

Facility ID: 1431190717 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

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: 1431190717 Emissions Unit ID: K001 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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5 - color flexographic press	OAC 3745-31-05 (PTI 14-2104)	0.93 lb VOC/hr and 4.07 TPY VOC.  The hourly VOC emissions limit is based on the VOC content limits and the maximum production capacity of the press; therefore, no record keeping, reporting or testing is required to demonstrate compliance with this limit.
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See A.2.  
Less stringent than the VOC content limits in A.2.

OAC 3745-21-09(Y)(1)(a)

2. **Additional Terms and Conditions**
  - (a) The VOC content of each ink employed in this emissions unit, shall not exceed 5% by volume, as applied and 9.42% by volume, as applied, excluding water and exempt solvents.  
The VOC content of each lacquer coating employed shall not exceed 8% by volume, as applied and 15.8% by volume, as applied, excluding water and exempt solvents.

**B. Operational Restrictions**

None

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

1. The permittee shall maintain monthly records of the following:
  - a. The company identification of each ink and lacquer coating employed;
  - b. The number of gallons of each ink and lacquer coating employed;
  - c. The VOC content of each ink and lacquer coating employed, as applied, in percent by volume; and
  - d. The VOC content of each ink and lacquer coating employed, as applied, in percent by volume, excluding water and exempt solvents.
2. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions:
  - a. The name and identification of each ink and lacquer coating employed.
  - b. The number of gallons of each ink and lacquer coating employed.
  - c. The VOC content of each ink and lacquer coating employed, as applied, in pounds per gallon.
  - d. The total VOC emissions from this emissions unit, i.e., the sum of (b)(c) for all inks and lacquer coatings employed divided by 2000, in tons per year.

(This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to specific "gallons/year" and "tons/year" limitations, or just a "tons/year" limitation in a Permit to Install. In such cases, for each such new emissions unit only, the above-mentioned information must

be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

**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 the use of noncomplying coatings. The notification shall include a copy of 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 specify the annual VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

**E. Testing Requirements**

1. USEPA Methods 24 and 24A shall be used to determine the VOC 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 content limits shall be demonstrated by the record keeping requirements in C.1.
3. Compliance with the annual VOC emissions limit shall be demonstrated by the record keeping requirements in C.2.

**F. Miscellaneous Requirements**

None