

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 K004](#)
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- [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

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Part II - Special Terms and Conditions

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

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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

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Part II - Special Terms and Conditions

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

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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: K004 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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 permit to install for this emissions unit K004 was evaluated based on the actual 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 to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

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

*Combined emission rate from K003, K004, K005, K006, and K007.

3. 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 or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");

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.).
4. 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, 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 the 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.
- 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. None

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

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Part II - Special Terms and Conditions

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
- (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
- (a) None.
- A. Applicable Emissions Limitations and/or Control Requirements**
1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control</u>
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8-color flexographic printing press- Comco Commander OAC rule 3745-31-05 (PTI 16-1868)

Measures

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 permit to install for this emissions unit K005 was evaluated based on the actual 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 to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

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

*Combined emission rate from K003, K004, K005, K006, and K007.

3. 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 or the use of new materials, that would result in the

emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");

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.).

4. 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, 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 the 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.

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. None

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

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Part II - Special Terms and Conditions

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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 permit to install for this emissions unit K006 was evaluated based on the actual 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 to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

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

*Combined emission rate from K003, K004, K005, K006, and K007.

3. 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 or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
 - 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.).
4. 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, 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 the 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.
- 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. None

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

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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 permit to install for this emissions unit K007 was evaluated based on the actual 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 to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

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

*Combined emission rate from K003, K004, K005, K006, and K007.

3. 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 or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");

- 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.).

4. 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, 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 the 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.

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. None

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

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Part II - Special Terms and Conditions

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the

exception of those listed below which are enforceable under state law only.

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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