Ohio Environmental Protection Agency

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

6/6/2016

Certified Mail

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

Ms. Lorie Brengelman
Wingate Packaging, Inc.
12021 Sheraton Lane
Cincinnati, OH 45246

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1431053871
Permit Number: P0119474
Permit Type: Administrative Modification
County: Hamilton

Dear Permit Holder:

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

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**
- **What should you do if you notice a spill or environmental emergency?**

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.

What should you do if you notice a spill or environmental emergency?

Any spill or environmental emergency which may endanger human health or the environment should be reported to the Emergency Response 24-HOUR EMERGENCY SPILL HOTLINE toll-free at (800) 282-9378. Report non-emergency complaints to the appropriate district office or local air agency.

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

Sincerely,

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

Cc: SWOAQA

Response to Comments

Facility ID:	1431053871
Facility Name:	Wingate Packaging, Inc.
Facility Description:	Prints packaging for bacon
Facility Address:	4347 INDECO CT. Cincinnati, OH 45241 Hamilton County
Permit:	P0119474, Permit-To-Install and Operate - Administrative Modification
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the The Cincinnati Enquirer on 04/28/2016. The comment period ended on 05/28/2016.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

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

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

1. Topic: None

a. Comment: None

b. Response: None

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
Wingate Packaging, Inc.

Facility ID:	1431053871
Permit Number:	P0119474
Permit Type:	Administrative Modification
Issued:	6/6/2016
Effective:	6/6/2016
Expiration:	3/11/2020

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
Wingate Packaging, Inc.

Table of Contents

Authorization 1

A. Standard Terms and Conditions 3

1. What does this permit-to-install and operate ("PTIO") allow me to do? 4
2. Who is responsible for complying with this permit? 4
3. What records must I keep under this permit? 4
4. What are my permit fees and when do I pay them? 4
5. When does my PTIO expire, and when do I need to submit my renewal application? 4
6. What happens to this permit if my project is delayed or I do not install or modify my source? 5
7. What reports must I submit under this permit? 5
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? 5
9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? 5
10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report? 7
11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located? 7
12. What happens if one or more emissions units operated under this permit is/are shut down permanently? 7
13. Can I transfer this permit to a new owner or operator? 7
14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"? 8
15. What happens if a portion of this permit is determined to be invalid? 8

B. Facility-Wide Terms and Conditions 9

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). 10

C. Emissions Unit Terms and Conditions 13

1. P001, Cleanup Operations 14
2. Emissions Unit Group - Flexographic Printing Presses: K002, K003, K004, K005, K006, K007 17

Authorization

Facility ID: 1431053871
Application Number(s): A0054168
Permit Number: P0119474
Permit Description: Administrative modification to increase facility-wide VOC emission limit for six individual printing presses.
Permit Type: Administrative Modification
Permit Fee: $700.00
Issue Date: 6/6/2016
Effective Date: 6/6/2016
Expiration Date: 3/11/2020
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Wingate Packaging, Inc.
4347 INDECO CT.
Cincinnati, OH 45241

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

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director

Authorization (continued)

Permit Number: P0119474
Permit Description: Administrative modification to increase facility-wide VOC emission limit for six individual printing presses.

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:	Cleanup Operations
Superseded Permit Number:	P0117474
General Permit Category and Type:	Not Applicable

Group Name: Flexographic Printing Presses

Emissions Unit ID:	**K002**
Company Equipment ID:	Press No. 2
Superseded Permit Number:	P0117474
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**K003**
Company Equipment ID:	Press No. 3
Superseded Permit Number:	P0117474
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**K004**
Company Equipment ID:	Press No. 4
Superseded Permit Number:	P0117474
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**K005**
Company Equipment ID:	Press No. 5
Superseded Permit Number:	P0117474
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**K006**
Company Equipment ID:	Press No. 6
Superseded Permit Number:	P0117474
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**K007**
Company Equipment ID:	Press No. 7
Superseded Permit Number:	P0117474
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) The facility-wide emissions of volatile organic compounds (VOC) from emissions units P001, K002, K003, K004, K005, K006, K007, other de minimis air contaminant sources, as defined in OAC rule 3745-15-05, and other air contaminant sources exempt from the requirement to obtain a permit-to-install pursuant to OAC rule 3745-31-03 installed subsequent to the issuance of this permit, combined, shall not exceed 99.9 tons per year (TPY), based upon a rolling 12-month summation of the VOC emission rates from all emissions units, combined.

The permittee has existing VOC emission records and therefore does not to be limited on a monthly basis for the first year after issuance of this permit.

(2) The total allowable emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units P001, K002, K003, K004, K005, K006, K007, other de minimis air contaminant sources, as defined in OAC rule 3745-15-05, and other air contaminant sources exempt from the requirement to obtain a permit-to-install pursuant to OAC rule 3745-31-03 installed subsequent to the issuance of this permit, combined, shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

(3) The permittee shall collect and record the following information on a monthly basis for the materials applied in the emissions units identified in b)(1) above:

a. the name and identification of each coating and ink, as appropriately used on a specific emissions unit;

b. the VOC content of each coating and ink, as appropriately used on a specific emissions unit, in pounds per gallon;

c. the number of gallons of each coating and ink, as appropriately used on a specific emissions unit;

d. the total VOC emission rate from all coatings and inks, as appropriately used on a specific emissions unit, in pounds or tons, i.e., the summation of the products of “b” times “c” for all coatings and inks employed; and

e. the updated rolling, 12-month summation of the VOC emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

(4) The permittee shall collect and record the following information each month for the emissions units identified in b)(2) above:

a. the name and identification number of each HAP containing material employed;

b. the identification of each individual HAP contained in each material employed;

c. the HAP emission factor for each individual HAP and each type of operation;

d. the total individual HAP emissions for each HAP from all sources, in pounds or tons per month;

e. the total combined HAP emissions from all sources, in pounds or tons per month [the summation of the individual HAP emissions from d. above];

f. the updated rolling, 12-month summation of the individual HAP emissions for each HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and

g. The updated rolling, 12-month summation of the combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting Southwest Ohio Air Quality Agency. This information does not have to be kept on an individual emissions unit basis.

(5) The permittee shall submit quarterly deviation reports which identify any exceedance of the HAP or VOC emission limitations outlined in b)(1) and b)(2). If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June, and July through September, respectively).

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

a. Emission Limitation:

The facility-wide emissions of volatile organic compounds (VOC) shall not exceed 99.9 tons per year (TPY), based upon a rolling 12-month summation of the VOC emission rates from all emissions units, combined, identified b)(1) above.

Applicable Compliance Method:

Compliance with the VOC emission limitations in b)(1) above shall be demonstrated by the record keeping requirements specified in b)(3) above.

b. Emission Limitation:

HAP emissions shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for combined HAPs, based on a rolling, 12-month summation for the emissions units identified in b)(2) above.

Applicable Compliance Method:

Compliance with the HAP emission limitations in b)(2) above shall be demonstrated by the record keeping requirements specified in b)(4) above.

(7) The Ohio EPA has determined that this facility may be subject to U.S. EPA standards for control of hazardous air pollutants (HAP), the National Emission Standards for Hazardous Air Pollutants (NESHAP), found in the Code of Federal Regulations, Title 40 Part 63. At this time the Ohio EPA is not accepting the delegating authority to enforce NESHAP standards for area sources. The requirements of this NESHAP, that are applicable to the area source(s) (for HAP) identified in this permit, shall be enforceable by U.S. EPA. Region 5. The complete requirements of the applicable rule (including the Part 63 General Provisions) may be accessed via the Internet from the Electronic code of Federal Regulations (e-CFR) website http://www.ecfr.gov/ or by contacting the appropriate Ohio EPA District Office or Local Air Agency.

C. Emissions Unit Terms and Conditions

1. P001, Cleanup Operations

Operations, Property and/or Equipment Description:

Facility Wide Cleanup Operations

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

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

a. g)(1).

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

a. b)(1)b.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Emissions of volatile organic compounds (VOC) shall not exceed 25.02 tons per year. The requirements of this rule alsoinclude compliance with therequirements of OAC rule3745-31-05(D). See b)(2)a., b)(2)b. and b)(2)c.
b.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V	See 1.b)(1) and 1.b)(2) of Section B.

(2) Additional Terms and Conditions

a. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the VOC emission limitation.

b. The VOC content of each cleanup material shall not exceed 7.67 lbs VOC per gallon of cleanup material.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information on a monthly basis for the cleanup materials applied in this emissions unit:

a. the name and identification of each cleanup material employed;

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

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

d. the total VOC emission rate from all cleanup materials, in pounds or tons, i.e., the summation of the products of “b” times “c” for all cleanup materials employed; and

e. the updated per month the summation of the VOC emissions, in pounds or tons of d)(1)d. by adding the current month and the preceding eleven calendar months.

e) Reporting Requirements

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

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

f) Testing Requirements

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

Emission Limitation:

Emissions of volatile organic compounds (VOC) shall not exceed 25.02 tons per year.

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping requirements specified in d)(1).

Emission Limitation:

The VOC content of each cleanup material shall not exceed 7.67 lbs VOC per gallon of cleanup material.

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping requirements specified in d)(1).

g) Miscellaneous Requirements

(1) Modeling to demonstrate compliance with, the “Toxic Air Contaminant Statute”, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit’s maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified federally enforceable permit-to-install and operate prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new federally enforceable permit-to-install and operate.

2. Emissions Unit Group - Flexographic Printing Presses: K002, K003, K004, K005, K006, K007

EU ID	Operations, Property and/or Equipment Description
K002	Comco 8-color flexographic printing press w/ 4.5 kW corona treater (Press No. 2)
K003	Comco 7-color flexographic printing press w/ 5.0 kW corona treater (Press No. 3)
K004	Comco 9-color flexographic printing press w/ 4.5 kW corona treater (Press No. 4)
K005	Comco 9-color flexographic printing press w/ 4.5 kW corona treater (Press No. 5)
K006	Comco 9-color flexographic printing press w/ 4.5 kW corona treater (Press No. 6)
K007	Comco 9-color flexographic printing press w/ 4.5 kW corona treater (Press No. 7)

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

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

a. g)(1).

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

a. b)(1)b.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Emissions of volatile organic compounds (VOC) shall not exceed 2.85 lbs/hr, from each individual emissions unit (K002 through K007). The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D). See b)(2)a., b)(2)b. and b)(2)c.
b.	OAC rule 3745-31-05(D)	See 1.b)(1) and 1.b)(2) of Section B.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	Synthetic Minor to Avoid Title V	
c.	OAC rule 3745-21-09(Y)	Exempt per OAC rule 3745-21-09(Y)(2)(d). See b)(2)d.

(2) Additional Terms and Conditions

a. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the mass emission limitations and usage limitations.

b. The VOC content, as applied, of each coating employed shall not exceed 7.8lbs VOC per gallon of coating.

c. The hourly emission limitation outlined is based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with this limit.

d. This facility is exempt from the requirements of OAC rule 3745-21-09(Y)(1) because the total maximum usage of VOC in all coatings and inks employed in all flexographic, packaging rotogravure, and publication rotogravure printing lines within the facility is less than or equal to 100 tons of VOC per year.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information at the end of each month and end of each year, as applicable:

a. the company identification for each coating and ink employed in the flexographic, packaging rotogravure, and publication rotogravure printing line(s);

b. the number of gallons or pounds of each flexographic, packaging rotogravure, and publication rotogravure coating and ink employed in the printing operations during each month;

c. the VOC content of each coating and ink employed in the flexographic, packaging rotogravure, and publication rotogravure printing line(s) during the month, in pounds per gallon or percent by weight;

d. the total monthly VOC usage from each coating and ink applied in the flexographic, packaging rotogravure, and publication rotogravure printing line(s) during the month, the products of “b” times “c” above for each coating and ink applied, in pounds;

e. the per line VOC usage from all flexographic, packaging rotogravure, and publication rotogravure coatings and inks applied during the month, i.e., the summation of the VOC usage for all coatings and inks applied from “d” above, divided by 6 (the number of printing lines);

f. if demonstrating compliance with the annual coating and ink usage, the total amount of flexographic, packaging rotogravure, and publication rotogravure coatings and inks applied during the month, i.e., the summation of the pounds of each coating and ink applied from “d” above, in pounds per month;

g. for each 12 months or full year of printing operations, the annual coating and ink usage, or the annual VOC usage in all coatings and inks employed, in all of the flexographic, packaging rotogravure, and publication rotogravure printing line(s), summed at the end of each operating year, i.e., the summation of the monthly totals from “e” or “f” above, in pounds per month; and

h. at the end of each year, the facility-wide annual VOC emissions from the flexographic, packaging rotogravure, and publication rotogravure printing line(s), i.e., the summation of the 12 months of emissions from all coatings and inks (as recorded in “g” above, divided by 2,000 lbs./ton, in tons per year or rolling 12 months.

e) Reporting Requirements

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

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit. The permittee shall include any exceedance or deviation from the exemption restrictions for the usage of VOC in the coatings and inks employed in the flexographic, packaging rotogravure, and publication rotogravure printing line(s) greater than 100 tons of VOC per year.

f) Testing Requirements

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

a. Emission Limitation:

Emissions of volatile organic compounds (VOC) shall not exceed 2.85 lbs/hr, from each individual emissions unit (K002 through K007).

Applicable Compliance Method:

The hourly VOC emissions are calculated by multiplying the gallons per hour coating or ink usage times pounds per gallon VOC content of coating or ink.

b. Emission Limitation:

The VOC content, as applied, of each coating employed shall not exceed 7.8lbs VOC per gallon of coating.

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping requirements specified in d)(1).

g) Miscellaneous Requirements

(1) Modeling to demonstrate compliance with, the “Toxic Air Contaminant Statute”, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit’s maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified federally enforceable permit-to-install and operate prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new federally enforceable permit-to-install and operate.