Ohio Environmental Protection Agency

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

Certified Mail

12/23/2015

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

Mike Smith
Plastic Packaging Technologies, LLC
4041 Roberts Rd.
Columbus, OH 43228

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0125041958
Permit Number: P0120000
Permit Type: Administrative Modification
County: Franklin

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 Ohio EPA DAPC, Central District Office at (614)728-3778or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

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

Cc: Ohio EPA-CDO

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
Plastic Packaging Technologies, LLC

Facility ID:	0125041958
Permit Number:	P0120000
Permit Type:	Administrative Modification
Issued:	12/23/2015
Effective:	12/23/2015
Expiration:	9/17/2018

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
Plastic Packaging Technologies, LLC

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Authorization

Facility ID:	0125041958
Application Number(s):	M0003722
Permit Number:	P0120000
Permit Description:	Administrative modification to extend testing required-by date and incorporate K012 into group limits.
Permit Type:	Administrative Modification
Permit Fee:	$300.00
Issue Date:	12/23/2015
Effective Date:	12/23/2015
Expiration Date:	9/17/2018

Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Plastic Packaging Technologies, LLC
4041 ROBERTS RD
COLUMBUS, OH 43228

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:

Ohio EPA DAPC, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049
(614)728-3778

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: P0120000
Permit Description: Administrative modification to extend testing required-by date and incorporate K012 into group limits.

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

Emissions Unit ID:	**P001**
Company Equipment ID:	Coating Mixing Room
Superseded Permit Number:	P0119006
General Permit Category and Type:	Not Applicable

Group Name: Flexographic Presses

Emissions Unit ID:	**K009**
Company Equipment ID:	Amber Press
Superseded Permit Number:	P0119006
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**K011**
Company Equipment ID:	Emerald 130-10 color press
Superseded Permit Number:	P0119006
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. and 5.

2. The emissions of hazardous air pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from all emissions units at this facility, including but not limited to any de minimis emissions units as defined in OAC rule 3745-15-05, and any registration status and/or permit exempt/permit-by-rule emissions units pursuant to OAC rule 3745-31-03, combined, shall not exceed 9.9 tons per year for any individual HAP and 24.9 tons per year for any combination of HAPs, based upon rolling, 12-month summations of the HAP emissions.

3. The permittee shall maintain monthly records of the following information for the entire facility:

   a) the facility-wide individual HAP emissions, in tons per month;

   b) the facility-wide combined HAPs emissions, in tons per month;

   c) the rolling, 12-month summation of facility-wide individual HAP emissions, in tons; and

   d) the rolling, 12-month summation of facility-wide combined HAPs emissions, in tons.

4. 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:

      (1) all exceedances of the rolling, 12-month individual HAP emission limitation; and

      (2) all exceedances of the rolling, 12-month combined HAPs emission limitation.

   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).

   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 (Ohio EPA, Central District Office).

5. Compliance with the rolling, 12-month HAP emissions limitations specified in section B.2 of these terms and conditions shall be determined in accordance with the recordkeeping requirements of section B.3.

6. 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.

C. Emissions Unit Terms and Conditions

1. P001, Coating Mixing Room

Operations, Property and/or Equipment Description:

ink and solvent mixing room

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. b)(1)b., b)(2)b., b)(2)c., b)(2)d., c)(1), d)(1), d)(2), d)(3), d)(4), e)(2), f)(1), f)(2)b., and f)(2)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 3745-31-05(A)(3)	Volatile organic compound (VOC) emissions shall not exceed 0.14 pound per hour. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D). See b)(2)a. through b)(2)d. and c)(1) below.
b.	OAC rule 3745-31-05(D) (Federally enforceable limitations to avoid Title V and the classification as a major source of HAP)	See Facility-Wide Terms and Conditions above and b)(2)b. through b)(2)d. and c)(1) below.

(2) Additional Terms and Conditions

a. The hourly VOC emissions limitation was established to reflect the potential-to-emit for this emissions unit. It is not necessary to develop monitoring, recordkeeping, or reporting requirements to ensure compliance with this limitation.

b. The VOC emissions from emissions units K009, K011, K012, and P001 combined shall not exceed 38.0 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

c. The overall control efficiency (capture and control) of the thermal incinerator controlling VOC and HAP emissions from this emissions unit shall be at least 95%, by weight.

d. The permanent total enclosure (PTE) 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, and shall capture all of the emissions from this emissions unit.

c) Operational Restrictions

(1) All of the emissions from this emissions unit shall be vented to the/a thermal incinerator that shall meet the operational, monitoring, and recordkeeping requirements of this permit when the emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

(1) In order to maintain compliance with the applicable emissions limitation(s) contained in this permit, the acceptable average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit(s) controlled by the thermal incinerator is/are in operation, shall not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance. Until compliance testing has been conducted, the thermal incinerator shall be operated and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manual.

(2) The permittee shall properly install, operate, and maintain continuous temperature monitors and recorder(s) that measure(s) and record(s) the temperature within the thermal incinerator when the emissions unit(s) is/are in operation, including periods of start-up and shut-down. 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 monitors and recorder(s) shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instruction, and the operating manuals, with any modifications deemed necessary by the permittee. Following compliance testing, the permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:

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

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

(3) The permittee shall maintain the records of the results from the stack testing conducted to demonstrate compliance with the capture and control efficiency of the thermal incinerator.

(4) The permittee shall maintain monthly records of the following information for emissions units K009, K011, K012, and P001:

a. the company identification for each ink, solvent, and clean-up material employed;

b. the number of gallons or pounds of each ink, solvent, and clean-up material employed;

c. the VOC, individual HAP, and combined HAPs contents of each ink, solvent, and clean-up material employed, in pounds per gallon or percent by weight;

d. the total uncontrolled VOC emissions from emissions units K009, K011, K012, and P001 from all inks, solvents, and clean-up materials employed, in pounds per month;

e. the total controlled VOC, individual HAP, and combined HAPs emissions from emissions units K009, K011, K012, and P001, in pounds per month. The controlled emissions shall be calculated using the overall control efficiency for the control equipment, as determined during the most recent emissions test, that demonstrated emissions units K009, K011, K012, and P001 were in compliance; and

f. the rolling, 12-month summation of total controlled VOC, individual HAP, and combined HAPs emissions from emissions units K009, K011, K012, and P001, in tons.

e) Reporting Requirements

(1) 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 PER shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

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

a. all deviations (excursions) of the following emissions limitations, operational restrictions, and/or control device operating parameter limitations that restrict the

potential-to-emit of any regulated air pollutant and have been detected by the monitoring, recordkeeping, and/or testing requirements in this permit:

i. all exceedances of the rolling, 12-month VOC emission limitation;

ii. each period of time (start time and date, and end time and date) when the average combustion temperature within the thermal incinerator was outside of the range specified by the manufacturer and/or outside of the acceptable range following any required compliance demonstration;

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

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 (Ohio EPA, Central District Office).

f) Testing Requirements

(1) 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 60 days of emissions unit K012 achieving the maximum production rate at which it will be operated, but not later than July 1, 2016.

b. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency (capture and control) of the thermal incinerator.

c. The following test method(s) shall be employed to demonstrate compliance with the overall control efficiency requirement:

i. Method 1 of 40 CFR Part 60, Appendix A (for sample and velocity traverses);

ii. Method 2 of 40 CFR Part 60, Appendix A (for velocity and volumetric flow rates);

iii. Method 3 of 40 CFR Part 60, Appendix A (for molecular weight of dry gas stream);

iv. Method 4 of 40 CFR Part 60, Appendix A (for moisture content of gas stream);

v. Methods 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A (for VOC emissions); and

vi. Methods 204 through 204F of 40 CFR Part 51, Appendix M (for capture efficiency), or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with U.S. EPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995.

d. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the Ohio EPA, Central District Office. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emissions rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.

e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. 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 the Ohio EPA, Central District Office's refusal to accept the results of the emissions test(s).

f. Personnel from the Ohio EPA, Central District Office 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 emission unit and/or the performance of the control equipment.

g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person(s) responsible for the tests and submitted to the Ohio EPA, Central District Office 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 the Ohio EPA, Central District Office.

(2) 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. Emissions Limitation:

Volatile organic compound (VOC) emissions shall not exceed 0.14 pound per hour.

Applicable Compliance Method:

Compliance with the hourly VOC limitation may be determined based upon the following calculation.

E = [(MR) x (EF) / (2,000 lb/ton)] x (1 – CE), where:

MR= maximum production mixing rate (187 lb/hr)
EF= Emission factor specified in AP-42, "Compilation of Air Pollutant Emission Factors", 5th Edition, Section 6.4, Table 6.4-1 (5/83) (30 lb VOC/ton)
CE= control efficiency of the thermal incinerator (95%)

b. Emissions Limitation:

The VOC emissions from emissions units K009, K011, K012, and P001 combined shall not exceed 38.0 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance shall be determined based upon the recordkeeping requirements specified in d)(4).

c. Emissions Limitation:

The overall control efficiency (capture and control) of the thermal incinerator controlling VOC and HAP emissions from this emissions unit shall be at least 95% by weight.

Applicable Compliance Method:

Compliance shall be determined in accordance with the testing requirement in f)(1) above.

g) Miscellaneous Requirements

(1) None.

2. Emissions Unit Group -Flexographic Presses: K009,K011,

EU ID	Operations, Property and/or Equipment Description
K009	8-color amber press with two natural gas-fired (indirect) drying ovens
K011	emerald 130-10 color press with two natural gas-fired (indirect) drying ovens

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. b)(1)e., b)(2)b., b)(2)c., b)(2)d., c)(1), d)(1), d)(2), d)(3), d)(4), e)(2), f)(1), f)(2)e., and f)(2)f.

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 3745-17-07(A)(1)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
b.	OAC rule 3745-17-10(B)(1)	The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-21-09(Y)	The emissions limitation specified by this rule are less stringent than the emissions limitations established pursuant to OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-31-05(A)(3)	Volatile organic compound (VOC) emissions from the coating process shall not exceed 3.8 pounds per hour.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Nitrogen oxides (NO_x) emissions from the ovens shall not exceed 0.08 pound per hour and 0.34 ton per year. Particulate emissions (PE) from the ovens shall not exceed 0.001 pound per hour and 0.007 ton per year. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-31-05(D). See b)(2)a. through b)(2)e. and c)(1) below.
e.	OAC rule 3745-31-05(D) (Federally enforceable limitations to avoid Title V and classification as a major source of HAP)	See Facility-Wide Terms and Conditions above and b)(2)b. through b)(2)d. and c)(1) below.

(2) Additional Terms and Conditions

a. The hourly VOC emission limitations, as well as the hourly and annual NO_x and PE emissions limitations, were established to reflect the potential-to-emit for this emissions unit. It is not necessary to develop monitoring, recordkeeping, or reporting requirements to ensure compliance with these limitations.

b. The VOC emissions from emissions units K009, K011, K012, and P001 combined shall not exceed 38.0 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

c. The overall control efficiency (capture and control) of the thermal incinerator controlling VOC and HAP emissions from this emissions unit shall be at least 95%, by weight.

d. The permanent total enclosure (PTE) 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, and shall capture all of the coating process emissions from this emissions unit.

e. The permittee shall burn only natural gas in this emissions unit.

c) Operational Restrictions

(1) All of the coating process emissions from this emissions unit shall be vented to the/a thermal incinerator that shall meet the operational, monitoring, and recordkeeping requirements of this permit when the emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

(1) In order to maintain compliance with the applicable emissions limitation(s) contained in this permit, the acceptable combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit(s) controlled by the thermal incinerator is/are in operation, shall not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance. Until compliance testing has been conducted, the thermal incinerator shall be operated and maintained in accordance with the manufacturer's recommendations, instruction, and the operating manual.

(2) The permittee shall properly install, operate, and maintain continuous temperature monitors and recorder(s) that measure(s) and record(s) the temperature within the thermal incinerator when the emissions unit(s) is/are in operation, including periods of start-up and shut-down. 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 monitors and recorder(s) shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. Following compliance testing, the permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:

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

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

The permittee may use a temperature chart recorder or equivalent recording device as the log that documents the temperature within the thermal incinerator. These records shall be maintained at the facility for a period of no less than 3 years.

(3) The permittee shall maintain the records of the results from the stack testing conducted to demonstrate compliance with the capture and control efficiency of each of the subject flexographic printing lines.

(4) The permittee shall maintain monthly records of the following information for emissions units K009, K011, K012, and P001.

a. the company identification for each ink, solvent, and clean-up material employed;

b. the number of gallons or pounds of each ink, solvent, and clean-up material employed;

c. the VOC, individual HAP, and combined HAPs contents of each ink, solvent, and clean-up material employed, in pounds per gallon or percent by weight;

d. the total uncontrolled VOC emissions from emissions units K009, K011, K012, and P001 from all inks, solvents, and clean-up materials employed, in pounds per month;

e. the total controlled VOC, individual HAP, and combined HAPs emission from emissions units K009, K011, K012, and P001, in pounds per month. The controlled emissions shall be calculated using the overall control efficiency for the control equipment, as determined during the most recent emission test that demonstrated emissions units K009, K011, K012, and P001 were in compliance; and

f. the rolling, 12-month summation of total controlled VOC, individual HAP, and combined HAPs emissions from emissions units K009, K011, K012, and P001, in tons.

(5) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

e) Reporting Requirements

(1) 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.

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

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

i. all exceedances of the rolling, 12-month VOC emissions limitation;

ii. each period of time (start time and date, and end time and date) when the average combustion temperature within the thermal incinerator was outside of the range specified by the manufacturer and/or outside of the acceptable range following any required compliance demonstration;

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

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 (Ohio EPA, Central District Office).

(3) The permittee shall submit deviation (excursions) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

f) Testing Requirements

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

a. The emissions testing shall be conducted within 60 days of emissions unit K012 achieving the maximum production rate at which it will be operated, but not later than July 1, 2016.

b. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency (capture and control) of the thermal incinerator.

c. The following test method(s) shall be employed to demonstrate compliance with the overall control efficiency requirement:

i. Method 1 of 40 CFR Part 60, Appendix A (for sample and velocity traverses);

ii. Method 2 of 40 CFR Part 60, Appendix A (for velocity and volumetric flow rates);

iii. Method 3 of 40 CFR Part 60, Appendix A (for molecular weight of dry gas stream);

iv. Method 4 of 40 CFR Part 60, Appendix A (for moisture content of gas stream);

v. Methods 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A (for VOC emissions); and

vi. Methods 204 through 204F of 40 CFR Part 51, Appendix M (for capture efficiency), or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with U.S. EPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995.

d. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the Ohio EPA, Central District Office. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.

e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. 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 the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

f. Personnel from the Ohio EPA, Central District Office 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.

g. 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 the Ohio EPA, Central District Office 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 the Ohio EPA, Central District Office.

(2) 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. <u>Emissions Limitation:</u>

Visible particulate emissions from the stack shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.

<u>Applicable Compliance Method:</u>

If required, compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

b. Emissions Limitation:

Volatile organic compound (VOC) emissions from the coating process shall not exceed 3.8 pounds per hour.

Applicable Compliance Method:

Compliance with the hourly VOC limitation may be determined based upon the following calculation.

$E = [(Ink) \times (VOC_{Ink}) + (Solvent) \times (VOC_{solvent})] \times (1 - CE)$, where:

Ink= maximum ink usage (3.2 gal/hr)
VOC_{Ink}= maximum VOC content of ink (8.60 lb/gal)
Solvent= maximum solvent usage (7.0 gal/hr)
$VOC_{solvent}$= maximum VOC content of solvent (6.58 lb/gal)
CE= control efficiency of the thermal incinerator (95%)

c. Emissions Limitation:

Nitrogen oxide (NO_x) emissions from the ovens shall not exceed 0.08 pound per hour and 0.34 ton per year.

Applicable Compliance Method:

The hourly NO_x emissions from the combustion of natural gas in the ovens were calculated using the maximum fuel input to the ovens (784 scf/hr), the NOx emission factor specified in AP-42, "Compilation of Air Pollutant Emission Factors", 5th Edition, Section 1.4, Table 1.4-1 (7/98) and the following equation.

$NO_x = (100 \text{ lb } NO_x/10^6 \text{scf}) \times (784 \text{ scf/hr})$

The annual NO_x emissions from the combustion of natural gas in the ovens were calculated by multiplying the hourly emissions by 8,760 hr/yr and then dividing by 2,000 lb/ton.

d. Emissions Limitation:

Particulate emissions (PE) from the ovens shall not exceed 0.001 pound per hour and 0.007 ton per year.

Applicable Compliance Method:

PE from the combustion of natural gas in the ovens were calculated using the maximum fuel input to the ovens (784 scf/hr), the PE factor specified in AP-42, "Compilation of Air Pollutant Emission Factors", 5th Edition, Section 1.4, Table 1.4-2 (7/98) and the following equation.

$PE = (1.9 \text{ lb } PE/10^6 \text{scf})) \times (784 \text{ scf/hr})$

The annual PE from the combustion of natural gas in the ovens were calculated by multiplying the hourly emissions by 8,760 hr/yr and then dividing by 2,000 lb/ton.

e. Emissions Limitation:

The VOC emissions from emissions units K009, K011, K012 and P001 combined shall not exceed 38.0 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance shall be determined based upon the recordkeeping requirements specified in d)(4).

f. Emissions Limitation:

The overall control efficiency (capture and control) of the thermal incinerator controlling VOC and HAP emissions from this emissions unit shall be at least 95% by weight.

Applicable Compliance Method:

Compliance shall be determined in accordance with the testing requirement in f)(1) above.

g) Miscellaneous Requirements

(1) None.