

Facility ID: 1576130147 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.

- [Go to Part II for Emissions Unit K003](#)
- [Go to Part II for Emissions Unit K004](#)
- [Go to Part II for Emissions Unit K005](#)
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Facility ID: 1576130147 Emissions Unit ID: K003 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>
K003 - Flexographic printing press; C-1 Flexo	OAC rule 3745-35-07(B) PTI 15-01431	The combined emissions of organic compounds from presses K003, K004, K005, P001, P002, & P003 shall not exceed 87.8 tons per year. This limitation shall be achieved by limiting the organic solvent usage rate to 87.8 tons per year based upon a rolling, 12-month summation of the monthly emissions. (See section II.A.2.a. below.)
	OAC rule 3745-21-09(Y)	Facility emission limitations: 9.9 tons of any individual HAP per rolling, 12-month period (See section II.A.2.b. below.) 24.9 tons of total HAPs per rolling, 12-month period (See section II.A.2.b. below.) This emissions unit is exempt from the requirements of this rule because the coating and ink usage at this facility in all flexographic, packaging rotogravure and publication rotogravure printing lines is less than or equal to one hundred forty-eight tons per year.

**2. Additional Terms and Conditions**

- (a) Organic solvent usage shall include the organic solvent found in the inks as employed, the makeup organic solvent added to the inks and any cleanup organic solvents employed. Historical reports, submitted by the permittee since January of 1997, have shown that this facility is in compliance with this limit.  
The emissions [as defined by OAC rule 3745-77-01 (BB) of hazardous air pollutants (HAPs)] from all emissions units at this facility, as identified in Section 112(b) of Title III of the Clean Air Act, shall not exceed 9.9 tons per rolling, 12-month period for any single HAP and 24.9 tons per rolling, 12-month period for any combination of HAPs. Historical reports, submitted by the permittee since January of 1997, have shown that this facility is in compliance with these limits.

**B. Operational Restrictions**

1. None

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

1. The permittee shall collect and record the following information each month in order to determine whether the combined organic solvent usage limits for presses K003, K004, K005, P001, P002, & P003 are being met:
  - a. the total monthly organic solvent usage rate from presses K003, K004, K005, P001, P002, & P003;

- b. the rolling, 12-month organic solvent usage rate from presses K003, K004, K005, P001, P002, & P003;
  - c. the total individual HAP emissions for each HAP from all coatings, inks and cleanup materials employed in presses K003, K004, K005, P001, P002, & P003, in pounds or tons per month and pounds or tons per rolling, 12-month period; and
  - d. the total combined HAP emissions from all coatings, inks and cleanup materials employed in presses K003, K004, K005, P001, P002, & P003, in pounds or tons per month and pounds or tons per rolling, 12-month period.
- 2. The permittee shall collect and record the following information, on a monthly basis, for the purpose of determining annual organic compound emissions from this emissions unit:
  - a. the company identification of each cleanup material employed;
  - b. the number of gallons of each cleanup material employed;
  - c. the organic compound content of each cleanup material, in pounds per gallon;
  - d. the total organic compound emission rate for all cleanup materials, in pounds;
  - e. the company identification of each ink employed;
  - f. the number of gallons of each ink employed;
  - g. the organic compound content of each ink, in pounds per gallon; and
  - h. the total organic compound emission rate for all inks, in pounds.
- D. **Reporting Requirements**
  - 1. The permittee shall submit deviation (excursion) reports which include the following information:
    - a. an identification of all exceedances of the rolling, 12-month organic solvent usage limitation of 87.8 tons from presses K003, K004, K005, P001, P002, & P003;
    - b. an identification of any rolling, 12-month period in which an individual HAP emissions exceeded 9.9 tons or the combined HAPs emissions exceeded 24.9 tons from all emissions units at this facility and the HAP emission rate for such period; and
    - c. an identification of any year in which the annual ink and coating usage exceeds a total of 148 tons from all flexographic, packaging rotogravure and publication rotogravure printing lines at this facility. This ink usage shall include any initial thinning solvents, including water, used to make the press ink ready. It shall not include any solvents used to maintain viscosity.
  - 2. The permittee shall submit annual reports by February 1 of each year showing the total organic compound emissions from this emissions unit for the previous calendar year.
- E. **Testing Requirements**
  - 1. Compliance with the emission limitation(s) in the Air Emissions Summary and Section A of these terms and conditions shall be determined in accordance with the following methods:
    - Emission Limitation  
The total combined emissions of organic compounds from presses K003, K004, K005, P001, P002, & P003 shall not exceed 87.8 tons per year.
    - Applicable Compliance Method  
Monthly record keeping as required by section II.C.2.
    - Emission Limitation  
The emissions [as defined by OAC rule 3745-77-01 (BB) of hazardous air pollutants (HAPs)] from all emissions units at this facility, as identified in Section 112(b) of Title III of the Clean Air Act, shall not exceed 9.9 tons per rolling, 12-month period for any single HAP and 24.9 tons per rolling, 12-month period for any combination of HAPs.
    - Applicable Compliance Method  
Monthly record keeping as required by section II.C.1.
- F. **Miscellaneous Requirements**
  - 1. None

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Facility ID: 1576130147 Emissions Unit ID: K004 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>
K004 - Lithographic printing press; Harris C-5	OAC rule 3745-31-05(A)(3) PTI 15-01431	This emissions unit shall only employ water-based inks. (Water-based inks shall be defined as inks whose solvent content is at least 75% water.)  30 pounds OC/hour (See section II.A.2.c. below.) 3.165 tons OC/month 38 tons OC/year
	OAC rule 3745-35-07(B) PTI 15-01431	The combined emissions of organic compounds from presses K003, K004, K005, P001, P002, & P003 shall not exceed 87.8 tons per year. This limitation shall be achieved by limiting the organic solvent usage rate to 87.8 tons per year based upon a rolling, 12-month summation of the monthly organic solvent usage figures (See section II.A.2.a. below.)  Facility emission limitations: 9.9 tons of any individual HAP per rolling, 12-month period. (See section II.A.2.b. below.) 24.9 tons of total HAPs per rolling, 12-month period. (See section II.A.2.b. below.)
	OAC rule 3745-21-07 (G)(2)	(See section II.A.2.d. below.)

**2. Additional Terms and Conditions**

- (a) Organic solvent usage shall include the organic solvent found in the inks as employed, the makeup organic solvent added to the inks and any cleanup organic solvents employed. Historical reports, submitted by the permittee since January of 1997, have shown that this facility is in compliance with this limit.  
The emissions [as defined by OAC rule 3745-77-01 (BB) of hazardous air pollutants (HAPs)] from all emissions units at this facility, as identified in Section 112(b) of Title III of the Clean Air Act, shall not exceed 9.9 tons per rolling, 12-month period for any single HAP and 24.9 tons per rolling, 12-month period for any combination of HAPs. Historical reports, submitted by the permittee since January of 1997, have shown that this facility is in compliance with these limits.  
The hourly OC emission limit of 30 lbs/hr represents the maximum potential to emit of this emissions unit; so, no recordkeeping will be required to verify compliance.  
This emissions unit shall not employ inks or cleanup solvents which are photochemically reactive materials as defined by OAC rule 3745-21-01 (C)(5). This determination shall be based on the actual formulation of the inks or cleanup solvents after in-plant reducing or thinning and prior to application/use of the product. Prior to employing any inks or cleanup solvents which are photochemically reactive materials, the permittee shall provide written notification to, and obtain approval from the Canton local air agency. Such notification shall include information sufficient to determine that the emissions with the proposed change in materials will comply with the emission limits and/or control requirements as defined in OAC rule 3745-21-07(G)(2). This notification, at a minimum, shall include the company identification of the new material to be employed, the solvent composition of the material, and the maximum amount to be used, in pounds per hour.

**B. Operational Restrictions**

- 1. None

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

- 1. The permittee shall collect and record the following information each month for the printing operation:
  - a. the company identification for each cleanup material employed;
  - b. documentation on whether or not each cleanup material is a photochemically reactive material; and
  - c. the number of gallons of any photochemically reactive cleanup solvent employed.

[Note: The definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]
- 2. The permittee shall collect and record the following information each month for each ink employed in this emissions unit:
  - a. the percentage of the solvent in the ink which is water;
  - b. whether the ink contains photochemically reactive materials (PRM) as defined in OAC 3745-21-01(C)(5); and

c. the gallons of ink employed which contained any PRM.

3. The permittee shall collect and record the following information each month in order to determine whether the combined organic solvent usage limits for presses K003, K004, K005, P001, P002, & P003 are being met:
  - a. the total monthly organic solvent usage rate from presses K003, K004, K005, P001, P002, & P003;
  - b. the rolling, 12-month organic solvent usage rate from presses K003, K004, K005, P001, P002, & P003;
  - c. the total individual HAP emissions for each HAP from all coatings, inks, and cleanup materials employed in presses K003, K004, K005, P001, P002, & P003, in pounds or tons per month and pounds or tons per rolling, 12-month period; and
  - d. the total combined HAP emissions from all coatings, inks, and cleanup materials employed in presses K003, K004, K005, P001, P002, & P003, in pounds or tons per month and pounds or tons per rolling, 12-month period.
4. The permittee shall collect and record the following information, on a monthly basis, for the purpose of determining annual organic compound emissions from this emissions unit:
  - a. the company identification of each cleanup material employed;
  - b. the number of gallons of each cleanup material employed;
  - c. the organic compound content of each cleanup material, in pounds per gallon;
  - d. the total organic compound emission rate for all cleanup materials, in pounds;
  - e. the company identification of each ink employed;
  - f. the number of gallons of each ink employed;
  - g. the organic compound content of each ink, in pounds per gallon;
  - h. the total organic compound emission rate for all inks, in pounds;
  - i. the company identification of each makeup organic solvent employed;
  - j. the number of gallons of each makeup organic solvent employed; and
  - k. the total organic compound emission rate for all makeup organic solvents, in pounds.

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. an identification of all exceedances of the rolling, 12-month usage limitation of 87.8 tons for organic solvent from presses K003, K004, K005, P001, P002, & P003;
  - b. an identification of any inks employed which are not water-based and the quantity of such ink usage;
  - c. an identification of any inks employed which are photochemically reactive materials and the quantity of such ink usage;
  - d. an identification of any cleanup materials employed which contain photochemically reactive materials and the quantity of such cleanup materials employed;
  - e. an identification of any rolling, 12-month period in which an individual HAP emissions exceeded 9.9 tons or the combined HAPs emissions exceeded 24.9 tons from all emissions units at this facility and the HAP emission rate for such periods; and
  - f. an identification of any month in which the OC emissions exceeded 3.165 tons.
2. The permittee shall submit annual reports by February 1 of each year showing the total organic compound emissions from this emissions unit for the previous calendar year.

**E. Testing Requirements**

1. Compliance with the emission limitation(s) in the Air Emissions Summary and Section A of these terms and conditions shall be determined in accordance with the following methods:
 

**Emission Limitation**  
The total combined emissions of organic compounds from presses K003, K004, K005, P001, P002, & P003 shall not exceed 87.8 tons per year.

**Applicable Compliance Method**  
Monthly record keeping of organic solvent usage as required by section II.C.3.

**Emission Limitation**  
The emissions [as defined by OAC rule 3745-77-01 (BB) of hazardous air pollutants (HAPs)] from all emissions units at this facility, as identified in Section 112(b) of Title III of the Clean Air Act, shall not exceed 9.9 tons per rolling, 12-month period for any single HAP and 24.9 tons per rolling, 12-month period for any combination of HAPs.

**Applicable Compliance Method**  
Monthly record keeping as required by section II.C.3.

**Emission Limitation**  
This emissions unit shall only employ water-based inks. (Water-based inks shall be defined as inks whose solvent content is at least 75% water.)

**Applicable Compliance Method**

Monthly record keeping as required by section II.C.2.  
 Emission Limitation  
 3.165 tons OC/month and 38 tons OC/year

Applicable Compliance Method  
 Monthly record keeping as required by section II.C.4.  
 Emission Limitation  
 30 pounds OC/hour

Applicable Compliance Method  
 30 pounds OC/hour represents the maximum potential to emit for this emissions unit; so, no hourly record keeping is required.

**F. Miscellaneous Requirements**

1. Pursuant to Engineering Guide #69, modeling to demonstrate compliance with the Ohio EPA's Air Toxic Policy did not apply since the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install 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 result in an increase in emissions of any pollutant that has a listed TLV to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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Facility ID: 1576130147 Emissions Unit ID: K005 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>
K005 - Lithographic printing press; Harris C-6	OAC rule 3745-31-05(A)(3) PTI 15-01431	This emissions unit shall only employ water-based inks. (Water-based inks shall be defined as inks whose solvent content is at least 75% water.)  30 pounds OC/hour (See section II.A.2.c. below.) 3.165 tons OC/month 38 tons OC/year
	OAC rule 3745-35-07(B) PTI 15-01431	The combined emissions of organic compounds from presses K003, K004, K005, P001, P002, & P003 shall not exceed 87.8 tons per year. This limitation shall be achieved by limiting the organic solvent usage rate to 87.8 tons per year based upon a rolling, 12-month summation of the monthly organic solvent usage figures (See section II.A.2.a. below.)  Facility emission limitations: 9.9 tons of any individual HAP per rolling, 12-month period. (See section II.A.2.b. below.) 24.9 tons of total HAPs per rolling, 12-month period. (See section II.A.2.b. below.)
	OAC rule 3745-21-07 (G)(2)	(See section II.A.2.d. below.)

**2. Additional Terms and Conditions**

- (a) Organic solvent usage shall include the organic solvent found in the inks as employed, the makeup organic solvent added to the inks and any cleanup organic solvents employed. Historical reports,

submitted by the permittee since January of 1997, have shown that this facility is in compliance with this limit.

The emissions [as defined by OAC rule 3745-77-01 (BB) of hazardous air pollutants (HAPs)] from all emissions units at this facility, as identified in Section 112(b) of Title III of the Clean Air Act, shall not exceed 9.9 tons per rolling, 12-month period for any single HAP and 24.9 tons per rolling, 12-month period for any combination of HAPs. Historical reports, submitted by the permittee since January of 1997, have shown that this facility is in compliance with these limits.

The hourly OC emission limit of 30 lbs/hr represents the maximum potential to emit of this emissions unit; so, no recordkeeping will be required to verify compliance.

This emissions unit shall not employ inks or cleanup solvents which are photochemically reactive materials as defined by OAC rule 3745-21-01 (C)(5). This determination shall be based on the actual formulation of the inks or cleanup solvents after in-plant reducing or thinning and prior to application/use of the product. Prior to employing any inks or cleanup solvents which are photochemically reactive materials, the permittee shall provide written notification to, and obtain approval from the Canton local air agency. Such notification shall include information sufficient to determine that the emissions with the proposed change in materials will comply with the emission limits and/or control requirements as defined in OAC rule 3745-21-07(G)(2). This notification, at a minimum, shall include the company identification of the new material to be employed, the solvent composition of the material, and the maximum amount to be used, in pounds per hour.

**B. Operational Restrictions**

1. None

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

1. The permittee shall collect and record the following information each month for the printing operation:
  - a. the company identification for each cleanup material employed;
  - b. documentation on whether or not each cleanup material is a photochemically reactive material; and
  - c. the number of gallons of any photochemically reactive cleanup solvent employed.

[Note: The definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]
2. The permittee shall collect and record the following information each month for each ink employed in this emissions unit:
  - a. the percentage of the solvent in the ink which is water;
  - b. whether the ink contains photochemically reactive materials (PRM) as defined in OAC 3745-21-01(C)(5); and
  - c. the gallons of ink employed which contained any PRM.
3. The permittee shall collect and record the following information each month in order to determine whether the combined organic solvent usage limits for presses K003, K004, K005, P001, P002, & P003 are being met:
  - a. the total monthly organic solvent usage rate from presses K003, K004, K005, P001, P002, & P003;
  - b. the rolling, 12-month organic solvent usage rate from presses K003, K004, K005, P001, P002, & P003;
  - c. the total individual HAP emissions for each HAP from all coatings, inks, and cleanup materials employed in presses K003, K004, K005, P001, P002, & P003, in pounds or tons per month and pounds or tons per rolling, 12-month period; and
  - d. the total combined HAP emissions from all coatings, inks, and cleanup materials employed in presses K003, K004, K005, P001, P002, & P003, in pounds or tons per month and pounds or tons per rolling, 12-month period.
4. The permittee shall collect and record the following information, on a monthly basis, for the purpose of determining annual organic compound emissions from this emissions unit:
  - a. the company identification of each cleanup material employed;
  - b. the number of gallons of each cleanup material employed;
  - c. the organic compound content of each cleanup material, in pounds per gallon;
  - d. the total organic compound emission rate for all cleanup materials, in pounds;
  - e. the company identification of each ink employed;
  - f. the number of gallons of each ink employed;
  - g. the organic compound content of each ink, in pounds per gallon;
  - h. the total organic compound emission rate for all inks, in pounds;
  - i. the company identification of each makeup organic solvent employed;
  - j. the number of gallons of each makeup organic solvent employed; and
  - k. the total organic compound emission rate for all makeup organic solvents, in pounds.

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which include the following information:

- a. an identification of all exceedances of the rolling, 12-month usage limitation of 87.8 tons for organic solvent from presses K003, K004, K005, P001, P002, & P003;
  - b. an identification of any inks employed which are not water-based and the quantity of such ink usage;
  - c. an identification of any inks employed which are photochemically reactive materials and the quantity of such ink usage;
  - d. an identification of any cleanup materials employed which contain photochemically reactive materials and the quantity of such cleanup materials employed;
  - e. an identification of any rolling, 12-month period in which an individual HAP emissions exceeded 9.9 tons or the combined HAPs emissions exceeded 24.9 tons from all emissions units at this facility and the HAP emission rate for such periods; and
  - f. an identification of any month in which the OC emissions exceeded 3.165 tons.
2. The permittee shall submit annual reports by February 1 of each year showing the total organic compound emissions from this emissions unit for the previous calendar year.

**E. Testing Requirements**

1. Compliance with the emission limitation(s) in the Air Emissions Summary and Section A of these terms and conditions shall be determined in accordance with the following methods:
 

**Emission Limitation**  
The total combined emissions of organic compounds from presses K003, K004, K005, P001, P002, & P003 shall not exceed 87.8 tons per year.

**Applicable Compliance Method**  
Monthly record keeping of organic solvent usage as required by section II.C.3.

**Emission Limitation**  
The emissions [as defined by OAC rule 3745-77-01 (BB) of hazardous air pollutants (HAPs)] from all emissions units at this facility, as identified in Section 112(b) of Title III of the Clean Air Act, shall not exceed 9.9 tons per rolling, 12-month period for any single HAP and 24.9 tons per rolling, 12-month period for any combination of HAPs.

**Applicable Compliance Method**  
Monthly record keeping as required by section II.C.3.

**Emission Limitation**  
This emissions unit shall only employ water-based inks. (Water-based inks shall be defined as inks whose solvent content is at least 75% water.)

**Applicable Compliance Method**  
Monthly record keeping as required by section II.C.2.

**Emission Limitation**  
3.165 tons OC/month and 38 tons OC/year

**Applicable Compliance Method**  
Monthly record keeping as required by section II.C.4.

**Emission Limitation**  
30 pounds OC/hour

**Applicable Compliance Method**  
30 pounds OC/hour represents the maximum potential to emit for this emissions unit; so, no hourly record keeping is required.

**F. Miscellaneous Requirements**

1. Pursuant to Engineering Guide #69, modeling to demonstrate compliance with the Ohio EPA's Air Toxic Policy did not apply since the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install 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 result in an increase in emissions of any pollutant that has a listed TLV to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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**Facility ID: 1576130147 Emissions Unit ID: P001 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>
P001 - Silk screen printing press; S-8	OAC rule 3745-35-07(B) PTI 15-01431	The combined emissions of organic compounds from presses K003, K004, K005, P001, P002, & P003 shall not exceed 87.8 tons per year. This limitation shall be achieved by limiting the organic solvent usage rate to 87.8 tons per year based upon a rolling, 12-month summation of the monthly organic solvent usage figure. (See section II.A.2.a. below.)
	OAC rule 3745-21-07(G)(2)	Facility emission limitations: 9.9 tons of any individual HAP per rolling, 12-month period (See section II.A.2.b. below.) 24.9 tons of total HAPs per rolling, 12-month period (See section II.A.2.b. below.) See section II.A.2.c. below.

**2. Additional Terms and Conditions**

- (a) Organic solvent usage shall include the organic solvent found in the inks as employed, the makeup organic solvent added to the coatings and any cleanup organic solvents employed. Historical reports, submitted by the permittee since January of 1997, have shown that this facility is in compliance with this limit.  
The emissions [as defined by OAC rule 3745-77-01 (BB) of hazardous air pollutants (HAPs)] from all emissions units at this facility, as identified in Section 112(b) of Title III of the Clean Air Act, shall not exceed 9.9 tons per rolling, 12-month period for any single HAP and 24.9 tons per rolling, 12-month period for any combination of HAPs. Historical reports, submitted by the permittee since January of 1997, have shown that this facility is in compliance with these limits.  
This emissions unit shall not employ inks which are photochemically reactive materials as defined by OAC rule 3745-21-01 (C)(5). This determination shall be based on the actual formulation of the inks after in-plant reducing or thinning and prior to application of the product. Prior to employing any inks which are photochemically reactive materials, the permittee shall provide written notification to, and obtain approval from the Canton local air agency. Such notification shall include information sufficient to determine that the emissions with the proposed change in materials will comply with the emission limits and/or control requirements as defined in OAC rule 3745-21-07(G)(2). This notification, at a minimum, shall include the company identification of the new material to be employed, the solvent composition of the material, and the maximum amount to be used, in pounds per hour.

**B. Operational Restrictions**

1. None

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

1. The permittee shall collect and record the following information each month in order to determine whether the combined emission limits for presses K003, K004, K005, P001, P002, & P003 are being met:
- the total monthly organic solvent usage rate for presses K003, K004, K005, P001, P002, & P003;
  - the rolling, 12-month organic solvent usage rate for presses K003, K004, K005, P001, P002, & P003;
  - the total individual HAP emissions for each HAP from all coatings, inks and cleanup materials employed in presses K003, K004, K005, P001, P002, & P003, in pounds or tons per month and pounds or tons per rolling, 12-month period; and
  - the total combined HAP emissions from all coatings, inks and cleanup materials employed in presses K003, K004, K005, P001, P002, & P003, in pounds or tons per month and pounds or tons per rolling, 12-month period.
2. The permittee shall collect and record the following information, on a monthly basis, for the purpose of determining annual organic compound emissions from this emissions unit:
- the company identification of each cleanup material employed;
  - whether or not each cleanup material is a photochemically reactive material;
  - the number of gallons of each cleanup material employed;
  - the organic compound content of each cleanup material, in pounds per gallon;
  - the total organic compound emission rate for all cleanup materials, in pounds;
  - the company identification of each ink employed;
  - whether or not each ink is a photochemically reactive material;
  - the number of gallons of each ink employed;

- i. the organic compound content of each ink, in pounds per gallon; and
- j. the total organic compound emission rate for all inks, in pounds.
- D. **Reporting Requirements**
  - 1. The permittee shall submit deviation (excursion) reports which include the following information:
    - a. an identification of all exceedances of the rolling, 12-month organic solvent usage limitation for presses K003, K004, K005, P001, P002, & P003; and
    - b. an identification of any rolling, 12-month period in which an individual HAP emissions exceeded 9.9 tons or the combined HAPs emissions exceeded 24.9 tons from all emissions units at this facility and the HAP emission rate for such periods.
  - 2. The permittee shall submit annual reports by February 1 of each year showing the total organic compound emissions from this emissions unit for the previous calendar year.
  - 3. The permittee shall notify the Canton LAA in writing of any monthly record showing the use of photochemically reactive materials. The notification shall include a copy of such record as well as the actual organic compound emissions for each day that the record indicates a photochemically reactive material was employed. These reports shall be sent to the Canton LAA within 30 days following the end of the calendar month.
- E. **Testing Requirements**
  - 1. Compliance with the emission limitation(s) in the Air Emissions Summary and Section A of these terms and conditions shall be determined in accordance with the following methods:
    - Emission Limitation  
The total combined emissions of organic compounds from presses K003, K004, K005, P001, P002, & P003 shall not exceed 87.8 tons per year.
    - Applicable Compliance Method  
Monthly record keeping as required by section II.C.2.
    - Emission Limitation  
The emissions [as defined by OAC rule 3745-77-01 (BB) of hazardous air pollutants (HAPs)] from all emissions units at this facility, as identified in Section 112(b) of Title III of the Clean Air Act, shall not exceed 9.9 tons per rolling, 12-month period for any single HAP and 24.9 tons per rolling, 12-month period for any combination of HAPs.
    - Applicable Compliance Method  
Monthly record keeping as required by section II.C.1.
- F. **Miscellaneous Requirements**
  - 1. None

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

Facility ID: 1576130147 Emissions Unit ID: P002 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>
P002 - Silk screen printing press; S-7	OAC rule 3745-31-05(A)(3) PTI 15-01431	8 pounds OC/hour (See section II.A.2.c. below.) 0.61 ton OC/month 7.3 tons OC/year
	OAC rule 3745-35-07(B) PTI 15-01431	The combined emissions of organic compounds from presses K003, K004, K005, P001, P002, & P003 shall not exceed 87.8 tons per year. This limitation shall be

achieved by limiting the organic solvent usage rate to 87.8 tons per year based upon a rolling, 12-month summation of the monthly organic solvent usage figures. (See section II.A.2.a. below.)

Facility emission limitations:  
 9.9 tons of any individual HAP per rolling, 12-month period (See section II.A.2.b. below.)  
 24.9 tons of total HAPs per rolling, 12-month period (See section II.A.2.b. below.)  
 (See section II.A.2.d. below.)

OAC rule 3745-21-07 (G)(2)

**2. Additional Terms and Conditions**

- (a) Organic solvent usage shall include the organic solvent found in the inks as employed, the makeup organic solvent added to the inks and any cleanup organic solvents employed. Historical reports, submitted by the permittee since January of 1997, have shown that this facility is in compliance with this limit.
- The emissions [as defined by OAC rule 3745-77-01 (BB) of hazardous air pollutants (HAPs)] from all emissions units at this facility, as identified in Section 112(b) of Title III of the Clean Air Act, shall not exceed 9.9 tons per rolling, 12-month period for any single HAP and 24.9 tons per rolling, 12-month period for any combination of HAPs. Historical reports, submitted by the permittee since January of 1997, have shown that this facility is in compliance with these limits.
- The hourly OC emission limit of 8 lbs/hr represents the maximum potential to emit of this emissions unit; so, no record keeping will be required to verify compliance.
- This emissions unit shall not employ inks or cleanup solvents which are photochemically reactive materials as defined by OAC rule 3745-21-01 (C)(5). This determination shall be based on the actual formulation of the inks after in-plant reducing or thinning and prior to application of the product. Prior to employing any inks or cleanup solvents which are photochemically reactive materials, the permittee shall provide written notification to, and obtain approval from the Canton local air agency. Such notification shall include information sufficient to determine that the emissions with the proposed change in materials will comply with the emission limits and/or control requirements as defined in OAC rule 3745-21-07(G)(2). This notification, at a minimum, shall include the company identification of the new material to be employed, the solvent composition of the material, and the maximum amount to be used, in pounds per hour.

**B. Operational Restrictions**

1. None

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

1. The permittee shall collect and record the following information each month for the printing operation:
- the company identification for each cleanup material employed;
  - documentation on whether or not each cleanup material is a photochemically reactive material; and
  - the number of gallons of any photochemically reactive cleanup solvent employed.
- [Note: The definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]
2. The permittee shall collect and record the following information each month for each ink employed in this emissions unit:
- whether the ink contains photochemically reactive materials (PRM) as defined in OAC 3745-21-01(C)(5); and
  - the gallons of ink employed which contained any PRM.
3. The permittee shall collect and record the following information each month in order to determine whether the combined organic solvent usage limits for presses K003, K004, K005, P001, P002, & P003 are being met:
- the total monthly organic solvent usage rate from presses K003, K004, K005, P001, P002, & P003;
  - the rolling, 12-month organic solvent usage rate from presses K003, K004, K005, P001, P002, & P003;
  - the total individual HAP emissions for each HAP from all coatings, inks, and cleanup materials employed in presses K003, K004, K005, P001, P002, & P003, in pounds or tons per month and pounds or tons per rolling, 12-month period; and
  - the total combined HAP emissions from all coatings, inks, and cleanup materials employed in presses K003, K004, K005, P001, P002, & P003, in pounds or tons per month and pounds or tons per rolling, 12-month period.
4. The permittee shall collect and record the following information, on a monthly basis, for the purpose of determining annual organic compound emissions from this emissions unit:
- the company identification of each cleanup material employed;
  - the number of gallons of each cleanup material employed;
  - the organic compound content of each cleanup material, in pounds per gallon;
  - the total organic compound emission rate for all cleanup materials, in pounds;
  - the company identification of each ink employed;

- f. the number of gallons of each ink employed;
- g. the organic compound content of each ink, in pounds per gallon;
- h. the total organic compound emission rate for all inks, in pounds;
- i. the company identification of each makeup organic solvent employed;
- j. the number of gallons of each makeup organic solvent employed; and
- k. the total organic compound emission rate for all makeup organic solvents, in pounds.

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. an identification of all exceedances of the rolling, 12-month usage limitation of 87.8 tons for organic solvent from presses K003, K004, K005, P001, P002, & P003;
  - b. an identification of any inks employed which are photochemically reactive materials and the quantity of such ink usage;
  - c. an identification of any cleanup materials employed which contain photochemically reactive materials and the quantity of such cleanup materials employed;
  - d. an identification of any rolling, 12-month period in which an individual HAP emissions exceeded 9.9 tons or the combined HAPs emissions exceeded 24.9 tons from all emissions units at this facility and the HAP emission rate for such periods; and
  - e. an identification of any month in which the OC emissions exceeded 0.61 ton.
2. The permittee shall submit annual reports by February 1 of each year showing the total organic compound emissions from this emissions unit for the previous calendar year.

**E. Testing Requirements**

1. Compliance with the emission limitation(s) in the Air Emissions Summary and Section A of these terms and conditions shall be determined in accordance with the following methods:
  - Emission Limitation**  
The total combined emissions of organic compounds from presses K003, K004, K005, P001, P002, & P003 shall not exceed 87.8 tons per year.
  - Applicable Compliance Method**  
Monthly record keeping of organic solvent usage as required by section II.C.3.
  - Emission Limitation**  
The emissions [as defined by OAC rule 3745-77-01 (BB) of hazardous air pollutants (HAPs)] from all emissions units at this facility, as identified in Section 112(b) of Title III of the Clean Air Act, shall not exceed 9.9 tons per rolling, 12-month period for any single HAP and 24.9 tons per rolling, 12-month period for any combination of HAPs.
  - Applicable Compliance Method**  
Monthly record keeping as required by section II.C.3.
  - Emission Limitation**  
0.61 ton OC/month and 7.3 tons OC/year
  - Applicable Compliance Method**  
Monthly record keeping as required by section II.C.4.
  - Emission Limitation**  
8 pounds OC/hour
  - Applicable Compliance Method**  
8 pounds OC/hour represents the maximum potential to emit; so, no hourly record keeping is required to verify compliance.

**F. Miscellaneous Requirements**

1. Pursuant to Engineering Guide #69, modeling to demonstrate compliance with the Ohio EPA's Air Toxic Policy did not apply since the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install 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 result in an increase in emissions of any pollutant that has a listed TLV to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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

Facility ID: 1576130147 Emissions Unit ID: P003 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>
P003 - Silk screen printing press and varnish coater; S-9	OAC rule 3745-35-07(B) PTI 15-01431	The combined emissions of organic compounds from presses K003, K004, K005, P001, P002, & P003 shall not exceed 87.8 tons per year. This limitation shall be achieved by limiting the organic solvent usage rate to 87.8 tons per year based upon a rolling, 12-month summation of the monthly emissions. (See section II.A.2.a. below.)  Facility emission limitations: 9.9 tons of any individual HAP per rolling, 12-month period (See section II.A.2.b. below.) 24.9 tons of total HAPs per rolling, 12-month period (See section II.A.2.b. below.)  See section II.A.2.c. below.
	OAC rule 3745-21-07(G)(2)	

**2. Additional Terms and Conditions**

- (a) Organic solvent usage shall include the organic solvent found in the inks and coatings as employed, the makeup organic solvent added to the inks and coatings and any cleanup organic solvents employed. Historical reports, submitted by the permittee since January of 1997, have shown that this facility is in compliance with this limit.  
The emissions [as defined by OAC rule 3745-77-01 (BB) of hazardous air pollutants (HAPs)] from all emissions units at this facility, as identified in Section 112(b) of Title III of the Clean Air Act, shall not exceed 9.9 tons per rolling, 12-month period for any single HAP and 24.9 tons per rolling, 12-month period for any combination of HAPs. Historical reports, submitted by the permittee since January of 1997, have shown that this facility is in compliance with these limits.  
This emissions unit shall not employ coatings or inks which are photochemically reactive materials as defined by OAC rule 3745-21-01 (C)(5). This determination shall be based on the actual formulation of the inks after in-plant reducing or thinning and prior to application of the product. Prior to employing any coatings or inks which are photochemically reactive materials, the permittee shall provide written notification to, and obtain approval from the Canton local air agency. Such notification shall include information sufficient to determine that the emissions with the proposed change in materials will comply with the emission limits and/or control requirements as defined in OAC rule 3745-21-07(G)(2). This notification, at a minimum, shall include the company identification of the new material to be employed, the solvent composition of the material, and the maximum amount to be used, in pounds per hour.

**B. Operational Restrictions**

1. None

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

1. The permittee shall collect and record the following information each month in order to determine whether the combined emission limits for presses K003, K004, K005, P001, P002, & P003 are being met:
  - a. the total monthly organic compound emission rate from presses K003, K004, K005, P001, P002, & P003;
  - b. the rolling, 12-month organic compound emission rate from presses K003, K004, K005, P001, P002, & P003;
  - c. the total individual HAP emissions for each HAP from all inks, coatings and cleanup materials employed in presses K003, K004, K005, P001, P002, & P003, in pounds or tons per month and pounds or tons per rolling, 12-month period; and
  - d. the total combined HAP emissions from all inks, coatings and cleanup materials employed in presses K003, K004, K005, P001, P002, & P003, in pounds or tons per month and pounds or tons per rolling, 12-month period.
2. The permittee shall collect and record the following information, on a monthly basis, for the purpose of determining annual organic compound emissions from this emissions unit:
  - a. the company identification of each cleanup material employed;
  - b. whether or not each cleanup material is a photochemically reactive material;
  - c. the number of gallons of each cleanup material employed;
  - d. the organic compound content of each cleanup material, in pounds per gallon;

- e. the total organic compound emission rate for all cleanup materials, in pounds;
- f. the company identification of each ink and coating employed;
- g. whether or not each ink and coating is a photochemically reactive material;
- h. the number of gallons of each ink and coating employed;
- i. the organic compound content of each ink and coating, in pounds per gallon; and
- j. the total organic compound emission rate for all inks and coatings, in pounds.

**D. Reporting Requirements**

- 1. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. an identification of all exceedances of the rolling, 12-month emission limitation of 87.8 tons for organic compound emissions from presses K003, K004, K005, P001, P002, & P003; and
  - b. an identification of any rolling, 12-month period in which an individual HAP emissions exceeded 9.9 tons or the combined HAPs emissions exceeded 24.9 tons from all emissions units at this facility and the HAP emission rate for such periods.
- 2. The permittee shall submit annual reports by February 1 of each year showing the total organic compound emissions from this emissions unit for the previous calendar year.
- 3. The permittee shall notify the Canton LAA in writing of any monthly record showing the use of any coatings or inks that contain photochemically reactive materials. The notification shall include a copy of such record as well as the actual organic compound emissions for each day that the record indicates a photochemically reactive material was employed. These reports shall be sent to the Canton LAA within 30 days following the end of the calendar month.

**E. Testing Requirements**

- 1. Compliance with the emission limitation(s) in the Air Emissions Summary and Section A of these terms and conditions shall be determined in accordance with the following methods:
  - Emission Limitation  
The total combined emissions of organic compounds from presses K003, K004, K005, P001, P002, & P003 shall not exceed 87.8 tons per year, based upon a rolling, 12-month summation of the monthly emissions.  
  
Applicable Compliance Method  
Monthly record keeping as required by section II.C.1.
  - Emission Limitation  
The emissions [as defined by OAC rule 3745-77-01 (BB) of hazardous air pollutants (HAPs)] from all emissions units at this facility, as identified in Section 112(b) of Title III of the Clean Air Act, shall not exceed 9.9 tons per rolling, 12-month period for any single HAP and 24.9 tons per rolling, 12-month period for any combination of HAPs.  
  
Applicable Compliance Method  
Monthly record keeping as required by section II.C.2.

**F. Miscellaneous Requirements**

- 1. None