(2)a. shall be determined by the record keeping requirements as specified in d)(1).

(3) Compliance with the ink production limitation in c)(1) shall be determined by the record keeping requirements as specified in d)(1).



**Final Permit-to-Install and Operate**  
American Inks and Coatings  
**Permit Number:** P0118148  
**Facility ID:** 1409030956  
**Effective Date:** 1/26/2015

g) Miscellaneous Requirements

(1) None.



**6. P008, Color Tank T-122 with Mixer**

**Operations, Property and/or Equipment Description:**

Color Tank T-122 with Mixer

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. d)(2).
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. b)(2)a., b)(2)c., c)(1), d)(1), e)(1), f)(1)b., f)(2), and f)(3).
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 1.67 pounds per hour and 36.00 pounds per day.  The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V	See b)(2)a., b)(2)c., c)(1), and Sections B.2., B.3., B.4., and B.5.

- (2) Additional Terms and Conditions
  - a. The maximum OC content for the inks produced in this emissions unit shall not exceed 4 percent by weight.
  - b. The hourly and daily emission limitations for OC outlined above are based on the emissions unit's potential to emit (PTE) taking into consideration the batch type nature of the operation. Therefore, no daily records are required to demonstrate compliance with these limits.



- c. The combined annual organic compound (OC) emissions from emissions units P007 and P008 shall not exceed 5.10 tons per year (TPY), based on a rolling, 12-month summation.
  - d. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the production limitation, OC content limitation, and the HAP and OC emissions limitations.
- c) Operational Restrictions
- (1) The maximum annual ink production rate for emissions units P007 and P008 shall not exceed 17,000,000 pounds, based on a rolling, 12-month summation.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall collect and record the following information each month for emissions units P007 and P008, combined:
    - a. The name and identification of each batch of ink produced;
    - b. The OC content for each ink produced, in percent by weight;
    - c. The amount of each ink produced, in pounds;
    - d. The rolling, 12-month summation of the ink production figures, in pounds;
    - e. The OC emissions from each ink produced, in pounds or tons, calculated by multiplying the pounds of ink produced by an emission factor of 0.0006 lb OC/pound of ink produced (AP-42 Table 6.4-1; 5/83); and
    - f. The rolling, 12-month summation of the total combined OC emissions from all inks produced, in pounds or tons.
  - (2) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified FEPTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new FEPTIO.
- e) Reporting Requirements
- (1) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the



document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
    - i. the rolling, 12-month emission limitation for OC emissions specified in b)(2)c.;
    - ii. the OC content limitation specified in b)(2)a.;
    - iii. the rolling, 12-month production limitation specified in c)(1); and
    - iv. the rolling, 12-month emission limitation for HAP emissions specified in Section B.2.
  - b. the probable cause of each deviation (excursion);
  - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
  - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.



f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Organic compound (OC) emissions shall not exceed 1.67 pounds per hour and 36.00 pounds per day.

Applicable Compliance Method:

The hourly and daily emission limitations are based upon the emissions unit's potential to emit. Potential OC emissions were determined based on the following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$OC = (2778 \text{ pounds of ink produced per hour maximum production}) \times (0.0006 \text{ pound of OC per pound of ink produced emissions factor})$ .

$OC = (2778 \text{ pounds of ink produced per hour maximum production}) \times (0.0006 \text{ pound of OC per pound of ink produced emissions factor}) \times (21.6 \text{ hours per day maximum hours per day mixing})$ .

b. Emission Limitation:

The combined annual organic compound (OC) emissions from emissions units P007 and P008 shall not exceed 5.10 tons per year (TPY), based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month OC emission limitation identified in b)(2)c. shall be demonstrated by the record keeping requirement identified in d)(1).

Actual OC emissions for emissions units P007 and P008 shall be determined based on the following equation from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$OC = \text{Sum of } [(pounds \text{ of ink produced} \times 0.0006 \text{ pound of OC per pound of ink produced emissions factor} / 2000 \text{ lbs per ton)] \text{ for each ink, and for each emissions unit.}$

(2) Compliance with the percent by weight OC content limit in b)(2)a. shall be determined by the record keeping requirements as specified in d)(1).

(3) Compliance with the ink production limitation in c)(1) shall be determined by the record keeping requirements as specified in d)(1).



**Final Permit-to-Install and Operate**  
American Inks and Coatings  
**Permit Number:** P0118148  
**Facility ID:** 1409030956  
**Effective Date:** 1/26/2015

g) Miscellaneous Requirements

(1) None.



**7. P011, Color Tank T-127 with Mixer**

**Operations, Property and/or Equipment Description:**

Color Tank T-127 with Mixer

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. d)(2).

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(2)b., b)(2)d., c)(1), d)(1), e)(1), f)(1)b., f)(2), and f)(3).

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 2.01 pounds per hour and 38.64 pounds per day.  The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V	See b)(2)b., b)(2)d., c)(1), and Sections B.2., B.3., B.4., and B.5.

(2) Additional Terms and Conditions

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

b. The maximum OC content for the inks produced in this emissions unit shall not exceed 10 percent by weight.



**Final Permit-to-Install and Operate**

American Inks and Coatings

**Permit Number:** P0118148

**Facility ID:** 1409030956

**Effective Date:** 1/26/2015

- c. The hourly and daily emission limitations for OC outlined above are based on the emissions unit's potential to emit (PTE) taking into consideration the batch type nature of the operation. Therefore, no daily records are required to demonstrate compliance with these limits.
  - d. The combined annual organic compound (OC) emissions from emissions units P009, P010, and P011 shall not exceed 8.05 tons per year (TPY), based on a rolling, 12-month summation.
- c) Operational Restrictions
- (1) The maximum annual ink production rate for emissions units P009, P010, and P011 shall not exceed 14,000,000 pounds, based on a rolling, 12-month summation.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall collect and record the following information each month for emissions units P009, P010, and P011, combined:
    - a. The name and identification of each batch of ink produced;
    - b. The OC content for each ink produced, in percent by weight;
    - c. The amount of each ink produced, in pounds;
    - d. The rolling, 12-month summation of the ink production figures, in pounds;
    - e. The OC emissions from each ink produced, in pounds or tons, calculated by multiplying the pounds of ink produced by an emission factor of 0.00115 lb OC/pound of ink produced (NAPIM Table 3-3; 3/96); and
    - f. The rolling, 12-month summation of the total combined OC emissions from all inks produced, in pounds or tons.
  - (2) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified FEPTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new FEPTIO.
- e) Reporting Requirements
- (1) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard



copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
    - i. the rolling, 12-month emission limitation for OC emissions specified in b)(2)d.;
    - ii. the OC content limitation specified in b)(2)b.;
    - iii. the rolling, 12-month production limitation specified in c)(1); and
    - iv. the rolling, 12-month emission limitation for HAP emissions specified in Section B.2.
  - b. the probable cause of each deviation (excursion);
  - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
  - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.



f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Organic compound (OC) emissions shall not exceed 2.01 pounds per hour and 38.64 pounds per day.

Applicable Compliance Method:

The hourly and daily emission limitations are based upon the emissions unit's potential to emit. Potential OC emissions were determined based on the following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$OC = (1750 \text{ pounds of ink produced per hour maximum production}) \times (0.00115 \text{ pound of OC per pound of ink produced emissions factor})$ .

$OC = (1750 \text{ pounds of ink produced per hour maximum production}) \times (0.00115 \text{ pound of OC per pound of ink produced emissions factor}) \times (19.2 \text{ hours per day maximum hours per day mixing})$ .

b. Emission Limitation:

The combined annual organic compound (OC) emissions from emissions units P009, P010, and P011 shall not exceed 8.05 tons per year (TPY), based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month OC emission limitation identified in b)(2)d. shall be demonstrated by the record keeping requirement identified in d)(1).

Actual OC emissions for emissions units P009, P010, and P011 shall be determined based on the following equation from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$OC = \text{Sum of } [(pounds \text{ of ink produced} \times 0.00115 \text{ pound of OC per pound of ink produced emissions factor} / 2000 \text{ lbs per ton})]$  for each ink, and for each emissions unit.

(2) Compliance with the percent by weight OC content limit in b)(2)b. shall be determined by the record keeping requirements as specified in d)(1).

(3) Compliance with the ink production limitation in c)(1) shall be determined by the record keeping requirements as specified in d)(1).



**Final Permit-to-Install and Operate**  
American Inks and Coatings  
**Permit Number:** P0118148  
**Facility ID:** 1409030956  
**Effective Date:** 1/26/2015

g) Miscellaneous Requirements

(1) None.



**8. P012, 90 Black Process T-134**

**Operations, Property and/or Equipment Description:**

90 Black Process Tank T-134 with Mixer

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. d)(2).
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. b)(2)c., b)(2)e., c)(1), d)(1), e)(1), f)(1)b., f)(3), and f)(4).
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 2.76 pounds per hour and 55.20 pounds per day. Particulate matter (PM) emissions and particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.02 pound per hour and 0.02 ton per year (TPY).  The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-17-07(A)(1).
b.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V	See b)(2)c., b)(2)e., c)(1), and Sections B.2., B.3., B.4., and B.5.
c.	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-07(A)(1)	See b)(2)b.

(2) Additional Terms and Conditions

- a. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the production limitation, OC content limitation, the use of a scrubber for particulate control, and the HAP, OC and PM/PM10 emissions limitations.
- b. Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
- c. The maximum OC content for the inks produced in this emissions unit shall not exceed 4 percent by weight.
- d. The hourly and daily emission limitations for OC and the hourly and annual emission limitations for PM-PM10 outlined above are based on the emissions unit's potential to emit (PTE) taking into consideration the batch type nature of the operation. Therefore, no daily records are required to demonstrate compliance with these limits.
- e. The combined annual organic compound (OC) emissions from emissions units P012 and P013, combined, shall not exceed 5.40 tons per year (TPY), based on a rolling, 12-month summation.

c) Operational Restrictions

- (1) The maximum annual ink production rate for emissions units P012 and P013 shall not exceed 18,000,000 pounds, based on a rolling, 12-month summation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for emissions units P012 and P013, combined:
  - a. The name and identification of each batch of ink produced;
  - b. The OC content for each ink produced, in percent by weight;
  - c. The amount of each ink produced, in pounds;
  - d. The rolling, 12-month summation of the ink production figures, in pounds;
  - e. The OC emissions from each ink produced, in pounds or tons, calculated by multiplying the pounds of ink produced by an emission factor of 0.0006 lb OC/pound of ink produced (AP-42 Table 6.4-1; 5/83);
  - f. The rolling, 12-month summation of the total combined OC emissions from all inks produced, in pounds or tons;





- iv. the rolling, 12-month emission limitation for HAP emissions specified in Section B.2.
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

Organic compound (OC) emissions shall not exceed 2.76 pounds per hour and 55.20 pounds per day.

Applicable Compliance Method:

The hourly and daily emission limitations are based upon the emissions unit's potential to emit. Potential OC emissions were determined based on the following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$OC = (4600 \text{ pounds of ink produced per hour maximum production}) \times (0.0006 \text{ pound of OC per pound of ink produced emissions factor}).$

$OC = (4600 \text{ pounds of ink produced per hour maximum production}) \times (0.0006 \text{ pound of OC per pound of ink produced emissions factor}) \times (20.0 \text{ hours per day maximum hours per day mixing}).$



b. Emission Limitation:

The combined annual organic compound (OC) emissions from emissions units P012 and P013, combined, shall not exceed 5.40 tons per year (TPY), based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month OC emission limitation identified in b)(2)e. shall be demonstrated by the record keeping requirement identified in d)(1).

Actual OC emissions for emissions units P012 and P013 shall be determined based on the following equation from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

OC = Sum of [(pounds of ink produced x 0.0006 pound of OC per pound of ink produced emissions factor / 2000 lbs per ton)] for each ink, and for each emissions unit.

c. Emission Limitation:

Particulate matter (PM) emissions and particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.02 pound per hour and 0.02 ton per year (TPY).

Applicable Compliance Method:

The hourly and annual emission limitations are based upon the emissions unit's potential to emit. Potential PM-PM10 emissions were determined based on the following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

PM-PM10 = (4600 pounds of ink produced per hour maximum production) x (22% by weight of ink is pigment) x (2 pounds of particulate per ton of pigment in ink produced emissions factor) x (1 – 98% control efficiency of scrubber) / (2000 pounds per ton).

PM-PM10 = (9,600,000 pounds of ink produced per year maximum production) x (22% by weight of ink is pigment) x (2 pounds of particulate per ton of pigment in ink produced emissions factor) x (1 – 98% control efficiency of scrubber) / (2000 pounds per ton) / (2000 pounds per ton).

- (2) Compliance with the visible emission limitation shall be based on visible particulate emissions testing per OAC rule 3745-17-03(B)(1), (USEPA Method 9, 40 CFR 60, Appendix A).
- (3) Compliance with the percent by weight OC content limit in b)(2)c. shall be determined by the record keeping requirements as specified in d)(1).
- (4) Compliance with the ink production limitation in c)(1) shall be determined by the record keeping requirements as specified in d)(1).



**Final Permit-to-Install and Operate**  
American Inks and Coatings  
**Permit Number:** P0118148  
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g) Miscellaneous Requirements

(1) None.



**9. P013, Black Tank T-135**

**Operations, Property and/or Equipment Description:**

Black Tank T-135 with Mixer

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. d)(2)
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. b)(2)c., b)(2)e., c)(1), d)(1), e)(1), f)(1)b., f)(3), and f)(4).
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 2.00 pounds per hour and 41.14 pounds per day. Particulate matter (PM) emissions and particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.01 pound per hour and 0.02 ton per year (TPY).  The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-17-07(A)(1).
b.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V	See b)(2)c., b)(2)e., c)(1), and Sections B.2., B.3., B.4., and B.5.
c.	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-07(A)(1)	See b)(2)b.

(2) Additional Terms and Conditions

- a. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the production limitation, OC content limitation, the use of a scrubber for particulate control, and the HAP, OC and PM/PM10 emissions limitations.
- b. Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
- c. The maximum OC content for the inks produced in this emissions unit shall not exceed 4 percent by weight.
- d. The hourly and daily emission limitations for OC and the hourly and annual emission limitations for PM-PM10 outlined above are based on the emissions unit's potential to emit (PTE) taking into consideration the batch type nature of the operation. Therefore, no daily records are required to demonstrate compliance with these limits.
- e. The combined annual organic compound (OC) emissions from emissions units P012 and P013, combined, shall not exceed 5.40 tons per year (TPY), based on a rolling, 12-month summation.

c) Operational Restrictions

- (1) The maximum annual ink production rate for emissions units P012 and P013 shall not exceed 18,000,000 pounds, based on a rolling, 12-month summation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for emissions units P012 and P013, combined:
  - a. The name and identification of each batch of ink produced;
  - b. The OC content for each ink produced, in percent by weight;
  - c. The amount of each ink produced, in pounds;
  - d. The rolling, 12-month summation of the ink production figures, in pounds;
  - e. The OC emissions from each ink produced, in pounds or tons, calculated by multiplying the pounds of ink produced by an emission factor of 0.0006 lb OC/pound of ink produced (AP-42 Table 6.4-1; 5/83);
  - f. The rolling, 12-month summation of the total combined OC emissions from all inks produced, in pounds or tons;





- iv. the rolling, 12-month emission limitation for HAP emissions specified in Section B.2.
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) **Testing Requirements**

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. **Emission Limitation:**

Organic compound (OC) emissions shall not exceed 2.00 pounds per hour and 41.14 pounds per day.

**Applicable Compliance Method:**

The hourly and daily emission limitations are based upon the emissions unit's potential to emit. Potential OC emissions were determined based on the following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$OC = (3333 \text{ pounds of ink produced per hour maximum production}) \times (0.0006 \text{ pound of OC per pound of ink produced emissions factor}).$

$OC = (3333 \text{ pounds of ink produced per hour maximum production}) \times (0.0006 \text{ pound of OC per pound of ink produced emissions factor}) \times (20.6 \text{ hours per day maximum hours per day mixing}).$



b. Emission Limitation:

The combined annual organic compound (OC) emissions from emissions units P012 and P013, combined, shall not exceed 5.40 tons per year (TPY), based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month OC emission limitation identified in b)(2)e. shall be demonstrated by the record keeping requirement identified in d)(1).

Actual OC emissions for emissions units P012 and P013 shall be determined based on the following equation from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

OC = Sum of [(pounds of ink produced x 0.0006 pound of OC per pound of ink produced emissions factor / 2000 lbs per ton)] for each ink, and for each emissions unit.

c. Emission Limitation:

Particulate matter (PM) emissions and particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.01 pound per hour and 0.02 ton per year (TPY).

Applicable Compliance Method:

The hourly and annual emission limitations are based upon the emissions unit's potential to emit. Potential PM-PM10 emissions were determined based on the following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

PM-PM10 = (3333 pounds of ink produced per hour maximum production) x (22% by weight of ink is pigment) x (2 pounds of particulate per ton of pigment in ink produced emissions factor) x (1 – 98% control efficiency of scrubber) / (2000 pounds per ton).

PM-PM10 = (8,400,000 pounds of ink produced per year maximum production) x (22% by weight of ink is pigment) x (2 pounds of particulate per ton of pigment in ink produced emissions factor) x (1 – 98% control efficiency of scrubber) / (2000 pounds per ton) / (2000 pounds per ton).

- (2) Compliance with the visible emission limitation shall be based on visible particulate emissions testing per OAC rule 3745-17-03(B)(1), (USEPA Method 9, 40 CFR 60, Appendix A).
- (3) Compliance with the percent by weight OC content limit in b)(2)c. shall be determined by the record keeping requirements as specified in d)(1).
- (4) Compliance with the ink production limitation in c)(1) shall be determined by the record keeping requirements as specified in d)(1).



**Final Permit-to-Install and Operate**  
American Inks and Coatings  
**Permit Number:** P0118148  
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g) Miscellaneous Requirements

- (1) None.



**10. P014, Black Packout System T-136**

**Operations, Property and/or Equipment Description:**

Black Packout System T-136

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. d)(2).
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. b)(2)a., b)(2)c., c)(1), d)(1), e)(1), f)(1)b., f)(2), and f)(3).
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 2.70 pounds per hour and 64.80 pounds per day.  The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V	See b)(2)a., b)(2)c., c)(1), and Sections B.2., B.3., B.4., and B.5.

- (2) Additional Terms and Conditions
  - a. The maximum OC content for the inks produced in this emissions unit shall not exceed 4 percent by weight.
  - b. The hourly and daily emission limitations for OC outlined above are based on the emissions unit's potential to emit (PTE) taking into consideration the batch type nature of the operation. Therefore, no daily records are required to demonstrate compliance with these limits.



- c. The combined annual organic compound (OC) emissions from emissions units P014 and P015 shall not exceed 5.40 tons per year (TPY), based on a rolling, 12-month summation.
  - d. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the production limitation, OC content limitation, and the HAP and OC emissions limitations.
- c) Operational Restrictions
- (1) The maximum annual ink production rate for emissions units P014 and P015 shall not exceed 18,000,000 pounds, based on a rolling, 12-month summation.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall collect and record the following information each month for emissions units P014 and P015, combined:
    - a. The name and identification of each batch of ink produced;
    - b. The OC content for each ink produced, in percent by weight;
    - c. The amount of each ink produced, in pounds;
    - d. The rolling, 12-month summation of the ink production figures, in pounds;
    - e. The OC emissions from each ink produced, in pounds or tons, calculated by multiplying the pounds of ink produced by an emission factor of 0.0006 lb OC/pound of ink produced (AP-42 Table 6.4-1; 5/83); and
    - f. The rolling, 12-month summation of the total combined OC emissions from all inks produced, in pounds or tons.
  - (2) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified FEPTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new FEPTIO.
- e) Reporting Requirements
- (1) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the



document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
    - i. the rolling, 12-month emission limitation for OC emissions specified in b)(2)c.;
    - ii. the OC content limitation specified in b)(2)a.;
    - iii. the rolling, 12-month production limitation specified in c)(1); and
    - iv. the rolling, 12-month emission limitation for HAP emissions specified in Section B.2.
  - b. the probable cause of each deviation (excursion);
  - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
  - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.



f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Organic compound (OC) emissions shall not exceed 2.70 pounds per hour and 64.80 pounds per day.

Applicable Compliance Method:

The hourly and daily emission limitations are based upon the emissions unit's potential to emit. Potential OC emissions were determined based on the following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$OC = (4500 \text{ pounds of ink produced per hour maximum production}) \times (0.0006 \text{ pound of OC per pound of ink produced emissions factor})$ .

$OC = (4500 \text{ pounds of ink produced per hour maximum production}) \times (0.0006 \text{ pound of OC per pound of ink produced emissions factor}) \times (24 \text{ hours per day maximum hours per day mixing})$ .

b. Emission Limitation:

The combined annual organic compound (OC) emissions from emissions units P014 and P015 shall not exceed 5.40 tons per year (TPY), based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month OC emission limitation identified in b)(2)c. shall be demonstrated by the record keeping requirement identified in d)(1).

Actual OC emissions for emissions units P014 and P015 shall be determined based on the following equation from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$OC = \text{Sum of } [(pounds \text{ of ink produced} \times 0.0006 \text{ pound of OC per pound of ink produced emissions factor} / 2000 \text{ lbs per ton})]$  for each ink, and for each emissions unit.

(2) Compliance with the percent by weight OC content limit in b)(2)a. shall be determined by the record keeping requirements as specified in d)(1).

(3) Compliance with the ink production limitation in c)(1) shall be determined by the record keeping requirements as specified in d)(1).



**Final Permit-to-Install and Operate**  
American Inks and Coatings  
**Permit Number:** P0118148  
**Facility ID:** 1409030956  
**Effective Date:** 1/26/2015

g) Miscellaneous Requirements

(1) None.



**11. P015, Black Packout System T-137**

**Operations, Property and/or Equipment Description:**

Black Packout System T-137

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. d)(2).
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. b)(2)a., b)(2)c., c)(1), d)(1), e)(1), f)(1)b., f)(2), and f)(3).
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 2.70 pounds per hour and 38.70 pounds per day.  The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V	See b)(2)a., b)(2)c., c)(1), and Sections B.2., B.3., B.4., and B.5.

- (2) Additional Terms and Conditions
  - a. The maximum OC content for the inks produced in this emissions unit shall not exceed 4 percent by weight.
  - b. The hourly and daily emission limitations for OC outlined above are based on the emissions unit's potential to emit (PTE) taking into consideration the batch type nature of the operation. Therefore, no daily records are required to demonstrate compliance with these limits.



**Final Permit-to-Install and Operate**

American Inks and Coatings

**Permit Number:** P0118148

**Facility ID:** 1409030956

**Effective Date:** 1/26/2015

- c. The combined annual organic compound (OC) emissions from emissions units P014 and P015 shall not exceed 5.40 tons per year (TPY), based on a rolling, 12-month summation.
  - d. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the production limitation, OC content limitation, and the HAP and OC emissions limitations.
- c) Operational Restrictions
- (1) The maximum annual ink production rate for emissions units P014 and P015 shall not exceed 18,000,000 pounds, based on a rolling, 12-month summation.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall collect and record the following information each month for emissions units P014 and P015, combined:
    - a. The name and identification of each batch of ink produced;
    - b. The OC content for each ink produced, in percent by weight;
    - c. The amount of each ink produced, in pounds;
    - d. The rolling, 12-month summation of the ink production figures, in pounds;
    - e. The OC emissions from each ink produced, in pounds or tons, calculated by multiplying the pounds of ink produced by an emission factor of 0.0006 lb OC/pound of ink produced (AP-42 Table 6.4-1; 5/83); and
    - f. The rolling, 12-month summation of the total combined OC emissions from all inks produced, in pounds or tons.
  - (2) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified FEPTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new FEPTIO.
- e) Reporting Requirements
- (1) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the



document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
    - i. the rolling, 12-month emission limitation for OC emissions specified in b)(2)c.;
    - ii. the OC content limitation specified in b)(2)a.;
    - iii. the rolling, 12-month production limitation specified in c)(1); and
    - iv. the rolling, 12-month emission limitation for HAP emissions specified in Section B.2.
  - b. the probable cause of each deviation (excursion);
  - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
  - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.



f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Organic compound (OC) emissions shall not exceed 2.70 pounds per hour and 38.70 pounds per day.

Applicable Compliance Method:

The hourly and daily emission limitations are based upon the emissions unit's potential to emit. Potential OC emissions were determined based on the following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$OC = (4500 \text{ pounds of ink produced per hour maximum production}) \times (0.0006 \text{ pound of OC per pound of ink produced emissions factor})$ .

$OC = (4500 \text{ pounds of ink produced per hour maximum production}) \times (0.0006 \text{ pound of OC per pound of ink produced emissions factor}) \times (14.3 \text{ hours per day maximum hours per day mixing})$ .

b. Emission Limitation:

The combined annual organic compound (OC) emissions from emissions units P014 and P015 shall not exceed 5.40 tons per year (TPY), based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month OC emission limitation identified in b)(2)c. shall be demonstrated by the record keeping requirement identified in d)(1).

Actual OC emissions for emissions units P014 and P015 shall be determined based on the following equation from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$OC = \text{Sum of } [(pounds \text{ of ink produced} \times 0.0006 \text{ pound of OC per pound of ink produced emissions factor} / 2000 \text{ lbs per ton})]$  for each ink, and for each emissions unit.

(2) Compliance with the percent by weight OC content limit in b)(2)a. shall be determined by the record keeping requirements as specified in d)(1).

(3) Compliance with the ink production limitation in c)(1) shall be determined by the record keeping requirements as specified in d)(1).



**Final Permit-to-Install and Operate**  
American Inks and Coatings  
**Permit Number:** P0118148  
**Facility ID:** 1409030956  
**Effective Date:** 1/26/2015

g) Miscellaneous Requirements

(1) None.



**12. P016, Poly Premix Tank T-144 with Mixer**

**Operations, Property and/or Equipment Description:**

Poly Premix Tank T-144 with Mixer

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. d)(2).
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. b)(2)b., b)(2)d., c)(1), d)(1), e)(1), f)(1)b., f)(3), and f)(4).
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 0.98 pound per hour and 21.60 pounds per day. Particulate matter (PM) emissions and particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.01 pound per hour and 0.01 ton per year (TPY).  The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-17-07(A)(1).
b.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V	See b)(2)b., b)(2)d., c)(1), and Sections B.2., B.3., B.4., and B.5.
c.	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-07(A)(1)	See b)(2)a.

(2) Additional Terms and Conditions

- a. Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
- b. The maximum OC content for the inks produced in this emissions unit shall not exceed 20 percent by weight.
- c. The hourly and daily emission limitations for OC and the hourly and annual emission limitations for PM-PM10 outlined above are based on the emissions unit's potential to emit (PTE) taking into consideration the batch type nature of the operation. Therefore, no daily records are required to demonstrate compliance with these limits.
- d. The combined annual organic compound (OC) emissions from emissions units P016, P017, and P018, combined, shall not exceed 7.50 tons per year (TPY), based on a rolling, 12-month summation.
- e. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the production limitation, OC content limitation, the use of a scrubber for particulate control, and the HAP, OC and PM/PM10 emissions limitations.

c) Operational Restrictions

- (1) The maximum annual ink production rate for emissions units P016, P017, and P018 shall not exceed 5,000,000 pounds, based on a rolling, 12-month summation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for emissions units P016, P017, and P018, combined:
  - a. The name and identification of each batch of ink produced;
  - b. The OC content for each ink produced, in percent by weight;
  - c. The amount of each ink produced, in pounds;
  - d. The rolling, 12-month summation of the ink production figures, in pounds;
  - e. The OC emissions from each ink produced, in pounds or tons, calculated by multiplying the pounds of ink produced by an emission factor of 0.003 lb OC/pound of ink produced (AP-42 Table 6.4-1; 5/83);
  - f. The rolling, 12-month summation of the total combined OC emissions from all inks produced, in pounds or tons;





- iv. the rolling, 12-month emission limitation for HAP emissions specified in Section B.2.
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

Organic compound (OC) emissions shall not exceed 0.98 pound per hour and 21.60 pounds per day.

Applicable Compliance Method:

The hourly and daily emission limitations are based upon the emissions unit's potential to emit. Potential OC emissions were determined based on the following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$OC = (327 \text{ pounds of ink produced per hour maximum production}) \times (0.003 \text{ pound of OC per pound of ink produced emissions factor}).$

$OC = (327 \text{ pounds of ink produced per hour maximum production}) \times (0.003 \text{ pound of OC per pound of ink produced emissions factor}) \times (22.0 \text{ hours per day maximum hours per day mixing}).$



b. Emission Limitation:

The combined annual organic compound (OC) emissions from emissions units P016, P017, and P018, combined, shall not exceed 7.50 tons per year (TPY), based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month OC emission limitation identified in b)(2)d. shall be demonstrated by the record keeping requirement identified in d)(1).

Actual OC emissions for emissions units P016, P017, P018, and P018 shall be determined based on the following equation from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

OC = Sum of [(pounds of ink produced x 0.003 pound of OC per pound of ink produced emissions factor / 2000 lbs per ton)] for each ink, and for each emissions unit.

c. Emission Limitation:

Particulate matter (PM) emissions and particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.01 pound per hour and 0.01 ton per year (TPY).

Applicable Compliance Method:

The hourly and annual emission limitations are based upon the emissions unit's potential to emit. Potential PM-PM10 emissions were determined based on the following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

PM-PM10 = (327 pounds of ink produced per hour maximum production) x (20% by weight of ink is pigment) x (2 pounds of particulate per ton of pigment in ink produced emissions factor) x (1 - 98% control efficiency of scrubber) / (2000 pounds per ton).

PM-PM10 = (1,100,000 pounds of ink produced per year maximum production) x (20% by weight of ink is pigment) x (2 pounds of particulate per ton of pigment in ink produced emissions factor) x (1 - 98% control efficiency of scrubber) / (2000 pounds per ton) / (2000 pounds per ton).

- (2) Compliance with the visible emission limitation shall be based on visible particulate emissions testing per OAC rule 3745-17-03(B)(1), (USEPA Method 9, 40 CFR 60, Appendix A).
- (3) Compliance with the percent by weight OC content limit in b)(2)b. shall be determined by the record keeping requirements as specified in d)(1).
- (4) Compliance with the ink production limitation in c)(1) shall be determined by the record keeping requirements as specified in d)(1).



**Final Permit-to-Install and Operate**  
American Inks and Coatings  
**Permit Number:** P0118148  
**Facility ID:** 1409030956  
**Effective Date:** 1/26/2015

g) Miscellaneous Requirements

(1) None.



**13. P022, Newtrol Premix Tank T-131 with Mixer**

**Operations, Property and/or Equipment Description:**

Newtrol Premix Tank T-131 with Mixer

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. d)(2).
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. b)(2)b., b)(2)d., c)(1), d)(1), e)(1), f)(1)b., f)(3), and f)(4).
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 0.25 pound per hour and 4.22 pounds per day. Particulate matter (PM) emissions and particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.01 pound per hour and 0.01 ton per year (TPY).  The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-17-07(A)(1).
b.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V	See b)(2)b., b)(2)d., c)(1), and Sections B.2., B.3., B.4., and B.5.
c.	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-07(A)(1)	See b)(2)a.

(2) Additional Terms and Conditions

- a. Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
- b. The maximum OC content for the inks produced in this emissions unit shall not exceed 4 percent by weight.
- c. The hourly and daily emission limitations for OC and the hourly and annual emission limitations for PM-PM10 outlined above are based on the emissions unit's potential to emit (PTE) taking into consideration the batch type nature of the operation. Therefore, no daily records are required to demonstrate compliance with these limits.
- d. The combined annual organic compound (OC) emissions from emissions units P022, and P023, combined, shall not exceed 1.20 tons per year (TPY), based on a rolling, 12-month summation.
- e. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the production limitation, OC content limitation, the use of a scrubber for particulate control, and the HAP, OC and PM/PM10 emissions limitations.

c) Operational Restrictions

- (1) The maximum annual ink production rate for emissions units P022, and P023 shall not exceed 4,000,000 pounds, based on a rolling, 12-month summation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for emissions units P022, and P023, combined:
  - a. The name and identification of each batch of ink produced;
  - b. The OC content for each ink produced, in percent by weight;
  - c. The amount of each ink produced, in pounds;
  - d. The rolling, 12-month summation of the ink production figures, in pounds;
  - e. The OC emissions from each ink produced, in pounds or tons, calculated by multiplying the pounds of ink produced by an emission factor of 0.0006 lb OC/pound of ink produced (AP-42 Table 6.4-1; 5/83);
  - f. The rolling, 12-month summation of the total combined OC emissions from all inks produced, in pounds or tons;





- iv. the rolling, 12-month emission limitation for HAP emissions specified in Section B.2.
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

Organic compound (OC) emissions shall not exceed 0.25 pound per hour and 4.22 pounds per day.

Applicable Compliance Method:

The hourly and daily emission limitations are based upon the emissions unit's potential to emit. Potential OC emissions were determined based on the following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

OC = (410 pounds of ink produced per hour maximum production) x (0.0006 pound of OC per pound of ink produced emissions factor).

OC = (410 pounds of ink produced per hour maximum production) x (0.0006 pound of OC per pound of ink produced emissions factor) x (17.1 hours per day maximum hours per day mixing).



b. Emission Limitation:

The combined annual organic compound (OC) emissions from emissions units P022, and P023, combined, shall not exceed 1.20 tons per year (TPY), based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month OC emission limitation identified in b)(2)d. shall be demonstrated by the record keeping requirement identified in d)(1).

Actual OC emissions for emissions units P022, and P023 shall be determined based on the following equation from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

OC = Sum of [(pounds of ink produced x 0.0006 pound of OC per pound of ink produced emissions factor / 2000 lbs per ton)] for each ink, and for each emissions unit.

c. Emission Limitation:

Particulate matter (PM) emissions and particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.01 pound per hour and 0.01 ton per year (TPY).

Applicable Compliance Method:

The hourly and annual emission limitations are based upon the emissions unit's potential to emit. Potential PM-PM10 emissions were determined based on the following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

PM-PM10 = (410 pounds of ink produced per hour maximum production) x (50% by weight of ink is pigment) x (2 pounds of particulate per ton of pigment in ink produced emissions factor) x (1 - 98% control efficiency of scrubber) / (2000 pounds per ton).

PM-PM10 = (1,900,000 pounds of ink produced per year maximum production) x (50% by weight of ink is pigment) x (2 pounds of particulate per ton of pigment in ink produced emissions factor) x (1 - 98% control efficiency of scrubber) / (2000 pounds per ton) / (2000 pounds per ton).

- (2) Compliance with the visible emission limitation shall be based on visible particulate emissions testing per OAC rule 3745-17-03(B)(1), (USEPA Method 9, 40 CFR 60, Appendix A).
- (3) Compliance with the percent by weight OC content limit in b)(2)b. shall be determined by the record keeping requirements as specified in d)(1).
- (4) Compliance with the ink production limitation in c)(1) shall be determined by the record keeping requirements as specified in d)(1).



**Final Permit-to-Install and Operate**  
American Inks and Coatings  
**Permit Number:** P0118148  
**Facility ID:** 1409030956  
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g) Miscellaneous Requirements

(1) None



**14. P023, Newtrol Premix Tank T-104 with Mixer**

**Operations, Property and/or Equipment Description:**

Newtrol Premix Tank T-104 with Mixer

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. d)(2).
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. b)(2)b., b)(2)d., c)(1), d)(1), e)(1), f)(1)b., f)(3), and f)(4).
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 0.12 pound per hour and 2.47 pounds per day. Particulate matter (PM) emissions and particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.01 pound per hour and 0.01 ton per year (TPY).  The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-17-07(A)(1).
b.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V	See b)(2)b., b)(2)d., c)(1), and Sections B.2., B.3., B.4., and B.5.
c.	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-07(A)(1)	See b)(2)a.

(2) Additional Terms and Conditions

- a. Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
- b. The maximum OC content for the inks produced in this emissions unit shall not exceed 4 percent by weight.
- c. The hourly and daily emission limitations for OC and the hourly and annual emission limitations for PM-PM10 outlined above are based on the emissions unit's potential to emit (PTE) taking into consideration the batch type nature of the operation. Therefore, no daily records are required to demonstrate compliance with these limits.
- d. The combined annual organic compound (OC) emissions from emissions units P022, and P023, combined, shall not exceed 1.20 tons per year (TPY), based on a rolling, 12-month summation.
- e. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the production limitation, OC content limitation, the use of a scrubber for particulate control, and the HAP, OC and PM/PM10 emissions limitations.

c) Operational Restrictions

- (1) The maximum annual ink production rate for emissions units P022, and P023 shall not exceed 4,000,000 pounds, based on a rolling, 12-month summation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for emissions units P022, and P023, combined:
  - a. The name and identification of each batch of ink produced;
  - b. The OC content for each ink produced, in percent by weight;
  - c. The amount of each ink produced, in pounds;
  - d. The rolling, 12-month summation of the ink production figures, in pounds;
  - e. The OC emissions from each ink produced, in pounds or tons, calculated by multiplying the pounds of ink produced by an emission factor of 0.0006 lb OC/pound of ink produced (AP-42 Table 6.4-1; 5/83);
  - f. The rolling, 12-month summation of the total combined OC emissions from all inks produced, in pounds or tons;





- iv. the rolling, 12-month emission limitation for HAP emissions specified in Section B.2.
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) **Testing Requirements**

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. **Emission Limitation:**

Organic compound (OC) emissions shall not exceed 0.12 pound per hour and 2.47 pounds per day.

**Applicable Compliance Method:**

The hourly and daily emission limitations are based upon the emissions unit's potential to emit. Potential OC emissions were determined based on the following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

OC = (200 pounds of ink produced per hour maximum production) x (0.0006 pound of OC per pound of ink produced emissions factor).

OC = (200 pounds of ink produced per hour maximum production) x (0.0006 pound of OC per pound of ink produced emissions factor) x (20.6 hours per day maximum hours per day mixing).



b. Emission Limitation:

The combined annual organic compound (OC) emissions from emissions units P022, and P023, combined, shall not exceed 1.20 tons per year (TPY), based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month OC emission limitation identified in b)(2)d. shall be demonstrated by the record keeping requirement identified in d)(1).

Actual OC emissions for emissions units P022, and P023 shall be determined based on the following equation from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

OC = Sum of [(pounds of ink produced x 0.0006 pound of OC per pound of ink produced emissions factor / 2000 lbs per ton)] for each ink, and for each emissions unit.

c. Emission Limitation:

Particulate matter (PM) emissions and particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.01 pound per hour and 0.01 ton per year (TPY).

Applicable Compliance Method:

The hourly and annual emission limitations are based upon the emissions unit's potential to emit. Potential PM-PM10 emissions were determined based on the following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

PM-PM10 = (200 pounds of ink produced per hour maximum production) x (50% by weight of ink is pigment) x (2 pounds of particulate per ton of pigment in ink produced emissions factor) x (1 - 98% control efficiency of scrubber) / (2000 pounds per ton).

PM-PM10 = (600,000 pounds of ink produced per year maximum production) x (50% by weight of ink is pigment) x (2 pounds of particulate per ton of pigment in ink produced emissions factor) x (1 - 98% control efficiency of scrubber) / (2000 pounds per ton) / (2000 pounds per ton).

- (2) Compliance with the visible emission limitation shall be based on visible particulate emissions testing per OAC rule 3745-17-03(B)(1), (USEPA Method 9, 40 CFR 60, Appendix A).
- (3) Compliance with the percent by weight OC content limit in b)(2)b. shall be determined by the record keeping requirements as specified in d)(1).
- (4) Compliance with the ink production limitation in c)(1) shall be determined by the record keeping requirements as specified in d)(1).



**Final Permit-to-Install and Operate**  
American Inks and Coatings  
**Permit Number:** P0118148  
**Facility ID:** 1409030956  
**Effective Date:** 1/26/2015

g) Miscellaneous Requirements

(1) None.



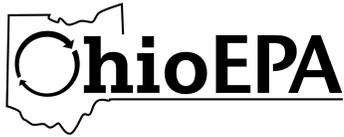
**15. P028, FSH Mixer MX-106**

**Operations, Property and/or Equipment Description:**

FSH Mixer MX-106

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. d)(2).
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. b)(2)b., b)(2)d., c)(1), d)(1), e)(1), f)(1)b., f)(3), and f)(4).
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 1.50 pounds per hour and 25.71 pounds per day. Particulate matter (PM) emissions and particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.01 pound per hour and 0.01 ton per year (TPY).  The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-17-07(A)(1).
b.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V	See b)(2)b., b)(2)d., c)(1), and Sections B.2., B.3., B.4., and B.5.
c.	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-07(A)(1)	See b)(2)a.

(2) Additional Terms and Conditions

- a. Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
- b. The maximum OC content for the inks produced in this emissions unit shall not exceed 50 percent by weight.
- c. The hourly and daily emission limitations for OC and the hourly and annual emission limitations for PM-PM10 outlined above are based on the emissions unit's potential to emit (PTE) taking into consideration the batch type nature of the operation. Therefore, no daily records are required to demonstrate compliance with these limits.
- d. The combined annual organic compound (OC) emissions from emissions units P028, P029, P030, and P031, combined, shall not exceed 2.25 tons per year (TPY), based on a rolling, 12-month summation.
- e. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the production limitation, OC content limitation, the use of a scrubber for particulate control, and the HAP, OC and PM/PM10 emissions limitations.

c) Operational Restrictions

- (1) The maximum annual ink production rate for emissions units P028, P029, P030, and P031 shall not exceed 600,000 pounds, based on a rolling, 12-month summation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for emissions units P028, P029, P030, and P031, combined:
  - a. The name and identification of each batch of ink produced;
  - b. The OC content for each ink produced, in percent by weight;
  - c. The amount of each ink produced, in pounds;
  - d. The rolling, 12-month summation of the ink production figures, in pounds;
  - e. The OC emissions from each ink produced, in pounds or tons, calculated by multiplying the pounds of ink produced by an emission factor of 0.0075 lb OC/pound of ink produced (AP-42 Table 6.4-1; 5/83);
  - f. The rolling, 12-month summation of the total combined OC emissions from all inks produced, in pounds or tons;





- iv. the rolling, 12-month emission limitation for HAP emissions specified in Section B.2.
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) **Testing Requirements**

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. **Emission Limitation:**

Organic compound (OC) emissions shall not exceed 1.50 pounds per hour and 25.71 pounds per day.

**Applicable Compliance Method:**

The hourly and daily emission limitations are based upon the emissions unit's potential to emit. Potential OC emissions were determined based on the following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$OC = (200 \text{ pounds of ink produced per hour maximum production}) \times (0.0075 \text{ pound of OC per pound of ink produced emissions factor}).$

$OC = (200 \text{ pounds of ink produced per hour maximum production}) \times (0.0075 \text{ pound of OC per pound of ink produced emissions factor}) \times (17.1 \text{ hours per day maximum hours per day mixing}).$



b. Emission Limitation:

The combined annual organic compound (OC) emissions from emissions units P028, P029, P030, and P031, combined, shall not exceed 2.25 tons per year (TPY), based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month OC emission limitation identified in b)(2)d. shall be demonstrated by the record keeping requirement identified in d)(1).

Actual OC emissions for emissions units P028, P029, P030, and P031 shall be determined based on the following equation from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

OC = Sum of [(pounds of ink produced x 0.0075 pound of OC per pound of ink produced emissions factor / 2000 lbs per ton)] for each ink, and for each emissions unit.

c. Emission Limitation:

Particulate matter (PM) emissions and particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.01 pound per hour and 0.01 ton per year (TPY).

Applicable Compliance Method:

The hourly and annual emission limitations are based upon the emissions unit's potential to emit. Potential PM-PM10 emissions were determined based on the following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

PM-PM10 = (200 pounds of ink produced per hour maximum production) x (30% by weight of ink is pigment) x (2 pounds of particulate per ton of pigment in ink produced emissions factor) x (1 - 98% control efficiency of scrubber) / (2000 pounds per ton).

PM-PM10 = (200,000 pounds of ink produced per year maximum production) x (30% by weight of ink is pigment) x (2 pounds of particulate per ton of pigment in ink produced emissions factor) x (1 - 98% control efficiency of scrubber) / (2000 pounds per ton) / (2000 pounds per ton).

- (2) Compliance with the visible emission limitation shall be based on visible particulate emissions testing per OAC rule 3745-17-03(B)(1), (USEPA Method 9, 40 CFR 60, Appendix A).
- (3) Compliance with the percent by weight OC content limit in b)(2)b. shall be determined by the record keeping requirements as specified in d)(1).
- (4) Compliance with the ink production limitation in c)(1) shall be determined by the record keeping requirements as specified in d)(1).



**Final Permit-to-Install and Operate**  
American Inks and Coatings  
**Permit Number:** P0118148  
**Facility ID:** 1409030956  
**Effective Date:** 1/26/2015

g) Miscellaneous Requirements

(1) None.



**16. P029, FSH Mixer MX-107**

**Operations, Property and/or Equipment Description:**

FSH Mixer MX-107

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. d)(2).
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. b)(2)b., b)(2)d., c)(1), d)(1), e)(1), f)(1)b., f)(3), and f)(4).
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 1.20 pounds per hour and 20.57 pounds per day. Particulate matter (PM) emissions and particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.01 pound per hour and 0.01 ton per year (TPY).  The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-17-07(A)(1).
b.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V	See b)(2)b., b)(2)d., c)(1), and Sections B.2., B.3., B.4., and B.5.
c.	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-07(A)(1)	See b)(2)a.

(2) Additional Terms and Conditions

- a. Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
- b. The maximum OC content for the inks produced in this emissions unit shall not exceed 50 percent by weight.
- c. The hourly and daily emission limitations for OC and the hourly and annual emission limitations for PM-PM10 outlined above are based on the emissions unit's potential to emit (PTE) taking into consideration the batch type nature of the operation. Therefore, no daily records are required to demonstrate compliance with these limits.
- d. The combined annual organic compound (OC) emissions from emissions units P028, P029, P030, and P031, combined, shall not exceed 2.25 tons per year (TPY), based on a rolling, 12-month summation.
- e. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the production limitation, OC content limitation, the use of a scrubber for particulate control, and the HAP, OC and PM/PM10 emissions limitations.

c) Operational Restrictions

- (1) The maximum annual ink production rate for emissions units P028, P029, P030, and P031 shall not exceed 600,000 pounds, based on a rolling, 12-month summation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for emissions units P028, P029, P030, and P031, combined:
  - a. The name and identification of each batch of ink produced;
  - b. The OC content for each ink produced, in percent by weight;
  - c. The amount of each ink produced, in pounds;
  - d. The rolling, 12-month summation of the ink production figures, in pounds;
  - e. The OC emissions from each ink produced, in pounds or tons, calculated by multiplying the pounds of ink produced by an emission factor of 0.0075 lb OC/pound of ink produced (AP-42 Table 6.4-1; 5/83);
  - f. The rolling, 12-month summation of the total combined OC emissions from all inks produced, in pounds or tons;





- iv. the rolling, 12-month emission limitation for HAP emissions specified in Section B.2.
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

Organic compound (OC) emissions shall not exceed 1.20 pounds per hour and 20.57 pounds per day.

Applicable Compliance Method:

The hourly and daily emission limitations are based upon the emissions unit's potential to emit. Potential OC emissions were determined based on the following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$OC = (160 \text{ pounds of ink produced per hour maximum production}) \times (0.0075 \text{ pound of OC per pound of ink produced emissions factor}).$

$OC = (160 \text{ pounds of ink produced per hour maximum production}) \times (0.0075 \text{ pound of OC per pound of ink produced emissions factor}) \times (17.1 \text{ hours per day maximum hours per day mixing}).$



b. Emission Limitation:

The combined annual organic compound (OC) emissions from emissions units P028, P029, P030, and P031, combined, shall not exceed 2.25 tons per year (TPY), based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month OC emission limitation identified in b)(2)d. shall be demonstrated by the record keeping requirement identified in d)(1).

Actual OC emissions for emissions units P028, P029, P030, and P031 shall be determined based on the following equation from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

OC = Sum of [(pounds of ink produced x 0.0075 pound of OC per pound of ink produced emissions factor / 2000 lbs per ton)] for each ink, and for each emissions unit.

c. Emission Limitation:

Particulate matter (PM) emissions and particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.01 pound per hour and 0.01 ton per year (TPY).

Applicable Compliance Method:

The hourly and annual emission limitations are based upon the emissions unit's potential to emit. Potential PM-PM10 emissions were determined based on the following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

PM-PM10 = (160 pounds of ink produced per hour maximum production) x (30% by weight of ink is pigment) x (2 pounds of particulate per ton of pigment in ink produced emissions factor) x (1 - 98% control efficiency of scrubber) / (2000 pounds per ton).

PM-PM10 = (200,000 pounds of ink produced per year maximum production) x (30% by weight of ink is pigment) x (2 pounds of particulate per ton of pigment in ink produced emissions factor) x (1 - 98% control efficiency of scrubber) / (2000 pounds per ton) / (2000 pounds per ton).

- (2) Compliance with the visible emission limitation shall be based on visible particulate emissions testing per OAC rule 3745-17-03(B)(1), (USEPA Method 9, 40 CFR 60, Appendix A).
- (3) Compliance with the percent by weight OC content limit in b)(2)b. shall be determined by the record keeping requirements as specified in d)(1).
- (4) Compliance with the ink production limitation in c)(1) shall be determined by the record keeping requirements as specified in d)(1).



**Final Permit-to-Install and Operate**  
American Inks and Coatings  
**Permit Number:** P0118148  
**Facility ID:** 1409030956  
**Effective Date:** 1/26/2015

g) Miscellaneous Requirements

(1) None.



**17. P032, Roto Mixer M-112**

**Operations, Property and/or Equipment Description:**

Roto Mixer M-112

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. d)(2).
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. b)(1)b., b)(2)b., c)(1), d)(1), e)(1), f)(1)b., f)(3), and f)(4).
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 1.85 pounds per hour and 26.65 pounds per day. Particulate matter (PM) emissions and particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.01 pound per hour and 0.01 ton per year (TPY).  The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-17-07(A)(1).
b.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V	Organic compound (OC) emissions shall not exceed 0.31 ton per year (TPY), based on a rolling, 12-month summation.  See b)(2)b., c)(1), and Sections B.2., B.3., B.4., and B.5.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-17-07(A)(1)	See b)(2)a.

(2) Additional Terms and Conditions

- a. Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
- b. The maximum OC content for the inks produced in this emissions unit shall not exceed 80 percent by weight.
- c. The hourly and daily emission limitations for OC and the hourly and annual emission limitations for PM-PM10 outlined above are based on the emissions unit's potential to emit (PTE) taking into consideration the batch type nature of the operation. Therefore, no daily records are required to demonstrate compliance with these limits.
- d. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the production limitation, OC content limitation, the use of a scrubber for particulate control, and the HAP, OC and PM/PM10 emissions limitations.

c) Operational Restrictions

- (1) The maximum annual ink production rate for this emissions unit shall not exceed 100,000 pounds, based on a rolling, 12-month summation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for this emissions unit:
  - a. The name and identification of each batch of ink produced;
  - b. The OC content for each ink produced, in percent by weight;
  - c. The amount of each ink produced, in pounds;
  - d. The rolling, 12-month summation of the ink production figures, in pounds;
  - e. The OC emissions from each ink produced, in pounds or tons, calculated by multiplying the pounds of ink produced by an emission factor of 0.00617 lb OC/pound of ink produced (NAPIM table 3-3; 3/96);
  - f. The rolling, 12-month summation of the total combined OC emissions from all inks produced, in pounds or tons;





- iv. the rolling, 12-month emission limitation for HAP emissions specified in Section B.2.
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
- (2) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following methods:

a. Emission Limitation:

Organic compound (OC) emissions shall not exceed 1.85 pounds per hour and 26.65 pounds per day.

Applicable Compliance Method:

The hourly and daily emission limitations are based upon the emissions unit's potential to emit. Potential OC emissions were determined based on the following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$OC = (300 \text{ pounds of ink produced per hour maximum production}) \times (0.00617 \text{ pound of OC per pound of ink produced emissions factor}).$

$OC = (300 \text{ pounds of ink produced per hour maximum production}) \times (0.00617 \text{ pound of OC per pound of ink produced emissions factor}) \times (14.4 \text{ hours per day maximum hours per day mixing}).$



b. Emission Limitation:

The annual organic compound (OC) emissions from this emissions unit shall not exceed 0.31 ton per year (TPY), based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month OC emission limitation identified in b)(1)b. shall be demonstrated by the record keeping requirement identified in d)(1).

Actual OC emissions for emissions unit P032 shall be determined based on the following equation from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

OC = Sum of [(pounds of ink produced x 0.00617 pound of OC per pound of ink produced emissions factor / 2000 lbs per ton)] for each ink, and for each emissions unit.

c. Emission Limitation:

Particulate matter (PM) emissions and particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.01 pound per hour and 0.01 ton per year (TPY).

Applicable Compliance Method:

The hourly and annual emission limitations are based upon the emissions unit's potential to emit. Potential PM-PM10 emissions were determined based on the following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

PM-PM10 = (300 pounds of ink produced per hour maximum production) x (20% by weight of ink is pigment) x (2 pounds of particulate per ton of pigment in ink produced emissions factor) x (1 - 98% control efficiency of scrubber) / (2000 pounds per ton).

PM-PM10 = (100,000 pounds of ink produced per year maximum production) x (20% by weight of ink is pigment) x (2 pounds of particulate per ton of pigment in ink produced emissions factor) x (1 - 98% control efficiency of scrubber) / (2000 pounds per ton) / (2000 pounds per ton).

- (3) Compliance with the visible emission limitation shall be based on visible particulate emissions testing per OAC rule 3745-17-03(B)(1), (USEPA Method 9, 40 CFR 60, Appendix A).
- (4) Compliance with the percent by weight OC content limit in b)(2)b. shall be determined by the record keeping requirements as specified in d)(1).
- (5) Compliance with the ink production limitation in c)(1) shall be determined by the record keeping requirements as specified in d)(1).



**Final Permit-to-Install and Operate**

American Inks and Coatings

**Permit Number:** P0118148

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g) Miscellaneous Requirements

(1) None.



**18. P033, Roto Mixer M-113**

**Operations, Property and/or Equipment Description:**

Roto Mixer M-113

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. d)(2).
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. b)(1)b., b)(2)b., c)(1), d)(1), e)(1), f)(1)b., f)(3), and f)(4).
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 0.90 pound per hour and 12.96 pounds per day. Particulate matter (PM) emissions and particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.01 pound per hour and 0.01 ton per year (TPY).  The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-17-07(A)(1).
b.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V	Organic compound (OC) emissions shall not exceed 1.20 tons per year (TPY), based on a rolling, 12-month summation.  See b)(2)b., c)(1), and Sections B.2., B.3., B.4., and B.5.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-17-07(A)(1)	See b)(2)a.

(2) Additional Terms and Conditions

- a. Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
- b. The maximum OC content for the inks produced in this emissions unit shall not exceed 20 percent by weight.
- c. The hourly and daily emission limitations for OC and the hourly and annual emission limitations for PM-PM10 outlined above are based on the emissions unit's potential to emit (PTE) taking into consideration the batch type nature of the operation. Therefore, no daily records are required to demonstrate compliance with these limits.
- d. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the production limitation, OC content limitation, the use of a scrubber for particulate control, and the HAP, OC and PM/PM10 emissions limitations.

c) Operational Restrictions

- (1) The maximum annual ink production rate for this emissions unit shall not exceed 800,000 pounds, based on a rolling, 12-month summation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for this emissions unit:
  - a. The name and identification of each batch of ink produced;
  - b. The OC content for each ink produced, in percent by weight;
  - c. The amount of each ink produced, in pounds;
  - d. The rolling, 12-month summation of the ink production figures, in pounds;
  - e. The OC emissions from each ink produced, in pounds or tons, calculated by multiplying the pounds of ink produced by an emission factor of 0.003 lb OC/pound of ink produced (AP-42 Table 6.4-1; 5/83);
  - f. The rolling, 12-month summation of the total combined OC emissions from all inks produced, in pounds or tons;





- iv. the rolling, 12-month emission limitation for HAP emissions specified in Section B.2.
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) **Testing Requirements**

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. **Emission Limitation:**

Organic compound (OC) emissions shall not exceed 0.90 pound per hour and 12.96 pounds per day.

**Applicable Compliance Method:**

The hourly and daily emission limitations are based upon the emissions unit's potential to emit. Potential OC emissions were determined based on the following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$OC = (300 \text{ pounds of ink produced per hour maximum production}) \times (0.003 \text{ pound of OC per pound of ink produced emissions factor}).$

$OC = (300 \text{ pounds of ink produced per hour maximum production}) \times (0.003 \text{ pound of OC per pound of ink produced emissions factor}) \times (14.4 \text{ hours per day maximum hours per day mixing}).$



b. Emission Limitation:

The annual organic compound (OC) emissions from this emissions unit shall not exceed 1.20 tons per year (TPY), based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month OC emission limitation identified in b)(1)b. shall be demonstrated by the record keeping requirement identified in d)(1).

Actual OC emissions for emissions unit P033 shall be determined based on the following equation from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

OC = Sum of [(pounds of ink produced x 0.003 pound of OC per pound of ink produced emissions factor / 2000 lbs per ton)] for each ink, and for each emissions unit.

c. Emission Limitation:

Particulate matter (PM) emissions and particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.01 pound per hour and 0.01 ton per year (TPY).

Applicable Compliance Method:

The hourly and annual emission limitations are based upon the emissions unit's potential to emit. Potential PM-PM10 emissions were determined based on the following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

PM-PM10 = (300 pounds of ink produced per hour maximum production) x (20% by weight of ink is pigment) x (2 pounds of particulate per ton of pigment in ink produced emissions factor) x (1 - 98% control efficiency of scrubber) / (2000 pounds per ton).

PM-PM10 = (800,000 pounds of ink produced per year maximum production) x (20% by weight of ink is pigment) x (2 pounds of particulate per ton of pigment in ink produced emissions factor) x (1 - 98% control efficiency of scrubber) / (2000 pounds per ton) / (2000 pounds per ton).

- (2) Compliance with the visible emission limitation shall be based on visible particulate emissions testing per OAC rule 3745-17-03(B)(1), (USEPA Method 9, 40 CFR 60, Appendix A).
- (3) Compliance with the percent by weight OC content limit in b)(2)b. shall be determined by the record keeping requirements as specified in d)(1).
- (4) Compliance with the ink production limitation in c)(1) shall be determined by the record keeping requirements as specified in d)(1).



**Final Permit-to-Install and Operate**  
American Inks and Coatings  
**Permit Number:** P0118148  
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g) Miscellaneous Requirements

(1) None.



**19. P037, 24 Pump Ink Dispensing System**

**Operations, Property and/or Equipment Description:**

24 Pump Ink Dispensing System

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. d)(2).
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. b)(1)b., b)(2)a., c)(1), d)(1), e)(1), f)(1)b., f)(2), and f)(3).
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 1.20 pounds per hour and 23.04 pounds per day.  The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V	OC emissions shall not exceed 2.43 tons per year (TPY), based on a rolling, 12-month summation.  See b)(2)a., c)(1), and Sections B.2., B.3., B.4., and B.5.

- (2) Additional Terms and Conditions
  - a. The maximum OC content for the inks produced in this emissions unit shall not exceed 20 percent by weight.



- b. The hourly and daily emission limitations for OC outlined above are based on the emissions unit's potential to emit (PTE) taking into consideration the batch type nature of the operation. Therefore, no daily records are required to demonstrate compliance with these limits.
  - c. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the production limitation, OC content limitation, and the HAP and OC emissions limitations.
- c) Operational Restrictions
- (1) The maximum annual ink production rate for this emissions unit shall not exceed 1,620,000 pounds, based on a rolling, 12-month summation.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall collect and record the following information each month for this emissions unit:
    - a. The name and identification of each batch of ink produced;
    - b. The OC content for each ink produced, in percent by weight;
    - c. The amount of each ink produced, in pounds;
    - d. The rolling, 12-month summation of the ink production figures, in pounds;
    - e. The OC emissions from each ink produced, in pounds or tons, calculated by multiplying the pounds of ink produced by an emission factor of 0.003 lb OC/pound of ink produced (AP-42 Table 6.4-1; 5/83); and
    - f. The rolling, 12-month summation of the total combined OC emissions from all inks produced, in pounds or tons.
  - (2) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified FEPTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new FEPTIO.
- e) Reporting Requirements
- (1) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard



copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
    - i. the rolling, 12-month emission limitation for OC emissions specified in b)(1)b.;
    - ii. the OC content limitation specified in b)(2)a.;
    - iii. the rolling, 12-month production limitation specified in c)(1); and
    - iv. the rolling, 12-month emission limitation for HAP emissions specified in Section B.2.
  - b. the probable cause of each deviation (excursion);
  - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
  - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.



f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Organic compound (OC) emissions shall not exceed 1.20 pounds per hour and 23.04 pounds per day.

Applicable Compliance Method:

The hourly and daily emission limitations are based upon the emissions unit's potential to emit. Potential OC emissions were determined based on the following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$OC = (400 \text{ pounds of ink produced per hour maximum production}) \times (0.003 \text{ pound of OC per pound of ink produced emissions factor})$ .

$OC = (400 \text{ pounds of ink produced per hour maximum production}) \times (0.003 \text{ pound of OC per pound of ink produced emissions factor}) \times (19.2 \text{ hours per day maximum hours per day mixing})$ .

b. Emission Limitation:

The annual organic compound (OC) emissions from this emissions unit shall not exceed 2.43 tons per year (TPY), based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month OC emission limitation identified in b)(1)b. shall be demonstrated by the record keeping requirement identified in d)(1).

Actual OC emissions for emissions unit P037 shall be determined based on the following equation from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$OC = \text{Sum of } [(pounds \text{ of ink produced} \times 0.003 \text{ pound of OC per pound of ink produced emissions factor} / 2000 \text{ lbs per ton})]$  for each ink, and for each emissions unit.

(2) Compliance with the percent by weight OC content limit in b)(2)a. shall be determined by the record keeping requirements as specified in d)(1).

(3) Compliance with the ink production limitation in c)(1) shall be determined by the record keeping requirements as specified in d)(1).



**Final Permit-to-Install and Operate**  
American Inks and Coatings  
**Permit Number:** P0118148  
**Facility ID:** 1409030956  
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g) Miscellaneous Requirements

(1) None.



**20. P040, T-145 Mixer**

**Operations, Property and/or Equipment Description:**

Poly Premix Tank

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. d)(2).
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. b)(1)b.
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<p>Organic compound (OC) emissions shall not exceed 0.9 pound per hour and 21.6 pounds per day.</p> <p>Particulate emissions (PE) shall not exceed 0.01 pound per hour and 0.01 ton per year.</p> <p>Particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.01 pound per hour and 0.01 ton per year.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-17-07(A)(1).</p> <p>See b)(2)b., b)(2)d., and c)(1).</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V	See Sections B.2., B.3., B.4., and B.5.
c.	OAC rule 3745-17-07(A)(1)	See b)(2)a.
d.	OAC rule 3745-17-11	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. Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
- b. The maximum OC content for the inks produced in this emissions unit shall not exceed 20 percent by weight.
- c. The hourly and daily emission limitations for OC and the hourly emission limitations for PM-PM10 outlined above are based on the emissions unit's potential to emit (PTE) taking into consideration the batch type nature of the operation. Therefore, no records are required to demonstrate compliance with these limits.
- d. The annual organic compounds (OC) emissions from emissions unit P040 shall not exceed 1.80 TPY.
- e. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the mass and visible emissions limitations, process throughput limitation and the use of a scrubber with an overall PE control efficiency of 98 percent.

c) Operational Restrictions

- (1) The maximum annual ink production rate for emissions unit P040 shall not exceed 1,200,000 pounds.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for emissions unit P040:
  - a. The name and identification of each batch of ink produced;
  - b. The OC content for each ink produced, in percent by weight;
  - c. The amount of each ink produced, in pounds; and
  - d. The OC emissions from each ink produced, in pounds or tons, calculated by multiplying the pounds of ink produced by an emission factor of 0.003 lb OC/pound of ink produced (AP-42 Table 6.4-1; 5/83).



- (2) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified FEPTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new FEPTIO.

e) Reporting Requirements

- (1) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:

- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
  - i. the rolling, 12-month emission limitation for HAP emissions specified in Section B.2.
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to



March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitation:

Visible particulate emissions from this emissions unit shall not exceed twenty percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method:

Compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 2002.

b. Emissions Limitations:

Particulate emissions (PE) shall not exceed 0.01 pound per hour; Particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.01 pound per hour.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the maximum hourly tons of pigments (non-volatiles/solids) employed by an emission factor of 2 pounds PM-PM10/ton pigment (AP-42 Table 6.7-1; 5/83) and by a scrubber control efficiency of (1 - 0.98), as provided in Permit to Install application 14-05687 as received on February 23, 2005. PM10 emissions are assumed to be equivalent to the PE rate.

c. Emissions Limitations:

Particulate emissions (PE) shall not exceed 0.01 TPY; Particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.01 TPY.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the limited maximum annual tons of pigments (non-volatiles/solids) employed by an emission factor of 2 pounds PM-PM10/ton pigment (AP-42 Table 6.7-1; 5/83) and by a scrubber



**Final Permit-to-Install and Operate**

American Inks and Coatings

**Permit Number:** P0118148

**Facility ID:** 1409030956

**Effective Date:** 1/26/2015

control efficiency of (1 - 0.98), as provided in Permit to Install application 14-05687 as received on February 23, 2005. PM10 emissions are assumed to be equivalent to the PE rate.

d. Emissions Limitations:

Organic compound (OC) emissions shall not exceed 0.9 pound per hour, 21.6 pounds per day, and 1.80 TPY.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying an emission factor of 0.3 pound OC/100 pounds of product (AP-42 Table 6.4-1; 5/83) and by the amount of ink produced, as provided in Permit to Install application 14-05687 as received on February 23, 2005.

- (2) Compliance with the percent by weight (OC content) limitation in b)(2)b. shall be demonstrated by the recordkeeping in d)(1).
- (3) Compliance with the production limitation in c)(1) shall be demonstrated by the recordkeeping in d)(1).

g) Miscellaneous Requirements

- (1) None.



**21. Emissions Unit Group -P003 and P005 Extender Tanks: T-156 and T-158**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
P003	Extender Tank T-156 with Mixer
P005	Extender Tank T-158 with Mixer

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. d)(2).

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(2)c., b)(2)d., c)(1), d)(1), e)(1), f)(1)b., f)(3), and f)(4).

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 2.44 pounds per hour and 50.27 pounds per day.  Particulate matter (PM) emissions and particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.02 pound per hour and 0.03 ton per year (TPY).  The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-17-07(A)(1).
b.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V	See b)(2)c., b)(2)d., c)(1), and Sections B.2., B.3., B.4., and B.5.
c.	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-17-07(A)(1)	See b)(2)b.

(2) Additional Terms and Conditions

- a. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of tight-fitting covers, production limitation, OC content limitation, the use of a scrubber for particulate control and compliance with the HAP, OC and PM/PM10 emissions limitations.
- b. Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
- c. The maximum OC content for the inks produced in this emissions unit shall not exceed 10 percent by weight.
- d. The combined annual organic compound (OC) emissions from emissions units P003, P004, and P005 shall not exceed 8.63 tons per year (TPY), based on a rolling, 12-month summation.
- e. The hourly and daily emission limitations for OC and the hourly and annual emission limitations for PM-PM10 outlined above are based on the emissions unit's potential to emit (PTE) taking into consideration the batch type nature of the operation. Therefore, no daily records are required to demonstrate compliance with these limits.

c) Operational Restrictions

- (1) The maximum annual ink production rate for emissions units P003, P004, and P005, combined, shall not exceed 15,000,000 pounds, based on a rolling, 12-month summation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for emissions units P003, P004, and P005, combined:
  - a. The name and identification of each batch of ink produced;
  - b. The OC content for each ink produced, in percent by weight;
  - c. The amount of each ink produced, in pounds;
  - d. The rolling, 12-month summation of the ink production figures, in pounds;



- e. The OC emissions from each ink produced, in pounds or tons, calculated by multiplying the pounds of ink produced by an emission factor of 0.00115 lb OC/pound of ink produced (NAPIM Table 3-3; 3/96);
  - f. The rolling, 12-month summation of the total combined OC emissions from all inks produced, in pounds or tons;
  - g. The amount of pigments (non-volatiles/solids) employed in tons; and
  - h. The PM-PM10 emissions, in pounds or tons, calculated by multiplying the tons of pigments (non-volatiles/solids) employed by an emission factor of 2 pounds PM-PM10/ton pigment (AP-42 Table 6.7-1; 5/83) and by a scrubber control efficiency of (1-.98).
- (2) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified FEPTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new FEPTIO.
- e) Reporting Requirements
- (1) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.
  - (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
    - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:



- i. the rolling, 12-month emission limitation for OC emissions specified in b)(2)d.;
  - ii. the OC content limitation specified in b)(2)c.;
  - iii. the rolling, 12-month production limitation specified in c)(1); and
  - iv. the rolling, 12-month emission limitation for HAP emissions specified in Section B.2.
- b. the probable cause of each deviation (excursion);
  - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
  - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

Organic compound (OC) emissions shall not exceed 2.44 pounds per hour and 50.27 pounds per day.

Applicable Compliance Method:

The hourly and daily emission limitations are based upon the emissions unit's potential to emit. Potential OC emissions were determined based on the following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$OC = (2125 \text{ pounds of ink produced per hour maximum production}) \times (0.00115 \text{ pound of OC per pound of ink produced emissions factor}).$



OC = (2125 pounds of ink produced per hour maximum production) x (0.00115 pound of OC per pound of ink produced emissions factor) x (20.6 hours per day maximum hours per day mixing).

b. Emission Limitation:

The combined annual organic compound (OC) emissions from emissions units P003, P004, and P005 shall not exceed 8.63 tons per year (TPY), based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month OC emission limitation identified in b)(2)d. shall be demonstrated by the record keeping requirement identified in d)(1).

Actual OC emissions for emissions units P003, P004, and P005 shall be determined based on the following equation from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

OC = Sum of [(pounds of ink produced x 0.00115 pound of OC per pound of ink produced emissions factor / 2000 lbs per ton)] for each ink, and for each emissions unit.

c. Emission Limitation:

Particulate matter (PM) emissions and particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.02 pound per hour and 0.03 ton per year (TPY).

Applicable Compliance Method:

The hourly and annual emission limitations are based upon the emissions unit's potential to emit. Potential PM-PM10 emissions were determined based on the following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

PM-PM10 = (2125 pounds of ink produced per hour maximum production) x (50% by weight of ink is pigment) x (2 pounds of particulate per ton of pigment in ink produced emissions factor) x (1 - 98% control efficiency of scrubber) / (2000 pounds per ton).

PM-PM10 = (6,450,000 pounds of ink produced per year maximum production) x (50% by weight of ink is pigment) x (2 pounds of particulate per ton of pigment in ink produced emissions factor) x (1 - 98% control efficiency of scrubber) / (2000 pounds per ton) / (2000 pounds per ton).

- (2) Compliance with the visible emission limitation shall be based on visible particulate emissions testing per OAC rule 3745-17-03(B)(1), (USEPA Method 9, 40 CFR 60, Appendix A).



**Final Permit-to-Install and Operate**

American Inks and Coatings

**Permit Number:** P0118148

**Facility ID:** 1409030956

**Effective Date:** 1/26/2015

- (3) Compliance with the percent by weight OC content limit in b)(2)c. shall be determined by the record keeping requirements as specified in d)(1).
  - (4) Compliance with the ink production limitation in c)(1) shall be determined by the record keeping requirements as specified in d)(1).
- g) Miscellaneous Requirements
- (1) None.



**22. Emissions Unit Group -P009 and P010 Color Tanks: P009,P010**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
P009	Color Tank T-125 with Mixer
P010	Color Tank T-126 with Mixer

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. d)(2).

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(2)b., b)(2)d., c)(1), d)(1), e)(1), f)(1)b., f)(2), and f)(3).

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 1.89 pounds per hour and 37.72 pounds per day.  The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V	See b)(2)b., b)(2)d., c)(1), and Sections B.2., B.3., B.4., and B.5.

(2) Additional Terms and Conditions

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



- b. The maximum OC content for the inks produced in this emissions unit shall not exceed 10 percent by weight.
  - c. The hourly and daily emission limitations for OC outlined above are based on the emissions unit's potential to emit (PTE) taking into consideration the batch type nature of the operation. Therefore, no daily records are required to demonstrate compliance with these limits.
  - d. The combined annual organic compound (OC) emissions from emissions units P009, P010, and P011 shall not exceed 8.05 tons per year (TPY), based on a rolling, 12-month summation.
- c) Operational Restrictions
- (1) The maximum annual ink production rate for emissions units P009, P010, and P011 shall not exceed 14,000,000 pounds, based on a rolling, 12-month summation.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall collect and record the following information each month for emissions units P009, P010, and P011, combined:
    - a. The name and identification of each batch of ink produced;
    - b. The OC content for each ink produced, in percent by weight;
    - c. The amount of each ink produced, in pounds;
    - d. The rolling, 12-month summation of the ink production figures, in pounds;
    - e. The OC emissions from each ink produced, in pounds or tons, calculated by multiplying the pounds of ink produced by an emission factor of 0.00115 lb OC/pound of ink produced (NAPIM Table 3-3; 3/96); and
    - f. The rolling, 12-month summation of the total combined OC emissions from all inks produced, in pounds or tons.
  - (2) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified FEPTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new FEPTIO.



e) Reporting Requirements

(1) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

(2) The permittee shall submit quarterly deviation (excursion) reports that identify:

- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
  - i. the rolling, 12-month emission limitation for OC emissions specified in b)(2)d.;
  - ii. the OC content limitation specified in b)(2)b.;
  - iii. the rolling, 12-month production limitation specified in c)(1); and
  - iv. the rolling, 12-month emission limitation for HAP emissions specified in Section B.2.
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).



- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Organic compound (OC) emissions shall not exceed 1.89 pounds per hour and 37.72 pounds per day.

Applicable Compliance Method:

The hourly and daily emission limitations are based upon the emissions unit's potential to emit. Potential OC emissions were determined based on the following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$OC = (1640 \text{ pounds of ink produced per hour maximum production}) \times (0.00115 \text{ pound of OC per pound of ink produced emissions factor}).$

$OC = (1640 \text{ pounds of ink produced per hour maximum production}) \times (0.00115 \text{ pound of OC per pound of ink produced emissions factor}) \times (20.0 \text{ hours per day maximum hours per day mixing}).$

b. Emission Limitation:

The combined annual organic compound (OC) emissions from emissions units P009, P010, and P011 shall not exceed 8.05 tons per year (TPY), based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month OC emission limitation identified in b)(2)d. shall be demonstrated by the record keeping requirement identified in d)(1).

Actual OC emissions for emissions units P009, P010, and P011 shall be determined based on the following equation from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$OC = \text{Sum of } [( \text{pounds of ink produced} \times 0.00115 \text{ pound of OC per pound of ink produced emissions factor} / 2000 \text{ lbs per ton} )]$  for each ink, and for each emissions unit.



**Final Permit-to-Install and Operate**

American Inks and Coatings

**Permit Number:** P0118148

**Facility ID:** 1409030956

**Effective Date:** 1/26/2015

- (2) Compliance with the percent by weight OC content limit in b)(2)b. shall be determined by the record keeping requirements as specified in d)(1).
  - (3) Compliance with the ink production limitation in c)(1) shall be determined by the record keeping requirements as specified in d)(1).
- g) Miscellaneous Requirements
- (1) None.



**23. Emissions Unit Group -P017 and P018 Poly Premix Tanks: P017,P018**

EU ID	Operations, Property and/or Equipment Description
P017	Poly Premix Tank MX-118 with Mixer
P018	Poly Premix Tank MX-146 with Mixer

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. d)(2).
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. b)(2)b., b)(2)d., c)(1), d)(1), e)(1), f)(1)b., f)(3), and f)(4).
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 0.69 pound per hour and 15.06 pounds per day.  Particulate matter (PM) emissions and particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.01 pound per hour and 0.01 ton per year (TPY).  The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-17-07(A)(1).
b.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V	See b)(2)b., b)(2)d., c)(1), and Sections B.2., B.3., B.4., and B.5.
c.	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-17-07(A)(1)	See b)(2)a.

(2) Additional Terms and Conditions

- a. Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
- b. The maximum OC content for the inks produced in this emissions unit shall not exceed 20 percent by weight.
- c. The hourly and daily emission limitations for OC and the hourly and annual emission limitations for PM-PM10 outlined above are based on the emissions unit's potential to emit (PTE) taking into consideration the batch type nature of the operation. Therefore, no daily records are required to demonstrate compliance with these limits.
- d. The combined annual organic compound (OC) emissions from emissions units P016, P017, and P018, combined, shall not exceed 7.50 tons per year (TPY), based on a rolling, 12-month summation.  
  
The permittee has existing records to demonstrate compliance with this emission limitation upon permit issuance.
- e. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the production limitation, OC content limitation, the use of a scrubber for particulate control, and the HAP, OC and PM/PM10 emissions limitations.

c) Operational Restrictions

- (1) The maximum annual ink production rate for emissions units P016, P017, and P018 shall not exceed 5,000,000 pounds, based on a rolling, 12-month summation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for emissions units P016, P017, and P018, combined:
  - a. The name and identification of each batch of ink produced;
  - b. The OC content for each ink produced, in percent by weight;
  - c. The amount of each ink produced, in pounds;
  - d. The rolling, 12-month summation of the ink production figures, in pounds;



- e. The OC emissions from each ink produced, in pounds or tons, calculated by multiplying the pounds of ink produced by an emission factor of 0.003 lb OC/pound of ink produced (AP-42 Table 6.4-1; 5/83);
  - f. The rolling, 12-month summation of the total combined OC emissions from all inks produced, in pounds or tons;
  - g. The amount of pigments (non-volatiles/solids) employed in tons; and
  - h. The PM-PM10 emissions, in pounds or tons, calculated by multiplying the tons of pigments (non-volatiles/solids) employed by an emission factor of 2 pounds PM-PM10/ton pigment (AP-42 Table 6.7-1; 5/83) and by a scrubber control efficiency of (1-.98).
- (2) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified FEPTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new FEPTIO.
- e) Reporting Requirements
- (1) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.
  - (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
    - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:



- i. the rolling, 12-month emission limitation for OC emissions specified in b)(2)d.;
  - ii. the OC content limitation specified in b)(2)b.;
  - iii. the rolling, 12-month production limitation specified in c)(1); and
  - iv. the rolling, 12-month emission limitation for HAP emissions specified in Section B.2.
- b. the probable cause of each deviation (excursion);
  - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
  - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) **Testing Requirements**

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. **Emission Limitation:**

Organic compound (OC) emissions shall not exceed 0.69 pound per hour and 15.06 pounds per day.

**Applicable Compliance Method:**

The hourly and daily emission limitations are based upon the emissions unit's potential to emit. Potential OC emissions were determined based on the following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

OC = (230 pounds of ink produced per hour maximum production) x (0.003 pound of OC per pound of ink produced emissions factor).



OC = (230 pounds of ink produced per hour maximum production) x (0.003 pound of OC per pound of ink produced emissions factor) x (21.8 hours per day maximum hours per day mixing).

b. Emission Limitation:

The combined annual organic compound (OC) emissions from emissions units P016, P017, and P018, combined, shall not exceed 7.50 tons per year (TPY), based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month OC emission limitation identified in b)(2)d. shall be demonstrated by the record keeping requirement identified in d)(1).

Actual OC emissions for emissions units P016, P017, and P018 shall be determined based on the following equation from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

OC = Sum of [(pounds of ink produced x 0.003 pound of OC per pound of ink produced emissions factor / 2000 lbs per ton)] for each ink, and for each emissions unit.

c. Emission Limitation:

Particulate matter (PM) emissions and particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.01 pound per hour and 0.01 ton per year (TPY).

Applicable Compliance Method:

The hourly and annual emission limitations are based upon the emissions unit's potential to emit. Potential PM-PM10 emissions were determined based on the following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

PM-PM10 = (230 pounds of ink produced per hour maximum production) x (25% by weight of ink is pigment) x (2 pounds of particulate per ton of pigment in ink produced emissions factor) x (1 - 98% control efficiency of scrubber) / (2000 pounds per ton).

PM-PM10 = (700,000 pounds of ink produced per year maximum production) x (25% by weight of ink is pigment) x (2 pounds of particulate per ton of pigment in ink produced emissions factor) x (1 - 98% control efficiency of scrubber) / (2000 pounds per ton) / (2000 pounds per ton).

- (2) Compliance with the visible emission limitation shall be based on visible particulate emissions testing per OAC rule 3745-17-03(B)(1), (USEPA Method 9, 40 CFR 60, Appendix A).



**Final Permit-to-Install and Operate**

American Inks and Coatings

**Permit Number:** P0118148

**Facility ID:** 1409030956

**Effective Date:** 1/26/2015

- (3) Compliance with the percent by weight OC content limit in b)(2)b. shall be determined by the record keeping requirements as specified in d)(1).
- (4) Compliance with the ink production limitation in c)(1) shall be determined by the record keeping requirements as specified in d)(1).
- g) Miscellaneous Requirements
  - (1) None.



**24. Emissions Unit Group -P030 and P031 Bench Mixers: P030,P031,**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
P030	Bench Mixer No. 1
P031	Bench Mixer No. 2

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
- (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
- a. d)(2).
- (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
- a. b)(2)b., b)(2)d., c)(1), d)(1), e)(1), f)(1)b., f)(3), and f)(4).
- b) **Applicable Emissions Limitations and/or Control Requirements**
- (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	<b>Applicable Rules/Requirements</b>	<b>Applicable Emissions Limitations/Control Measures</b>
a.	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 0.30 pound per hour and 4.80 pounds per day.  Particulate matter (PM) emissions and particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.01 pound per hour and 0.01 ton per year (TPY).  The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-17-07(A)(1).
b.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V	See b)(2)b., b)(2)d., c)(1), and Sections B.2., B.3., B.4., and B.5.
c.	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-17-07(A)(1)	See b)(2)a.

(2) Additional Terms and Conditions

- a. Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
- b. The maximum OC content for the inks produced in this emissions unit shall not exceed 50 percent by weight.
- c. The hourly and daily emission limitations for OC and the hourly and annual emission limitations for PM-PM10 outlined above are based on the emissions unit's potential to emit (PTE) taking into consideration the batch type nature of the operation. Therefore, no daily records are required to demonstrate compliance with these limits.
- d. The combined annual organic compound (OC) emissions from emissions units P028, P029, P030, and P031, combined, shall not exceed 2.25 tons per year (TPY), based on a rolling, 12-month summation.
- e. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the production limitation, OC content limitation, the use of a scrubber for particulate control, and the HAP, OC and PM/PM10 emissions limitations.

c) Operational Restrictions

- (1) The maximum annual ink production rate for emissions units P028, P029, P030, and P031 shall not exceed 600,000 pounds, based on a rolling, 12-month summation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for emissions units P028, P029, P030, and P031, combined:
  - a. The name and identification of each batch of ink produced;
  - b. The OC content for each ink produced, in percent by weight;
  - c. The amount of each ink produced, in pounds;
  - d. The rolling, 12-month summation of the ink production figures, in pounds;
  - e. The OC emissions from each ink produced, in pounds or tons, calculated by multiplying the pounds of ink produced by an emission factor of 0.0075 lb OC/pound of ink produced (AP-42 Table 6.4-1; 5/83);



- f. The rolling, 12-month summation of the total combined OC emissions from all inks produced, in pounds or tons;
  - g. The amount of pigments (non-volatiles/solids) employed in tons; and
  - h. The PM-PM10 emissions, in pounds or tons, calculated by multiplying the tons of pigments (non-volatiles/solids) employed by an emission factor of 2 pounds PM-PM10/ton pigment (AP-42 Table 6.7-1; 5/83) and by a scrubber control efficiency of (1-.98).
- (2) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified FEPTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new FEPTIO.
- e) Reporting Requirements
- (1) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
    - i. the rolling, 12-month emission limitation for OC emissions specified in b)(2)d.;
    - ii. the OC content limitation specified in b)(2)b.;



- iii. the rolling, 12-month production limitation specified in c)(1); and
  - iv. the rolling, 12-month emission limitation for HAP emissions specified in Section B.2.
- b. the probable cause of each deviation (excursion);
  - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
  - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

Organic compound (OC) emissions shall not exceed 0.30 pound per hour and 4.80 pounds per day.

Applicable Compliance Method:

The hourly and daily emission limitations are based upon the emissions unit's potential to emit. Potential OC emissions were determined based on the following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$OC = (40 \text{ pounds of ink produced per hour maximum production}) \times (0.0075 \text{ pound of OC per pound of ink produced emissions factor}).$

$OC = (40 \text{ pounds of ink produced per hour maximum production}) \times (0.0075 \text{ pound of OC per pound of ink produced emissions factor}) \times (16 \text{ hours per day maximum hours per day mixing}).$



b. Emission Limitation:

The combined annual organic compound (OC) emissions from emissions units P028, P029, P030, and P031, combined, shall not exceed 2.25 tons per year (TPY), based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month OC emission limitation identified in b)(2)d. shall be demonstrated by the record keeping requirement identified in d)(1).

Actual OC emissions for emissions units P028, P029, P030, and P031 shall be determined based on the following equation from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

OC = Sum of [(pounds of ink produced x 0.0075 pound of OC per pound of ink produced emissions factor / 2000 lbs per ton)] for each ink, and for each emissions unit.

c. Emission Limitation:

Particulate matter (PM) emissions and particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.01 pound per hour and 0.01 ton per year (TPY).

Applicable Compliance Method:

The hourly and annual emission limitations are based upon the emissions unit's potential to emit. Potential PM-PM10 emissions were determined based on the following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

PM-PM10 = (40 pounds of ink produced per hour maximum production) x (30% by weight of ink is pigment) x (2 pounds of particulate per ton of pigment in ink produced emissions factor) x (1 - 98% control efficiency of scrubber) / (2000 pounds per ton).

PM-PM10 = (100,000 pounds of ink produced per year maximum production) x (30% by weight of ink is pigment) x (2 pounds of particulate per ton of pigment in ink produced emissions factor) x (1 - 98% control efficiency of scrubber) / (2000 pounds per ton) / (2000 pounds per ton).

- (2) Compliance with the visible emission limitation shall be based on visible particulate emissions testing per OAC rule 3745-17-03(B)(1), (USEPA Method 9, 40 CFR 60, Appendix A).
- (3) Compliance with the percent by weight OC content limit in b)(2)b. shall be determined by the record keeping requirements as specified in d)(1).
- (4) Compliance with the ink production limitation in c)(1) shall be determined by the record keeping requirements as specified in d)(1).



**Final Permit-to-Install and Operate**  
American Inks and Coatings  
**Permit Number:** P0118148  
**Facility ID:** 1409030956  
**Effective Date:** 1/26/2015

g) Miscellaneous Requirements

(1) None.



**25. Emissions Unit Group -P034 - P036 Roto Mixers: P034,P035,P036**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
P034	Roto Mixer M-114
P035	Roto Mixer M-115
P036	Roto Mixer M-116

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. d)(2).

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(2)b., b)(2)d., c)(1), d)(1), e)(1), f)(1)b., f)(3), and f)(4).

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	<b>Applicable Rules/Requirements</b>	<b>Applicable Emissions Limitations/Control Measures</b>
a.	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 0.35 pound per hour and 4.97 pounds per day.  Particulate matter (PM) emissions and particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.01 pound per hour and 0.01 ton per year (TPY).  The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-17-07(A)(1).
b.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V	See b)(2)b., b)(2)d., c)(1), and Sections B.2., B.3., B.4., and B.5.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-17-07(A)(1)	See b)(2)a.

(2) Additional Terms and Conditions

- a. Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
- b. The maximum OC content for the inks produced in this emissions unit shall not exceed 10 percent by weight.
- c. The hourly and daily emission limitations for OC and the hourly and annual emission limitations for PM-PM10 outlined above are based on the emissions unit's potential to emit (PTE) taking into consideration the batch type nature of the operation. Therefore, no daily records are required to demonstrate compliance with these limits.
- d. The combined annual organic compound (OC) emissions from emissions units P034, P035, and P036, combined, shall not exceed 1.38 tons per year (TPY), based on a rolling, 12-month summation.
- e. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the production limitation, OC content limitation, the use of a scrubber for particulate control, and the HAP, OC and PM/PM10 emissions limitations.

c) Operational Restrictions

- (1) The maximum annual ink production rate for emissions units P034, P035, and P036 shall not exceed 2,400,000 pounds, based on a rolling, 12-month summation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for emissions units P034, P035, and P036, combined:
  - a. The name and identification of each batch of ink produced;
  - b. The OC content for each ink produced, in percent by weight;
  - c. The amount of each ink produced, in pounds;
  - d. The rolling, 12-month summation of the ink production figures, in pounds;



- e. The OC emissions from each ink produced, in pounds or tons, calculated by multiplying the pounds of ink produced by an emission factor of 0.00115 lb OC/pound of ink produced (NAPIM Table 3-3; 3/96);
  - f. The rolling, 12-month summation of the total combined OC emissions from all inks produced, in pounds or tons;
  - g. The amount of pigments (non-volatiles/solids) employed in tons; and
  - h. The PM-PM10 emissions, in pounds or tons, calculated by multiplying the tons of pigments (non-volatiles/solids) employed by an emission factor of 2 pounds PM-PM10/ton pigment (AP-42 Table 6.7-1; 5/83) and by a scrubber control efficiency of (1-.98).
- (2) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified FEPTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new FEPTIO.
- e) Reporting Requirements
- (1) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.
  - (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
    - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:



- i. the rolling, 12-month emission limitation for OC emissions specified in b)(2)d.;
  - ii. the OC content limitation specified in b)(2)b.;
  - iii. the rolling, 12-month production limitation specified in c)(1); and
  - iv. the rolling, 12-month emission limitation for HAP emissions specified in Section B.2.
- b. the probable cause of each deviation (excursion);
  - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
  - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) **Testing Requirements**

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. **Emission Limitation:**

Organic compound (OC) emissions shall not exceed 0.35 pound per hour and 4.97 pounds per day.

**Applicable Compliance Method:**

The hourly and daily emission limitations are based upon the emissions unit's potential to emit. Potential OC emissions were determined based on the following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

OC = (300 pounds of ink produced per hour maximum production) x (0.00115 pound of OC per pound of ink produced emissions factor).



OC = (300 pounds of ink produced per hour maximum production) x (0.00115 pound of OC per pound of ink produced emissions factor) x (14.4 hours per day maximum hours per day mixing).

b. Emission Limitation:

The combined annual organic compound (OC) emissions from emissions units P034, P035, and P036, combined, shall not exceed 1.38 tons per year (TPY), based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month OC emission limitation identified in b)(2)d. shall be demonstrated by the record keeping requirement identified in d)(1).

Actual OC emissions for emissions units P034, P035, and P036 shall be determined based on the following equation from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

OC = Sum of [(pounds of ink produced x 0.00115 pound of OC per pound of ink produced emissions factor / 2000 lbs per ton)] for each ink, and for each emissions unit.

c. Emission Limitation:

Particulate matter (PM) emissions and particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.01 pound per hour and 0.01 ton per year (TPY).

Applicable Compliance Method:

The hourly and annual emission limitations are based upon the emissions unit's potential to emit. Potential PM-PM10 emissions were determined based on the following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

PM-PM10 = (300 pounds of ink produced per hour maximum production) x (20% by weight of ink is pigment) x (2 pounds of particulate per ton of pigment in ink produced emissions factor) x (1 - 98% control efficiency of scrubber) / (2000 pounds per ton).

PM-PM10 = (800,000 pounds of ink produced per year maximum production) x (20% by weight of ink is pigment) x (2 pounds of particulate per ton of pigment in ink produced emissions factor) x (1 - 98% control efficiency of scrubber) / (2000 pounds per ton) / (2000 pounds per ton).

- (2) Compliance with the visible emission limitation shall be based on visible particulate emissions testing per OAC rule 3745-17-03(B)(1), (USEPA Method 9, 40 CFR 60, Appendix A).



**Final Permit-to-Install and Operate**

American Inks and Coatings

**Permit Number:** P0118148

**Facility ID:** 1409030956

**Effective Date:** 1/26/2015

- (3) Compliance with the percent by weight OC content limit in b)(2)b. shall be determined by the record keeping requirements as specified in d)(1).
- (4) Compliance with the ink production limitation in c)(1) shall be determined by the record keeping requirements as specified in d)(1).
- g) Miscellaneous Requirements
  - (1) None.



**26. Emissions Unit Group -Shot Mill Systems 4 & 5: P038, P039**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
P038	Shot Mill System Number 4
P039	Shot Mill System Number 5

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. d)(2).
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. b)(1)b.
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 1.23 pounds per hour and 26.1 pounds per day, excluding cleanup.  OC emissions shall not exceed 3.4 tons per year (TPY) for emissions units P038 and P039, combined, for ink production and cleanup.  See b)(2)a. and c)(1).  The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V	See Sections B.2., B.3., B.4., and B.5.



- (2) Additional Terms and Conditions
  - a. The maximum OC content for the inks produced in this emissions unit shall not exceed 80 percent by weight.
  - b. The hourly and daily emission limitations for OC outlined above are based on the emissions unit's potential to emit (PTE) taking into consideration the batch type nature of the operation. Therefore, no hourly and/or daily records are required to demonstrate compliance with these limits.
  - c. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the production limitation, OC content limitation and OC emissions limitations.
- c) Operational Restrictions
  - (1) The maximum annual ink production rate for emissions units P038 and P039, combined, shall not exceed 600,000 pounds.
- d) Monitoring and/or Recordkeeping Requirements
  - (1) The permittee shall collect and record the following information each month for emissions units P038 and P039 combined:
    - a. The name and identification of each batch of ink produced;
    - b. The OC content for each ink produced, in percent by weight;
    - c. The amount of each ink produced, in pounds;
    - d. The OC emissions from each ink produced, in pounds or tons, calculated by multiplying the pounds of ink produced by an emission factor of 0.0074 lb OC/pound of ink produced (NAPIM table 3-3; 3/96);
    - e. The name and identification of each cleanup material employed;
    - f. The number of pounds of each cleanup material employed;
    - g. The OC emissions from all cleanup materials, in pounds or tons; and
    - h. The total OC emissions from all inks produced and cleanup materials employed, in pounds or tons (d + g).
  - (2) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified FEPTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new FEPTIO.



e) Reporting Requirements

(1) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

(2) The permittee shall submit quarterly deviation (excursion) reports that identify:

- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
  - i. the rolling, 12-month emission limitation for HAP emissions specified in Section B.2.
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

(3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.



f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Organic compound (OC) emissions shall not exceed 1.23 pounds per hour and 26.1 pounds per day, excluding cleanup.

Applicable Compliance Method:

The hourly and daily emission limitations are based upon the emissions unit's potential to emit. Potential OC emissions were determined based on the following equations from the permittee-supplied information in PTI application 14-05498 as submitted on October 24, 2003:

$$OC = (175 \text{ pounds of ink produced per hour maximum production}) \times (0.7 \text{ pounds of OC per 100 pounds of ink produced emissions factor})$$

$$OC = (175 \text{ pounds of ink produced per hour maximum production}) \times (0.7 \text{ pounds of OC per 100 pounds of ink produced emissions factor}) \times (21.3 \text{ hours per day maximum hours per day mixing})$$

b. Emission Limitation:

OC emissions shall not exceed 3.4 tons per year (TPY) for emissions units P038 and P039, combined, for ink production and cleanup.

Applicable Compliance Method:

Compliance with the annual OC emission limitation identified in b)(1)a. shall be demonstrated by the record keeping requirement identified in d)(1).

Actual OC emissions for emissions units P038 and P039 shall be determined based on the following equation from the permittee-supplied information in PTI application 14-05498 as submitted on October 24, 2003:

$$OC = \text{Sum of } [( \text{pounds of ink produced} \times 0.7 \text{ pounds of OC per 100 pounds of ink produced emissions factor} / 2000 \text{ lbs per ton}) + ( \text{pounds of cleanup material employed} - \text{pounds of cleanup material recovered} / 2000 \text{ lbs per ton})]$$
 for each ink and cleanup material, and for each emissions unit.

(2) Compliance with the percent by weight OC content limit in b)(2)a. shall be determined by the record keeping requirements as specified in d)(1).

(3) Compliance with the ink production limitation in c)(1) shall be determined by the record keeping requirements as specified in d)(1).



**Final Permit-to-Install and Operate**  
American Inks and Coatings  
**Permit Number:** P0118148  
**Facility ID:** 1409030956  
**Effective Date:** 1/26/2015

g) Miscellaneous Requirements

- (1) None.