

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

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

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

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

[Go to Part II for Emissions Unit K005](#)

[Go to Part II for Emissions Unit K006](#)

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

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

[Go to the top of this document](#)

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>
K005: Ward Die Cutter 125	OAC rule 3745-31-05(A)(3) (PTI 13-3017 issued 10/04/1995)	The permittee shall not cause, allow or permit the discharge into the ambient air in excess of 2.0 lbs VOC/hr and 8.76 TPY including cleanup material. See section A.2.c.
		See section A.2.a to A.2.b.
	40 CFR 63 Subpart KK	See section B.1.
	OAC rule 3745-21-09(Y)(2)(b)	

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) for emission units K003, K005, K006, and K007, 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 for emission units K003, K005, K006, and K007, 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 and 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 use complying coatings (adhesives and inks) and soap-based cleaning agents with a maximum VOC content of 0.5 lb/gal.

B. Operational Restrictions

1. The total maximum ink, coating, and adhesive usage in all flexographic, packaging rotogravure, and publication rotogravure printing lines at this facility (emission units K003, K005, K006, and K007) 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 month for this emissions unit:
 - a. the name and identification number of each ink, coating, adhesive, and cleanup material, as applied;
 - b. the VOC content (excluding water and exempt solvents) of each ink, coating, adhesive, and cleanup material, in pounds per gallon;
 - c. the number of gallons (excluding water and exempt solvents) of each ink, coating, adhesive, and cleanup material employed;

- d. the total VOC emissions from all inks, coatings, adhesives, and cleanup materials employed, in pounds per month;
 - e. the total number of hours the emissions unit was in operation; and
 - f. the average hourly VOC emission rate for all inks, coatings, adhesives, and cleanup materials, i.e. (d/e), in pounds per hour.
2. The permittee shall collect and record the following information each month for emissions units K003, K005, K006, and K007 combined:
 - a. the name and identification of each ink, coating, adhesive, and cleanup material employed;
 - b. the single HAP content of each ink, coating, adhesive, and cleanup material, in pounds per gallon;
 - c. the combined HAPs content of each ink, coating, adhesive, and cleanup material, in pound per gallon;
 - d. the number of gallons of each ink, coating, adhesive, and cleanup material employed;
 - e. the total gallons of inks, total gallons of coatings, total gallons of adhesives, and total gallons of cleanup materials employed;
 - f. the emissions of each single HAP from all inks, adhesives, and cleanup materials employed, in pounds or tons; and
 - g. the emissions of combined HAPs from all inks, coatings, adhesives, and cleanup materials employed, in pounds or tons.
 3. The permittee shall collect and record the following information each year on a rolling, 12-month summation for K003, K005, K006, and K007:
 - a. the emissions of each individual HAP, in pounds or tons; and
 - b. the emissions of combined HAPs, in pounds or tons.
 4. The permittee shall collect and record the following facility-wide information for all flexographic, packaging rotogravure, and publication rotogravure printing lines (emission units K003, K005, K006, and K007) every year for the purpose of determining ink, coating, and adhesive usage:
 - a. the name and identification of each ink, coating, and adhesive employed;
 - b. the density of each ink, coating, and adhesive, in pounds per gallon;
 - c. the number of gallons of each ink, coating, and adhesive employed; and
 - d. the total ink, coating, and adhesive 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, coating, adhesive, or cleanup material other than a water based ink, coating, adhesive, or cleanup material with a VOC content less than 0.5 lb/gal is employed in this emissions unit, and the actual amount of such ink, coating, adhesive or cleanup material 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. The permittee shall submit annual reports which summarize VOC emissions from this emissions unit and the total ink, coating, and adhesive usage for all flexographic, packaging rotogravure, and publication rotogravure printing lines (emission units K003, K005, K006, and K007) at the facility for the previous calendar year. These reports shall be submitted by January 31 of each year.
3. The permittee shall also submit annual reports which summarize the emissions of each single HAP and combined HAPs from emission units K003, K005, K006, and K007. The reports shall include the emission calculations, shall be submitted by January 31 of each year, and shall cover the previous calendar year.

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:
The permittee shall not cause, allow or permit the discharge into the ambient air in excess of 2.0 lbs VOC/hr including cleanup material.

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

The permittee shall not cause, allow or permit the discharge into the ambient air in excess of 8.76 TPY including cleanup material.

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.

c. Emission Limitation:

Use less than 10 tons per each rolling 12-month period of each HAP for K003, K005, K006, and K007

Applicable Compliance Method:

Compliance with the above limit shall be determined based upon the record keeping requirements specified in section C.2.

d. Emission Limitation:

Use less than 25 tons per each rolling 12-month period of any combination of HAP for K003, K005, K006, and K007.

Applicable Compliance Method:

Compliance with the above limit shall be determined based upon the record keeping requirements specified in section C.2.

e. Emission Limitation:

The permittee shall use complying coatings (adhesives and inks) and soap-based cleaning agents with a maximum VOC content of 0.5 lb/gal.

Applicable Compliance Method:

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

2. Formulation data or U.S. EPA Method 24 (40 CFR Part 60, Appendix A) shall be used to determine the VOC content of the coatings/adhesives and cleanup materials. The CDAQ or Ohio EPA may require that U.S. EPA Method 24 be used to determine the VOC content of the coatings/adhesives and cleanup materials. If an owner or operator determines that Method 24 cannot be used for a particular coating/adhesive or cleanup material, the permittee shall so notify the administrator of the U.S. EPA and shall use formulation data for that coating, adhesive, or cleanup material to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24.

F. Miscellaneous Requirements

1. None

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

Facility ID: 1318003469 Emissions Unit ID: K006 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

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>
K006: Ward Die Cutter 126 66" x 133" two-color flexographic printer	OAC rule 3745-31-05(A)(3) (PTI 13-3205 issued 03/17/1997)	The permittee shall not cause, allow or permit the discharge into the ambient air in excess of 2.0 lbs VOC/hr and 8.76 TPY including cleanup material. See section A.2.c.
		See section A.2.a to A.2.b.
	40 CFR 63 Subpart KK	See section B.1.
	OAC rule 3745-21-09(Y)(2)(b)	

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) for emission units K003, K005, K006, and K007, 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 for emission units K003, K005, K006, and K007, 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 and 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 use complying coatings (adhesives and inks) and soap-based cleaning agents.

B. Operational Restrictions

1. The total maximum ink, coating, and adhesive usage in all flexographic, packaging rotogravure, and publication rotogravure printing lines at this facility (emission units K003, K005, K006, and K007) 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 month for this emissions unit:
- a. the name and identification number of each ink, coating, adhesive, and cleanup material, as applied;
 - b. the VOC content (excluding water and exempt solvents) of each ink, coating, adhesive, and cleanup material, in pounds per gallon;
 - c. the number of gallons (excluding water and exempt solvents) of each ink, coating, adhesive, and cleanup material employed;
 - d. the total VOC emissions from all inks, coatings, adhesives, and cleanup materials employed, in pounds per month;
 - e. the total number of hours the emissions unit was in operation; and
 - f. the average hourly VOC emission rate for all inks, coatings, adhesives, and cleanup materials, i.e. (d/e), in pounds per hour.
2. The permittee shall collect and record the following information each month for emissions units K003, K005, K006, and K007 combined:
- a. the name and identification of each ink, coating, adhesive, and cleanup material employed;
 - b. the single HAP content of each ink, coating, adhesive, and cleanup material, in pounds per gallon;
 - c. the combined HAPs content of each ink, coating, adhesive, and cleanup material, in pound per gallon;
 - d. the number of gallons of each ink, coating, adhesive, and cleanup material employed;
 - e. the total gallons of inks, total gallons of coatings, total gallons of adhesives, and total gallons of cleanup materials employed;
 - f. the emissions of each single HAP from all inks, coatings, adhesives, and cleanup materials employed, in pounds or tons; and
 - g. the emissions of combined HAPs from all inks, coatings, adhesives, and cleanup materials employed, in pounds or tons.
3. The permittee shall collect and record the following information each year on a rolling, 12-month summation for emissions units K003, K005, K006, and K007:
- a. the emissions of each individual HAP, in pounds or tons; and
 - b. the emissions of combined HAPs, in pounds or tons.
4. The permittee shall collect and record the following facility-wide information for all flexographic, packaging rotogravure, and publication rotogravure printing lines (emission units K003, K005, K006, and K007) every year for the purpose of determining ink, coating, and adhesive usage:
- a. the name and identification of each ink, coating, and adhesive employed;
 - b. the density of each ink, coating, and adhesive, in pounds per gallon;
 - c. the number of gallons of each ink, coating, and adhesive employed; and
 - d. the total ink, coating, and adhesive 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, coating, adhesive, or cleanup material other than a water based ink, coating, adhesive, or cleanup material is employed in this emissions unit, and the actual amount of such ink, coating, adhesive or cleanup material 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. The permittee shall submit annual reports which summarize VOC emissions from this emissions unit and the total ink, coating, and adhesive usage for all flexographic, packaging rotogravure, and publication rotogravure printing lines (emission units K003, K005, K006, and K007) at the facility for the previous calendar year. These reports shall be submitted by January 31 of each year.
 3. The permittee shall also submit annual reports which summarize the emissions of each single HAP and combined HAPs from emission units K003, K005, K006, and K007. The reports shall include the emission calculations, shall be submitted by January 31 of each year, and shall cover the previous calendar year.
- 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:
The permittee shall not cause, allow or permit the discharge into the ambient air in excess of 2.0 lbs VOC/hr including cleanup material.

Applicable Compliance Method:
Compliance shall be determined based upon the record keeping specified in section C.1.
 - b. Emission Limitation:
The permittee shall not cause, allow or permit the discharge into the ambient air in excess of 8.76 TPY including cleanup material.

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.
 - c. Emission Limitation:
Use less than 10 tons per each rolling 12-month period of each HAP for emission units K003, K005, K006, and K007

Applicable Compliance Method:
Compliance with the above limit shall be determined based upon the record keeping requirements specified in section C.2.
 - d. Emission Limitation:
Use less than 25 tons per each rolling 12-month period of any combination of HAP for emission units K003, K005, K006 and K007

Applicable Compliance Method:
Compliance with the above limit shall be determined based upon the record keeping requirements specified in section C.2.
 2. Formulation data or U.S. EPA Method 24 (40 CFR Part 60, Appendix A) shall be used to determine the VOC content of the coatings/adhesives and cleanup materials. The CDAQ or Ohio EPA may require that U.S. EPA Method 24 be used to determine the VOC content of the coatings/adhesives and cleanup materials. If an owner or operator determines that Method 24 cannot be used for a particular coating/adhesive or cleanup material, the permittee shall so notify the administrator of the U.S. EPA and shall use formulation data for that coating, adhesive, or cleanup material to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24.
- F. **Miscellaneous Requirements**
 1. None