

Facility ID: 1677110082 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 K001](#)
- [Go to Part II for Emissions Unit K002](#)
- [Go to Part II for Emissions Unit K003](#)
- [Go to Part II for Emissions Unit K004](#)
- [Go to Part II for Emissions Unit K005](#)
- [Go to Part II for Emissions Unit K006](#)
- [Go to Part II for Emissions Unit K007](#)
- [Go to Part II for Emissions Unit P001](#)

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Facility ID: 1677110082 Emissions Unit ID: K001 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

Part II - Special Terms and Conditions

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
6-color flexographic printing press - 6 color Webtron	OAC rule 3745-21-09(Y)(2)(b)	The facility is exempt from OAC rule 3745-21-09(Y)(1) because the total maximum usage of coatings for all flexographic printing lines located at the facility is less than or equal to one hundred forty-eight tons per year.

2. **Additional Terms and Conditions**
 - (a) None

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. None

D. Reporting Requirements

1. None

E. Testing Requirements

1. None

F. Miscellaneous Requirements

1. None

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Facility ID: 1677110082 Emissions Unit ID: K002 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

Part II - Special Terms and Conditions

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
4-color flexographic printing press - 4 color Webtron	OAC rule 3745-21-09(Y)(2)(b)	The facility is exempt from OAC rule 3745-21-09(Y) (1) because the total maximum usage of coatings for all flexographic printing lines located at the facility is less than or equal to one hundred forty-eight tons per year.

2. **Additional Terms and Conditions**
 - (a) None

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. None

D. Reporting Requirements

1. None

E. Testing Requirements

1. None

F. Miscellaneous Requirements

1. None

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

Facility ID: 1677110082 Emissions Unit ID: K003 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

Part II - Special Terms and Conditions

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
3-color flexographic printing press - 4120 Mark Andy	OAC rule 3745-31-05 (PTI 16-1868)	0.4 pound of organic compound (OC) per hour for coatings 2.1 tons of OC per year for coatings and cleanup

OAC rule 3745-21-09(Y)(2)(b)

The facility is exempt from OAC rule 3745-21-09(Y)(1) because the total maximum usage of coatings in all flexographic printing lines located at the facility is less than or equal to one hundred forty-eight tons per year.

2. **Additional Terms and Conditions**

(a) None

B. **Operational Restrictions**

1. None

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

1. The permittee shall collect and record the following information each month for this emissions unit:
 - a. the name and identification number of each coating;
 - b. the OC content of each coating, in pounds per gallon;
 - c. the amount of each coating employed, in gallons;
 - d. the name and identification number of each thinning solvent;
 - e. the OC content of each thinning solvent, in pounds per gallon;
 - f. the amount of each thinning solvent employed, in gallons;
 - g. the name and identification of each cleanup material employed;
 - h. the OC content of each cleanup material, in pounds per gallon;
 - i. the amount of each cleanup material employed, in gallons; and
 - j. the total OC emissions from all coatings, thinning solvents and cleanup materials employed, in tons per month (i.e., the sum of (b) times (c) for each coating plus (e) times (f) for each thinning solvent plus (h) times (i) for each cleanup material, and then divided by 2000 lbs/ton).
2. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
 - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
 - b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

D. **Reporting Requirements**

1. The permittee shall submit annual reports that specify the annual OC emission rate, in tons per year, for this emissions unit. 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).

E. **Testing Requirements**

1. Compliance with the emission limitation(s) in section A.1 of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitation:

0.4 lb/hr of OC

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the worst-case pounds of OC per gallon of coating, as applied, by the maximum gallons of coating per hour.

Emission Limitation:

2.1 tpy of OC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monthly record keeping of the coating, thinning solvent, and cleanup material usage and the OC content of each coating, thinning solvent, and cleanup material along with the total OC emissions from all coatings, thinning solvents and cleanup materials employed, in tons per month.

F. **Miscellaneous Requirements**

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: Isopropyl alcohol

TLV (mg/m3): 983

Maximum Hourly Emission Rate (lbs/hr): 4.2

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 9441

MAGLC (ug/m3): 23,404.76

Pollutant: 1-methoxy-2-propanol

TLV (mg/m3): 369

Maximum Hourly Emission Rate (lbs/hr): 0.9

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 2023

MAGLC (ug/m3): 8785.7

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 the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

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.

b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);

c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and

d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;

b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and

c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

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

Facility ID: 1677110082 Emissions Unit ID: K004 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

Part II - Special Terms and Conditions

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
8-color flexographic printing press - 4150 Mark Andy	OAC rule 3745-31-05 (PTI 16-1868)	1.0 pound of organic compound (OC) per hour for coatings 5.3 tons of OC per year for coatings and cleanup
	OAC rule 3745-21-09(Y)(2)(b)	The facility is exempt from OAC rule 3745-21-09(Y) (1) because the total maximum usage of coatings in all flexographic printing lines located at the facility is less than or equal to one hundred forty-eight tons per year.

2. **Additional Terms and Conditions**

(a) None

B. **Operational Restrictions**

1. None

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

1. The permittee shall collect and record the following information each month for this emissions unit:
 - a. the name and identification number of each coating;
 - b. the OC content of each coating, in pounds per gallon;
 - c. the amount of each coating employed, in gallons;
 - d. the name and identification number of each thinning solvent;
 - e. the OC content of each thinning solvent, in pounds per gallon;
 - f. the amount of each thinning solvent employed, in gallons;
 - g. the name and identification of each cleanup material employed;
 - h. the OC content of each cleanup material, in pounds per gallon;
 - i. the amount of each cleanup material employed, in gallons; and
 - j. the total OC emissions from all coatings, thinning solvents and cleanup materials employed, in tons per month (i.e., the sum of (b) times (c) for each coating plus (e) times (f) for each thinning solvent plus (h) times (i) for each cleanup material, and then divided by 2000 lbs/ton).
2. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
 - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
 - b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

D. **Reporting Requirements**

1. The permittee shall submit annual reports that specify the annual OC emission rate, in tons per year, for this emissions unit. 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).

E. **Testing Requirements**

1. Compliance with the emission limitation(s) in section A.1 of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitation:

1.0 lb/hr of OC

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the worst-case pounds of OC per gallon of coating, as applied, by the maximum gallons of coating per hour.

Emission Limitation:

5.3 tpy of OC

Applicable Compliance Method:

Compliance shall be demonstrated upon the monthly record keeping of the coating, thinning solvent, and cleanup material usage and the OC content of each coating, thinning solvent, and cleanup material, along with the total OC emissions from all coatings, thinning solvents and cleanup materials employed, in tons per month.

F. **Miscellaneous Requirements**

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and

is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: Isopropyl alcohol

TLV (mg/m3): 983

Maximum Hourly Emission Rate (lbs/hr): 4.2

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 9441

MAGLC (ug/m3): 23,404.76

Pollutant: 1-methoxy-2-propanol

TLV (mg/m3): 369

Maximum Hourly Emission Rate (lbs/hr): 0.9

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2023

MAGLC (ug/m3): 8785.7

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 the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

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

b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);

c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and

d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;

b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and

c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

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

Facility ID: 1677110082 Emissions Unit ID: K005 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

Part II - Special Terms and Conditions

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
8-color flexographic printing press- Comco Commander	OAC rule 3745-31-05 (PTI 16-1868)	1.0 pound of organic compound (OC) per hour for coatings 5.3 tons of OC per year for coatings and cleanup
	OAC rule 3745-21-09(Y)(2)(b)	The facility is exempt from OAC rule 3745-21-09(Y)(1) because the total maximum usage of coatings in all flexographic printing lines located at the facility is less than or equal to one hundred forty-eight tons per year.

2. **Additional Terms and Conditions**

- (a) None

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for this emissions unit:
 - a. the name and identification number of each coating;
 - b. the OC content of each coating, in pounds per gallon;
 - c. the amount of each coating employed, in gallons;
 - d. the name and identification number of each thinning solvent;
 - e. the OC content of each thinning solvent, in pounds per gallon;
 - f. the amount of each thinning solvent employed, in gallons;
 - g. the name and identification of each cleanup material employed;
 - h. the OC content of each cleanup material, in pounds per gallon;
 - i. the amount of each cleanup material employed, in gallons; and
 - j. the total OC emissions from all coatings, thinning solvents and cleanup materials employed, in tons per month (i.e., the sum of (b) times (c) for each coating plus (e) times (f) for each thinning solvent plus (h) times (i) for each cleanup material, and then divided by 2000 lbs/ton).
2. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
 - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
 - b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

D. Reporting Requirements

1. The permittee shall submit annual reports that specify the annual OC emission rate, in tons per year, for this emissions unit. 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).

E. Testing Requirements

1. Compliance with the emission limitation(s) in section A.1 of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitation:

1.0 lb/hr of OC

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the worst-case pounds of OC per gallon of coating, as applied, by the maximum gallons of coating per hour.

Emission Limitation:

5.3 tpy of OC

Applicable Compliance Method:

Compliance shall be demonstrated upon the monthly record keeping of the coating, thinning solvent, and cleanup material usage and the OC content of each coating, thinning solvent, and cleanup material, along with the total OC emissions from all coatings, thinning solvents and cleanup materials employed, in tons per month.

F. Miscellaneous Requirements

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: Isopropyl alcohol

TLV (mg/m3): 983

Maximum Hourly Emission Rate (lbs/hr): 4.2

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 9441

MAGLC (ug/m3): 23,404.76

Pollutant: 1-methoxy-2-propanol

TLV (mg/m3): 369

Maximum Hourly Emission Rate (lbs/hr): 0.9

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2023

MAGLC (ug/m3): 8785.7

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 the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- 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
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and
- d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

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Facility ID: 1677110082 Emissions Unit ID: K006 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

Part II - Special Terms and Conditions

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.

2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
7-color flexographic printing press - Comco Cadet I	OAC rule 3745-31-05 (PTI 16-1868)	0.9 pound of organic compound (OC) per hour for coatings 4.7 tons of OC per year for coatings and cleanup
	OAC rule 3745-21-09(Y)(2)(b)	The facility is exempt from OAC rule 3745-21-09(Y) (1) because the total maximum usage of coatings in all flexographic printing lines located at the facility is less than or equal to one hundred forty-eight tons per year.

2. **Additional Terms and Conditions**

- (a) None

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for this emissions unit:
 - a. the name and identification number of each coating;
 - b. the OC content of each coating, in pounds per gallon;
 - c. the amount of each coating employed, in gallons;
 - d. the name and identification number of each thinning solvent;
 - e. the OC content of each thinning solvent, in pounds per gallon;
 - f. the amount of each thinning solvent employed, in gallons;
 - g. the name and identification of each cleanup material employed;
 - h. the OC content of each cleanup material, in pounds per gallon;
 - i. the amount of each cleanup material employed, in gallons; and
 - j. the total OC emissions from all coatings, thinning solvents and cleanup materials employed, in tons per month (i.e., the sum of (b) times (c) for each coating plus (e) times (f) for each thinning solvent plus (h) times (i) for each cleanup material, and then divided by 2000 lbs/ton).
2. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
 - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
 - b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

D. Reporting Requirements

1. The permittee shall submit annual reports that specify the annual OC emission rate, in tons per year, for this emissions unit. 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).

E. Testing Requirements

1. Compliance with the emission limitation(s) in section A.1 of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitation:

0.9 lb/hr of OC

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the worst-case pounds of OC per gallon of coating, as applied, by the maximum gallons of coating per hour.

Emission Limitation:

4.7 tpy of OC

Applicable Compliance Method:

Compliance shall be demonstrated upon the monthly record keeping of the coating, thinning solvent, and cleanup material usage and the OC content of each coating, thinning solvent, and cleanup material, along with the total OC emissions from all coatings, thinning solvents and cleanup materials employed, in tons per month.

F. Miscellaneous Requirements

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: Isopropyl alcohol

TLV (mg/m3): 983

Maximum Hourly Emission Rate (lbs/hr): 4.2

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 9441

MAGLC (ug/m3): 23,404.76

Pollutant: 1-methoxy-2-propanol

TLV (mg/m3): 369

Maximum Hourly Emission Rate (lbs/hr): 0.9

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2023

MAGLC (ug/m3): 8785.7

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 the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

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

b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);

c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and

d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;

b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and

c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

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

Facility ID: 1677110082 Emissions Unit ID: K007 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

Part II - Special Terms and Conditions

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

ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
7-color flexographic printing press - Comco Cadet II	OAC rule 3745-31-05 (PTI 16-1868)	0.9 pound of organic compound (OC) per hour for coatings 4.7 tons of OC per year for coatings and cleanup
	OAC rule 3745-21-09(Y)(2)(b)	The facility is exempt from OAC rule 3745-21-09(Y) (1) because the total maximum usage of coatings in all flexographic printing lines located at the facility is less than or equal to one hundred forty-eight tons per year.

2. Additional Terms and Conditions

- (a) None

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for this emissions unit:
 - a. the name and identification number of each coating;
 - b. the OC content of each coating, in pounds per gallon;
 - c. the amount of each coating employed, in gallons;
 - d. the name and identification number of each thinning solvent;
 - e. the OC content of each thinning solvent, in pounds per gallon;
 - f. the amount of each thinning solvent employed, in gallons;
 - g. the name and identification of each cleanup material employed;
 - h. the OC content of each cleanup material, in pounds per gallon;
 - i. the amount of each cleanup material employed, in gallons; and
 - j. the total OC emissions from all coatings, thinning solvents and cleanup materials employed, in tons per month (i.e., the sum of (b) times (c) for each coating plus (e) times (f) for each thinning solvent plus (h) times (i) for each cleanup material, and then divided by 2000 lbs/ton).
2. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
 - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
 - b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

D. Reporting Requirements

1. The permittee shall submit annual reports that specify the annual OC emission rate, in tons per year, for this emissions unit. 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).

E. Testing Requirements

1. Compliance with the emission limitation(s) in section A.1 of these terms and conditions shall be determined in accordance with the following method(s):
Emission Limitation:

0.9 lb/hr of OC

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the worst-case pounds of OC per gallon of coating, as applied, by the maximum gallons of coating per hour.
Emission Limitation:

4.7 tpy of OC

Applicable Compliance Method:

Compliance shall be demonstrated upon the monthly record keeping of the coating, thinning solvent, and cleanup material usage and the OC content of each coating, thinning solvent, and cleanup material, along with the total OC emissions from all coatings, thinning solvents and cleanup materials employed, in tons per month.

F. **Miscellaneous Requirements**

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: Isopropyl alcohol

TLV (mg/m3): 983

Maximum Hourly Emission Rate (lbs/hr): 4.2

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 9441

MAGLC (ug/m3): 23,404.76

Pollutant: 1-methoxy-2-propanol

TLV (mg/m3): 369

Maximum Hourly Emission Rate (lbs/hr): 0.9

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2023

MAGLC (ug/m3): 8785.7

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 the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

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

b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);

c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and

d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;

b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and

c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

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

Facility ID: 1677110082 Emissions Unit ID: P001 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

Part II - Special Terms and Conditions

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
plate making machine	OAC rule 3745-31-05 (PTI 16-1868)	1.35 pounds of organic compounds (OC) per hour 5.9 tons of OC per year See A.2.a below.
	OAC rule 3745-21-07(G)(2)	

2. Additional Terms and Conditions

- (a) The OC emissions limitation based on OAC rule 3745-21-07(G)(2) is less stringent than the OC emissions limitation established pursuant to the best available technology requirements specified in OAC rule 3745-31-05.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information:
 - a. the company identification for each solvent and cleanup material employed;
 - b. the starting inventory of solvent, in gallons;
 - c. the ending inventory of solvent, in gallons;
 - d. the OC content of the solvent, in pounds per gallon;
 - e. the amount of cleanup material employed, in gallons;
 - f. the OC content of the cleanup material, in pounds per gallon; and
 - g. the amount of OC emitted each month, in tons per month (i.e. , [(b-c) times d]) plus [(e) times (f)], and then divide by 2000 lbs/ton).

D. Reporting Requirements

1. The permittee shall submit annual reports that specify the annual OC emission rate, in tons per year, for this emissions unit. 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).

E. Testing Requirements

1. Compliance with the emission limitation(s) in section A.1 of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitation:

1.35 lbs/hr of OC

Applicable Compliance Method:

Stack testing may be required in the future in accordance with the procedures and test method(s) in OAC rule 3745-21-10(C).

Emission Limitation:

5.9 tpy of OC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monthly record keeping of the solvent and cleanup material usage and the OC content of the solvent and cleanup material, along with the total OC emissions from all solvents and cleanup materials employed, in tons per month.

F. **Miscellaneous Requirements**

1. None