

Facility ID: 1318003469 Issuance type: Draft State Permit To Operate

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

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

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

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Facility ID: 1318003469 Emissions Unit ID: K005 Issuance type: Draft State Permit To Operate

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Part II - Special Terms and Conditions

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Ward Die Cutter	OAC rule 3745-21-09 (Y)(2)(b) OAC rule 3745-31-05 PTI No. 13-3017	See Section B.1. The permittee shall use only coatings, inks and cleaning agents which contain a maximum of 0.5 pounds VOC per gallon. The permittee shall not cause, allow or permit the discharge into the ambient air in excess of 2.0 pounds VOC per hour, including cleanup materials.
	40 CFR part 63 subpart KK	See Section A.2.

2. Additional Terms and Conditions

- (a) The permittee chooses to commit to, and meet the following criteria for purposes of establishing the facility to be an area source with respect to 40 CFR part 63 subpart KK:
 - i. Emit less than 10 tons per each rolling 12-month period of each hazardous air pollutant (HAP) at the facility, including materials used for source categories or purposes other than printing and publishing, and
 - ii. Emit less than 25 tons per each rolling 12-month period of any combination of HAP at the facility, including material used for source categories or purposes other than printing and publishing.
Term A.2.a shall exclude material used in routine janitorial or facility grounds maintenance, personal uses by employees or other persons, the use of products for the purpose of maintaining electric, propane, gasoline and diesel powered motor vehicles operated by the facility, and the use of HAP contained in intake water (used for processing or noncontact cooling) or intake air (used either as compressed air or for combustion).

B. Operational Restrictions

1. The total maximum coatings and inks usage in all flexographic packaging rotogravure and publication rotogravure printing lines at this facility shall be less than or equal to one hundred forty-eight tons per calendar year.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the name and identification number of each coating, ink, and cleanup material, as applied;
 - b. the VOC content of each coating, ink, and cleanup material, in pounds per gallon;
 - c. the number of gallons of each coating, ink, and cleanup material employed;
 - d. the total VOC emissions from all coatings, ink, and cleanup material employed, in pounds;
 - e. the total number of hours the emissions unit was in operation; and
 - f. the average hourly VOC emission rate for all coatings, inks, and cleanup materials, in pounds per hour (average).

2. The permittee shall collect and record the following information each month for emissions units K003, K005, and K006 combined:
 - a. the name and identification of each coating, ink, and cleanup material employed;
 - b. the individual and combined HAP content of each coating, ink, and cleanup material, in pounds per gallon;
 - c. the number of gallons of each ink, adhesive, and cleanup material employed;
 - d. the individual and combined HAP emissions from each coating, ink, and cleanup material employed, in pounds;
 - e. the total individual and combined HAP emissions from all coatings, inks, and cleanup materials employed, in pounds; and
 - f. the rolling 12-month total of individual and combined HAP emissions from all coatings, inks, and cleanup materials employed, in pounds and tons.
 3. The permittee shall collect and record the following facility-wide information each calendar year for the purpose of determining coatings and inks usage:
 - a. the name and identification of each coating and ink employed;
 - b. the density of each coating and ink, in pounds per gallon;
 - c. the number of gallons of each coating and ink employed; and
 - d. the total coating and ink usage, in pounds and tons.
- D. Reporting Requirements**
1. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. an identification of each day during which the VOC content of any coating, ink, or cleanup material exceeded 0.5 pound per gallon, and the actual VOC content for each such coating, ink, or cleanup material;
 - b. an identification of each day during which the VOC emissions from this emissions unit exceeded 2.0 pounds per hour, and the actual VOC emissions for each such day;
 - c. an identification of each rolling 12-month period during which any single HAP emission at the facility exceeded 10 tons, and the actual single HAP emissions for each such rolling 12-month period; and
 - d. an identification of each rolling 12-month period during which the combined HAP emissions at the facility exceeded 25 tons, and the actual combined HAP emissions for each such rolling 12-month period.
 2. The permittee shall submit annual reports which summarize the coatings and inks usage for the entire facility for the previous calendar year. These reports shall be submitted by January 31 of each year.
 3. The permittee shall submit an initial notification report for this emissions unit no later than May 30, 1998 to the Director (the Ohio EPA District Office or local air agency). The notification shall provide the following information:
 - a. the name and address of the owner or operator;
 - b. the address (i.e., physical location) of the affected source;
 - c. an identification of the relevant standard, or other requirement, that is the basis of the notification and the source's compliance date;
 - d. a brief description of the nature size, design, and method of operation of the emissions unit, including its operating design capacity and an identification of each point of emission for each HAP, or if a definitive identification is not yet possible, a preliminary identification of each point of emission for each HAP; and
 - e. a statement of whether the affected source is a major source or an area source.
- E. Testing Requirements**
1. Compliance with the emission limitations in section A.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation: 2.0 lb/hour of VOC

Applicable Compliance Method: Compliance shall be determined based upon record keeping specified in section C.1.
 - b. Emission Limitation: 0.5 lb VOC /gallons of ink

Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section C.1.

U.S. EPA Methods 24 and 24A shall be used to determine the VOC contents for flexographic printing inks. If, pursuant to section 4.3 of Method 24, 40 CFR part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular ink, the owner or operator shall so notify the Administrator of the U.S. EPA and shall use formulation data for that ink to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.
 2. Compliance with the emission limitations in section A.2 of these terms and conditions shall be determined in

accordance with the following methods:

- a. Emission Limitation: < 10 tons per each rolling 12-month period of each HAP at the facility

Applicable Compliance Method: Compliance with the above limit shall be determined based upon the record keeping requirements specified in section C.

- b. Emission Limitation: < 25 tons per each rolling 12-month period of any combination of HAP at the facility

Applicable Compliance Method: Compliance with the above limit shall be determined based upon pursuant to the record keeping requirements specified in section C.

- 3. Formulation data shall be used to determine the HAP contents of the inks and cleanup materials.

F. Miscellaneous Requirements

- 1. None

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Part II - Special Terms and Conditions

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

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

- (a) None.

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

- (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Ward Die Cutter 66" x 113" two color flexographic printer	OAC rule 3745-21-09 (Y)(2)(b)	See Section B.1.
	OAC rule 3745-31-05 PTI No. 13-3205	The permittee shall only use water based inks and adhesives and soap based cleaning agents. The permittee shall not cause, allow or permit the discharge into the ambient air in excess of 2.0 pounds VOC per hour and 8.76 tons per year (including cleanup material).
	40 CFR part 63 subpart KK	See Section A.2.a to A.2.e.

2. Additional Terms and Conditions

- (a) The permittee chooses to commit to, and meet the following criteria for purposes of establishing the facility to be an area source with respect to 40 CFR part 63 subpart KK:

- i. Use less than 10 tons per each rolling 12-month period of each hazardous air pollutant (HAP) at the facility, including materials used for source categories or purposes other than printing and publishing, and

- ii. Use less than 25 tons per each rolling 12-month period of any combination of HAP at the facility, including material used for source categories or purposes other than printing and publishing. The permittee commits to the condition in section A.2.a of these terms and conditions may exclude material used in routine janitorial or facility grounds maintenance, personal uses by employees or other persons, the use of products for the purpose of maintaining electric, propane, gasoline and diesel powered motor vehicles operated by the facility, and the use of HAP contained in intake water (used for processing or noncontact cooling) or intake air (used either as compressed air or for combustion). The permittee shall comply with any applicable local, state and federal requirements governing the storage, treatment, handling, transport and disposal of any waste materials generated by the operation of this emissions unit.

B. Operational Restrictions

- 1. The total maximum ink usage in all flexographic packaging rotogravure and publication rotogravure printing lines

at this facility shall be less than or equal to one hundred forty-eight tons per year.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the name and identification number of each ink, adhesive, and cleanup material, as applied;
 - b. the VOC content of each ink and adhesive (excluding water and exempt solvents), in pounds per gallon;
 - c. the VOC content of each cleanup material, in pounds per gallon;
 - d. the number of gallons of each ink employed;
 - e. the number of gallons (excluding water and exempt solvents) of each adhesive employed;
 - f. the number of gallons of each cleanup material employed;
 - g. the total VOC emissions from all inks, adhesives, and cleanup materials employed, in pounds or tons;
 - h. the total number of hours the emissions unit was in operation; and
 - i. the average hourly VOC emission rate for all inks and cleanup materials, i.e., (f)/(g), in pounds per hour (average).
2. The permittee shall collect and record the following information each month for emissions units K003, K005, and K006 combined:
 - a. the name and identification of each ink, adhesive, and cleanup material employed;
 - b. the VOC content of each ink, adhesive, and cleanup material, in pounds per gallon;
 - c. the single HAP content of each ink, adhesive, and cleanup material, in pounds per gallon;
 - d. the combined HAPs content of each ink, adhesive, and cleanup material, in pound per gallon;
 - e. the number of gallons of each ink, adhesive, and cleanup material employed;
 - f. the total gallons of inks, total gallons of adhesives, and total gallons of cleanup materials employed;
 - g. the total VOC emissions from all inks, adhesives, and cleanup materials employed, in pounds or tons;
 - h. the emissions of each single HAP from all inks, adhesives, and cleanup materials employed, in pounds or tons; and
 - i. the emissions of combined HAPs from all inks, adhesives, and cleanup materials employed, in pounds or tons.
3. The permittee shall collect and record the following information each year for the entire facility:
 - a. the total VOC emissions, in pounds or tons;
 - b. the emissions of each individual HAP, in pounds or tons; and
 - c. the emissions of combined HAPs, in pounds or tons.
4. The permittee shall collect and record the following facility-wide information every year for the purpose of determining inks usage:
 - a. the name and identification of each ink employed;
 - b. the density of each ink, in pounds per gallon;
 - c. the number of gallons of each ink employed; and
 - d. the total ink usage, in pounds or tons.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. an identification of each hour during which the VOC emissions from this emissions unit exceeded 2.0 pounds per hour, and the actual VOC emissions for each such hour;
 - b. an identification of each day during which a ink or adhesive other than a water based ink or adhesive is employed in this emissions unit, and the actual amount of such ink or adhesive employed for each such day.
 - c. an identification of each rolling 12-month period during which the single HAP emission from the entire facility exceeding 10 tons, and the actual single HAP emissions for each such rolling 12-month period; and
 - d. an identification of each rolling 12-month period during which the combined HAP emissions from the entire facility exceeding 25 tons, and the actual emissions of combined HAPs for each such rolling 12-month period.
2. All deviation (excursion) reports shall be submitted in accordance with Section 3.b of the General Terms and Conditions.
3. The permittee shall submit annual reports which summarize VOC emissions from this emissions unit and the ink usage for the entire facility for the previous calendar year. These reports shall be submitted by January 31 of

each year.

4. The permittee shall also submit annual reports which summarize the emissions of VOC, each single HAP, and combined HAPs from the entire facility. The reports shall include the emission calculations, shall be submitted by January 31 of each year, and shall cover the previous calendar year.
5. The permittee shall submit an initial notification report for this emissions unit no later than 120 days after initial startup to the Director (the Cleveland Bureau of Air Pollution Control). The notification shall provide the following information and shall be delivered or postmarked with the notification required in paragraph 63.9 (b)(5) of 40 CFR part 60:
 - a. the name and address of the owner or operator;
 - b. the address (i.e., physical location) of the affected source;
 - c. an identification of the relevant standard, or other requirement, that is the basis of the notification and the source's compliance date;
 - d. a brief description of the nature size, design, and method of operation of the emissions unit, including its operating design capacity and an identification of each point of emission for each HAP, or if a definitive identification is not yet possible, a preliminary identification of each point of emission for each HAP; and
 - e. a statement of whether the affected source is a major source or an area source.

E. Testing Requirements

1. Compliance with the emission limitations in section A.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation: 2.0 lbs/hour of VOC
Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section C.1.
 - b. Emission Limitation: 8.76 tons/year of VOC
Applicable Compliance Method: Compliance shall be determined based upon the record keeping specified in section C.1 and shall be the sum of the daily VOC emission rates for the calendar year.
2. Compliance with the emission limitations in section A.2 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation: < 10 tons per each rolling 12-month period of each HAP at the facility
Applicable Compliance Method: Compliance with the above limit shall be determined based upon the record keeping requirements specified in section C.3
 - b. Emission Limitation: < 25 tons per each rolling 12-month period of any combination of HAP at the facility
Applicable Compliance Method: Compliance with the above limit shall be determined based upon the record keeping requirements specified in section C.3
3. U.S. EPA Methods 24 and 24A shall be used to determine the VOC contents for all inks and cleanup materials.
4. Formulation data shall be used to determine the HAP contents of the inks and cleanup materials.

F. Miscellaneous Requirements

1. None