Facility ID: 1409010838 Issuance type: Final State Permit To Operate

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

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

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

Facility ID: 1409010838 Emissions Unit ID: R008 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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

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

   (a) None.

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

   (a) None.

A. **Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Finishing Department	OAC rule 3745-31-05 (PTI 14-4234)	See Term A.2.a, A.2.b, A.2.c and A.2.d
	OAC rule 3745-21-07(G)(2)	See Term A.2.e

2. **Additional Terms and Conditions**

   (a) The organic compound (OC) emissions from this emissions unit shall not exceed 7.74 pounds per hour.
   The OC emissions from this emissions unit shall not exceed 40 pounds per day on any day when a photochemically reactive material (PRM) is employed in this emissions unit.
   The OC emissions from this emissions unit shall not exceed 5.7 tons per year as a rolling, twelve-month total.
   The allowable emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility 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 determined on a rolling, 12-month summation.
   The emissions limit specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

B. **Operational Restrictions**

1. The following operational limitations shall apply to this emissions unit:

   a. The adhesive usage shall not exceed 226,000* pounds per year as a rolling, twelve-month total.
   b. The OC content of adhesives shall not exceed 5%* by weight, as a rolling, twelve-month weighted average.

   *The usage rate and OC content limitation may be exceeded provided the annual OC emissions limit is not exceeded. However, the maximum OC content of adhesives shall not exceed 30% by weight.

C. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall maintain monthly records which list the following information for this emissions unit:

   a. The company identification of each adhesive.
   b. The amount of each adhesive employed, in pounds.
   c. The weight percent OC content of each adhesive.
   d. The monthly-weighted average OC content (in percent by wt.) of all adhesives.
   e. The monthly OC emissions, in pounds or tons, from this emissions unit.
   f. The rolling, twelve-month total usage for adhesive, in pounds per year.
   g. The rolling, twelve-month weighted average OC content (in percent by wt.) for adhesives.
   h. The rolling, twelve-month total OC emissions, in tons per year.

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

   a. The company identification for each adhesive and photochemically reactive cleanup material employed.

   b. The number of gallons of each adhesive and photochemically reactive cleanup material employed.

   c. The OC content of each adhesive and photochemically reactive cleanup material, in pounds per gallon.

   d. For each day during which a photochemically reactive material is employed, the total OC emission rate for all

adhesives and photochemically reactive cleanup materials, in pounds per day.

e. For each day during which a photochemically reactive material is employed, the total number of hours the emissions unit was in operation.

f. For each day during which a photochemically reactive material is employed, the average hourly OC emission rate for all adhesives and photochemically reactive cleanup materials, i.e., (d)/(e), in pounds per hour (average).

3. The permittee shall collect and record the following information each month for all emissions units at the facility:

a. The name and identification number of each ink, coating, fountain solution, cleanup material and adhesive.
b. The individual HAP content for each HAP of each ink, coating, fountain solution, cleanup material and adhesive, in weight percent of individual HAP.
c. The total combined HAP content of each ink, coating, fountain solution, cleanup material and adhesive, in weight percent of combined HAPs (the sum of all the individual HAP contents from (b)).
d. The number of pounds of each ink, coating, fountain solution, cleanup material and adhesive employed.
e. The total individual HAP emissions for each HAP from all inks, coatings, fountain solutions, cleanup materials and adhesives employed, in pounds or tons per month (for each HAP, the sum of (b) times (d) for each ink, coating, fountain solution, cleanup material and adhesive).
f. The total combined HAP emissions from all inks, coatings, fountain solutions, cleanup materials and adhesives employed, in pounds or tons per month (the sum of (c) times (d) for each ink, coating, fountain solution, cleanup material and adhesive).
g. The rolling, twelve-month total individual HAP emissions for each HAP from all inks, coatings, fountain solutions, cleanup materials and adhesives employed, in pounds or tons.
h. The rolling, twelve-month total combined HAPs from all inks, coatings, fountain solutions, cleanup materials and adhesives employed, in pounds or tons.

A listing of the Hazardous Air Pollutants (HAPS) can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on an emissions unit - by - emission unit basis.

D. **Reporting Requirements**

1. The permittee shall submit semi-annual reports which include the following information:

a. The rolling, twelve-month total usage for adhesives in pounds per year, for each month.
b. The rolling, twelve-month weighted average OC content (in percent by wt.) for adhesives, for each month.
c. The rolling, twelve-month total OC emissions in tons per year, for each month.

These reports shall be submitted by August 15 and February 15 of each year and shall cover the previous six calendar months (January to June and July to December, respectively).

2. The permittee shall notify the Director of any daily or monthly record showing that this emissions unit has exceeded the emission limitations and/or the operational limitations outlined in this permit. A copy of such record shall be sent to the Director within 30 days after the exceedance occurs.

3. The permittee shall notify the Director of any exceedance of the HAP emissions limitations set forth in this permit. The permittee shall submit annual reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance. The annual reports also shall specify the single HAP and combined HAP emissions for the previous calendar year. These reports shall be submitted by January 31 of each year. If no exceedances occurred during the reporting period, then a report is required stating so.

E. **Testing Requirements**

1. Formulation data or USEPA method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the OC contents of the adhesives.

2. Compliance with the usage and emission limitations outlined in this permit shall be demonstrated by the record keeping requirements outlined in Term C.1, C.2 and C.3.

F. **Miscellaneous Requirements**

1. None