Facility ID: 1431420497 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: 1431420497 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
flexographic press #1	OAC rule 3745-31-05 See F.1.	The total volatile organic compound (VOC) emissions from all coatings, inks, and cleanup materials employed at this facility shall not exceed 8 tons/month; 96 tons/year. (Compliance with the annual emission limitation shall be determined using a rolling, 12-month summation.)
	OAC rule 3745-21-09(Y)(1)(a) See F.1.	The VOC content of the coatings and inks employed in this emissions unit shall not exceed either 40 percent of the coating and ink, by volume, excluding water, or 25 percent, by volume, of the volatile matter in the coating and ink. See A.2.a below.

2. **Additional Terms and Conditions**

   (a) Compliance with the VOC content requirements specified in OAC rule 3745-21-09(Y)(1)(a) would normally be determined based upon a volume-weighted average of all coatings and inks employed in this emissions unit in any one day. However, because all of the coatings and inks employed in this emissions unit currently comply with the VOC content requirements, the record keeping requirements have been changed from daily to monthly. If coatings and inks are employed in this emissions unit which do not comply with the VOC content requirements, the permittee shall maintain the records required in Section C.1. on a daily basis.

B. **Operational Restrictions**

1. The combined coating and ink usage for this facility shall not exceed 13,333 gallons per month and 160,000 gallons per year.

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

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

   a. the company identification for each coating, ink, and cleanup material employed;

   b. the number of gallons of each coating, ink, and cleanup material employed;

   c. the VOC content of each coating and ink employed, in percent of coating or ink by volume (excluding water) or percent by volume of the volatile content;

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

   e. the total VOC emissions from each coating, ink, and cleanup material employed at this facility, i.e., (b)(d) (ton/2000 lbs), in tons of VOC per month;

   f. the total VOC emissions from all coatings, inks, and cleanup materials employed at this facility, i.e., the sum of (e) for all coatings, inks, and cleanup materials, in tons of VOC per month; and

g. the total number of gallons of all coatings and inks employed at this facility.

D. **Reporting Requirements**

1. The permittee shall submit a copy of any monthly record which shows an exceedance of:

   a. the facility VOC emission limit;

   b. the VOC content of each coating and ink employed, in percent of coating or ink by volume (excluding water) or percent by volume of the volatile content; and/or

   c. the combined coating and ink usage limit.

   A copy of each such record shall be submitted within 45 days after the exceedance occurs.

2. The permittee shall also submit annual reports which specify the total VOC emissions and combined coating and ink usage for this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. **Testing Requirements**

1. Compliance with the monthly VOC emission limit in Section A.1. of this permit shall be determined by the record keeping requirements outlined in Section C.1. of this permit.

2. Compliance with the annual VOC emission limit in Section A.1. of this permit shall be determined by totalling the monthly emissions generated in Section C.1. of this permit.

3. Compliance with the VOC content limit in Section A.1. of this permit shall be demonstrated by the record keeping requirements outlined in Section C.1. of this permit.

4. USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks 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.

F. **Miscellaneous Requirements**

1. The following terms and conditions shall supersede all the air pollution control requirements for this emissions unit contained in permit to install number 14-1379 as issued on April 26, 1989:

   Part II, Special Terms and Conditions, A-D.