

Facility ID: 0868030047 Issuance type: Final State Permit To Operate

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

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

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

- [Go to Part II for Emissions Unit K001](#)
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Facility ID: 0868030047 Emissions Unit ID: K001 Issuance type: Final State Permit To Operate

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**Part II - Special Terms and Conditions**

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) None.
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) None.

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

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

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/Requirements</u>      | <u>Applicable Emissions Limitations/Control Measures</u>   |
|---|---|--|
| #2434 66" x 100" rotary die cutter            | OAC rule 3745-31-05(A)(3)<br>PTI 08-04256 | 0.51 lb/hr volatile organic compounds excluding cleanup;<br>3.04 tons VOC/yr including cleanup<br><br>1.67 tons VOC/month including cleanup combined, for K001, K002, K003, K004, K005, K006 and K007<br><br>20 tons VOC/yr including cleanup combined, for K001, K002, K003, K004, K005, K006 and K007<br><br>The requirement of this rule also include compliance with the requirements of OAC rule 3745-21-09(Y)(1)(a)(i).<br><br>VOC content of each coating and ink not to exceed 40 percent VOC by volume of the coating and ink, excluding water and exempt solvents, as applied. |

OAC rule 3745-21-09(Y)(1)(a)(i)

2. **Additional Terms and Conditions**
  - (b) The 0.51 lb/hr limitation specified in this permit was established to reflect the potential to emit for the emissions unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with this limitation.

**B. Operational Restrictions**

1. None

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

1. The permittee shall collect and record the following information each month for K001, K002, K003, K004, K005, K006 and K007 combined:
  - a. The name and identification number of each ink, adhesive and cleanup material, employed.
  - b. The VOC content of each ink, in percent VOC by volume of the ink, excluding water and exempt solvents, as applied [calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for CVOC,5].
  - c. The VOC content of each adhesive and cleanup material, as applied, in pounds per gallon.

- d. The number of gallons of each adhesive cleanup material employed.
- e. The number of gallons, excluding water and exempt solvents, of each ink employed.
- f. The total VOC emissions from all inks, adhesive and cleanup materials, in pounds or tons.

**D. Reporting Requirements**

1. 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 and inks (for VOC content). 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.
2. In accordance with Paragraph 3 of the General Terms and Conditions, the permittee shall submit quarterly deviation (excursion) reports that identify each month during which the total VOC emission rate for the combined emissions unit exceeded 1.67 tons/month, and the actual VOC emission rate for each such month.

**E. Testing Requirements**

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

Emission Limitation-  
40% VOC by volume of the ink, excluding water and exempt solvents, as applied

Applicable Compliance Method-

Compliance shall be based upon the record keeping requirements specified in Section C. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24A shall be used to determine the VOC contents of the coatings and inks. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24A.

Emission Limitation-  
0.51 lb VOC/hr, excluding cleanup

Applicable Compliance Method-

Compliance shall be determined by multiplying the maximum hourly ink usage of 3.38 gallons times the maximum VOC content of the inks 0.15 lb VOC/gallon employed in this emissions unit.

Emission Limitation-  
3.04 tons VOC/yr, including cleanup

Applicable Compliance Method-

Compliance with the limitation above shall be determined as follows:

i. The total potential volatile organic emissions limitation from the ink was developed by multiplying the 0.51 lb/hr by a maximum annual operating schedule of 8760 hours and dividing by 2000 lbs/ton.

ii. The total volatile organic emissions limitation from the cleanup was determined by multiplying the maximum annual cleanup usage of 234 gallons times the maximum VOC content of the cleanup material 6.89 lb VOC/gallon employed in this emissions unit and dividing by 2000 lbs/ton.

iii. The annual VOC emissions rate, including cleanup (in tons) shall be the sum of the i and ii.

Emission Limitation-  
1.67 tons VOC/month, including cleanup combined

Applicable Compliance Method-

Compliance shall be based upon the record keeping requirements specified in Section C.

Emission Limitation-  
20 tons VOC/yr, including cleanup combined

Applicable Compliance Method-

Compliance shall be based upon the record keeping requirements specified in Section C., and shall be the sum of the 12 monthly VOC emission rates for the calendar year.

**F. Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install 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 pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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Facility ID: 0868030047 Emissions Unit ID: K002 Issuance type: Final State Permit To Operate

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**Part II - Special Terms and Conditions**

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) None.
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) None.

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

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

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/Requirements</u>      | <u>Applicable Emissions Limitations/Control Measures</u>   |
|---|---|--|
| #5184- 50" x 110" flexo-folder gluer          | OAC rule 3745-31-05(A)(3)<br>PTI 08-04256 | 0.82 lb/hr volatile organic compounds excluding cleanup;<br>4.85 tons VOC/yr including cleanup<br><br>1.67 tons VOC/month including cleanup combined, for K001, K002, K003, K004, K005, K006 and K007<br><br>20 tons VOC/yr including cleanup combined, for K001, K002, K003, K004, K005, K006 and K007<br><br>The requirement of this rule also include compliance with the requirements of OAC rule 3745-21-09(Y)(1)(a)(i).<br><br>VOC content of each coating and ink not to exceed 40 percent VOC by volume of the coating and ink, excluding water and exempt solvents, as applied. |
|   | OAC rule 3745-21-09(Y)(1)(a)(i)           |  |

**2. Additional Terms and Conditions**

- (b) The 0.82 lb/hr limitation specified in this permit was established to reflect the potential to emit for the emissions unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with this limitation.

**B. Operational Restrictions**

1. None

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

1. The permittee shall collect and record the following information each month for K001, K002, K003, K004, K005, K006 and K007 combined:
  - a. The name and identification number of each ink, adhesive and cleanup material, employed.
  - b. The VOC content of each ink, in percent VOC by volume of the ink, excluding water and exempt solvents, as applied [calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for CVOC,5].
  - c. The VOC content of each adhesive and cleanup material, as applied, in pounds per gallon.
  - d. The number of gallons of each adhesive cleanup material employed.
  - e. The number of gallons, excluding water and exempt solvents, of each ink employed.
  - f. The total VOC emissions from all inks, adhesive and cleanup materials, in pounds or tons.

**D. Reporting Requirements**

1. 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 and inks (for VOC content). 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.
2. In accordance with Paragraph 3 of the General Terms and Conditions, the permittee shall submit quarterly deviation (excursion) reports that identify each month during which the total VOC emission rate for the combined emissions unit exceeded 1.67 tons/month, and the actual VOC emission rate for each such month.

**E. Testing Requirements**

1. Compliance with the emission limitation(s) specified in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):  
Emission Limitation-  
40% VOC by volume of the ink, excluding water and exempt solvents, as applied  
  
Applicable Compliance Method-  
Compliance shall be based upon the record keeping requirements specified in Section C. In accordance with

OAC rule 3745-21-04(B)(5), USEPA Method 24A shall be used to determine the VOC contents of the coatings and inks. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24A.

Emission Limitation-  
0.82 lb VOC/hr, excluding cleanup

Applicable Compliance Method-  
Compliance with the limitation above shall be determined as follows:

i. The total potential volatile organic emissions rate from the ink was developed by multiplying the maximum hourly ink usage of 5.15 gallons times the maximum VOC content of the inks 0.15 lb VOC/gallon employed in this emissions unit.

ii. The total potential volatile organic emissions from the adhesive was developed by multiplying the maximum hourly adhesive usage of 0.68 gallons times the maximum VOC content of the adhesive 0.0751 lb VOC/gallon employed in this emissions unit.

iii. The maximum hourly VOC emissions rate, in pounds shall then be the sum of i and ii.

Emission Limitation-  
4.85 tons VOC/yr, including cleanup

Compliance with the limitation above shall be determined as follows:

i. The total potential volatile organic emissions rate from the ink and adhesive was developed by multiplying the 0.82 lb/hr by a maximum annual operating schedule of 8760 hours and dividing by 2000 lbs/ton.

ii. The total volatile organic emissions from the cleanup was determined by multiplying the maximum annual cleanup usage of 356 gallons times the maximum VOC content of the cleanup material 6.89 lb VOC/gallon employed in this emissions unit and dividing by 2000 lbs/ton.

iii. The annual VOC emissions rate, including cleanup (in tons) shall be the sum of i and ii.

Emission Limitation-  
1.67 tons VOC/month, including cleanup combined

Applicable Compliance Method-  
Compliance shall be based upon the record keeping requirements specified in Section C.

Emission Limitation-  
20 tons VOC/yr, including cleanup combined

Applicable Compliance Method-  
Compliance shall be based upon the record keeping requirements specified in Section C., and shall be the sum of the 12 monthly VOC emission rates for the calendar year.

#### F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install 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 pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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Facility ID: 0868030047 Emissions Unit ID: K003 Issuance type: Final State Permit To Operate

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#### Part II - Special Terms and Conditions

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) None.
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) None.

#### A. Applicable Emissions Limitations and/or Control Requirements

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

| <u>Operations, Property, and/or Equipment</u>   | <u>Applicable Rules/Requirements</u>      | <u>Applicable Emissions Limitations/Control Measures</u>   |
|---|---|--|
| #5144- 38" x 96" flexo-folder gluer   | OAC rule 3745-31-05(A)(3)<br>PTI 08-04256 | 0.70 lb/hr volatile organic compounds excluding cleanup;<br>4.12 tons VOC/yr including cleanup<br><br>1.67 tons VOC/month including cleanup combined, for K001, K002, K003, K004, K005, K006 and K007<br><br>20 tons VOC/yr including cleanup combined, for K001, K002, K003, K004, K005, K006 and K007<br><br>The requirement of this rule also include compliance with the requirements of OAC rule 3745-21-09(Y)(1)(a)(i).<br><br>VOC content of each coating and ink not to exceed 40 percent VOC by volume of the coating and ink, excluding water and exempt solvents, as applied. |
| OAC rule 3745-21-09(Y)(1)(a)(i)   |   |  |
| <b>2. Additional Terms and Conditions</b>   |   |  |
| <ul style="list-style-type: none"> <li>(b) The 0.70 lb/hr limitation specified in this permit was established to reflect the potential to emit for the emissions unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with this limitation.</li> </ul>  |   |  |
| <b>B. Operational Restrictions</b>  |   |  |
| <ul style="list-style-type: none"> <li>1. None</li> </ul>   |   |  |
| <b>C. Monitoring and/or Record Keeping Requirements</b>   |   |  |
| <ul style="list-style-type: none"> <li>1. The permittee shall collect and record the following information each month for K001, K002, K003, K004, K005, K006 and K007 combined: <ul style="list-style-type: none"> <li>a. The name and identification number of each ink, adhesive and cleanup material, employed.</li> <li>b. The VOC content of each ink, in percent VOC by volume of the ink, excluding water and exempt solvents, as applied [calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for CVOC,5].</li> <li>c. The VOC content of each adhesive and cleanup material, as applied, in pounds per gallon.</li> <li>d. The number of gallons of each adhesive cleanup material employed.</li> <li>e. The number of gallons, excluding water and exempt solvents, of each ink employed.</li> <li>f. The total VOC emissions from all inks, adhesive and cleanup materials, in pounds or tons.</li> </ul> </li> </ul>  |   |  |
| <b>D. Reporting Requirements</b>  |   |  |
| <ul style="list-style-type: none"> <li>1. 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 and inks (for VOC content). 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.</li> <li>2. In accordance with Paragraph 3 of the General Terms and Conditions, the permittee shall submit quarterly deviation (excursion) reports that identify each month during which the total VOC emission rate for the combined emissions unit exceeded 1.67 tons/month, and the actual VOC emission rate for each such month.</li> </ul>  |   |  |
| <b>E. Testing Requirements</b>  |   |  |
| <ul style="list-style-type: none"> <li>1. Compliance with the emission limitation(s) specified in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):<br/>Emission Limitation-<br/>40% VOC by volume of the ink, excluding water and exempt solvents, as applied<br/><br/>Applicable Compliance Method-<br/>Compliance shall be based upon the record keeping requirements specified in Section C. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24A shall be used to determine the VOC contents of the coatings and inks. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24A.<br/>Emission Limitation-<br/>0.70 lb VOC/hr, excluding cleanup<br/><br/>Applicable Compliance Method-<br/>Compliance with the limitation above shall be determined as follows: <ul style="list-style-type: none"> <li>i. The total potential volatile organic emissions rate from the ink was developed by multiplying the maximum hourly ink usage of 4.41 gallons times the maximum VOC content of the inks 0.15 lb VOC/gallon employed in this emissions unit.</li> <li>ii. The total potential volatile organic emissions from the adhesive was developed by multiplying the maximum hourly adhesive usage of 0.58 gallons times the maximum VOC content of the adhesive 0.0751 lb VOC/gallon employed in this emissions unit.</li> </ul> </li> </ul> |   |  |

iii. The maximum hourly VOC emissions rate, in pounds shall then be the sum of i and ii.  
 Emission Limitation-  
 4.12 tons VOC/yr, including cleanup

Applicable Compliance Method-  
 Compliance with the limitation above shall be determined as follows:

i. The total potential volatile organic emissions rate from the ink and adhesive was developed by multiplying the 0.70 lb/hr by a maximum annual operating schedule of 8760 hours and dividing by 2000 lbs/ton.

ii. The total volatile organic emissions from the cleanup was determined by multiplying the maximum annual cleanup usage of 305 gallons times the maximum VOC content of the cleanup material 6.89 lb VOC/gallon employed in this emissions unit and dividing by 2000 lbs/ton.

iii. The annual VOC emissions rate, including cleanup (in tons) shall be the sum of i and ii.  
 Emission Limitation-  
 1.67 tons VOC/month, including cleanup combined

Applicable Compliance Method-  
 Compliance shall be based upon the record keeping requirements specified in Section C.  
 Emission Limitation-  
 20 tons VOC/yr, including cleanup combined

Applicable Compliance Method-  
 Compliance shall be based upon the record keeping requirements specified in Section C., and shall be the sum of the 12 monthly VOC emission rates for the calendar year.

**F. Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install 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 pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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**Facility ID: 0868030047 Emissions Unit ID: K004 Issuance type: Final State Permit To Operate**

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**Part II - Special Terms and Conditions**

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) None.
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) None.

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

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

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/Requirements</u>      | <u>Applicable Emissions Limitations/Control Measures</u>   |
|---|---|--|
| #5104- 37" x 96" flexo-folder gluer           | OAC rule 3745-31-05(A)(3)<br>PTI 08-04256 | 0.59 lb/hr volatile organic compounds excluding cleanup;<br>3.47 tons VOC/yr including cleanup<br><br>1.67 tons VOC/month including cleanup combined, for K001, K002, K003, K004, K005, K006 and K007<br><br>20 tons VOC/yr including cleanup combined, for K001, K002, K003, K004, K005, K006 and K007<br><br>The requirement of this rule also include compliance with the requirements of OAC rule 3745-21-09(Y)(1) (a)(i). |

VOC content of each coating and ink not to exceed 40 percent VOC by volume of the coating and ink, excluding water and exempt solvents, as applied.

OAC rule 3745-21-09(Y)(1)(a)(i)

2. **Additional Terms and Conditions**
- (b) The 0.59 lb/hr limitation specified in this permit was established to reflect the potential to emit for the emissions unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with this limitation.
- B. Operational Restrictions**
1. None
- C. Monitoring and/or Record Keeping Requirements**
1. The permittee shall collect and record the following information each month for K001, K002, K003, K004, K005, K006 and K007 combined:
- The name and identification number of each ink, adhesive and cleanup material, employed.
  - The VOC content of each ink, in percent VOC by volume of the ink, excluding water and exempt solvents, as applied [calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for CVOC,5].
  - The VOC content of each adhesive and cleanup material, as applied, in pounds per gallon.
  - The number of gallons of each adhesive cleanup material employed.
  - The number of gallons, excluding water and exempt solvents, of each ink employed.
  - The total VOC emissions from all inks, adhesive and cleanup materials, in pounds or tons.
- D. Reporting Requirements**
- 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 and inks (for VOC content). 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.
  - In accordance with Paragraph 3 of the General Terms and Conditions, the permittee shall submit quarterly deviation (excursion) reports that identify each month during which the total VOC emission rate for the combined emissions unit exceeded 1.67 tons/month, and the actual VOC emission rate for each such month.
- E. Testing Requirements**
- Compliance with the emission limitation(s) specified in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):  
Emission Limitation-  
40% VOC by volume of the ink, excluding water and exempt solvents, as applied  
  
Applicable Compliance Method-  
Compliance shall be based upon the record keeping requirements specified in Section C. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24A shall be used to determine the VOC contents of the coatings and inks. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24A.  
Emission Limitation-  
0.59 lb VOC/hr, excluding cleanup  
  
Applicable Compliance Method-  
Compliance with the limitation above shall be determined as follows:  
  
i. The total potential volatile organic emissions rate from the ink was developed by multiplying the maximum hourly ink usage of 3.68 gallons times the maximum VOC content of the inks 0.15 lb VOC/gallon employed in this emissions unit.  
  
ii. The total potential volatile organic emissions from the adhesive was developed by multiplying the maximum hourly adhesive usage of 0.47 gallons times the maximum VOC content of the adhesive 0.0751 lb VOC/gallon employed in this emissions unit.  
  
iii. The maximum hourly VOC emissions rate, in pounds shall then be the sum of i and ii.  
Emission Limitation-  
3.47 tons VOC/yr, including cleanup  
  
Applicable Compliance Method-  
Compliance with the limitation above shall be determined as follows:  
  
i. The total potential volatile organic emissions rate from the ink and adhesive was developed by multiplying the 0.59 lb/hr by a maximum annual operating schedule of 8760 hours and dividing by 2000 lbs/ton.  
ii. The total volatile organic emissions from the cleanup was determined by multiplying the maximum annual cleanup usage of 254 gallons times the maximum VOC content of the cleanup material 6.89 lb VOC/gallon employed in this emissions unit and dividing by 2000 lbs/ton.  
  
iii. The annual VOC emissions rate, including cleanup (in tons) shall be the sum of i and ii.  
Emission Limitation-

1.67 tons VOC/month, including cleanup combined

Applicable Compliance Method-  
Compliance shall be based upon the record keeping requirements specified in Section C.  
Emission Limitation-  
20 tons VOC/yr, including cleanup combined

Applicable Compliance Method-  
Compliance shall be based upon the record keeping requirements specified in Section C., and shall be the sum of the 12 monthly VOC emission rates for the calendar year.

**F. Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install 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 pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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Facility ID: 0868030047 Emissions Unit ID: K005 Issuance type: Final State Permit To Operate

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**Part II - Special Terms and Conditions**

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) None.
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) None.

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

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

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/Requirements</u>      | <u>Applicable Emissions Limitations/Control Measures</u>   |
|---|---|--|
| #2444- 66" x 80" rotary die cutter            | OAC rule 3745-31-05(A)(3)<br>PTI 08-04256 | 0.62 lb/hr volatile organic compounds excluding cleanup;<br>3.70 tons VOC/yr including cleanup<br><br>1.67 tons VOC/month including cleanup combined, for K001, K002, K003, K004, K005, K006 and K007<br><br>20 tons VOC/yr including cleanup combined, for K001, K002, K003, K004, K005, K006 and K007<br><br>The requirement of this rule also include compliance with the requirements of OAC rule 3745-21-09(Y)(1)(a)(i).<br><br>VOC content of each coating and ink not to exceed 40 percent VOC by volume of the coating and ink, excluding water and exempt solvents, as applied. |
|   | OAC rule 3745-21-09(Y)(1)(a)(i)           |  |

2. **Additional Terms and Conditions**
  - (b) The 0.62 lb/hr limitation specified in this permit was established to reflect the potential to emit for the emissions unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with this limitation.

**B. Operational Restrictions**

1. None

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

1. The permittee shall collect and record the following information each month for K001, K002, K003, K004, K005,

K006 and K007 combined:

- a. The name and identification number of each ink, adhesive and cleanup material, employed.
- b. The VOC content of each ink, in percent VOC by volume of the ink, excluding water and exempt solvents, as applied [calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for CVOC,5].
- c. The VOC content of each adhesive and cleanup material, as applied, in pounds per gallon.
- d. The number of gallons of each adhesive cleanup material employed.
- e. The number of gallons, excluding water and exempt solvents, of each ink employed.
- f. The total VOC emissions from all inks, adhesive and cleanup materials, in pounds or tons.

**D. Reporting Requirements**

1. 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 and inks (for VOC content). 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.
2. In accordance with Paragraph 3 of the General Terms and Conditions, the permittee shall submit quarterly deviation (excursion) reports that identify each month during which the total VOC emission rate for the combined emissions unit exceeded 1.67 tons/month, and the actual VOC emission rate for each such month.

**E. Testing Requirements**

1. Compliance with the emission limitation(s) specified in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):  
Emission Limitation-  
40% VOC by volume of the ink, excluding water and exempt solvents, as applied

Applicable Compliance Method-

Compliance shall be based upon the record keeping requirements specified in Section C. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24A shall be used to determine the VOC contents of the coatings and inks. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24A.

Emission Limitation-

0.62 lb VOC/hr, excluding cleanup

Applicable Compliance Method-

Compliance shall be determined by multiplying the maximum hourly ink usage of 4.12 gallons times the maximum VOC content of the inks 0.15 lb VOC/gallon employed in this emissions unit.

Emission Limitation-

3.70 tons VOC/yr, including cleanup

Applicable Compliance Method-

Compliance with the limitation above shall be determined as follows:

i. The total potential volatile organic emissions limitation from the ink was developed by multiplying the 0.62 lb/hr by a maximum annual operating schedule of 8760 hours and dividing by 2000 lbs/ton.

ii. The total volatile organic emissions limitation from the cleanup was determined by multiplying the maximum annual cleanup usage of 285 gallons times the maximum VOC content of the cleanup material 6.89 lb VOC/gallon employed in this emissions unit and dividing by 2000 lbs/ton.

iii. The annual VOC emissions rate, including cleanup (in tons) shall be the sum of the i and ii.

Emission Limitation-

1.67 tons VOC/month, including cleanup combined

Applicable Compliance Method-

Compliance shall be based upon the record keeping requirements specified in Section C.

Emission Limitation-

20 tons VOC/yr, including cleanup combined

Applicable Compliance Method-

Compliance shall be based upon the record keeping requirements specified in Section C., and shall be the sum of the 12 monthly VOC emission rates for the calendar year.

**F. Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install 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 pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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Facility ID: 0868030047 Emissions Unit ID: K006 Issuance type: Final State Permit To Operate

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**Part II - Special Terms and Conditions**

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) None.
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) None.

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

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

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/Requirements</u>      | <u>Applicable Emissions Limitations/Control Measures</u>   |
|---|---|--|
| #2494- 66" x 104" rotary die cutter           | OAC rule 3745-31-05(A)(3)<br>PTI 08-04256 | 0.68 lb/hr volatile organic compounds excluding cleanup;<br>4.07 tons VOC/yr including cleanup<br><br>1.67 tons VOC/month including cleanup combined, for K001, K002, K003, K004, K005, K006 and K007<br><br>20 tons VOC/yr including cleanup combined, for K001, K002, K003, K004, K005, K006 and K007<br><br>The requirement of this rule also include compliance with the requirements of OAC rule 3745-21-09(Y)(1)(a)(i).<br><br>VOC content of each coating and ink not to exceed 40 percent VOC by volume of the coating and ink, excluding water and exempt solvents, as applied. |
|   | OAC rule 3745-21-09(Y)(1)(a)(i)           |  |

**2. Additional Terms and Conditions**

- (b) The 0.68 lb/hr limitation specified in this permit was established to reflect the potential to emit for the emissions unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with this limitation.

**B. Operational Restrictions**

1. None

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

1. The permittee shall collect and record the following information each month for K001, K002, K003, K004, K005, K006 and K007 combined:
  - a. The name and identification number of each ink, adhesive and cleanup material, employed.
  - b. The VOC content of each ink, in percent VOC by volume of the ink, excluding water and exempt solvents, as applied [calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for CVOC,5].
  - c. The VOC content of each adhesive and cleanup material, as applied, in pounds per gallon.
  - d. The number of gallons of each adhesive cleanup material employed.
  - e. The number of gallons, excluding water and exempt solvents, of each ink employed.
  - f. The total VOC emissions from all inks, adhesive and cleanup materials, in pounds or tons.

**D. Reporting Requirements**

1. 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 and inks (for VOC content). 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.
2. In accordance with Paragraph 3 of the General Terms and Conditions, the permittee shall submit quarterly deviation (excursion) reports that identify each month during which the total VOC emission rate for the combined emissions unit exceeded 1.67 tons/month, and the actual VOC emission rate for each such month.

**E. Testing Requirements**

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

Emission Limitation-  
40% VOC by volume of the ink, excluding water and exempt solvents, as applied

Applicable Compliance Method-  
Compliance shall be based upon the record keeping requirements specified in Section C. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24A shall be used to determine the VOC contents of the coatings and inks. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24A.

Emission Limitation-  
0.68 lb VOC/hr, excluding cleanup

Applicable Compliance Method-  
Compliance shall be determined by multiplying the maximum hourly ink usage of 4.56 gallons times the maximum VOC content of the inks 0.15 lb VOC/gallon employed in this emissions unit.

Emission Limitation-  
4.07 tons VOC/yr, including cleanup

Applicable Compliance Method-  
Compliance with the limitation above shall be determined as follows:

  - i. The total potential volatile organic emissions limitation from the ink was developed by multiplying the 0.68 lb/hr by a maximum annual operating schedule of 8760 hours and dividing by 2000 lbs/ton.
  - ii. The total volatile organic emissions limitation from the cleanup was determined by multiplying the maximum annual cleanup usage of 315 gallons times the maximum VOC content of the cleanup material 6.89 lb VOC/gallon employed in this emissions unit and dividing by 2000 lbs/ton.
  - iii. The annual VOC emissions rate, including cleanup (in tons) shall be the sum of the i and ii.

Emission Limitation-  
1.67 tons VOC/month, including cleanup combined

Applicable Compliance Method-  
Compliance shall be based upon the record keeping requirements specified in Section C.

Emission Limitation-  
20 tons VOC/yr, including cleanup combined

Applicable Compliance Method-  
Compliance shall be based upon the record keeping requirements specified in Section C., and shall be the sum of the 12 monthly VOC emission rates for the calendar year.

**F. Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install 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 pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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Facility ID: 0868030047 Emissions Unit ID: K007 Issuance type: Final State Permit To Operate

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**Part II - Special Terms and Conditions**

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) None.
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) None.

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

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

| <u>Operations, Property, and/or Equipment</u>  | <u>Applicable Rules/Requirements</u>      | <u>Applicable Emissions Limitations/Control Measures</u>   |
|--|---|--|
| #2424- 117" x 66" rotary die cutter  | OAC rule 3745-31-05(A)(3)<br>PTI 08-04256 | 0.77 lb/hr volatile organic compounds excluding cleanup;<br>4.60 tons VOC/yr including cleanup<br><br>1.67 tons VOC/month including cleanup combined, for K001, K002, K003, K004, K005, K006 and K007<br><br>20 tons VOC/yr including cleanup combined, for K001, K002, K003, K004, K005, K006 and K007<br><br>The requirement of this rule also include compliance with the requirements of OAC rule 3745-21-09(Y)(1)(a)(i).<br><br>VOC content of each coating and ink not to exceed 40 percent VOC by volume of the coating and ink, excluding water and exempt solvents, as applied. |
| OAC rule 3745-21-09(Y)(1)(a)(i)  |   |  |
| <b>2. Additional Terms and Conditions</b>  |   |  |
| <ul style="list-style-type: none"> <li>(b) The 0.77 lb/hr limitation specified in this permit was established to reflect the potential to emit for the emissions unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with this limitation.</li> </ul>   |   |  |
| <b>B. Operational Restrictions</b>   |   |  |
| <ul style="list-style-type: none"> <li>1. None</li> </ul>  |   |  |
| <b>C. Monitoring and/or Record Keeping Requirements</b>  |   |  |
| <ul style="list-style-type: none"> <li>1. The permittee shall collect and record the following information each month for K001, K002, K003, K004, K005, K006 and K007 combined: <ul style="list-style-type: none"> <li>a. The name and identification number of each ink, adhesive and cleanup material, employed.</li> <li>b. The VOC content of each ink, in percent VOC by volume of the ink, excluding water and exempt solvents, as applied [calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for CVOC,5].</li> <li>c. The VOC content of each adhesive and cleanup material, as applied, in pounds per gallon.</li> <li>d. The number of gallons of each adhesive cleanup material employed.</li> <li>e. The number of gallons, excluding water and exempt solvents, of each ink employed.</li> <li>f. The total VOC emissions from all inks, adhesive and cleanup materials, in pounds or tons.</li> </ul> </li> </ul>   |   |  |
| <b>D. Reporting Requirements</b>   |   |  |
| <ul style="list-style-type: none"> <li>1. 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 and inks (for VOC content). 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.</li> <li>2. In accordance with Paragraph 3 of the General Terms and Conditions, the permittee shall submit quarterly deviation (excursion) reports that identify each month during which the total VOC emission rate for the combined emissions unit exceeded 1.67 tons/month, and the actual VOC emission rate for each such month.</li> </ul>   |   |  |
| <b>E. Testing Requirements</b>   |   |  |
| <ul style="list-style-type: none"> <li>1. Compliance with the emission limitation(s) specified in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s): <ul style="list-style-type: none"> <li>Emission Limitation-<br/>40% VOC by volume of the ink, excluding water and exempt solvents, as applied</li> <li>Applicable Compliance Method-<br/>Compliance shall be based upon the record keeping requirements specified in Section C. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24A shall be used to determine the VOC contents of the coatings and inks. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24A.</li> <li>Emission Limitation-<br/>0.77 lb VOC/hr, excluding cleanup</li> <li>Applicable Compliance Method-<br/>Compliance shall be determined by multiplying the maximum hourly ink usage of 5.15 gallons times the maximum VOC content of the inks 0.15 lb VOC/gallon employed in this emissions unit.</li> <li>Emission Limitation-<br/>4.60 tons VOC/yr, including cleanup</li> <li>Applicable Compliance Method-<br/>Compliance with the limitation above shall be determined as follows: <ul style="list-style-type: none"> <li>i. The total potential volatile organic emissions limitation from the ink was developed by multiplying the 0.77</li> </ul> </li> </ul> </li> </ul> |   |  |

lb/hr by a maximum annual operating schedule of 8760 hours and dividing by 2000 lbs/ton.

ii. The total volatile organic emissions limitation from the cleanup was determined by multiplying the maximum annual cleanup usage of 356 gallons times the maximum VOC content of the cleanup material 6.89 lb VOC/gallon employed in this emissions unit and dividing by 2000 lbs/ton.

iii. The annual VOC emissions rate, including cleanup (in tons) shall be the sum of the i and ii.

Emission Limitation-

1.67 tons VOC/month, including cleanup combined

Applicable Compliance Method-

Compliance shall be based upon the record keeping requirements specified in Section C.

Emission Limitation-

20 tons VOC/yr, including cleanup combined

Applicable Compliance Method-

Compliance shall be based upon the record keeping requirements specified in Section C., and shall be the sum of the 12 monthly VOC emission rates for the calendar year.

**F. Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install 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 pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.