

Facility ID: 1677150028 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 P001](#)

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

Facility ID: 1677150028 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>
Bendazolli press 90" x 190", 2-color flexographic printer slotter with die cutter	OAC rule 3745-31-05 (PTI 16-1706)	6.36 lbs/hr organic compounds (OC) Combined annual emissions from all facility emissions units shall not exceed the following as rolling, 12-month summations: 95 tons of VOC and OC; 24 tons of all hazardous air pollutants (HAP); and 9.0 tons of any individual HAP. See B.4 below.
	OAC rule 3745-21-09(Y)	See D.5 below.
	40 CFR 63, Subpart KK	

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

B. Operational Restrictions

1. The emissions of volatile organic compounds (VOC) and organic compounds (OC), individual Hazardous Air Pollutant (HAP), and combined HAPs from this facility shall not exceed 95, 9.0, and 24 tons per year, respectively, based upon a rolling, 12-month summation of the monthly emissions.
2. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month(s)	VOC and OC (Tons)	Individual HAP (Tons)	Combined HAP (Tons)
1	7.92	0.75	2.0
1-2	15.83	1.50	4.0
1-3	23.75	2.25	6.0
1-4	31.67	3.00	8.0
1-5	39.58	3.75	10.0
1-6	47.50	4.50	12.0
1-7	55.42	5.25	14.0
1-8	63.33	6.00	16.0
1-9	71.25	6.75	18.0

1-10 79.17 7.50 20.0
 1-11 87.08 8.25 22.0
 1-12 95.00 9.00 24.0

3. After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations for VOC and OC, individual HAP, and combined HAP shall be based upon a rolling, 12-month summation of the monthly facility emissions.
4. The volatile organic compound (VOC) content of the coatings and inks employed in each printing line shall not exceed the following limitations:
 - a. forty per cent VOC by volume of coating and ink, excluding water; or
 - b. twenty-five per cent VOC by volume of the volatile matter in the coating and ink.

C. Monitoring and/or Record Keeping Requirements

1. In order to demonstrate compliance with the facility-wide emission limitations, the permittee shall maintain monthly records which contain the following information:
 - a. the name and company identification of each ink, coating, and cleanup material, as applied;
 - b. Material Safety Data Sheets from the supplier that list the VOC content of each ink, coating, and cleanup material, as applied, in pounds per gallon;
 - c. the number of gallons of each ink, coating, and cleanup material, as applied;
 - d. Material Safety Data Sheets from the supplier that list the percent, by weight, of each HAP for each ink, coating, and cleanup material; and
 - e. the VOC content in percentage VOC by volume of each coating and ink, excluding water and exempt solvents, or the VOC content in percentage VOC by volume of the volatile matter in each coating and ink.
2. The permittee shall, on a monthly basis, calculate and record for the entire facility (K001, K002, K003, K004, K005, K006, P001) the individual HAP, combined HAP, and VOC and OC emission rates, in tons per month, and in tons per rolling, 12-month period.

These mass emissions shall be calculated in accordance with the following methodology:

Facility individual HAP

summation of the pounds of each ink, coating, and cleanup material multiplied by the individual HAP content, in weight percent, for each individual HAP

Facility combined HAP

summation of all individual HAPs from the facility calculation

Facility VOC and OC emissions

summation of the gallons of each ink, coating, and cleanup material multiplied by the VOC content, in pounds/gallon

3. The permittee shall collect and record the following information each month for this emissions unit:
 - a. the number of hours the emissions unit was in operation;
 - b. the production of the emissions unit in thousand square feet (msf); and
 - c. the calculated hourly VOC emission rate, in pounds per hour (average)(line specific emissions are based on a production ratio multiplied times the facility-wide total VOC emissions).

The VOC emission rate shall be calculated in accordance with the following methodology:

Divide the production for each line, in msf, by the total production for the entire facility for the month, in msf, to obtain a production ratio for the line. Multiply the production ratio for the line by the total VOC emissions for the month (from C.2) to obtain the pounds of VOC per month per line. Divide the result by the hours of operation for the month for the line to obtain the average hourly VOC emission rate for the line.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility emission limitations for VOC and OC, individual HAP, and combined HAP, and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.
2. The permittee shall submit deviation (excursion) reports which identify any monthly record showing the use of noncomplying coatings or inks unless the daily record shows that the daily volume-weighted average VOC content of all coatings and inks employed on that day does not exceed the applicable emission limitation. The notification shall include a copy of such record and shall be sent to the Director (Akron Regional Air Quality Management) within 45 days after the exceedance occurs.
3. The permittee shall submit deviation (excursion) reports which include any record showing an exceedance of the hourly allowable mass emission rate for OC.
4. The deviation reports shall be submitted in accordance with the requirements specified in General Term and Condition 3.

5. The permittee shall submit an initial notification no later than 120 days after initial startup, as required in 40 CFR 63, Subpart KK.

E. Testing Requirements

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

6.36 lbs/hr of OC

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of Section C.3 of these terms and conditions.

USEPA Methods 24 and 24A shall be used to determine the VOC content for coatings, flexographic and rotogravure printing inks, and related coatings, respectively. If, pursuant to Section 4.3 of Method 24, 40 CFR Part 60, Appendix A, a permittee determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A. Formulation data shall be used to determine the VOC content of each cleanup material.

Emission Limitation:

95 TPY VOC and OC, facility-wide

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of Sections C.2 and C.3 of these terms and conditions.

USEPA Methods 24 and 24A shall be used to determine the VOC content for coatings, flexographic and rotogravure printing inks, and related coatings, respectively. If, pursuant to Section 4.3 of Method 24, 40 CFR Part 60, Appendix A, a permittee determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A. Formulation data shall be used to determine the VOC content of each cleanup material.

Emission Limitation:

24 TPY all HAPs, facility-wide

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of Sections C.2 and C.3 of these terms and conditions.

Formulation data shall be used to determine the HAP content for coatings, flexographic and rotogravure printing inks, cleanup materials, and related coatings, respectively.

Emission Limitation:

9.0 TPY any individual HAP, facility-wide

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of Sections C.2 and C.3 of these terms and conditions.

Formulation data shall be used to determine the HAP content for coatings, flexographic and rotogravure printing inks, cleanup materials, and related coatings, respectively.

Emission Limitation:

forty per cent VOC by volume of the coating and ink, excluding water or twenty-five per cent VOC by volume of the volatile matter in the coating and ink

Applicable Compliance Method:

OAC rule 3745-21-10(B). USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

F. Miscellaneous Requirements

1. None

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

Facility ID: 1677150028 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>
F & E press 66" x 170" 2-color flexographic printer slotter	OAC rule 3745-31-05 (PTI 16-1706)	6.36 lbs/hr organic compounds (OC) Combined annual emissions from all facility emissions units shall not exceed the following as rolling, 12-month summations: 95 tons of VOC and OC; 24 tons of all hazardous air pollutants (HAP); and 9.0 tons of any individual HAP. See B.4 below.
	OAC rule 3745-21-09(Y)	See D.5 below.
	40 CFR 63, Subpart KK	

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

B. Operational Restrictions

1. The emissions of volatile organic compounds (VOC) and organic compounds (OC), individual Hazardous Air Pollutant (HAP), and combined HAPs from this facility shall not exceed 95, 9.0, and 24 tons per year, respectively, based upon a rolling, 12-month summation of the monthly emissions.
2. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

	Maximum Allowable	Maximum Allowable	Maximum Allowable
	Cumulative Emissions	Cumulative Emissions	Cumulative Emissions
Month(s) of VOC and OC (Tons)	Individual HAP (Tons)	Combined HAP (Tons)	
1	7.92	0.75	2.0
1-2	15.83	1.50	4.0
1-3	23.75	2.25	6.0
1-4	31.67	3.00	8.0
1-5	39.58	3.75	10.0
1-6	47.50	4.50	12.0
1-7	55.42	5.25	14.0
1-8	63.33	6.00	16.0
1-9	71.25	6.75	18.0
1-10	79.17	7.50	20.0
1-11	87.08	8.25	22.0
1-12	95.00	9.00	24.0
3. After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations for VOC and OC, individual HAP, and combined HAP shall be based upon a rolling, 12-month summation of the monthly facility emissions.
4. The volatile organic compound (VOC) content of the coatings and inks employed in each printing line shall not exceed the following limitations:
 - a. forty per cent VOC by volume of coating and ink, excluding water; or
 - b. twenty-five per cent VOC by volume of the volatile matter in the coating and ink.

C. Monitoring and/or Record Keeping Requirements

1. In order to demonstrate compliance with the facility-wide emission limitations, the permittee shall maintain monthly records which contain the following information:
 - a. the name and company identification of each ink, coating, and cleanup material, as applied;

- b. Material Safety Data Sheets from the supplier that list the VOC content of each ink, coating, and cleanup material, as applied, in pounds per gallon;
 - c. the number of gallons of each ink, coating, and cleanup material, as applied;
 - d. Material Safety Data Sheets from the supplier that list the percent, by weight, of each HAP for each ink, coating, and cleanup material; and
 - e. the VOC content in percentage VOC by volume of each coating and ink, excluding water and exempt solvents, or the VOC content in percentage VOC by volume of the volatile matter in each coating and ink.
2. The permittee shall, on a monthly basis, calculate and record for the entire facility (K001, K002, K003, K004, K005, K006, P001) the individual HAP, combined HAP, and VOC and OC emission rates, in tons per month, and in tons per rolling, 12-month period.

These mass emissions shall be calculated in accordance with the following methodology:

Facility individual HAP

summation of the pounds of each ink, coating, and cleanup material multiplied by the individual HAP content, in weight percent, for each individual HAP

Facility combined HAP

summation of all individual HAPs from the facility calculation

Facility VOC and OC emissions

summation of the gallons of each ink, coating, and cleanup material multiplied by the VOC content, in pounds/gallon

3. The permittee shall collect and record the following information each month for this emissions unit:
- a. the number of hours the emissions unit was in operation;
 - b. the production of the emissions unit in thousand square feet (msf); and
 - c. the calculated hourly VOC emission rate, in pounds per hour (average)(line specific emissions are based on a production ratio multiplied times the facility-wide total VOC emissions).

The VOC emission rate shall be calculated in accordance with the following methodology:

Divide the production for each line, in msf, by the total production for the entire facility for the month, in msf, to obtain a production ratio for the line. Multiply the production ratio for the line by the total VOC emissions for the month (from C.2) to obtain the pounds of VOC per month per line. Divide the result by the hours of operation for the month for the line to obtain the average hourly VOC emission rate for the line.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility emission limitations for VOC and OC, individual HAP, and combined HAP, and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.
2. The permittee shall submit deviation (excursion) reports which identify any monthly record showing the use of noncomplying coatings or inks unless the daily record shows that the daily volume-weighted average VOC content of all coatings and inks employed on that day does not exceed the applicable emission limitation. The notification shall include a copy of such record and shall be sent to the Director (Akron Regional Air Quality Management) within 45 days after the exceedance occurs.
3. The permittee shall submit deviation (excursion) reports which include any record showing an exceedance of the hourly allowable mass emission rate for OC.
4. The deviation reports shall be submitted in accordance with the requirements specified in General Term and Condition 3.
5. The permittee shall submit an initial notification no later than 120 days after initial startup, as required in 40 CFR 63, Subpart KK.

E. Testing Requirements

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

6.36 lbs/hr of OC

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of Section C.3 of these terms and conditions.

USEPA Methods 24 and 24A shall be used to determine the VOC content for coatings, flexographic and rotogravure printing inks, and related coatings, respectively. If, pursuant to Section 4.3 of Method 24, 40 CFR Part 60, Appendix A, a permittee determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative

precision statements for Method 24 or 24A. Formulation data shall be used to determine the VOC content of each cleanup material.

Emission Limitation:

95 TPY VOC and OC, facility-wide

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of Sections C.2 and C.3 of these terms and conditions.

USEPA Methods 24 and 24A shall be used to determine the VOC content for coatings, flexographic and rotogravure printing inks, and related coatings, respectively. If, pursuant to Section 4.3 of Method 24, 40 CFR Part 60, Appendix A, a permittee determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A. Formulation data shall be used to determine the VOC content of each cleanup material.

Emission Limitation:

24 TPY all HAPs, facility-wide

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of Sections C.2 and C.3 of these terms and conditions.

Formulation data shall be used to determine the HAP content for coatings, flexographic and rotogravure printing inks, cleanup materials, and related coatings, respectively.

Emission Limitation:

9.0 TPY any individual HAP, facility-wide

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of Sections C.2 and C.3 of these terms and conditions.

Formulation data shall be used to determine the HAP content for coatings, flexographic and rotogravure printing inks, cleanup materials, and related coatings, respectively.

Emission Limitation:

forty per cent VOC by volume of the coating and ink, excluding water or twenty-five per cent VOC by volume of the volatile matter in the coating and ink

Applicable Compliance Method:

OAC rule 3745-21-10(B). USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

F. Miscellaneous Requirements

1. None

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

Facility ID: 1677150028 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>
Ward press 66" x 80" 2-color flexographic die cutter	OAC rule 3745-31-05 (PTI 16-1706)	6.36 lbs/hr organic compounds (OC) Combined annual emissions from all facility emissions units shall not exceed the following as rolling, 12-month summations: 95 tons of VOC and OC; 24 tons of all hazardous air pollutants (HAP); and 9.0 tons of any individual HAP. See B.4 below.
	OAC rule 3745-21-09(Y)	See D.5 below.
	40 CFR 63, Subpart KK	

2. **Additional Terms and Conditions**

(a) None

B. **Operational Restrictions**

1. The emissions of volatile organic compounds (VOC) and organic compounds (OC), individual Hazardous Air Pollutant (HAP), and combined HAPs from this facility shall not exceed 95, 9.0, and 24 tons per year, respectively, based upon a rolling, 12-month summation of the monthly emissions.
2. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month(s) of VOC and OC (Tons)	Individual HAP (Tons)	Combined HAP (Tons)
1	7.92	0.75
1-2	15.83	1.50
1-3	23.75	2.25
1-4	31.67	3.00
1-5	39.58	3.75
1-6	47.50	4.50
1-7	55.42	5.25
1-8	63.33	6.00
1-9	71.25	6.75
1-10	79.17	7.50
1-11	87.08	8.25
1-12	95.00	9.00
3. After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations for VOC and OC, individual HAP, and combined HAP shall be based upon a rolling, 12-month summation of the monthly facility emissions.
4. The volatile organic compound (VOC) content of the coatings and inks employed in each printing line shall not exceed the following limitations:
 - a. forty per cent VOC by volume of coating and ink, excluding water; or
 - b. twenty-five per cent VOC by volume of the volatile matter in the coating and ink.

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

1. In order to demonstrate compliance with the facility-wide emission limitations, the permittee shall maintain monthly records which contain the following information:
 - a. the name and company identification of each ink, coating, and cleanup material, as applied;
 - b. Material Safety Data Sheets from the supplier that list the VOC content of each ink, coating, and cleanup material, as applied, in pounds per gallon;
 - c. the number of gallons of each ink, coating, and cleanup material, as applied;
 - d. Material Safety Data Sheets from the supplier that list the percent, by weight, of each HAP for each ink, coating, and cleanup material; and
 - e. the VOC content in percentage VOC by volume of each coating and ink, excluding water and exempt solvents, or the VOC content in percentage VOC by volume of the volatile matter in each coating and ink.
2. The permittee shall, on a monthly basis, calculate and record for the entire facility (K001, K002, K003, K004, K005, K006, P001) the individual HAP, combined HAP, and VOC and OC emission rates, in tons per month, and in tons per rolling, 12-month period.

These mass emissions shall be calculated in accordance with the following methodology:

Facility individual HAP

summation of the pounds of each ink, coating, and cleanup material multiplied by the individual HAP content, in

weight percent, for each individual HAP

Facility combined HAP

summation of all individual HAPs from the facility calculation

Facility VOC and OC emissions

summation of the gallons of each ink, coating, and cleanup material multiplied by the VOC content, in pounds/gallon

3. The permittee shall collect and record the following information each month for this emissions unit:

- a. the number of hours the emissions unit was in operation;
- b. the production of the emissions unit in thousand square feet (msf); and
- c. the calculated hourly VOC emission rate, in pounds per hour (average)(line specific emissions are based on a production ratio multiplied times the facility-wide total VOC emissions).

The VOC emission rate shall be calculated in accordance with the following methodology:

Divide the production for each line, in msf, by the total production for the entire facility for the month, in msf, to obtain a production ratio for the line. Multiply the production ratio for the line by the total VOC emissions for the month (from C.2) to obtain the pounds of VOC per month per line. Divide the result by the hours of operation for the month for the line to obtain the average hourly VOC emission rate for the line.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility emission limitations for VOC and OC, individual HAP, and combined HAP, and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.
2. The permittee shall submit deviation (excursion) reports which identify any monthly record showing the use of noncomplying coatings or inks unless the daily record shows that the daily volume-weighted average VOC content of all coatings and inks employed on that day does not exceed the applicable emission limitation. The notification shall include a copy of such record and shall be sent to the Director (Akron Regional Air Quality Management) within 45 days after the exceedance occurs.
3. The permittee shall submit deviation (excursion) reports which include any record showing an exceedance of the hourly allowable mass emission rate for OC.
4. The deviation reports shall be submitted in accordance with the requirements specified in General Term and Condition 3.
5. The permittee shall submit an initial notification no later than 120 days after initial startup, as required in 40 CFR 63, Subpart KK.

E. Testing Requirements

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

Emission Limitation:

6.36 lbs/hr of OC

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of Section C.3 of these terms and conditions.

USEPA Methods 24 and 24A shall be used to determine the VOC content for coatings, flexographic and rotogravure printing inks, and related coatings, respectively. If, pursuant to Section 4.3 of Method 24, 40 CFR Part 60, Appendix A, a permittee determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A. Formulation data shall be used to determine the VOC content of each cleanup material.

Emission Limitation:

95 TPY VOC and OC, facility-wide

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of Sections C.2 and C.3 of these terms and conditions.

USEPA Methods 24 and 24A shall be used to determine the VOC content for coatings, flexographic and rotogravure printing inks, and related coatings, respectively. If, pursuant to Section 4.3 of Method 24, 40 CFR Part 60, Appendix A, a permittee determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A. Formulation data shall be used to determine the VOC content of each cleanup material.

Emission Limitation:

24 TPY all HAPs, facility-wide

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of Sections C.2 and C.3 of these terms and conditions.

Formulation data shall be used to determine the HAP content for coatings, flexographic and rotogravure printing inks, cleanup materials, and related coatings, respectively.
Emission Limitation:

9.0 TPY any individual HAP, facility-wide

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of Sections C.2 and C.3 of these terms and conditions.

Formulation data shall be used to determine the HAP content for coatings, flexographic and rotogravure printing inks, cleanup materials, and related coatings, respectively.
Emission Limitation:

forty per cent VOC by volume of the coating and ink, excluding water or twenty-five per cent VOC by volume of the volatile matter in the coating and ink

Applicable Compliance Method:

OAC rule 3745-21-10(B). USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

F. **Miscellaneous Requirements**

- 1. None

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

Facility ID: 1677150028 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>
Langston press 38" x 113" 2-color flexographic color gluer	OAC rule 3745-31-05 (PTI 16-1706)	6.70 lbs/hr organic compounds (OC) Combined annual emissions from all facility emissions units shall not exceed the following as rolling, 12-month summations: 95 tons of VOC and OC; 24 tons of all hazardous air pollutants (HAP); and 9.0 tons of any individual HAP.
		See B.4 below.
	OAC rule 3745-21-09(Y)	See D.5 below.

40 CFR 63, Subpart KK

2. **Additional Terms and Conditions**

(a) None

B. **Operational Restrictions**

1. The emissions of volatile organic compounds (VOC) and organic compounds (OC), individual Hazardous Air Pollutant (HAP), and combined HAPs from this facility shall not exceed 95, 9.0, and 24 tons per year, respectively, based upon a rolling, 12-month summation of the monthly emissions.
2. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

	Maximum Allowable	Maximum Allowable	Maximum Allowable
	Cumulative Emissions	Cumulative Emissions	Cumulative Emissions
Month(s) of VOC and OC (Tons)	Individual HAP (Tons)	Combined HAP (Tons)	
1	7.92	0.75	2.0
1-2	15.83	1.50	4.0
1-3	23.75	2.25	6.0
1-4	31.67	3.00	8.0
1-5	39.58	3.75	10.0
1-6	47.50	4.50	12.0
1-7	55.42	5.25	14.0
1-8	63.33	6.00	16.0
1-9	71.25	6.75	18.0
1-10	79.17	7.50	20.0
1-11	87.08	8.25	22.0
1-12	95.00	9.00	24.0
3. After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations for VOC and OC, individual HAP, and combined HAP shall be based upon a rolling, 12-month summation of the monthly facility emissions.
4. The volatile organic compound (VOC) content of the coatings and inks employed in each printing line shall not exceed the following limitations:
 - a. forty per cent VOC by volume of coating and ink, excluding water; or
 - b. twenty-five per cent VOC by volume of the volatile matter in the coating and ink.

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

1. In order to demonstrate compliance with the facility-wide emission limitations, the permittee shall maintain monthly records which contain the following information:
 - a. the name and company identification of each ink, coating, and cleanup material, as applied;
 - b. Material Safety Data Sheets from the supplier that list the VOC content of each ink, coating, and cleanup material, as applied, in pounds per gallon;
 - c. the number of gallons of each ink, coating, and cleanup material, as applied;
 - d. Material Safety Data Sheets from the supplier that list the percent, by weight, of each HAP for each ink, coating, and cleanup material; and
 - e. the VOC content in percentage VOC by volume of each coating and ink, excluding water and exempt solvents, or the VOC content in percentage VOC by volume of the volatile matter in each coating and ink.
2. The permittee shall, on a monthly basis, calculate and record for the entire facility (K001, K002, K003, K004, K005, K006, P001) the individual HAP, combined HAP, and VOC and OC emission rates, in tons per month, and in tons per rolling, 12-month period.

 These mass emissions shall be calculated in accordance with the following methodology:

 Facility individual HAP

 summation of the pounds of each ink, coating, and cleanup material multiplied by the individual HAP content, in weight percent, for each individual HAP

 Facility combined HAP

 summation of all individual HAPs from the facility calculation

 Facility VOC and OC emissions

 summation of the gallons of each ink, coating, and cleanup material multiplied by the VOC content, in pounds/gallon
3. The permittee shall collect and record the following information each month for this emissions unit:
 - a. the number of hours the emissions unit was in operation;
 - b. the production of the emissions unit in thousand square feet (msf); and
 - c. the calculated hourly VOC emission rate, in pounds per hour (average)(line specific emissions are based on a production ratio multiplied times the facility-wide total VOC emissions).

The VOC emission rate shall be calculated in accordance with the following methodology:

Divide the production for each line, in msf, by the total production for the entire facility for the month, in msf, to obtain a production ratio for the line. Multiply the production ratio for the line by the total VOC emissions for the month (from C.2) to obtain the pounds of VOC per month per line. Divide the result by the hours of operation for the month for the line to obtain the average hourly VOC emission rate for the line.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility emission limitations for VOC and OC, individual HAP, and combined HAP, and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.
2. The permittee shall submit deviation (excursion) reports which identify any monthly record showing the use of noncomplying coatings or inks unless the daily record shows that the daily volume-weighted average VOC content of all coatings and inks employed on that day does not exceed the applicable emission limitation. The notification shall include a copy of such record and shall be sent to the Director (Akron Regional Air Quality Management) within 45 days after the exceedance occurs.
3. The permittee shall submit deviation (excursion) reports which include any record showing an exceedance of the hourly allowable mass emission rate for OC.
4. The deviation reports shall be submitted in accordance with the requirements specified in General Term and Condition 3.
5. The permittee shall submit an initial notification no later than 120 days after initial startup, as required in 40 CFR 63, Subpart KK.

E. Testing Requirements

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

Emission Limitation:

6.70 lbs/hr of OC

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of Section C.3 of these terms and conditions.

USEPA Methods 24 and 24A shall be used to determine the VOC content for coatings, flexographic and rotogravure printing inks, and related coatings, respectively. If, pursuant to Section 4.3 of Method 24, 40 CFR Part 60, Appendix A, a permittee determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A. Formulation data shall be used to determine the VOC content of each cleanup material.

Emission Limitation:

95 TPY VOC and OC, facility-wide

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of Sections C.2 and C.3 of these terms and conditions.

USEPA Methods 24 and 24A shall be used to determine the VOC content for coatings, flexographic and rotogravure printing inks, and related coatings, respectively. If, pursuant to Section 4.3 of Method 24, 40 CFR Part 60, Appendix A, a permittee determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A. Formulation data shall be used to determine the VOC content of each cleanup material.

Emission Limitation:

24 TPY all HAPs, facility-wide

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of Sections C.2 and C.3 of these terms and conditions.

Formulation data shall be used to determine the HAP content for coatings, flexographic and rotogravure printing inks, cleanup materials, and related coatings, respectively.

Emission Limitation:

9.0 TPY any individual HAP, facility-wide

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of Sections C.2 and C.3 of these terms and conditions.

Formulation data shall be used to determine the HAP content for coatings, flexographic and rotogravure printing inks, cleanup materials, and related coatings, respectively.

Emission Limitation:

forty per cent VOC by volume of the coating and ink, excluding water or twenty-five per cent VOC by volume of the volatile matter in the coating and ink

Applicable Compliance Method:

OAC rule 3745-21-10(B). USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

F. Miscellaneous Requirements

- 1. None

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

Facility ID: 1677150028 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>
Langston press 37.5" x 80" 2-color flexographic folder gluer	OAC rule 3745-31-05 (PTI 16-1706)	6.70 lbs/hr organic compounds (OC) Combined annual emissions from all facility emissions units shall not exceed the following as rolling, 12-month summations: 95 tons of VOC and OC; 24 tons of all hazardous air pollutants (HAP); and 9.0 tons of any individual HAP. See B.4 below.
	OAC rule 3745-21-09(Y) 40 CFR 63, Subpart KK	See D.5 below.

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

B. Operational Restrictions

- 1. The emissions of volatile organic compounds (VOC) and organic compounds (OC), individual Hazardous Air Pollutant (HAP), and combined HAPs from this facility shall not exceed 95, 9.0, and 24 tons per year, respectively, based upon a rolling, 12-month summation of the monthly emissions.
- 2. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

	Maximum Allowable	Maximum Allowable	Maximum Allowable
	Cumulative Emissions	Cumulative Emissions	Cumulative Emissions
Month(s) of VOC and OC (Tons)	of Individual HAP (Tons)	Combined HAP (Tons)	
1	7.92	0.75	2.0
1-2	15.83	1.50	4.0
1-3	23.75	2.25	6.0
1-4	31.67	3.00	8.0

1-5 39.58 3.75 10.0
 1-6 47.50 4.50 12.0
 1-7 55.42 5.25 14.0
 1-8 63.33 6.00 16.0
 1-9 71.25 6.75 18.0
 1-10 79.17 7.50 20.0
 1-11 87.08 8.25 22.0
 1-12 95.00 9.00 24.0

3. After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations for VOC and OC, individual HAP, and combined HAP shall be based upon a rolling, 12-month summation of the monthly facility emissions.
4. The volatile organic compound (VOC) content of the coatings and inks employed in each printing line shall not exceed the following limitations:
 - a. forty per cent VOC by volume of coating and ink, excluding water; or
 - b. twenty-five per cent VOC by volume of the volatile matter in the coating and ink.

C. Monitoring and/or Record Keeping Requirements

1. In order to demonstrate compliance with the facility-wide emission limitations, the permittee shall maintain monthly records which contain the following information:
 - a. the name and company identification of each ink, coating, and cleanup material, as applied;
 - b. Material Safety Data Sheets from the supplier that list the VOC content of each ink, coating, and cleanup material, as applied, in pounds per gallon;
 - c. the number of gallons of each ink, coating, and cleanup material, as applied;
 - d. Material Safety Data Sheets from the supplier that list the percent, by weight, of each HAP for each ink, coating, and cleanup material; and
 - e. the VOC content in percentage VOC by volume of each coating and ink, excluding water and exempt solvents, or the VOC content in percentage VOC by volume of the volatile matter in each coating and ink.
2. The permittee shall, on a monthly basis, calculate and record for the entire facility (K001, K002, K003, K004, K005, K006, P001) the individual HAP, combined HAP, and VOC and OC emission rates, in tons per month, and in tons per rolling, 12-month period.

These mass emissions shall be calculated in accordance with the following methodology:

Facility individual HAP

summation of the pounds of each ink, coating, and cleanup material multiplied by the individual HAP content, in weight percent, for each individual HAP

Facility combined HAP

summation of all individual HAPs from the facility calculation

Facility VOC and OC emissions

summation of the gallons of each ink, coating, and cleanup material multiplied by the VOC content, in pounds/gallon

3. The permittee shall collect and record the following information each month for this emissions unit:
 - a. the number of hours the emissions unit was in operation;
 - b. the production of the emissions unit in thousand square feet (msf); and
 - c. the calculated hourly VOC emission rate, in pounds per hour (average)(line specific emissions are based on a production ratio multiplied times the facility-wide total VOC emissions).

The VOC emission rate shall be calculated in accordance with the following methodology:

Divide the production for each line, in msf, by the total production for the entire facility for the month, in msf, to obtain a production ratio for the line. Multiply the production ratio for the line by the total VOC emissions for the month (from C.2) to obtain the pounds of VOC per month per line. Divide the result by the hours of operation for the month for the line to obtain the average hourly VOC emission rate for the line.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility emission limitations for VOC and OC, individual HAP, and combined HAP, and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.
2. The permittee shall submit deviation (excursion) reports which identify any monthly record showing the use of noncomplying coatings or inks unless the daily record shows that the daily volume-weighted average VOC content of all coatings and inks employed on that day does not exceed the applicable emission limitation. The notification shall include a copy of such record and shall be sent to the Director (Akron Regional Air Quality Management) within 45 days after the exceedance occurs.
3. The permittee shall submit deviation (excursion) reports which include any record showing an exceedance of the

hourly allowable mass emission rate for OC.

4. The deviation reports shall be submitted in accordance with the requirements specified in General Term and Condition 3.
5. The permittee shall submit an initial notification no later than 120 days after initial startup, as required in 40 CFR 63, Subpart KK.

E. Testing Requirements

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

Emission Limitation:

6.70 lbs/hr of OC

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of Section C.3 of these terms and conditions.

USEPA Methods 24 and 24A shall be used to determine the VOC content for coatings, flexographic and rotogravure printing inks, and related coatings, respectively. If, pursuant to Section 4.3 of Method 24, 40 CFR Part 60, Appendix A, a permittee determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A. Formulation data shall be used to determine the VOC content of each cleanup material.

Emission Limitation:

95 TPY VOC and OC, facility-wide

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of Sections C.2 and C.3 of these terms and conditions.

USEPA Methods 24 and 24A shall be used to determine the VOC content for coatings, flexographic and rotogravure printing inks, and related coatings, respectively. If, pursuant to Section 4.3 of Method 24, 40 CFR Part 60, Appendix A, a permittee determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A. Formulation data shall be used to determine the VOC content of each cleanup material.

Emission Limitation:

24 TPY all HAPs, facility-wide

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of Sections C.2 and C.3 of these terms and conditions.

Formulation data shall be used to determine the HAP content for coatings, flexographic and rotogravure printing inks, cleanup materials, and related coatings, respectively.

Emission Limitation:

9.0 TPY any individual HAP, facility-wide

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of Sections C.2 and C.3 of these terms and conditions.

Formulation data shall be used to determine the HAP content for coatings, flexographic and rotogravure printing inks, cleanup materials, and related coatings, respectively.

Emission Limitation:

forty per cent VOC by volume of the coating and ink, excluding water or twenty-five per cent VOC by volume of the volatile matter in the coating and ink

Applicable Compliance Method:

OAC rule 3745-21-10(B). USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

F. Miscellaneous Requirements

1. None

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

Facility ID: 1677150028 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>
Black Brothers laminator with glue unit	OAC rule 3745-31-05 (PTI 16-1706)	1.17 lbs/hr organic compounds (OC) Combined annual emissions from all facility emissions units shall not exceed the following as rolling, 12-month summations: 95 tons of VOC and OC; 24 tons of all hazardous air pollutants (HAP); and 9.0 tons of any individual HAP. See B.4 below.
	OAC rule 3745-21-09(Y)	See D.5 below.
	40 CFR 63, Subpart KK	

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

B. Operational Restrictions

1. The emissions of volatile organic compounds (VOC) and organic compounds (OC), individual Hazardous Air Pollutant (HAP), and combined HAPs from this facility shall not exceed 95, 9.0, and 24 tons per year, respectively, based upon a rolling, 12-month summation of the monthly emissions.
2. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month(s) of VOC and OC (Tons)	Maximum Allowable	Cumulative Emissions	Maximum Allowable	Cumulative Emissions	Maximum Allowable	Cumulative Emissions		
Month(s) of VOC and OC (Tons)	Individual HAP (Tons)	Combined HAP (Tons)	Month(s) of VOC and OC (Tons)	Individual HAP (Tons)	Combined HAP (Tons)	Month(s) of VOC and OC (Tons)	Individual HAP (Tons)	Combined HAP (Tons)
1	7.92	0.75	2.0					
1-2	15.83	1.50	4.0					
1-3	23.75	2.25	6.0					
1-4	31.67	3.00	8.0					
1-5	39.58	3.75	10.0					
1-6	47.50	4.50	12.0					
1-7	55.42	5.25	14.0					
1-8	63.33	6.00	16.0					
1-9	71.25	6.75	18.0					
1-10	79.17	7.50	20.0					
1-11	87.08	8.25	22.0					
1-12	95.00	9.00	24.0					
3. After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations for VOC and OC, individual HAP, and combined HAP shall be based upon a rolling, 12-month summation of the monthly facility emissions.
4. The volatile organic compound (VOC) content of the coatings and inks employed in each printing line shall not exceed the following limitations:
 - a. forty per cent VOC by volume of coating and ink, excluding water; or
 - b. twenty-five per cent VOC by volume of the volatile matter in the coating and ink.

C. Monitoring and/or Record Keeping Requirements

1. In order to demonstrate compliance with the facility-wide emission limitations, the permittee shall maintain monthly records which contain the following information:
 - a. the name and company identification of each ink, coating, and cleanup material, as applied;
 - b. Material Safety Data Sheets from the supplier that list the VOC content of each ink, coating, and cleanup material, as applied, in pounds per gallon;
 - c. the number of gallons of each ink, coating, and cleanup material, as applied;
 - d. Material Safety Data Sheets from the supplier that list the percent, by weight, of each HAP for each ink, coating, and cleanup material; and
 - e. the VOC content in percentage VOC by volume of each coating and ink, excluding water and exempt solvents, or the VOC content in percentage VOC by volume of the volatile matter in each coating and ink.
2. The permittee shall, on a monthly basis, calculate and record for the entire facility (K001, K002, K003, K004, K005, K006, P001) the individual HAP, combined HAP, and VOC and OC emission rates, in tons per month, and in tons per rolling, 12-month period.

These mass emissions shall be calculated in accordance with the following methodology:

Facility individual HAP

summation of the pounds of each ink, coating, and cleanup material multiplied by the individual HAP content, in weight percent, for each individual HAP

Facility combined HAP

summation of all individual HAPs from the facility calculation

Facility VOC and OC emissions

summation of the gallons of each ink, coating, and cleanup material multiplied by the VOC content, in pounds/gallon

3. The permittee shall collect and record the following information each month for this emissions unit:
 - a. the number of hours the emissions unit was in operation;
 - b. the production of the emissions unit in thousand square feet (msf); and
 - c. the calculated hourly VOC emission rate, in pounds per hour (average)(line specific emissions are based on a production ratio multiplied times the facility-wide total VOC emissions).

The VOC emission rate shall be calculated in accordance with the following methodology:

Divide the production for each line, in msf, by the total production for the entire facility for the month, in msf, to obtain a production ratio for the line. Multiply the production ratio for the line by the total VOC emissions for the month (from C.2) to obtain the pounds of VOC per month per line. Divide the result by the hours of operation for the month for the line to obtain the average hourly VOC emission rate for the line.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility emission limitations for VOC and OC, individual HAP, and combined HAP, and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.
2. The permittee shall submit deviation (excursion) reports which identify any monthly record showing the use of noncomplying coatings or inks unless the daily record shows that the daily volume-weighted average VOC content of all coatings and inks employed on that day does not exceed the applicable emission limitation. The notification shall include a copy of such record and shall be sent to the Director (Akron Regional Air Quality Management) within 45 days after the exceedance occurs.
3. The permittee shall submit deviation (excursion) reports which include any record showing an exceedance of the hourly allowable mass emission rate for OC.
4. The deviation reports shall be submitted in accordance with the requirements specified in General Term and Condition 3.
5. The permittee shall submit an initial notification no later than 120 days after initial startup, as required in 40 CFR 63, Subpart KK.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:
Emission Limitation:
1.17 lbs/hr of OC
Applicable Compliance Method:
The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of Section C.3 of these terms and conditions.
USEPA Methods 24 and 24A shall be used to determine the VOC content for coatings, flexographic and

rotogravure printing inks, and related coatings, respectively. If, pursuant to Section 4.3 of Method 24, 40 CFR Part 60, Appendix A, a permittee determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A. Formulation data shall be used to determine the VOC content of each cleanup material.

Emission Limitation:

95 TPY VOC and OC, facility-wide

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of Sections C.2 and C.3 of these terms and conditions.

USEPA Methods 24 and 24A shall be used to determine the VOC content for coatings, flexographic and rotogravure printing inks, and related coatings, respectively. If, pursuant to Section 4.3 of Method 24, 40 CFR Part 60, Appendix A, a permittee determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A. Formulation data shall be used to determine the VOC content of each cleanup material.

Emission Limitation:

24 TPY all HAPs, facility-wide

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of Sections C.2 and C.3 of these terms and conditions.

Formulation data shall be used to determine the HAP content for coatings, flexographic and rotogravure printing inks, cleanup materials, and related coatings, respectively.

Emission Limitation:

9.0 TPY any individual HAP, facility-wide

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of Sections C.2 and C.3 of these terms and conditions.

Formulation data shall be used to determine the HAP content for coatings, flexographic and rotogravure printing inks, cleanup materials, and related coatings, respectively.

Emission Limitation:

forty per cent VOC by volume of the coating and ink, excluding water or twenty-five per cent VOC by volume of the volatile matter in the coating and ink

Applicable Compliance Method:

OAC rule 3745-21-10(B). USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

F. Miscellaneous Requirements

1. None

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

Facility ID: 1677150028 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>
Starch storage silo, supplies corn starch to the starch kitchen	OAC rule 3745-31-05 (PTI 16-1706)	0.69 lb/hr particulate matter 3.0 TPY particulate matter 1% opacity as a 6-minute average Combined annual emissions from all facility emissions units shall not exceed the following as rolling, 12-month summations: 95 tons of VOC and OC; 24 tons of all hazardous air pollutants (HAP); and 9.0 tons of any individual HAP. See A.2.a below.
	OAC rule 3745-17-07	See A.2.a below.
	OAC rule 3745-17-11	

2. Additional Terms and Conditions

- (a) The emissions limit based on this rule is less stringent than the limit established pursuant to OAC rule 3745-31-05.

B. Operational Restrictions

1. The emissions of volatile organic compounds (VOC) and organic compounds (OC), individual Hazardous Air Pollutant (HAP), and combined HAPs from this facility shall not exceed 95, 9.0, and 24 tons per year, respectively, based upon a rolling, 12-month summation of the monthly emissions.
1. . Maximum Allowable Maximum Allowable Maximum Allowable
. Cumulative Emissions Cumulative Emissions Cumulative Emissions
Month(s) of VOC and OC (Tons) of Individual HAP (Tons) Combined HAP (Tons)
1 7.92 0.75 2.0
1-2 15.83 1.50 4.0
1-3 23.75 2.25 6.0
1-4 31.67 3.00 8.0
1-5 39.58 3.75 10.0
1-6 47.50 4.50 12.0
1-7 55.42 5.25 14.0
1-8 63.33 6.00 16.0
1-9 71.25 6.75 18.0
1-10 79.17 7.50 20.0
1-11 87.08 8.25 22.0
1-12 95.00 9.00 24.0
3. After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations for VOC and OC, individual HAP, and combined HAP shall be based upon a rolling, 12-month summation of the monthly facility emissions.
4. A baghouse filter shall be operated in accordance with the manufacturer's written recommendation at all times that corn starch is transferred either to or from the storage silo.
5. The permittee shall only store corn starch in the emissions unit.

C. Monitoring and/or Record Keeping Requirements

1. In order to demonstrate compliance with the facility-wide emission limitations, the permittee shall maintain monthly records which contain the following information:
 - a. the name and company identification of each ink, coating, and cleanup material, as applied;
 - b. Material Safety Data Sheets from the supplier that list the VOC content of each ink, coating, and cleanup material, as applied, in pounds per gallon;
 - c. the number of gallons of each ink, coating, and cleanup material, as applied; and
 - d. Material Safety Data Sheets from the supplier that list the percent, by weight, of each HAP for each ink, coating, and cleanup material.
2. The permittee shall on a monthly basis, calculate and record for the entire facility (K001, K002, K003, K004, K005, K006, P001) the individual HAP, combined HAP, and VOC and OC emission rates, in tons per month.
3. The permittee shall record the throughput of corn starch on a monthly basis, in pounds per day.

D. Reporting Requirements

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

cumulative emission levels.

E. Testing Requirements

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

0.69 lb/hr of particulate matter
3.0 TPY of particulate matter

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance by testing in accordance with Method 5, 40 CFR Part 60, Appendix A.

Emission Limitation:

1% opacity as a 6-minute average

Applicable Compliance Method:

OAC rule 3745-17-03(B)(3)

Emission Limitation:

95 TPY VOC and OC, facility-wide

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of Sections C.2 and C.3 of the terms and conditions for emissions units K001-K006.

USEPA Methods 24 and 24A shall be used to determine the VOC content for coatings, flexographic and rotogravure printing inks, and related coatings, respectively. If, pursuant to Section 4.3 of Method 24, 40 CFR Part 60, Appendix A, a permittee determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A. Formulation data shall be used to determine the VOC content of each cleanup material.

Emission Limitation:

24 TPY all HAPs, facility-wide

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of Sections C.2 and C.3 of the terms and conditions for emissions units K001-K006.

Formulation data shall be used to determine the HAP content for coatings, flexographic and rotogravure printing inks, cleanup materials, and related coatings, respectively.

Emission Limitation:

9.0 TPY any individual HAP, facility-wide

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of Sections C.2 and C.3 of the terms and conditions for emissions units K001-K006.

Formulation data shall be used to determine the HAP content for coatings, flexographic and rotogravure printing inks, cleanup materials, and related coatings, respectively.

F. Miscellaneous Requirements

1. None