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

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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.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K007 - 2494 Titan Rotary Die Cutter	OAC rule 3745-31-05(A)(3) PTI 08-04703	The Volatile Organic Compound (VOC) emissions from this emissions unit shall not exceed 17.67 lbs/hr. The VOC emissions from this emissions unit shall not exceed 5 tons/yr, based upon a rolling, 12-month summation of the monthly VOC emissions from a combination of inks, additives and cleanup materials. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(Y)(2)(b) and OAC rule 3745-35-07(B). The Hazardous Air Pollutants (HAPs) emissions from emission units K001, K005, K006, K007, K008, and K009 shall not exceed 8.0 tons/yr for any individual HAP and 10.0 tons/yr for any combination of HAPs. (See A.2.c.)
	OAC rule 3745-21-09(Y)(2)(b)	See A.2.b.
	OAC rule 3745-35-07(B) (Synthetic minor to avoid Title V permitting requirements)	The VOC emission rate from emission units K001, K005, K006, K007, K008, and K009 shall not exceed 29.0 tons/yr, based upon a rolling, 12-month summation of the monthly VOC emissions from a combination of inks, additives and cleanup materials.

2. **Additional Terms and Conditions**

   (a) The 17.67 lbs/hr emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.
   The requirements of OAC rule 3745-21-09(Y)(1) shall not apply provided the total maximum usage of coating and inks in all flexographic, packaging rotogravure and publication rotogravure printing lines at this facility is less than or equal to one hundred forty-eight tons per year.
   The permittee has requested annual emissions limitations upon HAPs be established in this PTI to reflect the source's potential to emit (PTE), which is federally enforceable. The individual and combined HAPs limitations are based upon the PTE of the emissions units at the facility. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.

B. **Operational Restrictions**

1. The maximum annual volatile organic material usage for emission units K001, K005, K006, K007, K008, and K009 shall not exceed 29.0 tons per year, based upon a rolling, 12-month summation of the monthly volatile organic material usage figures from a combination of inks, additives and cleanup materials.

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

1. The permittee shall collect and record the following information each month on a facility-wide basis for emissions

units K001, K005, K006, K007, K008 and K009:

a. The name and identification number of each ink, additive and cleanup material employed.

b. The weight, in pound per month, of each ink, additive and cleanup material employed, as applied.

c. The VOC content of each ink, additive and cleanup material, as applied, in percent by weight.

d. The total volatile organic material usage and VOC emissions from all inks, additives and cleanup materials in pounds [summation of (b x c) for all inks + summation of (b x c) for all additives + summation of (b x c) for all cleanup materials].

e. The rolling, 12-month summation of volatile organic material usage and VOC emissions from all inks, additives and cleanup materials.

D. **Reporting Requirements**

1. The permittee shall submit annual reports that specify the total actual annual VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

2. The permittee shall submit quarterly deviation (excursion) reports that include the following:

a. An identification of each month during which the rolling, 12-month VOC emissions exceeded the 5.0 tons per year rolling 12-month emission limitation, and the actual rolling, 12 month VOC emissions for each such month.

b. An identification of each month during which the rolling, 12-month volatile organic material usage and VOC emissions exceeded the 29.0 tons per year rolling 12-month emission limitation, and the actual rolling, 12 month VOC emissions for each such month.

3. These quarterly deviation reports (excursion) reports shall be submitted to the Ohio EPA Central District Office or local air agency by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

E. **Testing Requirements**

1. Compliance with the specified emission limitations in Section A.1. of this permit shall be demonstrated in accordance with the following methods:
Emission limitation:
17.67 lbs VOC/hr from a combination of inks, additives and cleanup materials

Applicable Compliance Method:
This emission limitation is based upon the unit's potential to emit, which is determined by multiplying the maximum hourly inks, additives and cleanup usage rate times the maximum VOC contents (percent by weight).
Emission limitation:
5.0 tons VOC/yr from a combination of inks, additives and cleanup materials as a 12-month rolling summation.

Applicable Compliance Method:
Compliance with the annual VOC emission limitation shall be based on the record keeping requirements specified in section C.1.
Emission limitation:
29.0 tons VOC/yr from a combination of inks, additives and cleanup materials as a 12-month rolling summation.

Applicable Compliance Method:
Compliance with the annual VOC emission limitation shall be based on the record keeping requirements specified in section C.1.
Emission limitations:
8.0 tons/yr for any individual HAP and 10.0 tons/yr for any combination of HAPs from emission units K001, K005, K006, K007, K008, and K009.

Applicable Compliance Method:
The tons/yr limitations were developed by multiplying the short term PTE by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided that the short term PTE does not change, compliance with the annual PTE is assured.

F. **Miscellaneous Requirements**

1. The following terms and conditions are federally enforceable: A, B, C, D and E.