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Facility Name: **Standard Register Company**

Application Number: **14-4697**

Date: **May 12, 1999**

GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES

The proposed source(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of Ohio Administrative Code (OAC) Rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as

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an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

PUBLIC DISCLOSURE

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC Rule 3745-49-03.

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

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BEST AVAILABLE TECHNOLOGY

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws and regulations.

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Standard Register** located in **Butler** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
K020	18" wide 5 color flexographic press with hot melt adhesive applicator C-15	BAT is satisfied by usage, VOC content and emissions limitations and compliance with Air Toxics Policy	3745-15-07 3745-31-05 3745-21-09 (Y) (1) (a) 40 CFR Part 60 Subpart RR	See General Terms See Additional Special Terms and Conditions A.1., A.3., B.1. thru B.8 9.6 pounds VOC/day 1.75 TPY VOC See Additional Special Term and Condition A.2 Exempt from emissions limits

SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

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Pollutant

Tons/Year

Organic Compound

1.75

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NSPS REQUIREMENTS

The following sources are subject to the applicable provisions of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60.

<u>Source Number</u>	<u>Source Description</u>	<u>NSPS Regulation (Subpart)</u>
K020	5 color flexographic press with adhesive appl. C-15	RR

The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:

- a. construction date (no later than 30 days after such date);
- b. anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
- c. actual start-up date (within 15 days after such date); and
- d. date of performance testing (If required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency
DAPC - Permit Management Unit
P.O. Box 163669
Columbus, OH 43216-3669

and **Hamilton County Dept. of Env. Services**
250 William Howard Taft Road
Cincinnati, OH 45219-2660.

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Hamilton County Dept. of Env. Services, 250 William Howard Taft Road, Cincinnati, OH**

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WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Hamilton County Dept. of Env. Services, 250 William Howard Taft Road, Cincinnati, OH 45219-2660.**

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

CONSTRUCTION COMPLIANCE CERTIFICATION

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to

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startup of the source.

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ADDITIONAL SPECIAL TERMS AND CONDITIONS

A. Applicable Emission Limitations and/or Control Requirements

1. The combined volatile organic compound (VOC) emissions from emissions units K002, K003, K005, K006, K007, K010, K012, K013, K014, K015, K016, K017, K018, K019 and K020 shall not exceed 19.4 tons per year as a rolling, 12-month summation.
2. The VOC content of each coating and each ink employed in emissions units K002, K003, K005, K006, K007, K010, K012, K013, K014, K015, K016, K017, K018, K019 and K020 shall not exceed the following:
 - a. forty per cent VOC by volume of the coating and inks, excluding water; or,
 - b. twenty-five per cent VOC by volume of the volatile matter in the coating and ink.
3. The following VOC content limitations shall apply to all materials employed in emissions units K002, K003, K005, K006, K007, K010, K012, K013, K014, K015, K016, K017, K018, K019 and K020:
 - a. the VOC content of each ink shall not exceed 0.5 pound per gallon;
 - b. the VOC content of each coating shall not exceed 0.5 pound per gallon;
 - c. the VOC content of each water based thinner shall not exceed 0.5 pound per gallon;
 - d. the VOC content of each solvent based thinner shall not exceed 8.5 pounds per gallon;
 - e. the VOC content of each water based adhesive, employed in emissions unit K006 and K016, shall not exceed 0.25 pound per gallon;
 - f. the VOC content from the hot melt adhesive, employed in emissions unit K012, K018, K019 and K020 shall not exceed 0.6 pound per gallon; and,

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- g. the VOC content of each liquid organic cleanup material shall not exceed 6.5 pounds per gallon.

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B. Operational Restrictions

1. The total annual ink usage in emissions units K002, K003, K005, K006, K007, K010, K012, K013, K014, K015, K016, K017, K018, K019 and K020 combined shall not exceed 13,140 gallons per year based upon a rolling, 12-month summation of the ink usage figures.
2. The total annual coating usage in emissions units K002, K003, K005, K006, K007, K010, K012, K013, K014, K015, K016, K017, K018, K019 and K020 combined shall not exceed 8,510 gallons per year based upon a rolling, 12-month summation of the coating usage figures.
3. The total annual water based thinner usage in emissions units K002, K003, K005, K006, K007, K010, K012, K013, K014, K015, K016, K017, K018, K019 and K020 combined shall not exceed 968 gallons per year based upon a rolling, 12-month summation of the water based thinner usage figures.
4. The total annual solvent based thinner usage in emissions units K002, K003, K005, K006, K007, K010, K012, K013, K014, K015, K016, K017, K018, K019 and K020 combined shall not exceed 748 gallons per year based upon a rolling, 12-month summation of the solvent based thinner usage figures.
5. The total annual liquid organic cleanup material usage in emissions units K002, K003, K005, K006, K007, K010, K012, K013, K014, K015, K016, K017, K018, K019 and K020 combined shall not exceed 262 gallons per year based upon a rolling, 12-month summation of the liquid organic cleanup material usage figures.
6. The total annual water based adhesive usage in emissions units K006 and K016 combined shall not exceed 4,672 gallons per year based upon a rolling, 12-month summation of the water based adhesive figures.
7. The total annual hot melt adhesive usage in emissions units K012, K018, K019 and K020 combined shall not exceed 30,479 gallons per year based upon a rolling, 12-month summation of the hot melt adhesive usage figures.

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8. The permittee shall not employ pressure sensitive adhesive in emissions units K002, K003, K005, K006, K007, K010, K013, K014, K015, K016 and K017.

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C. Monitoring and Recordkeeping Requirements

1. The permittee shall maintain the following monthly records for emissions units K002, K003, K005, K006, K007, K010, K012, K013, K014, K015, K016, K017, K018, K019 and K020, combined:
 - a. the company identification for each ink, coating, water based thinner, solvent based thinner, water based adhesive, hot melt adhesive and organic cleanup material employed;
 - b. the number of gallons of each ink, coating, water based thinner, solvent based thinner, water based adhesive, hot melt adhesive and organic cleanup material employed;
 - c. the VOC content of each ink, coating, water based thinner, solvent based thinner, water based adhesive, hot melt adhesive and organic cleanup material employed, in pounds per gallon;
 - d. the VOC content of each ink and coating in per cent VOC by volume of the coating or inks, excluding water;
 - e. the VOC content of each ink and coating in per cent VOC by volume of the volatile matter in the coating or ink;
 - f. the total VOC emission rate for all inks, coatings, water based thinners, solvent based thinners, water based adhesives, hot melt adhesives and organic cleanup materials employed, in pounds or tons per month (calculated by taking the sum of [b] times [c] for each ink, coating, water based thinner, solvent based thinner, water based adhesive, hot melt adhesive and organic cleanup material employed);
 - g. the rolling, 12-month total usage for inks, coatings, water based thinners, solvent based thinners, water based adhesives, hot melt adhesives and organic cleanup materials employed, calculated by adding the current month's usage to the usage for the preceding eleven calendar months for each ink, coating, water based thinner, solvent based thinner, water based adhesive, hot melt adhesive and organic cleanup material employed; and,

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- h. the rolling, 12-month summation of the VOC emissions, in tons per year, calculated by adding the current month's VOC emissions to the VOC emissions for the preceding eleven calendar months.
2. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
 - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and,
 - b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.
3. Each record of any monitoring data, testing data and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation and copies of all reports required by this permit. Such records may be maintained in computerized form.

D. Reporting Requirements

1. The permittee shall notify the Department of Environmental Service in writing of any monthly record showing an exceedance of the rolling, 12-month VOC emission limit, the VOC content limits, and/or the usage limits. The notification shall include a copy of each such record and shall be sent to the Director (the Hamilton County Dept. of Env. Services) within 30 days following the end of the calendar month.
2. The permittee shall also submit annual reports which summarize the rolling, 12-month VOC emission total and material usages in emissions units K002, K003, K005, K006, K007, K010, K012, K013, K014, K015, K016, K017, K018, K019 and K020, combined: for each calendar

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month during the previous calendar year. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

3. The permittee shall submit required reports in the following manner:
 - a. reports of any required monitoring and/or recordkeeping information shall be submitted to the Hamilton County Dept. of Env. Services; and,
 - b. except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Hamilton County Dept. of Env. Services. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly i.e., by January 30, April 30, July 30, and October 30 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06).

E. Compliance Methods/Testing Requirements

1. USEPA Methods 24 and 24A shall be used to determine the VOC contents for the coatings and cleanup materials employed in this emissions unit. 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

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provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

2. Compliance with the VOC emission limit, the VOC content limits, and the usage limits shall be determined by the recordkeeping in C.1.

F. Miscellaneous Requirements

1. The terms and conditions in this permit to install shall modify the air pollution control requirements for the emissions units K002, K003, K005, K006, K007, K010, K012,

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K013, K014, K015, K016, K017, K018 and K019 contained in permit to install 14-4623 issued on October 28, 1998.

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

Pollutant: Petroleum Distillates
TLV (ug/m3): 1,370,000
Maximum Hourly Emission Rate (lbs/hr): 6.3
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 1,306
MAGLC (ug/m3): 32,619

OAC Chapter 3745-31 requires permittee to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in

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the above table;

- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of

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this permit], reduced exhaust gas flow rate, and decreased stack height);

- c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and,
- d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

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

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

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

- 3. The daily emission limitations are based upon the emissions unit's potential to emit. Therefore, no daily records are required to demonstrate compliance with the daily limits.