State of Ohio Environmental Protection Agency

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

Street Address: Mailing Address: Lazarus Gov. Center
Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329

Application No: 14-05180

DATE: 2/12/2002

DI-NA-CAL Label Group Norwood Plant
Lonnie Grayson
4500 Beech St
Norwood, OH 45212-3498

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

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

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

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo

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

CC: USEPA **HCDES**

FINAL PERMIT TO INSTALL 14-05180

Application Number:	14-05180
APS Premise Number:	1431370116
Permit Fee:	**$400**
Name of Facility:	DI-NA-CAL Label Group Norwood Plant
Person to Contact:	Lonnie Grayson
Address:	4500 Beech St Norwood, OH 45212-3498

Location of proposed air contaminant source(s) [emissions unit(s)]:
4500 Beech Street
Norwood, Ohio

Description of proposed emissions unit(s):
Two new rotogravure printing lines.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install General Terms and Conditions

1. Monitoring and Related Recordkeeping and Reporting Requirements

a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

i. The date, place (as defined in the permit), and time of sampling or measurements.

ii. The date(s) analyses were performed.

iii. The company or entity that performed the analyses.

iv. The analytical techniques or methods used.

v. The results of such analyses.

vi. The operating conditions existing at the time of sampling or measurement.

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

c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

ii. Quarterly written reports of (i) any deviations from federally enforceable <u>emission limitations</u>, <u>operational restrictions</u>, <u>and control device operating parameter limitations</u>, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous

calendar quarters. See B.10 below if no deviations occurred during the quarter.

iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.
Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

6. General Requirements

a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d. This permit does not convey any property rights of any sort, or any exclusive privilege.

e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. Fees

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

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are

required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.

iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Permit To Operate Application

a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the source(s) covered by this permit.

11. Best Available Technology

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

12. Air Pollution Nuisance

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

B. State Only Enforceable Permit To Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

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

3. Permit Transfers

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

4. Termination of Permit To Install

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

5. Construction of New Sources(s)

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

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

6. Public Disclosure

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

7. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

8. Construction Compliance Certification

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

9. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

C. Permit To Install Summary of Allowable Emissions

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

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

Pollutant	Tons Per Year
VOC	99

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

1. Additional Terms and Conditions

The permittee shall operate a capture system and control device and demonstrate an overall organic HAP control efficiency of at least 95 percent for each month.

2. Additional Terms and Conditions

The permittee shall calculate the overall organic HAP control efficiency (R) as follows

R = (EF)/100

E = oxidizer destruction efficiency using the procedures in 40 CFR 63.827(d).
F = the capture system capture efficiency in accordance with 40 CFR 63.827(e) - (f).

3. Operational Restrictions

At all times, including periods of startup, shutdown, and malfunction, the affected source, including associated pollution control equipment shall be operated and maintained in a manner consistent with good air pollution control practices.

4. Operational Restrictions

Malfunctions shall be corrected as soon as practicable after their occurrence in accordance with the startup, shutdown, and malfunction plan.

5. Operational Restrictions

During periods of startup, shutdown, and malfunction, the affected source shall be operated and maintained in accordance with the procedures specified in the startup, shutdown, and malfunction plan.

6. Operational Restrictions

The permittee shall maintain and operate the continuous temperature monitoring device in a manner consistent with good air pollution control practices. The permittee shall ensure immediate repair or replacement of parts to correct routine or otherwise predictable malfunctions as defined in the source's startup, shutdown, and malfunction plan. The permittee shall keep the necessary parts for routine repairs of the affected equipment readily available.

7. Operational Restrictions

The permittee shall secure any bypass line valve in the closed position with a car-seal or a lock-and-key type configuration; or shall ensure that any bypass line valve or damper is in the closed position through continuous monitoring of valve position.

8. Monitoring and/or Recordkeeping Requirements

The permittee shall install, calibrate, operate and maintain a temperature monitoring device equipped with a continuous recorder. The device shall have an accuracy of ±1 percent of the temperature being monitored in °C or ±1 °C, whichever is greater. The thermocouple or temperature sensor shall be installed in the combustion chamber at a location in the combustion zone of the thermal oxidizer.

All temperature monitoring equipment shall be installed, calibrated, maintained and operated according to manufacturers specifications. The calibration of the chart recorder, data logger, or temperature indicator shall be verified every three months; or the chart recorder, data logger, or temperature indicator shall be replaced. The replacement shall be done either if the permittee chooses not to perform the calibration, or if the equipment cannot be calibrated properly.

9. Monitoring and/or Recordkeeping Requirements

The average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit is in operation, shall not be less 1500 degrees Fahrenheit or the temperature established as part of the most recent Notification of Compliance Status Report submitted pursuant to 40 CFR Part 63 Subpart KK.

10. Monitoring and/or Recordkeeping Requirements

The permittee has demonstrated that the emissions unit is equipped with a permanent total enclosure with no natural draft openings. Thus, there is no relevant operating parameter to be monitored to demonstrate capture.

Per 40 CFR 63.828(a)(5) the permittee shall submit a plan to USEPA which states there is no relevant operating parameter to monitor to demonstrate capture. The permittee then shall follow this plan if no comments are received from USEPA [40 CFR 63.828(a)(5)(iii)]. If USEPA denies the request then the permittee shall meet the monitoring requirements in 40 CFR Part 63 Subpart KK.

11. Monitoring and/or Recordkeeping Requirements

The permittee shall maintain monthly records of the following information for the "affected source:"

a. The sum of the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on intermittently-controllable work stations in bypass mode, M_{Bi}.

b. The sum of the mass of all solvents, reducers, thinners, and other diluents which are applied on intermittently-controllable work stations in bypass mode, M_{Bj}.

c. The sum of the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on intermittently-controllable work stations in controlled mode and the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on always-controlled work stations during the month, M_{Ci}.

d. The sum of the mass of all solvents, reducers, thinners, and other diluents which are applied on intermittently-controllable work stations in controlled mode and the mass of all solvents, reducers, thinners, and other diluents which are applied on always- controlled work stations during the month, M_{Cj}.

e. The monthly organic HAP emissions using the following equation:

$$H = \left[\left[\sum_{i=1}^{P} M_{Ci} C_{hi} + \sum_{j=1}^{q} M_{Cj} C_{hj}\right]\right] \left[\left[1 - (E/100 * F/100)\right]\right] + \left[\left[\sum_{i=1}^{P} M_{Bi} C_{hi} + \sum_{j=1}^{q} M_{Bj} C_{hj}\right]\right]$$

where,

H = the total monthly organic HAP emissions, kg.
Chi = the organic HAP content of ink or other solids-containing material, i, expressed as a weight-fraction, kg/kg.
Chj = the organic HAP content of solvent j, expressed as a weight-fraction, kg/kg.
E = the organic volatile matter control efficiency of the control device, percent.
F = the organic volatile matter capture efficiency of the capture system, percent.
MBi = the sum of the mass of solids-containing material, i, applied on intermittently-controllable work stations operating in bypass mode.
MBj = the sum of the mass of solvent, thinner, reducer, diluent, or other non-solids-containing material, j, applied on intermittently-controllable work stations operating in bypass mode.
Mci = the sum of the mass of solids-containing material, i, applied on intermittently-controllable work stations operating in controlled mode and the mass of solids-containing material, i, applied on always-controlled work stations, in a month, kg.
Mcj = the sum of the mass of solvent, thinner, reducer, diluent, or other non-solids-containing material, j, applied on intermittently-controllable work stations operating in

controlled mode and the mass of solvent, thinner, reducer, diluent, or other non-solids-containing material, j, applied on always-controlled work stations in a month, kg

f. The monthly organic HAP usage using the following equation:

$$\text{Monthly usage} = \left[\!\left[\sum_{j=1}^{P} M_{Ci} C_{hi} + \sum_{i=1}^{q} M_{Cj} C_{hj} \right]\!\right] + \left[\!\left[\sum_{j=1}^{P} M_{Bi} C_{hi} + \sum M_{Bj} C_{hj} \right]\!\right]$$

g. The monthly overall organic HAP control efficiency calculated using the following equation:

Monthly overall organic HAP control efficiency =

{1 - [H from (e) / monthly HAP usage from (f)]} * 100

12. Monitoring and/or Recordkeeping Requirements

The permittee shall develop and implement a written startup, shutdown, and malfunction plan that describes, in detail, procedures for operating and maintaining the source during periods of startup, shutdown, and malfunction and a program of corrective action for malfunctioning process and air pollution control equipment.

13. Monitoring and/or Recordkeeping Requirements

The permittee shall maintain records of the following:

a. The permittee shall maintain records of occurrence and duration of each startup, shutdown, and malfunction of air pollution control equipment.

b. If the actions taken by the permittee during a startup, shutdown, or malfunction are consistent with the procedures specified in the affected source's startup, shutdown, and malfunction plan, the permittee shall keep records for that event that demonstrate that the procedures specified in the plan were followed. These records may take the form of a "checklist," or other effective form of recordkeeping, that confirms conformance with the startup, shutdown, and malfunction plan for that event.

c. If the actions taken by the permittee during a startup, shutdown, or malfunction are not consistent with the procedures specified in the affected source's startup, shutdown, and malfunction plan, the permittee shall maintain relevant records of the actions taken during the startup, shutdown, or malfunction.

14. Monitoring and/or Recordkeeping Requirements

The permittee shall keep the written startup, shutdown, and malfunction plan on record to be made available for inspection, upon request, by the Administrator for the life of the affected source or until the affected source is no longer subject to the provisions of 40 CFR Part 63

Subpart KK. If the startup, shutdown, and malfunction plan is revised, the permittee shall keep the previous versions of the startup, shutdown, and malfunction plan on record, to be made available for inspection, upon request, by the Administrator, for a period of 5 years after each revision to the plan.

15. Monitoring and/or Recordkeeping Requirements

If the startup, shutdown, and malfunction plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction but was not included in the startup, shutdown, and malfunction plan at the time the owner or operator developed the plan, the owner or operator shall revise the startup, shutdown, and malfunction plan within 45 days after the event to include detailed procedures for operating and maintaining the source during similar malfunction events and a program of corrective action for similar malfunctions of process or air pollution control equipment.

16. Monitoring and/or Recordkeeping Requirements

The permittee shall maintain relevant records of the following:

a. Each period during which the continuous temperature monitoring device is malfunctioning or inoperative (including out-of-control periods).

b. All required measurements needed to demonstrate compliance with a relevant standard (including, but not limited to, 15-minute averages of continuous temperature monitoring device data, raw performance testing measurements, and raw performance evaluation measurements, that support data that the source is required to report).

c. All results of the continuous temperature monitoring device performance evaluations.

d. All continuous temperature monitoring device calibration checks.

e. All adjustments and maintenance performed on the continuous temperature monitoring device.

17. Monitoring and/or Recordkeeping Requirements

The permittee shall maintain relevant records of all maintenance performed on air pollution control equipment.

18. Monitoring and/or Recordkeeping Requirements

The permittee shall conduct monthly inspections of the seal or closure mechanism on each bypass line valve to ensure that the valve or damper is/are maintained in the closed position and the exhaust system is not diverted through the bypass line; or the monitoring system shall be inspected at least once every month to ensure that it is functioning properly.

19. Reporting Requirements

If actions taken by an owner or operator during a startup, shutdown, or malfunction of an affected source (including actions taken to correct a malfunction) are consistent with the procedures specified in the source's startup, shutdown, and malfunction plan, the owner or operator shall state such information in a startup, shutdown, and malfunction report. Reports shall only be required if a startup, shutdown, or malfunction occurred during the reporting period. The startup, shutdown, and malfunction report shall consist of a letter, containing the name, title, and signature of the owner or operator or other responsible official who is certifying its accuracy, that shall be submitted to the Administrator semiannually. The startup, shutdown, and malfunction report shall be delivered or postmarked by the 30th day following the end of each calendar half.

20. Reporting Requirements

If the actions taken by the permittee during a startup, shutdown, or malfunction are not consistent with the procedures specified in the affected source's startup, shutdown, and malfunction plan, the permittee shall report such actions. The immediate report required shall consist of a telephone call [or facsimile (FAX) transmission] to the Administrator within 2 working days after commencing actions inconsistent with the plan, and it shall be followed by a letter, delivered or postmarked within 7 working days after the end of the event, that contains the name, title, and signature of the owner or operator or other responsible official who is certifying its accuracy, explaining the circumstances of the event, the reasons for not following the startup, shut-down, and malfunction plan, and whether any excess emissions and/or parameter monitoring exceedances are believed to have occurred.

21. Reporting Requirements

For those malfunctions or other events that affect the temperature monitoring device equipped with a continuous recorder and are not addressed by the startup, shutdown, and malfunction plan, the owner or operator shall report actions that are not consistent with the startup, shutdown, and malfunction plan within 24 hours after commencing actions inconsistent with the plan to the Administrator. The owner or operator shall send a follow-up report within 2 weeks after commencing actions inconsistent with the plan that either certifies that corrections have been made or includes a corrective action plan and schedule. The owner or operator shall provide proof that repair parts have been ordered or any other records that would indicate that the delay in making repairs is beyond his or her control.

22. Reporting Requirements

The permittee shall submit an "excess emissions and continuous monitoring system performance report" and/or a "summary report" semi-annually, subject to the conditions specified in (a) or (b), whichever is applicable for the semi-annual reporting period to the Administrator.

a. If the total duration of excess emissions or process or control system parameter exceedances for the reporting period is less than 1 percent of the total operating time for

the reporting period, and continuous temperature monitoring device downtime for the reporting period is less than 5 percent of the total operating time for the reporting period, only the summary report shall be submitted, and the full excess emissions and continuous monitoring system performance report need not be submitted unless required by the Administrator.

b. If the total duration of excess emissions or process or control system parameter exceedances for the reporting period is 1 percent or greater of the total operating time for the reporting period, or the total continuous temperature monitoring device downtime for the reporting period is 5 percent or greater of the total operating time for the reporting period, both the summary report and the excess emissions and continuous monitoring system performance report shall be submitted.

These reports shall be delivered or post-marked by the 30th day following the end of each calendar half. When no excess emissions or exceedances of a parameter have occurred, or a continuous temperature monitoring device has not been inoperative, out of control, repaired, or adjusted, such information shall be stated in the report.

23. Reporting Requirements

The excess emissions and continuous monitoring system performance report shall contain the following information:

a. The date and time identifying each period during which the continuous temperature monitoring device was inoperative except for zero (low-level) and high-level checks.

b. The date and time identifying each period during which the continuous temperature monitoring device was out of control, as defined in §63.8(c)(7).

c. The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions and parameter monitoring exceedances, as defined in the relevant standard(s), that occurs during startups, shutdowns, and malfunctions of the affected source.

d. The specific identification (i.e., the date and time of commencement and completion) of each time period of excess emissions and parameter monitoring exceedances, as defined in the relevant standard(s), that occurs during periods other than startups, shut-downs, and malfunctions of the affected source.

e. The nature and cause of any malfunction (if known).

f. The corrective action taken or preventive measures adopted.

g. The nature of the repairs or adjustments to the continuous temperature monitoring device that was inoperative or out of control.

h. The total process operating time during the reporting period.

i. The name, title, and signature of the responsible official who is certifying the accuracy of the report.

24. Reporting Requirements

The summary report shall contain the following information:

a. The company name and address of the affected source.
b. An identification of each hazardous air pollutant monitored at the affected source.
c. The beginning and ending dates of the reporting period.
d. A brief description of the process units.
e. The operating parameter limitation: 95 percent overall HAP control efficiency for each month.
f. The monitoring equipment manufacturer(s) and model number(s).
g. The date of the latest continuous temperature monitoring device certification or audit.
h. The total operating time of the affected source during the reporting period.
i. An emission data summary (or similar summary if the owner or operator monitors control system parameters), including the total duration of excess emissions during the reporting period (recorded in minutes for opacity and hours for gases), the total duration of excess emissions expressed as a per-cent of the total source operating time during that reporting period, and a breakdown of the total duration of excess emissions during the reporting period into those that are due to startup/ shutdown, control equipment problems, process problems, other known causes, and other unknown causes.
j. A continuous temperature monitoring device performance summary (or similar summary if the owner or operator monitors control system parameters), including the total continuous temperature monitoring device down-time during the reporting period (recorded in minutes for opacity and hours for gases), the total duration of continuous temperature monitoring device downtime expressed as a percent of the total source operating time during that reporting period, and a break-down of the total continuous temperature monitoring device downtime during the reporting period into periods that are due to monitoring equipment malfunctions, non-monitoring equipment malfunctions, quality assurance/ quality control calibrations, other known causes, and other unknown causes.
k. A description of any changes in continuous temperature monitoring device, processes, or controls since the last reporting period.
l. The name, title, and signature of the responsible official who is certifying the accuracy of the report.
m. The date of the report.

25. Testing Requirements

The permittee may determine the volatile matter content of the materials based on formulation data, and may rely on volatile matter content data provided by material suppliers. In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR part 60, appendix A, Test Methods 24 or 24A shall be used unless the permitttee can

demonstrate to the satisfaction of the enforcement agency that the formulation data is correct.

26. Miscellaneous Requirements

In accordance with the provisions of 40 CFR §63.830(b)(5), the provisions of 40 CFR §63.6 through 40 CFR §63.10 do not apply unless a control device is used to comply with the standards in 40 CFR §63.825. Thus, the startup, shutdown and malfunction requirements of this permit apply to the startup, shutdown and malfunction of the control equipment only.

27. Miscellaneous Requirements

The "affected source" constitutes all product and packaging rotogravure presses at this facility.

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K006 - 11 station rotogravure printing press with total enclosure and regenerative thermal oxidizer - Press #102	OAC rule 3745-31-05 (A)(3)	Use of a total enclosure and oxidizer capable of maintaining an overall control efficiency of at least 95% by weight for VOC The requirements of this rule also include compliance with the requirements of 40 CFR Part 63 Subpart A and KK and OAC rule 3745-31-05(D).
	OAC rule 3745-31-05(D)	74.0 TPY VOC, based on a rolling, 12-month summation See Part III, term A.II.1
	40 CFR Part 63 Subpart A and KK	See Part II.A.1 - A.27.
	OAC rule 3745-21-09(Y)(1)(b)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to 40 CFR Part 63 Subpart KK.

2. Additional Terms and Conditions

2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of a total

enclosure and oxidizer to control emissions and compliance with 40 CFR 63 Subpart KK.

II. Operational Restrictions

1. The maximum annual VOC input for this emissions unit shall not exceed 2,960,000 pounds per year including liquid organic cleanup material, based upon a rolling, 12- month summation of the VOC input figures.

   To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the VOC input levels specified in the following table:

Month	Maximum Allowable Cumulative VOC Input, In Pounds
1	455,300
1-2	683,000
1-3	910,700
1-4	1,138,400
1-5	1,366,100
1-6	1,593,800
1-7	1,821,500
1-8	2,049,200
1-9	2,276,900
1-10	2,504,600
1-11	2,732,300
1-12	2,960,000

   After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual VOC input limitation shall be based upon a rolling, 12- month summation of the VOC input figures.

2. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be less 1500 degrees Fahrenheit or the temperature established as part of the most recent Notification of Compliance Status submitted pursuant to 40 CFR Part 63 Subpart KK, whichever is lower.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information:

   a. The total pounds of each coating, ink and cleanup material employed.

b. The VOC content, in percent by weight for each coating, ink and cleanup material.

c. The total VOC input to this emissions unit, in pounds per month (a x b).

d. The rolling, 12-month summation of the total VOC input in pounds.

Also during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative VOC input for each calendar month.

2. The permittee shall collect and record the following information for each day for the control equipment:

a. A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

b. All 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below 1500 degrees Fahrenheit or the temperature established as part of the most recent Notification of Compliance Status submitted pursuant to 40 CFR Part 63 Subpart KK, whichever is lower.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month summation total VOC input limitation and for the the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative VOC input levels in term A.II.1.

2. The permittee shall submit quarterly summaries of the following records:

a. A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

b. All 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, does not comply with the temperature limitation specified in term A.II.2.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

3. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the VOC usage limit in term A.II.1 shall be demonstrated by the recordkeeping

in term A.III.1.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K006 - 11 station rotogravure printing press with total enclosure and regenerative thermal oxidizer	None	

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K007 - 10 station rotogravure printing press with total enclosure and regenerative thermal oxidizer - Press #103	OAC rule 3745-31-05 (A)(3)	Use of a total enclosure and oxidizer capable of maintaining an overall control efficiency of at least 95% by weight for VOC The requirements of this rule also include compliance with the requirements of 40 CFR Part 63 Subpart A and KK and OAC rule 3745-31-05(D).
	OAC rule 3745-31-05(D)	25.0 TPY VOC, based on a rolling, 12-month summation See Part III, term A.II.1
	40 CFR Part 63 Subpart A and KK	See Part II.A.1 - A.27.
	OAC rule 3745-21-09(Y)(1)(b)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to 40 CFR Part 63 Subpart KK.

2. Additional Terms and Conditions

Emissions Unit ID: K007

2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of a total enclosure and oxidizer to control emissions and compliance with 40 CFR 63 Subpart KK.

II. Operational Restrictions

1. The maximum annual VOC input for this emissions unit shall not exceed 1,000,000 pounds per year including liquid organic cleanup material, based upon a rolling, 12-month summation of the VOC input figures.

   To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the VOC input levels specified in the following table:

Month	Maximum Allowable Cumulative VOC Input, In Pounds
1	266,670
1-2	333,340
1-3	400,000
1-4	466,670
1-5	533,340
1-6	600,000
1-7	666,670
1-8	733,340
1-9	800,002
1-10	866,670
1-11	933,340
1-12	1,000,000

   After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual VOC input limitation shall be based upon a rolling, 12- month summation of the VOC input figures.

2. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be less 1500 degrees Fahrenheit or the temperature established as part of the most recent Notification of Compliance Status submitted pursuant to 40 CFR Part 63 Subpart KK, whichever is lower.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information:

   a. The total pounds of each coating, ink and cleanup material employed.

b. The VOC content, in percent by weight for each coating, ink and cleanup material.

c. The total VOC input to this emissions unit, in pounds per month (a x b).

d. The rolling, 12-month summation of the total VOC input in pounds.

Also during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative VOC input for each calendar month.

2. The permittee shall collect and record the following information for each day for the control equipment:

a. A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

b. All 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below 1500 degrees Fahrenheit or the temperature established as part of the most recent Notification of Compliance Status submitted pursuant to 40 CFR Part 63 Subpart KK, whichever is lower.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month summation total VOC input limitation and for the the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative VOC input levels in term A.II.1.

2. The permittee shall submit quarterly summaries of the following records:

a. A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

b. All 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, does not comply with the temperature limitation specified in term A.II.2.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

3. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the VOC usage limit in term A.II.1 shall be demonstrated by the recordkeeping in term A.III

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K007 - 10 station rotogravure printing press with total enclosure and regenerative thermal oxidizer		

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None