Ohio Environmental Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

8/26/2015

Certified Mail

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

Ms. Teri Raleigh
B-Way Corporation
8200 Broadwell Road
Cincinnati, OH 45244

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1431340460
Permit Number: P0118971
Permit Type: Renewal
County: Hamilton

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

How to appeal this permit

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
77 South High Street, 17th Floor
Columbus, OH 43215

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging 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 Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

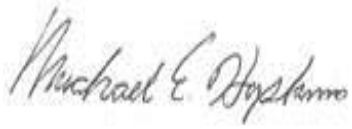
Please complete a survey at www.epa.ohio.gov/survey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Southwest Ohio Air Quality Agency at (513)946-7777or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael E. Hopkins, P.E.
Assistant Chief, Permitting Section, DAPC

Cc: SWOAQA

Ohio Environmental Protection Agency

Response to Comments

Facility ID:	1431340460
Facility Name:	B-Way Corporation
Facility Description:	Metal Can Coating and Manufacturing
Facility Address:	8200 Broadwell Road Cincinnati, OH 45244 Hamilton County
Permit:	P0118971, Permit-To-Install and Operate - Administrative Modification
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the The Cincinnati Enquirer on 07/09/2015. The comment period ended on 08/08/2015.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

1. Topic: Emissions Testing Schedule

a. Comment: Facility requests modified emissions testing requirement dates (schedule).

b. Response: SWOAQA concurs; modified testing schedule incorporated in Draft Terms.

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
B-Way Corporation

Facility ID:	1431340460
Permit Number:	P0118971
Permit Type:	Renewal
Issued:	8/26/2015
Effective:	8/26/2015
Expiration:	8/26/2020

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
B-Way Corporation

Table of Contents

Authorization

Facility ID:	1431340460
Application Number(s):	A0053470
Permit Number:	P0118971
Permit Description:	Administrative permit modification and permit renewal as a non-TV FEPTIO permit to establish synthetic minor limitations on facility-wide VOC emissions to opt out of Title V. No physical or operational modifications to existing emissions units.
Permit Type:	Renewal
Permit Fee:	$0.00
Issue Date:	8/26/2015
Effective Date:	8/26/2015
Expiration Date:	8/26/2020

Permit Evaluation Report (PER) Annual Date: Apr 1 - Mar 31, Due May 15

This document constitutes issuance to:

B-Way Corporation
8200 Broadwell Road
Cincinnati, OH 45244

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Southwest Ohio Air Quality Agency
250 William Howard Taft Rd.
Cincinnati, OH 45219
(513)946-7777

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s))listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director

Authorization (continued)

Permit Number: P0118971
Permit Description: Administrative permit modification and permit renewal as a non-TV FEPTIO permit to establish synthetic minor limitations on facility-wide VOC emissions to opt out of Title V. No physical or operational modifications to existing emissions units.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	**K008**
Company Equipment ID:	P2 - Litho 2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K054**
Company Equipment ID:	Can Line 6
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K058**
Company Equipment ID:	UV 4 (Litho 9)
Superseded Permit Number:	P0106642
General Permit Category and Type:	Not Applicable

Group Name: Conventional Coaters 2,8:

Emissions Unit ID:	**K041**
Company Equipment ID:	Coater 2
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**K046**
Company Equipment ID:	Coater 8
Superseded Permit Number:	
General Permit Category andType:	Not Applicable

Group Name: Conventional Coaters 9, 10:

Emissions Unit ID:	**K050**
Company Equipment ID:	Coater 9
Superseded Permit Number:	14-04545
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**K051**
Company Equipment ID:	Coater 10
Superseded Permit Number:	14-04555
General Permit Category andType:	Not Applicable

Group Name: Side Seam Lines 1 - 5:

Emissions Unit ID:	**K028**
Company Equipment ID:	Can Line 2
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**K029**
Company Equipment ID:	Can Line 3
Superseded Permit Number:	
General Permit Category andType:	Not Applicable

Emissions Unit ID:	**K030**
Company Equipment ID:	Can Line 1
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**K031**
Company Equipment ID:	Can Line 4
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**K033**
Company Equipment ID:	Can Line 5
Superseded Permit Number:	
General Permit Category andType:	Not Applicable

Group Name: UV Litho UV-1, UV-2:

Emissions Unit ID:	**K049**
Company Equipment ID:	UV2 - Litho 6
Superseded Permit Number:	P0106642
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**K052**
Company Equipment ID:	UV3 - Litho 7
Superseded Permit Number:	P0106642
General Permit Category andType:	Not Applicable

A. Standard Terms and Conditions

1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee.This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

  You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee.Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions of this permit will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the [DO/LAA] in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as beingpermanently shut down without first applying for and obtaining a permit pursuantto OAC Chapter 3745-31.

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

   a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

      (1) None.

   b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

      (1) 2., 3., 4., 5. and 6.

2. The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from the entire facility, more specifically, emissions units K008 (Litho PC-2, Conventional Printing Press with Coater), K028 (Can Line 2, Side Seam Stripe Applicator), K029 (Can Line 3, Side Seam Stripe Applicator), K030 (Can Line 1, Side Seam Stripe Applicator), K031 (Can Line 4, Side Seam Stripe Applicator), K033 (Can Line 5, Side Seam Stripe Applicator), K054 (Can Line 6, Side Seam Stripe Applicator), K058 (UV-4 Three Color UV Press and Coating Line), K049 (UV-1, Printing Press with Coater UV-1), K052 (UV-2, Printing Press with Coater), K041 (Conventional Coater 2), K046 (Conventional Coater 8), K050 (Conventional Coater 9 with Incinerator), K051 (Conventional Coater 10 with Incinerator) and all de minimus units (as defined in OAC rule 3745-15-05) and units exempt from the requirement to obtain a permit-to-install pursuant to OAC rule 3745-31-03, combined, shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

3. The total allowable emissions of Volatile Organic Compounds (VOCs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K008, K028, K029, K030, K031, K033, K054, K058 K049, K052, K041, K046, K050, K051,other de minimus air contaminant sources, as defined in OAC rule 3745-15-05, and other air contaminant sources exempt from the requirement to obtain a permit-to-install pursuant to OAC rule 3745-31-03 installed subsequent to the issuance of this permit, combined, shall not exceed 96.0 TPY. Compliance with the VOC limitation shall be based on a rolling, 12-month summation.

4. The permittee shall collect and record the following information each month for the emissions units identified in 2 and 3.

   a) The name and identification number for each coating and cleanup material 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 total VOC content of each coating and cleanup material in pounds per gallon of material, as applied.

   e) The number of gallons of each coating and cleanup material employed.

f) 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 e) for each coating and cleanup material].

g) The total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per month [the sum of c) times e) for each coating and cleanup material].

h) The total combined VOC usage from all coatings and cleanup materials employed, in pounds or tons per month [the sum of d) times e) for each coating and cleanup material].

i) 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.

j) 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.

k) The updated rolling, 12-month summation of usage for VOCs, 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.

5. The permittee shall submit quarterly deviation (excursion) reports that identify:

a) all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

emission limitations specified in Sections B.2. and B.3.

b) the probable cause of each deviation (excursion);

c) any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d) the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

6. Compliance with the emission limitations in B.2.and B.3 of these terms and conditions shall be determined in accordance with the following methods:

a) Emission Limitation:

9.9 TPY for any single HAP and 24.9 TPY for combined HAPs, based on a rolling 12-month summation for the emissions units listed in B.2.

Applicable Compliance Method:

Compliance with the HAP emission limitations shall be demonstrated by the recordkeeping requirements specified in B.4.

b) Emission Limitation:

96.0 TPY for VOCs, based on a rolling 12-month summation for the emissions units listed in B.3.

Applicable Compliance Method:

Compliance with the VOC emission limitations shall be demonstrated by the record keeping requirements specified in B.4.

C. Emissions Unit Terms and Conditions

1. K008, PC-2 - Litho 2

Operations, Property and/or Equipment Description:

Conventional 3-Piece Printing and Overvarnish Coating Line with RTO

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. 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.

b. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-21-09(B)(6)	See b)(2)a.
b.	OAC rule 3745-21-09(D)(2)(b)	See b)(2)b.

(2) Additional Terms and Conditions

a. In lieu of employing compliant coatings in this emissions unit as specified in b)(2)b. below, the VOC capture and control equipment for this emissions unit shall not provide less than an 81% reduction, by weight, in overall VOC emissions from the coating line, and the control equipment (regenerative thermal oxidizer) shall provide an efficiency (percent destruction) of not less than 90%, by weight, for VOC emissions vented to the control equipment.

b. The VOC content of the coatings employed shall not exceed 2.8 pounds of VOC per gallon of coating, as applied, excluding water and exempt solvents.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month whenever the emissions unit is in operation and the regenerative thermal oxidizer is not being employed:

a. the name and identification number of each coating, as applied; and

b. the VOC content of each coating (excluding water and exempt solvents), as applied.

(2) The permittee shall operate and maintain a continuous temperature monitor and recorder to measure and record the combustion temperature within the regenerative thermal oxidizer when the emissions unit is in operation and complying with the specified requirement in b)(2)a. of these terms and conditions. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within $\pm$ 1 percent of the temperature being measured or $\pm$ 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manual(s).

In order to maintain compliance with the applicable emission limitations contained in this permit, the acceptable range for the average combustion temperature within the regenerative thermal oxidizer for any 3-hour block of time when the emissions unit is in operation shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent performance test that demonstrated the emissions unit was in compliance.

(3) The permittee shall operate and maintain equipment to continuouslymonitor and record the duct static pressure at a location upstream (i.e. the vacuum side) of the primary fan in each capture device (enclosure) or upstream of the fan that is common to multiple capture devices (enclosures) during operation of this emissions unit. Units shall be in inches of water gage. The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s).

In order to maintain compliance with the applicable emission limitations contained in this permit, the total enclosure shall be maintained under negative pressure, at a minimum vacuum static pressure that is not less than 0.013 mm Hg (0.007 inches of H_2O gage) as established in Method 204 of Appendix M to 40 CFR Part 51, whenever coating is in progress, except when product quality assurance checks and maintenance operations are performed.

(4) The permittee shall collect and record the following information each day the regenerative thermal oxidizerand capture device(s) are required to demonstrate compliancewith the VOC limitation(s) contained in this permit:

a. all 3-hour blocks of time, when the emissions unit controlled by the regenerative thermal oxidizerwas in operation, during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit

below the average temperature measured during the most recent performance test that demonstrated the emissions unit was in compliance;

b. all 3-hour blocks of time during which the duct static pressure is not maintained at or above the minimum pressure differential of 0.007 inches of water, as a three-hour average; and

c. a log or record of the operating time for the capture (collection) system, regenerative thermal oxidizer, monitoring equipment, and the associated emissions unit.

These records shall be maintained at the facility for a period of three years.

(5) Whenever the monitored average combustion temperature within the regenerative thermal oxidizer deviates from the range specified in d)(2), the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was a deviation;

j. the temperature readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The temperature limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Southwest Ohio Air Quality Agency (SWOAQA). The permittee may request revisions to the permitted temperature limit based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(s). In addition, approved revisions to the temperature limit will not constitute a relaxation of the monitoring requirements of this permit an and may be incorporated into this permit by means of a minor permit modification.

(6) Whenever the monitored average duct static pressure deviates from the value specified in d)(3), the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the capture device (enclosure) within the acceptable value specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was a deviation;

j. the duct static pressure readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

This value is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by SWOAQA. The permittee may request revisions to this value based upon information obtained during future emission tests that demonstrate compliance with the allowable VOC emission rate for this emissions unit.

In addition, approved revisions to this value will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

e) Reporting Requirements

(1) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

(3) The permittee shall notify SWOAQA in writing of any monthly record showing the use of noncomplying coatings when the control equipment was not employed. The notification shall include a copy of such record and shall be sent to SWOAQA within 30 days following the end of the calendar month.

(4) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. all 3-hour blocks of time during which the average combustion temperature within the regenerative thermal oxidizer when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance;

b. any period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to the regenerative thermal oxidizer when required in b)(2)a. of these terms and conditions;

c. all three-hour blocks of time, when the emissions unit was in operation, during which the duct static pressure was not maintained at the minimum pressure differential of 0.007 inches of water;

d. each incident of deviation described in “a”, ”b”, or “c” (above) where a prompt investigation was not conducted;

e. each incident of deviation described in “a”, ”b”, or “c” where prompt corrective action, that would bring the emissions unit into compliance and/or the temperature within the regenerative thermal oxidizer into compliance with the acceptable range, was determined to be necessary and was not taken; and

f. each incident of deviation described in “a”, ”b”, or “c” where proper records were not maintained for the investigation and/or the corrective action(s).

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

2.8 pounds of VOC per gallon of coating for overvarnish, as applied, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance with the VOC content limitations specified above shall be determined by the record keeping requirements specified in d)(1). USEPA Methods 24 and 24A shall be used to determine the VOC contents for coatings. If, pursuant to Method 24 as outlined in 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

(2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. the emission testing shall be conducted within 24 months after issuance of this permit;

b. the emission testing shall be conducted to demonstrate compliance with the overall control efficiency of not less than 81% and a destruction efficiency of not less than 90%, by weight, of all VOC emissions entering the control device;

c. the capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency,"

dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.);

d. the control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases;

e. the permittee shall record the temperature within the combustion chamber of the regenerative thermal oxidizer during each three one-hour compliance runs. At a minimum the temperature shall be recorded at 15 minute intervals. These averages shall be used to determine the indicator range listed in d(2);

f. the test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by SWOAQA;

g. not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to SWOAQA. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in SWOAQA's refusal to accept the results of the emission test(s);

h. personnel from SWOAQA shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment; and

i. a comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to SWOAQA within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from SWOAQA.

g) Miscellaneous Requirements

(1) The total enclosures serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a permanent total enclosure in 40 CFR Part 51, Appendix M, Reference Method 204 when coating is in progress, except when product quality assurance checks and maintenance operations are performed. The permittee shall also maintain an interlock device on the total enclosure above the coating applicator rolls such that the enclosure cannot be compromised when the emissions unit is in operation.

2. K054, Can Line 6

Operations, Property and/or Equipment Description:

Can Line With Side Seam Stripe Applicator 6

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. d)(2), d)(3), d)(4), d)(5), and e)(4).

(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.

b. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 14-04686)	Volatile organic compound (VOC) emissions shall not exceed 1.64 pounds per hour*, excluding cleanup materials. VOC emissions shall not exceed 9.7 tons per year (TPY), including cleanup materials. See b)(2)a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(D)(2)(d). *The hourly emission limitation outlined above is based on the emissions unit's potential to emit (PTE). Therefore, no hourly records are required to demonstrate compliance with this

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		limitation.
b.	OAC rule 3745-21-09(D)(2)(d)	See b)(2)b.

(2) Additional Terms and Conditions

a. The VOC content of the cleanup material employed shall not exceed 7.03 pounds of VOC per gallon of cleanup material.

b. The VOC content of the coatings employed shall not exceed 5.5 pounds of VOC per gallon of coating, as applied, excluding water and exempt solvents.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for this emissions unit:

a. the name and identification number of each coating, as applied;

b. the VOC content of each coating, in pounds of VOC per gallon, excluding water and exempt solvents, as applied;

c. the amount of each coating employed, in gallons, excluding water and exempt solvents;

d. the name and identification number of each cleanup material employed;

e. the VOC content of each cleanup material, in pounds of VOC per gallon;

f. the amount of each cleanup material employed, in gallons;

g. the total monthly emissions, in pounds or tons, of VOC from all coatings and cleanup materials employed; and

h. the year-to-date VOC emission totals, recorded in tons.

(2) The permit-to-install (PTI)application for this emissions unit, K054, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The Toxic Air Contaminant Statute, ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground Level Concentration (MAGLC), calculated as described in the Ohio EPA

guidance document entitled “Review of New Sources of Air Toxic Emissions, Option A”, as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

   i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) “Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices”; or

   ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) “Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices“; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., 24 hours per day and 7 days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

   TLV/10 x 8/X x 5/Y = 4 TLV/XY = MAGLC

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or worst case toxic contaminant(s):

   Toxic Contaminant: n-butyl alcohol

   TLV (ug/m3): 151,000

   Maximum Hourly Emission Rate (lbs/hr): 1.64

   Predicted 1-Hour Maximum Ground Level Concentration (ug/m3): 43

   MAGLC (ug/m3): 3,595

The permittee has demonstrated that emissions of n-butyl alcohol,from emissions unitK054, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the Toxic Air Contaminant Statute, ORC 3704.03(F).

(3) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV 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 toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the “Toxic Air Contaminant Statute“ 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 a non-restrictive change to a parameter or process operation, where compliance with the “Toxic Air Contaminant Statute“, ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a “modification”, the permittee shall apply for and obtain a final PTI prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

(4) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the “Toxic Air Contaminant Statute“, ORC 3704.03(F):

a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

b. the Maximum Acceptable Ground Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the “Toxic Air Contaminant Statute“, ORC 3704.03(F);

c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground level concentration that demonstrated the emissions unit(s) to be in compliance with the “Toxic Air Contaminant Statute“, ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

d. the documentation of the initial evaluation of compliance with the “Toxic Air Contaminant Statute“, ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

(5) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the “Toxic Air Contaminant Statute“, ORC 3704.03(F), through the predicted 1-hour maximum ground level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

e) Reporting Requirements

(1) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

(3) The permittee shall notify SWOAQA in writing of any monthly record showing the use of noncomplying coatings when the control equipment was not employed. The notification shall include a copy of such record and shall be sent to SWOAQA within 30 days following the end of the calendar month.

(4) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the “Toxic Air Contaminant Statute“, ORC 3704.03(F), through the predicted 1-hour maximum groundlevel concentration, in the quarterly deviation (excursion) reports. If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

The VOC content of the coatings employed shall not exceed 5.5 pounds of VOC per gallon of coating, as applied, excluding water and exempt solvents.

The VOC content of the cleanup material employed shall not exceed 7.03 pounds of VOC per gallon of cleanup material.

Applicable Compliance Method:

Compliance with the VOC content limitations specified above shall be determined by the record keeping requirements specified in d)(1). USEPA Methods 24 and 24A shall be used to determine the VOC contents for coatings. If, pursuant to Method 24 as outlined in 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A. USEPA Method 24 or formulation data shall be used to determine the VOC contents of the cleanup materials.

b. Emission Limitation:

VOC emissions shall not exceed 1.64 pounds per hour, excluding cleanup materials.

Applicable Compliance Method:

The hourly emissions limitation specified above is based on the emissions unit's potential to emit and the operational parameters as provided in the PTI application 14-04686, submitted December 29, 1998. This emissions limitation was established by multiplying the emissions unit's maximum hourly coating usage rate (0.299 gallon per hour) by the maximum allowable VOC content (5.5 pounds per gallon).

If required, the permittee shall demonstrate compliance with this emissions limitation through emissions tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25 or 25A.

c. Emission Limitation:

VOC emissions shall not exceed 9.7 TPY, including cleanup materials.

Applicable Compliance Method:

Compliance with the VOC emission limitation specified above shall be determined by the record keeping requirements specified in d)(1)h. The annual emission limitation was determined by multiplying the maximum potential hourly emission rate by 8760 hours per year and adding the maximum emissions from the cleanup material (maximum usage of 720 gallons per year multiplied by the maximum VOC content of 7.03 pounds per gallon) then dividing that total by 2000 pounds per ton.

g) Miscellaneous Requirements

(1) None.

3. K058, UV 4 (Litho 9)

Operations, Property and/or Equipment Description:

3 Color UV Press and One Conventional Ink Press with Coater and Oxidizer UV-4

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. g)(2) and g)(3).

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)c. and b)(1)d.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-21-09(D)(2)(b)	The emission limitations specified by this rule are less stringent than the emission limitation and overall VOC emission reduction requirements established pursuant to OAC rule 3745-31-05(D). Applies as effective 12/01/06, per b)(2)b., b)(2)d.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Volatile organic compound (VOC) emissions shall not exceed 17.0* pounds per hour and 8.84 tons per year. *The lbs/hr emission limitation is based on the emissions unit's potential to emit. Therefore, no hourly recordkeeping is required to demonstrate compliance with this limitation. See b)(2)a.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-31-05(D), as effective 12/01/06 Voluntary Restrictions to Avoid Non-Attainment New Source Review. Voluntary Restrictions to Avoid 40 CFR Part 63, Subpart KKKK.	Volatile organic compound (VOC) emissions shall not exceed 8.84 tons per year (TPY), as a rolling 12-month summation. See b)(2)c. and c)(1).
d.	OAC rule 3745-31-05(D), as effective 12/01/06 Voluntary Restrictions to Avoid BAT	See b)(2)b.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutant less than ten tons per year. However, the rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.

b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

Permit to install/operate P0106642 for this air contaminant source takes into account the following voluntary restrictions as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):

i. Limiting the annual VOC emissions to 8.84 TPY, as a rolling 12-month summation.

ii. Utilizing VOC capture equipment and an integral thermal oxidizer providing not less than 95% reduction, by weight, in the overall VOC emissions from the emissions unit K058, except during cleanup operations. The integral thermal oxidizer shall provide an efficiency (percent destruction) of not less than 95% by weight, for VOC emissions vented to the thermal oxidizer. The integral thermal oxidizer is defined as inherent process equipment whose function is the proper and safe operation of the emissions unit.

c. The permittee shall utilize VOC capture equipment and an integral thermal oxidizer providing not less than 95% reduction, by weight, in the overall VOC emissions from the emissions unit K058, except during cleanup operations. The integral thermal oxidizer shall provide an efficiency (percent destruction) of not less than 95% by weight, for VOC emissions vented to the thermal oxidizer. The integral thermal oxidizer is defined as inherent process equipment whose function is the proper and safe operation of the emissions unit.

d. The permittee shall employ a capture and control system which provides not less than an eighty one percent reduction, by weight, in the overall VOC emissions from this emissions unit and the control equipment shall have an efficiency of not less than ninety per cent, by weight for VOC emissions vented to the control equipment as outlined in OAC rule 3745-21-09(B)(6).

The above capture and control requirements are less stringent than the capture and control requirements outlined in b)(2)c.

c) Operational Restrictions

(1) The maximum annual VOC input, as applied, of materials employed in this emissions unit shall not exceed 120tons per year as a rolling 12-month summation. The VOC input shall be determined by multiplying the number of gallons of coating and cleanup solvent employed per month by the VOC content of each coating and the cleanup solvent in pounds per gallon, excluding water and exempt solvents (see record keeping requirements in terms and conditions d)(1)).

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for this emissions unit:

a. the name and identification number of each coating and cleanup material, as applied.

b. the VOC content of each coating and cleanup material in pounds of VOC per gallon, excluding water and exempt solvents, as applied.

c. the water and exempt solvent content of each coating, as applied, in percent by weight.

d. the amount of each coating employed, in gallons, excluding water and exempt solvents.

e. the coating-specific release factor, as provided in US EPA technical support documents and control technique guidelines for offset lithographic printing, for each coating employed.

f. the amount of each cleanup material employed, in gallons.

g. the weight percent solids and weight percent water of each waste cleanup material collected.

h. the amount of each waste cleanup material collected, in gallons of solvent less solids and water.

i. the monthly VOC input, in tons, determined by multiplying the VOC content of each coating from b. by the gallon usage in d. plus the VOC content of each cleanup material from b. multiplied by the gallon usage from f. This value is then divided by 2000 pounds per ton. .

j. the monthly VOC emissions (the summation of the VOC emission calculations for each coating and cleanup material employed. See f)(1) for calculation methodology).

k. the updated rolling, 12-month summation total, in tons, of VOC input (the total amount of VOC input for the current month recorded in line i. plus the total amount of VOC input for the previous eleven calendar months).

l. the updated rolling, 12-month summation total, in tons, of VOC emissions (the total amount of VOC emissions for the current month recorded in line j. plus the total amount of VOC emissions for the previous eleven calendar months).

(2) The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within $\pm$ 1 percent of the temperature being measured or $\pm$ 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manual(s).

In order to maintain compliance with the applicable emission limitations contained in this permit, the acceptable combustion temperature within the thermal oxidizer, during any period of time when the emissions unitis in operation, shall not be less than 1500 degrees Fahrenheit based upon the manufacturer's specifications until such time as any required emission testing is conducted.

(3) The permittee shall properly operate and maintain equipment to continuouslymonitor and record the duct static pressure at a location upstream (i.e. the vacuum side) of the primary fan in each capture device or upstream of the fan that is common to multiple capture devices during operation of this emissions unit. Units shall be in inches of water gauge. The monitoring equipment shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee. The permittee shall record the duct static pressure on a daily basis.

The duct static pressure shall be maintained under negative pressure, at a minimum duct static pressure that is not less than 0.013 mm Hg (0.007 inches of H2O gage) as established in Method 204 of Appendix M to 40 CFR Part 51, whenever coating is in progress, except when product quality checks and maintenance operations are performed.

(4) The permittee shall collect and record the following information each day the thermal oxidizerand capture device(s) are required to demonstrate compliancewith the VOC limitation(s) contained in this permit:

a. all 3-hour blocks of time, when the emissions unit controlled by the thermal oxidizerwas in operation, during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit was in compliance;

b. all 3-hour blocks of time during which the duct static pressure is not maintained at or above the minimum pressure differential of 0.007 inches of water, as a three-hour average; and

c. a log or record of the operating time for the capture (collection) system, thermal oxidizer, monitoring equipment, and the associated emissions unit.

These records shall be maintained at the facility for a period of three years.

(5) Whenever the monitored average combustion temperature within the thermal oxidizer deviates from the range or limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was a deviation;

j. the temperature readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by SWOAQA. The permittee may request revisions to the permitted temperature range/limit based upon information obtained during future performance tests that demonstrate compliance with the allowable VOC emission rate for this emissions unit. In addition, approved revisions to the temperature range/limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

(6) Whenever the monitored average duct static pressure deviates from the value established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the capture device (enclosure) within the acceptable value specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was a deviation;

j. the duct static pressure readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The duct static pressure value is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by SWOAQA. The permittee may request revisions to this value based upon information obtained during future emission tests that demonstrate compliance with the allowable VOC emission rate for this emissions unit. In addition, approved revisions to this value will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

e) Reporting Requirements

(1) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

(3) The permittee shall submit quarterly deviation (excursion) reports to SWOAQA which identify all exceedances of the following:

a. An identification of all exceedances of the rolling 12-month VOC input operational restriction as specified in c)(1); and

b. An identification of all exceedances of the rolling 12-month emission limitation for VOC as specified in b)(1).

If no deviations occurred during the reporting period, the permittee shall state so in the report.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(4) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. each 3-hour block of time, when the emissions unit was in operation, when the combustion temperature within the thermal oxidizer was below the acceptable limit specified in d)(2) of these terms and conditions;

b. any period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to the thermal oxidizer;

c. each 3-hour blocks of time, when the emissions unit was in operation, during which the duct static pressure was not maintained at the minimum pressure differential of 0.007 inches of water;

d. each incident of deviation described in “a”, ”b”, or “c” (above) where a prompt investigation was not conducted;

e. each incident of deviation described in “a”, ”b”, or “c” where prompt corrective action, that would bring the emissions unit into compliance and/or the temperature within the thermal oxidizer into compliance with the acceptable range, was determined to be necessary and was not taken; and

f. each incident of deviation described in “a”, ”b”, or “c” where proper records were not maintained for the investigation and/or the corrective action(s).

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation:

Volatile organic compound (VOC) emissions shall not exceed 8.84 tons per year (TPY), as a rolling 12-month summation.

Applicable Compliance Method:

The annual VOC emissions limitation established through OAC rule 3745-31-05(D) was developed from the following equations using the information submitted by the permittee in the revised permit to install (PTI) application 14-06015, submitted on March 06, 2008:

[{(61,167 gallons/year of UV Ink, excluding water and exempt solvents) x (0.08 lb of VOC/gal) x (0.05 Release factor) x (1 Ton/2000 lbs)} +

{(1,825 gallons/year of Fountain Solution, excluding water and exempt solvents) x (0.15 lb of VOC/gal) x (1 Ton/2000 lbs)} +

{(16,425 gallons/year of Conventional Heatset Ink, excluding water and exempt

solvents) x (1.40 lbsof VOC/gal) x (0.2 Release factor) x (1 - 95% overall reductionefficiency) x (1 Ton/2000 lbs)} +

{(70,080 gallons/year of Conventional overvarnish, excluding water and exemptsolvents) x (2.8 lbsof VOC/gal) x (1 - 95% overall reduction efficiency) x (1Ton/2000 lbs)} = 5.28TPY.

[{(1,095 gallons/year of UV cleanup material, excluding water and exempt solvents) x (7.54 lbs VOC/gal) x (0.5 Release factor) x (1 Ton/2000 lbs)} +

{(1,095 gallons/year of Conventional cleanup material, excluding water and exempt solvents) x (6.2 lbs VOC/gal) x (1 - 80 % capture efficiency) x (1 Ton/2000 lbs)} +

{(1,095 gallons/year of Conventional cleanup material, excluding water and exempt solvents) x (6.2 lbsof VOC/gal) x {1 - ((80 % capture efficiency)(95 % control efficiency)) x (1 Ton/2000 lbs)} = 3.56 TPY.

Total VOC emissions considering voluntary restrictions = 5.28 + 3.56 = 8.84 TPY.

(2) Compliance with the VOC input limitation in c)(1) shall be demonstrated by the record keeping required in d)(1).

(3) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. the emission testing shall be conducted within 6 months prior to permit expiration;

b. the emission testing shall be conducted to demonstrate compliance with the requirements specified in term and condition b)(2)b. for overall control efficiency of not less than 95% and a destruction efficiency of not less than 95% by weight, of all VOC emissions entering the control device.

c. the permittee shall record the temperature within the combustion chamber of the thermal oxidizer during each three one-hour compliance runs. At a minimum, the temperature shall be recorded at 15 minute intervals. These averages shall be used to determine the acceptable combustion temperature specified in d)(2).

d. the capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency", dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

e. the control efficiency (i.e. the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

f. the test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by SWOAQA.

g. not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to SWOAQA.The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in SWOAQA's refusal to accept the results of the emission test(s).

h. personnel from SWOAQA shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

i. a comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to SWOAQA within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from SWOAQA.

(4) Emission Limitation:

Volatile organic compound (VOC) emissions shall not exceed 17.0 pounds per hour.

Applicable Compliance Method:

The hourly VOC emission limitation was developed by emission factors found in the application of permit number 14-06015 issued on 10/21/08.

g) Miscellaneous Requirements

(1) The enclosures serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a permanent total enclosure in 40 CFR Part 51, Appendix M, Reference Method 204 when coating is in progress, except when product quality assurance checks and maintenance operations are performed. The permittee shall also maintain an interlock device on the enclosure above the coating applicator rolls such that the enclosure cannot be compromised when the emissions unit is in operation.

(2) The permit to install for this emissions unit (K058) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit application. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN 3.0, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

   i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or

   ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

   TLV/10 x 8/X x 5/Y = 4 TLV/XY = MAGLC

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Toxic Contaminant: Xylene

TLV (mg/m3): 434,190

Maximum Hourly Emission Rate (lbs/hr):0.54

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 5.901

MAGLC (ug/m3): 10337.86

The permittee, has demonstrated that emissions of xylene, from emissions unit(s)K058, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F).

Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration”, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV 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 toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the “Toxic Air Contaminant Statute” 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 a non-restrictive change to a parameter or process operation, where compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a “modification” or if a new toxic is emitted, or the modeled toxic(s) is/are expected to exceed the previous modeled level(s), then the permittee shall apply for and obtain a final permit-to-install prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit-to-install application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and may require the permittee to submit a permit-to-install application for the increased emissions.

The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):

a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);

c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

(3) The permittee shall submit annual reports to the appropriate Ohio EPA District Office or local air agency, documenting any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions unit(s), emissions, or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.

4. Emissions Unit Group -Conventional Coaters 2,8:K041,K046

EU ID	Operations, Property and/or Equipment Description
K041	Conventional Coater 2
K046	Conventional Coater 8

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. 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

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-21-09(D)	See b)(2)a.

(2) Additional Terms and Conditions

a. Pursuant to OAC rule 3745-21-09(D)(2) for the surface coating of three-piece cans, the permittee shall comply with one of the following applicable rules and requirements specified in b)(2)a.i., b)(2)a.ii., or b)(2)a.iii. at all times for this emissions unit:

i. The VOC content of the coatings employed shall not exceed the following:

(a) 2.8 pounds of VOC per gallon of coating for basecoats, as applied, excluding water and exempt solvents; and

(b) 4.2 pounds of VOC per gallon of coating for interior body coatings, as applied, excluding water and exempt solvents.

ii. The VOC content of the coatings employed when a control system is in operation shall not exceed the following:

(a) 4.5 pounds of VOC per gallon of solids for basecoats; and

(b) 9.8 pounds of VOC per gallon of solids for interior body coatings.

iii. In lieu of employing compliant coatings as specified above, the VOC capture and control equipment for this emissions unit shall not provide less than an 81% reduction, by weight, in overall VOC emissions from the coating line, and the control equipment (regenerative thermal oxidizer) shall provide an efficiency (percent destruction) of not less than 90%, by weight, for VOC emissions vented to the control equipment.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month whenever the emissions unit is in operation and complying with the specified requirements in b)(2)a.i. of these terms and conditions:

a. the name, identification number, and type (e.g. basecoat, interior body coat, etc.) of each coating, as applied; and

b. the VOC content of each coating (excluding water and exempt solvents), as applied.

(2) The permittee shall collect and record the following information each day whenever the emissions unit is in operation and the regenerative thermal oxidizer is employed to comply with the specified requirements in b)(2)a.ii. of these terms and conditions:

a. the name, identification number, and type (e.g. basecoat, interior body coat, etc.) of each coating, as applied;

b. the pounds of VOC per gallon of coating solids, as applied, the volume solids content, as applied, and the volume, as applied, of each coating;

c. the maximum VOC content (in pounds of VOC per gallon of coating solids, as applied) or the daily volume-weighted average VOC content (in pounds of VOC per gallon of coating solids, as applied) of all the coatings; and

d. the calculated, controlled VOC emission rate, in pounds of VOC per gallon of coating solids, as applied (the controlled VOC emission rate shall be calculated using (i) either the maximum VOC content or the daily volume-weighted VOC content recorded in accordance with d)(2)c. above and (ii) the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.

(3) The permittee shall operate and maintain a continuous temperature monitor and recorder to measure and record the combustion temperature within the regenerative thermal oxidizer when the emissions unit is in operation and complying with the specified requirements b)(2)a.ii. or b)(2)a.iii. of these terms and conditions. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within ± 1 percent of the temperature being measured or ± 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manual(s).

In order to maintain compliance with the applicable emission limitations contained in this permit, the acceptable combustion temperature within the regenerative thermal oxidizer, during any period of time when the emissions unitis in operation and complying with the requirements of b)(2)a.ii. or b)(2)a.iii., shall not be less than 1500 degrees Fahrenheit.

(4) The permittee shall operate and maintain equipment to continuouslymonitor and record the duct static pressure at a location upstream (i.e. the vacuum side) of the primary fan in each capture device (enclosure) or upstream of the fan that is common to multiple capture devices (enclosures) during operation of this emissions unit. Units shall be in inches of water gage. The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s).

In order to maintain compliance with the applicable emission limitations contained in this permit, the total enclosure shall be maintained under negative pressure, at a minimum vacuum static pressure that is not less than 0.013 mm Hg (0.007 inches of H_2O gage) as established in Method 204 of Appendix M to 40 CFR Part 51, whenever coating is in progress, except when product quality assurance checks and maintenance operations are performed.

(5) The permittee shall collect and record the following information each day the regenerative thermal oxidizerand capture device(s) are required to demonstrate compliancewith the VOC limitation(s) contained in this permit:

a. all 3-hour blocks of time, when the emissions unit controlled by the regenerative thermal oxidizerwas in operation, during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit was in compliance;

b. all 3-hour blocks of time during which the duct static pressure is not maintained at or above the minimum pressure differential of 0.007 inches of water, as a three-hour average; and

c. a log or record of the operating time for the capture (collection) system, regenerative thermal oxidizer, monitoring equipment, and the associated emissions unit.

These records shall be maintained at the facility for a period of three years.

(6) Whenever the monitored average combustion temperature within the regenerative thermal oxidizer deviates from the limit specified in d)(3), the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

a. a description of the corrective action;

b. the date corrective action was completed;

c. the date and time the deviation ended;

d, the total period of time (in minutes) during which there was a deviation;

e. the temperature readings immediately after the corrective action was implemented; and

f. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The temperature limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by SWOAQA. The permittee may request revisions to the permitted temperature limit based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(s). In addition, approved revisions to the temperature limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

(7) Whenever the monitored average duct static pressure deviates from the value specified in d)(4), the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the capture device (enclosure) within the acceptable value specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was a deviation;

j. the duct static pressure readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The minimum pressure limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by SWOAQA. The permittee may request revisions to this value based upon information obtained during future emission tests that demonstrate compliance with the allowable VOC emission rate for this emissions unit. In addition, approved revisions to this value will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of minor permit modification.

(8) The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

e) Reporting Requirements

(1) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

(3) The permittee shall notify SWOAQA in writing of any monthly record showing the use of noncomplying coatings when the emissions unit was operating according to the specified requirements in b)(2)a.i. The notification shall include a copy of such record and shall be sent to SWOAQA within 30 days following the end of the calendar month.

(4) The permittee shall notify SWOAQA in writing of any daily record showing that the calculated, controlled VOC emission rate exceeds the applicable pounds of VOC per gallon of solids limitation when the emissions unit was operating according to the specified requirements in b)(2)a.ii. The notification shall include a copy of such record and shall be sent to SWOAQA within 45 days following the end of the calendar month.

(5) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. each 3-hour block of time, when the emissions unit was in operation, when the combustion temperature within the regenerative thermal oxidizer was below the acceptable limit specified in d)(6) of these terms and conditions;

b. any period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to the regenerative thermal oxidizer when required in b)(2)a.ii. or b)(2)a.iii. of these terms and conditions;

c. each 3-hour blocks of time, when the emissions unit was in operation, during which the duct static pressure was not maintained at the minimum pressure differential of 0.007 inches of water;

d. each incident of deviation described in “a”, ”b”, or “c” (above) where a prompt investigation was not conducted;

e. each incident of deviation described in “a”, ”b”, or “c” where prompt corrective action, that would bring the emissions unit into compliance and/or the temperature within the regenerative thermal oxidizer into compliance with the acceptable range, was determined to be necessary and was not taken; and

f. each incident of deviation described in “a”, ”b”, or “c” where proper records were not maintained for the investigation and/or the corrective action(s).

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations:

2.8 pounds of VOC per gallon of coating for basecoats, as applied, excluding water and exempt solvents; and

4.2 pounds of VOC per gallon of coating for interior body coatings, as applied, excluding water and exempt solvents

Applicable Compliance Method:

Compliance with the VOC content limitations specified above shall be determined by the record keeping requirements specified in d)(1). USEPA Methods 24 and 24A shall be used to determine the VOC contents for coatings. If, pursuant to Method 24 as outlined in 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

b. Emission Limitations:

4.5 pounds of VOC per gallon of solids for basecoats; and

9.8 pounds of VOC per gallon of solids for interior body coatings.

Applicable Compliance Method:

USEPA Methods 24 and 24A shall be used to determine the VOC contents, solids contents, or density for coatings. If, pursuant to Method 24 as outlined in 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or

24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

In order to demonstrate compliance with the pounds of VOC per gallon of solids limitation, the controlled VOC mass emissions rate shall be calculated using the VOC and solids content of coatings as determined above and the results of capture and control efficiency testing as required in f)(2) below. The method of calculation is specified in d)(2) of these terms and conditions.

(2) The permittee shall conduct, or have conducted, emission testing in accordance with the following requirements:

a. the emission testing shall be conducted within 24 months after issuance of this permit;

b. the emission testing shall be conducted to demonstrate compliance with the pounds of VOC per gallon of solids limitation requirements specified in b)(2)a.ii. and/or the requirements specified in b)(2)a.iii. for overall control efficiency of not less than 81% and a destruction efficiency of not less than 90%, by weight, of all VOC emissions entering the control device;

c. the permittee shall record the temperature within the combustion chamber of the regenerative thermal oxidizer during each three one-hour compliance runs. At a minimum, the temperature shall be recorded at 15 minute intervals. These averages shall be used to determine the acceptable combustion temperature specified in d(6);

d. the capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.);

e. the control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases;

f. the test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by SWOAQA;

g. no later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to SWOAQA. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in SWOAQA's refusal to accept the results of the emission test(s)

h. personnel from SWOAQA shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment; and

i. a comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to SWOAQA within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from SWOAQA.

g) Miscellaneous Requirements

(1) The total enclosures serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a permanent total enclosure in 40 CFR Part 51, Appendix M, Reference Method 204 when coating is in progress, except when product quality assurance checks and maintenance operations are performed. The permittee shall also maintain an interlock device on the total enclosure above the coating applicator rolls such that the enclosure cannot be compromised when the emissions unit is in operation.

5. Emissions Unit Group -Conventional Coaters 9, 10:K050,K051

EU ID	Operations, Property and/or Equipment Description
K050	Metal sheet roll coater with permanent total enclosures, drying oven and thermal incinerator - Modification
K051	Metal sheet roll coater with drying oven and thermal incinerator - Modification

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. d)(7) – d)(10) and e)(5).

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)b.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 14-04545, K050) (PTI 14-04555, K051)	Volatile organic compound (VOC) emissions shall not exceed 76.9 pounds per day*, including cleanup materials. See b)(2)a., b)(2)b., b)(2)c., and c)(3). The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D). *The daily emission limitation outlined above is based upon the emissions unit's potential to emit (PTE). Therefore, no daily records are required to demonstrate compliance with this limitation.
b.	OAC rule 3745-31-05(D) Synthetic Minor for VOC to Avoid	VOC emissions shall not exceed 13.6 tons per year (TPY), including cleanup materials, based upon a rolling, 12-month

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	Major Modification	summation. See c)(1) and c)(2).
c.	OAC rule 3745-21-09(D)	The emission limitations specified in this rule are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

a. This emissions unit shall be equipped with permanent total enclosures followed by a thermal incinerator with 95% destruction efficiency thus giving an overall control efficiency of 95%.

b. The VOC content of the coatings employed shall not exceed 6.3 pounds of VOC per gallon of coating, as applied, excluding water and exempt solvents.

c. The VOC content of the cleanup materials employed shall not exceed 9.1 pounds of VOC per gallon of cleanup material, as applied.

c) Operational Restrictions

(1) The maximum annual coating usage rate for this emissions unit shall not exceed 77,800 gallons of coating per year, excluding water and exempt solvents, based upon a rolling, 12-month summation of the coating usage figures.

(2) The maximum annual cleanup material usage rate for this emissions unit shall not exceed 6,100 gallons per year*, based upon a rolling, 12-month summation of the cleanup material usage figures.

*The permittee may subtract out the cleanup material which is collected for sale, reuse, or disposal if the records are maintained as outlined in d)(1).

(3) The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information on a monthly basis:

a. The name and identification number of each coating, as applied;

b. The VOC content of each coating in pounds per gallon, excluding water and exempt solvents, as applied;

c. The amount of each coating, in gallons, excluding water and exempt solvents, employed;

d. The name and identification of each cleanup material employed;

e. The number of gallons of each cleanup material employed. This shall not include the cleanup material which is collected for sale, reuse, or disposal;

f. The VOC content of each cleanup material, in pounds per gallon, as applied;

g. The calculated, controlled VOC emission rate for all coatings and cleanup materials, in pounds or tons. The controlled VOC emission rate shall be calculated using the overall control efficiency as determined during the most recent emission test that demonstrated that the emissions unit was in compliance;

h. The total VOC emissions, in tons; and

i. The rolling, 12-month summation of the VOC emissions, in tons, for this emissions unit.

(2) The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within $\pm$ 1 percent of the temperature being measured or $\pm$ 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manual(s).

In order to maintain compliance with the applicable emission limitations contained in this permit, the acceptable combustion temperature within the thermal oxidizer, during any period of time when the emissions unitis in operation, shall not be less than 1400 degrees Fahrenheit.

(3) The permittee shall operate, and maintain equipment to continuously monitor the pressure differential in the permanent total enclosure above the coating applicator rolls and the pressure differential in the drying oven, as representative of the oven entrance enclosure, during operation of this emissions unit. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the difference in pressure at each monitoring location on daily basis.

As specified in the Method 204 requirements, the permanent total enclosures and drying oven shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.013 mm Hg (0.007 inches of H_2O), whenever the emissions unit is in operation except when product quality assurance checks and maintenance operations are performed.

(4) The permittee shall collect and record the following information each day the thermal oxidizerand capture device(s) are required to demonstrate compliancewith the VOC limitation(s) contained in this permit:

a. all 3-hour blocks of time, when the emissions unit controlled by the thermal oxidizerwas in operation, during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit was in compliance;

b. all 3-hour blocks of time during which the duct static pressure is not maintained at or above the minimum pressure differential of 0.007 inches of water, as a three-hour average; and

c. a log or record of the operating time for the capture (collection) system, thermal oxidizer, monitoring equipment, and the associated emissions unit.

These records shall be maintained at the facility for a period of three years.

(5) Whenever the monitored average combustion temperature within the thermal oxidizer deviates from the range or limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was a deviation;

j. the temperature readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by SWOAQA. The permittee may request revisions to the permitted temperature range/limit based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(s). In addition, approved revisions to the temperature range/limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

(6) Whenever the monitored value for the pressure differential deviates from the value specified in d)(3), the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the capture device (enclosure) within the acceptable value specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was a deviation;

j. the pressure differential readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The value specified in d)(3) is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by SWOAQA. The permittee may request revisions to this value based upon information obtained during future emission tests that demonstrate compliance with the allowable VOC emission rate for this emissions unit. In addition, approved revisions to this value will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of minor permit modification.

(7) The permit-to-install (PTI)applications for these emissions units, K050 and K051,were evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

   i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or

   ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., 24 hours per day and 7 days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4\ TLV/XY = MAGLC$$

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or worst case toxic contaminant(s):

Toxic Contaminant: glycol ethers

TLV (ug/m3): 18,000

Maximum Hourly Emission Rate (lbs/hr): 1.04

Predicted 1-Hour Maximum Ground Level Concentration (ug/m3): 10.81

MAGLC (ug/m3): 428.6

The permittee has demonstrated that emissions of glycol ethers,from emissions unitsK050 and K051,are calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the “Toxic Air Contaminant Statute“, ORC 3704.03(F).

(8) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground level concentration”, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV 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 toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the “Toxic Air Contaminant Statute“ 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 a non-restrictive change to a parameter or process operation, where compliance with the “Toxic Air Contaminant Statute“, ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a “modification”, the permittee shall apply for and obtain a final PTI prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

(9) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):

a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

b. the Maximum Acceptable Ground Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);

c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

(10) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

e) Reporting Requirements

(1) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this

permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

The permittee shall notify SWOAQA in writing of any monthly record showing exceedances of the coating and/or cleanup material VOC content limitations. The notification shall include a copy of such record and shall be sent to SWOAQA within 30 days following the end of the calendar month.

(3) The permittee shall submit deviation (excursion) reports which identify the following:

a. any exceedance of the rolling, 12-month coating usage limitation;

b. any exceedance of the rolling, 12-month cleanup material usage limitation; and

c. any exceedance of the rolling, 12-month VOC emissions limitation.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(4) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. each 3-hour block of time, when the emissions unit was in operation, when the combustion temperature within the thermal oxidizer was below the acceptable limit specified in d)(2) of these terms and conditions;

b. any period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to the thermal oxidizer;

c. each 3-hour blocks of time, when the emissions unit was in operation, during which the pressure differential was not maintained at the minimum pressure differential of 0.007 inches of water;

d. each incident of deviation described in “a”, ”b”, or “c” (above) where a prompt investigation was not conducted;

e. each incident of deviation described in “a”, ”b”, or “c” where prompt corrective action, that would bring the emissions unit into compliance and/or the temperature within the thermal oxidizer into compliance with the acceptable range, was determined to be necessary and was not taken; and

f. each incident of deviation described in “a”, ”b”, or “c” where proper records were not maintained for the investigation and/or the corrective action(s).

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(5) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the “Toxic Air Contaminant Statute“, ORC 3704.03(F), through the predicted 1-hour maximum

groundlevel concentration, in the quarterly deviation (excursion) reports. If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.

(6) The permittee shall submit annual reports which specify the total VOC emissions, in tons, for this emissions unit. These reports shall be submitted to SWOAQA by January 31 of each year and shall cover the previous calendar year.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations:

The VOC content of the coatings employed shall not exceed 6.3 pounds of VOC per gallon of coating, as applied, excluding water and exempt solvents.

The VOC content of the cleanup materials employed shall not exceed 9.1 pounds of VOC per gallon of cleanup material, as applied.

Applicable Compliance Method:

Compliance with the VOC content limitations specified above shall be determined by the record keeping requirements specified in d)(1). USEPA Methods 24 and 24A shall be used to determine the VOC contents for coatings. If, pursuant to Method 24 as outlined in 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A. USEPA Method 24 or formulation data shall be used to determine the VOC contents of the cleanup materials.

b. Emission Limitation:

VOC emissions shall not exceed 76.9 pounds per day, including cleanup materials.

Applicable Compliance Method:

The daily emission limitation specified above is based on the emissions unit's potential to emit and the operational parameters as provided in the PTI application 14-04545, submitted March 5, 1998 for emissions unit K050, and the PTI application 14-04555, submitted April 2, 1998 for emissions unit K051. This emission limitation was established by multiplying the emissions unit's maximum hourly coating usage rate (9.17 gallons per hour) by the maximum allowable VOC content (6.3 pounds per gallon) then by 24 hours per day, and adding that product to the total daily cleanup material emissions (maximum usage of 16.7 gallons per day multiplied by the maximum allowable VOC content of 9.1 pounds

per gallon), and multiplying the resulting value by the required overall control efficiency (0.05). Compliance with this emission limitation shall be demonstrated based upon the records required pursuant to d)(1) and the emission testing requirements specified in f)(2) of this permit.

c. Emission Limitation:

VOC emissions shall not exceed 13.6 tons per year (TPY), including cleanup materials, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the VOC emissions limitation specified above shall be determined by the record keeping requirements specified in d)(1) of these terms and conditions.

(2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. the emission testing shall be conducted within 12 months after issuance of the permit.

b. the emission testing shall be conducted to demonstrate compliance with the requirements specified in b)(2)a. for overall control efficiency of not less than 95% (100% capture by the PTE) and a destruction efficiency of not less than 95%, by weight, of all VOC emissions entering the control device.

c. the permittee shall record the temperature within the combustion chamber of the thermal oxidizer during each three one-hour compliance runs. At a minimum, the temperature shall be recorded at 15 minute intervals. These averages shall be used to determine the acceptable combustion temperature specified in d(2);

d. the capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

e. the control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

f. the test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by SWOAQA.

g. not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to SWOAQA. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in SWOAQ's refusal to accept the results of the emission test(s).

h. personnel from SWOAQA shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

i. a comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to SWOAQA within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from SWOAQA.

g) Miscellaneous Requirements

(1) The permanent total enclosures serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a permanent total enclosure in 40 CFR Part 51, Appendix M, Reference Method 204 when coating is in progress, except when product quality assurance checks and maintenance operations are performed. The permittee shall also maintain an interlock device on the permanent total enclosure above the coating applicator rolls such that the enclosure cannot be compromised when the emissions unit is in operation.

6. Emissions Unit Group -Side Seam Lines 1 - 5:K028,K029,K030,K031,K033

EU ID	Operations, Property and/or Equipment Description
K028	Can Line With Side Seam Stripe Applicator 2
K029	Can Line With Side Seam Stripe Applicator 3
K030	Can Line With Side Seam Stripe Applicator 1
K031	Can Line With Side Seam Stripe Applicator 4
K033	Can Line With Side Seam Stripe Applicator 5

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. 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.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-21-09(D)(2)d)	See b)(2)a.

(2) Additional Terms and Conditions

a. The VOC content of the coatings employed shall not exceed 5.5 pounds of VOC per gallon of coating, as applied, excluding water and exempt solvents.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month whenever the emissions unit is in operation:

a. the name and identification number of each coating, as applied; and

b. the VOC content of each coating (excluding water and exempt solvents), as applied.

e) Reporting Requirements

(1) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

(3) The permittee shall notify SWOAQA in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to SWOAQA within 30 days following the end of the calendar month.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

5.5 pounds of VOC per gallon of coating for side seam coatings, as applied, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance with the VOC content limitations specified above shall be determined by the record keeping requirements specified in d)(1). USEPA Methods 24 and 24A shall be used to determine the VOC contents for coatings. If, pursuant to Method 24 as outlined in 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating, the

permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

g) Miscellaneous Requirements

(1) None.

7. Emissions Unit Group -UV Litho UV-1, UV-2:K049,K052

EU ID	Operations, Property and/or Equipment Description
K049	UV Lithographic Printer with Coater UV-1
K052	UV Lithographic Printer with Coater UV-2

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. g)(1).

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)c.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-21-09(D)(2)(b)	See b)(2)a.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Volatile organic compound (VOC) emissions shall not exceed 11.7* pounds per hour and 4 tons per year. The lbs/hr emission limitation is based on the emissions unit's potential to emit. Therefore no hourly recordkeeping is needed to demonstrate compliance with this limitation. See b)(2)b.
c.	OAC rule 3745-31-05(D), as effective 12/01/06. Voluntary Restrictions to Avoid BAT and avoiding Non-Attainment New Source Review.	Volatile organic compound (VOC) emissions shall not exceed 4.0 tons per year (TPY), as a rolling 12-month summation. See b)(2)c. and c)(1).

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	Voluntary Restrictions to Avoid 40 CFR Part 63, Subpart KKKK.	

(2) Additional Terms and Conditions

a. The permittee shall not employ coatings in emissions units K049 and K052 with a VOC content greater than 2.8 pounds per gallon of coating, as applied, excluding water and exempt solvents.

b. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutant less than ten tons per year. However, the rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.

c. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

Permit to install/operate P0106642 for this air contaminant source takes into account the following voluntary restrictions as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):

i. Limiting the annual VOC emissions to 4.0 TPY, as a rolling 12-month summation.

c) Operational Restrictions

(1) The maximum annual VOC input, as applied, of materials employed in this emissions unit shall not exceed 7.8 tons per year as a rolling 12-month summation. The VOC input shall be determined by multiplying the number of gallons of coating and cleanup solvent employed per month by the VOC content of each coating and the cleanup solvent in pounds per gallon, excluding water and exempt solvents (see record keeping requirements in terms and conditions d)(1)). Since this is an existing emissions unit, the company has existing records to demonstrate compliance with this limitation.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for this emissions unit:

a. The name and identification number of each coating and cleanup material, as applied.

b. The VOC content of each coating and cleanup material in pounds of VOC per gallon, excluding water and exempt solvents, as applied.

c. The water and exempt solvent content of each coating, as applied, in percent by weight.

d. The amount of each coating employed, in gallons, excluding water and exempt solvents.

e. The coating-specific release factor, as provided in US EPA technical support documents and control technique guidelines for offset lithographic printing, for each coating employed.

f. The amount of each cleanup material employed, in gallons.

g. The weight percent solids and weight percent water of each waste cleanup material collected.

h. The amount of each waste cleanup material collected, in gallons of solvent less solids and water.

i. The monthly VOC input, in tons, determined by multiplying the VOC content of each coating from b. by the gallon usage in d. plus the VOC content of each cleanup material from b. multiplied by the gallon usage from f. This value is then divided by 2000 pounds per ton.

j. The monthly VOC emissions (the summation of the VOC emission calculations for each coating and cleanup material employed. See f)(1)b. for calculation methodology).

k. The updated rolling, 12-month summation total, in tons, of VOC input (the total amount of VOC input for the current month recorded in line i. plus the total amount of VOC input for the previous eleven calendar months).

l. The updated rolling, 12-month summation total, in tons, of VOC emissions (the total amount of VOC emissions for the current month recorded in line j. plus the total amount of VOC emissions for the previous eleven calendar months).

e) Reporting Requirements

(1) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA

fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

(3) The permittee shall notify SWOAQA in writing of any monthly record showing a coating VOC content greater than 2.8 pounds VOC per gallon, as applied, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to SWOAQA within 30 days following the end of the calendar month in which the use of non-complying coatings was recorded.

(4) The permittee shall submit quarterly deviation (excursion) reports to SWOAQA which identify all exceedances of the following:

a. an identification of all exceedances of the rolling 12-month VOC input operational restriction as specified in c)(1); and

b. an identification of all exceedances of the rolling 12-month emission limitation for VOC as specified in b)(1).

If no deviations occurred during the reporting period, the permittee shall state so in the report.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

The VOC content of the coatings employed shall not exceed 2.8 pounds per gallon, as applied, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance with the VOC content limitations specified above shall be determined by the record keeping requirements specified in d)(1). USEPA Methods 24 and 24A shall be used to determine the VOC content for coatings. If, pursuant 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or

24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A. USEPA Method 24 or formulation data shall be used to determine the VOC contents of the cleanup materials.

b. Emission Limitation:

Volatile organic compound (VOC) emissions shall not exceed 4.0 tons per year (TPY), as a rolling 12-month summation.

Applicable Compliance Method:

The annual VOC emissions limitation established through OAC rule 3745-31-05(D) was developed from the following equations using the information submitted by the permittee in the revised permit to install (PTI) application 14-06015, submitted on March 06, 2008:

[{(45,875 gallons/year of UV Ink, excluding water and exempt solvents) x (0.08 lb of VOC/gal) x (0.05 Release factor) x (1 Ton/2000 lbs)} +

{(1,825 gallons/year of Fountain Solution, excluding water and exempt solvents) x (0.15 lb of VOC/gal) x (1 Ton/2000 lbs)} +

{(33,288 gallons/year of UV Overvarnish, excluding water and exempt solvents) x (0.10 lb of VOC/gal) x (1 Ton/2000 lbs)}]

= 1.9 TPY VOC

[(1,095 gallons/year of cleanup material*, excluding water and exempt solvents) x (7.54 lbs of VOC/gal) x (0.5 Release factor) x (1 Ton/2000 lbs)]

= 2.1 TPY VOC

Total VOC emissions considering voluntary restrictions = 1.9 + 2.1 = 4.0 TPY

* The permittee may subtract out the cleanup material which is collected for sale, reuse, or disposal if the records are maintained as outlined in d)(1).

c. Emission Limitation:

Volatile organic compound (VOC) emissions shall not exceed 11.7 pounds per hour.

Applicable Compliance Method:

The hourly VOC emission limitation was developed by emission factors found in the application of permit number 14-06015 issued on 10/21/08.

(2) Compliance with the VOC input limitation in c)(1) shall be demonstrated by the record keeping required in d)(1).

g) 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.