

Synthetic Minor Determination and/or **Netting Determination**

Permit To Install: 14-05855

Ampac Plastics Inc.

A. Source Description

Ampac Plastics, Inc. has submitted an application to install a new 6-color flexographic printing press, emissions unit K020. The press will use compliant coatings. The applicable regulations are OAC rules 3745-31-05(A)(3), 3745-31-05(C), 3745-21-09(Y)(1)(a), 3745-15-07 and 40 CFR Part 63 Subpart KK. The MACT rule of 40 CFR Part 63 Subpart KK is applicable for the specific sections of 40 CFR, Part 63.829(d) and Part 63.830(b)(1).

B. Facility Emissions and Attainment Status

Ampac Plastics Inc. is a large printing company with a PTI limit for VOC emissions of 96 TPY, for all flexographic printing presses at the facility combined. Based on the limit, the facility will remain minor for Title V purposes. Ampac is not subject to the entire MACT standard, but the specific sections noted above. Those sections require an initial notification and HAP recordkeeping. The facility is located in Hamilton County which is designated as attainment for PM/PM₁₀, SO₂, NO_x and CO and is designated non-attainment for 8-hour ozone and PM_{2.5}.

C. Source Emissions

To remain a minor facility, Ampac is accepting the current facility permit limits of 8 tons/month and 96 TPY VOC and a usage limit of 250,000 gallons per year of ink. The facility also is accepting limits of less than 10 TPY for any individual HAP and 25 TPY for any combined HAPs emissions. The facility will maintain monthly usage records to determine compliance with the emission limits.

D. Conclusion

This facility is currently synthetic minor for VOC and HAP emissions. The addition of the new emissions unit would trigger Title V permitting requirements and 40 CFR 63 Subpart KK had the facility not requested that the press be incorporated under the current emissions limitations. The usage limits mentioned above will prevent this facility from becoming a major facility and triggering the Title V and MACT regulations. Monthly record keeping and quarterly reporting requirements will be used to demonstrate compliance.



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL
HAMILTON COUNTY**

CERTIFIED MAIL

Street Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:
Lazarus Gov.
Center

Application No: 14-05855

Fac ID: 1431420497

DATE: 8/15/2006

Ampac Plastics Inc
Kenneth Turner
12025 Tricon Road
Cincinnati, OH 452461792

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$200** will be due. Please do not submit any payment now.

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. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA

HCDES

Ohio-Kentucky-Indiana Regional Council of Governments

KY

IN

HAMILTON COUNTY

PUBLIC NOTICE

**ISSUANCE OF DRAFT PERMIT TO INSTALL 14-05855 FOR AN AIR CONTAMINANT SOURCE FOR
Ampac Plastics Inc**

On 8/15/2006 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Ampac Plastics Inc**, located at **12025 Tricon Road, Cincinnati**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 14-05855:

PTI for one 6 Color Flexographic Printing Press No. 15.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Brad Miller, Hamilton County Department of Environmental Services, 250 William Howart Taft Pkwy,
Cincinnati, OH 45219-2660 [(513)946-7777]



**Permit To Install
Terms and Conditions**

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

DRAFT PERMIT TO INSTALL 14-05855

Application Number: 14-05855
Facility ID: 1431420497
Permit Fee: **To be entered upon final issuance**
Name of Facility: Ampac Plastics Inc
Person to Contact: Kenneth Turner
Address: 12025 Tricon Road
Cincinnati, OH 452461792

Location of proposed air contaminant source(s) [emissions unit(s)]:
**12025 Tricon Road
Cincinnati, Ohio**

Description of proposed emissions unit(s):
PTI for one 6 Color Flexographic Printing Press No. 15.

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

Ampac Plastics Inc
PTI Application: 14-05855
Issued: To be entered upon final issuance
Part I - GENERAL TERMS AND CONDITIONS

Facility ID: 1431420497

A. 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

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping 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 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. Records Retention Requirements

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.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections,

Ampac Plastics Inc
PTI Application: 14-05855

Facility ID: 1431420497

Issued: To be entered upon final issuance

conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. 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 verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. 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 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. 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 emissions unit(s) that is (are) served by such control system(s).

6. 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.

7. 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.

8. 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.

9. 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

Ampac Plastics Inc
PTI Application: 14-05855

Facility ID: 1431420497

Issued: To be entered upon final issuance

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.

10. 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.

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available

Ampac Plastics Inc

Facility ID: 1431420497

PTI Application: 14-05855

Issued: To be entered upon final issuance

Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This 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 ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

14. 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.

15. 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.

B. 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
VOC

Tons Per Year
20.85

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. 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 - (K020) - 6 Color Flexographic Printing Press No. 15

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Volatile Organic Compound (VOC) emissions from the printing press shall not exceed 4.76 lbs/hr and 20.85 TPY VOC The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(Y)(1)(a), OAC rule 3745-31-05(C) and 40 CFR Part 63 Subpart KK.
OAC rule 3745-31-05(C) Synthetic minor to avoid 40 CFR Part 63 Subpart KK and Title V permitting	See terms and conditions A.2.a., A.2.c. and B.1.
40 CFR Part 63 Subpart KK	See term and condition A.2.f.
OAC rule 3745-21-09(Y)(1)(a)	See term and condition A.2.b.

2. Additional Terms and Conditions

- 2.a The total allowable emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K001 (Flexographic Printing Press No. 1), K002 (Flexographic Printing Press No. 2), K004 (Flexographic Printing Press No. 4), K006 (Flexographic Printing Press No. 6), K007 (Flexographic Printing Press No. 7), K010 (Flexographic Printing Press No. 10), K013 Flexographic Printing Press No. 12), K014 (Flexographic Printing Press No. 3), K019 (Flexographic Printing Press No. 14 and K020 (Flexographic Printing Press No. 15) and any deminimis emissions units shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance upon issuance of

Emissions Unit ID: **K020**

the permit.

- 2.b** The VOC content of the coatings and inks employed in emissions unit K020 shall not exceed the following limitations:
- i. Forty (40%) percent VOC by volume of the coating and ink, excluding water and exempt solvents; or
 - ii. Twenty-five (25%) percent VOC by volume of the volatile matter in the coating and ink.
- 2.c** The combined annual VOC emissions from flexographic printing presses #1, #2, #4, #6, #7, #10, #12, #13, #14 and #15 (OEPA emissions units K001, K002, K004, K006, K007, K010, K013, K014, K019 and K020) at Ampac Plastics, Inc. shall not exceed 8 tons per month and 96 tons per year.
- 2.d** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of compliance coatings and usage and emission limitations.
- 2.e** The hourly and annual emission limitations specified in Section A.1. are based upon the emissions unit's Potential to Emit (PTE). Therefore, no records are required to demonstrate compliance with these limits.
- 2.f** The permittee commits to and meets the criteria to be considered an area source for Hazardous Air Pollutants, and is subject only to the record keeping and reporting provisions in 40 CFR 63.829(d) and 40 CFR 63.830(b)(1).

B. Operational Restrictions

1. The maximum combined annual coating usage from flexographic printing presses #1, #2, #4, #6, #7, #10, #12, #13, #14 and #15 (OEPA emissions units K001, K002, K004, K006, K007, K010, K013, K014, K019 and K020) at Ampac Plastics, Inc. shall not exceed 250,000 gallons per year, based upon a rolling, 12-month summation of the coating usage figures.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the emissions units identified in term A.2.a. :
 - a. The name and identification number for each coating and cleanup material

Issued: To be entered upon final issuance

employed.

- b. The individual Hazardous Air Pollutant (HAP) content for each HAP of each coating and cleanup material in pounds of individual HAP per gallon of material, as applied.
- c. The total combined HAP content of each coating and cleanup material in pounds of combined HAPs per gallon of material, as applied [sum all the individual HAP contents from (b)].
- d. The VOC content of the coatings and cleanup materials used in pounds per gallon, as applied.
- e. The percent VOC by volume of each coating and cleanup material (excluding water and exempt solvents), as applied, or the percent VOC by volume of the volatile matter in the coating.
- f. The number of gallons of each coating and cleanup material employed.
- g. The total combined VOC emissions, in pounds or tons per month [the sum of (d) times (f) for each coating and cleanup material].
- h. The total individual HAP usage for each HAP from all coatings and cleanup materials employed, in pounds or tons per month [for each HAP the sum of (b) times (f) for each coating and cleanup material].
- i. The total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per month [the sum of (c) times (f) for each coating and cleanup material].
- j. The updated rolling, 12-month summation of usage for each individual HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
- k. The updated rolling, 12-month summation of usage for total combined HAPs, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. This information does not have to be kept on a line-by-line basis. The HAP recordkeeping is

Emissions Unit ID: **K020**

required by 40 CFR Part 63.830(b)(1).

2. The permittee shall collect and record the following information each month for the emissions units identified in term A.2.c.:
 - a. The coating usage for each month.
 - b. The rolling, 12-month summation of the coating usage figures.

The permittee has existing records to demonstrate compliance upon issuance of the permit.

3. The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Ammonia

TLV (mg/m3): 17,434

Maximum Hourly Emission Rate (lb/hr): 0.476

Predicted 1-Hour Maximum Ground Level Concentration (ug/m3): 351

MAGLC (ug/m3): 415

Physical changes to or in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

Issued: To be entered upon final issuance

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimus level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

Emissions Unit ID: **K020**

1. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP emissions limitations outlined in term and condition A.2.a. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively.)
2. The permittee shall submit quarterly reports to the Hamilton County Department of Environmental Services which specify the total VOC emissions for each month from all flexographic printing presses #1, #2, #4, #6, #7, #10, #12, #13, #14 and #15 (OEPA emissions units K001, K002, K004, K006, K007, K010, K013, K014, K019 and K020) at Ampac Plastics, Inc. These reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters.
3. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncomplying coatings (i.e., the VOC content limitations in term A.2.b.) The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.
4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month coating usage limitation.
5. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emission limitation in Sections A.1 and A.2 of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emissions Limitations:
4.76 lb/hr VOC
20.85 TPY VOC

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be determined by multiplying the maximum hourly coating rate (7 gals/hr) by the worst case VOC content of the ink (0.68 lb/gal). Annual emissions shall be determined by multiplying the maximum hourly emission rate (4.76 lbs VOC/hr) by 8760 hrs/yr and dividing by 2000 lbs/ton.

Issued: To be entered upon final issuance

- b. Emission Limitation:
9.9 TPY for any individual HAP and 24.9 TPY for any combined HAP

Applicable Compliance Method:

Compliance with the HAP emission limitations in Section A.2.a. shall be demonstrated by the recordkeeping requirements specified in Section C.1.

- c. Emission Limitation:
8 tons per month and 96 TPY VOC for emissions units K001, K002, K004, K006, K007, K010, K013, K014, K019 and K020 combined.

Applicable Compliance Method:

Compliance with the monthly and annual emissions limitations in Section A.2.c. shall be demonstrated by the recordkeeping requirements specified in Section C.1.

- 2. Compliance with the VOC content limitations in these terms and conditions shall be determined in accordance with USEPA Method 24A. If, pursuant to Method 24, 40 CFR Part 60, Appendix A, the permittee 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.
- 3. Compliance with the coating usage limitation in term B.1 shall be demonstrated by the recordkeeping requirements specified in term C.2.
- 4. Compliance with the VOC content limitations in terms and conditions A.2.b. shall be based on the record keeping requirements established in term and condition C.1.
- 5. Compliance with the requirements of term and condition A.2.f. shall be demonstrated by the record keeping in term and condition C.1 and reporting in term and condition D.1.

F. Miscellaneous Requirements

- 1. The following terms and conditions of this permit are federally enforceable: A., B., C.1 and C.2., D. and E.