Facility ID: 1677010525 Issuance type: Final State Permit To Operate

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

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

Go to Part II for Emissions Unit K007
Go to Part II for Emissions Unit K008
Go to Part II for Emissions Unit K009

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Facility ID: 1677010525 Emissions Unit ID: K007 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

   (a) None.

2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

   (a) None.

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

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Flexographic printing press	OAC rule 3745-31-05 (PTI 16-1707)	2.69 lbs/hr of volatile organic compounds (VOC) See A.2.a - A.2.c below. See B.1 below.
	OAC rule 3745-21-09(Y)	See B.2 below.
	40 CFR 63, Subpart KK	See D.3 below.

2. **Additional Terms and Conditions**

   (a) The emissions of VOC from this facility shall not exceed 95 tons per year (tpy), based upon a rolling, 12-month summation of the monthly emissions.

   To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

   Month(s) Maximum Allowable Cumulative Emissions of VOC (tons)

   1 7.92
   1-2 15.83
   1-3 23.75
   1-4 31.67
   1-5 39.58
   1-6 47.50
   1-7 55.42
   1-8 63.33
   1-9 71.25
   1-10 79.17
   1-11 87.08
   1-12 95.00

   After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitation for VOC shall be based upon a rolling, 12-month summation of the monthly facility emissions.
   The emissions of individual hazardous air pollutants (HAP) shall not exceed 9.0 tpy, based upon a rolling, 12-month summation of the monthly emissions.

   To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

   Month(s) Maximum Allowable Cumulative Emissions of Individual HAP (tons)

   1 0.75
   1-2 1.50

1-3 2.25
1-4 3.00
1-5 3.75
1-6 4.50
1-7 5.25
1-8 6.00
1-9 6.75
1-10 7.50
1-11 8.25
1-12 9.00

After the first 12 calendar months of operation following the issuance of this permit, compliance with the emission limitation for individual HAP shall be based upon a rolling, 12-month summation of the monthly facility emissions.
The emissions of total combined HAP shall not exceed 24.0 tpy, based upon a rolling, 12-month summation of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month(s) Maximum Allowable Cumulative Emissions of Total Combined HAP (tons)

1 2.0
1-2 4.0
1-3 6.0
1-4 8.0
1-5 10.0
1-6 12.0
1-7 14.0
1-8 16.0
1-9 18.0
1-10 20.0
1-11 22.0
1-12 24.0

After the first 12 calendar months of operation following the issuance of this permit, compliance with the emission limitation for total combined HAP shall be based upon a rolling, 12-month summation of the monthly facility emissions.

B. **Operational Restrictions**

1. The permittee shall only employ water-based, low VOC inks in this emissions unit.

2. The VOC content of the coatings and inks employed in each printing line shall not exceed the following limitations:

   a. forty per cent VOC by volume of coating and ink, excluding water and exempt solvents; or

   b. twenty-five per cent VOC by volume of the volatile matter in the coating and ink.

3. The permittee shall only employ coatings and inks that are complying coatings.

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

1. In order to demonstrate compliance with the facility-wide emission limitations, the permittee shall maintain monthly records which contain the following information:

   a. the name and company identification of each ink, coating, and cleanup material, as applied;

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

   c. the individual HAP content for each HAP of each ink, coating, and cleanup material in pounds of individual HAP per gallon of ink, coating, or cleanup material;

   d. the total combined HAP content of each ink, coating, and cleanup material, in pounds of combined HAP per gallon of ink, coating, or cleanup material (sum of all individual HAP contents from Section C.1.c); and

   e. the number of gallons of each ink, coating, and cleanup material applied.

2. The permittee shall on a monthly basis, calculate and record for the entire facility the individual HAP, total combined HAP, and VOC emission rates, in tons per month.

3. The permittee shall collect and record the following information each month for each emissions unit (K007, K008, K009):

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

   b. the VOC content in percentage VOC by volume of the coating, ink, and cleanup material, excluding water and exempt solvents; or

   c. the VOC content in percentage VOC by volume of the volatile matter in the coating, ink, and cleanup material.

   (This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to specific "gallons/year" and "tons/year" limitations, or just a "tons/year" limitation in a Permit to Install. In such cases, for each such new emissions unit only, the above-mentioned information must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

D. **Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility emission limitations for VOC, individual HAP, and total combined HAP, and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels for VOC, individual HAP, and total combined HAP.

2. The permittee shall submit deviation (excursion) reports which include any monthly record showing the use of noncomplying coatings or inks. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

3. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition 3.

4. The permittee shall submit an initial notification as required in 40 CFR 63 Subpart KK.

E. **Testing Requirements**

1. Compliance with the emission limitations in Sections A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:
USEPA Methods 24 and 24A shall be used to determine the VOC content for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to Section 4.3 of Method 24, 40 CFR Part 60, Appendix A, a 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.
Emission Limitation:

2.69 lbs/hr of VOC

Applicable Compliance Method:

Based on permit to install (PTI) 16-1707, the hourly potential emissions of VOC from this emissions unit are equal to the PTI limitation for VOC emissions.
Emission Limitation:

Maximum allowable cumulative of monthly facility-wide VOC emissions for the first 12 calendar months of operation following the issuance of this permit

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limitation based upon the recordkeeping requirements of Section C.2.
Emission Limitation:

Maximum allowable annual facility-wide VOC emissions after the first 12 calendar months of operation following the issuance of this permit, shall not exceed 95.0 tpy, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limitation based upon the recordkeeping requirements of Section C.1.
Emission Limitation:

Maximum allowable cumulative of monthly facility-wide individual HAP emissions for the first 12 calendar months of operation following the issuance of this permit

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limitation based upon the recordkeeping requirements of Section C.2.
Emission Limitation:

Maximum allowable annual facility-wide individual HAP emissions after the first 12 calendar months of operation following the issuance of this permit, shall not exceed 9.0 tpy, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limitation based upon the recordkeeping requirements of Section C.1.
Emission Limitation:

Maximum allowable cumulative of monthly facility-wide total combined HAP emissions for the first 12 calendar months of operation following the issuance of this permit

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limitation based upon the recordkeeping requirements of Section C.2.
Emission Limitation:

Maximum allowable annual facility-wide total combined HAP emissions after the first 12 calendar months of operation following the issuance of this permit, shall not exceed 24.0 tpy, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limitation based upon the recordkeeping requirements of Section C.1.
Emission Limitation:

forty per cent VOC by volume of coating and ink, excluding water and exempt solvents; or

twenty-five per cent VOC by volume of the volatile matter in the coating and ink

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limitation based upon the recordkeeping requirements of Section C.3.

F. **Miscellaneous Requirements**

1. The permittee is hereby notified that this permit and all agency records concerning this permitted emissions unit are subject to public disclosure in accordance with OAC rule 3745-49-03.

2. The permittee shall comply with any applicable State and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of this emissions unit.

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Facility ID: 1677010525 Emissions Unit ID: K008 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

(a) None.

2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

(a) None.

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

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Flexographic printing press	OAC rule 3745-31-05 (PTI 16-1707)	2.69 lbs/hr of volatile organic compounds (VOC) See A.2.a - A.2.c below. See B.1 below.
	OAC rule 3745-21-09(Y)	See B.2 below.
	40 CFR 63, Subpart KK	See D.3 below.

2. **Additional Terms and Conditions**

(a) The emissions of VOC from this facility shall not exceed 95 tons per year (tpy), based upon a rolling, 12-month summation of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month(s) Maximum Allowable Cumulative Emissions of VOC (tons)

1 7.92
1-2 15.83
1-3 23.75
1-4 31.67
1-5 39.58
1-6 47.50
1-7 55.42
1-8 63.33
1-9 71.25
1-10 79.17
1-11 87.08

1-12 95.00

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitation for VOC shall be based upon a rolling, 12-month summation of the monthly facility emissions.
The emissions of individual hazardous air pollutants (HAP) shall not exceed 9.0 tpy, based upon a rolling, 12-month summation of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month(s) Maximum Allowable Cumulative Emissions of Individual HAP (tons)

1 0.75
1-2 1.50
1-3 2.25
1-4 3.00
1-5 3.75
1-6 4.50
1-7 5.25
1-8 6.00
1-9 6.75
1-10 7.50
1-11 8.25
1-12 9.00

After the first 12 calendar months of operation following the issuance of this permit, compliance with the emission limitation for individual HAP shall be based upon a rolling, 12-month summation of the monthly facility emissions.
The emissions of total combined HAP shall not exceed 24.0 tpy, based upon a rolling, 12-month summation of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month(s) Maximum Allowable Cumulative Emissions of Total Combined HAP (tons)

1 2.0
1-2 4.0
1-3 6.0
1-4 8.0
1-5 10.0
1-6 12.0
1-7 14.0
1-8 16.0
1-9 18.0
1-10 20.0
1-11 22.0
1-12 24.0

After the first 12 calendar months of operation following the issuance of this permit, compliance with the emission limitation for total combined HAP shall be based upon a rolling, 12-month summation of the monthly facility emissions.

B. **Operational Restrictions**

1. The permittee shall only employ water-based, low VOC inks in this emissions unit.

2. The VOC content of the coatings and inks employed in each printing line shall not exceed the following limitations:

   a. forty per cent VOC by volume of coating and ink, excluding water and exempt solvents; or

   b. twenty-five per cent VOC by volume of the volatile matter in the coating and ink.

3. The permittee shall only employ coatings and inks that are complying coatings.

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

1. In order to demonstrate compliance with the facility-wide emission limitations, the permittee shall maintain monthly records which contain the following information:

   a. the name and company identification of each ink, coating, and cleanup material, as applied;

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

   c. the individual HAP content for each HAP of each ink, coating, and cleanup material in pounds of individual HAP per gallon of ink, coating, or cleanup material;

   d. the total combined HAP content of each ink, coating, and cleanup material, in pounds of combined HAP per gallon of ink, coating, or cleanup material (sum of all individual HAP contents from Section C.1.c); and

   e. the number of gallons of each ink, coating, and cleanup material applied.

2. The permittee shall on a monthly basis, calculate and record for the entire facility the individual HAP, total combined HAP, and VOC emission rates, in tons per month.

3. The permittee shall collect and record the following information each month for each emissions unit (K007, K008, K009):

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

b. the VOC content in percentage VOC by volume of the coating, ink, and cleanup material, excluding water and exempt solvents; or

c. the VOC content in percentage VOC by volume of the volatile matter in the coating, ink, and cleanup material.

(This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to specific "gallons/year" and "tons/year" limitations, or just a "tons/year" limitation in a Permit to Install. In such cases, for each such new emissions unit only, the above-mentioned information must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

D. **Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility emission limitations for VOC, individual HAP, and total combined HAP, and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels for VOC, individual HAP, and total combined HAP.

2. The permittee shall submit deviation (excursion) reports which include any monthly record showing the use of noncomplying coatings or inks. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

3. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition 3.

4. The permittee shall submit an initial notification as required in 40 CFR 63 Subpart KK.

E. **Testing Requirements**

1. Compliance with the emission limitations in Sections A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:
USEPA Methods 24 and 24A shall be used to determine the VOC content for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to Section 4.3 of Method 24, 40 CFR Part 60, Appendix A, a 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.
Emission Limitation:

2.69 lbs/hr of VOC

Applicable Compliance Method:

Based on permit to install (PTI) 16-1707, the hourly potential emissions of VOC from this emissions unit are equal to the PTI limitation for VOC emissions.
Emission Limitation:

Maximum allowable cumulative of monthly facility-wide VOC emissions for the first 12 calendar months of operation following the issuance of this permit

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limitation based upon the recordkeeping requirements of Section C.2.
Emission Limitation:

Maximum allowable annual facility-wide VOC emissions after the first 12 calendar months of operation following the issuance of this permit, shall not exceed 95.0 tpy, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limitation based upon the recordkeeping requirements of Section C.1.
Emission Limitation:

Maximum allowable cumulative of monthly facility-wide individual HAP emissions for the first 12 calendar months of operation following the issuance of this permit

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limitation based upon the recordkeeping requirements of Section C.2.
Emission Limitation:

Maximum allowable annual facility-wide individual HAP emissions after the first 12 calendar months of operation following the issuance of this permit, shall not exceed 9.0 tpy, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limitation based upon the recordkeeping requirements of Section C.1.

Emission Limitation:

Maximum allowable cumulative of monthly facility-wide total combined HAP emissions for the first 12 calendar months of operation following the issuance of this permit

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limitation based upon the recordkeeping requirements of Section C.2.
Emission Limitation:

Maximum allowable annual facility-wide total combined HAP emissions after the first 12 calendar months of operation following the issuance of this permit, shall not exceed 24.0 tpy, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limitation based upon the recordkeeping requirements of Section C.1.
Emission Limitation:

forty per cent VOC by volume of coating and ink, excluding water and exempt solvents; or

twenty-five per cent VOC by volume of the volatile matter in the coating and ink

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limitation based upon the recordkeeping requirements of Section C.3.

F. **Miscellaneous Requirements**

1. The permittee is hereby notified that this permit and all agency records concerning this permitted emissions unit are subject to public disclosure in accordance with OAC rule 3745-49-03.

2. The permittee shall comply with any applicable State and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of this emissions unit.

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

Facility ID: 1677010525 Emissions Unit ID: K009 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

   (a) None.

2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

   (a) None.

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

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Flexographic printing press	OAC rule 3745-31-05 (PTI 16-1707)	2.69 lbs/hr of volatile organic compounds (VOC) See A.2.a - A.2.c below. See B.1 below.
	OAC rule 3745-21-09(Y)	See B.2 below.
	40 CFR 63, Subpart KK	See D.3 below.

2. **Additional Terms and Conditions**

   (a) The emissions of VOC from this facility shall not exceed 95 tons per year (tpy), based upon a rolling, 12-month summation of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month(s) Maximum Allowable Cumulative Emissions of VOC (tons)

1 7.92
1-2 15.83
1-3 23.75
1-4 31.67
1-5 39.58
1-6 47.50
1-7 55.42
1-8 63.33
1-9 71.25
1-10 79.17
1-11 87.08
1-12 95.00

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitation for VOC shall be based upon a rolling, 12-month summation of the monthly facility emissions.
The emissions of individual hazardous air pollutants (HAP) shall not exceed 9.0 tpy, based upon a rolling, 12-month summation of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month(s) Maximum Allowable Cumulative Emissions of Individual HAP (tons)

1 0.75
1-2 1.50
1-3 2.25
1-4 3.00
1-5 3.75
1-6 4.50
1-7 5.25
1-8 6.00
1-9 6.75
1-10 7.50
1-11 8.25
1-12 9.00

After the first 12 calendar months of operation following the issuance of this permit, compliance with the emission limitation for individual HAP shall be based upon a rolling, 12-month summation of the monthly facility emissions.
The emissions of total combined HAP shall not exceed 24.0 tpy, based upon a rolling, 12-month summation of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month(s) Maximum Allowable Cumulative Emissions of Total Combined HAP (tons)

1 2.0
1-2 4.0
1-3 6.0
1-4 8.0
1-5 10.0
1-6 12.0
1-7 14.0
1-8 16.0
1-9 18.0
1-10 20.0
1-11 22.0
1-12 24.0

After the first 12 calendar months of operation following the issuance of this permit, compliance with the emission limitation for total combined HAP shall be based upon a rolling, 12-month summation of the monthly facility emissions.

B. **Operational Restrictions**

1. The permittee shall only employ water-based, low VOC inks in this emissions unit.

2. The VOC content of the coatings and inks employed in each printing line shall not exceed the following limitations:

   a. forty per cent VOC by volume of coating and ink, excluding water and exempt solvents; or

   b. twenty-five per cent VOC by volume of the volatile matter in the coating and ink.

3. The permittee shall only employ coatings and inks that are complying coatings.

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

1. In order to demonstrate compliance with the facility-wide emission limitations, the permittee shall maintain monthly records which contain the following information:

a. the name and company identification of each ink, coating, and cleanup material, as applied;

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

c. the individual HAP content for each HAP of each ink, coating, and cleanup material in pounds of individual HAP per gallon of ink, coating, or cleanup material;

d. the total combined HAP content of each ink, coating, and cleanup material, in pounds of combined HAP per gallon of ink, coating, or cleanup material (sum of all individual HAP contents from Section C.1.c); and

e. the number of gallons of each ink, coating, and cleanup material applied.

2. The permittee shall on a monthly basis, calculate and record for the entire facility the individual HAP, total combined HAP, and VOC emission rates, in tons per month.

3. The permittee shall collect and record the following information each month for each emissions unit (K007, K008, K009):

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

b. the VOC content in percentage VOC by volume of the coating, ink, and cleanup material, excluding water and exempt solvents; or

c. the VOC content in percentage VOC by volume of the volatile matter in the coating, ink, and cleanup material.

(This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to specific "gallons/year" and "tons/year" limitations, or just a "tons/year" limitation in a Permit to Install. In such cases, for each such new emissions unit only, the above-mentioned information must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

D. **Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility emission limitations for VOC, individual HAP, and total combined HAP, and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels for VOC, individual HAP, and total combined HAP.

2. The permittee shall submit deviation (excursion) reports which include any monthly record showing the use of noncomplying coatings or inks. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

3. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition 3.

4. The permittee shall submit an initial notification as required in 40 CFR 63 Subpart KK.

E. **Testing Requirements**

1. Compliance with the emission limitations in Sections A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:
USEPA Methods 24 and 24A shall be used to determine the VOC content for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to Section 4.3 of Method 24, 40 CFR Part 60, Appendix A, a 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.
Emission Limitation:

2.69 lbs/hr of VOC

Applicable Compliance Method:

Based on permit to install (PTI) 16-1707, the hourly potential emissions of VOC from this emissions unit are equal to the PTI limitation for VOC emissions.
Emission Limitation:

Maximum allowable cumulative of monthly facility-wide VOC emissions for the first 12 calendar months of operation following the issuance of this permit

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limitation based upon the recordkeeping requirements of Section C.2.
Emission Limitation:

Maximum allowable annual facility-wide VOC emissions after the first 12 calendar months of operation following the issuance of this permit, shall not exceed 95.0 tpy, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limitation based upon the recordkeeping requirements of Section C.1.
Emission Limitation:

Maximum allowable cumulative of monthly facility-wide individual HAP emissions for the first 12 calendar months of operation following the issuance of this permit

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limitation based upon the recordkeeping requirements of Section C.2.
Emission Limitation:

Maximum allowable annual facility-wide individual HAP emissions after the first 12 calendar months of operation following the issuance of this permit, shall not exceed 9.0 tpy, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limitation based upon the recordkeeping requirements of Section C.1.
Emission Limitation:

Maximum allowable cumulative of monthly facility-wide total combined HAP emissions for the first 12 calendar months of operation following the issuance of this permit

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limitation based upon the recordkeeping requirements of Section C.2.
Emission Limitation:

Maximum allowable annual facility-wide total combined HAP emissions after the first 12 calendar months of operation following the issuance of this permit, shall not exceed 24.0 tpy, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limitation based upon the recordkeeping requirements of Section C.1.
Emission Limitation:

forty per cent VOC by volume of coating and ink, excluding water and exempt solvents; or

twenty-five per cent VOC by volume of the volatile matter in the coating and ink

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limitation based upon the recordkeeping requirements of Section C.3.

F. **Miscellaneous Requirements**

1. The permittee is hereby notified that this permit and all agency records concerning this permitted emissions unit are subject to public disclosure in accordance with OAC rule 3745-49-03.

2. The permittee shall comply with any applicable State and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of this emissions unit.