

Facility ID: 1677000105 Issuance type: Title V Proposed Permit

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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 III" and before "I. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

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Facility ID: 1677000105 Issuance type: Title V Proposed Permit

Part II - Specific Facility Terms and Conditions

a State and Federally Enforceable Section

1. Pechiney Plastic Packaging, Inc. requested to restrict the emissions of any individual Hazardous Air Pollutant (HAP) to 9.9 tons per rolling, 12-month period, the emissions of total combined HAPs to 24.9 tons per rolling, 12-month period, and the emissions of volatile organic compounds (VOC) to 358.9 tons per rolling, 12-month period. The company proposed these emission limits to avoid PSD permitting and the Printing and Publishing MACT, 40 CFR Part 63, subpart KK. Pechiney Plastic Packaging, Inc., has accepted these emission limits as a facility-wide caps on emissions from emissions units K003, K006, K008, K010, K013, K016, K017, K018, K020, T001, T002, and T003.

[Authority for term: OAC rule 3745-31-05 and OAC rule 3745-77-07(A)(1)]

2. In order to determine compliance with the facility-wide emission limitations, the permittee shall maintain monthly records of the following information for emissions units K003, K006, K008, K010, K013, K016, K017, K018, K020, T001, T002, and T003:

[Authority for term: OAC rule 3745-31-05 and OAC rule 3745-77-07(C)(1)]

- a. For emissions units without control equipment (K017 and K018), the permittee shall collect and record the following information:

- i. the name and identification of each coating;
- ii. the VOC content of each coating, in weight percent;
- iii. the individual HAP content for each HAP of each coating, in weight percent;
- iv. the total pounds of each coating employed;
- v. the name and identification of each solvent* employed;
- vi. the VOC content of each solvent, in weight percent;
- vii. the individual HAP content for each HAP of each solvent, in weight percent;
- viii. the total pounds of each solvent employed;
- ix. the total uncontrolled individual HAP emissions for each HAP for all coatings and solvents employed, in tons per month (for each HAP, the sum of section 2.a.iii divided by 100 times section 2.a.iv for each coating plus the sum of section 2.a.vii divided by 100 times section 2.a.viii for each solvent, divided by 2000);
- x. the uncontrolled total combined HAPs emissions for all coatings and solvents employed, in tons per month (the sum of the individual HAP emissions in section 2.a.ix); and
- xi. the total uncontrolled VOC emissions for all coatings and solvents employed, in tons per month (the sum of section 2.a.ii divided by 100 times section 2.a.iv for each coating plus the sum of section 2.a.vi divided by 100 times section 2.a.viii for each solvent, divided by 2000).

*Solvent is defined as cleanup material and coating thinning material.

[Authority for term: OAC rule 3745-31-05 and OAC rule 3745-77-07(C)(1)]

- b. For emissions units with control equipment (K003, K006, K008, K010, K013, K016, and K020), the permittee shall collect and record the following information:

- i. the name and identification of each coating;
- ii. the VOC content of each coating, in weight percent;
- iii. the individual HAP content for each HAP of each coating, in weight percent;

- iv. the total pounds of each coating employed;
 - v. the name and identification of each solvent* employed;
 - vi. the VOC content of each solvent, in weight percent;
 - vii. the individual HAP content for each HAP of each solvent, in weight percent;
 - viii. the total pounds of each solvent employed;
 - ix. the total uncontrolled individual HAP emissions for each HAP for all the coatings and solvents employed, in tons per month (for each HAP, the sum of section 2.b.iii divided by 100 times section 2.b.iv for each coating plus the sum of section 2.b.vii divided by 100 times section 2.b.viii for each solvent, divided by 2000);
 - x. the uncontrolled total combined HAPs emissions for all the coatings and solvents employed, in tons per month (the sum of the individual HAP emissions in section 2.b.ix);
 - xi. the total uncontrolled VOC accounted for in all coatings and solvents employed, in tons per month (the sum of section 2.b.ii divided by 100 times section 2.b.iv for each coating plus the sum of section 2.b.v divided by 100 times section 2.b.viii for each solvent, divided by 2000);
 - xii. the total number of coating waste drums;
 - xiii. the total amount of VOC accounted for in the coating waste drums, in tons per month;
 - xiv. the total uncontrolled VOC emissions, in tons per month (section 2.b.xi minus section 2.b.xiii);
 - xv. the linear feet of material produced by each emissions unit;
 - xvi. the total linear feet of material produced by all of emissions units that employ control equipment;
- b.
- xvii. if the uncontrolled individual HAP emission rate for any HAP is calculated to be greater than 9.9 tons per rolling, 12-month period, then the permittee shall calculate the total uncontrolled individual HAP emissions for each HAP for each emissions unit, in tons per month (for each emissions unit section 2.b.xv divided by section 2.b.xvi and then multiplied by section 2.b.ix);
 - xviii. if the uncontrolled total combined HAPs emission rate is calculated to be greater than 24.9 tons per rolling, 12-month period, then the permittee shall calculate the uncontrolled total combined HAPs emissions for each emissions unit, in tons per month (for each emissions unit section 2.b.xv divided by section 2.b.xvi and then multiplied by section 2.b.x);
 - xix. the total uncontrolled VOC emissions for each emissions unit, in tons per month (for each emissions unit section 2.b.xv divided by section 2.b.xvi and then multiplied by section 2.b.xiv);
 - xx. if the uncontrolled individual HAP emission rate for any HAP is calculated to be greater than 9.9 tons per rolling, 12-month period, then the permittee shall calculate for each emissions unit the controlled individual HAP emission rate for all coatings and solvents, in tons per month (the controlled emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance);
 - xxi. if the uncontrolled total combined HAPs emission rate is calculated to be greater than 24.9 tons per rolling, 12-month period, then the permittee shall calculate for each emissions unit the controlled total combined HAPs emission rate for all coatings and solvents, in tons per month (the controlled emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance);
- b.
- xxii. for each emissions unit, the calculated, controlled VOC emission rate for all coatings and solvents, in tons per month (the controlled emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance);
 - xxiii. if the uncontrolled individual HAP emission rate for any HAP is calculated to be greater than 9.9 tons per rolling, 12-month period, then the permittee shall calculate the total controlled individual HAP emission rate for all the emissions units, in tons per month (for each HAP, sum all the calculated, controlled individual HAP emission rates for each emissions unit from section 2.b.xx);
 - xxiv. if the uncontrolled total combined HAPs emission rate is calculated to be greater than 24.9 tons per rolling, 12-month period, then the permittee shall calculate the controlled total combined HAPs emission rate for all the emissions units, in tons per month (sum all the calculated, controlled total combined HAPs emission rates for each emissions unit from section 2.b.xxi); and
 - xxv. the total calculated, controlled VOC emission rate for all the emissions units, in tons per month (sum all the calculated, controlled VOC emission rates for each emissions unit from section 2.b.xxii).
- *Solvent is defined as cleanup material and coating thinning material.
- [Authority for term: OAC rule 3745-31-05 and OAC rule 3745-77-07(C)(1)]
- c. For emissions units with control equipment but vent complying coatings to atmosphere (K010 and K020), the permittee shall collect and record the following information for the coatings that are vented to

atmosphere:

- i. the name and identification of each coating;
- ii. the VOC content of each coating, in weight percent;
- iii. the individual HAP content for each HAP of each coating, in weight percent;
- iv. the total pounds of each coating employed;
- v. the name and identification of each solvent* employed;
- vi. the VOC content of each solvent, in weight percent;
- vii. the individual HAP content for each HAP of each solvent, in weight percent;
- viii. the total pounds of each solvent employed;
- ix. the total uncontrolled individual HAP emissions for each HAP for all coatings and solvents employed, in tons per month (for each HAP, the sum of section 2.c.iii divided by 100 times section 2.c.iv for each coating plus the sum of section 2.c.vii divided by 100 times section 2.c.viii for each solvent, divided by 2000);
- x. the uncontrolled total combined HAPs emissions for all coatings and solvents employed, in tons per month (the sum of the individual HAP emissions in section 2.c.ix);
- xi. for each emissions unit, the total uncontrolled VOC emissions for all coatings and solvents employed, in tons per month (the sum of section 2.c.ii divided by 100 times section 2.c.iv for each coating plus the sum of section 2.c.vi divided by 100 times section 2.c.viii for each solvent, divided by 2000); and
- xii. the total uncontrolled VOC emissions from both emissions units, in tons per month (sum all of the VOC emission rates for each emissions unit from section 2.c.xi).

*Solvent is defined as cleanup material and coating thinning material.

[Authority for term: OAC rule 3745-31-05 and OAC rule 3745-77-07(C)(1)]

- d. For total facility emissions, the permittee shall collect and record the following information:
 - i. the total uncontrolled individual HAP emissions for each HAP for the entire facility, in tons per month (section 2.a.ix plus section 2.b.ix plus section 2.c.ix plus 0.04 ton per month*);
 - ii. the total uncontrolled combined HAPs emissions for the entire facility, in tons per month (section 2.a.x plus section 2.b.x plus section 2.c.x plus 0.15 ton per month*);
 - iii. if the uncontrolled individual HAP emission rate for any HAP is calculated to be greater than 9.9 tons per rolling, 12-month period, then the permittee shall calculate the controlled total individual HAP emissions for the entire facility, in tons per month (section 2.a.ix plus section 2.b.xxiii plus section 2.c.ix plus 0.01 ton per month**);
 - iv. if the uncontrolled total combined HAPs emission rate is calculated to be greater than 24.9 tons per rolling, 12-month period, then the permittee shall calculate the controlled total combined HAPs emissions for the entire facility, in tons per month (section 2.a.x plus section 2.b.xxiv plus section 2.c.x plus 0.05 ton per month**);
 - v. the total VOC emissions for the entire facility, in tons per month (section 2.a.xi plus section 2.b.xxv plus section 2.c.xii plus 0.25 ton per month**** plus 0.03 ton per month****);
 - vi. the permittee shall record the rolling, 12-month summation of the monthly uncontrolled emissions of each individual HAP for the entire facility for each calendar month;
 - vii. the permittee shall record the rolling, 12-month summation of the monthly uncontrolled emissions of total combined HAPs for the entire facility for each calendar month;
- viii. the permittee shall record the rolling, 12-month summation of the monthly emissions of VOC for the entire facility for each calendar month;
- ix. if the uncontrolled individual HAP emission rate for any HAP is calculated to be greater than 9.9 tons per rolling, 12-month period, then the permittee shall record the rolling, 12-month summation of the monthly controlled emissions of each individual HAP for the entire facility for each calendar month; and
- x. if the uncontrolled total combined HAPs emission rate is calculated to be greater than 24.9 tons per rolling, 12-month period, then the permittee shall record the rolling, 12-month summation of the monthly controlled emissions of total combined HAPs for the entire facility for each calendar month.

*The uncontrolled HAP/HAPs emissions from the natural gas combustion from the incinerator (oxidizer) and ovens.

**The controlled HAP/HAPs emissions from the natural gas combustion from the incinerator (oxidizer) and ovens.

***The controlled VOC emissions from the natural gas combustion from the incinerator (oxidizer) and ovens.

**** The potential to emit for VOC for the three storage tanks is 3.0 tons per year (0.25 ton per month). The storage tanks do not store any HAP.

[Authority for term: OAC rule 3745-31-05 and OAC rule 3745-77-07(C)(1)]

3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitations for VOC, individual HAP, and total combined HAPs. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition (A) (1)(c).

[Authority for term: OAC rule 3745-31-05 and OAC rule 3745-77-07(C)(1)]

4. The permittee shall submit annual reports that specify the following information:

a. for the entire facility, the rolling, 12-month summations of monthly emissions of VOC, individual HAP, and total combined HAPs for each month during the calendar year (January through December); and

b. for each emissions unit, the VOC emission rate, in tons per year.

The annual reports shall be submitted by January 31 of each year, and shall cover the records for the previous calendar year (January through December). This reporting requirement may be satisfied by including and identifying the specific emission data (VOC, individual HAPs, and combined HAPs) for each emissions unit in the facility's annual Fee Emission Report.

[Authority for term: OAC rule 3745-31-05 and OAC rule 3745-77-07(C)(1)]

5. Compliance with the emission limitations in section A.1 of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation:

9.9 tons of HAP per rolling, 12-month period
24.9 tons of HAPs per rolling, 12-month period
358.9 tons of VOC per rolling, 12-month period

Applicable Compliance Method:

In accordance with sections A.2, A.2.a, A.2.b, and A.2.c of these terms and conditions, the permittee shall maintain monthly records of the VOC content, individual HAP content, and total combined HAPs content, in weight percent, as applied, of each coating and solvent and the total pounds of each coating and solvent employed. 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 VOC contents of the coatings and inks. Formulation data shall be used to determine the HAP contents of the coatings and solvents.

[Authority for term: OAC rule 3745-31-05 and OAC rule 3745-77-07(C)(1)]

6. The following insignificant emissions units are located at this facility:

T001 - Tank 1 (PTI 16-957);
T002 - Tank 2 (PTI 16-957); and
T003 - Tank 3 (PTI 16-957).

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within the identified permit to install for the emissions unit. Insignificant emissions units listed above that are not subject to specific permit to install requirements are subject to one or more applicable requirements contained in the federally - approved versions of OAC Chapters 3745-17, 3745-18, and/or 3745-21.

[Authority for term: OAC rule 3745-77-07(A)(13)]

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b State Only Enforceable Section

1. The following insignificant emissions units located at this facility are exempt from permit requirements because they are not subject to any applicable requirements (as defined in OAC rule 3745-77-01(H)) or because they meet the "de minimis" criteria established in OAC rule 3745-15-05:

Z002 - Curl Oven 1;
Z003 - Curl Oven 2;
Z004 - Micro Clean Sand Blast Cleaner;
Z005 - Micro Clean Hand Blast Cleaner;
Z006 - DCM Seamer 1;
Z007 - Flammable Solvent Recovery System;
Z008 - Plate Room Solvent Recovery System; and
Z009 - DCM Seamer 2.

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 1677000105 Emissions Unit ID: K003 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. 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>
6-color flexographic printing press/outboard rotogravure station - W & H I, controlled with a thermal incinerator (oxidizer).	OAC rule 3745-31-05(A)(3) (PTI 16-222) OAC rule 3745-21-09(Y)(1)(b)	The requirements established pursuant to this rule are equivalent to the requirements of OAC rule 3745-21-09(Y). See A.I.2.a below.

2. Additional Terms and Conditions

- a. The printing line shall be equipped with a capture system and associated control system which are designed and operated to achieve the following efficiencies for volatile organic compounds (VOC):

- (a)
 - i. a capture efficiency which is at least 65 percent, by weight, for a flexographic printing line; and
 - ii. a control efficiency which is at least 90 percent, by weight.

[Authority for term: OAC rule 3745-21-09(Y)(1)(b) and OAC rule 3745-31-05(A)(3)]

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II. Operational Restrictions

1. The VOC emissions from this emissions unit shall be vented to the thermal incinerator (oxidizer) when the emissions unit is in operation.

[Authority for term: OAC rule 3745-77-07(A)(1)]
2. The average combustion temperature within the thermal incinerator (oxidizer), for any 3-hour block of time, shall not be less than 1550 degrees Fahrenheit or shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance.

[Authority for term: OAC rule 3745-77-07(A)(1)]
3. This emissions unit shall be operated with an interlock system that prevents the operation of this emissions unit when materials not meeting the VOC content limitations specified in OAC rule 3745-21-09(Y)(1)(a)(i) or (ii) are utilized and the thermal incinerator (oxidizer) is not in operation.

[Authority for term: OAC rule 3745-77-07(A)(1)]
4. All ventilation fans associated with this emissions unit and the thermal incinerator (oxidizer) shall be in operation at all times when this emissions unit is in operation and utilizing materials that do not meet the VOC content limitations specified in OAC rule 3745-21-09(Y)(1)(a)(i) or (ii).

[Authority for term: OAC rule 3745-77-07(A)(1)]

5. All bypass dampers, actuator pins, and associated motors shall be in the correct position and in good operating condition at all times when this emissions unit is in operation and utilizing materials that do not meet the VOC content limitations specified in OAC rule 3745-21-09(Y)(1)(a)(i) or (ii), to ensure that all captured VOC emissions are vented to the thermal incinerator (oxidizer). Also, all the hooding and ductwork comprising the VOC emission capture system for this emissions unit shall be free of leaks and holes that would permit the escape of the captured VOC emissions.

[Authority for term: OAC rule 3745-77-07(A)(1)]

6. The average, total exhaust flow rate from this emissions unit to the thermal incinerator (oxidizer) shall not be less than 3,215 standard cubic feet per minute (scfm) or shall not be less than the exhaust flow rate documented during the last emission tests that demonstrated the emissions unit was in compliance with the applicable capture efficiency limitation.

[Authority for term: OAC rule 3745-77-07(A)(1)]

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain records documenting any time periods when the emissions unit was in operation and the emissions from the emissions unit were not vented to the thermal incinerator (oxidizer).

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator (oxidizer). Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

[Authority for term: OAC rule 3745-77-07(C)(1)]

3. The permittee shall collect and record the following information for each day for the control equipment:

a. all 3-hour blocks of time (when the emissions unit was in operation) during which the average combustion temperature within the thermal incinerator (oxidizer) was less than 1550 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance; and

b. a log of operating time for the capture (collection) system, thermal incinerator (oxidizer), monitoring equipment, and the associated emissions unit. The permittee may use recorded temperature data as the log documenting that the monitoring equipment and control device are operating. Bypass of the collection system by the emissions unit shall be logged as to the date and time.

[Authority for term: OAC rule 3745-21-09(B)(3)(I) and OAC rule 3745-77-07(C)(1)]

4. On an annual basis, the permittee shall inspect the electronics of the interlock system used for this emissions unit to verify the signals between the thermal incinerator (oxidizer) and the emissions unit are functioning properly. The permittee shall document the results of all annual inspections. An excursion is defined as a finding that the interlock is inoperative. Any excursion shall require that the process line be immediately shut down and remain shut down until the problem has been corrected.

[Authority for term: OAC rule 3745-77-07(C)(1)]

5. Except as noted below, each calendar quarter, the permittee shall utilize an anemometer, or any other equivalent measurement method approved by the Ohio EPA, to measure the total exhaust flow rate from this emissions unit to the thermal incinerator (oxidizer), in scfm. The anemometer, or other equivalent measurement method approved by the Ohio EPA, shall be capable of accurately measuring the desired parameter and shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee. The measurements shall be taken while this emissions unit and all other printing lines at the facility are in a normal mode of operation. The permittee shall maintain records of the results of all exhaust flow rate measurements.

If the total exhaust flow rate measurements for four consecutive quarters do not identify a deviation of the applicable operational restriction, the permittee may perform the total exhaust flow rate measurements on a semiannual basis. Should the total exhaust flow rate measurements taken on a semiannual basis identify a deviation of the applicable operational restriction, the permittee shall revert to quarterly measurements.

[Authority for term: OAC rule 3745-77-07(C)(1)]

6. Each calendar month, the permittee shall inspect the operational condition and integrity of each ventilation fan comprising the capture system. Ventilation fan observations shall include visual inspections of the fan wheel, belts, and bearings. Lubrication of bearings and replacement of parts shall occur as necessary. The permittee shall document the results of all monthly inspections, including any corrective actions taken.

[Authority for term: OAC rule 3745-77-07(C)(1)]

7. Each calendar month, the permittee shall inspect the operational condition and integrity of all hooding, ductwork, and bypass dampers comprising the capture system. Hooding and ductwork observations shall include visual inspections for leaks or holes. Bypass damper observations shall include visual inspections to verify that the damper setting is in the correct position (i.e., to the thermal incinerator (oxidizer) or to atmosphere) and visual inspections of the actuator and motor to verify that the actuator pin and the motor are operating properly. The permittee shall document the results of all monthly inspections, including any

corrective actions taken.

[Authority for term: OAC rule 3745-77-07(C)(1)]

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IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify any time periods when the emissions unit was in operation and the emissions from the emissions unit were not vented to the thermal incinerator (oxidizer). Each report shall be submitted within 30 days after the deviation occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. The permittee shall submit quarterly summaries of the following records:
 - a. all 3-hour blocks of time (when the emissions unit was in operation) during which the average combustion temperature within the thermal incinerator (oxidizer) was less than 1550 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance; and

b. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

These quarterly summaries shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

[Authority for term: OAC rule 3745-21-09(B)(3)(m) and OAC rule 3745-77-07(C)(1)]

3. The permittee shall submit quarterly deviation (excursion) reports that identify the following events when this emissions unit is utilizing materials that do not meet the VOC content limitations specified in OAC rule 3745-21-09(Y)(1)(a)(i) or (ii):

a. each time the interlock system does not stop the operation of this emissions unit when the thermal incinerator (oxidizer) is not in operation;

b. each average, total exhaust flow rate measurement that does not comply with the operational restriction specified in section A.II.6, based on the records maintained pursuant to section A.III.5 of these terms and conditions, and the magnitude of each deviation; and

c. each time any bypass dampers, actuator pins, and/or associated motors are not in the correct position and in good operating condition and/or any of the hooding or ductwork comprising the VOC emission capture system contains leaks or holes that would permit the escape of the captured VOC emissions.

[Authority for term: OAC rule 3745-77-07(C)(1)]

4. The permittee shall submit annual reports that specify the results of each annual inspection of the electronics of the ventilation fan interlock systems and the thermal incinerator (oxidizer) interlock system, based on the records maintained pursuant to section A.III.4 of these terms and conditions.

[Authority for term: OAC rule 3745-77-07(C)(1)]

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V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted by November 4, 2008 to determine the control efficiency of the thermal incinerator (oxidizer). (Control efficiency testing to demonstrate compliance with the applicable 90 percent control efficiency limitation was performed on November 4, 2003, pursuant to the installation of the thermal incinerator (oxidizer)).

b. The emission testing shall be conducted to demonstrate compliance with the 90 percent, by weight, control efficiency limitation for VOC. (Capture efficiency testing to demonstrate compliance with the applicable 65 percent capture efficiency limitation was performed on January 29, 1999.)

c. The test method(s) which must be employed to demonstrate compliance with the capture and control efficiency limitations for VOC are specified below. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Akron RAQMD.

e. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

f. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC

rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

g. During each capture efficiency test run, the permittee shall measure the total exhaust flow rate from this emissions unit to the thermal incinerator (oxidizer), in scfm.

[Authority for term: OAC rule 3745-21-10(C) and OAC rule 3745-77-07(C)(1)]

2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Akron RAQMD. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Akron RAQMD's refusal to accept the results of the emission test(s).

[Authority for term: OAC rule 3745-77-07(C)(1)]

3. Personnel from the Akron RAQMD shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

[Authority for term: OAC rule 3745-77-07(C)(1)]

4. A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Akron RAQMD within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Akron RAQMD.

[Authority for term: OAC rule 3745-77-07(C)(1)]

5. Compliance with the emission limitations and control efficiency requirements in sections A.1.1 and A.1.2 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

A control efficiency which is at least 90 percent, by weight, for VOC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing requirements specified in section A.V.1.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- b. Emission Limitation:

A capture efficiency which is at least 65 percent, by weight, for VOC

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon the emission testing requirements specified in section A.V.1.

[Authority for term: OAC rule 3745-77-07(C)(1)]

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 1677000105 Emissions Unit ID: K003 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **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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2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 1677000105 Emissions Unit ID: K006 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **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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6-color flexographic printing press - PC 3	OAC rule 3745-31-05(A)(3)	The requirements established pursuant to this rule are
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and an in-line adhesive laminator - LAM 2, (PTI 16-068) equivalent to the requirements of OAC rule 3745-21-09(Y).
controlled with a thermal incinerator (oxidizer)

OAC rule 3745-21-09(Y)(1)(b) See A.I.2.a below.

2. **Additional Terms and Conditions**

- a. The printing line shall be equipped with a capture system and associated control system which are designed and operated to achieve the following efficiencies for volatile organic compounds (VOC):

(a)

- i. a capture efficiency which is at least 65 percent, by weight, for a flexographic printing line; and
ii. a control efficiency which is at least 90 percent, by weight.

[Authority for term: OAC rule 3745-21-09(Y)(1)(b) and OAC rule 3745-77-07(A)(3)]

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II. **Operational Restrictions**

1. The VOC emissions from this emissions unit shall be vented to the thermal incinerator (oxidizer) when the emissions unit is in operation.

[Authority for term: OAC rule 3745-77-07(A)(1)]

2. The average combustion temperature within the thermal incinerator (oxidizer), for any 3-hour block of time, shall not be less than 1550 degrees Fahrenheit or shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance.

[Authority for term: OAC rule 3745-77-07(A)(1)]

3. This emissions unit shall be operated with an interlock system that prevents the operation of this emissions unit when materials not meeting the VOC content limitations specified in OAC rule 3745-21-09(Y)(1)(a)(i) or (ii) are utilized and the thermal incinerator (oxidizer) is not in operation.

[Authority for term: OAC rule 3745-77-07(A)(1)]

4. All ventilation fans associated with this emissions unit and the thermal incinerator (oxidizer) shall be in operation at all times when this emissions unit is in operation and utilizing materials that do not meet the VOC content limitations specified in OAC rule 3745-21-09(Y)(1)(a)(i) or (ii).

[Authority for term: OAC rule 3745-77-07(A)(1)]

5. All bypass dampers, actuator pins, and associated motors shall be in the correct position and in good operating condition at all times when this emissions unit is in operation and utilizing materials that do not meet the VOC content limitations specified in OAC rule 3745-21-09(Y)(1)(a)(i) or (ii), to ensure that all captured VOC emissions are vented to the thermal incinerator (oxidizer). Also, all the hooding and ductwork comprising the VOC emission capture system for this emissions unit shall be free of leaks and holes that would permit the escape of the captured VOC emissions.

[Authority for term: OAC rule 3745-77-07(A)(1)]

6. The average, total exhaust flow rate from this emissions unit to the thermal incinerator (oxidizer) shall not be less than 1,522 standard cubic feet per minute (scfm) for the 6-color flexographic printing press PC 3 and 7,233 scfm for the in-line adhesive laminator LAM 2 or shall not be less than the exhaust flow rate documented during the last emission tests that demonstrated the emissions unit was in compliance with the applicable capture efficiency limitation.

[Authority for term: OAC rule 3745-77-07(A)(1)]

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

1. The permittee shall maintain records documenting any time periods when the emissions unit was in operation and the emissions from the emissions unit were not vented to the thermal incinerator (oxidizer).

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator (oxidizer). Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

[Authority for term: OAC rule 3745-77-07(C)(1)]

3. The permittee shall collect and record the following information for each day for the control equipment:

- a. all 3-hour blocks of time (when the emissions unit was in operation) during which the average combustion

temperature within the thermal incinerator (oxidizer) was less than 1550 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance; and

b. a log of operating time for the capture (collection) system, thermal incinerator (oxidizer), monitoring equipment, and the associated emissions unit. The permittee may use recorded temperature data as the log documenting that the monitoring equipment and control device are operating. Bypass of the collection system by the emissions unit shall be logged as to the date and time.

[Authority for term: OAC rule 3745-21-09(B)(3)(l) and OAC rule 3745-77-07(C)(1)]

4. On an annual basis, the permittee shall inspect the electronics of the interlock system used for this emissions unit to verify the signals between the thermal incinerator (oxidizer) and the emissions unit are functioning properly. The permittee shall document the results of all annual inspections. An excursion is defined as a finding that the interlock is inoperative. Any excursion shall require that the process line be immediately shut down and remain shut down until the problem has been corrected.

[Authority for term: OAC rule 3745-77-07(C)(1)]

5. Except as noted below, each calendar quarter, the permittee shall utilize an anemometer, or any other equivalent measurement method approved by the Ohio EPA, to measure the total exhaust flow rate from this emissions unit to the thermal incinerator (oxidizer), in scfm. The anemometer, or other equivalent measurement method approved by the Ohio EPA, shall be capable of accurately measuring the desired parameter and shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee. The measurements shall be taken while this emissions unit and all other printing lines at the facility are in a normal mode of operation. The permittee shall maintain records of the results of all exhaust flow rate measurements.

If the total exhaust flow rate measurements for four consecutive quarters do not identify a deviation of the applicable operational restriction, the permittee may perform the total exhaust flow rate measurements on a semiannual basis. Should the total exhaust flow rate measurements taken on a semiannual basis identify a deviation of the applicable operational restriction, the permittee shall revert to quarterly measurements.

[Authority for term: OAC rule 3745-77-07(C)(1)]

6. Each calendar month, the permittee shall inspect the operational condition and integrity of each ventilation fan comprising the capture system. Ventilation fan observations shall include visual inspections of the fan wheel, belts, and bearings. Lubrication of bearings and replacement of parts shall occur as necessary. The permittee shall document the results of all monthly inspections, including any corrective actions taken.

[Authority for term: OAC rule 3745-77-07(C)(1)]

7. Each calendar month, the permittee shall inspect the operational condition and integrity of all hooding, ductwork, and bypass dampers comprising the capture system. Hooding and ductwork observations shall include visual inspections for leaks or holes. Bypass damper observations shall include visual inspections to verify that the damper setting is in the correct position (i.e., to the thermal incinerator (oxidizer) or to atmosphere) and visual inspections of the actuator and motor to verify that the actuator pin and the motor are operating properly. The permittee shall document the results of all monthly inspections, including any corrective actions taken.

[Authority for term: OAC rule 3745-77-07(C)(1)]

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IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify any time periods when the emissions unit was in operation and the emissions from the emissions unit were not vented to the thermal incinerator (oxidizer). Each report shall be submitted within 30 days after the deviation occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. The permittee shall submit quarterly summaries of the following records:

a. all 3-hour blocks of time (when the emissions unit was in operation) during which the average combustion temperature within the thermal incinerator (oxidizer) was less than 1550 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance; and

b. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

These quarterly summaries shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

[Authority for term: OAC rule 3745-21-09(B)(3)(m) and OAC rule 3745-77-07(C)(1)]

3. The permittee shall submit quarterly deviation (excursion) reports that identify the following events when this emissions unit is utilizing materials that do not meet the VOC content limitations specified in OAC rule 3745-21-09(Y)(1)(a)(i) or (ii):

a. each time the interlock system does not stop the operation of this emissions unit when the thermal incinerator (oxidizer) is not in operation;

b. each average, total exhaust flow rate measurement that does not comply with the operational restriction specified in section A.II.6, based on the records maintained pursuant to section A.III.5 of these terms and conditions, and the magnitude of each deviation; and

c. each time any bypass dampers, actuator pins, and/or associated motors are not in the correct position and in good operating condition and/or any of the hooding or ductwork comprising the VOC emission capture system contains leaks or holes that would permit the escape of the captured VOC emissions.

[Authority for term: OAC rule 3745-77-07(C)(1)]

4. The permittee shall submit annual reports that specify the results of each annual inspection of the electronics of the ventilation fan interlock systems and the thermal incinerator (oxidizer) interlock system, based on the records maintained pursuant to section A.III.4 of these terms and conditions.

[Authority for term: OAC rule 3745-77-07(C)(1)]

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V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted by November 4, 2008 to determine the control efficiency of the thermal incinerator (oxidizer). (Control efficiency testing to demonstrate compliance with the applicable 90 percent control efficiency limitation was performed on November 4, 2003, pursuant to the installation of the thermal incinerator (oxidizer)).

b. The emission testing shall be conducted to demonstrate compliance with the 90 percent, by weight, control efficiency limitation for VOC. (Capture efficiency testing to demonstrate compliance with the applicable 65 percent capture efficiency limitation was performed on January 23-26, 1999.)

c. The test method(s) which must be employed to demonstrate compliance with the capture and control efficiency limitations for VOC are specified below. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Akron RAQMD.

e. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

f. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

g. During each capture efficiency test run, the permittee shall measure the total exhaust flow rate from this emissions unit to the thermal incinerator (oxidizer), in scfm.

[Authority for term: OAC rule 3745-21-10(C) and OAC rule 3745-77-07(C)(1)]

2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Akron RAQMD. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Akron RAQMD's refusal to accept the results of the emission test(s).

[Authority for term: OAC rule 3745-77-07(C)(1)]

3. Personnel from the Akron RAQMD shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

[Authority for term: OAC rule 3745-77-07(C)(1)]

4. A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Akron RAQMD within 30 days following completion of the test (s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Akron RAQMD.

[Authority for term: OAC rule 3745-77-07(C)(1)]

5. Compliance with the emission limitations and control efficiency requirements in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

A control efficiency which is at least 90 percent, by weight, for VOC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing requirements specified in section A.V.1.

[Authority for term: OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

A capture efficiency which is at least 65 percent, by weight, for VOC

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon the emission testing requirements specified in section A.V.1.

[Authority for term: OAC rule 3745-77-07(C)(1)]

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 1677000105 Emissions Unit ID: K006 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **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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2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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

1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 1677000105 Emissions Unit ID: K008 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **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>
K008 - 6-color flexographic printing press with in-line lamination and a backside printing gravure station - WH-2, controlled with a thermal incinerator (oxidizer)	OAC rule 3745-31-05(A)(3) (PTI 16-02184)	85.0 pounds of volatile organic compounds (VOC) per hour (See A.I.2.a below.)
	OAC rule 3745-21-09(Y)(1)(b)	109 tons of VOC per year See A.I.2.b below. The emission control requirements based on this applicable rule are less stringent than or equivalent to the emission control requirements established pursuant to OAC rule 3745-31-05(A)(3).

2. **Additional Terms and Conditions**

- a. The hourly VOC emission limitation is based on the emissions unit's potential to emit. Therefore, no record keeping or reporting is required to demonstrate compliance with this limit.
- (a) [Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]
- b. The printing line shall be equipped with a capture system and associated control system which are designed and operated to achieve a control efficiency which is at least 90 percent, by weight, and a capture efficiency which is at least 78 percent, by weight, for VOC.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]

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II. **Operational Restrictions**

- 1. The VOC emissions from this emissions unit shall be vented to the thermal incinerator (oxidizer) when the emissions unit is in operation.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]
- 2. The average combustion temperature within the thermal incinerator (oxidizer), for any 3-hour block of time, shall not be less than 1550 degrees Fahrenheit or shall not be more than 50 degrees Fahrenheit below the

average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]

3. This emissions unit shall be operated with an interlock system that prevents the operation of this emissions unit when materials not meeting the VOC content limitations specified in OAC rule 3745-21-09(Y)(1)(a)(i) or (ii) are utilized and the thermal incinerator (oxidizer) is not in operation.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]

4. All ventilation fans associated with this emissions unit and the thermal incinerator (oxidizer) shall be in operation at all times when this emissions unit is in operation and utilizing materials that do not meet the VOC content limitations specified in OAC rule 3745-21-09(Y)(1)(a)(i) or (ii).

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]

5. All bypass dampers, actuator pins, and associated motors shall be in the correct position and in good operating condition at all times when this emissions unit is in operation and utilizing materials that do not meet the VOC content limitations specified in OAC rule 3745-21-09(Y)(1)(a)(i) or (ii), to ensure that all captured VOC emissions are vented to the thermal incinerator (oxidizer). Also, all the hooding and ductwork comprising the VOC emission capture system for this emissions unit shall be free of leaks and holes that would permit the escape of the captured VOC emissions.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]

6. The average, total exhaust flow rate from this emissions unit to the thermal incinerator (oxidizer) shall not be less than 3,215 standard cubic feet per minute (scfm) or shall not be less than the exhaust flow rate documented during the last emission tests that demonstrated the emissions unit was in compliance with the applicable capture efficiency limitation.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]

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

1. The permittee shall maintain records documenting any time periods when the emissions unit was in operation and the emissions from the emissions unit were not vented to the thermal incinerator (oxidizer).

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

2. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator (oxidizer). Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

3. The permittee shall collect and record the following information for each day for the control equipment:

- a. all 3-hour blocks of time (when the emissions unit was in operation) during which the average combustion temperature within the thermal incinerator (oxidizer) was less than 1550 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance; and

- b. a log of operating time for the capture (collection) system, thermal incinerator (oxidizer), monitoring equipment, and the associated emissions unit. The permittee may use recorded temperature data as the log documenting that the monitoring equipment and control device are operating. Bypass of the collection system by the emissions unit shall be logged as to the date and time.

[Authority for term: OAC rule 3745-21-09(B)(3)(i), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(C)(1)]

4. On an annual basis, the permittee shall inspect the electronics of the interlock system used for this emissions unit to verify the signals between the thermal incinerator (oxidizer) and the emissions unit are functioning properly. The permittee shall document the results of all annual inspections. An excursion is defined as a finding that the interlock is inoperative. Any excursion shall require that the process line be immediately shut down and remain shut down until the problem has been corrected.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

5. Except as noted below, each calendar quarter, the permittee shall utilize an anemometer, or any other equivalent measurement method approved by the Ohio EPA, to measure the total exhaust flow rate from this emissions unit to the thermal incinerator (oxidizer), in scfm. The anemometer, or other equivalent measurement method approved by the Ohio EPA, shall be capable of accurately measuring the desired parameter and shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee. The measurements shall be taken while this emissions unit and all other printing lines at the facility are in a normal mode of operation. The permittee shall maintain records of the results of all exhaust flow rate measurements.

If the total exhaust flow rate measurements for four consecutive quarters do not identify a deviation of the applicable operational restriction, the permittee may perform the total exhaust flow rate measurements on a

semiannual basis. Should the total exhaust flow rate measurements taken on a semiannual basis identify a deviation of the applicable operational restriction, the permittee shall revert to quarterly measurements.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

6. Each calendar month, the permittee shall inspect the operational condition and integrity of each ventilation fan comprising the capture system. Ventilation fan observations shall include visual inspections of the fan wheel, belts, and bearings. Lubrication of bearings and replacement of parts shall occur as necessary. The permittee shall document the results of all monthly inspections, including any corrective actions taken.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

7. Each calendar month, the permittee shall inspect the operational condition and integrity of all hooding, ductwork, and bypass dampers comprising the capture system. Hooding and ductwork observations shall include visual inspections for leaks or holes. Bypass damper observations shall include visual inspections to verify that the damper setting is in the correct position (i.e., to the thermal incinerator (oxidizer) or to atmosphere) and visual inspections of the actuator and motor to verify that the actuator pin and the motor are operating properly. The permittee shall document the results of all monthly inspections, including any corrective actions taken.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

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IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify any time periods when the emissions unit was in operation and the emissions from the emissions unit were not vented to the thermal incinerator (oxidizer). Each report shall be submitted within 30 days after the deviation occurs.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

2. The permittee shall submit quarterly summaries of the following records:

a. all 3-hour blocks of time (when the emissions unit was in operation) during which the average combustion temperature within the thermal incinerator (oxidizer) was less than 1550 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance; and

b. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

These quarterly summaries shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

[Authority for term: OAC rule 3745-21-09(B)(3)(m), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(C)(1)]

3. The permittee shall submit quarterly deviation (excursion) reports that identify the following events when this emissions unit is utilizing materials that do not meet the VOC content limitations specified in OAC rule 3745-21-09(Y)(1)(a)(i) or (ii):

a. each time the interlock system does not stop the operation of this emissions unit when the thermal incinerator (oxidizer) is not in operation;

b. each average, total exhaust flow rate measurement that does not comply with the operational restriction specified in section A.II.6, based on the records maintained pursuant to section A.III.5 of these terms and conditions, and the magnitude of each deviation; and

c. each time any bypass dampers, actuator pins, and/or associated motors are not in the correct position and in good operating condition and/or any of the hooding or ductwork comprising the VOC emission capture system contains leaks or holes that would permit the escape of the captured VOC emissions.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

4. The permittee shall submit annual reports that specify the results of each annual inspection of the electronics of the ventilation fan interlock systems and the thermal incinerator (oxidizer) interlock system, based on the records maintained pursuant to section A.III.4 of these terms and conditions.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

5. The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

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V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- a. The emission testing shall be conducted by November 4, 2008 to determine the control efficiency of the thermal incinerator (oxidizer). (Control efficiency testing to demonstrate compliance with the applicable 90 percent control efficiency limitation was performed on November 4, 2003, pursuant to the installation of the thermal incinerator (oxidizer)).
- b. The emission testing shall be conducted to demonstrate compliance with the 90 percent, by weight, control efficiency limitation for VOC. (Capture efficiency testing to demonstrate compliance with the applicable 78 percent capture efficiency limitation was performed on January 29, 1999 on emissions unit K003 which is an identical emissions unit to K008.)
- c. The test method(s) which must be employed to demonstrate compliance with the capture and control efficiency limitations for VOC are specified below. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Akron RAQMD.
- e. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)
- f. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
- g. During each capture efficiency test run, the permittee shall measure the total exhaust flow rate from this emissions unit to the thermal incinerator (oxidizer), in scfm.

[Authority for term: OAC rule 3745-21-10(C), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(C)(1)]

2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Akron RAQMD. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Akron RAQMD's refusal to accept the results of the emission test(s).

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

3. Personnel from the Akron RAQMD shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

4. A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Akron RAQMD within 30 days following completion of the test (s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Akron RAQMD.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

5. Compliance with the emission limitations and control efficiency requirements in sections A.1.1 and A.1.2 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

85.0 pounds of VOC per hour

Applicable Compliance Method:

Compliance with this emission limitation has been determined by multiplying the maximum line speed in feet per minute by 60 minutes per hour times the maximum print/coat width in feet times the maximum pounds of VOC per ream times one ream per 3000 square feet times (1-0.7*).

*overall control efficiency based on the capture efficiency requirement of 78%, by weight and the control efficiency requirement of 90%, by weight.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

109 tons of VOC per year

Applicable Compliance Method:

Compliance with this emission limitation shall be determined based upon the records required pursuant to Part II - Specific Facility Terms and Conditions section A.2.b of this permit.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

c. Emission Limitation:

A control efficiency which is at least 90 percent, by weight, for VOC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing requirements specified in section A.V.1.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

d. Emission Limitation:

A capture efficiency which is at least 78 percent, by weight, for VOC

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon the emission testing requirements specified in section A.V.1.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 1677000105 Emissions Unit ID: K008 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **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>
K008 - 6-color flexographic printing press with in-line lamination and a backside printing gravure station - WH-2, controlled with a thermal incinerator (oxidizer)	none	See B.III.1 below.

2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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

1. The permit to install for this emissions unit (K008) was evaluated based on the actual materials (typically

coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the ISCST3 Version 00101 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the ISCST3 Version 00101 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: n-propyl alcohol

TLV (mg/m3): 492

Maximum Hourly Emission Rate (lbs/hr): 194.48*

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 11,628

MAGLC (ug/m3): 11,714

Pollutant: n-propyl acetate

TLV (mg/m3): 835

Maximum Hourly Emission Rate (lbs/hr): 74.26*

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 4,505

MAGLC (ug/m3): 19,881

Pollutant: isopropyl alcohol

TLV (mg/m3): 983

Maximum Hourly Emission Rate (lbs/hr): 100.96*

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 6,222

MAGLC (ug/m3): 23,405

Pollutant: methyl ethyl ketone

TLV (mg/m3): 590

Maximum Hourly Emission Rate (lbs/hr): 43.90**

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 3,081

MAGLC (ug/m3): 14,048

Pollutant: ethyl alcohol

TLV (mg/m3): 1880

Maximum Hourly Emission Rate (lbs/hr): 194.48*

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 12,419

MAGLC (ug/m3): 44,762

Pollutant: ethyl acetate

TLV (mg/m3): 1440

Maximum Hourly Emission Rate (lbs/hr): 276.98*

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 18,351

MAGLC (ug/m3): 34,286

*Combined increase in the allowable emission rate multiplied by the maximum air toxic pollutant weight ratio for emissions units K008, K010, K013, K015, K016, K017, K018, and K020.

**Combined increase in the allowable emission rate multiplied by the maximum air toxic pollutant weight ratio for emissions units K008, K010, K013, K015, K016, and K020.

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.
- The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 1677000105 Emissions Unit ID: K010 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. 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>
K010 - 6-color flexographic printing press with a laminator and a backside printing station - WH-3, controlled with a thermal	OAC rule 3745-31-05(A)(3) (PTI 16-02184)	222.0 pounds of volatile organic compounds (VOC) per hour (See A.I.2.a below.)

incinerator (oxidizer)

109 tons of VOC per year

See A.I.2.b and A.I.2.c below.

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

The emission limitation specified by this rule is equivalent to the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

OAC rule 3745-21-09(Y)(1)(b)

The emission control requirements based on this applicable rule are less stringent than or equivalent to the emission control requirements established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- a. The hourly VOC emission limitation is based on the emissions unit's potential to emit. Therefore, no record keeping or reporting is required to demonstrate compliance with this limit.

(a)

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]

- b. The printing line shall be equipped with a capture system and associated control system which are designed and operated to achieve a control efficiency which is at least 90 percent, by weight, and a capture efficiency which is at least 78 percent, by weight, for VOC.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]

- c. When venting the VOC emissions from the laminator to the atmosphere, the volatile organic compound content of the coatings and inks shall not exceed the following:

i. forty percent VOC by volume of the coating or ink, excluding water and exempt solvents; or

ii. twenty-five percent VOC by volume of the volatile matter in the coating or ink.

[Authority for term: OAC rule 3745-21-09(Y)(1)(a), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(A)(1)]

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II. Operational Restrictions

1. The VOC emissions from the 6-color flexographic printing press and the backside printing station shall be vented to the thermal incinerator (oxidizer) when the emissions unit is in operation.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]

2. When employing a coating on the laminator that meets the requirements of term and condition A.I.2.c above, the VOC emissions from the laminator may be vented to the atmosphere.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]

3. When employing a coating on the laminator that does not meet the requirements of term and condition A.I.2.c above, the VOC emissions shall be vented to the thermal incinerator (oxidizer).

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]

4. The average combustion temperature within the thermal incinerator (oxidizer), for any 3-hour block of time, shall not be less than 1550 degrees Fahrenheit or shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]

5. This emissions unit shall be operated with an interlock system that prevents the operation of this emissions unit when materials not meeting the VOC content limitations specified in OAC rule 3745-21-09(Y)(1)(a)(i) or (ii) are utilized and the thermal incinerator (oxidizer) is not in operation.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]

6. All ventilation fans associated with this emissions unit and the thermal incinerator (oxidizer) shall be in operation at all times when this emissions unit is in operation and utilizing materials that do not meet the VOC content limitations specified in OAC rule 3745-21-09(Y)(1)(a)(i) or (ii).

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]

7. All bypass dampers, actuator pins, and associated motors shall be in the correct position and in good operating condition at all times when this emissions unit is in operation and utilizing materials that do not meet the VOC content limitations specified in OAC rule 3745-21-09(Y)(1)(a)(i) or (ii), to ensure that all captured VOC emissions are vented to the thermal incinerator (oxidizer). Also, all the hooding and ductwork comprising the VOC emission capture system for this emissions unit shall be free of leaks and holes that would permit the escape of the captured VOC emissions.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]

8. The average, total exhaust flow rate from this emissions unit to the thermal incinerator (oxidizer) shall not be

less than 8,147 standard cubic feet per minute (scfm) or shall not be less than the exhaust flow rate documented during the last emission tests that demonstrated the emissions unit was in compliance with the applicable capture efficiency limitation.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain records documenting any time periods when the emissions unit was in operation and the emissions from the emissions unit were not vented to the thermal incinerator (oxidizer) except for time periods when the emissions from the laminator are vented to the atmosphere as allowed by term and condition A.1.2.c and the emissions from the 6-color flexographic printing press and the backside printing press are vented to the thermal incinerator (oxidizer).

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

2. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator (oxidizer). Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

3. The permittee shall collect and record the following information for each day for the control equipment:
 - a. all 3-hour blocks of time (when the emissions unit was in operation) during which the average combustion temperature within the thermal incinerator (oxidizer) was less than 1550 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance; and
 - b. a log of operating time for the capture (collection) system, thermal incinerator (oxidizer), monitoring equipment, and the associated emissions unit. The permittee may use recorded temperature data as the log documenting that the monitoring equipment and control device are operating. Bypass of the collection system by the emissions unit shall be logged as to the date and time.

[Authority for term: OAC rule 3745-21-09(B)(3)(l), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(C)(1)]

4. On an annual basis, the permittee shall inspect the electronics of the interlock system used for this emissions unit to verify the signals between the thermal incinerator (oxidizer) and the emissions unit are functioning properly. The permittee shall document the results of all annual inspections. An excursion is defined as a finding that the interlock is inoperative. Any excursion shall require that the process line be immediately shut down and remain shut down until the problem has been corrected.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

5. Except as noted below, each calendar quarter, the permittee shall utilize an anemometer, or any other equivalent measurement method approved by the Ohio EPA, to measure the total exhaust flow rate from this emissions unit to the thermal incinerator (oxidizer), in scfm. The anemometer, or other equivalent measurement method approved by the Ohio EPA, shall be capable of accurately measuring the desired parameter and shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee. The measurements shall be taken while this emissions unit and all other printing lines at the facility are in a normal mode of operation. The permittee shall maintain records of the results of all exhaust flow rate measurements.

If the total exhaust flow rate measurements for four consecutive quarters do not identify a deviation of the applicable operational restriction, the permittee may perform the total exhaust flow rate measurements on a semiannual basis. Should the total exhaust flow rate measurements taken on a semiannual basis identify a deviation of the applicable operational restriction, the permittee shall revert to quarterly measurements.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

6. Each calendar month, the permittee shall inspect the operational condition and integrity of each ventilation fan comprising the capture system. Ventilation fan observations shall include visual inspections of the fan wheel, belts, and bearings. Lubrication of bearings and replacement of parts shall occur as necessary. The permittee shall document the results of all monthly inspections, including any corrective actions taken.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

7. Each calendar month, the permittee shall inspect the operational condition and integrity of all hooding, ductwork, and bypass dampers comprising the capture system. Hooding and ductwork observations shall include visual inspections for leaks or holes. Bypass damper observations shall include visual inspections to verify that the damper setting is in the correct position (i.e., to the thermal incinerator (oxidizer) or to atmosphere) and visual inspections of the actuator and motor to verify that the actuator pin and the motor are operating properly. The permittee shall document the results of all monthly inspections, including any corrective actions taken.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

8. The permittee shall collect and record the following information each month for the coatings employed on the laminator that are vented to the atmosphere:

- a. the name and identification number of each coating and ink, as applied; and
- b. the VOC content in percentage VOC by volume of each coating and ink (excluding water and exempt solvents); or
- c. the VOC content in percentage VOC by volume of the volatile matter in each coating and ink.

(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.)

[Authority for term: OAC rule 3745-21-09(B)(3)(f), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(C)(1)]

- 9. If a job specification calls for a coating to be employed on the laminator that does not comply with the requirements of term and condition A.I.2.c, then the permittee shall maintain the following information in a log:
 - a. the date;
 - b. confirmation that the VOC emissions from the noncomplying coatings were diverted to the thermal incinerator (oxidizer); and
 - c. the personnel initials.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

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IV. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports that identify any time periods when the emissions unit was in operation and the emissions from the emissions unit were not vented to the thermal incinerator (oxidizer) except for time periods when the emissions from the laminator are vented to the atmosphere as allowed by term and condition A.I.2.c and the emissions from the 6-color flexographic printing press and the backside printing press are vented to the thermal incinerator (oxidizer). Each report shall be submitted within 30 days after the deviation occurs.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

- 2. The permittee shall submit quarterly summaries of the following records:
 - a. all 3-hour blocks of time (when the emissions unit was in operation) during which the average combustion temperature within the thermal incinerator (oxidizer) was less than 1550 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance; and
 - b. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

These quarterly summaries shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

[Authority for term: OAC rule 3745-21-09(B)(3)(m), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(C)(1)]

- 3. The permittee shall submit quarterly deviation (excursion) reports that identify the following events when this emissions unit is utilizing materials that do not meet the VOC content limitations specified in OAC rule 3745-21-09(Y)(1)(a)(i) or (ii):
 - a. each time the interlock system does not stop the operation of this emissions unit when the thermal incinerator (oxidizer) is not in operation;
 - b. each average, total exhaust flow rate measurement that does not comply with the operational restriction specified in section A.II.8, based on the records maintained pursuant to section A.III.5 of these terms and conditions, and the magnitude of each deviation; and
 - c. each time any bypass dampers, actuator pins, and/or associated motors are not in the correct position and in good operating condition and/or any of the hooding or ductwork comprising the VOC emission capture system contains leaks or holes that would permit the escape of the captured VOC emissions.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

- 4. The permittee shall submit annual reports that specify the results of each annual inspection of the electronics of the ventilation fan interlock systems and the thermal incinerator (oxidizer) interlock system, based on the records maintained pursuant to section A.III.4 of these terms and conditions.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

- 5. The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

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V. **Testing Requirements**

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted by November 4, 2008 to determine the control efficiency of the thermal incinerator (oxidizer). (Control efficiency testing to demonstrate compliance with the applicable 90 percent control efficiency limitation was performed on November 4, 2003, pursuant to the installation of the thermal incinerator (oxidizer)).
 - b. The emission testing shall be conducted to demonstrate compliance with the 90 percent, by weight, control efficiency limitation for VOC. (Capture efficiency testing to demonstrate compliance with the applicable 78 percent capture efficiency limitation was performed on January 27-28, 1999.)
 - c. The test method(s) which must be employed to demonstrate compliance with the capture and control efficiency limitations for VOC are specified below. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
 - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Akron RAQMD.
 - e. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)
 - f. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
 - g. During each capture efficiency test run, the permittee shall measure the total exhaust flow rate from this emissions unit to the thermal incinerator (oxidizer), in scfm.

[Authority for term: OAC rule 3745-21-10(C), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(C)(1)]

2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Akron RAQMD. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Akron RAQMD's refusal to accept the results of the emission test(s).

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

3. Personnel from the Akron RAQMD shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

4. A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Akron RAQMD within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Akron RAQMD.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

5. Compliance with the emission limitations and control efficiency requirements in sections A.1.1 and A.1.2 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

222.0 pounds of VOC per hour

Applicable Compliance Method:

Compliance with this emission limitation has been determined by multiplying the maximum line speed in feet per minute by 60 minutes per hour times the maximum print/coat width in feet times the maximum pounds of VOC per ream times one ream per 3000 square feet times (1-0.7*).

*overall control efficiency based on the capture efficiency requirement of 78%, by weight and the control efficiency requirement of 90%, by weight.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

109 tons of VOC per year

Applicable Compliance Method:

Compliance with this emission limitation shall be determined based upon the records required pursuant to Part II - Specific Facility Terms and Conditions sections A.2.b and A.2.c of this permit.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

c. Emission Limitation:

forty percent VOC by volume of the coating and ink, excluding water and exempt solvents or twenty-five percent VOC by volume of the volatile matter in the coating and ink

Applicable Compliance Method:

OAC rule 3745-21-10(B). 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 11.4 of Method 24, 40 CFR Part 60, Appendix A, the permittee 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.

[Authority for term: OAC rule 3745-21-10(B), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(C)(1)]

d. Emission Limitation:

A control efficiency which is at least 90 percent, by weight, for VOC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing requirements specified in section A.V.1.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

e. Emission Limitation:

A capture efficiency which is at least 78 percent, by weight, for VOC

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon the emission testing requirements specified in section A.V.1.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 1677000105 Emissions Unit ID: K010 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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

- 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>
K010 - 6-color flexographic printing press with a laminator and a backside printing station - WH-3, controlled with a thermal incinerator (oxidizer)	none	See B.III.1 below.

2. **Additional Terms and Conditions**

- None

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II. **Operational Restrictions**

- None

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

- The permit to install for this emissions unit (K010) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the ISCST3 Version 00101 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the ISCST3 Version 00101 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: n-propyl alcohol

TLV (mg/m3): 492

Maximum Hourly Emission Rate (lbs/hr): 194.48*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 11,628

MAGLC (ug/m3): 11,714

Pollutant: n-propyl acetate

TLV (mg/m3): 835

Maximum Hourly Emission Rate (lbs/hr): 74.26*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 4,505

MAGLC (ug/m3): 19,881

Pollutant: isopropyl alcohol

TLV (mg/m3): 983

Maximum Hourly Emission Rate (lbs/hr): 100.96*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 6,222

MAGLC (ug/m3): 23,405

Pollutant: methyl ethyl ketone

TLV (mg/m3): 590

Maximum Hourly Emission Rate (lbs/hr): 43.90**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3,081

MAGLC (ug/m3): 14,048

Pollutant: ethyl alcohol

TLV (mg/m3): 1880

Maximum Hourly Emission Rate (lbs/hr): 194.48*

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 12,419

MAGLC (ug/m3): 44,762

Pollutant: ethyl acetate

TLV (mg/m3): 1440

Maximum Hourly Emission Rate (lbs/hr): 276.98*
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 18,351

MAGLC (ug/m3): 34,286

*Combined increase in the allowable emission rate multiplied by the maximum air toxic pollutant weight ratio for emissions units K008, K010, K013, K015, K016, K017, K018, and K020.

**Combined increase in the allowable emission rate multiplied by the maximum air toxic pollutant weight ratio for emissions units K008, K010, K013, K015, K016, and K020.

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None

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Facility ID: 1677000105 Emissions Unit ID: K013 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. 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>
K013 - 6-color flexographic printing press with in-line lamination - WH-IV, controlled with a thermal incinerator (oxidizer)	OAC rule 3745-31-05(A)(3) (PTI 16-02184)	100.0 pounds of volatile organic compounds (VOC) per hour (See A.I.2.a below.) 109 tons of VOC per year
	OAC rule 3745-21-09(Y)(1)(b)	See A.I.2.b below. The emission control requirements based on this applicable rule are less stringent than or equivalent to the emission control requirements established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- a. The hourly VOC emission limitation is based on the emissions unit's potential to emit. Therefore, no record keeping or reporting is required to demonstrate compliance with this limit.
- (a) [Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]
- b. The printing line shall be equipped with a capture system and associated control system which are designed and operated to achieve a control efficiency which is at least 90 percent, by weight, and a capture efficiency which is at least 78 percent, by weight, for VOC.
[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]

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II. Operational Restrictions

1. The VOC emissions from this emissions unit shall be vented to the thermal incinerator (oxidizer) when the emissions unit is in operation.
[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]
2. The average combustion temperature within the thermal incinerator (oxidizer), for any 3-hour block of time, shall not be less than 1550 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance.
[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]
3. This emissions unit shall be operated with an interlock system that prevents the operation of this emissions unit when materials not meeting the VOC content limitations specified in OAC rule 3745-21-09(Y)(1)(a)(i) or (ii) are utilized and the thermal incinerator (oxidizer) is not in operation.
[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]
4. All ventilation fans associated with this emissions unit and the thermal incinerator (oxidizer) shall be in operation at all times when this emissions unit is in operation and utilizing materials that do not meet the VOC content limitations specified in OAC rule 3745-21-09(Y)(1)(a)(i) or (ii).
[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]
5. All bypass dampers, actuator pins, and associated motors shall be in the correct position and in good operating condition at all times when this emissions unit is in operation and utilizing materials that do not meet the VOC content limitations specified in OAC rule 3745-21-09(Y)(1)(a)(i) or (ii), to ensure that all captured VOC emissions are vented to the thermal incinerator (oxidizer). Also, all the hooding and ductwork

comprising the VOC emission capture system for this emissions unit shall be free of leaks and holes that would permit the escape of the captured VOC emissions.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]

6. The average, total exhaust flow rate from this emissions unit to the thermal incinerator (oxidizer) shall not be less than 1,738 standard cubic feet per minute (scfm) or shall not be less than the exhaust flow rate documented during the last emission tests that demonstrated the emissions unit was in compliance with the applicable capture efficiency limitation.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain records documenting any time periods when the emissions unit was in operation and the emissions from the emissions unit were not vented to the thermal incinerator (oxidizer).

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

2. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator (oxidizer). Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

3. The permittee shall collect and record the following information for each day for the control equipment:

a. all 3-hour blocks of time (when the emissions unit was in operation) during which the average combustion temperature within the thermal incinerator (oxidizer) was less than 1550 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance; and

b. a log of operating time for the capture (collection) system, thermal incinerator (oxidizer), monitoring equipment, and the associated emissions unit. The permittee may use recorded temperature data as the log documenting that the monitoring equipment and control device are operating. Bypass of the collection system by the emissions unit shall be logged as to the date and time.

[Authority for term: OAC rule 3745-21-09(B)(3)(i), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(C)(1)]

4. On an annual basis, the permittee shall inspect the electronics of the interlock system used for this emissions unit to verify the signals between the thermal incinerator (oxidizer) and the emissions unit are functioning properly. The permittee shall document the results of all annual inspections. An excursion is defined as a finding that the interlock is inoperative. Any excursion shall require that the process line be immediately shut down and remain shut down until the problem has been corrected.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

5. Except as noted below, each calendar quarter, the permittee shall utilize an anemometer, or any other equivalent measurement method approved by the Ohio EPA, to measure the total exhaust flow rate from this emissions unit to the thermal incinerator (oxidizer), in scfm. The anemometer, or other equivalent measurement method approved by the Ohio EPA, shall be capable of accurately measuring the desired parameter and shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee. The measurements shall be taken while this emissions unit and all other printing lines at the facility are in a normal mode of operation. The permittee shall maintain records of the results of all exhaust flow rate measurements.

If the total exhaust flow rate measurements for four consecutive quarters do not identify a deviation of the applicable operational restriction, the permittee may perform the total exhaust flow rate measurements on a semiannual basis. Should the total exhaust flow rate measurements taken on a semiannual basis identify a deviation of the applicable operational restriction, the permittee shall revert to quarterly measurements.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

6. Each calendar month, the permittee shall inspect the operational condition and integrity of each ventilation fan comprising the capture system. Ventilation fan observations shall include visual inspections of the fan wheel, belts, and bearings. Lubrication of bearings and replacement of parts shall occur as necessary. The permittee shall document the results of all monthly inspections, including any corrective actions taken.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

7. Each calendar month, the permittee shall inspect the operational condition and integrity of all hooding, ductwork, and bypass dampers comprising the capture system. Hooding and ductwork observations shall include visual inspections for leaks or holes. Bypass damper observations shall include visual inspections to verify that the damper setting is in the correct position (i.e., to the thermal incinerator (oxidizer) or to atmosphere) and visual inspections of the actuator and motor to verify that the actuator pin and the motor are operating properly. The permittee shall document the results of all monthly inspections, including any corrective actions taken.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

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IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify any time periods when the emissions unit was in operation and the emissions from the emissions unit were not vented to the thermal incinerator (oxidizer). Each report shall be submitted within 30 days after the deviation occurs.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]
2. The permittee shall submit quarterly summaries of the following records:
 - a. all 3-hour blocks of time (when the emissions unit was in operation) during which the average combustion temperature within the thermal incinerator (oxidizer) was less than 1550 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance; and
 - b. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.These quarterly summaries shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

[Authority for term: OAC rule 3745-21-09(B)(3)(m), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(C)(1)]
3. The permittee shall submit quarterly deviation (excursion) reports that identify the following events when this emissions unit is utilizing materials that do not meet the VOC content limitations specified in OAC rule 3745-21-09(Y)(1)(a)(i) or (ii):
 - a. each time the interlock system does not stop the operation of this emissions unit when the thermal incinerator (oxidizer) is not in operation;
 - b. each average, total exhaust flow rate measurement that does not comply with the operational restriction specified in section A.II.6, based on the records maintained pursuant to section A.III.5 of these terms and conditions, and the magnitude of each deviation; and
 - c. each time any bypass dampers, actuator pins, and/or associated motors are not in the correct position and in good operating condition and/or any of the hooding or ductwork comprising the VOC emission capture system contains leaks or holes that would permit the escape of the captured VOC emissions.[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]
4. The permittee shall submit annual reports that specify the results of each annual inspection of the electronics of the ventilation fan interlock systems and the thermal incinerator (oxidizer) interlock system, based on the records maintained pursuant to section A.III.4 of these terms and conditions.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]
5. The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

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V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted by November 4, 2008 to determine the control efficiency of the thermal incinerator (oxidizer). (Control efficiency testing to demonstrate compliance with the applicable 90 percent control efficiency limitation was performed on November 4, 2003, pursuant to the installation of the thermal incinerator (oxidizer)).
 - b. The emission testing shall be conducted to demonstrate compliance with the 90 percent, by weight control efficiency limitation for VOC. (Capture efficiency testing to demonstrate compliance with the applicable 78 percent capture efficiency limitation was performed on January 21-22, 1999.)
 - c. The test method(s) which must be employed to demonstrate compliance with the capture and control efficiency limitations for VOC are specified below. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
 - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Akron RAQMD.
 - e. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such

approval does not contravene any other applicable requirement.)

f. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

g. During each capture efficiency test run, the permittee shall measure the total exhaust flow rate from this emissions unit to the thermal incinerator (oxidizer), in scfm.

[Authority for term: OAC rule 3745-21-10(C), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(C)(1)]

2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Akron RAQMD. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Akron RAQMD's refusal to accept the results of the emission test(s).

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

3. Personnel from the Akron RAQMD shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

4. A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Akron RAQMD within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Akron RAQMD.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

5. Compliance with the emission limitations and control efficiency requirements in sections A.1.1 and A.1.2 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

100.0 pounds of VOC per hour

Applicable Compliance Method:

Compliance with this emission limitation has been determined by multiplying the maximum line speed in feet per minute by 60 minutes per hour times the maximum print/coat width in feet times the maximum pounds of VOC per ream times one ream per 3000 square feet times (1-0.7*).

*overall control efficiency based on the capture efficiency requirement of 78%, by weight and the control efficiency requirement of 90%, by weight.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

- b. Emission Limitation:

109 tons of VOC per year

Applicable Compliance Method:

Compliance with this emission limitation shall be determined based upon the records required pursuant to Part II - Specific Facility Terms and Conditions section A.2.b of this permit.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

- c. Emission Limitation:

A control efficiency which is at least 90 percent, by weight, for VOC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing requirements specified in section A.V.1.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

- d. Emission Limitation:

A capture efficiency which is at least 78 percent, by weight, for VOC

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon the emission testing requirements specified in section A.V.1.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 1677000105 Emissions Unit ID: K013 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **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>
K013 - 6-color flexographic printing press with in-line lamination - WH-IV, controlled with a thermal incinerator (oxidizer)	none	See B.III.1 below.

2. **Additional Terms and Conditions**

- 1. None

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II. **Operational Restrictions**

- 1. None

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

- 1. The permit to install for this emissions unit (K013) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the ISCST3 Version 00101 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the ISCST3 Version 00101 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: n-propyl alcohol

TLV (mg/m3): 492

Maximum Hourly Emission Rate (lbs/hr): 194.48*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 11,628

MAGLC (ug/m3): 11,714

Pollutant: n-propyl acetate

TLV (mg/m3): 835

Maximum Hourly Emission Rate (lbs/hr): 74.26*

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 4,505

MAGLC (ug/m3): 19,881

Pollutant: isopropyl alcohol

TLV (mg/m3): 983

Maximum Hourly Emission Rate (lbs/hr): 100.96*

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 6,222

MAGLC (ug/m3): 23,405

Pollutant: methyl ethyl ketone

TLV (mg/m3): 590

Maximum Hourly Emission Rate (lbs/hr): 43.90**

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 3,081

MAGLC (ug/m3): 14,048

Pollutant: ethyl alcohol

TLV (mg/m3): 1880

Maximum Hourly Emission Rate (lbs/hr): 194.48*

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 12,419

MAGLC (ug/m3): 44,762

Pollutant: ethyl acetate

TLV (mg/m3): 1440

Maximum Hourly Emission Rate (lbs/hr): 276.98*

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 18,351

MAGLC (ug/m3): 34,286

*Combined increase in the allowable emission rate multiplied by the maximum air toxic pollutant weight ratio for emissions units K008, K010, K013, K015, K016, K017, K018, and K020.

**Combined increase in the allowable emission rate multiplied by the maximum air toxic pollutant weight ratio for emissions units K008, K010, K013, K015, K016, and K020.

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 1677000105 Emissions Unit ID: K016 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. 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>
K016 - 8-color flexographic printing press with a one color outboard flexographic station - PC VISION, controlled with a thermal oxidizer	OAC rule 3745-31-05(A)(3) (PTI 16-02184)	34.0 pounds of volatile organic compounds (VOC) per hour (See A.I.2.a below.)
		109 tons of VOC per year
	OAC rule 3745-21-09(Y)(1)(b)	See A.I.2.b below. The emission control requirements based on this applicable rule are less stringent than or equivalent to the emission control requirements established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- a. The hourly VOC emission limitation is based on the emissions unit's potential to emit. Therefore, no record keeping or reporting is required to demonstrate compliance with this limit.

(a) [Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]

- b. The printing line shall be equipped with a capture system and associated control system which are designed and operated to achieve a control efficiency which is at least 90 percent, by weight, and a capture efficiency which is at least 78 percent, by weight, for VOC.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]

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II. Operational Restrictions

1. The VOC emissions from this emissions unit shall be vented to the thermal incinerator (oxidizer) when the emissions unit is in operation.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]
2. The average combustion temperature within the thermal incinerator (oxidizer), for any 3-hour block of time, shall not be less than 1550 degrees Fahrenheit or shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]
3. This emissions unit shall be operated with an interlock system that prevents the operation of this emissions unit when materials not meeting the VOC content limitations specified in OAC rule 3745-21-09(Y)(1)(a)(i) or (ii) are utilized and the thermal incinerator (oxidizer) is not in operation.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]
4. All ventilation fans associated with this emissions unit and the thermal incinerator (oxidizer) shall be in operation at all times when this emissions unit is in operation and utilizing materials that do not meet the VOC content limitations specified in OAC rule 3745-21-09(Y)(1)(a)(i) or (ii).

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]
5. All bypass dampers, actuator pins, and associated motors shall be in the correct position and in good operating condition at all times when this emissions unit is in operation and utilizing materials that do not meet the VOC content limitations specified in OAC rule 3745-21-09(Y)(1)(a)(i) or (ii), to ensure that all captured VOC emissions are vented to the thermal incinerator (oxidizer). Also, all the hooding and ductwork comprising the VOC emission capture system for this emissions unit shall be free of leaks and holes that would permit the escape of the captured VOC emissions.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]
6. The average, total exhaust flow rate from this emissions unit to the thermal incinerator (oxidizer) shall not be less than 1,761 standard cubic feet per minute (scfm) or shall not be less than the exhaust flow rate documented during the last emission tests that demonstrated the emissions unit was in compliance with the applicable capture efficiency limitation.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain records documenting any time periods when the emissions unit was in operation and the emissions from the emissions unit were not vented to the thermal incinerator (oxidizer).

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]
2. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator (oxidizer). Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]
3. The permittee shall collect and record the following information for each day for the control equipment:
 - a. all 3-hour blocks of time (when the emissions unit was in operation) during which the average combustion temperature within the thermal incinerator (oxidizer) was less than 1550 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance; and
 - b. a log of operating time for the capture (collection) system, thermal incinerator (oxidizer), monitoring equipment, and the associated emissions unit. The permittee may use recorded temperature data as the log documenting that the monitoring equipment and control device are operating. Bypass of the collection system by the emissions unit shall be logged as to the date and time.
[Authority for term: OAC rule 3745-21-09(B)(3)(l), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(C)(1)]
4. On an annual basis, the permittee shall inspect the electronics of the interlock system used for this emissions unit to verify the signals between the thermal incinerator (oxidizer) and the emissions unit are functioning properly. The permittee shall document the results of all annual inspections. An excursion is defined as a finding that the interlock is inoperative. Any excursion shall require that the process line be immediately shut down and remain shut down until the problem has been corrected.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

5. Except as noted below, each calendar quarter, the permittee shall utilize an anemometer, or any other equivalent measurement method approved by the Ohio EPA, to measure the total exhaust flow rate from this emissions unit to the thermal incinerator (oxidizer), in scfm. The anemometer, or other equivalent measurement method approved by the Ohio EPA, shall be capable of accurately measuring the desired parameter and shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee. The measurements shall be taken while this emissions unit and all other printing lines at the facility are in a normal mode of operation. The permittee shall maintain records of the results of all exhaust flow rate measurements.

If the total exhaust flow rate measurements for four consecutive quarters do not identify a deviation of the applicable operational restriction, the permittee may perform the total exhaust flow rate measurements on a semiannual basis. Should the total exhaust flow rate measurements taken on a semiannual basis identify a deviation of the applicable operational restriction, the permittee shall revert to quarterly measurements.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

6. Each calendar month, the permittee shall inspect the operational condition and integrity of each ventilation fan comprising the capture system. Ventilation fan observations shall include visual inspections of the fan wheel, belts, and bearings. Lubrication of bearings and replacement of parts shall occur as necessary. The permittee shall document the results of all monthly inspections, including any corrective actions taken.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

7. Each calendar month, the permittee shall inspect the operational condition and integrity of all hooding, ductwork, and bypass dampers comprising the capture system. Hooding and ductwork observations shall include visual inspections for leaks or holes. Bypass damper observations shall include visual inspections to verify that the damper setting is in the correct position (i.e., to the thermal incinerator (oxidizer) or to atmosphere) and visual inspections of the actuator and motor to verify that the actuator pin and the motor are operating properly. The permittee shall document the results of all monthly inspections, including any corrective actions taken.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

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IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify any time periods when the emissions unit was in operation and the emissions from the emissions unit were not vented to the thermal incinerator (oxidizer). Each report shall be submitted within 30 days after the deviation occurs.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

2. The permittee shall submit quarterly summaries of the following records:
 - a. all 3-hour blocks of time (when the emissions unit was in operation) during which the average combustion temperature within the thermal incinerator (oxidizer) was less than 1550 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance; and
 - b. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

These quarterly summaries shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

[Authority for term: OAC rule 3745-21-09(B)(3)(m), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(C)(1)]

3. The permittee shall submit quarterly deviation (excursion) reports that identify the following events when this emissions unit is utilizing materials that do not meet the VOC content limitations specified in OAC rule 3745-21-09(Y)(1)(a)(i) or (ii):
 - a. each time the interlock system does not stop the operation of this emissions unit when the thermal incinerator (oxidizer) is not in operation;
 - b. each average, total exhaust flow rate measurement that does not comply with the operational restriction specified in section A.II.6, based on the records maintained pursuant to section A.III.5 of these terms and conditions, and the magnitude of each deviation; and
 - c. each time any bypass dampers, actuator pins, and/or associated motors are not in the correct position and in good operating condition and/or any of the hooding or ductwork comprising the VOC emission capture system contains leaks or holes that would permit the escape of the captured VOC emissions.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

4. The permittee shall submit annual reports that specify the results of each annual inspection of the electronics of the ventilation fan interlock systems and the thermal incinerator (oxidizer) interlock system, based on the records maintained pursuant to section A.III.4 of these terms and conditions.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

5. The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

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V. **Testing Requirements**

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted by November 4, 2008 to determine the control efficiency of the thermal incinerator (oxidizer). (Control efficiency testing to demonstrate compliance with the applicable 90 percent control efficiency limitation was performed on November 4, 2003, pursuant to the installation of the thermal incinerator (oxidizer)).

b. The emission testing shall be conducted to demonstrate compliance with the 90 percent, by weight control efficiency limitation for VOC. (Capture efficiency testing to demonstrate compliance with the applicable 78 percent efficiency limitation was performed on January 31 - February 1, 1999.)

c. The test method(s) which must be employed to demonstrate compliance with the capture and control efficiency limitations for VOC are specified below. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Akron RAQMD.

e. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

f. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

g. During each capture efficiency test run, the permittee shall measure the total exhaust flow rate from this emissions unit to the thermal incinerator (oxidizer), in scfm.

[Authority for term: OAC rule 3745-21-10(C), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(C)(1)]

2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Akron RAQMD. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Akron RAQMD's refusal to accept the results of the emission test(s).

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

3. Personnel from the Akron RAQMD shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

4. A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Akron RAQMD within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Akron RAQMD.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

5. Compliance with the emission limitations and control efficiency requirements in sections A.1.1 and A.1.2 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

34.0 pounds of VOC per hour

Applicable Compliance Method:

Compliance with this emission limitation has been determined by multiplying the maximum line speed in feet per minute by 60 minutes per hour times the maximum print/coat width in feet times the maximum pounds of VOC per ream times one ream per 3000 square feet times (1-0.7*).

*overall control efficiency based on the capture efficiency requirement of 78%, by weight and the control efficiency requirement of 90%, by weight.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

109 tons of VOC per year

Applicable Compliance Method:

Compliance with this emission limitation shall be determined based upon the records required pursuant to Part II - Specific Facility Terms and Conditions section A.2.b of this permit.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

c. Emission Limitation:

A control efficiency which is at least 90 percent, by weight, for VOC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing requirements specified in section A.V.1.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

d. Emission Limitation:

A capture efficiency which is at least 78 percent, by weight, for VOC

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon the emission testing requirements specified in section A.V.1.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 1677000105 Issuance type: Title V Proposed Permit

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Facility ID: 1677000105 Emissions Unit ID: K016 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. 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>
K016 - 8-color flexographic printing press with a one color outboard flexographic station - PC VISION, controlled with a thermal oxidizer	none	See B.III.1 below.

2. Additional Terms and Conditions

- 1. None

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II. **Operational Restrictions**

1. None

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

1. The permit to install for this emissions unit (K016) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the ISCST3 Version 00101 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the ISCST3 Version 00101 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: n-propyl alcohol

TLV (mg/m3): 492

Maximum Hourly Emission Rate (lbs/hr): 194.48*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 11,628

MAGLC (ug/m3): 11,714

Pollutant: n-propyl acetate

TLV (mg/m3): 835

Maximum Hourly Emission Rate (lbs/hr): 74.26*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 4,505

MAGLC (ug/m3): 19,881

Pollutant: isopropyl alcohol

TLV (mg/m3): 983

Maximum Hourly Emission Rate (lbs/hr): 100.96*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 6,222

MAGLC (ug/m3): 23,405

Pollutant: methyl ethyl ketone

TLV (mg/m3): 590

Maximum Hourly Emission Rate (lbs/hr): 43.90**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3,081

MAGLC (ug/m3): 14,048

Pollutant: ethyl alcohol

TLV (mg/m3): 1880

Maximum Hourly Emission Rate (lbs/hr): 194.48*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 12,419

MAGLC (ug/m3): 44,762

Pollutant: ethyl acetate

TLV (mg/m3): 1440

Maximum Hourly Emission Rate (lbs/hr): 276.98*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 18,351

MAGLC (ug/m3): 34,286

*Combined increase in the allowable emission rate multiplied by the maximum air toxic pollutant weight ratio for emissions units K008, K010, K013, K015, K016, K017, K018, and K020.

**Combined increase in the allowable emission rate multiplied by the maximum air toxic pollutant weight ratio for emissions units K008, K010, K013, K015, K016, and K020.

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None

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Facility ID: 1677000105 Issuance type: Title V Proposed Permit

Part III - Terms and Conditions for Emissions Units

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Facility ID: 1677000105 Emissions Unit ID: K017 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. 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>
9-color narrow flexographic printing press and laminator - Comco II.	OAC rule 3745-31-05(A)(3) (PTI 16-02184)	10.0 pounds of volatile organic compounds (VOC) per hour 10.0 tons of VOC per year The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(Y)(1)(a). (a). See A.I.2.a below.
	OAC rule 3745-21-09(Y)(1)(a)	

2. Additional Terms and Conditions

- a. The volatile organic compound content of the coatings and inks shall not exceed the following limitations:
- (a)
- a. forty percent VOC by volume of the coating or ink, excluding water and exempt solvents; or
- b. twenty-five percent VOC by volume of the volatile matter in the coating or ink.
- [Authority for term: OAC rule 3745-21-09(Y)(1)(a) and OAC rule 3745-31-05(A)(3)]
- b. The hourly VOC emission limitation is based on the emissions unit's potential to emit. Therefore, no record keeping or reporting is required to demonstrate compliance with this limit.
- [Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for the line:
- a. the name and identification number of each coating and ink, as applied; and
- b. the VOC content in percentage VOC by volume of each coating and ink (excluding water and exempt solvents); or
- c. the VOC content in percentage VOC by volume of the volatile matter in each coating and ink.
- (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.)
- [Authority for term: OAC rule 3745-21-09(B)(3)(f), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(C)(1)]
2. The permittee shall maintain monthly records of the following information:
- a. the linear feet of material produced by this emissions unit;
- b. the total linear feet of material produced by all of the emissions units that do not employ control equipment;
- c. the average, uncontrolled VOC emission rate for this emissions unit, in tons per month (A.III.2.a divided by A.III.2.b, and then multiplied by A.2.a.xi of Part II - Specific Facility Terms and Conditions).
- [Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

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IV. Reporting Requirements

1. The permittee shall notify the Akron RAQMD in writing of any monthly record showing the use of noncomplying coatings (for VOC content). The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 30 days following the end of the calendar month.

[Authority for term: OAC rule 3745-21-09(B)(3)(g), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(C)(1)]

2. The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

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V. **Testing Requirements**

1. Compliance with the emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

forty percent VOC by volume of the coating and ink, excluding water and exempt solvents or twenty-five percent VOC by volume of the volatile matter in the coating and ink

Applicable Compliance Method:

OAC rule 3745-21-10(B). 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 11.4 of Method 24, 40 CFR Part 60, Appendix A, the permittee 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.

[Authority for term: OAC rule 3745-21-10(B), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

10.0 pounds of VOC per hour

Applicable Compliance Method:

Compliance with this emission limitation has been determined by multiplying the maximum line speed in feet per minute by 60 minutes per hour times the maximum print/coat width in feet times the maximum pounds of VOC per ream times one ream per 3000 square feet.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

c. Emission Limitation:

10.0 tons of VOC per year

Applicable Compliance Method:

Compliance with this emission limitation shall be determined based upon the records required pursuant to Part II - Specific Facility Terms and Conditions section A.2.a of this permit and section A.III.2 above.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 1677000105 Issuance type: Title V Proposed Permit

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Facility ID: 1677000105 Emissions Unit ID: K017 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under

state law only.

1. None.

I. 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
9-color narrow flexographic printing press and laminator - Comco II.	none	See B.III.1 below.
2. Additional Terms and Conditions		
1. None		

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permit to install for this emissions unit (K017) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the ISCST3 Version 00101 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the ISCST3 Version 00101 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: n-propyl alcohol

TLV (mg/m3): 492

Maximum Hourly Emission Rate (lbs/hr): 194.48*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 11,628

MAGLC (ug/m3): 11,714

Pollutant: n-propyl acetate

TLV (mg/m3): 835

Maximum Hourly Emission Rate (lbs/hr): 74.26*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 4,505

MAGLC (ug/m3): 19,881

Pollutant: isopropyl alcohol

TLV (mg/m3): 983

Maximum Hourly Emission Rate (lbs/hr): 100.96*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 6,222

MAGLC (ug/m3): 23,405

Pollutant: ethyl alcohol

TLV (mg/m3): 1880

Maximum Hourly Emission Rate (lbs/hr): 194.48*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 12,419

MAGLC (ug/m3): 44,762

Pollutant: ethyl acetate

TLV (mg/m3): 1440

Maximum Hourly Emission Rate (lbs/hr): 276.98*

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 18,351

MAGLC (ug/m3): 34,286

*Combined increase in the allowable emission rate multiplied by the maximum air toxic pollutant weight ratio for emissions units K008, K010, K013, K015, K016, K017, K018, and K020.

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 1677000105 Emissions Unit ID: K018 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. 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>
9-color narrow flexographic printing press and laminator - Comco III.	OAC rule 3745-31-05(A)(3) (PTI 16-02184)	10.0 pounds of volatile organic compounds (VOC) per hour 10.0 tons of VOC per year The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(Y)(1)(a).
	OAC rule 3745-21-09(Y)(1)(a)	See A.I.2.a below.

2. Additional Terms and Conditions

- a. The volatile organic compound content of the coatings and inks shall not exceed the following limitations:
 - (a)
 - a. forty percent VOC by volume of the coating or ink, excluding water and exempt solvents; or
 - b. twenty-five percent VOC by volume of the volatile matter in the coating or ink.

[Authority for term: OAC rule 3745-21-09(Y)(1)(a) and OAC rule 3745-31-05(A)(3)]
 - b. The hourly VOC emission limitation is based on the emissions unit's potential to emit. Therefore, no record keeping or reporting is required to demonstrate compliance with this limit.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for the line:
 - a. the name and identification number of each coating and ink, as applied; and
 - b. the VOC content in percentage VOC by volume of each coating and ink (excluding water and exempt solvents); or
 - c. the VOC content in percentage VOC by volume of the volatile matter in each coating and ink.

(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.)

[Authority for term: OAC rule 3745-21-09(B)(3)(f), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(C)(1)]
2. The permittee shall maintain monthly records of the following information:
 - a. the linear feet of material produced by this emissions unit;
 - b. the total linear feet of material produced by all of the emissions units that do not employ control equipment;

- c. the average, uncontrolled VOC emission rate for this emissions unit, in tons per month (A.III.2.a divided by A.III.2.b, and then multiplied by A.2.a.xi of Part II - Specific Facility Terms and Conditions).

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

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IV. **Reporting Requirements**

1. The permittee shall notify the Akron RAQMD in writing of any monthly record showing the use of noncomplying coatings (for VOC content). The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 30 days following the end of the calendar month.

[Authority for term: OAC rule 3745-21-09(B)(3)(g), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(C)(1)]

2. The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

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V. **Testing Requirements**

1. Compliance with the emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

forty percent VOC by volume of the coating and ink, excluding water and exempt solvents or twenty-five percent VOC by volume of the volatile matter in the coating and ink

Applicable Compliance Method:

OAC rule 3745-21-10(B). 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 11.4 of Method 24, 40 CFR Part 60, Appendix A, the permittee 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.

[Authority for term: OAC rule 3745-21-10(B), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

10.0 pounds of VOC per hour

Applicable Compliance Method:

Compliance with this emission limitation has been determined by multiplying the maximum line speed in feet per minute by 60 minutes per hour times the maximum print/coat width in feet times the maximum pounds of VOC per ream times one ream per 3000 square feet.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

c. Emission Limitation:

10.0 tons of VOC per year

Applicable Compliance Method:

Compliance with this emission limitation shall be determined based upon the records required pursuant to Part II - Specific Facility Terms and Conditions section A.2.a of this permit and section A.III.2 above.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 1677000105 Emissions Unit ID: K018 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. 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>
9-color narrow flexographic printing press and laminator - Comco III.	none	See B.III.1 below.

2. Additional Terms and Conditions

1. None

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permit to install for this emissions unit (K018) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the ISCST3 Version 00101 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the ISCST3 Version 00101 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: n-propyl alcohol
 TLV (mg/m3): 492
 Maximum Hourly Emission Rate (lbs/hr): 194.48*
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 11,628
 MAGLC (ug/m3): 11,714

Pollutant: n-propyl acetate
 TLV (mg/m3): 835
 Maximum Hourly Emission Rate (lbs/hr): 74.26*
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 4,505
 MAGLC (ug/m3): 19,881

Pollutant: isopropyl alcohol
 TLV (mg/m3): 983
 Maximum Hourly Emission Rate (lbs/hr): 100.96*
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 6,222

MAGLC (ug/m3): 23,405

Pollutant: ethyl alcohol

TLV (mg/m3): 1880

Maximum Hourly Emission Rate (lbs/hr): 194.48*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 12,419

MAGLC (ug/m3): 44,762

Pollutant: ethyl acetate

TLV (mg/m3): 1440

Maximum Hourly Emission Rate (lbs/hr): 276.98*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 18,351

MAGLC (ug/m3): 34,286

*Combined increase in the allowable emission rate multiplied by the maximum air toxic pollutant weight ratio for emissions units K008, K010, K013, K015, K016, K017, K018, and K020.

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 1677000105 Emissions Unit ID: K020 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. 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>
10 color flexographic printing press with turboclean inking/washup system, in-line adhesive station, and two color in-line backside flexo station - WH-5, controlled with a thermal incinerator (oxidizer)	OAC rule 3745-31-05(A)(3) (PTI 16-02184)	124.0 pounds of volatile organic compounds (VOC) per hour (See A.I.2.a below.) 109 tons of VOC per year
	OAC rule 3745-21-09(Y)(1)(a)	See A.I.2.b and A.I.2.c below. The emission limitation specified by this rule is equivalent to the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-09(Y)(1)(b)	The emission control requirements based on this applicable rule are less stringent than or equivalent to the emission control requirements established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- a. The hourly VOC emission limitation is based on the emissions unit's potential to emit. Therefore, no record keeping or reporting is required to demonstrate compliance with this limit.
- (a) [Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]
- b. The printing line shall be equipped with a capture system and associated control system which are designed and operated to achieve a control efficiency which is at least 90 percent, by weight, and a capture efficiency which is at least 90 percent, by weight, for VOC.
[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]
- c. When venting the VOC emissions from the laminator to the atmosphere, the volatile organic compound content of the coatings and inks shall not exceed the following:
 - i. forty percent VOC by volume of the coating or ink, excluding water and exempt solvents; or
 - ii. twenty-five percent VOC by volume of the volatile matter in the coating or ink.
 [Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]

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II. Operational Restrictions

1. The VOC emissions from the 10-color flexographic printing press and the backside printing stations shall be vented to the thermal incinerator (oxidizer) when the emissions unit is in operation.
[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]
2. When employing a coating on the laminator that meets the requirements of term and condition A.I.2.c above, the VOC emissions from the laminator may be vented to the atmosphere.
[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]
3. When employing a coating on the laminator that does not meet the requirements of term and condition A.I.2.c

above, the VOC emissions shall be vented the thermal incinerator (oxidizer).

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]

4. The average combustion temperature within the thermal incinerator (oxidizer), for any 3-hour block of time, shall not be less than 1550 degrees Fahrenheit or shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]

5. This emissions unit shall be operated with an interlock system that prevents the operation of this emissions unit when materials not meeting the VOC content limitations specified in OAC rule 3745-21-09(Y)(1)(a)(i) or (ii) are utilized and the thermal incinerator (oxidizer) is not in operation.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]

6. All ventilation fans associated with this emissions unit and the thermal incinerator (oxidizer) shall be in operation at all times when this emissions unit is in operation and utilizing materials that do not meet the VOC content limitations specified in OAC rule 3745-21-09(Y)(1)(a)(i) or (ii).

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]

7. All bypass dampers, actuator pins, and associated motors shall be in the correct position and in good operating condition at all times when this emissions unit is in operation and utilizing materials that do not meet the VOC content limitations specified in OAC rule 3745-21-09(Y)(1)(a)(i) or (ii), to ensure that all captured VOC emissions are vented to the thermal incinerator (oxidizer). Also, all the hooding and ductwork comprising the VOC emission capture system for this emissions unit shall be free of leaks and holes that would permit the escape of the captured VOC emissions.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]

8. The average, total exhaust flow rate from this emissions unit to the thermal incinerator (oxidizer) shall not be less than 3987 standard cubic feet per minute (scfm) or shall not be less than the exhaust flow rate documented during the last emission tests that demonstrated the emissions unit was in compliance with the applicable capture efficiency limitation.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain records documenting any time periods when the emissions unit was in operation and the emissions from the emissions unit were not vented to the thermal incinerator (oxidizer) except for time periods when the emissions from the laminator are vented to the atmosphere as allowed by term and condition A.I.2.c and the emissions from the 10-color flexographic printing press and the backside printing presses are vented to the thermal incinerator (oxidizer).

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

2. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator (oxidizer). Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

3. The permittee shall collect and record the following information for each day for the control equipment:

a. all 3-hour blocks of time (when the emissions unit was in operation) during which the average combustion temperature within the thermal incinerator (oxidizer) was less than 1550 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance; and

b. a log of operating time for the capture (collection) system, thermal incinerator (oxidizer), monitoring equipment, and the associated emissions unit. The permittee may use recorded temperature data as the log documenting that the monitoring equipment and control device are operating. Bypass of the collection system by the emissions unit shall be logged as to the date and time.

[Authority for term: OAC rule 3745-21-09(B)(3)(l), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(C)(1)]

4. On an annual basis, the permittee shall inspect the electronics of the interlock system used for this emissions unit to verify the signals between the thermal incinerator (oxidizer) and the emissions unit are functioning properly. The permittee shall document the results of all annual inspections. An excursion is defined as a finding that the interlock is inoperative. Any excursion shall require that the process line be immediately shut down and remain shut down until the problem has been corrected.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

5. Except as noted below, each calendar quarter, the permittee shall utilize an anemometer, or any other equivalent measurement method approved by the Ohio EPA, to measure the total exhaust flow rate from

this emissions unit to the thermal incinerator (oxidizer), in scfm. The anemometer, or other equivalent measurement method approved by the Ohio EPA, shall be capable of accurately measuring the desired parameter and shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee. The measurements shall be taken while this emissions unit and all other printing lines at the facility are in a normal mode of operation. The permittee shall maintain records of the results of all exhaust flow rate measurements.

If the total exhaust flow rate measurements for four consecutive quarters do not identify a deviation of the applicable operational restriction, the permittee may perform the total exhaust flow rate measurements on a semiannual basis. Should the total exhaust flow rate measurements taken on a semiannual basis identify a deviation of the applicable operational restriction, the permittee shall revert to quarterly measurements.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

6. Each calendar month, the permittee shall inspect the operational condition and integrity of each ventilation fan comprising the capture system. Ventilation fan observations shall include visual inspections of the fan wheel, belts, and bearings. Lubrication of bearings and replacement of parts shall occur as necessary. The permittee shall document the results of all monthly inspections, including any corrective actions taken.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

7. Each calendar month, the permittee shall inspect the operational condition and integrity of all hooding, ductwork, and bypass dampers comprising the capture system. Hooding and ductwork observations shall include visual inspections for leaks or holes. Bypass damper observations shall include visual inspections to verify that the damper setting is in the correct position (i.e., to the thermal incinerator (oxidizer) or to atmosphere) and visual inspections of the actuator and motor to verify that the actuator pin and the motor are operating properly. The permittee shall document the results of all monthly inspections, including any corrective actions taken.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

8. The permittee shall collect and record the following information each month for the coatings employed on the laminator that are vented to the atmosphere:

- a. the name and identification number of each coating and ink, as applied; and
- b. the VOC content in percentage VOC by volume of each coating and ink (excluding water and exempt solvents); or
- c. the VOC content in percentage VOC by volume of the volatile matter in each coating and ink.

(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.)

[Authority for term: OAC rule 3745-21-09(B)(3)(f), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(C)(1)]

9. If a job specification calls for a coating to be employed on the laminator that does not comply with the requirements of term and condition A.1.2.c, then the permittee shall maintain the following information in a log:

- a. the date;
- b. confirmation that the VOC emissions from the noncomplying coatings were diverted to the thermal incinerator (oxidizer); and
- c. the personnel initials.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

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IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify any time periods when the emissions unit was in operation and the emissions from the emissions unit were not vented to the thermal incinerator (oxidizer) except for time periods when the emissions from the laminator are vented to the atmosphere as allowed by term and condition A.1.2.c and the emissions from the 10-color flexographic printing press and the backside printing presses are vented to the thermal incinerator (oxidizer). Each report shall be submitted within 30 days after the deviation occurs.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

2. The permittee shall submit quarterly summaries of the following records:
- a. all 3-hour blocks of time (when the emissions unit was in operation) during which the average combustion temperature within the thermal incinerator (oxidizer) was less than 1550 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance; and
 - b. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the

associated emissions unit.

These quarterly summaries shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

[Authority for term: OAC rule 3745-21-09(B)(3)(m), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(C)(1)]

3. The permittee shall submit quarterly deviation (excursion) reports that identify the following events when this emissions unit is utilizing materials that do not meet the VOC content limitations specified in OAC rule 3745-21-09(Y)(1)(a)(i) or (ii):

a. each time the interlock system does not stop the operation of this emissions unit when the thermal incinerator (oxidizer) is not in operation;

b. each average, total exhaust flow rate measurement that does not comply with the operational restriction specified in section A.II.8, based on the records maintained pursuant to section A.III.5 of these terms and conditions, and the magnitude of each deviation; and

c. each time any bypass dampers, actuator pins, and/or associated motors are not in the correct position and in good operating condition and/or any of the hooding or ductwork comprising the VOC emission capture system contains leaks or holes that would permit the escape of the captured VOC emissions.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

4. The permittee shall submit annual reports that specify the results of each annual inspection of the electronics of the ventilation fan interlock systems and the thermal incinerator (oxidizer) interlock system, based on the records maintained pursuant to section A.III.4 of these terms and conditions.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

5. The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

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V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted by November 4, 2008 to determine the control efficiency of the thermal incinerator (oxidizer). (Control efficiency testing to demonstrate compliance with the applicable 90 percent control efficiency limitation was performed on November 4, 2003, pursuant to the installation of the thermal incinerator (oxidizer)).

b. The emission testing shall be conducted to demonstrate compliance with the 90 percent, by weight, control efficiency limitation for VOC. (Capture efficiency testing to demonstrate compliance with the applicable 90 percent efficiency limitation was performed on March 15, 2005.)

c. The test method(s) which must be employed to demonstrate compliance with the capture and control efficiency limitations for VOC are specified below. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Akron RAQMD.

e. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

f. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

g. During each capture efficiency test run, the permittee shall measure the total exhaust flow rate from this emissions unit to the thermal incinerator (oxidizer), in scfm.

[Authority for term: OAC rule 3745-21-10(C), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(C)(1)]

2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Akron RAQMD. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Akron RAQMD's refusal to accept the results of the emission test(s).

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

3. Personnel from the Akron RAQMD shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- [Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]
4. A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Akron RAQMD within 30 days following completion of the test (s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Akron RAQMD.
- [Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]
5. Compliance with the emission limitations and control efficiency requirements in sections A.1.1 and A.1.2 of these terms and conditions shall be determined in accordance with the following methods:
- a. Emission Limitation:
- 124.0 pounds of VOC per hour
- Applicable Compliance Method:
- Compliance with this emission limitation has been determined by multiplying the maximum line speed in feet per minute by 60 minutes per hour times the maximum print/coat width in feet times the maximum pounds of VOC per ream times one ream per 3000 square feet times (1 - 0.81*).
- *overall control efficiency based on the capture efficiency requirement of 90%, by weight and the control efficiency requirement of 90%, by weight.
- [Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]
- b. Emission Limitation:
- 109 tons of VOC per year
- Applicable Compliance Method:
- Compliance with this emission limitation shall be determined based upon the records required pursuant to Part II - Specific Facility Terms and Conditions section A.2.b of this permit.
- [Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]
- c. Emission Limitation:
- forty percent VOC by volume of the coating and ink, excluding water and exempt solvents or twenty-five percent VOC by volume of the volatile matter in the coating and ink
- Applicable Compliance Method:
- OAC rule 3745-21-10(B). 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 11.4 of Method 24, 40 CFR Part 60, Appendix A, the permittee 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.
- [Authority for term: OAC rule 3745-21-10(B), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(C)(1)]
- d. Emission Limitation:
- A control efficiency which is at least 90 percent, by weight, for VOC
- Applicable Compliance Method:
- Compliance shall be demonstrated based upon the emission testing requirements specified in section A.V.1.
- [Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]
- e. Emission Limitation:
- A capture efficiency which is at least 90 percent, by weight, for VOC
- Applicable Compliance Method:
- If required, compliance shall be demonstrated based upon the emission testing requirements specified in section A.V.1.
- [Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 1677000105 Emissions Unit ID: K020 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **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>
10 color flexographic printing press with turboclean inking/washup system, in-line adhesive station, and two color in-line backside flexo station - WH-5, controlled with a thermal incinerator (oxidizer)	none	See B.III.1 below.

2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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

1. The permit to install for this emissions unit (K020) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the ISCST3 Version 00101 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the ISCST3 Version 00101 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: n-propyl alcohol
 TLV (mg/m3): 492
 Maximum Hourly Emission Rate (lbs/hr): 194.48*
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 11,628
 MAGLC (ug/m3): 11,714
 Pollutant: n-propyl acetate
 TLV (mg/m3): 835

Maximum Hourly Emission Rate (lbs/hr): 74.26*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 4,505

MAGLC (ug/m3): 19,881

Pollutant: isopropyl alcohol

TLV (mg/m3): 983

Maximum Hourly Emission Rate (lbs/hr): 100.96*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 6,222

MAGLC (ug/m3): 23,405

Pollutant: methyl ethyl ketone

TLV (mg/m3): 590

Maximum Hourly Emission Rate (lbs/hr): 43.90**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3,081

MAGLC (ug/m3): 14,048

Pollutant: ethyl alcohol

TLV (mg/m3): 1880

Maximum Hourly Emission Rate (lbs/hr): 194.48*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 12,419

MAGLC (ug/m3): 44,762

Pollutant: ethyl acetate

TLV (mg/m3): 1440

Maximum Hourly Emission Rate (lbs/hr): 276.98*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 18,351

MAGLC (ug/m3): 34,286

*Combined increase in the allowable emission rate multiplied by the maximum air toxic pollutant weight ratio for emissions units K008, K010, K013, K015, K016, K017, K018, and K020.

**Combined increase in the allowable emission rate multiplied by the maximum air toxic pollutant weight ratio for emissions units K008, K010, K013, K015, K016, and K020.

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 1677000105 Emissions Unit ID: P008 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. 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>
Flexographic Plate Making Process - DUPONT 2, controlled with a thermal incinerator (oxidizer)	OAC rule 3745-31-05(A)(3) (PTI 16-02304)	0.51 pound of organic compounds (OC) per hour
		2.44 tons of OC per year including cleanup material emissions
		0.023 ton of combined hazardous air pollutants (HAPs) per year
		See A.I.2.a below.
	OAC rule 3745-21-07(G)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2) and OAC rule 3745-21-07(G)(6). Emissions of organic compounds shall be reduced by at least eighty-five percent (85%), by weight, as an overall control efficiency.
	OAC rule 3745-21-07(G)(6)	Ninety percent or more of the carbon in the organic material being incinerated shall be oxidized to carbon dioxide, in accordance with test methods and procedures identified in section A.V.1.e.

- 2. **Additional Terms and Conditions**

- a. The hourly OC emission limitation is based on the emissions unit's potential to emit. Therefore, no record keeping or reporting is required to demonstrate compliance with this limit.
- (a) [Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]

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II. Operational Restrictions

1. The VOC emissions from the plate wash/dryer/anti-tack unit shall be vented to the thermal incinerator (oxidizer) when the emissions unit is in operation.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]
2. The average combustion temperature within the thermal incinerator (oxidizer), for any 3-hour block of time, shall not be less than 1550 degrees Fahrenheit or shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]
3. The permittee shall not employ any cleanup material that meets the definition of photochemically reactive material as defined by OAC rule 3745-21-01(C)(5) for this process (i.e., cleaning of the film negatives etc.).

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]
4. The permittee shall not employ any cleanup material which contains any of the hazardous air pollutants (HAPs) listed in section 112(b) of the Clean Air Act for this process (i.e., cleaning of the film negatives etc.).

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain records documenting any time periods when the emissions unit was in operation and the emissions from the plate wash/dryer/anti-tack unit were not vented to the thermal incinerator (oxidizer).

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]
2. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator (oxidizer). Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]
3. The permittee shall collect and record all 3-hour blocks of time (when the emissions unit was in operation) during which the average combustion temperature within the thermal incinerator (oxidizer) was less than 1550 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]
4. The permittee shall maintain the following information for this emissions unit:
 - a. the identification of each cleanup material employed for this process;
 - b. the MSDS sheets for each cleanup material employed for this process;
 - c. documentation as to whether or not each cleanup material is a photochemically reactive material as defined by OAC rule 3745-21-01(C)(5); and
 - d. documentation as to whether or not each cleanup material contains any HAPs listed in section 112(b) of the Clean Air Act.
[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]
5. The permittee shall collect and record the following information for each month for this emissions unit:
 - a. the amount of photopolymer plates produced, in square feet per month;
 - b. the uncontrolled OC emission rate from the plate production, in pounds per month (i.e., (a) times 0.09 pound of OC per square foot of material processed*);
 - c. the controlled OC emission rate from the plate production, in tons per month (i.e., (b) times (1-0.85**), and then divided by 2000);
 - d. the combined HAPs content of the plate wash material, in weight percent;

- e. the controlled combined HAPs emission rate from the plate production, in tons per month (i.e., (c) times ((d) divided by 100));
- f. the company identification for each cleanup material employed;
- g. the number of pounds of each cleanup material employed;
- h. the OC content of each cleanup material, in weight percent;
- i. the OC emission rate for all cleanup materials, in tons per month (i.e., (g) times ((h) divided by 100), and then divided by 2000); and
- j. the total OC emission rate, in tons per month (i.e., (c) plus (i)).

*Emission factor developed by the permittee in the document titled "Plate Wash Emission Calculation Spreadsheet" dated 2/18/02.

**Eighty-five percent overall control efficiency shall be used in the calculation unless stack testing is performed for the capture efficiency and the control efficiency. If stack testing is performed for the capture efficiency and the control efficiency, then the overall control efficiency from the most recent emission test that demonstrated that the emissions unit was in compliance shall be used in the calculation.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

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IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify any time periods when the emissions unit was in operation and the emissions from the plate wash/dryer/anti-tack unit were not vented the thermal incinerator (oxidizer). Each report shall be submitted within 30 days after the deviation occurs.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

2. The permittee shall notify the Akron RAQMD in writing if a photochemically reactive cleanup material (as defined in OAC rule 3745-21-01(C)(5)) is employed for this process. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 45 days after such an occurrence.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

3. The permittee shall notify the Akron RAQMD in writing if a cleanup material which contains any HAPs listed in section 112(b) of the Clean Air Act is employed for this process. The notification shall include a copy of such record and shall be sent to the Akron RAQMD within 45 days after such an occurrence.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

4. The permittee shall submit deviation (excursion) reports that identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator (oxidizer) does not comply with the temperature limitation specified above. These reports are due in accordance with the requirements specified in Part 1 - General Term and Condition A.1.c.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

5. The permittee shall submit annual reports that specify the total OC and total combined HAPs emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

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V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted by November 4, 2008 to determine the control efficiency of the thermal incinerator (oxidizer). (Control efficiency testing to demonstrate compliance with the applicable 90 percent control efficiency limitation was performed on November 4, 2003, pursuant to the installation of the thermal incinerator (oxidizer)).

b. The emission testing shall be conducted to demonstrate compliance the 90 percent, by weight, control efficiency limitation for OC.

c. The test method(s) which must be employed to demonstrate compliance with the control efficiency limitations for OC are specified below. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Akron RAQMD.

e. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the

control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Akron RAQMD. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Akron RAQMD's refusal to accept the results of the emission test(s).

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

3. Personnel from the Akron RAQMD shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

4. A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Akron RAQMD within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Akron RAQMD.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

5. Compliance with the emission limitations requirements in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

0.51 pound of OC per hour

Applicable Compliance Method:

Compliance with this emission limitation shall be demonstrated by multiplying the OC emission factor of 0.09 pound of OC per square feet of material* by the maximum hourly production rate (in square feet).

*The emission factor was derived by the facility in the document entitled "Plate Wash Emission Calculation Spreadsheet" dated 2/18/02.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

- b. Emission Limitation:

2.44 tons of OC per year including cleanup material emissions

Applicable Compliance Method:

Compliance with this emission limitation shall be demonstrated through record keeping as required in section A.III.5 of these terms and conditions.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

- c. Emission Limitation:

0.023 ton of combined HAPs per year

Applicable Compliance Method:

Compliance with this emission limitation shall be demonstrated through record keeping as required in section A.III.5 of these terms and conditions.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

- d. Emission Limitation:

Ninety percent or more of the carbon in the organic material being incinerated shall be oxidized to carbon dioxide.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing requirements specified in section A.V.1.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

- e. Emission Limitation:

Emissions of organic compounds shall be reduced by at least eighty-five percent (85%), by weight, as an overall control efficiency.

Applicable Compliance Method:

If required, compliance with this emission limitation shall be demonstrated based upon the emission testing requirement specified in section A.V.1 and capture testing using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.).

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 1677000105 Emissions Unit ID: P008 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. 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>
Flexographic Plate Making Process - DUPONT 2, controlled with a thermal incinerator (oxidizer)	none	See B.VI.1 below.

2. Additional Terms and Conditions

- 1. None

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. None

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IV. Reporting Requirements

- 1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because 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 cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.