State of Ohio Environmental Protection Agency

RE: DRAFT PERMIT TO INSTALL **CERTIFIED MAIL**
PORTAGE COUNTY

Street Address: Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329 Mailing Address: Lazarus Gov. Center

Application No: 16-02186

DATE: 12/6/2001

Schneller Inc
Mark Stewart
6019 Powdermill Road
Kent, OH 44240

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

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

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

Thomas G. Rigo
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA ARAQMD Akron Met Area Trans Study WV PA

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install **Issue Date: To be entered upon final issuance**
Terms and Conditions **Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 16-02186

Application Number:	16-02186
APS Premise Number:	1667040015
Permit Fee:	**To be entered upon final issuance**
Name of Facility:	Schneller Inc
Person to Contact:	Mark Stewart
Address:	6019 Powdermill Road Kent, OH 44240

Location of proposed air contaminant source(s) [emissions unit(s)]:
6019 Powdermill Rd
Kent, Ohio

Description of proposed emissions unit(s):
100 Line Coater.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

A. State and Federally Enforceable Permit To Install General Terms and Conditions

1. Monitoring and Related Recordkeeping and Reporting Requirements

a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

i. The date, place (as defined in the permit), and time of sampling or measurements.

ii. The date(s) analyses were performed.

iii. The company or entity that performed the analyses.

iv. The analytical techniques or methods used.

v. The results of such analyses.

vi. The operating conditions existing at the time of sampling or measurement.

b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

ii. Quarterly written reports of (i) any deviations from federally enforceable <u>emission limitations</u>, <u>operational restrictions</u>, <u>and control device operating parameter limitations</u>, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.10 below if no deviations occurred during the quarter.

iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.
Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

6. General Requirements

a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d. This permit does not convey any property rights of any sort, or any exclusive privilege.

e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit To Install fees within 30 days after the issuance of this Permit To Install.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit

shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.

iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Permit To Operate Application

a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35 , the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the source(s) covered by this permit.

11. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

B. State Only Enforceable Permit To Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

4. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

5. Termination of Permit To Install

This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

6. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

7. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

8. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

9. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit To Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

10. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

C. Permit To Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons Per Year
VOC	71.2 per rolling 12-month period

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements
	40 CFR Part 63, subpart KK
K003 - Reverse roll coater and rotogravure print station - 100 line coater (the terms and conditions in this permit supercede the terms and conditions in PTI 16-1601 issued on 6/11/1997).	OAC rule 3745-31-05(A)(3)
	OAC rule 3745-31-05(D)
	OAC rule 3745-21-09(B)(6)
	OAC rule 3745-21-09(H)
	40 CFR Part 60 Subpart FFF

Applicable Emissions Limitations/Control Measures	
40.7 lbs/hr of volatile organic compounds (VOC) for coatings and cleanup materials See A.I.2.a below.	This emissions unit shall demonstrate compliance with 40 CFR Part 63, subpart KK by meeting the requirements of 40 CFR 63.821(a)(2)(ii) as outlined in sections A.I.2.b and A.III.6 below.
71.2 TPY of VOC as a rolling, 12-month summation for coatings and cleanup materials See A.II.1 below.	
The emission control requirements specified by this rule are less stringent than the emission control requirements established pursuant to OAC rule 3745-31-05(A)(3).	
The emission control requirements specified by this rule are less stringent than the emission control requirements established pursuant to OAC rule 3745-31-05(A)(3).	
On the rotogravure printing station, the permittee shall employ inks with a weighted average VOC content less than 1.0 kilogram VOC per kilogram ink solids.	

2. Additional Terms and Conditions

2.a The thermal incinerator shall achieve a control (destruction) efficiency which is at least 96 percent, by weight, and the capture efficiency shall be at least 92.2 percent, by weight for volatile organic compounds.

2.b The sum of the total mass of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, and other materials applied by the press using product and packaging rotogravure work stations in each month shall never exceed five percent, by weight, of the total mass of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, and other materials applied by the press in that month, including all inboard and outboard stations.

II. Operational Restrictions

1. The maximum annual operating hours for this emissions unit to apply solvent based materials shall not exceed 3500, based upon a rolling, 12-month summation of the operating hours.

2. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 1350 degrees Fahrenheit or shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance.

3. The VOC vented to the thermal incinerator from K003, K004, and K005 shall not exceed 554 pounds per hour.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information:

   a. the operating hours for each month; and

   b. the rolling, 12-month summation of the operating hours; and

   c. the rolling, 12-month summation of the emissions of VOC.

2. The permittee shall collect and record the following information for each day for the coating line:

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

   b. the VOC content of each coating and cleanup material, in pounds per gallon, as applied;

c. the number of gallons of each coating and cleanup material employed;

d. the total uncontrolled VOC emissions from all coatings, in pounds per day;

e. the total uncontrolled VOC emissions from all cleanup materials, in pounds per day;

f. the calculated, controlled VOC emission rate for all coatings, in pounds per day (the controlled emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance);

g. the total calculated VOC emission rate for all coatings and cleanup materials, in pounds per day (i.e., (e) plus (f));

h. the total number of hours the emissions unit was in operation;

i. the average hourly VOC emissions rate for all coating and cleanup materials in pound(s) per hour (i.e., (g)/(h));

j. the average hourly uncontrolled VOC emissions vented to the incinerator, in pounds per hour (i.e., (d)/(h)); and

k. the total average hourly VOC emissions vented to the incinerator, in pounds per hour from K003, K004, and K005.

3. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

4. The permittee shall collect and record the following information for each day for the control equipment:

a. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit; and

b. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was less than 1350 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance.

5. In order to determine compliance with the VOC content less than 1.0 kilogram VOC per kilogram ink solids, the permittee shall collect and record the following information for each month as long as all inks used contain less than 1.0 kilogram VOC per kilogram ink solids:

   a. the name and identification number of each ink; and

   b. the kilograms of VOC per kilogram ink solids, as applied.

6. If the inks used contain 1.0 kilogram VOC per kilogram ink solids or more, the permittee shall collect and record the following information for each month:

   a. the name and identification number of each ink;

   b. the weight fraction of VOC in each ink used, in kilograms VOC per kilogram ink;

   c. the weight fraction of solids in each ink used, in kilograms solids per kilogram ink;

   d. the total mass of each ink applied, in kilograms;

   e. the name and identification number of each dilution solvent;

   f. the weight fraction of VOC in each dilution solvent added to the printing line, in kilograms VOC per kilogram ink;

   g. the total mass of each dilution solvent added at the print line, in kilograms; and

   h. the weighted average mass of VOC per mass of ink solids applied, in kilograms VOC per kilogram ink solid, as determined in section A.V.5 of these terms and conditions.

7. In order to determine compliance with section A.I.2.b above, the permittee shall maintain the following records for five years and submit them to the Administrator upon request:

   a. the total mass of each material applied each month on the press, including all inboard and outboard stations;

   b. the total mass of each material applied each month on the press by the product and packaging rotogravure printing operations; and

   c. the weight percent of materials applied on the press by the product and packaging rotogravure printing operations (i.e., (b)/(a) times 100).

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month operating hours limitation.

2. The permittee shall submit quarterly summaries of the following records:

   a. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit; and

   b. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, does not comply with the temperature limitation specified above.

   These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

3. The permittee shall submit deviation (excursion) reports which include an identification of each day during which the average hourly VOC emissions exceeded 40.7 lbs/hr, and the actual average hourly VOC emissions for each such day.

4. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for VOC.

5. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

6. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any exceedance of the VOC loading restriction of 554 lbs/hr. The notification shall include a copy of the exceedance determination and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days of the occurrence.

7. The permittee shall also submit annual reports which specify the total organic compound emissions from this emissions unit, in tons, and the total operating hours for the previous calendar year (January through December). These reports shall be submitted by January 31 of each year.

8. The permittee shall submit on a semiannual basis deviation (excursion) reports which include an identification of each month during which the weight-percent of materials applied on the press by the product and packaging rotogravure printing operations exceeded 5 percent, and the actual weight-percent of each such month. These reports shall be submitted by June 30 and December 31 of each year to the Administrator.

9. The performance test data and results from the performance test to show compliance with 1.0

kilogram VOC per kilogram ink solids shall be submitted to the Administrator as specified in section 60.8(a) of 40 CFR Part 63, subpart A.

10. The permittee shall submit on a semiannual basis deviation (excursion) reports which include an identification of each month during which the weighted average VOC content of 1.0 kilogram VOC per kilogram ink solid was exceeded and the actual weighted average VOC content of each such month. These reports shall be submitted by January 30 and July 30 of each year to the Administrator.

11. This emissions unit is subject to the applicable provisions of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60.

    The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

    Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:

    a. construction date (no later than 30 days after such date);

    b. anticipated start-up date (not more than 60 days or less than 30 days prior to such date); and

    c. actual start-up date (within 15 days after such date).

V. 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 6 months prior to Title V permit renewal.

    b. The emission testing shall be conducted to demonstrate compliance with the capture efficiency and control efficiency limitations for VOC

    c. The test method(s) which must be employed to demonstrate compliance with the capture efficiency and control efficiency limitations for VOC are specified below. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

        i. The capture efficiency shall be determined using Methods 204 through 204F, as

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

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

d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

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

3. Personnel from the appropriate Ohio EPA District Office or local air agency 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.

4. 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 appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency.

5. To demonstrate compliance with the VOC content less than 1.0 kilogram VOC per kilogram ink solids, the permittee shall determine the weighted average VOC content of the inks according to the following procedures:

a. Determine and record the VOC content and amount of each ink used at the print head,

including the VOC content and amount of diluent solvent.

b. Compute the weighted average VOC content by the following equation:

G = the summation of i=1 to n for (Woi times Mci) plus the summation of j=1 to m for (Woj times Mdj), then divided by the summation of i=1 to n for (Mci times Wsi)

G=the weighted average mass of VOC per mass of ink solids applied, in kilograms per kilogram

Woi=the weight fraction of VOC in each ink (i) used in the time period as determined from Reference Method 24, manufacturer's formulation data, or plant blending records, in kilograms per kilogram.

Mci=the total mass of each ink (i) applied in the time period as determined from plant records, in kilograms.

Woj=the weight fraction of VOC in each dilution solvent (j) added at the print line in the time period determined from Reference Method 24, manufacturer's formulation data, or plant blending records, in kilograms per kilogram.

Mdj=the total mass of each dilution solvent (j) added at the print line in the time period determined from plant records, in kilograms.

Wsi=means the weight fraction of solids in each ink (i) used in the time period as determined from Reference Method 24, manufacturer's formulation data, or plant blending records, in kilograms per kilogram.

c. The weighted average VOC content of the inks shall be calculated over a period that does not exceed one calendar month, or four consecutive weeks. A facility that uses an accounting system based on quarters consisting of two 28 calendar day periods and one 35 calendar day period may use an averaging period of 35 calendar days four times per year, provided the use of such an accounting system is documented in the initial performance test.

d. Each determination of the weighted average VOC content shall constitute a performance test for any period. Results of the initial performance test must be reported to the Administrator. Reference Method 24 or ink manufacturers' formulation data along with plant blending records (if plant blending is done) may be used to determine VOC content. The Administrator may require the use of Reference Method 24 if there is a question concerning the accuracy of the ink manufacturer's data or plant blending records.

e. If, during the time period, all inks used contain less than 1.0 kilogram VOC per kilogram ink solids, the permittee is not required to calculate the weighted average VOC content, but must verify and record the VOC content of each ink (including any added dilution solvent) used as determined by Reference Method 24, ink manufacturers' formulation data, or plant blending records.

6. Compliance with the emission limitations in Section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

40.7 lbs/hr of VOC

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the recordkeeping of coating and cleanup material usage, VOC content of each coating and cleanup material, and the operating hours per day as required by section A.III.2 above.

b. Emission Limitation:

96 percent control efficiency, by weight
92.2 percent capture efficiency, by weight

Applicable Compliance Method:

Compliance with the control efficiency and capture efficiency shall be determined in accordance with test methods and procedures specified in sections A.V.1 through A.V.4 above.

c. Emission Limitation:

71.2 TPY of VOC as a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the record keeping as required by sections A.III.1 and A.III.2 of these terms and conditions.

d. Emission Limitation:

1.0 kilogram VOC per kilogram ink solid

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the monthly record keeping of the VOC content of each ink and the ink usage as required in section A.III.5 of these terms and conditions and calculations as required in section A.V.5 of these terms and conditions. US EPA Methods 24 or 24A shall be used to determine the VOC content for each ink.

e. Emission Limitation:

5 percent, by weight, materials applied on the press by the product and packaging rotogravure printing operations

Applicable Compliance Method:

Compliance shall be demonstrate in accordance with the monthly record keeping of the total mass of each material applied on the press and on the press by the product and packaging rotogravure printing operations as required by section A.III.6 of these terms

and conditions.

VI. Miscellaneous Requirements

1. The terms and conditions of this Permit to Install shall supersede all the air pollution control requirements for K003 in Permit to Install 16-1601 issued on 6/11/1997, Permit to Install 16-1055 issued on 3/18/1992, and Permit to Install 16-711 issued on 1/25/1989.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K003 - Reverse roll coater and rotogravure print station - 100 line coater (the terms and conditions in this permit supercede the terms and conditions in PTI 16-1601 issued on 6/11/1997).	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None