



5/14/2015

Kenneth Turner  
AMPAC Packaging LLC  
12025 TRICON RD  
Cincinnati, OH 45246

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1431420497  
Permit Number: P0118699  
Permit Type: Initial Installation  
County: Hamilton

Certified Mail

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

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, The Cincinnati Enquirer. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically 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. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall  
Permit Review/Development Section  
Ohio EPA, DAPC  
50 West Town Street Suite 700  
PO Box 1049  
Columbus, Ohio 43216-1049

and Southwest Ohio Air Quality Agency  
250 William Howard Taft Rd.  
Cincinnati, OH 45219

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Southwest Ohio Air Quality Agency at (513)946-7777.

Sincerely,

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

Cc: U.S. EPA Region 5 Via E-Mail Notification  
SWOQA; Indiana; Kentucky





## Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

FEPTIO application for initial installation of a 51 inch 2 color Flexographic printing press #17. The inks used will comply with OAC 3745-21-09(Y)(1)(a), which will also satisfy BAT. A facility wide VOC and HAP limitation is already in existence for all emissions units at the facility; the proposed permit will also be issued in draft form to ensure Federal enforceability.

3. Facility Emissions and Attainment Status:

AMPAC Packaging LLC is a synthetic minor facility for VOCs and HAPs. The facility has taken a combined limitation in the past to ease recordkeeping. Without the synthetic minor limit in place, VOC emissions would be 138 TPY and HAP emissions could potentially be above the 10/25 TPY threshold.

4. Source Emissions:

To remain a synthetic minor facility, AMPAC Packaging LLC will keep the combined VOC limitation of 8 tons per month and 96 TPY and a combined usage limitation of 250,000 gallons per year. The facility will also keep the HAP limitation of less than 10 TPY of any single HAP emissions and less than 25 TPY of any combined HAP emission.

5. Conclusion:

The usage and emissions limitations prevent this facility from becoming a major facility triggering Title V regulations and MACT Subpart KK regulations. The facility is an area source for Subpart KK. The facility will keep monthly usage and emissions records to demonstrate compliance.

6. Please provide additional notes or comments as necessary:

None

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	2.4



## PUBLIC NOTICE

The following matters are the subject of this public notice by the Ohio Environmental Protection Agency. The complete public notice, including any additional instructions for submitting comments, requesting information, a public hearing, or filing an appeal may be obtained at: <http://epa.ohio.gov/actions.aspx> or Hearing Clerk, Ohio EPA, 50 W. Town St., Columbus, Ohio 43215. Ph: 614-644-2129 email: [HClerk@epa.ohio.gov](mailto:HClerk@epa.ohio.gov)

Draft Air Pollution Permit-to-Install and Operate Initial Installation

AMPAC Packaging LLC

12025 TRICON RD,, Cincinnati, OH 45246

ID#:P0118699

Date of Action: 5/14/2015

Permit Desc:Initial installation permit for a 51-inch, 2-color Flexographic printing press #17.

The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the ID # or: Bonnie Pray, Southwest Ohio Air Quality Agency, 250 William Howard Taft Rd., Cincinnati, OH 45219. Ph: (513)946-7777





**DRAFT**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
AMPAC Packaging LLC**

Facility ID:	1431420497
Permit Number:	P0118699
Permit Type:	Initial Installation
Issued:	5/14/2015
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance





**Division of Air Pollution Control**  
**Permit-to-Install and Operate**  
for  
AMPAC Packaging LLC

**Table of Contents**

Authorization .....	1
A. Standard Terms and Conditions .....	3
1. What does this permit-to-install and operate ("PTIO") allow me to do?.....	4
2. Who is responsible for complying with this permit? .....	4
3. What records must I keep under this permit? .....	4
4. What are my permit fees and when do I pay them?.....	4
5. When does my PTIO expire, and when do I need to submit my renewal application? .....	4
6. What happens to this permit if my project is delayed or I do not install or modify my source? .....	5
7. What reports must I submit under this permit? .....	5
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? .....	5
9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? ...	5
10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report? .....	6
11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located? .....	6
12. What happens if one or more emissions units operated under this permit is/are shut down permanently? .....	6
13. Can I transfer this permit to a new owner or operator?.....	7
14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"? .....	7
15. What happens if a portion of this permit is determined to be invalid? .....	7
B. Facility-Wide Terms and Conditions.....	8
C. Emissions Unit Terms and Conditions .....	11
1. K023, Flexographic Press #17 .....	12





**Draft Permit-to-Install and Operate**

AMPAC Packaging LLC

**Permit Number:** P0118699

**Facility ID:** 1431420497

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

## Authorization

Facility ID: 1431420497  
Application Number(s): A0053127  
Permit Number: P0118699  
Permit Description: Initial installation permit for a 51-inch, 2-color Flexographic printing press #17  
Permit Type: Initial Installation  
Permit Fee: \$200.00 *DO NOT send payment at this time, subject to change before final issuance*  
Issue Date: 5/14/2015  
Effective Date: To be entered upon final issuance  
Expiration Date: To be entered upon final issuance  
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

AMPAC Packaging LLC  
12025 TRICON RD  
Cincinnati, OH 45246

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



**Draft Permit-to-Install and Operate**

AMPAC Packaging LLC

**Permit Number:** P0118699

**Facility ID:** 1431420497

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

## Authorization (continued)

Permit Number: P0118699

Permit Description: Initial installation permit for a 51-inch, 2-color Flexographic printing press #17

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>K023</b>
Company Equipment ID:	Flexographic Press #17
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



**Draft Permit-to-Install and Operate**  
AMPAC Packaging LLC  
**Permit Number:** P0118699  
**Facility ID:** 1431420497  
**Effective Date:** To be entered upon final issuance

## **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 Southwest Ohio Air Quality Agency 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.



**Draft Permit-to-Install and Operate**

AMPAC Packaging LLC

**Permit Number:** P0118699

**Facility ID:** 1431420497

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

## **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 allowable emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from emissions units K006, K013, K014, K019, K020, K022, and K023, and all de minimis emissions units (as defined in OAC rule 3745-15-05), all emissions units exempt from the requirement to obtain a permit-to-install pursuant to OAC rule 3745-31-03 currently, and future to-be-installed air contaminant sources, combined, shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.
3. The permittee shall collect and record the following information each month for the emissions units identified in 2:
  - a) The name and identification number of each coating employed.
  - b) The individual Hazardous Air Pollutant (HAP)\* content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied.
  - c) The total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied [sum of all individual HAP contents from (b)].
  - d) The number of gallons of each coating employed.
  - e) The name and identification of each cleanup material employed.
  - f) The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied.
  - g) The total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied [sum all the individual HAP contents from (f)].
  - h) The number of gallons of each cleanup material employed [the total number of gallons of each cleanup material employed less the number of gallons of each cleanup material collected for reuse and disposal].
  - i) The total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) times the



emission factor or overall control efficiency\*\* (if applicable) for each coating plus the sum of (f) times (h) for each cleanup material plus individual HAP emissions from any de minimis, registration status and/or permit exempt emissions unit at the facility].

- j) The total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per month [the sum of (c) times (d) times the emission factor or overall control efficiency\*\* (if applicable) for each coating plus the sum of (g) times (h) for each cleanup material plus combined HAP emissions from any de minimis, registration status and/or permit exempt emissions unit at the facility].
- k) The updated rolling, 12-month summation of the individual HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
- l) The updated rolling, 12-month summation of the combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

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

\*\* Overall control efficiency shall be from the most recent performance test that demonstrated that the emissions unit was in compliance.

- 4. The permittee shall submit deviation (excursion) reports which identify any exceedance of the rolling, 12-month HAP emission limitations outlined in 2.

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).

- 5. Compliance with the emission limitations specified in 2. shall be determined in accordance with the following methods:

- a) Emission Limitation:

9.9 TPY for any individual HAP and 24.9 TPY for any combination of HAPs.

Applicable Compliance Method:

Compliance with the HAP emission limitations in 2. shall be demonstrated by the record keeping in 3.



**Draft Permit-to-Install and Operate**

AMPAC Packaging LLC

**Permit Number:** P0118699

**Facility ID:** 1431420497

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

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



**1. K023, Flexographic Press #17**

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

Two Color Flexographic Printing Press

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. b)(1)b. and e)(5).

(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), d)(2), e)(2), and f)(1)a.

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) June 30, 2008	The Best Available Technology (BAT) requirements for this air contaminant source are satisfied by compliance with the requirements of OAC rule 3745-21-09(Y)(1)(a).  See b)(2)a. and b)(2)d.
b.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the potential to emit is less than 10 tons per year. See b)(2)e. below.
c.	OAC rule 3745-31-05(D) Synthetic Minor to avoid 40 CFR Part 63, Subpart KK and Title V.	See Section B.2., b)(2)b. and c)(1).
d.	OAC rule 3745-21-09(Y)(1)(a)	See b)(2)a.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	40 CFR Part 63 Subpart KK	See b)(2)d.

(2) Additional Terms and Conditions

a. The VOC content of any ink or coating employed in the printing line(s) shall not exceed the following limitations:

i. 40% VOC by volume of the coatings and inks, excluding water and exempt solvents, as determined under paragraph (B) of OAC rule 3745-21-10 of the Administrative Code for  $C_{VOC,5}$ ; or

$$C_{VOC,5} = (100)(V_{VOC}) / (V_s + V_{VOC})$$

ii. 25% VOC by volume of the volatile matter in the coatings and inks, as determined under paragraph (B) of OAC rule 3745-21-10 of the Administrative Code for  $C_{VOC,6}$ .

$$C_{VOC,6} = (100)(V_{VOC}) / V_{VM}$$

b. The combined annual VOC emissions from flexographic printing presses K006, K013, K014, K019, K020, K022, and K023 shall not exceed 8 tons per month and 96 tons per year.

c. The permittee commits to and meets the criteria to be considered an area source for Hazardous Air Pollutants, and is subject only to the record keeping and reporting provisions in 40 CFR 63.829(d) and 40 CFR 63.830(b)(1).

d. This Best Available Technology (BAT) emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).

e. These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.

c) Operational Restrictions

(1) The maximum combined annual coating usage from flexographic printing presses emissions units K006, K013, K014, K019, K020, K022, and K023 shall not exceed 250,000 gallons per year, based upon a rolling, 12-month summation of the coating usage figures.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of the following information for the emissions units listed in c)(1):



- a. the coating usage for each month; and
  - b. the rolling, 12-month summation of the coating usage.
- (2) The permittee shall collect and record the following information each month for the identified emissions units in b)(2)b.:
- a. The name and identification number for each coating and cleanup material employed.
  - b. The VOC content of the coatings and cleanup materials used in pounds per gallon, as applied.
  - c. The percent VOC by volume of each coating and cleanup material (excluding water and exempt solvents), as applied or the percent VOC by volume of the volatile matter in the coating.
  - d. The number of gallons of each coating and cleanup material employed.
  - e. The total combined VOC emissions, in pounds or tons per month [the sum of (b) times (d) for each coating and cleanup material].
- (3) The record of the calculation from paragraph (B) of OAC rule 3745-21-10, for the VOC content of each coating and ink applied, by volume of coating and ink (excluding water and exempt solvents),  $C_{VOC,5}$ , or by volume of the volatile matter of in the coatings/inks,  $C_{VOC,6}$ , shall be maintained on file and shall be made available upon request. The VOC content shall be determined by using U.S. EPA Method 24A for the flexographic and rotogravure printing inks and coatings; or the ink/coating formulation data from the manufacturer may be used if based on the same method.
- 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. HAP emission limitation outlined in Section B.2.;
    - ii. VOC emission limitation outlined in b)(2)b.; and
    - iii. The maximum combined annual coating usage of 250,000 gallons coating outlined in c)(1).
  - 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.
- (4) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
- (5) 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 PTIO 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 PTIO.



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:

The combined annual VOC emissions from flexographic printing presses K006, K013, K014, K019, K020, K022, and K023 shall not exceed 8 tons per month and 96 tons per year.

Applicable Compliance Method:

Compliance with the monthly and annual emission limitations shall be demonstrated by the recordkeeping requirements specified in d)(1) and d)(2). Compliance with the monthly limitation ensures compliance with the annual limitation.

b. Emission Limitation:

The VOC content of the inks employed in the printing line(s) shall not exceed 40% VOC by volume of the ink, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance with the VOC content limitation shall be demonstrated by the record keeping requirements established in d)(2). If required, compliance with the VOC content limitation shall be determined using U.S. EPA Method 24A for flexographic and rotogravure printing inks and coatings or the formulation data from the manufacturer, the VOC content shall be calculated as follows:

$$C_{VOC,5} = (100)(V_{VOC}) / (V_S + V_{VOC})$$

Where:

$C_{VOC,5}$  is the VOC content in percentage VOC by volume of the coating, excluding water and exempt solvents

$V_{VOC}$  is the volume fraction of VOC in the ink, calculated as:

$$V_{VOC} = V_{VM} - V_W - V_{ES}$$

$V_S$  is the volume fraction of solids (nonvolatile matter) in ink, in gallon of solids per gallon of ink

$V_{VM}$  is the volume fraction of volatile matter in ink, in gallon of volatile matter per gallon of ink

$V_W$  is the volume fraction of water in ink, in gallon of water per gallon of ink



$V_{ES}$  is the volume fraction of exempt solvent in ink, in gallon of exempt solvent per gallon of ink.

c. Emission Limitation:

The VOC content of the inks employed in the printing line(s) shall not exceed 25% VOC by volume of the volatile matter in the ink.

Applicable Compliance Method:

Compliance with the VOC content limitation shall be demonstrated by the record keeping requirements established in d)(2). If required, compliance with the VOC content limitation shall be determined using U.S. EPA Method 24A for flexographic and rotogravure printing inks and coatings or the formulation data from the manufacturer, the VOC content shall be calculated as follows:

$$C_{VOC,6} = (100)(V_{VOC}) / V_{VM}$$

Where:

$C_{VOC,6}$  is the VOC content in percentage VOC by volume of the volatile matter

$V_{VOC}$  is the volume fraction of VOC in the ink, calculated as:

$$V_{VOC} = V_{VM} - V_W - V_{ES}$$

$V_{VM}$  is the volume fraction of volatile matter in ink, in gallon of volatile matter per gallon of ink

$V_W$  is the volume fraction of water in ink, in gallon of water per gallon of ink

$V_{ES}$  is the volume fraction of exempt solvent in ink, in gallon of exempt solvent per gallon of ink.

- (2) Compliance with the coating usage limitation in c)(1) shall be demonstrated by the recordkeeping requirements specified in d)(1).

g) Miscellaneous Requirements

- (1) None.