Facility ID: 1409030626 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: 1409030626 Emissions Unit ID: K018 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
7-Head flexographic printing press (Press C-13)	OAC 3745-31-05 (PTI 14-4339)	See A.2.a and A.2.c.
	OAC 3745-21-09(Y)(1)(a)	See A.2.b.
	40 CFR Part 60, Subpart RR.	The emissions limit based on this applicable rule is less stringent than the limit based on OAC rule 3745-31-05.

2. **Additional Terms and Conditions**

   (a) The combined volatile organic compounds (VOC) emissions from emissions units K002, K003, K005, K006, K007, K010, K012, K013, K014, K015, K016, K017 and K018 shall not exceed 15.7 tons per year as a rolling, 12-month summation.
   The VOC content of each coating and each ink employed in emissions units K002, K003, K005, K006, K007, K010, K012, K013, K014, K015, K016, K017 and K018 shall not exceed the following:

   i. forty per cent VOC by volume of the coating and inks, excluding water; or
   ii. twenty-five per cent VOC by volume of the volatile matter in the coating and ink.
   The following VOC content limitations shall apply to all materials employed in emissions units K002, K003, K005, K006, K007, K010, K012, K013, K014, K015, K016, K017 and K018:

   i. The VOC content of each ink shall not exceed 0.5 pound per gallon.
   ii. The VOC content of each coating shall not exceed 0.5 pound per gallon.
   iii. The VOC content of each water based thinner shall not exceed 0.5 pound per gallon.
   iv. The VOC content of each solvent based thinner shall not exceed 8.5 pounds per gallon.
   v.* The VOC content of each water based adhesive, employed in emissions unit K006 and K016, shall not exceed 0.25 pound per gallon.
   vi. The VOC emissions from the hot melt adhesive, employed in emissions unit K012 and K018, shall not exceed 0.6 pound per gallon.
   vii. The VOC content of each liquid organic cleanup material shall not exceed 6.5 pounds per gallon.

   *These limitations do not apply to this emissions unit. These have been included to quantify the total annual VOC emissions from emissions units K002, K003, K005, K006, K007, K010, K012, K013, K014, K015, K016, K017 and K018.

B. **Operational Restrictions**

1. The total annual ink usage in emissions units K002, K003, K005, K006, K007, K010, K012, K013, K014, K015, K016, K017 and K018 combined shall not exceed 11,680 gallons per year as a rolling, 12-month summation.

2. The total annual coating usage in emissions units K002, K003, K005, K006, K007, K010, K012, K013, K014, K015, K016, K017 and K018 combined shall not exceed 7,560 gallons per year as a rolling, 12-month summation.

3. The total annual water based thinner usage in emissions units K002, K003, K005, K006, K007, K010, K012, K013, K014, K015, K016, K017 and K018 combined shall not exceed 816 gallons per year as a rolling, 12-month summation.

4. The total annual solvent based thinner usage in emissions units K002, K003, K005, K006, K007, K010, K012, K013, K014, K015, K016, K017 and K018 combined shall not exceed 600 gallons per year as a rolling, 12-

month summation.

5. The total annual liquid organic cleanup material usage in emissions units K002, K003, K005, K006, K007, K010, K012, K013, K014, K015, K016, K017 and K018 combined shall not exceed 214 gallons per year as a rolling, 12-month summation.

6. The total annual water based adhesive usage in emissions units K006 and K016 combined shall not exceed 4,672 gallons per year as a rolling, 12-month summation.

   This limitation does not apply to this emissions unit. This has been included to quantify the total annual VOC emissions from emissions units K002, K003, K005, K006, K007, K010, K012, K013, K014, K015, K016, K017 and K018.

7. The total annual hot melt adhesive usage in emissions units K012 and K018 combined shall not exceed 22,813 gallons per year as a rolling, 12-month summation.

8. The permittee shall not employ pressure sensitive adhesive in emissions units K002, K003, K005, K006, K007, K010, K013, K014, K015, K016 and K017.

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

1. The permittee shall maintain the following monthly records for emissions units K002, K003, K005, K006, K007, K010, K012, K013, K014, K015, K016, K017 and K018:

   a. The company identification for each ink, coating, water based thinner, solvent based thinner, water based adhesive, hot melt adhesive and organic cleanup material employed.
   b. The number of gallons of each ink, coating, water based thinner, solvent based thinner, water based adhesive, hot melt adhesive and organic cleanup material employed.
   c. The VOC content of each ink, coating, water based thinner, solvent based thinner, water based adhesive, hot melt adhesive and organic cleanup material employed, in pounds per gallon.
   d. The VOC content of each ink and coating in per cent VOC by volume of the coating or inks, excluding water.
   e. The VOC content of each ink and coating in per cent VOC by volume of the volatile matter in the coating or ink.
   f. The total VOC emission rate for all inks, coatings, water based thinners, solvent based thinners, water based adhesives, hot melt adhesives and organic cleanup materials employed, in pounds or tons per month (calculated by taking the sum of (b) times (c) for each ink, coating, water based thinner, solvent based thinner, water based adhesive, hot melt adhesive and organic cleanup material employed).
   g. The rolling, 12-month total usage for each ink, coating, water based thinner, solvent based thinner, water based adhesive, hot melt adhesive and organic cleanup material employed, calculated by adding the current month's usage to the usage for the preceding eleven calender months for each ink, coating, water based thinner, solvent based thinner, water based adhesive, hot melt adhesive and organic cleanup material employed..
   h. The rolling, 12-month summation of the VOC emissions, in tons per year, calculated by adding the current month's VOC emissions to the VOC emissions for the preceding eleven calender months.

D. **Reporting Requirements**

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing an exceedance of the rolling, 12-month VOC emission limit, the VOC content limits, and/or the usage limits. The notification shall include a copy of each such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

2. The permittee shall also submit annual reports which summarize the rolling, 12-month VOC emissions total and material usages in this emissions unit for each calender month during the previous calender year. These reports shall be submitted by January 31 of each year and shall cover the previous calender year.

E. **Testing Requirements**

1. USEPA Methods 24 and 24A shall be used to determine the OC content for (a) coatings and (b) flexographic and rotogravure printing lines and related coatings, respectively. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

2. Compliance with the VOC emission limit, the VOC content limits, and the usage limits shall be determined by the record keeping in C.1.

F. **Miscellaneous Requirements**

None