

Facility ID: 0125040942 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.

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Facility ID: 0125040942 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> |
|---|---|---|
| W&H flexographic printing press | OAC rule 3745-21-09(Y)(1)(a) OAC rule 3745-31-05 (PTI # 01-6898) | The volatile organic compound (VOC) content of the coatings and inks employed in this emissions unit shall not exceed 40% VOC by volume of the coating and ink, excluding water; or 25% VOC by volume of the volatile matter in the coating and ink. VOC emissions shall not exceed 9.05 lbs/hr** and 39.6 tons/yr. The VOC content of the cleanup material(s) employed in this emissions unit shall not exceed 0%. The maximum VOC content of each coating and ink employed in this emissions unit shall not exceed 1.6 lbs/gallon (excluding water and exempt solvents), as applied. |

2. Additional Terms and Conditions

- (a) ** - The 9.05 lbs of VOC/hr emission limitation reflects the emissions unit's maximum hourly emission rate (maximum hourly coating usage rate times the maximum allowable VOC coating content), and, therefore, there are no record keeping or reporting requirements associated with this emission limitation.
Because each coating and ink employed in this emissions unit can comply with the specified VOC content limitations, as applied, the records normally required to determine the daily volume-weighted average of all coating materials employed are not necessary.

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 the line:
 - a. The name and identification number of each coating, as applied.
 - b. Amount of each coating employed, in gallons.
 - c. The VOC content of each coating, as applied, in lbs/gallon (excluding water and exempt solvents) and either percent by volume of the coating and ink (excluding water), or percent by volume of the volatile matter in the coating and ink.
 - d. The total VOC emissions from all coatings employed, in pounds or tons.

D. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Central District Office) in writing of any monthly record showing the use of noncomplying coatings (the applicable VOC content limitations in Section A.1). The

notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Central District Office) within 30 days following the end of the calendar month.

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

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:
 40% VOC by volume of the coating and ink, excluding water; or 25% 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, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

Emission Limitation:
 9.05 lbs of VOC/hr

Applicable Compliance Method:
 Compliance with this emission limitation shall be determined by multiplying the emissions unit's maximum hourly coating usage rate (5.65 gallons/hr) by the maximum allowable VOC content for any coating or ink (1.6 lbs/gallon).

Emission Limitation:
 39.6 tons of VOC/yr

Applicable Compliance Method:
 Compliance with this emission limitation shall be determined by summing the monthly values from Section C.1.d and dividing by 2,000 lbs/ton, if necessary.

2. Compliance with the VOC content restrictions specified in Section B shall also be determined in accordance with USEPA Methods 24 and 24A, as appropriate. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator 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

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Facility ID: 0125040942 Emissions Unit ID: K003 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> |
|---|--------------------------------------|--|
| Packer flexographic printing press | OAC rule 3745-21-09(Y)(1)(a) | The volatile organic compound (VOC) content of the coatings and inks employed in this emissions unit shall not exceed 40% VOC by volume of the coating and ink, excluding water; or 25% VOC by volume of the volatile matter in the coating and ink. |
| | OAC rule 3745-31-05 | VOC emissions shall not exceed 9.05 lbs/hr** and |

(PTI # 01-6898)

39.6 tons/yr.

The VOC content of the cleanup material(s) employed in this emissions unit shall not exceed 0%.

The maximum VOC content of each coating and ink employed in this emissions unit shall not exceed 1.6 lbs/gallon (excluding water and exempt solvents), as applied.

2. Additional Terms and Conditions

- (a) ** - The 9.05 lbs of VOC/hr emission limitation reflects the emissions unit's maximum hourly emission rate (maximum hourly coating usage rate times the maximum allowable VOC coating content), and, therefore, there are no record keeping or reporting requirements associated with this emission limitation.

Because each coating and ink employed in this emissions unit can comply with the specified VOC content limitations, as applied, the records normally required to determine the daily volume-weighted average of all coating materials employed are not necessary.

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 the line:
- The name and identification number of each coating, as applied.
 - Amount of each coating employed, in gallons.
 - The VOC content of each coating, as applied, in lbs/gallon (excluding water and exempt solvents) and either percent by volume of the coating and ink (excluding water), or percent by volume of the volatile matter in the coating and ink.
 - The total VOC emissions from all coatings employed, in pounds or tons.

D. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Central District Office) in writing of any monthly record showing the use of noncomplying coatings (the applicable VOC content limitations in Section A.1). The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Central District Office) within 30 days following the end of the calendar month.
2. The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

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:
40% VOC by volume of the coating and ink, excluding water; or 25% 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, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

Emission Limitation:

9.05 lbs of VOC/hr

Applicable Compliance Method:

Compliance with this emission limitation shall be determined by multiplying the emissions unit's maximum hourly coating usage rate (5.65 gallons/hr) by the maximum allowable VOC content for any coating or ink (1.6 lbs/gallon).

Emission Limitation:

39.6 tons of VOC/yr

Applicable Compliance Method:

Compliance with this emission limitation shall be determined by summing the monthly values from Section C.1.d and dividing by 2,000 lbs/ton, if necessary.

2. Compliance with the VOC content restrictions specified in Section B shall also be determined in accordance with USEPA Methods 24 and 24A, as appropriate. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator 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