



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

7/21/2009

Brent Peterson
Bluegrass Labels Co., LLC, DI-NA-CAL Label Group
4500 Beech Street
Cincinnati, OH 45212-1049

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1431370116
Permit Number: P0105021
Permit Type: Renewal
County: Hamilton

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR
No	CEMS
Yes	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 Cincinnati Enquirer. 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 Hamilton County Dept. of Environmental Services
250 William Howard Taft Pkwy.
Cincinnati, OH 45219-2660

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 Hamilton County Dept. of Environmental Services at (513)946-7777.

Sincerely,

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

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
HCDOES; Indiana; Kentucky

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:

Bluegrass Labels Co., LLC, Di-Na-Cal Label Group (Di-Na-Cal) is a packaging rotogravure printing operation located in the City of Norwood, Hamilton County, Ohio. The facility operates three rotogravure printing presses which use solvent based inks containing hazardous air pollutants (HAP). Volatile organic compound (VOC) and HAP emissions are controlled by total enclosures and are vented to a common regenerative thermal oxidizer having a control efficiency of at least 95% destruction efficiency.

Di-Na-Cal has been operated with a Title V operating permit since 5/30/03. Di-Na-Cal's major status has been due to potential VOC emissions and HAP usage, making the facility subject to 40 CFR 63, Subpart KK.

Current operations no longer have potential VOC emissions greater than major source emission threshold levels subjecting them to Title V and 40 CFR 63, Subpart KK requirements. The facility proposes to limit VOC and HAP potential emissions with a Federally Enforceable Permit to Install/Operate (FEPTIO) to avoid Title V operating permit requirements and become an area source for 40 CFR 63 Subpart KK thereby not being subject to some of the requirements listed 40 CFR 63, Subpart KK.

40 CFR 63, Subpart KK is unusual in allowing an affected facility to change its status from major to area source thereby allowing the above.

3. Facility Emissions and Attainment Status:

Actual emissions of VOC from Di-Na-Cal have not exceeded 20 tons per year (TPY) since 2005. Current allowable VOC emissions for the rotogravure printing presses are 159 TPY.

Hamilton County is a non-attainment area for ozone and fine particulate matter (PM_{2.5}) and attainment for the rest of the criteria pollutants.

4. Source Emissions:

Proposed allowable emissions of VOC are 78.02 TPY. Limitations on coating usage and clean up solvents will be required. HAP usage is limited for area sources subject to CFR 63, Subpart KK. Facility-wide recordkeeping requirements are required to demonstrate compliance.

5. Conclusion:

Approval of a FEPTIO for DI-Na-Cal including the proposed HAP, coating and clean-up solvent limitations, combined with the total enclosures and 95% destruction efficiency thermal oxidizer is recommended. No degradation of air quality will occur, and allowable emissions are actually reduced from the current total facility-wide emission limitations.

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

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>
VOC	78.02

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install and Operate
Bluegrass Labels Co., LLC, DI-NA-CAL Label Group

Issue Date: 7/21/2009

Permit Number: P0105021

Permit Type: Renewal

Permit Description: Permittee is currently TV. This FEPTIO is so that the permittee can opt out of Title V operating permit requirements and 40 CFR 63 Subpart KK major source applicability.

Facility ID: 1431370116

Facility Location: Bluegrass Labels Co., LLC, DI-NA-CAL Label Group
4500 Beech Street,
Cincinnati / Norwood, OH 45212-1049

Facility Description: Commercial Gravure 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 Mike Kramer at Hamilton County Dept. of Environmental Services, 250 William Howard Taft Pkwy. or (513)946-7777. The permit can be downloaded from the Web page: 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
Bluegrass Labels Co., LLC, DI-NA-CAL Label Group**

Facility ID: 1431370116
Permit Number: P0105021
Permit Type: Renewal
Issued: 7/21/2009
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
Bluegrass Labels Co., LLC, DI-NA-CAL Label Group

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State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0105021

Facility ID: 1431370116

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 1431370116

Application Number(s): A0037032

Permit Number: P0105021

Permit Description: Permittee is currently TV. This FEPTIO is so that the permittee can opt out of Title V operating permit requirements and 40 CFR 63 Subpart KK major source applicability.

Permit Type: Renewal

Permit Fee: \$0.00 *DO NOT send payment at this time - subject to change before final issuance*

Issue Date: 7/21/2009

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:

Bluegrass Labels Co., LLC, DI-NA-CAL Label Group
4500 Beech Street
Cincinnati / Norwood, OH 45212-1049

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:

Hamilton County Dept. of Environmental Services
250 William Howard Taft Pkwy.
Cincinnati, OH 45219-2660
(513)946-7777

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: P0105021

Facility ID: 1431370116

Effective Date: To be entered upon final issuance

Authorization (continued)

Permit Number: P0105021

Permit Description: Permittee is currently TV. This FEPTIO is so that the permittee can opt out of Title V operating permit requirements and 40 CFR 63 Subpart KK major source applicability.

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

Emissions Unit ID:	K004
Company Equipment ID:	Press #67
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K005
Company Equipment ID:	Press #101
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K006
Company Equipment ID:	Press #102
Superseded Permit Number:	
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: P0105021

Facility ID: 1431370116

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 Hamilton County Dept. of Environmental Services 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 change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0105021

Facility ID: 1431370116

Effective Date: To be entered upon final issuance

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

Permit Number: P0105021

Facility ID: 1431370116

Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



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) 2., 3., 4., 5., 6. and 7.
2. The permittee commits to and meets the criteria to be considered an area source for Hazardous Air Pollutants (HAPs), and is subject to the record keeping and reporting provisions in 40 CFR 63.830(b)(1).
3. Should HAP usage for the facility exceed either:
 - a) 9.1 Mg (10 tons) per each rolling 12-month period of any single HAP at the facility, including materials used for source categories or purposes other than printing or publishing, or
 - b) 22.7 Mg (25 tons) per each rolling 12-month period of any combination HAP at the facility, including materials used for source categories or purposes other than printing or publishing.

Then, the permittee shall be considered in violation of its commitment for that 12-month period and shall be considered a major source a major source of HAP beginning the first month after the end of the 12-month period in which either of the HAP-usage thresholds was exceeded. As a major source of HAP, the facility would be subject to the provisions of 40 CFR 63.820(a)(1) and no longer be eligible for the exemption found in 40 CFR 63.820(a)(2).

4. Within 30 days after a violation of its commitment, the permittee shall submit a report to the Hamilton County Department of Environmental Services that either demonstrates compliance with all of the MACT requirements or provides a plan and schedule for achieving compliance with all of the MACT requirements.
5. The permittee shall collect and record the following information each month for all materials containing any hazardous air pollutant (HAP)¹ that are used at the entire facility:
 - a) the name and identification number/code of each coating, thinner, additive, cleanup material, and any other material containing any HAP;
 - b) the name/identification and the weight fraction of each individual HAP contained in each material applied (and identified in Aa@ above) i.e., pound of each individual HAP per pound of each HAP-containing material;
 - c) the number of gallons of each coating, thinner, additive, cleanup material, and other material applied during the month;
 - d) the density of each coating, thinner, additive, cleanup material, and other material employed, in pound(s) per gallon;



- e) for each individual HAP, the total emissions from all the materials employed, in ton(s), i.e., for each individual HAP, the summation of the products of A_b times A_c times A_d for all the materials applied during the month, divided by 2,000 pounds;
- f) the total combined HAPs emissions from all the materials employed during the month, in ton(s), i.e., the summation of all the individual HAPs emissions from A_e above;
- g) for each individual HAP, the total emissions during the rolling, 12-month period, i.e., the summation of the individual HAP emissions, as recorded in A_e above, for the present month plus the previous 11 months of operation, in ton(s); and
- h) the total combined HAP emissions during the rolling 12-month period, i.e., the summation of all HAP emissions, as recorded in A_f above, for the present month plus the previous 11 months of operation, in ton(s).

¹ A listing of the HAPs can be found in Section 112(b) of the Clean Air Act, or can be obtained by contacting your Ohio EPA District Office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings and cleanup materials.

- 6. 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:
 - (1) all exceedances of the rolling, 12-month single HAP usage limitation,
 - (2) all exceedances of the rolling, 12-month combination HAP usage limitation,
 - 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, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

7. Material Usage Restrictions:

The maximum HAP usage for emissions units K004, K005, and K006 combined, shall not exceed 9.1 Mg (10 tons) per each rolling 12-month period of any single HAP at the facility, including materials used for source categories or purposes other than printing or publishing, or 22.7 Mg (25 tons) per each rolling 12-month period of any combination HAP at the facility, including materials used for source categories or purposes other than printing or publishing.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0105021

Facility ID: 1431370116

Effective Date: To be entered upon final issuance

Applicable Compliance Method:

Compliance with the material usage restrictions in B.3. shall be determined by the record keeping requirements specified in B.5.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0105021

Facility ID: 1431370116

Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. K004, Press #67

Operations, Property and/or Equipment Description:

8 Station Rotogravure Printing Press; Co. ID Rotogravure Press No. 67

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. 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. b)(1)b., c)(2), c)(3), d)(2) and e)(2).

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)	Use of a total enclosure and oxidizer capable of maintaining an overall control efficiency of at least 95% by weight for VOC. See b)(2)b. Compliance with OAC rule 3745-31-05(A)(3) also includes compliance with OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(D)	Emissions of Volatile Organic Compounds (VOC) from emissions units K004, K005, and K006 combined, shall not exceed 78.02 tons based on a rolling, 12-month summation. See c)(2) and c)(3).
c.	OAC rule 3745-21-09(Y)(1)(b)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	40 CFR, Part 63, Subpart KK.	See section B.2.

(2) Additional Terms and Conditions

- a. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of a total enclosure and oxidizer to control emissions and compliance with 40 CFR, Part 63, Subpart KK.
- b. All of the VOC emissions from this emissions unit shall be vented to a thermal oxidizer that shall meet the operational, monitoring, and record keeping requirements of this permit, when the emissions unit is in operation.

c) Operational Restrictions

- (1) The average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit is in operation, shall not be less 1500 degrees Fahrenheit or shall not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance.
- (2) The maximum annual coating usage for emissions units K004, K005, and K006 combined, shall not exceed 4,500,000 lbs., based upon a rolling, 12-month summation of the coating usage figures.
- (3) The maximum annual clean-up solvent usage for emissions units K004, K005, and K006 combined, shall not exceed 135,000 lbs., based upon a rolling 12-month summation of the clean-up solvent usage figures.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal oxidizer when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within ± 1 percent of the temperature being measured or ± 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:
 - a. all 3-hour blocks of time, when the emissions unit(s) controlled by the thermal oxidizer was/were in operation, during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance; and



- b. a log or record of the operating time for the capture (collection) system, thermal oxidizer, monitoring equipment, and the associated emissions unit(s).

These records shall be maintained at the facility for a period of five years.

- (2) The permittee shall maintain monthly records of the following information for this emissions unit:

- a. The total pounds of each coating, ink and cleanup material employed.
- b. The VOC content, in percent by weight for each coating, ink and cleanup material employed.
- c. The rolling, 12-month summation of total pounds of each coating, ink and cleanup material employed.
- d. The total VOC input, in pounds (the summation of each coating, ink, and cleanup material recorded in (2)a. multiplied by the corresponding VOC content recorded in (2)b).
- e. The rolling, 12-month summation of the total VOC input, in pounds.

e) Reporting Requirements

- (1) The permittee shall submit quarterly summaries of the following records:

- a. all 3-hour blocks of time (when the emissions unit(s) was/were in operation) during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature maintained during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance;
- b. any records of downtime (date and length of time) for the capture (collection) system, the thermal oxidizer, and/or the monitoring equipment when the emissions unit(s) was/were in operation; and
- c. a log of the operating time for the capture system, thermal oxidizer, monitoring equipment, and the emissions unit(s).

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (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) 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:
- b. all exceedances of the rolling, 12-month coating usage limitation,



- c. all exceedances of the rolling, 12-month clean up solvent usage limitation,
- d. the probable cause of each deviation (excursion);
- e. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- f. 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, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (3) 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.

The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the thermal oxidizer during the 12-month reporting period for this/these emissions unit(s):

- a. each period of time (start time and date, and end time and date) when the average combustion temperature within the thermal oxidizer was outside of the acceptable range;
- b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the thermal oxidizer;
- c. each incident of deviation described in Aa@ or "b" (above) where a prompt investigation was not conducted;
- d. each incident of deviation described in Aa@ or "b" where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the temperature within the thermal oxidizer into compliance with the acceptable range, was determined to be necessary and was not taken; and
- e. each incident of deviation described in Aa@ or "b" where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

- f) Testing Requirements



- (1) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted approximately 2.5 years after permit issuance and within 6 months prior to permit renewal,
 - b. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency limitation for emissions units K004-K006.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

Method 25.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's [Guidelines for Determining Capture Efficiency](#), dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
- f. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.



- g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

(2) Emissions Limitation:

Emissions of Volatile Organic Compounds (VOC) from emissions units K004, K005, and K006 combined, shall not exceed 78.02 tons base on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the combined emissions limitation shall be demonstrated by the record keeping requirements specified in d)(2).

(3) Material Usage Restrictions:

The maximum annual coating usage for emissions units K004, K005, and K006 combined, shall not exceed 4,500,000 lbs., based upon a rolling, 12-month summation of the coating usage figures.

The maximum annual clean-up solvent usage for emissions units K004, K005, and K006 combined, shall not exceed 135,000 lbs., based upon a rolling 12-month summation of the clean-up solvent usage figures.

Applicable Compliance Method:

Compliance with the material usage shall be determined by the record keeping requirements specified in d)(2).

- (4) The permittee may determine the volatile matter content of the materials based on formulation data, and may rely on volatile matter content data provided by material suppliers. In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR, Part 60, Appendix A, Test Methods 24 or 24A shall be used unless the permittee can demonstrate to the satisfaction of the Ohio EPA that the formulation data is correct.

g) Miscellaneous Requirements

- (1) None.



2. K005, Press #101

Operations, Property and/or Equipment Description:

10 Station Rotogravure Printing Press; Co. ID Rotogravure Press No. 101

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. 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. b)(1)b., c)(2), c)(3), d)(2) and e)(2).

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)	Use of a total enclosure and oxidizer capable of maintaining an overall control efficiency of at least 95% by weight for VOC. See b)(2)b. Compliance with OAC rule 3745-31-05(A)(3) also includes compliance with OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(D)	See c)(2) and c)(3).
c.	OAC rule 3745-21-09(Y)(1)(b)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	40 CFR, Part 63, Subpart KK.	See section B.2.



- (2) Additional Terms and Conditions
 - a. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of a total enclosure and oxidizer to control emissions and compliance with 40 CFR, Part 63, Subpart KK.
 - b. All of the VOC emissions from this emissions unit shall be vented to the/a thermal oxidizer that shall meet the operational, monitoring, and record keeping requirements of this permit, when the emissions unit is in operation.
- c) Operational Restrictions
 - (1) The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be less 1500 degrees Fahrenheit or shall not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance.
 - (2) The maximum annual coating usage for emissions units K004, K005, and K006 combined, shall not exceed 4,500,000 lbs., based upon a rolling, 12-month summation of the coating usage figures.
 - (3) The maximum annual clean-up solvent usage for emissions units K004, K005, and K006 combined, shall not exceed 135,000 lbs., based upon a rolling 12-month summation of the clean-up solvent usage figures.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal oxidizer when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within ± 1 percent of the temperature being measured or ± 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer=s recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:
 - a. all 3-hour blocks of time, when the emissions unit(s) controlled by the thermal oxidizer was/were in operation, during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance; and
 - b. a log or record of the operating time for the capture (collection) system, thermal oxidizer, monitoring equipment, and the associated emissions unit(s).

These records shall be maintained at the facility for a period of five years.



- (2) The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. The total pounds of each coating, ink and cleanup material employed.
 - b. The VOC content, in percent by weight for each coating, ink and cleanup material employed.
 - c. The rolling, 12-month summation of total pounds of each coating, ink and cleanup material employed.
 - d. The total VOC input, in pounds (the summation of each coating, ink, and cleanup material recorded in (2)a. multiplied by the corresponding VOC content recorded in (2)b.
 - e. The rolling, 12-month summation of the total VOC input, in pounds.
- e) Reporting Requirements
 - (1) The permittee shall submit quarterly summaries of the following records:
 - a. all 3-hour blocks of time (when the emissions unit(s) was/were in operation) during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature maintained during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance;
 - b. any records of downtime (date and length of time) for the capture (collection) system, the thermal oxidizer, and/or the monitoring equipment when the emissions unit(s) was/were in operation; and
 - c. a log of the operating time for the capture system, thermal oxidizer, monitoring equipment, and the emissions unit(s).

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (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) 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:
 - b. all exceedances of the rolling, 12-month coating usage limitation,
 - c. all exceedances of the rolling, 12-month clean up solvent usage limitation,
 - d. the probable cause of each deviation (excursion);



- e. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- f. 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, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (3) 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.

The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the thermal oxidizer during the 12-month reporting period for this/these emissions unit(s):

- a. each period of time (start time and date, and end time and date) when the average combustion temperature within the thermal oxidizer was outside of the acceptable range;
- b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the thermal oxidizer;
- c. each incident of deviation described in Aa@ or "b" (above) where a prompt investigation was not conducted;
- d. each incident of deviation described in Aa@ or "b" where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the temperature within the thermal oxidizer into compliance with the acceptable range, was determined to be necessary and was not taken; and
- e. each incident of deviation described in Aa@ or "b" where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

f) Testing Requirements

- (1) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted approximately 2.5 years after permit issuance and within 6 months prior to permit renewal,



- b. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency limitation for emissions units K004-K006.
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

Method 25.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's [Guidelines for Determining Capture Efficiency](#), dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
- f. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the



submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

(2) Emission Limitation:

Emissions of Volatile Organic Compounds (VOC) from emissions units K004, K005, and K006 combined, shall not exceed 78.02 tons base on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the combined emissions limitation shall be demonstrated by the record keeping requirements specified in d)(2).

(3) Material Usage Restrictions:

The maximum annual coating usage for emissions units K004, K005, and K006 combined, shall not exceed 4,500,000 lbs., based upon a rolling, 12-month summation of the coating usage figures.

The maximum annual clean-up solvent usage for emissions units K004, K005, and K006 combined, shall not exceed 135,000 lbs., based upon a rolling 12-month summation of the clean-up solvent usage figures.

Applicable Compliance Method:

Compliance with the material usage shall be determined by the record keeping requirements specified in d)(2).

(4) The permittee may determine the volatile matter content of the materials based on formulation data, and may rely on volatile matter content data provided by material suppliers. In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR, Part 60, Appendix A, Test Methods 24 or 24A shall be used unless the permittee can demonstrate to the satisfaction of the Ohio EPA that the formulation data is correct.

g) Miscellaneous Requirements

(1) None.



3. K006, Press #102

Operations, Property and/or Equipment Description:

11 station rotogravure printing press with total enclosure and regenerative thermal oxidizer

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. 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. b)(1)b., c)(2), c)(3), d)(2) and e)(2).

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)	Use of a total enclosure and oxidizer capable of maintaining an overall control efficiency of at least 95% by weight for VOC. See b)(2)b. Compliance with OAC rule 3745-31-05(A)(3) also includes compliance with OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(D)	Emissions of Volatile Organic Compounds (VOC) from emissions units K004, K005, and K006 combined, shall not exceed 78.02 tons base on a rolling, 12-month summation. See c)(2) and c)(3).
c.	OAC rule 3745-21-09(Y)(1)(b)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	40 CFR, Part 63, Subpart KK.	See section B.2.

(2) Additional Terms and Conditions

- a. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of a total enclosure and oxidizer to control emissions and compliance with 40 CFR, Part 63, Subpart KK.
- b. All of the VOC emissions from this emissions unit shall be vented to the/a thermal oxidizer that shall meet the operational, monitoring, and record keeping requirements of this permit, when the emissions unit is in operation.

c) Operational Restrictions

- (1) The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be less 1500 degrees Fahrenheit or shall not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance.
- (2) The maximum annual coating usage for emissions units K004, K005, and K006 combined, shall not exceed 4,500,000 lbs., based upon a rolling, 12-month summation of the coating usage figures.
- (3) The maximum annual clean-up solvent usage for emissions units K004, K005, and K006 combined, shall not exceed 135,000 lbs., based upon a rolling 12-month summation of the clean-up solvent usage figures.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal oxidizer when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within ± 1 percent of the temperature being measured or ± 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:
 - a. all 3-hour blocks of time, when the emissions unit(s) controlled by the thermal oxidizer was/were in operation, during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance; and



- b. a log or record of the operating time for the capture (collection) system, thermal oxidizer, monitoring equipment, and the associated emissions unit(s).

These records shall be maintained at the facility for a period of five years.

- (2) The permittee shall maintain monthly records of the following information for this emissions unit:

- a. The total pounds of each coating, ink and cleanup material employed.
- b. The VOC content, in percent by weight for each coating, ink and cleanup material employed.
- c. The rolling, 12-month summation of total pounds of each coating, ink and cleanup material employed.
- d. The total VOC input, in pounds (the summation of each coating, ink, and cleanup material recorded in (2)a. multiplied by the corresponding VOC content recorded in (2)b).
- e. The rolling, 12-month summation of the total VOC input, in pounds.

e) Reporting Requirements

- (1) The permittee shall submit quarterly summaries of the following records:

- a. all 3-hour blocks of time (when the emissions unit(s) was/were in operation) during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature maintained during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance;
- b. any records of downtime (date and length of time) for the capture (collection) system, the thermal oxidizer, and/or the monitoring equipment when the emissions unit(s) was/were in operation; and
- c. a log of the operating time for the capture system, thermal oxidizer, monitoring equipment, and the emissions unit(s).

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (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) 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:
- b. all exceedances of the rolling, 12-month coating usage limitation,



- c. all exceedances of the rolling, 12-month clean up solvent usage limitation,
- d. the probable cause of each deviation (excursion);
- e. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- f. 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, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (3) 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.

The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the thermal oxidizer during the 12-month reporting period for this/these emissions unit(s):

- a. each period of time (start time and date, and end time and date) when the average combustion temperature within the thermal oxidizer was outside of the acceptable range;
- b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the thermal oxidizer;
- c. each incident of deviation described in Aa@ or “b” (above) where a prompt investigation was not conducted;
- d. each incident of deviation described in Aa@ or “b” where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the temperature within the thermal oxidizer into compliance with the acceptable range, was determined to be necessary and was not taken; and
- e. each incident of deviation described in Aa@ or “b” where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

- f) Testing Requirements



- (1) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted approximately 2.5 years after permit issuance and within 6 months prior to permit renewal,
 - b. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency limitation for emissions units K004-K006.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

Method 25.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's Guidelines for Determining Capture Efficiency, dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
- f. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.



g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

(2) Emission Limitation:

Emissions of Volatile Organic Compounds (VOC) from emissions units K004, K005, and K006 combined, shall not exceed 78.02 tons base on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the combined emissions limitation shall be demonstrated by the record keeping requirements specified in d)(2).

(3) Material Usage Restrictions:

The maximum annual coating usage for emissions units K004, K005, and K006 combined, shall not exceed 4,500,000 lbs., based upon a rolling, 12-month summation of the coating usage figures.

The maximum annual clean-up solvent usage for emissions units K004, K005, and K006 combined, shall not exceed 135,000 lbs., based upon a rolling 12-month summation of the clean-up solvent usage figures.

Applicable Compliance Method:

Compliance with the material usage shall be determined by the record keeping requirements specified in d)(2).

(4) The permittee may determine the volatile matter content of the materials based on formulation data, and may rely on volatile matter content data provided by material suppliers. In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR, Part 60, Appendix A, Test Methods 24 or 24A shall be used unless the permittee can demonstrate to the satisfaction of the Ohio EPA that the formulation data is correct.

g) Miscellaneous Requirements

(1) None.