



State of Ohio Environmental Protection Agency

STREET ADDRESS:

Lazarus Government Center  
50 W. Town St., Suite 700  
Columbus, Ohio 43215

TELE: (614) 644-3020 FAX: (614) 644-3184  
www.epa.state.oh.us

MAILING ADDRESS:

P.O. Box 1049  
Columbus, OH 43216-1049

4/6/2009

James Phillips  
The Ohio Art Company  
One Toy Street  
Bryan, OH 43506

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE  
Facility ID: 0386010161  
Permit Number: P0104189  
Permit Type: OAC Chapter 3745-31 Modification  
County: Williams

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR
No	CEMS
No	MACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, The Bryan Times. A copy of the public notice and the draft permit are enclosed. This permit has been posted to the Division of Air Pollution Control Web page <http://www.epa.state.oh.us/dapc> in Microsoft Word and Adobe Acrobat format. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall  
Permit Review/Development Section  
Ohio EPA, DAPC  
122 South Front Street  
Columbus, Ohio 43215

and Ohio EPA DAPC, Northwest District Office  
347 North Dunbridge Road  
Bowling Green, OH 43402

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install and operate will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install and Operate is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461.

Sincerely,

Michael W. Ahern, Manager  
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 *Via E-Mail Notification*  
Ohio EPA-NWDO; Michigan; Indiana

Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Chris Korleski, Director





## Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

The Ohio Art Company is not currently a Title V facility. The permittee has requested a modification to PTI 03-13026, issued on May 13, 2003 to allow for change in permit allowables. On December 13, 2005 a Permit to Operate was issued for emissions unit K010 establishing federally enforceable emission limitations for purposes of avoiding applicability of Title V and Maximum Achievable Control Technology (MACT) regulations. The permittee was restricted to 4.5 tons OC/rolling, 12-month period from coating and printing operations based on coating and printing content and usage restrictions. The modification will not result in a change to the 4.5 tons OC/rolling, 12-month period, but the permittee has requested an increase in coating content from 0.30 lb/gallon to 0.74 lb/gallon.

3. Facility Emissions and Attainment Status:

The Ohio Art Company is not currently considered to be a "Major" source for Title V purposes. Williams County is designated attainment for all criteria pollutants.

4. Source Emissions:

The Ohio Art Company has requested to maintain the federally enforceable emission limitations established in a Permit to Operate issued on December 13, 2005. Those limitations include the following:

4.5 tons OC/rolling, 12-month period from coating and printing operations

7.5 tons OC/rolling, 12-month period from cleanup operations for emissions units K001 through K005, K007, K010, and K011 combined.

9.9 tons per rolling, 12-month period for and individual Hazardous Air Pollutant (HAP) and 24.9 tons per rolling, 12-month period for any combination of HAPs for emissions units K001 through K005, K007, K010, and K011 combined.

5. Conclusion:

The federally enforceable restrictions established in the Permit to Operate issued on December 13, 2005 will be maintained with the issuance of this permit and will continue to limit VOC and HAP emissions below "Major" source thresholds for Title V and MACT purposes.

6. Please provide additional notes or comments as necessary:

None

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	12

PUBLIC NOTICE  
Issuance of Draft Air Pollution Permit-To-Install and Operate  
The Ohio Art Company

Issue Date: 4/6/2009

Permit Number: P0104189

Permit Type: OAC Chapter 3745-31 Modification

Permit Description: Modification to PTI 03-13026, issued on May 13, 2003 to allow for change in permit allowables.

Facility ID: 0386010161

Facility Location: The Ohio Art Company  
One Toy Street,  
Bryan, OH 43506

Facility Description: Commercial Lithographic Printing

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio has issued a draft action of an air pollution control, federally enforceable permit-to-install and operate (PTIO) for the facility at the location identified above on the date indicated. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Donald Waltermeyer at Ohio EPA DAPC, Northwest District Office, 347 North Dunbridge Road or (419)352-8461. The permit can be downloaded from the Web page: [www.epa.state.oh.us/dapc](http://www.epa.state.oh.us/dapc)





**State of Ohio Environmental Protection Agency  
Division of Air Pollution Control**

**DRAFT**

**Air Pollution Permit-to-Install and Operate  
for  
The Ohio Art Company**

Facility ID: 0386010161  
Permit Number: P0104189  
Permit Type: OAC Chapter 3745-31 Modification  
Issued: 4/6/2009  
Effective: To be entered upon final issuance  
Expiration: To be entered upon final issuance





State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Air Pollution Permit-to-Install and Operate**  
for  
The Ohio Art Company

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State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install and Operate**

**Permit Number:** P0104189

**Facility ID:** 0386010161

**Effective Date:** To be entered upon final issuance

# Authorization

Facility ID: 0386010161  
Application Number(s): A0036381  
Permit Number: P0104189  
Permit Description: Modification to PTI 03-13026, issued on May 13, 2003 to allow for change in permit allowables.  
Permit Type: OAC Chapter 3745-31 Modification  
Permit Fee: \$200.00 *DO NOT send payment at this time - subject to change before final issuance*  
Issue Date: 4/6/2009  
Effective Date: To be entered upon final issuance  
Expiration Date: To be entered upon final issuance  
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

The Ohio Art Company  
One Toy Street  
Bryan, OH 43506

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northwest District Office  
347 North Dunbridge Road  
Bowling Green, OH 43402  
(419)352-8461

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski  
Director



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install and Operate**

**Permit Number:** P0104189

**Facility ID:** 0386010161

**Effective Date:** To be entered upon final issuance

## Authorization (continued)

Permit Number: P0104189

Permit Description: Modification to PTI 03-13026, issued on May 13, 2003 to allow for change in permit allowables.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

<b>Emissions Unit ID:</b>	<b>K010</b>
Company Equipment ID:	UV#1 4ClrCoat/Press
Superseded Permit Number:	03-13026
General Permit Category and Type:	Not Applicable



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install and Operate**

**Permit Number:** P0104189

**Facility ID:** 0386010161

**Effective Date:** To be entered upon final issuance

## **A. Standard Terms and Conditions**



**1. What does this permit-to-install and operate ("PTIO") allow me to do?**

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

**2. Who is responsible for complying with this permit?**

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

**3. What records must I keep under this permit?**

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

**4. What are my permit fees and when do I pay them?**

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

**5. When does my PTIO expire, and when do I need to submit my renewal application?**

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is



very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

**6. What happens to this permit if my project is delayed or I do not install or modify my source?**

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

**7. What reports must I submit under this permit?**

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

**8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?**

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

**9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?**

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.



**10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?**

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Northwest District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

**11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?**

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

**12. What happens if one or more emissions units operated under this permit is/are shut down permanently?**

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

**13. Can I transfer this permit to a new owner or operator?**

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install and Operate**

**Permit Number:** P0104189

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**Effective Date:** To be entered upon final issuance

change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

**14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?**

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

**15. What happens if a portion of this permit is determined to be invalid?**

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install and Operate**

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## **B. Facility-Wide Terms and Conditions**



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install and Operate**

**Permit Number:** P0104189

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**Effective Date:** To be entered upon final issuance

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



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install and Operate**

**Permit Number:** P0104189

**Facility ID:** 0386010161

**Effective Date:** To be entered upon final issuance

## **C. Emissions Unit Terms and Conditions**



**1. K010, UV#1 4ClrCoat/Press**

**Operations, Property and/or Equipment Description:**

4 color lithographic press with trailing (UV) coater. Modification to PTI 03-13026, issued on May 13, 2003 to allow for change in permit allowables.

a) 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. g)(1)

(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. b)(1)b., b)(2)b.i through b)(2)b.iii., c)(1) through c)(4), d)(1), d)(3) through d)(6), e)(1), f)(1)b and f)(1)c. through f)(1)l.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05 (A) (3)(a)	0.74 pound of volatile organic compound (VOC) per gallon of coating, excluding water and exempt solvents  7.71 lbs organic compound (OC)/hr from coating and printing operations (See b)(2)a.)  1035 lbs OC/month & 6.21 tons OC/yr from cleanup operations
b.	OAC rule 3745-31-05 (D)	4.5 tons OC/rolling, 12-month period from coating and printing operations (See b)(2)b.i.)  7.5 tons OC/rolling, 12-month period from cleanup operations for emissions units K001 through K005, K007, K010, and K011, combined (See b)(2)b.ii.)



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		9.9 tons per rolling, 12-month period for any individual Hazardous air Pollutant (HAP) and 24.9 tons per rolling, 12-month period for any combination of HAPs for emissions unit K001 through K005, K007, K010, and K011 combined (See b)(2)b.iii.)
c.	OAC rule 3745-21-09 (U)(1) (i)	See b)(2)c.
d.	ORC 3704.03(F)(4)(b) OAC rule 3745-114-01	See g)(1)

(2) Additional Terms and Conditions

- a. The emission limitation of 7.71 lbs OC/hr was established to reflect the potential to emit for this emissions unit. Therefore, no record keeping, deviation reporting or compliance method calculations are required to demonstrate compliance with this limitation.
- b. The permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Title V and Maximum Achievable Control Technology (MACT) regulations:
  - i. 4.5 tons OC/rolling, 12-month period from coating and printing operations based on coating and printing content and usage restrictions [see c)(1)]. For purposes of federal enforceability, emission limitations on OC effectively restrict volatile organic compound (VOC) emissions.  
  
A federally enforceable limitation of 4.50 tons OC per rolling, 12-month period was initially established in a permit issued on December 13, 2006 and as such the facility has existing records of OC emissions in lieu of establishing monthly OC emissions restrictions for the first year of operation.
  - ii. 7.5 tons OC/rolling, 12-month period from cleanup operations for emissions units K001 through K005, K007, K010, and K011 combined [See c)(2), c)(3) & c)(4)].  
  
A federally enforceable limitation of 7.5 tons OC per rolling, 12-month period was initially established in a permit issued on December 13, 2006 and as such the facility has existing records of OC emissions in lieu of establishing monthly OC emissions restrictions for the first year of operation.
  - iii. 9.90 tons per rolling, 12-month period for any individual HAP and 24.9 tons per rolling, 12-month period for any combination of HAPs for emissions units K001 through K005, K007, K010, and K011 combined.



Federally enforceable limitations of 9.9 tons of any individual HAP and 24.9 tons of any combination of HAPs per rolling, 12-month period were initially established in a permit issued on December 13, 2006 and as such the facility has existing records of HAP emissions in lieu of establishing monthly OC emissions restrictions for the first year of operation.

- c. The emission limitation established by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A) (3) (a).

c) Operational Restrictions

- (1) The maximum annual coating and ink usage for this emissions unit shall not exceed any of the following
  - a. 16,500 gallons of coating with a maximum OC content of 0.74 lb/gallon.
  - b. 100,000 lbs of ink with a maximum OC content of 0.04 lb OC/lb ink.
- (2) The maximum annual cleanup material usage for emissions units K001 through K005, K007, K010, and K011, combined, shall not exceed 22,500 gallons per rolling, 12-month period.
- (3) The OC content of any cleanup material employed in this emissions unit shall not exceed 9.5 lbs/gallon.
- (4) Cleanup materials employed in emissions units K001 through K005, K007, K010, and K011 shall be reclaimed/recovered at a minimum rate of 93 percent, by volume.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for all coatings and inks employed in this emissions unit:
  - a. the name and identification number of each coating/ink employed, as applied;
  - b. the number of gallons of each coating employed;
  - c. the VOC content of each coating (excluding water and exempt solvents), in lbs/gallon as applied [the VOC content shall be calculated in accordance with the equation specified in paragraph (B) (8) of OAC rule 3745-21-10 for CVOC<sub>2</sub>];
  - d. the pounds of each ink employed;
  - e. the OC content of each coating employed, as applied, in lbs/gallon;
  - f. the OC content of each ink employed, in lbs OC/lb ink;
  - g. the annual OC emissions, in tons from all coatings/inks, based upon a rolling, 12-month summation [d)(1) b. times d)(1)e. plus d)(1)d times d)(1)f. times 1 ton/2000 lbs]; and





- a. the date recovered materials were first added to the recovery tank/drum and the date the materials from the recovery tank/drum were shipped offsite;
  - b. the total amount of material collected and shipped from recycle/recover and/or disposal at an outside facility, in gallons, on the day it is shipped;
  - c. a record of the OC content of each cleanup solvent material that is collected for recovery, in pounds per gallon, or a record of the testing results of the VOC content of the material shipped;
  - d. the mass (lbs) of OC from each shipment of recovered material, calculated by multiplying the lowest OC content of any cleanup solvent material recovered as recorded in d)(5)c. above and the total amount of material collected and shipped offsite as recorded in d)(5)b. above. The higher OC content may be used for each shipment provided it be maintained by the permittee; and
  - e. the permittee shall calculate the recover/reclaim rate (in percent) for all cleanup materials shipped offsite by dividing the mass (lbs) of OC calculated in d)(5)d. above by the mass (lbs) of OC applied for cleanup during the time period recorded in d)(5)a. above and multiplying by 100. The mass (lbs) of OC applied for cleanup shall be calculated by adding the daily VOC mass usage values recorded in d)(3)d. for the time period record in d)(5)a.
- (6) The permittee shall collect and record the following information regarding HAP emissions each month for emissions units K001 through K005, K007, K010, and K011 combined:
- a. the company identification of each coating, thinner, ink and cleanup material employed;
  - b. the pounds per gallon of each HAP in each coating, thinner, ink, and cleanup material employed;
  - c. the number of gallons of each coating, thinner, ink, and cleanup material employed;
  - d. the total emissions rate for each HAP from all coatings, thinners, inks, and cleanup materials employed (summation of each HAP emissions rate [d)(6)b. times d)(6)c. for each individual coating, thinner, ink, and cleanup material\*], in lbs/month
- \*calculations for HAP emissions from cleanup operations can take into account the minimum recovery rate of 93%
- e. the total HAP rate for the combination of all HAPs from all coatings, thinners, inks, and cleanup materials employed (summation of d)(6)d. for all HAPs), in lbs/month; and
  - f. the annual emissions of each individual HAP and all HAPs combined, based upon a rolling, 12-month summation of monthly HAP emissions.



e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify:

- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the Potential to Emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
  - i. 4.5 tons OC per rolling, 12-month period from coating and printing operations;
  - ii. 9.9 tons individual HAP per rolling, 12-month period for emissions units K001 through K005, K007, K010, and K011 combined;
  - iii. 24.9 tons combined HAPs per rolling, 12-month period for emissions units K001 through K005, K007, K010, and K011 combined;
  - iv. 16, 500 gallons of coating per rolling, 12-month period for emissions unit K010;
  - v. 0.74 lbs OC/gallon of coating employed in emissions unit K010;
  - vi. 100,000 lbs ink per rolling, 12-month period for emissions unit K010;
  - vii. 0.04 lb OC/lb ink employed in emissions unit K010;
  - viii. 22,500 gallons of cleanup material per rolling, 12-month period for emissions units K001 through K005, K007, K010, and K011;
  - ix. 9.5 lbs OC/gallon from cleanup material employed in emissions unit K010;
  - x. 93% recovery/reclaim rate for cleanup materials employed in emissions units K001 through K005, K007, K010, and K011; and
  - xi. 7.5 tons OC per rolling, 12-month period from cleanup operations.
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted (postmarked) each year by the thirty-first of January (covering October to December), the thirtieth of April (covering January to March), the thirty-first of July (covering April to June), and the thirty-first of October



(covering July to September), unless an alternative schedule has been established and approved by the director (the appropriate district office or local air agency).

- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the emission limitations in section b)(1) of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation:  
7.71 lbs OC/hr from coating operations

Applicable Compliance Method:

The hourly emission limitation represents the potential to emit\* of the emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

\*The potential to emit is based on the following:

the maximum hourly coating usage rate (6.8 gal/hr) x the maximum coating OC content (0.74 lb/gallon coating) + the maximum hourly ink usage rate (67 lbs/hr) x the maximum ink OC content (0.04 lb OC/lb ink)

- b. Emission Limitation:  
0.74 pound VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section d)(1) of this permit.

- c. Emission Limitation:  
1035 lbs OC/month & 6.21 tons OC/yr from cleanup operations

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section d)(2) of this permit.

- d. Emission Limitation:  
4.5 tons OC/rolling, 12-month period from coating and printing operations

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section d)(1) of this permit.



- e. Emission Limitation:  
7.5 tons OC/rolling, 12-month period from cleanup operations for emissions units K001 through K005, K007, K010, and K011 combined  
  
Applicable Compliance Method:  
Compliance shall be based upon the record keeping requirements specified in section d)(4) of this permit.
- f. Emission Limitation:  
9.9 tons per rolling, 12-month period for any individual HAP and 24.9 tons per rolling, 12-month period for any combination of HAPs for emission units K001 through K005, K007, K010, and K011 combined  
  
Applicable Compliance Method:  
Compliance shall be based upon the record keeping requirements specified in section d)(6) of this permit.
- g. Emission Limitation:  
  
The maximum annual coating usage for emissions unit K010 shall not exceed 16,500 gallons per year, based on a rolling, 12-month summation of coating usage.  
  
Applicable Compliance Method:  
Compliance shall be based upon the record keeping requirements specified in section d)(1) of this permit.
- h. Emission Limitation:  
The maximum annual ink usage for emissions unit K010 shall not exceed 100,000 lbs per year, based on a rolling, 12-month summation of ink usage.  
  
Applicable Compliance Method:  
Compliance shall be based upon the record keeping requirements specified in section d)(1) of this permit.
- i. Emission Limitation:  
The OC content for all inks employed in this emissions unit shall not exceed 0.04 lbs OC/lb ink.  
  
Applicable Compliance Method:  
Compliance shall be based upon the record keeping requirements specified in section d)(1) of this permit.
- j. Emission Limitation:  
The maximum annual cleanup usage for emissions unit K001 through K005, K007, K010, and K011 combined shall not exceed 22,500 gallons per year, based on a rolling, 12-month summation of the cleanup usage  
  
Applicable Compliance Method:  
Compliance shall be based upon the record keeping requirements specified in section d)(4) of this permit.



- k. Emission Limitation:  
The OC content for all cleanup materials employed in this emissions unit shall not exceed 9.5 lbs OC/gallon.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section d)(2) of this permit.

- l. Emission Limitation:  
Cleanup materials employed in emissions units K001 through K005, K007, K010, and K011 shall be reclaimed/recovered at a minimum rate of 93 percent, by volume.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section d)(5) of this permit.

- (2) Formulation data or USEPA Method 24 shall be used to determine the VOC/OC contents of the coatings and cleanup materials.

g) Miscellaneous Requirements

- (1) Modeling to demonstrate compliance with, the AToxic Air Contaminant Statute<sup>e</sup>, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit=s maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.