



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.ohio.gov

MAILING ADDRESS:

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

11/16/2009

Randy Slattery
Color Resolutions International LLC
575 QUALITY BLVD
Fairfield, OH 45014

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1409030956
Permit Number: P0105384
Permit Type: Renewal
County: Butler

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, Journal News. 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.ohio.gov/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



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description: Color Resolutions International (CRI) manufactures solvent and water-based ink. CRI is located in Butler County. CRI has accepted restrictions for HAP emissions, OC emissions, and ink production in order to avoid Title V. OC emissions are restricted to less than 100 TPY and HAP emissions are restricted to 9.9 TPY for any individual HAP and 24.9 TPY for any combination of HAPs.

3. Facility Emissions and Attainment Status: CRI is potentially a major source for OC and HAPs without the permit limitations, and is a minor source for all other criteria pollutants. Butler County is currently non-attainment for the 8-hour ozone standard (VOC), non-attainment for particulate matter 2.5 microns and less in diameter (PM2.5), and attainment for all other criteria pollutants.

4. Source Emissions: This permit limits the OC emissions from emissions units P001 – P037, combined, to 64.62 TPY. This permit also limits the Hazardous Air Pollutant (HAP) emissions to less than 10 TPY for any individual HAP and less than 25 TPY for the combined HAPs.

5. Conclusion: This permit limits CRI to a combined annual limit of 64.62 TPY OC and 9.9 TPY for any individual HAP and 24.9 TPY for combined HAPs based on a rolling, 12-month summation. Monthly and annual records of ink production and cleanup material employed will be required to assure compliance. By limiting these emissions to less than 100 TPY OC the facility will avoid the major source threshold and will not trigger Title V requirements.

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	64.62
PM-PM10	0.46
HAP individual	9.9
HAPs combined	24.9

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install and Operate
Color Resolutions International LLC

Issue Date: 11/16/2009
Permit Number: P0105384
Permit Type: Renewal
Permit Description: Administrative modification of PTI 14-05415 to change emissions summary reporting from a quarterly to an annual requirement.
Facility ID: 1409030956
Facility Location: Color Resolutions International LLC
575 QUALITY BLVD,
Fairfield, OH 45014
Facility Description: Printing Ink Manufacturing

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 Paul Tedtman 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.ohio.gov/dapc



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

DRAFT

**Air Pollution Permit-to-Install and Operate
for
Color Resolutions International LLC**

Facility ID: 1409030956
Permit Number: P0105384
Permit Type: Renewal
Issued: 11/16/2009
Effective: To be entered upon final issuance
Expiration: To be entered upon final issuance



Air Pollution Permit-to-Install and Operate
for
Color Resolutions International LLC

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Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0105384

Facility ID: 1409030956

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 1409030956
Application Number(s): M0000558
Permit Number: P0105384
Permit Description: Administrative modification of PTI 14-05415 to change emissions summary reporting from a quarterly to an annual requirement.
Permit Type: Renewal
Permit Fee: \$0.00 *DO NOT send payment at this time - subject to change before final issuance*
Issue Date: 11/16/2009
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:

Color Resolutions International LLC
575 QUALITY BLVD
Fairfield, OH 45014

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



Authorization (continued)

Permit Number: P0105384
 Permit Description: Administrative modification of PTI 14-05415 to change emissions summary reporting from a quarterly to an annual requirement.

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

Emissions Unit ID:	P001
Company Equipment ID:	P001 Extender Tank T-159
Superseded Permit Number:	14-05415
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P002
Company Equipment ID:	P002 Extender Tank T-160
Superseded Permit Number:	14-05415
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P004
Company Equipment ID:	P004 Extender Tank T-157
Superseded Permit Number:	14-05415
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P006
Company Equipment ID:	P006 Extender Tank T-155
Superseded Permit Number:	14-05415
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P007
Company Equipment ID:	Color Tank T-121 with Mixer
Superseded Permit Number:	14-05415
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P008
Company Equipment ID:	Color Tank T-122 with Mixer
Superseded Permit Number:	14-05415
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P011
Company Equipment ID:	Color Tank T-127 with Mixer
Superseded Permit Number:	14-05415
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P012
Company Equipment ID:	90 Black Process T-134
Superseded Permit Number:	14-05415
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P013
Company Equipment ID:	Black Tank T-135
Superseded Permit Number:	14-05415
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P014
Company Equipment ID:	Black Packout System T-136
Superseded Permit Number:	14-05415
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P015
Company Equipment ID:	Black Packout System T-137



Superseded Permit Number:	14-05415
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P016
Company Equipment ID:	Poly Premix Tank T-144 with Mixer
Superseded Permit Number:	14-05415
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P019
Company Equipment ID:	Poly Shot Mill M-115 & Letdown Mixer
Superseded Permit Number:	14-05415
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P022
Company Equipment ID:	Newtrol Premix Tank T-131 with Mixer
Superseded Permit Number:	14-05415
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P023
Company Equipment ID:	Newtrol Premix Tank T-104 with Mixer
Superseded Permit Number:	14-05415
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P024
Company Equipment ID:	Newtrol Shot Mill M-102 & Letdown Mixer
Superseded Permit Number:	14-05415
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P025
Company Equipment ID:	Newtrol Shot Mill M-103 & Letdown Mixer
Superseded Permit Number:	14-05415
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P026
Company Equipment ID:	40 inch Three Roll Mill M-109
Superseded Permit Number:	14-05415
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P027
Company Equipment ID:	32 inch Three Roll Mill No. 5
Superseded Permit Number:	14-05415
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P028
Company Equipment ID:	FSH Mixer MX-106
Superseded Permit Number:	14-05415
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P029
Company Equipment ID:	FSH Mixer MX-107
Superseded Permit Number:	14-05415
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P032
Company Equipment ID:	Roto Mixer M-112
Superseded Permit Number:	14-05415
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P033
Company Equipment ID:	Roto Mixer M-113
Superseded Permit Number:	14-05415
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P037
Company Equipment ID:	24 Pump Ink Dispensing System



State of Ohio Environmental Protection Agency
 Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0105384

Facility ID: 1409030956

Effective Date: To be entered upon final issuance

Superseded Permit Number: 14-05415
 General Permit Category and Type: Not Applicable

Group Name: P003 and P005 Extender Tanks

Emissions Unit ID:	P003
Company Equipment ID:	P003 Extender Tank T-156
Superseded Permit Number:	14-05415
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P005
Company Equipment ID:	P005 Extender Tank T-158
Superseded Permit Number:	14-05415
General Permit Category and Type:	Not Applicable

Group Name: P009 and P010 Color Tanks

Emissions Unit ID:	P009
Company Equipment ID:	Color Tank T-125 with Mixer
Superseded Permit Number:	14-05415
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P010
Company Equipment ID:	Color T-126 with Mixer
Superseded Permit Number:	14-05415
General Permit Category and Type:	Not Applicable

Group Name: P017 and P018 Poly Premix Tanks

Emissions Unit ID:	P017
Company Equipment ID:	Poly Premix Tank MX-118 with Mixer
Superseded Permit Number:	14-05415
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P018
Company Equipment ID:	Poly Premix Tank MX-146 with Mixer
Superseded Permit Number:	14-05415
General Permit Category and Type:	Not Applicable

Group Name: P020 and P021 Mills

Emissions Unit ID:	P020
Company Equipment ID:	Drais Mill & Letdown Mill
Superseded Permit Number:	14-05415
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P021
Company Equipment ID:	Premier Mill & Letdown Tank
Superseded Permit Number:	14-05415
General Permit Category and Type:	Not Applicable

Group Name: P030 and P031 Bench Mixers

Emissions Unit ID:	P030
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State of Ohio Environmental Protection Agency
 Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0105384

Facility ID: 1409030956

Effective Date: To be entered upon final issuance

Company Equipment ID:	Bench Mixer No. 1
Superseded Permit Number:	14-05415
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P031
Company Equipment ID:	Bench Mixer No. 2
Superseded Permit Number:	14-05415
General Permit Category and Type:	Not Applicable

Group Name: P034 - P036 Roto Mixers

Emissions Unit ID:	P034
Company Equipment ID:	Roto Mixer M-114
Superseded Permit Number:	14-05415
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P035
Company Equipment ID:	Roto Mixer M-115
Superseded Permit Number:	14-05415
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P036
Company Equipment ID:	Roto Mixer M-116
Superseded Permit Number:	14-05415
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: P0105384

Facility ID: 1409030956

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: P0105384

Facility ID: 1409030956

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: P0105384

Facility ID: 1409030956

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., and 5.
2. The actual emissions of hazardous air pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units P001 (Extender Tank T-159 with Mixer), P002 (Extender Tank T-160 with Mixer), P003 (Extender Tank T-156 with Mixer), P004 (Extender Tank T-157 with Mixer), P005 (Extender Tank T-158 with Mixer), P006 (Extender Tank T-155 with Mixer), P007 (Color Tank T-121 with Mixer), P008 (Color Tank T-122 with Mixer), P009 (Color Tank T-125 with Mixer), P010 (Color Tank T-126 with Mixer), P011 (Color Tank T-127 with Mixer), P012 (90 Black Process Tank T-134 with Mixer), P013 (Black Tank T-135 with Mixer), P014 (Black Packout System T-136), P015 (Black Packout System T-137), P016 (Poly Premix Tank T-144 with Mixer), P017 (Poly Premix Tank MX-118 with Mixer), P018 (Poly Premix Tank MX-146 with Mixer), P019 (Poly Shot Mill M-115 and Letdown Mixer), P020 (Drais Mill System and Letdown Tank), P021 (Premier Mill and Letdown Mixer), P022 (Newtrol Premix tank T-131 with Mixer), P023 (Newtrol Premix Tank T-104 with Mixer), P024 (Newtrol Shot Mill M-102 and Letdown Mixer), P025 (Newtrol Shot Mill M-103 and Letdown Mixer), P026 (40 inch Three roll Mill M-109), P027 (32 inch Three Roll Mil No. 5), P028 (FSH Mixer MX-106), P029 (FSH Mixer MX-107), P030 (Bench Mixer No. 1), P031 (Bench Mixer No. 2), P032 (Roto Mixer M-112), P033 (Roto Mixer M-113), P034 (Roto Mixer M-114), P035 (Roto Mixer M-115), P036 (Roto Mixer M-116), P037 (24 Pump Ink Dispensing System), P038 (Shot Mill System Number 4), P039 (Shot Mill System Number 5), P040 (Poly Premix Tank T-145), any de minimis emissions units as defined in OAC rule 3745-15-05, any registration status and/or permit exempt emissions units pursuant to OAC rule 3745-31-03, or future constructed emissions units, combined, shall not exceed 9.9 tons per year (TPY) for any single HAP, as a rolling, 12-month summation and 24.9 TPY for any combination of HAPs, as a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with this emission limitation upon permit issuance.

3. The permittee shall collect and record the following information each month for the emissions units identified in 2. above:
 - a) The name and identification number of each HAP-containing ink produced;
 - b) The individual HAP* content for each HAP of each HAP-containing ink, in pounds of individual HAP per pound of HAP-containing ink, as produced;
 - c) The total combined HAP content of each HAP-containing ink, in pounds of combined HAPs per pound of HAP-containing ink, as produced [sum all the individual HAP contents from b)];
 - d) The number of pounds of each HAP-containing ink produced;



- e) The name and identification number of each HAP-containing cleanup material employed;
- f) The individual HAP content for each HAP of each HAP-containing cleanup material, in pounds of individual HAP per pound of HAP-containing cleanup material, as applied;
- g) The total combined HAP content of each HAP-containing cleanup material, in pounds of combined HAPs per pound of HAP-containing cleanup material, as applied [sum all the individual HAP contents from f)];
- h) The number of pounds of each HAP-containing cleanup material employed;
- i) The total individual HAP emissions for each HAP from all HAP-containing inks produced and HAP-containing cleanup materials employed, in pounds or tons per month [for each HAP, the sum of b) times d) times (emission factor designated for each emissions unit) for each HAP-containing ink plus the sum of f) times h) times (1 – fraction recovered) for each HAP-containing cleanup materials, and divided by 2,000 pounds per ton, if the units are in tons];
- j) The total combined HAP emissions from all HAP-containing inks produced and HAP-containing cleanup materials employed, in pounds or tons per month [the sum of c) times d) times (emission factor designated for each emissions unit) for each HAP-containing ink plus the sum of g) times h) times (1 – the solvent recovery rate) for each HAP-containing cleanup material, and divided by 2,000 pounds per tons, if the units are in tons];
- k) The updated rolling, 12-month summation of emissions for each individual HAP, in tons. This shall include the information for the current month and the preceding eleven calendar months; and
- l) The updated rolling, 12-month summation of emissions for the total combined HAPs, in tons. This shall include the information for the current month and the preceding eleven calendar months.

*A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on an individual emissions unit basis.

4. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP emission limitations outlined in 2. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June, and July through September, respectively).

5. Emission Limitation:

9.9 TPY for any single HAP and 24.9 TPY for combined HAPs, based on a rolling 12-month summation for the emissions units listed in 2.

Applicable Compliance Method:

Compliance with the HAP emission limitations shall be demonstrated by the record keeping requirements specified in 3.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0105384

Facility ID: 1409030956

Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. P001, P001 Extender Tank T-159

Operations, Property and/or Equipment Description:

Extender Tank T-159 with Mixer

- 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. d)(2).
 - (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., c)(1), d)(1), e)(1), f)(1)b., f)(3), and f)(4).
- 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)	Organic compound (OC) emissions shall not exceed 1.52 pounds per hour and 30.36 pounds per day. Particulate matter (PM) emissions and particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.05 pound per hour and 0.11 ton per year (TPY). The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-17-07(A)(1).
b.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V	OC emissions shall not exceed 3.21 TPY, based on a rolling, 12-month summation. See b)(2)b., c)(1), and Sections B.2., B.3., B.4., and B.5.
c.	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-17-07(A)(1)	See b)(2)a.

(2) Additional Terms and Conditions

- a. Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
- b. The maximum OC content for the inks produced in this emissions unit shall not exceed 2 percent by weight.
- c. The hourly and daily emission limitations for OC and the hourly and annual emission limitations for PM-PM10 outlined above are based on the emissions unit's potential to emit (PTE) taking into consideration the batch type nature of the operation. Therefore, no hourly and/or daily records are required to demonstrate compliance with these limits.
- d. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the production limitation, OC content limitation, the use of a scrubber for particulate control, and the HAP, OC and PM/PM10 emissions limitations.

c) Operational Restrictions

- (1) The maximum annual ink production rate for this emissions unit shall not exceed 21,400,000 pounds, based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with this production limitation upon permit issuance.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for this emissions unit:
 - a. The name and identification of each batch of ink produced;
 - b. The OC content for each ink produced, in percent by weight;
 - c. The amount of each ink produced, in pounds;
 - d. The rolling, 12-month summation of the ink production figures, in pounds;
 - e. The OC emissions from each ink produced, in pounds or tons, calculated by multiplying the pounds of ink produced by an emission factor of 0.0003 lb OC/pound of ink produced (AP-42 Table 6.4-1; 5/83);
 - f. The rolling, 12-month summation of the total combined OC emissions from all inks produced, in pounds or tons;



- g. The amount of pigments (non-volatiles/solids) employed in tons; and
 - h. The PM-PM10 emissions, in pounds or tons, calculated by multiplying the tons of pigments (non-volatiles/solids) employed by an emission factor of 2 pounds PM-PM10/ton pigment (AP-42 Table 6.7-1; 5/83) and by a scrubber control efficiency of (1-.98).
- (2) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", 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 federally enforceable permit-to-install and operate (FEPTIO) 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 FEPTIO.
- 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:
 - the rolling, 12-month emission limitation for OC emissions specified in b)(1)b.;
 - the OC content limitation specified in b)(2)b.;
 - the rolling, 12-month production limitation specified in c)(1); and
 - the rolling, 12-month emission limitation for HAP emissions specified in Section B.2.
 - 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).



- (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 b)(1) shall be determined in accordance with the following methods:

a. Emission Limitation:

Organic compound (OC) emissions shall not exceed 1.52 pounds per hour and 30.36 pounds per day.

Applicable Compliance Method:

The hourly and daily emission limitations are based upon the emissions unit's potential to emit. Potential OC emissions were determined based on the following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

OC = (5060 pounds of ink produced per hour maximum production) x (0.0003 pound of OC per pound of ink produced emissions factor).

OC = (5060 pounds of ink produced per hour maximum production) x (0.0003 pound of OC per pound of ink produced emissions factor) x (20.0 hours per day maximum hours per day mixing).

b. Emission Limitation:

OC emissions shall not exceed 3.21 TPY, based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month OC emission limitation identified in b)(1)b. shall be demonstrated by the record keeping requirement identified in d)(1).

Actual OC emissions for emissions unit P001 shall be determined based on the following equation from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

OC = Sum of [(pounds of ink produced x 0.0003 pound of OC per pound of ink produced emissions factor / 2000 lbs per ton)] for each ink.

c. Emission Limitation:

Particulate matter (PM) emissions and particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.05 pound per hour and 0.11 ton per year (TPY).



Applicable Compliance Method:

The hourly and annual emission limitations are based upon the emissions unit's potential to emit. Potential PM-PM10 emissions were determined based on the following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

PM-PM10 = (5060 pounds of ink produced per hour maximum production) x (50% by weight of ink is pigment) x (2 pounds of particulate per ton of pigment in ink produced emissions factor) x (1 – 98% control efficiency of scrubber) / (2000 pounds per ton).

PM-PM10 = (21,400,000 pounds of ink produced per year maximum allowable production) x (50% by weight of ink is pigment) x (2 pounds of particulate per ton of pigment in ink produced emissions factor) x (1 – 98% control efficiency of scrubber) / (2000 pounds per ton) / (2000 pounds per ton).

- (2) Compliance with the visible emission limitation shall be based on visible particulate emissions testing per OAC rule 3745-17-03(B)(1), (USEPA Method 9, 40 CFR 60, Appendix A).
 - (3) Compliance with the percent by weight OC content limit in b)(2)b. shall be determined by the record keeping requirements as specified in d)(1).
 - (4) Compliance with the ink production limitation in c)(1) shall be determined by the record keeping requirements as specified in d)(1).
- g) Miscellaneous Requirements
- (1) The terms and conditions of this federally enforceable permit to install and operate supersede the terms and conditions of permit to install 14-05415, as issued on August 21, 2003, for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, and P037.



2. P002, P002 Extender Tank T-160

Operations, Property and/or Equipment Description:

Extender Tank T-160 with Mixer

- 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. d)(2).
 - (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., c)(1), d)(1), e)(1), f)(1)b., f)(3), and f)(4).
- 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)	Organic compound (OC) emissions shall not exceed 2.02 pounds per hour and 41.55 pounds per day. Particulate matter (PM) emissions and particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.04 pound per hour and 0.08 ton per year (TPY). The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-17-07(A)(1).
b.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V	OC emissions shall not exceed 4.20 TPY, based on a rolling, 12-month summation. See b)(2)b., c)(1), and Sections B.2., B.3., B.4., and B.5.
c.	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-17-07(A)(1)	See b)(2)a.

(2) Additional Terms and Conditions

- a. Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
- b. The maximum OC content for the inks produced in this emissions unit shall not exceed 4 percent by weight.
- c. The hourly and daily emission limitations for OC and the hourly and annual emission limitations for PM-PM10 outlined above are based on the emissions unit's potential to emit (PTE) taking into consideration the batch type nature of the operation. Therefore, no daily records are required to demonstrate compliance with these limits.
- d. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the production limitation, OC content limitation, the use of a scrubber for particulate control and the HAP, OC and PM/PM10 emissions limitations.

c) Operational Restrictions

- (1) The maximum annual ink production rate for this emissions unit shall not exceed 14,000,000 pounds, based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with this production limitation upon permit issuance.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for this emissions unit:
 - a. The name and identification of each batch of ink produced;
 - b. The OC content for each ink produced, in percent by weight;
 - c. The amount of each ink produced, in pounds;
 - d. The rolling, 12-month summation of the ink production figures, in pounds;
 - e. The OC emissions from each ink produced, in pounds or tons, calculated by multiplying the pounds of ink produced by an emission factor of 0.0006 lb OC/pound of ink produced (AP-42 Table 6.4-1; 5/83);
 - f. The rolling, 12-month summation of the total combined OC emissions from all inks produced, in pounds or tons;



- (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 b)(1) shall be determined in accordance with the following methods:

a. Emission Limitation:

Organic compound (OC) emissions shall not exceed 2.02 pounds per hour and 41.55 pounds per day.

Applicable Compliance Method:

The hourly and daily emission limitations are based upon the emissions unit's potential to emit. Potential OC emissions were determined based on the following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$OC = (3367 \text{ pounds of ink produced per hour maximum production}) \times (0.0006 \text{ pound of OC per pound of ink produced emissions factor}).$

$OC = (3367 \text{ pounds of ink produced per hour maximum production}) \times (0.0006 \text{ pound of OC per pound of ink produced emissions factor}) \times (20.6 \text{ hours per day maximum hours per day mixing}).$

b. Emission Limitation:

OC emissions shall not exceed 4.20 TPY, based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month OC emission limitation identified in b)(1)b. shall be demonstrated by the record keeping requirement identified in d)(1).

Actual OC emissions for emissions unit P002 shall be determined based on the following equation from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$OC = \text{Sum of } [(pounds \text{ of ink produced} \times 0.0006 \text{ pound of OC per pound of ink produced emissions factor} / 2000 \text{ lbs per ton})]$ for each ink.

c. Emission Limitation:

Particulate matter (PM) emissions and particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.04 pound per hour and 0.08 ton per year (TPY).



Applicable Compliance Method:

The hourly and annual emission limitations are based upon the emissions unit's potential to emit. Potential PM-PM10 emissions were determined based on the following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

PM-PM10 = (3367 pounds of ink produced per hour maximum production) x (60% by weight of ink is pigment) x (2 pounds of particulate per ton of pigment in ink produced emissions factor) x (1 – 98% control efficiency of scrubber) / (2000 pounds per ton).

PM-PM10 = (14,000,000 pounds of ink produced per year maximum allowable production) x (60% by weight of ink is pigment) x (2 pounds of particulate per ton of pigment in ink produced emissions factor) x (1 – 98% control efficiency of scrubber) / (2000 pounds per ton) / (2000 pounds per ton).

- (2) Compliance with the visible emission limitation shall be based on visible particulate emissions testing per OAC rule 3745-17-03(B)(1), (USEPA Method 9, 40 CFR 60, Appendix A).
- (3) Compliance with the percent by weight OC content limit in b)(2)b. shall be determined by the record keeping requirements as specified in d)(1).
- (4) Compliance with the ink production limitation in c)(1) shall be determined by the record keeping requirements as specified in d)(1).

g) Miscellaneous Requirements

- (1) The terms and conditions of this federally enforceable permit to install and operate supersede the terms and conditions of permit to install 14-05415, as issued on August 21, 2003, for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, and P037.



3. P004, P004 Extender Tank T-157

Operations, Property and/or Equipment Description:

Extender Tank T-157 with Mixer

- 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. d)(2).
 - (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)(2)c., b)(2)d., c)(1), d)(1), e)(1), f)(1)b., f)(3), and f)(4).
- 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)	Organic compound (OC) emissions shall not exceed 0.82 pound per hour and 16.76 pounds per day. Particulate matter (PM) emissions and particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.01 pound per hour and 0.01 ton per year (TPY). The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-17-07(A)(1).
b.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V	See b)(2)c., b)(2)d., c)(1), and Sections B.2., B.3., B.4., and B.5.
c.	OAC rule 3745-17-11	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.	OAC rule 3745-17-07(A)(1)	See b)(2)b.



(2) Additional Terms and Conditions

- a. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of tight-fitting covers, production limitation, OC content limitation, the use of a scrubber for particulate control and compliance with the HAP, OC and PM/PM10 emissions limitations.
- b. Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
- c. The maximum OC content for the inks produced in this emissions unit shall not exceed 10 percent by weight.
- d. The combined annual organic compound (OC) emissions from emissions units P003, P004, and P005 shall not exceed 8.63 tons per year (TPY), based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with this emission limitation upon permit issuance.
- e. The hourly and daily emission limitations for OC and the hourly and annual emission limitations for PM-PM10 outlined above are based on the emissions unit's potential to emit (PTE) taking into consideration the batch type nature of the operation. Therefore, no daily records are required to demonstrate compliance with these limits.

c) Operational Restrictions

- (1) The maximum annual ink production rate for emissions units P003, P004, and P005, combined, shall not exceed 15,000,000 pounds, based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with this production limitation upon permit issuance.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for emissions units P003, P004, and P005, combined:
 - a. The name and identification of each batch of ink produced;
 - b. The OC content for each ink produced, in percent by weight;
 - c. The amount of each ink produced, in pounds;
 - d. The rolling, 12-month summation of the ink production figures, in pounds;
 - e. The OC emissions from each ink produced, in pounds or tons, calculated by multiplying the pounds of ink produced by an emission factor of 0.00115 lb OC/pound of ink produced (NAPIM Table 3-3; 3/96);



- f. The rolling, 12-month summation of the total combined OC emissions from all inks produced, in pounds or tons;
 - g. The amount of pigments (non-volatiles/solids) employed in tons; and
 - h. The PM-PM10 emissions, in pounds or tons, calculated by multiplying the tons of pigments (non-volatiles/solids) employed by an emission factor of 2 pounds PM-PM10/ton pigment (AP-42 Table 6.7-1; 5/83) and by a scrubber control efficiency of (1-.98).
- (2) Modeling to demonstrate compliance with, the “Toxic Air Contaminant Statute”, 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 federally enforceable permit-to-install and operate (FEPTIO) 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 FEPTIO.
- 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:
 - the rolling, 12-month emission limitation for OC emissions specified in b)(2)d.;
 - the OC content limitation specified in b)(2)c.;
 - the rolling, 12-month production limitation specified in c)(1); and
 - the rolling, 12-month emission limitation for HAP emissions specified in Section B.2.
 - 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).

- (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 b)(1) and b)(2) shall be determined in accordance with the following methods:

a. Emission Limitation:

Organic compound (OC) emissions shall not exceed 0.82 pounds per hour and 16.76 pounds per day.

Applicable Compliance Method:

The hourly and daily emission limitations are based upon the emissions unit's potential to emit. Potential OC emissions were determined based on the following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$OC = (708 \text{ pounds of ink produced per hour maximum production}) \times (0.00115 \text{ pound of OC per pound of ink produced emissions factor}).$

$OC = (708 \text{ pounds of ink produced per hour maximum production}) \times (0.00115 \text{ pound of OC per pound of ink produced emissions factor}) \times (20.6 \text{ hours per day maximum hours per day mixing}).$

b. Emission Limitation:

The combined annual organic compound (OC) emissions from emissions units P003, P004, and P005 shall not exceed 8.63 tons per year (TPY), based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month OC emission limitation identified in b)(2)d. shall be demonstrated by the record keeping requirement identified in d)(1).

Actual OC emissions for emissions units P003, P004, and P005 shall be determined based on the following equation from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$OC = \text{Sum of } [(pounds \text{ of ink produced} \times 0.00115 \text{ pound of OC per pound of ink produced emissions factor} / 2000 \text{ lbs per ton})]$ for each ink, and for each emissions unit.



c. Emission Limitation:

Particulate matter (PM) emissions and particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.01 pound per hour and 0.01 ton per year (TPY).

Applicable Compliance Method:

The hourly and annual emission limitations are based upon the emissions unit's potential to emit. Potential PM-PM10 emissions were determined based on the following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$PM-PM10 = (708 \text{ pounds of ink produced per hour maximum production}) \times (50\% \text{ by weight of ink is pigment}) \times (2 \text{ pounds of particulate per ton of pigment in ink produced emissions factor}) \times (1 - 98\% \text{ control efficiency of scrubber}) / (2000 \text{ pounds per ton}).$

$PM-PM10 = (2,100,000 \text{ pounds of ink produced per year maximum production}) \times (50\% \text{ by weight of ink is pigment}) \times (2 \text{ pounds of particulate per ton of pigment in ink produced emissions factor}) \times (1 - 98\% \text{ control efficiency of scrubber}) / (2000 \text{ pounds per ton}) / (2000 \text{ pounds per ton}).$

- (2) Compliance with the visible emission limitation shall be based on visible particulate emissions testing per OAC rule 3745-17-03(B)(1), (USEPA Method 9, 40 CFR 60, Appendix A).
- (3) Compliance with the percent by weight OC content limit in b)(2)c. shall be determined by the record keeping requirements as specified in d)(1).
- (4) Compliance with the ink production limitation in c)(1) shall be determined by the record keeping requirements as specified in d)(1).

g) Miscellaneous Requirements

- (1) The terms and conditions of this federally enforceable permit to install and operate supersede the terms and conditions of permit to install 14-05415, as issued on August 21, 2003, for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, and P037.



4. P006, P006 Extender Tank T-155

Operations, Property and/or Equipment Description:

Extender Tank T-155 with Mixer

- 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. d)(2).
 - (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., c)(1), d)(1), e)(1), f)(1)b., f)(3), and f)(4).
- 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)	Organic compound (OC) emissions shall not exceed 3.65 pounds per hour and 75.09 pounds per day. Particulate matter (PM) emissions and particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.01 pound per hour and 0.02 ton per year (TPY). The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-17-07(A)(1).
b.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V	OC emissions shall not exceed 5.08 TPY, based on a rolling, 12-month summation. See b)(2)b., c)(1), and Sections B.2., B.3., B.4., and B.5.
c.	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-17-07(A)(1)	See b)(2)a.

(2) Additional Terms and Conditions

- a. Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
- b. The maximum OC content for the inks produced in this emissions unit shall not exceed 20 percent by weight.
- c. The hourly and daily emission limitations for OC and the hourly and annual emission limitations for PM-PM10 outlined above are based on the emissions unit's potential to emit (PTE) taking into consideration the batch type nature of the operation. Therefore, no daily records are required to demonstrate compliance with these limits.
- d. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the production limitation, OC content limitation, the use of a scrubber for particulate control, and the HAP, OC and PM/PM10 emissions limitations.

c) Operational Restrictions

- (1) The maximum annual ink production rate for this emissions unit shall not exceed 3,386,667 pounds, based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with this production limitation upon permit issuance.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for this emissions unit:
 - a. The name and identification of each batch of ink produced;
 - b. The OC content for each ink produced, in percent by weight;
 - c. The amount of each ink produced, in pounds;
 - d. The rolling, 12-month summation of the ink production figures, in pounds;
 - e. The OC emissions from each ink produced, in pounds or tons, calculated by multiplying the pounds of ink produced by an emission factor of 0.003 lb OC/pound of ink produced (AP-42 Table 6.4-1; 5/83);
 - f. The rolling, 12-month summation of the total combined OC emissions from all inks produced, in pounds or tons;



- g. The amount of pigments (non-volatiles/solids) employed in tons; and
 - h. The PM-PM10 emissions, in pounds or tons, calculated by multiplying the tons of pigments (non-volatiles/solids) employed by an emission factor of 2 pounds PM-PM10/ton pigment (AP-42 Table 6.7-1; 5/83) and by a scrubber control efficiency of (1-.98).
- (2) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", 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 federally enforceable permit-to-install and operate (FEPTIO) 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 FEPTIO.
- 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:
 - the rolling, 12-month emission limitation for OC emissions specified in b)(1)b.;
 - the OC content limitation specified in b)(2)b.;
 - the rolling, 12-month production limitation specified in c)(1); and
 - the rolling, 12-month emission limitation for HAP emissions specified in Section B.2.
 - 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).



- (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 b)(1) shall be determined in accordance with the following methods:

a. Emission Limitation:

Organic compound (OC) emissions shall not exceed 3.65 pounds per hour and 75.09 pounds per day.

Applicable Compliance Method:

The hourly and daily emission limitations are based upon the emissions unit's potential to emit. Potential OC emissions were determined based on the following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$OC = (1217 \text{ pounds of ink produced per hour maximum production}) \times (0.003 \text{ pound of OC per pound of ink produced emissions factor}).$

$OC = (1217 \text{ pounds of ink produced per hour maximum production}) \times (0.003 \text{ pound of OC per pound of ink produced emissions factor}) \times (20.6 \text{ hours per day maximum hours per day mixing}).$

b. Emission Limitation:

OC emissions shall not exceed 5.08 TPY, based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month OC emission limitation identified in b)(1)b. shall be demonstrated by the record keeping requirement identified in d)(1).

Actual OC emissions for emissions unit P006 shall be determined based on the following equation from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$OC = \text{Sum of } [(pounds \text{ of ink produced} \times 0.003 \text{ pound of OC per pound of ink produced emissions factor} / 2000 \text{ lbs per ton})]$ for each ink.

c. Emission Limitation:

Particulate matter (PM) emissions and particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.01 pound per hour and 0.02 ton per year (TPY).



Applicable Compliance Method:

The hourly and annual emission limitations are based upon the emissions unit's potential to emit. Potential PM-PM10 emissions were determined based on the following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$$\text{PM-PM10} = (1217 \text{ pounds of ink produced per hour maximum production}) \times (50\% \text{ by weight of ink is pigment}) \times (2 \text{ pounds of particulate per ton of pigment in ink produced emissions factor}) \times (1 - 98\% \text{ control efficiency of scrubber}) / (2000 \text{ pounds per ton}).$$

$$\text{PM-PM10} = (3,386,667 \text{ pounds of ink produced per year maximum production}) \times (50\% \text{ by weight of ink is pigment}) \times (2 \text{ pounds of particulate per ton of pigment in ink produced emissions factor}) \times (1 - 98\% \text{ control efficiency of scrubber}) / (2000 \text{ pounds per ton}) / (2000 \text{ pounds per ton}).$$

- (2) Compliance with the visible emission limitation shall be based on visible particulate emissions testing per OAC rule 3745-17-03(B)(1), (USEPA Method 9, 40 CFR 60, Appendix A).
- (3) Compliance with the percent by weight OC content limit in b)(2)b. shall be determined by the record keeping requirements as specified in d)(1).
- (4) Compliance with the ink production limitation in c)(1) shall be determined by the record keeping requirements as specified in d)(1).

g) Miscellaneous Requirements

- (1) The terms and conditions of this federally enforceable permit to install and operate supersede the terms and conditions of permit to install 14-05415, as issued on August 21, 2003, for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, and P037.



5. P007, Color Tank T-121 with Mixer

Operations, Property and/or Equipment Description:

Color Tank T-121 with Mixer

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. d)(2).

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

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)	Organic compound (OC) emissions shall not exceed 1.47 pounds per hour and 30.53 pounds per day. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V	See b)(2)a., b)(2)c., c)(1), and Sections B.2., B.3., B.4., and B.5.

(2) Additional Terms and Conditions

a. The maximum OC content for the inks produced in this emissions unit shall not exceed 4 percent by weight.

b. The hourly and daily emission limitations for OC outlined above are based on the emissions unit's potential to emit (PTE) taking into consideration the batch type nature of the operation. Therefore, no daily records are required to demonstrate compliance with these limits.



- c. The combined annual organic compound (OC) emissions from emissions units P007 and P008 shall not exceed 5.10 tons per year (TPY), based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with this emission limitation upon permit issuance.

- d. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the production limitation, OC content limitation, and the HAP and OC emissions limitations.

c) Operational Restrictions

- (1) The maximum annual ink production rate for emissions units P007 and P008 shall not exceed 17,000,000 pounds, based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with this production limitation upon permit issuance.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for emissions units P007 and P008, combined:

- a. The name and identification of each batch of ink produced;
- b. The OC content for each ink produced, in percent by weight;
- c. The amount of each ink produced, in pounds;
- d. The rolling, 12-month summation of the ink production figures, in pounds;
- e. The OC emissions from each ink produced, in pounds or tons, calculated by multiplying the pounds of ink produced by an emission factor of 0.0006 lb OC/pound of ink produced (AP-42 Table 6.4-1; 5/83); and
- f. The rolling, 12-month summation of the total combined OC emissions from all inks produced, in pounds or tons.

- (2) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", 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 federally enforceable permit-to-install and operate (FEPTIO) 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 FEPTIO.

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:

the rolling, 12-month emission limitation for OC emissions specified in b)(2)c.;

the OC content limitation specified in b)(2)a.;

the rolling, 12-month production limitation specified in c)(1); and

the rolling, 12-month emission limitation for HAP emissions specified in Section B.2.

- 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).

- (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 b)(1) and b)(2) shall be determined in accordance with the following methods:

- a. Emission Limitation:

Organic compound (OC) emissions shall not exceed 1.47 pounds per hour and 30.53 pounds per day.

Applicable Compliance Method:

The hourly and daily emission limitations are based upon the emissions unit's potential to emit. Potential OC emissions were determined based on the



following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$$OC = (2446 \text{ pounds of ink produced per hour maximum production}) \times (0.0006 \text{ pound of OC per pound of ink produced emissions factor}).$$

$$OC = (2446 \text{ pounds of ink produced per hour maximum production}) \times (0.0006 \text{ pound of OC per pound of ink produced emissions factor}) \times (20.8 \text{ hours per day maximum hours per day mixing}).$$

b. Emission Limitation:

The combined annual organic compound (OC) emissions from emissions units P007 and P008 shall not exceed 5.10 tons per year (TPY), based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month OC emission limitation identified in b)(2)c. shall be demonstrated by the record keeping requirement identified in d)(1).

Actual OC emissions for emissions units P007 and P008 shall be determined based on the following equation from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$$OC = \text{Sum of } [(pounds \text{ of ink produced} \times 0.0006 \text{ pound of OC per pound of ink produced emissions factor} / 2000 \text{ lbs per ton)] \text{ for each ink, and for each emissions unit.}$$

- (2) Compliance with the percent by weight OC content limit in b)(2)a. shall be determined by the record keeping requirements as specified in d)(1).
- (3) Compliance with the ink production limitation in c)(1) shall be determined by the record keeping requirements as specified in d)(1).

g) Miscellaneous Requirements

- (1) The terms and conditions of this federally enforceable permit to install and operate supersede the terms and conditions of permit to install 14-05415, as issued on August 21, 2003, for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, and P037.



6. P008, Color Tank T-122 with Mixer

Operations, Property and/or Equipment Description:

Color Tank T-122 with Mixer

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. d)(2).

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

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)	Organic compound (OC) emissions shall not exceed 1.67 pounds per hour and 36.00 pounds per day. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V	See b)(2)a., b)(2)c., c)(1), and Sections B.2., B.3., B.4., and B.5.

(2) Additional Terms and Conditions

a. The maximum OC content for the inks produced in this emissions unit shall not exceed 4 percent by weight.

b. The hourly and daily emission limitations for OC outlined above are based on the emissions unit's potential to emit (PTE) taking into consideration the batch type nature of the operation. Therefore, no daily records are required to demonstrate compliance with these limits.



- c. The combined annual organic compound (OC) emissions from emissions units P007 and P008 shall not exceed 5.10 tons per year (TPY), based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with this emission limitation upon permit issuance.

- d. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the production limitation, OC content limitation, and the HAP and OC emissions limitations.

c) Operational Restrictions

- (1) The maximum annual ink production rate for emissions units P007 and P008 shall not exceed 17,000,000 pounds, based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with this production limitation upon permit issuance.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for emissions units P007 and P008, combined:

- a. The name and identification of each batch of ink produced;
- b. The OC content for each ink produced, in percent by weight;
- c. The amount of each ink produced, in pounds;
- d. The rolling, 12-month summation of the ink production figures, in pounds;
- e. The OC emissions from each ink produced, in pounds or tons, calculated by multiplying the pounds of ink produced by an emission factor of 0.0006 lb OC/pound of ink produced (AP-42 Table 6.4-1; 5/83); and
- f. The rolling, 12-month summation of the total combined OC emissions from all inks produced, in pounds or tons.

- (2) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", 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 federally enforceable permit-to-install and operate (FEPTIO) 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 FEPTIO.

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:

the rolling, 12-month emission limitation for OC emissions specified in b)(2)c.;

the OC content limitation specified in b)(2)a.;

the rolling, 12-month production limitation specified in c)(1); and

the rolling, 12-month emission limitation for HAP emissions specified in Section B.2.

- 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).

- (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 b)(1) and b)(2) shall be determined in accordance with the following methods:

- a. Emission Limitation:

Organic compound (OC) emissions shall not exceed 1.67 pounds per hour and 36.00 pounds per day.

Applicable Compliance Method:

The hourly and daily emission limitations are based upon the emissions unit's potential to emit. Potential OC emissions were determined based on the



following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$OC = (2778 \text{ pounds of ink produced per hour maximum production}) \times (0.0006 \text{ pound of OC per pound of ink produced emissions factor}).$

$OC = (2778 \text{ pounds of ink produced per hour maximum production}) \times (0.0006 \text{ pound of OC per pound of ink produced emissions factor}) \times (21.6 \text{ hours per day maximum hours per day mixing}).$

b. Emission Limitation:

The combined annual organic compound (OC) emissions from emissions units P007 and P008 shall not exceed 5.10 tons per year (TPY), based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month OC emission limitation identified in b)(2)c. shall be demonstrated by the record keeping requirement identified in d)(1).

Actual OC emissions for emissions units P007 and P008 shall be determined based on the following equation from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$OC = \text{Sum of } [(pounds \text{ of ink produced} \times 0.0006 \text{ pound of OC per pound of ink produced emissions factor} / 2000 \text{ lbs per ton)] \text{ for each ink, and for each emissions unit.}$

- (2) Compliance with the percent by weight OC content limit in b)(2)a. shall be determined by the record keeping requirements as specified in d)(1).
- (3) Compliance with the ink production limitation in c)(1) shall be determined by the record keeping requirements as specified in d)(1).

g) Miscellaneous Requirements

- (1) The terms and conditions of this federally enforceable permit to install and operate supersede the terms and conditions of permit to install 14-05415, as issued on August 21, 2003, for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, and P037.



7. P011, Color Tank T-127 with Mixer

Operations, Property and/or Equipment Description:

Color Tank T-127 with Mixer

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. d)(2).

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

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)	Organic compound (OC) emissions shall not exceed 2.01 pounds per hour and 38.64 pounds per day. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V	See b)(2)b., b)(2)d., c)(1), and Sections B.2., B.3., B.4., and B.5.

(2) Additional Terms and Conditions

a. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the production limitation, OC content limitation, and the HAP and OC emissions limitations.

b. The maximum OC content for the inks produced in this emissions unit shall not exceed 10 percent by weight.



- c. The hourly and daily emission limitations for OC outlined above are based on the emissions unit's potential to emit (PTE) taking into consideration the batch type nature of the operation. Therefore, no daily records are required to demonstrate compliance with these limits.
- d. The combined annual organic compound (OC) emissions from emissions units P009, P010, and P011 shall not exceed 8.05 tons per year (TPY), based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with this emission limitation upon permit issuance.

c) Operational Restrictions

- (1) The maximum annual ink production rate for emissions units P009, P010, and P011 shall not exceed 14,000,000 pounds, based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with this production limitation upon permit issuance.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for emissions units P009, P010, and P011, combined:
 - a. The name and identification of each batch of ink produced;
 - b. The OC content for each ink produced, in percent by weight;
 - c. The amount of each ink produced, in pounds;
 - d. The rolling, 12-month summation of the ink production figures, in pounds;
 - e. The OC emissions from each ink produced, in pounds or tons, calculated by multiplying the pounds of ink produced by an emission factor of 0.00115 lb OC/pound of ink produced (NAPIM Table 3-3; 3/96); and
 - f. The rolling, 12-month summation of the total combined OC emissions from all inks produced, in pounds or tons.

- (2) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", 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 federally enforceable permit-to-install and operate (FEPTIO) 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 FEPTIO.

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:

the rolling, 12-month emission limitation for OC emissions specified in b)(2)d.;

the OC content limitation specified in b)(2)b.;

the rolling, 12-month production limitation specified in c)(1); and

the rolling, 12-month emission limitation for HAP emissions specified in Section B.2.

- 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).

- (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 b)(1) and b)(2) shall be determined in accordance with the following methods:

- a. Emission Limitation:

Organic compound (OC) emissions shall not exceed 2.01 pounds per hour and 38.64 pounds per day.

Applicable Compliance Method:

The hourly and daily emission limitations are based upon the emissions unit's potential to emit. Potential OC emissions were determined based on the



following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$OC = (1750 \text{ pounds of ink produced per hour maximum production}) \times (0.00115 \text{ pound of OC per pound of ink produced emissions factor})$.

$OC = (1750 \text{ pounds of ink produced per hour maximum production}) \times (0.00115 \text{ pound of OC per pound of ink produced emissions factor}) \times (19.2 \text{ hours per day maximum hours per day mixing})$.

b. Emission Limitation:

The combined annual organic compound (OC) emissions from emissions units P009, P010, and P011 shall not exceed 8.05 tons per year (TPY), based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month OC emission limitation identified in b)(2)d. shall be demonstrated by the record keeping requirement identified in d)(1).

Actual OC emissions for emissions units P009, P010, and P011 shall be determined based on the following equation from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$OC = \text{Sum of } [(pounds \text{ of ink produced} \times 0.00115 \text{ pound of OC per pound of ink produced emissions factor} / 2000 \text{ lbs per ton})]$ for each ink, and for each emissions unit.

- (2) Compliance with the percent by weight OC content limit in b)(2)b. shall be determined by the record keeping requirements as specified in d)(1).
- (3) Compliance with the ink production limitation in c)(1) shall be determined by the record keeping requirements as specified in d)(1).

g) Miscellaneous Requirements

- (1) The terms and conditions of this federally enforceable permit to install and operate supersede the terms and conditions of permit to install 14-05415, as issued on August 21, 2003, for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, and P037.



8. P012, 90 Black Process T-134

Operations, Property and/or Equipment Description:

90 Black Process Tank T-134 with Mixer

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. d)(2).

(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)(2)c., b)(2)e., c)(1), d)(1), e)(1), f)(1)b., f)(3), and f)(4).

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)	Organic compound (OC) emissions shall not exceed 2.76 pounds per hour and 55.20 pounds per day. Particulate matter (PM) emissions and particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.02 pound per hour and 0.02 ton per year (TPY). The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-17-07(A)(1).
b.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V	See b)(2)c., b)(2)e., c)(1), and Sections B.2., B.3., B.4., and B.5.
c.	OAC rule 3745-17-11	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.	OAC rule 3745-17-07(A)(1)	See b)(2)b.



(2) Additional Terms and Conditions

- a. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the production limitation, OC content limitation, the use of a scrubber for particulate control, and the HAP, OC and PM/PM10 emissions limitations.
- b. Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
- c. The maximum OC content for the inks produced in this emissions unit shall not exceed 4 percent by weight.
- d. The hourly and daily emission limitations for OC and the hourly and annual emission limitations for PM-PM10 outlined above are based on the emissions unit's potential to emit (PTE) taking into consideration the batch type nature of the operation. Therefore, no daily records are required to demonstrate compliance with these limits.
- e. The combined annual organic compound (OC) emissions from emissions units P012 and P013, combined, shall not exceed 5.40 tons per year (TPY), based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with this emission limitation upon permit issuance.

c) Operational Restrictions

- (1) The maximum annual ink production rate for emissions units P012 and P013 shall not exceed 18,000,000 pounds, based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with this production limitation upon permit issuance.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for emissions units P012 and P013, combined:
 - a. The name and identification of each batch of ink produced;
 - b. The OC content for each ink produced, in percent by weight;
 - c. The amount of each ink produced, in pounds;
 - d. The rolling, 12-month summation of the ink production figures, in pounds;
 - e. The OC emissions from each ink produced, in pounds or tons, calculated by multiplying the pounds of ink produced by an emission factor of 0.0006 lb OC/pound of ink produced (AP-42 Table 6.4-1; 5/83);



- f. The rolling, 12-month summation of the total combined OC emissions from all inks produced, in pounds or tons;
 - g. The amount of pigments (non-volatiles/solids) employed in tons; and
 - h. The PM-PM10 emissions, in pounds or tons, calculated by multiplying the tons of pigments (non-volatiles/solids) employed by an emission factor of 2 pounds PM-PM10/ton pigment (AP-42 Table 6.7-1; 5/83) and by a scrubber control efficiency of (1-.98).
- (2) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", 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 federally enforceable permit-to-install and operate (FEPTIO) 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 FEPTIO.
- 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:
 - the rolling, 12-month emission limitation for OC emissions specified in b)(2)e.;
 - the OC content limitation specified in b)(2)c.;
 - the rolling, 12-month production limitation specified in c)(1); and
 - the rolling, 12-month emission limitation for HAP emissions specified in Section B.2.
 - 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).

- (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 b)(1) and b)(2) shall be determined in accordance with the following methods:

a. Emission Limitation:

Organic compound (OC) emissions shall not exceed 2.76 pounds per hour and 55.20 pounds per day.

Applicable Compliance Method:

The hourly and daily emission limitations are based upon the emissions unit's potential to emit. Potential OC emissions were determined based on the following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$OC = (4600 \text{ pounds of ink produced per hour maximum production}) \times (0.0006 \text{ pound of OC per pound of ink produced emissions factor}).$

$OC = (4600 \text{ pounds of ink produced per hour maximum production}) \times (0.0006 \text{ pound of OC per pound of ink produced emissions factor}) \times (20.0 \text{ hours per day maximum hours per day mixing}).$

b. Emission Limitation:

The combined annual organic compound (OC) emissions from emissions units P012 and P013, combined, shall not exceed 5.40 tons per year (TPY), based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month OC emission limitation identified in b)(2)e. shall be demonstrated by the record keeping requirement identified in d)(1).

Actual OC emissions for emissions units P012 and P013 shall be determined based on the following equation from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$OC = \text{Sum of } [(pounds \text{ of ink produced} \times 0.0006 \text{ pound of OC per pound of ink produced emissions factor} / 2000 \text{ lbs per ton})]$ for each ink, and for each emissions unit.



c. Emission Limitation:

Particulate matter (PM) emissions and particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.02 pound per hour and 0.02 ton per year (TPY).

Applicable Compliance Method:

The hourly and annual emission limitations are based upon the emissions unit's potential to emit. Potential PM-PM10 emissions were determined based on the following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$PM-PM10 = (4600 \text{ pounds of ink produced per hour maximum production}) \times (22\% \text{ by weight of ink is pigment}) \times (2 \text{ pounds of particulate per ton of pigment in ink produced emissions factor}) \times (1 - 98\% \text{ control efficiency of scrubber}) / (2000 \text{ pounds per ton}).$

$PM-PM10 = (9,600,000 \text{ pounds of ink produced per year maximum production}) \times (22\% \text{ by weight of ink is pigment}) \times (2 \text{ pounds of particulate per ton of pigment in ink produced emissions factor}) \times (1 - 98\% \text{ control efficiency of scrubber}) / (2000 \text{ pounds per ton}) / (2000 \text{ pounds per ton}).$

- (2) Compliance with the visible emission limitation shall be based on visible particulate emissions testing per OAC rule 3745-17-03(B)(1), (USEPA Method 9, 40 CFR 60, Appendix A).
- (3) Compliance with the percent by weight OC content limit in b)(2)c. shall be determined by the record keeping requirements as specified in d)(1).
- (4) Compliance with the ink production limitation in c)(1) shall be determined by the record keeping requirements as specified in d)(1).

g) Miscellaneous Requirements

- (1) The terms and conditions of this federally enforceable permit to install and operate supersede the terms and conditions of permit to install 14-05415, as issued on August 21, 2003, for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, and P037.



9. P013, Black Tank T-135

Operations, Property and/or Equipment Description:

Black Tank T-135 with Mixer

- 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. d)(2).
 - (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)(2)c., b)(2)e., c)(1), d)(1), e)(1), f)(1)b., f)(3), and f)(4).
- 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)	Organic compound (OC) emissions shall not exceed 2.00 pounds per hour and 41.14 pounds per day. Particulate matter (PM) emissions and particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.01 pound per hour and 0.02 ton per year (TPY). The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-17-07(A)(1).
b.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V	See b)(2)c., b)(2)e., c)(1), and Sections B.2., B.3., B.4., and B.5.
c.	OAC rule 3745-17-11	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.	OAC rule 3745-17-07(A)(1)	See b)(2)b.



(2) Additional Terms and Conditions

- a. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the production limitation, OC content limitation, the use of a scrubber for particulate control, and the HAP, OC and PM/PM10 emissions limitations.
- b. Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
- c. The maximum OC content for the inks produced in this emissions unit shall not exceed 4 percent by weight.
- d. The hourly and daily emission limitations for OC and the hourly and annual emission limitations for PM-PM10 outlined above are based on the emissions unit's potential to emit (PTE) taking into consideration the batch type nature of the operation. Therefore, no daily records are required to demonstrate compliance with these limits.
- e. The combined annual organic compound (OC) emissions from emissions units P012 and P013, combined, shall not exceed 5.40 tons per year (TPY), based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with this emission limitation upon permit issuance.

c) Operational Restrictions

- (1) The maximum annual ink production rate for emissions units P012 and P013 shall not exceed 18,000,000 pounds, based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with this production limitation upon permit issuance.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for emissions units P012 and P013, combined:
 - a. The name and identification of each batch of ink produced;
 - b. The OC content for each ink produced, in percent by weight;
 - c. The amount of each ink produced, in pounds;
 - d. The rolling, 12-month summation of the ink production figures, in pounds;
 - e. The OC emissions from each ink produced, in pounds or tons, calculated by multiplying the pounds of ink produced by an emission factor of 0.0006 lb OC/pound of ink produced (AP-42 Table 6.4-1; 5/83);



- f. The rolling, 12-month summation of the total combined OC emissions from all inks produced, in pounds or tons;
- g. The amount of pigments (non-volatiles/solids) employed in tons; and
- h. The PM-PM10 emissions, in pounds or tons, calculated by multiplying the tons of pigments (non-volatiles/solids) employed by an emission factor of 2 pounds PM-PM10/ton pigment (AP-42 Table 6.7-1; 5/83) and by a scrubber control efficiency of (1-.98).

(2) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", 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 federally enforceable permit-to-install and operate (FEPTIO) 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 FEPTIO.

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:
 - the rolling, 12-month emission limitation for OC emissions specified in b)(2)e.;
 - the OC content limitation specified in b)(2)c.;
 - the rolling, 12-month production limitation specified in c)(1); and
 - the rolling, 12-month emission limitation for HAP emissions specified in Section B.2.
 - 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).

- (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 b)(1) and b)(2) shall be determined in accordance with the following methods:

a. Emission Limitation:

Organic compound (OC) emissions shall not exceed 2.00 pounds per hour and 41.14 pounds per day.

Applicable Compliance Method:

The hourly and daily emission limitations are based upon the emissions unit's potential to emit. Potential OC emissions were determined based on the following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$OC = (3333 \text{ pounds of ink produced per hour maximum production}) \times (0.0006 \text{ pound of OC per pound of ink produced emissions factor}).$

$OC = (3333 \text{ pounds of ink produced per hour maximum production}) \times (0.0006 \text{ pound of OC per pound of ink produced emissions factor}) \times (20.6 \text{ hours per day maximum hours per day mixing}).$

b. Emission Limitation:

The combined annual organic compound (OC) emissions from emissions units P012 and P013, combined, shall not exceed 5.40 tons per year (TPY), based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month OC emission limitation identified in b)(2)e. shall be demonstrated by the record keeping requirement identified in d)(1).

Actual OC emissions for emissions units P012 and P013 shall be determined based on the following equation from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$OC = \text{Sum of } [(pounds \text{ of ink produced} \times 0.0006 \text{ pound of OC per pound of ink produced emissions factor} / 2000 \text{ lbs per ton})]$ for each ink, and for each emissions unit.



c. Emission Limitation:

Particulate matter (PM) emissions and particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.01 pound per hour and 0.02 ton per year (TPY).

Applicable Compliance Method:

The hourly and annual emission limitations are based upon the emissions unit's potential to emit. Potential PM-PM10 emissions were determined based on the following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$PM-PM10 = (3333 \text{ pounds of ink produced per hour maximum production}) \times (22\% \text{ by weight of ink is pigment}) \times (2 \text{ pounds of particulate per ton of pigment in ink produced emissions factor}) \times (1 - 98\% \text{ control efficiency of scrubber}) / (2000 \text{ pounds per ton}).$

$PM-PM10 = (8,400,000 \text{ pounds of ink produced per year maximum production}) \times (22\% \text{ by weight of ink is pigment}) \times (2 \text{ pounds of particulate per ton of pigment in ink produced emissions factor}) \times (1 - 98\% \text{ control efficiency of scrubber}) / (2000 \text{ pounds per ton}) / (2000 \text{ pounds per ton}).$

- (2) Compliance with the visible emission limitation shall be based on visible particulate emissions testing per OAC rule 3745-17-03(B)(1), (USEPA Method 9, 40 CFR 60, Appendix A).
- (3) Compliance with the percent by weight OC content limit in b)(2)c. shall be determined by the record keeping requirements as specified in d)(1).
- (4) Compliance with the ink production limitation in c)(1) shall be determined by the record keeping requirements as specified in d)(1).

g) Miscellaneous Requirements

- (1) The terms and conditions of this federally enforceable permit to install and operate supersede the terms and conditions of permit to install 14-05415, as issued on August 21, 2003, for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, and P037.



10. P014, Black Packout System T-136

Operations, Property and/or Equipment Description:

Black Packout System T-136

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. d)(2).

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

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)	Organic compound (OC) emissions shall not exceed 2.70 pounds per hour and 64.80 pounds per day. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V	See b)(2)a., b)(2)c., c)(1), and Sections B.2., B.3., B.4., and B.5.

(2) Additional Terms and Conditions

a. The maximum OC content for the inks produced in this emissions unit shall not exceed 4 percent by weight.

b. The hourly and daily emission limitations for OC outlined above are based on the emissions unit's potential to emit (PTE) taking into consideration the batch type nature of the operation. Therefore, no daily records are required to demonstrate compliance with these limits.



- c. The combined annual organic compound (OC) emissions from emissions units P014 and P015 shall not exceed 5.40 tons per year (TPY), based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with this emission limitation upon permit issuance.

- d. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the production limitation, OC content limitation, and the HAP and OC emissions limitations.

c) Operational Restrictions

- (1) The maximum annual ink production rate for emissions units P014 and P015 shall not exceed 18,000,000 pounds, based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with this production limitation upon permit issuance.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for emissions units P014 and P015, combined:

- a. The name and identification of each batch of ink produced;
- b. The OC content for each ink produced, in percent by weight;
- c. The amount of each ink produced, in pounds;
- d. The rolling, 12-month summation of the ink production figures, in pounds;
- e. The OC emissions from each ink produced, in pounds or tons, calculated by multiplying the pounds of ink produced by an emission factor of 0.0006 lb OC/pound of ink produced (AP-42 Table 6.4-1; 5/83); and
- f. The rolling, 12-month summation of the total combined OC emissions from all inks produced, in pounds or tons.

- (2) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", 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 federally enforceable permit-to-install and operate (FEPTIO) 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 FEPTIO.

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:

the rolling, 12-month emission limitation for OC emissions specified in b)(2)c.;

the OC content limitation specified in b)(2)a.;

the rolling, 12-month production limitation specified in c)(1); and

the rolling, 12-month emission limitation for HAP emissions specified in Section B.2.

- 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).

- (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 b)(1) and b)(2) shall be determined in accordance with the following methods:

- a. Emission Limitation:

Organic compound (OC) emissions shall not exceed 2.70 pounds per hour and 64.80 pounds per day.

Applicable Compliance Method:

The hourly and daily emission limitations are based upon the emissions unit's potential to emit. Potential OC emissions were determined based on the



following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$OC = (4500 \text{ pounds of ink produced per hour maximum production}) \times (0.0006 \text{ pound of OC per pound of ink produced emissions factor}).$

$OC = (4500 \text{ pounds of ink produced per hour maximum production}) \times (0.0006 \text{ pound of OC per pound of ink produced emissions factor}) \times (24 \text{ hours per day maximum hours per day mixing}).$

b. Emission Limitation:

The combined annual organic compound (OC) emissions from emissions units P014 and P015 shall not exceed 5.40 tons per year (TPY), based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month OC emission limitation identified in b)(2)c. shall be demonstrated by the record keeping requirement identified in d)(1).

Actual OC emissions for emissions units P014 and P015 shall be determined based on the following equation from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$OC = \text{Sum of } [(pounds \text{ of ink produced} \times 0.0006 \text{ pound of OC per pound of ink produced emissions factor} / 2000 \text{ lbs per ton)] \text{ for each ink, and for each emissions unit.}$

- (2) Compliance with the percent by weight OC content limit in b)(2)a. shall be determined by the record keeping requirements as specified in d)(1).
- (3) Compliance with the ink production limitation in c)(1) shall be determined by the record keeping requirements as specified in d)(1).

g) Miscellaneous Requirements

- (1) The terms and conditions of this federally enforceable permit to install and operate supersede the terms and conditions of permit to install 14-05415, as issued on August 21, 2003, for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, and P037.



11. P015, Black Packout System T-137

Operations, Property and/or Equipment Description:

Black Packout System T-137

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. d)(2).

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

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)	Organic compound (OC) emissions shall not exceed 2.70 pounds per hour and 38.70 pounds per day. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V	See b)(2)a., b)(2)c., c)(1), and Sections B.2., B.3., B.4., and B.5.

(2) Additional Terms and Conditions

a. The maximum OC content for the inks produced in this emissions unit shall not exceed 4 percent by weight.

b. The hourly and daily emission limitations for OC outlined above are based on the emissions unit's potential to emit (PTE) taking into consideration the batch type nature of the operation. Therefore, no daily records are required to demonstrate compliance with these limits.



- c. The combined annual organic compound (OC) emissions from emissions units P014 and P015 shall not exceed 5.40 tons per year (TPY), based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with this emission limitation upon permit issuance.

- d. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the production limitation, OC content limitation, and the HAP and OC emissions limitations.

c) Operational Restrictions

- (1) The maximum annual ink production rate for emissions units P014 and P015 shall not exceed 18,000,000 pounds, based on a rolling, 12-month summation.
- (2) The permittee has existing records to demonstrate compliance with this production limitation upon permit issuance.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for emissions units P014 and P015, combined:
 - a. The name and identification of each batch of ink produced;
 - b. The OC content for each ink produced, in percent by weight;
 - c. The amount of each ink produced, in pounds;
 - d. The rolling, 12-month summation of the ink production figures, in pounds;
 - e. The OC emissions from each ink produced, in pounds or tons, calculated by multiplying the pounds of ink produced by an emission factor of 0.0006 lb OC/pound of ink produced (AP-42 Table 6.4-1; 5/83); and
 - f. The rolling, 12-month summation of the total combined OC emissions from all inks produced, in pounds or tons.

- (2) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", 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 federally enforceable permit-to-install and operate (FEPTIO) 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 FEPTIO.

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:

the rolling, 12-month emission limitation for OC emissions specified in b)(2)c.;

the OC content limitation specified in b)(2)a.;

the rolling, 12-month production limitation specified in c)(1); and

the rolling, 12-month emission limitation for HAP emissions specified in Section B.2.

- 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).

- (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 b)(1) and b)(2) shall be determined in accordance with the following methods:

- a. Emission Limitation:

Organic compound (OC) emissions shall not exceed 2.70 pounds per hour and 38.70 pounds per day.

Applicable Compliance Method:

The hourly and daily emission limitations are based upon the emissions unit's potential to emit. Potential OC emissions were determined based on the



following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$OC = (4500 \text{ pounds of ink produced per hour maximum production}) \times (0.0006 \text{ pound of OC per pound of ink produced emissions factor})$.

$OC = (4500 \text{ pounds of ink produced per hour maximum production}) \times (0.0006 \text{ pound of OC per pound of ink produced emissions factor}) \times (14.3 \text{ hours per day maximum hours per day mixing})$.

b. Emission Limitation:

The combined annual organic compound (OC) emissions from emissions units P014 and P015 shall not exceed 5.40 tons per year (TPY), based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month OC emission limitation identified in b)(2)c. shall be demonstrated by the record keeping requirement identified in d)(1).

Actual OC emissions for emissions units P014 and P015 shall be determined based on the following equation from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$OC = \text{Sum of } [(pounds \text{ of ink produced} \times 0.0006 \text{ pound of OC per pound of ink produced emissions factor} / 2000 \text{ lbs per ton)] \text{ for each ink, and for each emissions unit.}$

- (2) Compliance with the percent by weight OC content limit in b)(2)a. shall be determined by the record keeping requirements as specified in d)(1).
- (3) Compliance with the ink production limitation in c)(1) shall be determined by the record keeping requirements as specified in d)(1).

g) Miscellaneous Requirements

- (1) The terms and conditions of this federally enforceable permit to install and operate supersede the terms and conditions of permit to install 14-05415, as issued on August 21, 2003, for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, and P037.



12. P016, Poly Premix Tank T-144 with Mixer

Operations, Property and/or Equipment Description:

Poly Premix Tank T-144 with Mixer

- 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. d)(2).
 - (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)(2)b., b)(2)d., c)(1), d)(1), e)(1), f)(1)b., f)(3), and f)(4).
- 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)	Organic compound (OC) emissions shall not exceed 0.98 pound per hour and 21.60 pounds per day. Particulate matter (PM) emissions and particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.01 pound per hour and 0.01 ton per year (TPY). The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-17-07(A)(1).
b.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V	See b)(2)b., b)(2)d., c)(1), and Sections B.2., B.3., B.4., and B.5.
c.	OAC rule 3745-17-11	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.	OAC rule 3745-17-07(A)(1)	See b)(2)a.



(2) Additional Terms and Conditions

- a. Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
- b. The maximum OC content for the inks produced in this emissions unit shall not exceed 20 percent by weight.
- c. The hourly and daily emission limitations for OC and the hourly and annual emission limitations for PM-PM10 outlined above are based on the emissions unit's potential to emit (PTE) taking into consideration the batch type nature of the operation. Therefore, no daily records are required to demonstrate compliance with these limits.
- d. The combined annual organic compound (OC) emissions from emissions units P016, P017, P018, P019, P020, and P021, combined, shall not exceed 7.50 tons per year (TPY), based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with this emission limitation upon permit issuance.
- e. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the production limitation, OC content limitation, the use of a scrubber for particulate control, and the HAP, OC and PM/PM10 emissions limitations.

c) Operational Restrictions

- (1) The maximum annual ink production rate for emissions units P016, P017, P018, P019, P020, and P021 shall not exceed 5,000,000 pounds, based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with this production limitation upon permit issuance.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for emissions units P016, P017, P018, P019, P020, and P021, combined:
 - a. The name and identification of each batch of ink produced;
 - b. The OC content for each ink produced, in percent by weight;
 - c. The amount of each ink produced, in pounds;
 - d. The rolling, 12-month summation of the ink production figures, in pounds;
 - e. The OC emissions from each ink produced, in pounds or tons, calculated by multiplying the pounds of ink produced by an emission factor of 0.003 lb OC/pound of ink produced (AP-42 Table 6.4-1; 5/83);



- f. The rolling, 12-month summation of the total combined OC emissions from all inks produced, in pounds or tons;
 - g. The amount of pigments (non-volatiles/solids) employed in tons; and
 - h. The PM-PM10 emissions, in pounds or tons, calculated by multiplying the tons of pigments (non-volatiles/solids) employed by an emission factor of 2 pounds PM-PM10/ton pigment (AP-42 Table 6.7-1; 5/83) and by a scrubber control efficiency of (1-.98).
- (2) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", 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 federally enforceable permit-to-install and operate (FEPTIO) 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 FEPTIO.
- 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:
 - the rolling, 12-month emission limitation for OC emissions specified in b)(2)d.;
 - the OC content limitation specified in b)(2)b.;
 - the rolling, 12-month production limitation specified in c)(1); and
 - the rolling, 12-month emission limitation for HAP emissions specified in Section B.2.
 - 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).

- (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 b)(1) and b)(2) shall be determined in accordance with the following methods:

a. Emission Limitation:

Organic compound (OC) emissions shall not exceed 0.98 pound per hour and 21.60 pounds per day.

Applicable Compliance Method:

The hourly and daily emission limitations are based upon the emissions unit's potential to emit. Potential OC emissions were determined based on the following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$OC = (327 \text{ pounds of ink produced per hour maximum production}) \times (0.003 \text{ pound of OC per pound of ink produced emissions factor}).$

$OC = (327 \text{ pounds of ink produced per hour maximum production}) \times (0.003 \text{ pound of OC per pound of ink produced emissions factor}) \times (22.0 \text{ hours per day maximum hours per day mixing}).$

b. Emission Limitation:

The combined annual organic compound (OC) emissions from emissions units P016, P017, P018, P019, P020, and P021, combined, shall not exceed 7.50 tons per year (TPY), based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month OC emission limitation identified in b)(2)d. shall be demonstrated by the record keeping requirement identified in d)(1).

Actual OC emissions for emissions units P016, P017, P018, P019, P020, and P021 shall be determined based on the following equation from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$OC = \text{Sum of } [(pounds \text{ of ink produced} \times 0.003 \text{ pound of OC per pound of ink produced emissions factor} / 2000 \text{ lbs per ton})]$ for each ink, and for each emissions unit.



c. Emission Limitation:

Particulate matter (PM) emissions and particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.01 pound per hour and 0.01 ton per year (TPY).

Applicable Compliance Method:

The hourly and annual emission limitations are based upon the emissions unit's potential to emit. Potential PM-PM10 emissions were determined based on the following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$$\text{PM-PM10} = (327 \text{ pounds of ink produced per hour maximum production}) \times (20\% \text{ by weight of ink is pigment}) \times (2 \text{ pounds of particulate per ton of pigment in ink produced emissions factor}) \times (1 - 98\% \text{ control efficiency of scrubber}) / (2000 \text{ pounds per ton}).$$

$$\text{PM-PM10} = (1,100,000 \text{ pounds of ink produced per year maximum production}) \times (20\% \text{ by weight of ink is pigment}) \times (2 \text{ pounds of particulate per ton of pigment in ink produced emissions factor}) \times (1 - 98\% \text{ control efficiency of scrubber}) / (2000 \text{ pounds per ton}) / (2000 \text{ pounds per ton}).$$

- (2) Compliance with the visible emission limitation shall be based on visible particulate emissions testing per OAC rule 3745-17-03(B)(1), (USEPA Method 9, 40 CFR 60, Appendix A).
- (3) Compliance with the percent by weight OC content limit in b)(2)b. shall be determined by the record keeping requirements as specified in d)(1).
- (4) Compliance with the ink production limitation in c)(1) shall be determined by the record keeping requirements as specified in d)(1).

g) Miscellaneous Requirements

- (1) The terms and conditions of this federally enforceable permit to install and operate supersede the terms and conditions of permit to install 14-05415, as issued on August 21, 2003, for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, and P037.



13. P019, Poly Shot Mill M-115 & Letdown Mixer

Operations, Property and/or Equipment Description:

Poly Shot Mill M-115 and Letdown Mixer

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. d)(2).

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

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)	Organic compound (OC) emissions shall not exceed 0.98 pound per hour and 21.60 pounds per day. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V	See b)(2)a., b)(2)c., c)(1), and Sections B.2., B.3., B.4., and B.5.

(2) Additional Terms and Conditions

a. The maximum OC content for the inks produced in this emissions unit shall not exceed 20 percent by weight.

b. The hourly and daily emission limitations for OC outlined above are based on the emissions unit's potential to emit (PTE) taking into consideration the batch type nature of the operation. Therefore, no daily records are required to demonstrate compliance with these limits.



- c. The combined annual organic compound (OC) emissions from emissions units P016, P017, P018, P019, P020, and P021, combined, shall not exceed 7.50 tons per year (TPY), based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with this emission limitation upon permit issuance.

- d. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the production limitation, OC content limitation, and the HAP and OC emissions limitations.

c) Operational Restrictions

- (1) The maximum annual ink production rate for emissions units P016, P017, P018, P019, P020, and P021 shall not exceed 5,000,000 pounds, based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with this production limitation upon permit issuance.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for emissions units P016, P017, P018, P019, P020, and P021, combined:

- a. The name and identification of each batch of ink produced;
- b. The OC content for each ink produced, in percent by weight;
- c. The amount of each ink produced, in pounds;
- d. The rolling, 12-month summation of the ink production figures, in pounds;
- e. The OC emissions from each ink produced, in pounds or tons, calculated by multiplying the pounds of ink produced by an emission factor of 0.003 lb OC/pound of ink produced (AP-42 Table 6.4-1; 5/83); and
- f. The rolling, 12-month summation of the total combined OC emissions from all inks produced, in pounds or tons.

- (2) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", 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 federally enforceable permit-to-install and operate (FEPTIO) 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 FEPTIO.

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:

the rolling, 12-month emission limitation for OC emissions specified in b)(2)c.;

the OC content limitation specified in b)(2)a.;

the rolling, 12-month production limitation specified in c)(1); and

the rolling, 12-month emission limitation for HAP emissions specified in Section B.2.

- 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).

- (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 b)(1) and b)(2) shall be determined in accordance with the following methods:

- a. Emission Limitation:

Organic compound (OC) emissions shall not exceed 0.98 pound per hour and 21.60 pounds per day.

Applicable Compliance Method:

The hourly and daily emission limitations are based upon the emissions unit's potential to emit. Potential OC emissions were determined based on the



following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$$OC = (327 \text{ pounds of ink produced per hour maximum production}) \times (0.003 \text{ pound of OC per pound of ink produced emissions factor}).$$

$$OC = (327 \text{ pounds of ink produced per hour maximum production}) \times (0.003 \text{ pound of OC per pound of ink produced emissions factor}) \times (22.0 \text{ hours per day maximum hours per day mixing}).$$

b. Emission Limitation:

The combined annual organic compound (OC) emissions from emissions units P016, P017, P018, P019, P020, and P021, combined, shall not exceed 7.50 tons per year (TPY), based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month OC emission limitation identified in b)(2)c. shall be demonstrated by the record keeping requirement identified in d)(1).

Actual OC emissions for emissions units P016, P017, P018, P019, P020, and P021 shall be determined based on the following equation from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$$OC = \text{Sum of } [(pounds \text{ of ink produced} \times 0.003 \text{ pound of OC per pound of ink produced emissions factor} / 2000 \text{ lbs per ton)] \text{ for each ink, and for each emissions unit.}$$

- (2) Compliance with the percent by weight OC content limit in b)(2)a. shall be determined by the record keeping requirements as specified in d)(1).
- (3) Compliance with the ink production limitation in c)(1) shall be determined by the record keeping requirements as specified in d)(1).

g) Miscellaneous Requirements

- (1) The terms and conditions of this federally enforceable permit to install and operate supersede the terms and conditions of permit to install 14-05415, as issued on August 21, 2003, for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, and P037.



14. P022, Newtrol Premix Tank T-131 with Mixer

Operations, Property and/or Equipment Description:

Newtrol Premix Tank T-131 with Mixer

- 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. d)(2).
 - (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)(2)b., b)(2)d., c)(1), d)(1), e)(1), f)(1)b., f)(3), and f)(4).
- 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)	Organic compound (OC) emissions shall not exceed 0.25 pound per hour and 4.22 pounds per day. Particulate matter (PM) emissions and particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.01 pound per hour and 0.01 ton per year (TPY). The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-17-07(A)(1).
b.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V	See b)(2)b., b)(2)d., c)(1), and Sections B.2., B.3., B.4., and B.5.
c.	OAC rule 3745-17-11	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.	OAC rule 3745-17-07(A)(1)	See b)(2)a.



(2) Additional Terms and Conditions

- a. Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
- b. The maximum OC content for the inks produced in this emissions unit shall not exceed 4 percent by weight.
- c. The hourly and daily emission limitations for OC and the hourly and annual emission limitations for PM-PM10 outlined above are based on the emissions unit's potential to emit (PTE) taking into consideration the batch type nature of the operation. Therefore, no daily records are required to demonstrate compliance with these limits.
- d. The combined annual organic compound (OC) emissions from emissions units P022, P023, P024, and P025, combined, shall not exceed 1.50 tons per year (TPY), based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with this emission limitation upon permit issuance.

- e. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the production limitation, OC content limitation, the use of a scrubber for particulate control, and the HAP, OC and PM/PM10 emissions limitations.

c) Operational Restrictions

- (1) The maximum annual ink production rate for emissions units P022, P023, P024, and P025 shall not exceed 5,000,000 pounds, based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with this production limitation upon permit issuance.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for emissions units P022, P023, P024, and P025, combined:

- a. The name and identification of each batch of ink produced;
- b. The OC content for each ink produced, in percent by weight;
- c. The amount of each ink produced, in pounds;
- d. The rolling, 12-month summation of the ink production figures, in pounds;
- e. The OC emissions from each ink produced, in pounds or tons, calculated by multiplying the pounds of ink produced by an emission factor of 0.0006 lb OC/pound of ink produced (AP-42 Table 6.4-1; 5/83);



- f. The rolling, 12-month summation of the total combined OC emissions from all inks produced, in pounds or tons;
 - g. The amount of pigments (non-volatiles/solids) employed in tons; and
 - h. The PM-PM10 emissions, in pounds or tons, calculated by multiplying the tons of pigments (non-volatiles/solids) employed by an emission factor of 2 pounds PM-PM10/ton pigment (AP-42 Table 6.7-1; 5/83) and by a scrubber control efficiency of (1-.98).
- (2) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", 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 federally enforceable permit-to-install and operate (FEPTIO) 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 FEPTIO.
- 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:
 - the rolling, 12-month emission limitation for OC emissions specified in b)(2)d.;
 - the OC content limitation specified in b)(2)b.;
 - the rolling, 12-month production limitation specified in c)(1); and
 - the rolling, 12-month emission limitation for HAP emissions specified in Section B.2.
 - 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).

- (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 b)(1) and b)(2) shall be determined in accordance with the following methods:

a. Emission Limitation:

Organic compound (OC) emissions shall not exceed 0.25 pound per hour and 4.22 pounds per day.

Applicable Compliance Method:

The hourly and daily emission limitations are based upon the emissions unit's potential to emit. Potential OC emissions were determined based on the following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

OC = (410 pounds of ink produced per hour maximum production) x (0.0006 pound of OC per pound of ink produced emissions factor).

OC = (410 pounds of ink produced per hour maximum production) x (0.0006 pound of OC per pound of ink produced emissions factor) x (17.1 hours per day maximum hours per day mixing).

b. Emission Limitation:

The combined annual organic compound (OC) emissions from emissions units P022, P023, P024, and P025, combined, shall not exceed 1.50 tons per year (TPY), based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month OC emission limitation identified in b)(2)d. shall be demonstrated by the record keeping requirement identified in d)(1).

Actual OC emissions for emissions units P022, P023, P024, and P025 shall be determined based on the following equation from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

OC = Sum of [(pounds of ink produced x 0.0006 pound of OC per pound of ink produced emissions factor / 2000 lbs per ton)] for each ink, and for each emissions unit.



c. Emission Limitation:

Particulate matter (PM) emissions and particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.01 pound per hour and 0.01 ton per year (TPY).

Applicable Compliance Method:

The hourly and annual emission limitations are based upon the emissions unit's potential to emit. Potential PM-PM10 emissions were determined based on the following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

PM-PM10 = (410 pounds of ink produced per hour maximum production) x (50% by weight of ink is pigment) x (2 pounds of particulate per ton of pigment in ink produced emissions factor) x (1 – 98% control efficiency of scrubber) / (2000 pounds per ton).

PM-PM10 = (1,900,000 pounds of ink produced per year maximum production) x (50% by weight of ink is pigment) x (2 pounds of particulate per ton of pigment in ink produced emissions factor) x (1 – 98% control efficiency of scrubber) / (2000 pounds per ton) / (2000 pounds per ton).

- (2) Compliance with the visible emission limitation shall be based on visible particulate emissions testing per OAC rule 3745-17-03(B)(1), (USEPA Method 9, 40 CFR 60, Appendix A).
- (3) Compliance with the percent by weight OC content limit in b)(2)b. shall be determined by the record keeping requirements as specified in d)(1).
- (4) Compliance with the ink production limitation in c)(1) shall be determined by the record keeping requirements as specified in d)(1).

g) Miscellaneous Requirements

- (1) The terms and conditions of this federally enforceable permit to install and operate supersede the terms and conditions of permit to install 14-05415, as issued on August 21, 2003, for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, and P037.



15. P023, Newtrol Premix Tank T-104 with Mixer

Operations, Property and/or Equipment Description:

Newtrol Premix Tank T-104 with Mixer

- 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. d)(2).
 - (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)(2)b., b)(2)d., c)(1), d)(1), e)(1), f)(1)b., f)(3), and f)(4).
- 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)	Organic compound (OC) emissions shall not exceed 0.12 pound per hour and 2.47 pounds per day. Particulate matter (PM) emissions and particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.01 pound per hour and 0.01 ton per year (TPY). The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-17-07(A)(1).
b.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V	See b)(2)b., b)(2)d., c)(1), and Sections B.2., B.3., B.4., and B.5.
c.	OAC rule 3745-17-11	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.	OAC rule 3745-17-07(A)(1)	See b)(2)a.



(2) Additional Terms and Conditions

- a. Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
- b. The maximum OC content for the inks produced in this emissions unit shall not exceed 4 percent by weight.
- c. The hourly and daily emission limitations for OC and the hourly and annual emission limitations for PM-PM10 outlined above are based on the emissions unit's potential to emit (PTE) taking into consideration the batch type nature of the operation. Therefore, no daily records are required to demonstrate compliance with these limits.
- d. The combined annual organic compound (OC) emissions from emissions units P022, P023, P024, and P025, combined, shall not exceed 1.50 tons per year (TPY), based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with this emission limitation upon permit issuance.

- e. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the production limitation, OC content limitation, the use of a scrubber for particulate control, and the HAP, OC and PM/PM10 emissions limitations.

c) Operational Restrictions

- (1) The maximum annual ink production rate for emissions units P022, P023, P024, and P025 shall not exceed 5,000,000 pounds, based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with this production limitation upon permit issuance.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for emissions units P022, P023, P024, and P025, combined:
 - a. The name and identification of each batch of ink produced;
 - b. The OC content for each ink produced, in percent by weight;
 - c. The amount of each ink produced, in pounds;
 - d. The rolling, 12-month summation of the ink production figures, in pounds;
 - e. The OC emissions from each ink produced, in pounds or tons, calculated by multiplying the pounds of ink produced by an emission factor of 0.0006 lb OC/pound of ink produced (AP-42 Table 6.4-1; 5/83);



- f. The rolling, 12-month summation of the total combined OC emissions from all inks produced, in pounds or tons;
- g. The amount of pigments (non-volatiles/solids) employed in tons; and
- h. The PM-PM10 emissions, in pounds or tons, calculated by multiplying the tons of pigments (non-volatiles/solids) employed by an emission factor of 2 pounds PM-PM10/ton pigment (AP-42 Table 6.7-1; 5/83) and by a scrubber control efficiency of (1-.98).

(2) Modeling to demonstrate compliance with, the “Toxic Air Contaminant Statute”, 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 federally enforceable permit-to-install and operate (FEPTIO) 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 FEPTIO.

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:
 - the rolling, 12-month emission limitation for OC emissions specified in b)(2)d.;
 - the OC content limitation specified in b)(2)b.;
 - the rolling, 12-month production limitation specified in c)(1); and
 - the rolling, 12-month emission limitation for HAP emissions specified in Section B.2.
 - 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).

- (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 b)(1) and b)(2) shall be determined in accordance with the following methods:

a. Emission Limitation:

Organic compound (OC) emissions shall not exceed 0.12 pound per hour and 2.47 pounds per day.

Applicable Compliance Method:

The hourly and daily emission limitations are based upon the emissions unit's potential to emit. Potential OC emissions were determined based on the following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$OC = (200 \text{ pounds of ink produced per hour maximum production}) \times (0.0006 \text{ pound of OC per pound of ink produced emissions factor}).$

$OC = (200 \text{ pounds of ink produced per hour maximum production}) \times (0.0006 \text{ pound of OC per pound of ink produced emissions factor}) \times (20.6 \text{ hours per day maximum hours per day mixing}).$

b. Emission Limitation:

The combined annual organic compound (OC) emissions from emissions units P022, P023, P024, and P025, combined, shall not exceed 1.50 tons per year (TPY), based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month OC emission limitation identified in b)(2)d. shall be demonstrated by the record keeping requirement identified in d)(1).

Actual OC emissions for emissions units P022, P023, P024, and P025 shall be determined based on the following equation from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$OC = \text{Sum of } [(pounds \text{ of ink produced} \times 0.0006 \text{ pound of OC per pound of ink produced emissions factor} / 2000 \text{ lbs per ton})]$ for each ink, and for each emissions unit.



c. Emission Limitation:

Particulate matter (PM) emissions and particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.01 pound per hour and 0.01 ton per year (TPY).

Applicable Compliance Method:

The hourly and annual emission limitations are based upon the emissions unit's potential to emit. Potential PM-PM10 emissions were determined based on the following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$$\text{PM-PM10} = (\text{200 pounds of ink produced per hour maximum production}) \times (\text{50\% by weight of ink is pigment}) \times (\text{2 pounds of particulate per ton of pigment in ink produced emissions factor}) \times (\text{1} - \text{98\% control efficiency of scrubber}) / (\text{2000 pounds per ton}).$$

$$\text{PM-PM10} = (\text{600,000 pounds of ink produced per year maximum production}) \times (\text{50\% by weight of ink is pigment}) \times (\text{2 pounds of particulate per ton of pigment in ink produced emissions factor}) \times (\text{1} - \text{98\% control efficiency of scrubber}) / (\text{2000 pounds per ton}) / (\text{2000 pounds per ton}).$$

- (2) Compliance with the visible emission limitation shall be based on visible particulate emissions testing per OAC rule 3745-17-03(B)(1), (USEPA Method 9, 40 CFR 60, Appendix A).
- (3) Compliance with the percent by weight OC content limit in b)(2)b. shall be determined by the record keeping requirements as specified in d)(1).
- (4) Compliance with the ink production limitation in c)(1) shall be determined by the record keeping requirements as specified in d)(1).

g) Miscellaneous Requirements

- (1) The terms and conditions of this federally enforceable permit to install and operate supersede the terms and conditions of permit to install 14-05415, as issued on August 21, 2003, for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, and P037.



16. P024, Newtrol Shot Mill M-102 & Letdown Mixer

Operations, Property and/or Equipment Description:

Newtrol Shot Mill M-102 and Letdown Mixer

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. d)(2).

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

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)	Organic compound (OC) emissions shall not exceed 0.19 pound per hour and 4.22 pounds per day. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V	See b)(2)a., b)(2)c., c)(1), and Sections B.2., B.3., B.4., and B.5.

(2) Additional Terms and Conditions

a. The maximum OC content for the inks produced in this emissions unit shall not exceed 4 percent by weight.

b. The hourly and daily emission limitations for OC outlined above are based on the emissions unit's potential to emit (PTE) taking into consideration the batch type nature of the operation. Therefore, no daily records are required to demonstrate compliance with these limits.



- c. The combined annual organic compound (OC) emissions from emissions units P022, P023, P024, and P025, combined, shall not exceed 1.50 tons per year (TPY), based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with this emission limitation upon permit issuance.

- d. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the production limitation, OC content limitation, and the HAP and OC emissions limitations.

c) Operational Restrictions

- (1) The maximum annual ink production rate for emissions units P022, P023, P024, and P025 shall not exceed 5,000,000 pounds, based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with this production limitation upon permit issuance.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for emissions units P022, P023, P024, and P025, combined:

- a. The name and identification of each batch of ink produced;
- b. The OC content for each ink produced, in percent by weight;
- c. The amount of each ink produced, in pounds;
- d. The rolling, 12-month summation of the ink production figures, in pounds;
- e. The OC emissions from each ink produced, in pounds or tons, calculated by multiplying the pounds of ink produced by an emission factor of 0.0006 lb OC/pound of ink produced (AP-42 Table 6.4-1; 5/83); and
- f. The rolling, 12-month summation of the total combined OC emissions from all inks produced, in pounds or tons.

- (2) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", 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 federally enforceable permit-to-install and operate (FEPTIO) 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 FEPTIO.

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:

the rolling, 12-month emission limitation for OC emissions specified in b)(2)c.;

the OC content limitation specified in b)(2)a.;

the rolling, 12-month production limitation specified in c)(1); and

the rolling, 12-month emission limitation for HAP emissions specified in Section B.2.

- 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).

- (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 b)(1) and b)(2) shall be determined in accordance with the following methods:

- a. Emission Limitation:

Organic compound (OC) emissions shall not exceed 0.19 pound per hour and 4.22 pounds per day.

Applicable Compliance Method:

The hourly and daily emission limitations are based upon the emissions unit's potential to emit. Potential OC emissions were determined based on the



following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$$OC = (315 \text{ pounds of ink produced per hour maximum production}) \times (0.0006 \text{ pound of OC per pound of ink produced emissions factor}).$$

$$OC = (315 \text{ pounds of ink produced per hour maximum production}) \times (0.0006 \text{ pound of OC per pound of ink produced emissions factor}) \times (22.3 \text{ hours per day maximum hours per day mixing}).$$

b. Emission Limitation:

The combined annual organic compound (OC) emissions from emissions units P022, P023, P024, and P025, combined, shall not exceed 1.50 tons per year (TPY), based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month OC emission limitation identified in b)(2)c. shall be demonstrated by the record keeping requirement identified in d)(1).

Actual OC emissions for emissions units P022, P023, P024, and P025 shall be determined based on the following equation from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$$OC = \text{Sum of } [(pounds \text{ of ink produced} \times 0.0006 \text{ pound of OC per pound of ink produced emissions factor} / 2000 \text{ lbs per ton)] \text{ for each ink, and for each emissions unit.}$$

- (2) Compliance with the percent by weight OC content limit in b)(2)a. shall be determined by the record keeping requirements as specified in d)(1).
- (3) Compliance with the ink production limitation in c)(1) shall be determined by the record keeping requirements as specified in d)(1).

g) Miscellaneous Requirements

- (1) The terms and conditions of this federally enforceable permit to install and operate supersede the terms and conditions of permit to install 14-05415, as issued on August 21, 2003, for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, and P037.



17. P025, Newtrol Shot Mill M-103 & Letdown Mixer

Operations, Property and/or Equipment Description:

Newtrol Shot Mill M-103 and Letdown Mixer

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. d)(2).

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

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)	Organic compound (OC) emissions shall not exceed 0.12 pound per hour and 2.47 pounds per day. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V	See b)(2)a., b)(2)c., c)(1), and Sections B.2., B.3., B.4., and B.5.

(2) Additional Terms and Conditions

a. The maximum OC content for the inks produced in this emissions unit shall not exceed 4 percent by weight.

b. The hourly and daily emission limitations for OC outlined above are based on the emissions unit's potential to emit (PTE) taking into consideration the batch type nature of the operation. Therefore, no daily records are required to demonstrate compliance with these limits.



- c. The combined annual organic compound (OC) emissions from emissions units P022, P023, P024, and P025, combined, shall not exceed 1.50 tons per year (TPY), based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with this emission limitation upon permit issuance.

- d. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the production limitation, OC content limitation, and the HAP and OC emissions limitations.

c) Operational Restrictions

- (1) The maximum annual ink production rate for emissions units P022, P023, P024, and P025 shall not exceed 5,000,000 pounds, based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with this production limitation upon permit issuance.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for emissions units P022, P023, P024, and P025, combined:

- a. The name and identification of each batch of ink produced;
- b. The OC content for each ink produced, in percent by weight;
- c. The amount of each ink produced, in pounds;
- d. The rolling, 12-month summation of the ink production figures, in pounds;
- e. The OC emissions from each ink produced, in pounds or tons, calculated by multiplying the pounds of ink produced by an emission factor of 0.0006 lb OC/pound of ink produced (AP-42 Table 6.4-1; 5/83); and
- f. The rolling, 12-month summation of the total combined OC emissions from all inks produced, in pounds or tons.

- (2) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", 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 federally enforceable permit-to-install and operate (FEPTIO) 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 FEPTIO.

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:

the rolling, 12-month emission limitation for OC emissions specified in b)(2)c.;

the OC content limitation specified in b)(2)a.;

the rolling, 12-month production limitation specified in c)(1); and

the rolling, 12-month emission limitation for HAP emissions specified in Section B.2.

- 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).

- (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 b)(1) and b)(2) shall be determined in accordance with the following methods:

- a. Emission Limitation:

Organic compound (OC) emissions shall not exceed 0.12 pound per hour and 2.47 pounds per day.

Applicable Compliance Method:

The hourly and daily emission limitations are based upon the emissions unit's potential to emit. Potential OC emissions were determined based on the



following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$$OC = (200 \text{ pounds of ink produced per hour maximum production}) \times (0.0006 \text{ pound of OC per pound of ink produced emissions factor}).$$

$$OC = (200 \text{ pounds of ink produced per hour maximum production}) \times (0.0006 \text{ pound of OC per pound of ink produced emissions factor}) \times (20.6 \text{ hours per day maximum hours per day mixing}).$$

b. Emission Limitation:

The combined annual organic compound (OC) emissions from emissions units P022, P023, P024, and P025, combined, shall not exceed 1.50 tons per year (TPY), based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month OC emission limitation identified in b)(2)c. shall be demonstrated by the record keeping requirement identified in d)(1).

Actual OC emissions for emissions units P022, P023, P024, and P025 shall be determined based on the following equation from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$$OC = \text{Sum of } [(pounds \text{ of ink produced} \times 0.0006 \text{ pound of OC per pound of ink produced emissions factor} / 2000 \text{ lbs per ton)] \text{ for each ink, and for each emissions unit.}$$

- (2) Compliance with the percent by weight OC content limit in b)(2)a. shall be determined by the record keeping requirements as specified in d)(1).
- (3) Compliance with the ink production limitation in c)(1) shall be determined by the record keeping requirements as specified in d)(1).

g) Miscellaneous Requirements

- (1) The terms and conditions of this federally enforceable permit to install and operate supersede the terms and conditions of permit to install 14-05415, as issued on August 21, 2003, for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, and P037.



18. P026, 40 inch Three Roll Mill M-109

Operations, Property and/or Equipment Description:

40 inch Three Roll Mill M-109

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. d)(2).

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

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)	Organic compound (OC) emissions shall not exceed 0.47 pound per hour and 10.00 pounds per day, excluding cleanup. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V	See b)(2)a., b)(2)c., c)(1), and Sections B.2., B.3., B.4., and B.5.

(2) Additional Terms and Conditions

a. The maximum OC content for the inks produced in this emissions unit shall not exceed 50 percent by weight.

b. The hourly and daily emission limitations for OC outlined above are based on the emissions unit's potential to emit (PTE) taking into consideration the batch type nature of the operation. Therefore, no daily records are required to demonstrate compliance with these limits.



- c. The combined annual organic compound (OC) emissions from emissions units P026 and P027, combined, shall not exceed 2.98 tons per year (TPY), including cleanup, based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with this emission limitation upon permit issuance.

- d. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the production limitation, OC content limitation, and the HAP and OC emissions limitations.

c) Operational Restrictions

- (1) The maximum annual ink production rate for emissions units P026 and P027 shall not exceed 400,000 pounds, based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with this production limitation upon permit issuance.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for emissions units P026 and P027, combined:

- a. The name and identification of each batch of ink produced;
- b. The OC content for each ink produced, in percent by weight;
- c. The amount of each ink produced, in pounds;
- d. The rolling, 12-month summation of the ink production figures, in pounds;
- e. The OC emissions from each ink produced, in pounds or tons, calculated by multiplying the pounds of ink produced by an emission factor of 0.0075 lb OC/pound of ink produced (AP-42 Table 6.4-1; 5/83);
- f. The name and identification of each cleanup material combined;
- g. The number of pounds of each cleanup material employed;
- h. The number of pounds of each cleanup material recovered for use as make-up solvent or reclaimed as waste for disposal;
- i. The OC emissions from all cleanup materials, in pounds or tons (g. – h.);
- j. The total OC emissions from all inks produced and cleanup materials employed, in pounds or tons (e. + i.); and
- k. The rolling, 12-month summation of the total combined OC emissions from all inks produced and cleanup materials employed, in pounds or tons.

- (2) Modeling to demonstrate compliance with, the “Toxic Air Contaminant Statute”, 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 federally enforceable permit-to-install and operate (FEPTIO) 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 FEPTIO.

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:

the rolling, 12-month emission limitation for OC emissions specified in b)(2)c.;

the OC content limitation specified in b)(2)a.;

the rolling, 12-month production limitation specified in c)(1); and

the rolling, 12-month emission limitation for HAP emissions specified in Section B.2.

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).

(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 b)(1) and b)(2) shall be determined in accordance with the following methods:

a. Emission Limitation:

Organic compound (OC) emissions shall not exceed 0.47 pound per hour and 10.00 pounds per day, excluding cleanup.

Applicable Compliance Method:

The hourly and daily emission limitations are based upon the emissions unit's potential to emit. Potential OC emissions were determined based on the following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$OC = (63 \text{ pounds of ink produced per hour maximum production}) \times (0.0075 \text{ pound of OC per pound of ink produced emissions factor}).$

$OC = (63 \text{ pounds of ink produced per hour maximum production}) \times (0.0075 \text{ pound of OC per pound of ink produced emissions factor}) \times (21.3 \text{ hours per day maximum hours per day mixing}).$

b. Emission Limitation:

The combined annual organic compound (OC) emissions from emissions units P026 and P027, combined, shall not exceed 2.98 tons per year (TPY), including cleanup, based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month OC emission limitation identified in b)(2)c. shall be demonstrated by the record keeping requirement identified in d)(1).

Actual OC emissions for emissions units P026 and P027 shall be determined based on the following equation from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$OC = \text{Sum of } [(pounds \text{ of ink produced} \times 0.0075 \text{ pound of OC per pound of ink produced emissions factor} / 2000 \text{ lbs per ton}) + (pounds \text{ of cleanup material employed} \times OC \text{ content of cleanup material in pounds of OC per pound of cleanup material} / 2000 \text{ lbs per ton})]$ for each ink, and for each emissions unit.

(2) Compliance with the percent by weight OC content limit in b)(2)a. shall be determined by the record keeping requirements as specified in d)(1).

(3) Compliance with the ink production limitation in c)(1) shall be determined by the record keeping requirements as specified in d)(1).



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0105384

Facility ID: 1409030956

Effective Date: To be entered upon final issuance

g) Miscellaneous Requirements

- (1) The terms and conditions of this federally enforceable permit to install and operate supersede the terms and conditions of permit to install 14-05415, as issued on August 21, 2003, for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, and P037.



19. P027, 32 inch Three Roll Mill No. 5

Operations, Property and/or Equipment Description:

32 inch Three Roll Mill No. 5

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. d)(2).

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

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)	Organic compound (OC) emissions shall not exceed 0.38 pound per hour and 8.00 pounds per day, excluding cleanup. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V	See b)(2)a., b)(2)c., c)(1), and Sections B.2., B.3., B.4., and B.5.

(2) Additional Terms and Conditions

a. The maximum OC content for the inks produced in this emissions unit shall not exceed 50 percent by weight.

b. The hourly and daily emission limitations for OC outlined above are based on the emissions unit's potential to emit (PTE) taking into consideration the batch type nature of the operation. Therefore, no daily records are required to demonstrate compliance with these limits.



- c. The combined annual organic compound (OC) emissions from emissions units P026 and P027, combined, shall not exceed 2.98 tons per year (TPY), including cleanup, based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with this emission limitation upon permit issuance.

- d. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the production limitation, OC content limitation, and the HAP and OC emissions limitations.

c) Operational Restrictions

- (1) The maximum annual ink production rate for emissions units P026 and P027 shall not exceed 400,000 pounds, based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with this production limitation upon permit issuance.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for emissions units P026 and P027, combined:

- a. The name and identification of each batch of ink produced;
- b. The OC content for each ink produced, in percent by weight;
- c. The amount of each ink produced, in pounds;
- d. The rolling, 12-month summation of the ink production figures, in pounds;
- e. The OC emissions from each ink produced, in pounds or tons, calculated by multiplying the pounds of ink produced by an emission factor of 0.0075 lb OC/pound of ink produced (AP-42 Table 6.4-1; 5/83);
- f. The name and identification of each cleanup material combined;
- g. The number of pounds of each cleanup material employed;
- h. The number of pounds of each cleanup material recovered for use as make-up solvent or reclaimed as waste for disposal;
- i. The OC emissions from all cleanup materials, in pounds or tons (g. – h.);
- j. The total OC emissions from all inks produced and cleanup materials employed, in pounds or tons (e. + i.); and
- k. The rolling, 12-month summation of the total combined OC emissions from all inks produced and cleanup materials employed, in pounds or tons.

- (2) Modeling to demonstrate compliance with, the “Toxic Air Contaminant Statute”, 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 federally enforceable permit-to-install and operate (FEPTIO) 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 FEPTIO.

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:

the rolling, 12-month emission limitation for OC emissions specified in b)(2)c.;

the OC content limitation specified in b)(2)a.;

the rolling, 12-month production limitation specified in c)(1); and

the rolling, 12-month emission limitation for HAP emissions specified in Section B.2.

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).

(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 b)(1) and b)(2) shall be determined in accordance with the following methods:

a. Emission Limitation:

Organic compound (OC) emissions shall not exceed 0.38 pound per hour and 8.00 pounds per day, excluding cleanup.

Applicable Compliance Method:

The hourly and daily emission limitations are based upon the emissions unit's potential to emit. Potential OC emissions were determined based on the following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$$OC = (50 \text{ pounds of ink produced per hour maximum production}) \times (0.0075 \text{ pound of OC per pound of ink produced emissions factor}).$$

$$OC = (50 \text{ pounds of ink produced per hour maximum production}) \times (0.0075 \text{ pound of OC per pound of ink produced emissions factor}) \times (21.3 \text{ hours per day maximum hours per day mixing}).$$

b. Emission Limitation:

The combined annual organic compound (OC) emissions from emissions units P026 and P027, combined, shall not exceed 2.98 tons per year (TPY), including cleanup, based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month OC emission limitation identified in b)(2)c. shall be demonstrated by the record keeping requirement identified in d)(1).

Actual OC emissions for emissions units P026 and P027 shall be determined based on the following equation from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$$OC = \text{Sum of } [(pounds \text{ of ink produced} \times 0.0075 \text{ pound of OC per pound of ink produced emissions factor} / 2000 \text{ lbs per ton}) + (pounds \text{ of cleanup material employed} \times \text{OC content of cleanup material in pounds of OC per pound of cleanup material} / 2000 \text{ lbs per ton})] \text{ for each ink, and for each emissions unit.}$$

(2) Compliance with the percent by weight OC content limit in b)(2)a. shall be determined by the record keeping requirements as specified in d)(1).

(3) Compliance with the ink production limitation in c)(1) shall be determined by the record keeping requirements as specified in d)(1).



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0105384

Facility ID: 1409030956

Effective Date: To be entered upon final issuance

g) Miscellaneous Requirements

- (1) The terms and conditions of this federally enforceable permit to install and operate supersede the terms and conditions of permit to install 14-05415, as issued on August 21, 2003, for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, and P037.



20. P028, FSH Mixer MX-106

Operations, Property and/or Equipment Description:

FSH Mixer MX-106

- 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. d)(2).
 - (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)(2)b., b)(2)d., c)(1), d)(1), e)(1), f)(1)b., f)(3), and f)(4).
- 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)	Organic compound (OC) emissions shall not exceed 1.50 pounds per hour and 25.71 pounds per day. Particulate matter (PM) emissions and particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.01 pound per hour and 0.01 ton per year (TPY). The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-17-07(A)(1).
b.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V	See b)(2)b., b)(2)d., c)(1), and Sections B.2., B.3., B.4., and B.5.
c.	OAC rule 3745-17-11	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.	OAC rule 3745-17-07(A)(1)	See b)(2)a.



(2) Additional Terms and Conditions

- a. Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
- b. The maximum OC content for the inks produced in this emissions unit shall not exceed 50 percent by weight.
- c. The hourly and daily emission limitations for OC and the hourly and annual emission limitations for PM-PM10 outlined above are based on the emissions unit's potential to emit (PTE) taking into consideration the batch type nature of the operation. Therefore, no daily records are required to demonstrate compliance with these limits.
- d. The combined annual organic compound (OC) emissions from emissions units P028, P029, P030, and P031, combined, shall not exceed 2.25 tons per year (TPY), based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with this emission limitation upon permit issuance.

- e. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the production limitation, OC content limitation, the use of a scrubber for particulate control, and the HAP, OC and PM/PM10 emissions limitations.

c) Operational Restrictions

- (1) The maximum annual ink production rate for emissions units P028, P029, P030, and P031 shall not exceed 600,000 pounds, based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with this production limitation upon permit issuance.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for emissions units P028, P029, P030, and P031, combined:
 - a. The name and identification of each batch of ink produced;
 - b. The OC content for each ink produced, in percent by weight;
 - c. The amount of each ink produced, in pounds;
 - d. The rolling, 12-month summation of the ink production figures, in pounds;
 - e. The OC emissions from each ink produced, in pounds or tons, calculated by multiplying the pounds of ink produced by an emission factor of 0.0075 lb OC/pound of ink produced (AP-42 Table 6.4-1; 5/83);



- f. The rolling, 12-month summation of the total combined OC emissions from all inks produced, in pounds or tons;
 - g. The amount of pigments (non-volatiles/solids) employed in tons; and
 - h. The PM-PM10 emissions, in pounds or tons, calculated by multiplying the tons of pigments (non-volatiles/solids) employed by an emission factor of 2 pounds PM-PM10/ton pigment (AP-42 Table 6.7-1; 5/83) and by a scrubber control efficiency of (1-.98).
- (2) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", 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 federally enforceable permit-to-install and operate (FEPTIO) 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 FEPTIO.
- 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:
 - the rolling, 12-month emission limitation for OC emissions specified in b)(2)d.;
 - the OC content limitation specified in b)(2)b.;
 - the rolling, 12-month production limitation specified in c)(1); and
 - the rolling, 12-month emission limitation for HAP emissions specified in Section B.2.
 - 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).

- (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 b)(1) and b)(2) shall be determined in accordance with the following methods:

a. Emission Limitation:

Organic compound (OC) emissions shall not exceed 1.50 pounds per hour and 25.71 pounds per day.

Applicable Compliance Method:

The hourly and daily emission limitations are based upon the emissions unit's potential to emit. Potential OC emissions were determined based on the following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

OC = (200 pounds of ink produced per hour maximum production) x (0.0075 pound of OC per pound of ink produced emissions factor).

OC = (200 pounds of ink produced per hour maximum production) x (0.0075 pound of OC per pound of ink produced emissions factor) x (17.1 hours per day maximum hours per day mixing).

b. Emission Limitation:

The combined annual organic compound (OC) emissions from emissions units P028, P029, P030, and P031, combined, shall not exceed 2.25 tons per year (TPY), based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month OC emission limitation identified in b)(2)d. shall be demonstrated by the record keeping requirement identified in d)(1).

Actual OC emissions for emissions units P028, P029, P030, and P031 shall be determined based on the following equation from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

OC = Sum of [(pounds of ink produced x 0.0075 pound of OC per pound of ink produced emissions factor / 2000 lbs per ton)] for each ink, and for each emissions unit.



c. Emission Limitation:

Particulate matter (PM) emissions and particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.01 pound per hour and 0.01 ton per year (TPY).

Applicable Compliance Method:

The hourly and annual emission limitations are based upon the emissions unit's potential to emit. Potential PM-PM10 emissions were determined based on the following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$$\text{PM-PM10} = (\text{200 pounds of ink produced per hour maximum production}) \times (\text{30\% by weight of ink is pigment}) \times (\text{2 pounds of particulate per ton of pigment in ink produced emissions factor}) \times (\text{1} - \text{98\% control efficiency of scrubber}) / (\text{2000 pounds per ton}).$$

$$\text{PM-PM10} = (\text{200,000 pounds of ink produced per year maximum production}) \times (\text{30\% by weight of ink is pigment}) \times (\text{2 pounds of particulate per ton of pigment in ink produced emissions factor}) \times (\text{1} - \text{98\% control efficiency of scrubber}) / (\text{2000 pounds per ton}) / (\text{2000 pounds per ton}).$$

- (2) Compliance with the visible emission limitation shall be based on visible particulate emissions testing per OAC rule 3745-17-03(B)(1), (USEPA Method 9, 40 CFR 60, Appendix A).
- (3) Compliance with the percent by weight OC content limit in b)(2)b. shall be determined by the record keeping requirements as specified in d)(1).
- (4) Compliance with the ink production limitation in c)(1) shall be determined by the record keeping requirements as specified in d)(1).

g) Miscellaneous Requirements

- (1) The terms and conditions of this federally enforceable permit to install and operate supersede the terms and conditions of permit to install 14-05415, as issued on August 21, 2003, for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, and P037.



21. P029, FSH Mixer MX-107

Operations, Property and/or Equipment Description:

FSH Mixer MX-107

- 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. d)(2).
 - (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)(2)b., b)(2)d., c)(1), d)(1), e)(1), f)(1)b., f)(3), and f)(4).
- 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)	Organic compound (OC) emissions shall not exceed 1.20 pounds per hour and 20.57 pounds per day. Particulate matter (PM) emissions and particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.01 pound per hour and 0.01 ton per year (TPY). The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-17-07(A)(1).
b.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V	See b)(2)b., b)(2)d., c)(1), and Sections B.2., B.3., B.4., and B.5.
c.	OAC rule 3745-17-11	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.	OAC rule 3745-17-07(A)(1)	See b)(2)a.



(2) Additional Terms and Conditions

- a. Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
- b. The maximum OC content for the inks produced in this emissions unit shall not exceed 50 percent by weight.
- c. The hourly and daily emission limitations for OC and the hourly and annual emission limitations for PM-PM10 outlined above are based on the emissions unit's potential to emit (PTE) taking into consideration the batch type nature of the operation. Therefore, no daily records are required to demonstrate compliance with these limits.
- d. The combined annual organic compound (OC) emissions from emissions units P028, P029, P030, and P031, combined, shall not exceed 2.25 tons per year (TPY), based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with this emission limitation upon permit issuance.

- e. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the production limitation, OC content limitation, the use of a scrubber for particulate control, and the HAP, OC and PM/PM10 emissions limitations.

c) Operational Restrictions

- (1) The maximum annual ink production rate for emissions units P028, P029, P030, and P031 shall not exceed 600,000 pounds, based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with this production limitation upon permit issuance.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for emissions units P028, P029, P030, and P031, combined:

- a. The name and identification of each batch of ink produced;
- b. The OC content for each ink produced, in percent by weight;
- c. The amount of each ink produced, in pounds;
- d. The rolling, 12-month summation of the ink production figures, in pounds;
- e. The OC emissions from each ink produced, in pounds or tons, calculated by multiplying the pounds of ink produced by an emission factor of 0.0075 lb OC/pound of ink produced (AP-42 Table 6.4-1; 5/83);



- f. The rolling, 12-month summation of the total combined OC emissions from all inks produced, in pounds or tons;
- g. The amount of pigments (non-volatiles/solids) employed in tons; and
- h. The PM-PM10 emissions, in pounds or tons, calculated by multiplying the tons of pigments (non-volatiles/solids) employed by an emission factor of 2 pounds PM-PM10/ton pigment (AP-42 Table 6.7-1; 5/83) and by a scrubber control efficiency of (1-.98).

(2) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", 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 federally enforceable permit-to-install and operate (FEPTIO) 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 FEPTIO.

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:
 - the rolling, 12-month emission limitation for OC emissions specified in b)(2)d.;
 - the OC content limitation specified in b)(2)b.;
 - the rolling, 12-month production limitation specified in c)(1); and
 - the rolling, 12-month emission limitation for HAP emissions specified in Section B.2.
 - 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).

- (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 b)(1) and b)(2) shall be determined in accordance with the following methods:

- a. Emission Limitation:

Organic compound (OC) emissions shall not exceed 1.20 pounds per hour and 20.57 pounds per day.

Applicable Compliance Method:

The hourly and daily emission limitations are based upon the emissions unit's potential to emit. Potential OC emissions were determined based on the following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$OC = (160 \text{ pounds of ink produced per hour maximum production}) \times (0.0075 \text{ pound of OC per pound of ink produced emissions factor}).$

$OC = (160 \text{ pounds of ink produced per hour maximum production}) \times (0.0075 \text{ pound of OC per pound of ink produced emissions factor}) \times (17.1 \text{ hours per day maximum hours per day mixing}).$

- b. Emission Limitation:

The combined annual organic compound (OC) emissions from emissions units P028, P029, P030, and P031, combined, shall not exceed 2.25 tons per year (TPY), based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month OC emission limitation identified in b)(2)d. shall be demonstrated by the record keeping requirement identified in d)(1).

Actual OC emissions for emissions units P028, P029, P030, and P031 shall be determined based on the following equation from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$OC = \text{Sum of } [(pounds \text{ of ink produced} \times 0.0075 \text{ pound of OC per pound of ink produced emissions factor} / 2000 \text{ lbs per ton})]$ for each ink, and for each emissions unit.



c. Emission Limitation:

Particulate matter (PM) emissions and particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.01 pound per hour and 0.01 ton per year (TPY).

Applicable Compliance Method:

The hourly and annual emission limitations are based upon the emissions unit's potential to emit. Potential PM-PM10 emissions were determined based on the following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

PM-PM10 = (160 pounds of ink produced per hour maximum production) x (30% by weight of ink is pigment) x (2 pounds of particulate per ton of pigment in ink produced emissions factor) x (1 – 98% control efficiency of scrubber) / (2000 pounds per ton).

PM-PM10 = (200,000 pounds of ink produced per year maximum production) x (30% by weight of ink is pigment) x (2 pounds of particulate per ton of pigment in ink produced emissions factor) x (1 – 98% control efficiency of scrubber) / (2000 pounds per ton) / (2000 pounds per ton).

- (2) Compliance with the visible emission limitation shall be based on visible particulate emissions testing per OAC rule 3745-17-03(B)(1), (USEPA Method 9, 40 CFR 60, Appendix A).
- (3) Compliance with the percent by weight OC content limit in b)(2)b. shall be determined by the record keeping requirements as specified in d)(1).
- (4) Compliance with the ink production limitation in c)(1) shall be determined by the record keeping requirements as specified in d)(1).

g) Miscellaneous Requirements

- (1) The terms and conditions of this federally enforceable permit to install and operate supersede the terms and conditions of permit to install 14-05415, as issued on August 21, 2003, for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, and P037.



22. P032, Roto Mixer M-112

Operations, Property and/or Equipment Description:

Roto Mixer M-112

- 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. d)(2).
 - (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., c)(1), d)(1), e)(1), f)(1)b., f)(3), and f)(4).
- 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)	Organic compound (OC) emissions shall not exceed 1.85 pounds per hour and 26.65 pounds per day. Particulate matter (PM) emissions and particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.01 pound per hour and 0.01 ton per year (TPY). The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-17-07(A)(1).
b.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V	Organic compound (OC) emissions shall not exceed 0.31 ton per year (TPY), based on a rolling, 12-month summation. See b)(2)b., c)(1), and Sections B.2., B.3., B.4., and B.5.
c.	OAC rule 3745-17-11	The emission limitation specified by this



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-17-07(A)(1)	See b)(2)a.

(2) Additional Terms and Conditions

- a. Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
- b. The maximum OC content for the inks produced in this emissions unit shall not exceed 80 percent by weight.
- c. The hourly and daily emission limitations for OC and the hourly and annual emission limitations for PM-PM10 outlined above are based on the emissions unit's potential to emit (PTE) taking into consideration the batch type nature of the operation. Therefore, no daily records are required to demonstrate compliance with these limits.
- d. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the production limitation, OC content limitation, the use of a scrubber for particulate control, and the HAP, OC and PM/PM10 emissions limitations.

c) Operational Restrictions

- (1) The maximum annual ink production rate for this emissions unit shall not exceed 100,000 pounds, based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with this production limitation upon permit issuance.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for this emissions unit:
 - a. The name and identification of each batch of ink produced;
 - b. The OC content for each ink produced, in percent by weight;
 - c. The amount of each ink produced, in pounds;
 - d. The rolling, 12-month summation of the ink production figures, in pounds;
 - e. The OC emissions from each ink produced, in pounds or tons, calculated by multiplying the pounds of ink produced by an emission factor of 0.00617 lb OC/pound of ink produced (NAPIM table 3-3; 3/96);
 - f. The rolling, 12-month summation of the total combined OC emissions from all inks produced, in pounds or tons;



- g. The amount of pigments (non-volatiles/solids) employed in tons; and
 - h. The PM-PM10 emissions, in pounds or tons, calculated by multiplying the tons of pigments (non-volatiles/solids) employed by an emission factor of 2 pounds PM-PM10/ton pigment (AP-42 Table 6.7-1; 5/83) and by a scrubber control efficiency of (1-.98).
- (2) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", 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 federally enforceable permit-to-install and operate (FEPTIO) 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 FEPTIO.
- 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:
 - the rolling, 12-month emission limitation for OC emissions specified in b)(1)b.;
 - the OC content limitation specified in b)(2)b.;
 - the rolling, 12-month production limitation specified in c)(1); and
 - the rolling, 12-month emission limitation for HAP emissions specified in Section B.2.
 - 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).



- (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 b)(1) shall be determined in accordance with the following methods:

a. Emission Limitation:

Organic compound (OC) emissions shall not exceed 1.85 pounds per hour and 26.65 pounds per day.

Applicable Compliance Method:

The hourly and daily emission limitations are based upon the emissions unit's potential to emit. Potential OC emissions were determined based on the following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$OC = (300 \text{ pounds of ink produced per hour maximum production}) \times (0.00617 \text{ pound of OC per pound of ink produced emissions factor}).$

$OC = (300 \text{ pounds of ink produced per hour maximum production}) \times (0.00617 \text{ pound of OC per pound of ink produced emissions factor}) \times (14.4 \text{ hours per day maximum hours per day mixing}).$

b. Emission Limitation:

The annual organic compound (OC) emissions from this emissions unit shall not exceed 0.31 ton per year (TPY), based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month OC emission limitation identified in b)(1)b. shall be demonstrated by the record keeping requirement identified in d)(1).

Actual OC emissions for emissions unit P032 shall be determined based on the following equation from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$OC = \text{Sum of } [(pounds \text{ of ink produced} \times 0.00617 \text{ pound of OC per pound of ink produced emissions factor} / 2000 \text{ lbs per ton})]$ for each ink, and for each emissions unit.



c. Emission Limitation:

Particulate matter (PM) emissions and particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.01 pound per hour and 0.01 ton per year (TPY).

Applicable Compliance Method:

The hourly and annual emission limitations are based upon the emissions unit's potential to emit. Potential PM-PM10 emissions were determined based on the following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$PM-PM10 = (300 \text{ pounds of ink produced per hour maximum production}) \times (20\% \text{ by weight of ink is pigment}) \times (2 \text{ pounds of particulate per ton of pigment in ink produced emissions factor}) \times (1 - 98\% \text{ control efficiency of scrubber}) / (2000 \text{ pounds per ton}).$

$PM-PM10 = (100,000 \text{ pounds of ink produced per year maximum production}) \times (20\% \text{ by weight of ink is pigment}) \times (2 \text{ pounds of particulate per ton of pigment in ink produced emissions factor}) \times (1 - 98\% \text{ control efficiency of scrubber}) / (2000 \text{ pounds per ton}) / (2000 \text{ pounds per ton}).$

- (2) Compliance with the visible emission limitation shall be based on visible particulate emissions testing per OAC rule 3745-17-03(B)(1), (USEPA Method 9, 40 CFR 60, Appendix A).
- (3) Compliance with the percent by weight OC content limit in b)(2)b. shall be determined by the record keeping requirements as specified in d)(1).
- (4) Compliance with the ink production limitation in c)(1) shall be determined by the record keeping requirements as specified in d)(1).

g) Miscellaneous Requirements

- (1) The terms and conditions of this federally enforceable permit to install and operate supersede the terms and conditions of permit to install 14-05415, as issued on August 21, 2003, for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, and P037.



23. P033, Roto Mixer M-113

Operations, Property and/or Equipment Description:

Roto Mixer M-113

- 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. d)(2).
 - (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., c)(1), d)(1), e)(1), f)(1)b., f)(3), and f)(4).
- 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)	Organic compound (OC) emissions shall not exceed 0.90 pound per hour and 12.96 pounds per day. Particulate matter (PM) emissions and particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.01 pound per hour and 0.01 ton per year (TPY). The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-17-07(A)(1).
b.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V	Organic compound (OC) emissions shall not exceed 1.20 tons per year (TPY), based on a rolling, 12-month summation. See b)(2)b., c)(1), and Sections B.2., B.3., B.4., and B.5.
c.	OAC rule 3745-17-11	The emission limitation specified by this



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-17-07(A)(1)	See b)(2)a.

(2) Additional Terms and Conditions

- a. Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
- b. The maximum OC content for the inks produced in this emissions unit shall not exceed 20 percent by weight.
- c. The hourly and daily emission limitations for OC and the hourly and annual emission limitations for PM-PM10 outlined above are based on the emissions unit's potential to emit (PTE) taking into consideration the batch type nature of the operation. Therefore, no daily records are required to demonstrate compliance with these limits.
- d. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the production limitation, OC content limitation, the use of a scrubber for particulate control, and the HAP, OC and PM/PM10 emissions limitations.

c) Operational Restrictions

- (1) The maximum annual ink production rate for this emissions unit shall not exceed 800,000 pounds, based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with this production limitation upon permit issuance.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for this emissions unit:
 - a. The name and identification of each batch of ink produced;
 - b. The OC content for each ink produced, in percent by weight;
 - c. The amount of each ink produced, in pounds;
 - d. The rolling, 12-month summation of the ink production figures, in pounds;
 - e. The OC emissions from each ink produced, in pounds or tons, calculated by multiplying the pounds of ink produced by an emission factor of 0.003 lb OC/pound of ink produced (AP-42 Table 6.4-1; 5/83);
 - f. The rolling, 12-month summation of the total combined OC emissions from all inks produced, in pounds or tons;



- (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 b)(1) shall be determined in accordance with the following methods:

a. Emission Limitation:

Organic compound (OC) emissions shall not exceed 0.90 pound per hour and 12.96 pounds per day.

Applicable Compliance Method:

The hourly and daily emission limitations are based upon the emissions unit's potential to emit. Potential OC emissions were determined based on the following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$OC = (300 \text{ pounds of ink produced per hour maximum production}) \times (0.003 \text{ pound of OC per pound of ink produced emissions factor}).$

$OC = (300 \text{ pounds of ink produced per hour maximum production}) \times (0.003 \text{ pound of OC per pound of ink produced emissions factor}) \times (14.4 \text{ hours per day maximum hours per day mixing}).$

b. Emission Limitation:

The annual organic compound (OC) emissions from this emissions unit shall not exceed 1.20 tons per year (TPY), based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month OC emission limitation identified in b)(1)b. shall be demonstrated by the record keeping requirement identified in d)(1).

Actual OC emissions for emissions unit P033 shall be determined based on the following equation from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$OC = \text{Sum of } [(pounds \text{ of ink produced} \times 0.003 \text{ pound of OC per pound of ink produced emissions factor} / 2000 \text{ lbs per ton})]$ for each ink, and for each emissions unit.



c. Emission Limitation:

Particulate matter (PM) emissions and particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.01 pound per hour and 0.01 ton per year (TPY).

Applicable Compliance Method:

The hourly and annual emission limitations are based upon the emissions unit's potential to emit. Potential PM-PM10 emissions were determined based on the following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

PM-PM10 = (300 pounds of ink produced per hour maximum production) x (20% by weight of ink is pigment) x (2 pounds of particulate per ton of pigment in ink produced emissions factor) x (1 – 98% control efficiency of scrubber) / (2000 pounds per ton).

PM-PM10 = (800,000 pounds of ink produced per year maximum production) x (20% by weight of ink is pigment) x (2 pounds of particulate per ton of pigment in ink produced emissions factor) x (1 – 98% control efficiency of scrubber) / (2000 pounds per ton) / (2000 pounds per ton).

- (2) Compliance with the visible emission limitation shall be based on visible particulate emissions testing per OAC rule 3745-17-03(B)(1), (USEPA Method 9, 40 CFR 60, Appendix A).
- (3) Compliance with the percent by weight OC content limit in b)(2)b. shall be determined by the record keeping requirements as specified in d)(1).
- (4) Compliance with the ink production limitation in c)(1) shall be determined by the record keeping requirements as specified in d)(1).

g) Miscellaneous Requirements

- (1) The terms and conditions of this federally enforceable permit to install and operate supersede the terms and conditions of permit to install 14-05415, as issued on August 21, 2003, for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, and P037.



24. P037, 24 Pump Ink Dispensing System

Operations, Property and/or Equipment Description:

24 Pump Ink Dispensing System

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. d)(2).

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

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)	Organic compound (OC) emissions shall not exceed 1.20 pounds per hour and 23.04 pounds per day. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V	OC emissions shall not exceed 2.43 tons per year (TPY), based on a rolling, 12-month summation. See b)(2)a., c)(1), and Sections B.2., B.3., B.4., and B.5.

(2) Additional Terms and Conditions

a. The maximum OC content for the inks produced in this emissions unit shall not exceed 20 percent by weight.



- b. The hourly and daily emission limitations for OC outlined above are based on the emissions unit's potential to emit (PTE) taking into consideration the batch type nature of the operation. Therefore, no daily records are required to demonstrate compliance with these limits.
 - c. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the production limitation, OC content limitation, and the HAP and OC emissions limitations.
- c) Operational Restrictions
- (1) The maximum annual ink production rate for this emissions unit shall not exceed 1,620,000 pounds, based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with this production limitation upon permit issuance.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall collect and record the following information each month for this emissions unit:
 - a. The name and identification of each batch of ink produced;
 - b. The OC content for each ink produced, in percent by weight;
 - c. The amount of each ink produced, in pounds;
 - d. The rolling, 12-month summation of the ink production figures, in pounds;
 - e. The OC emissions from each ink produced, in pounds or tons, calculated by multiplying the pounds of ink produced by an emission factor of 0.003 lb OC/pound of ink produced (AP-42 Table 6.4-1; 5/83); and
 - f. The rolling, 12-month summation of the total combined OC emissions from all inks produced, in pounds or tons.
 - (2) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", 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 federally enforceable permit-to-install and operate (FEPTIO) 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 FEPTIO.
- 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:

the rolling, 12-month emission limitation for OC emissions specified in b)(1)b.;

the OC content limitation specified in b)(2)a.;

the rolling, 12-month production limitation specified in c)(1); and

the rolling, 12-month emission limitation for HAP emissions specified in Section B.2.

- 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).

- (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 b)(1) shall be determined in accordance with the following methods:

- a. Emission Limitation:

Organic compound (OC) emissions shall not exceed 1.20 pounds per hour and 23.04 pounds per day.

Applicable Compliance Method:

The hourly and daily emission limitations are based upon the emissions unit's potential to emit. Potential OC emissions were determined based on the following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:



OC = (400 pounds of ink produced per hour maximum production) x (0.003 pound of OC per pound of ink produced emissions factor).

OC = (400 pounds of ink produced per hour maximum production) x (0.003 pound of OC per pound of ink produced emissions factor) x (19.2 hours per day maximum hours per day mixing).

b. Emission Limitation:

The annual organic compound (OC) emissions from this emissions unit shall not exceed 2.43 tons per year (TPY), based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month OC emission limitation identified in b)(1)b. shall be demonstrated by the record keeping requirement identified in d)(1).

Actual OC emissions for emissions unit P037 shall be determined based on the following equation from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

OC = Sum of [(pounds of ink produced x 0.003 pound of OC per pound of ink produced emissions factor / 2000 lbs per ton)] for each ink, and for each emissions unit.

(2) Compliance with the percent by weight OC content limit in b)(2)a. shall be determined by the record keeping requirements as specified in d)(1).

(3) Compliance with the ink production limitation in c)(1) shall be determined by the record keeping requirements as specified in d)(1).

g) Miscellaneous Requirements

(1) The terms and conditions of this federally enforceable permit to install and operate supersede the terms and conditions of permit to install 14-05415, as issued on August 21, 2003, for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, and P037.



25. Emissions Unit Group - P003 and P005 Extender Tanks: P003, P005,

EU ID	Operations, Property and/or Equipment Description
P003	Extender Tank T-156 with Mixer
P005	Extender Tank T-158 with Mixer

- 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. d)(2).
- (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)(2)c., b)(2)d., c)(1), d)(1), e)(1), f)(1)b., f)(3), and f)(4).
- 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)	Organic compound (OC) emissions shall not exceed 2.44 pounds per hour and 50.27 pounds per day. Particulate matter (PM) emissions and particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.02 pound per hour and 0.03 ton per year (TPY). The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-17-07(A)(1).
b.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V	See b)(2)c., b)(2)d., c)(1), and Sections B.2., B.3., B.4., and B.5.
c.	OAC rule 3745-17-11	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.	OAC rule 3745-17-07(A)(1)	See b)(2)b.

(2) Additional Terms and Conditions

- a. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of tight-fitting covers, production limitation, OC content limitation, the use of a scrubber for particulate control and compliance with the HAP, OC and PM/PM10 emissions limitations.
- b. Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
- c. The maximum OC content for the inks produced in this emissions unit shall not exceed 10 percent by weight.
- d. The combined annual organic compound (OC) emissions from emissions units P003, P004, and P005 shall not exceed 8.63 tons per year (TPY), based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with this emission limitation upon permit issuance.

- e. The hourly and daily emission limitations for OC and the hourly and annual emission limitations for PM-PM10 outlined above are based on the emissions unit's potential to emit (PTE) taking into consideration the batch type nature of the operation. Therefore, no daily records are required to demonstrate compliance with these limits.

c) Operational Restrictions

- (1) The maximum annual ink production rate for emissions units P003, P004, and P005, combined, shall not exceed 15,000,000 pounds, based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with this production limitation upon permit issuance.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for emissions units P003, P004, and P005, combined:
 - a. The name and identification of each batch of ink produced;
 - b. The OC content for each ink produced, in percent by weight;
 - c. The amount of each ink produced, in pounds;
 - d. The rolling, 12-month summation of the ink production figures, in pounds;



- e. The OC emissions from each ink produced, in pounds or tons, calculated by multiplying the pounds of ink produced by an emission factor of 0.00115 lb OC/pound of ink produced (NAPIM Table 3-3; 3/96);
 - f. The rolling, 12-month summation of the total combined OC emissions from all inks produced, in pounds or tons;
 - g. The amount of pigments (non-volatiles/solids) employed in tons; and
 - h. The PM-PM10 emissions, in pounds or tons, calculated by multiplying the tons of pigments (non-volatiles/solids) employed by an emission factor of 2 pounds PM-PM10/ton pigment (AP-42 Table 6.7-1; 5/83) and by a scrubber control efficiency of (1-.98).
- (2) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", 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 federally enforceable permit-to-install and operate (FEPTIO) 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 FEPTIO.
- 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:
 - the rolling, 12-month emission limitation for OC emissions specified in b)(2)d.;
 - the OC content limitation specified in b)(2)c.;
 - the rolling, 12-month production limitation specified in c)(1); and
 - the rolling, 12-month emission limitation for HAP emissions specified in Section B.2.
 - 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).

- (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 b)(1) and b)(2) shall be determined in accordance with the following methods:

- a. Emission Limitation:

Organic compound (OC) emissions shall not exceed 2.44 pounds per hour and 50.27 pounds per day.

Applicable Compliance Method:

The hourly and daily emission limitations are based upon the emissions unit's potential to emit. Potential OC emissions were determined based on the following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$$OC = (2125 \text{ pounds of ink produced per hour maximum production}) \times (0.00115 \text{ pound of OC per pound of ink produced emissions factor}).$$

$$OC = (2125 \text{ pounds of ink produced per hour maximum production}) \times (0.00115 \text{ pound of OC per pound of ink produced emissions factor}) \times (20.6 \text{ hours per day maximum hours per day mixing}).$$

- b. Emission Limitation:

The combined annual organic compound (OC) emissions from emissions units P003, P004, and P005 shall not exceed 8.63 tons per year (TPY), based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month OC emission limitation identified in b)(2)d. shall be demonstrated by the record keeping requirement identified in d)(1).

Actual OC emissions for emissions units P003, P004, and P005 shall be determined based on the following equation from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:



OC = Sum of [(pounds of ink produced x 0.00115 pound of OC per pound of ink produced emissions factor / 2000 lbs per ton)] for each ink, and for each emissions unit.

c. Emission Limitation:

Particulate matter (PM) emissions and particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.02 pound per hour and 0.03 ton per year (TPY).

Applicable Compliance Method:

The hourly and annual emission limitations are based upon the emissions unit's potential to emit. Potential PM-PM10 emissions were determined based on the following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

PM-PM10 = (2125 pounds of ink produced per hour maximum production) x (50% by weight of ink is pigment) x (2 pounds of particulate per ton of pigment in ink produced emissions factor) x (1 - 98% control efficiency of scrubber) / (2000 pounds per ton).

PM-PM10 = (6,450,000 pounds of ink produced per year maximum production) x (50% by weight of ink is pigment) x (2 pounds of particulate per ton of pigment in ink produced emissions factor) x (1 - 98% control efficiency of scrubber) / (2000 pounds per ton) / (2000 pounds per ton).

- (2) Compliance with the visible emission limitation shall be based on visible particulate emissions testing per OAC rule 3745-17-03(B)(1), (USEPA Method 9, 40 CFR 60, Appendix A).
- (3) Compliance with the percent by weight OC content limit in b)(2)c. shall be determined by the record keeping requirements as specified in d)(1).
- (4) Compliance with the ink production limitation in c)(1) shall be determined by the record keeping requirements as specified in d)(1).

g) Miscellaneous Requirements

- (1) The terms and conditions of this federally enforceable permit to install and operate supersede the terms and conditions of permit to install 14-05415, as issued on August 21, 2003, for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, and P037.



26. Emissions Unit Group - P009 and P010 Color Tanks: P009, P010,

EU ID	Operations, Property and/or Equipment Description
P009	Color Tank T-125 with Mixer
P010	Color Tank T-126 with Mixer

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. d)(2).

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

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)	Organic compound (OC) emissions shall not exceed 1.89 pounds per hour and 37.72 pounds per day. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V	See b)(2)b., b)(2)d., c)(1), and Sections B.2., B.3., B.4., and B.5.

(2) Additional Terms and Conditions

a. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the production limitation, OC content limitation, and the HAP and OC emissions limitations.

b. The maximum OC content for the inks produced in this emissions unit shall not exceed 10 percent by weight.



- c. The hourly and daily emission limitations for OC outlined above are based on the emissions unit's potential to emit (PTE) taking into consideration the batch type nature of the operation. Therefore, no daily records are required to demonstrate compliance with these limits.
- d. The combined annual organic compound (OC) emissions from emissions units P009, P010, and P011 shall not exceed 8.05 tons per year (TPY), based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with this emission limitation upon permit issuance.

c) Operational Restrictions

- (1) The maximum annual ink production rate for emissions units P009, P010, and P011 shall not exceed 14,000,000 pounds, based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with this production limitation upon permit issuance.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for emissions units P009, P010, and P011, combined:
 - a. The name and identification of each batch of ink produced;
 - b. The OC content for each ink produced, in percent by weight;
 - c. The amount of each ink produced, in pounds;
 - d. The rolling, 12-month summation of the ink production figures, in pounds;
 - e. The OC emissions from each ink produced, in pounds or tons, calculated by multiplying the pounds of ink produced by an emission factor of 0.00115 lb OC/pound of ink produced (NAPIM Table 3-3; 3/96); and
 - f. The rolling, 12-month summation of the total combined OC emissions from all inks produced, in pounds or tons.

- (2) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", 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 federally enforceable permit-to-install and operate (FEPTIO) 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 FEPTIO.

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:

the rolling, 12-month emission limitation for OC emissions specified in b)(2)d.;

the OC content limitation specified in b)(2)b.;

the rolling, 12-month production limitation specified in c)(1); and

the rolling, 12-month emission limitation for HAP emissions specified in Section B.2.

- 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).

- (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 b)(1) and b)(2) shall be determined in accordance with the following methods:

- a. Emission Limitation:

Organic compound (OC) emissions shall not exceed 1.89 pounds per hour and 37.72 pounds per day.

Applicable Compliance Method:

The hourly and daily emission limitations are based upon the emissions unit's potential to emit. Potential OC emissions were determined based on the



following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$OC = (1640 \text{ pounds of ink produced per hour maximum production}) \times (0.00115 \text{ pound of OC per pound of ink produced emissions factor}).$

$OC = (1640 \text{ pounds of ink produced per hour maximum production}) \times (0.00115 \text{ pound of OC per pound of ink produced emissions factor}) \times (20.0 \text{ hours per day maximum hours per day mixing}).$

b. Emission Limitation:

The combined annual organic compound (OC) emissions from emissions units P009, P010, and P011 shall not exceed 8.05 tons per year (TPY), based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month OC emission limitation identified in b)(2)d. shall be demonstrated by the record keeping requirement identified in d)(1).

Actual OC emissions for emissions units P009, P010, and P011 shall be determined based on the following equation from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$OC = \text{Sum of } [(pounds \text{ of ink produced} \times 0.00115 \text{ pound of OC per pound of ink produced emissions factor} / 2000 \text{ lbs per ton})]$ for each ink, and for each emissions unit.

- (2) Compliance with the percent by weight OC content limit in b)(2)b. shall be determined by the record keeping requirements as specified in d)(1).
- (3) Compliance with the ink production limitation in c)(1) shall be determined by the record keeping requirements as specified in d)(1).

g) Miscellaneous Requirements

- (1) The terms and conditions of this federally enforceable permit to install and operate supersede the terms and conditions of permit to install 14-05415, as issued on August 21, 2003, for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, and P037.



27. Emissions Unit Group - P017 and P018 Poly Premix Tanks: P017, P018,

EU ID	Operations, Property and/or Equipment Description
P017	Poly Premix Tank MX-118 with Mixer
P018	Poly Premix Tank MX-146 with Mixer

- 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. d)(2).
- (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)(2)b., b)(2)d., c)(1), d)(1), e)(1), f)(1)b., f)(3), and f)(4).
- 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)	Organic compound (OC) emissions shall not exceed 0.69 pound per hour and 15.06 pounds per day. Particulate matter (PM) emissions and particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.01 pound per hour and 0.01 ton per year (TPY). The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-17-07(A)(1).
b.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V	See b)(2)b., b)(2)d., c)(1), and Sections B.2., B.3., B.4., and B.5.
c.	OAC rule 3745-17-11	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.	OAC rule 3745-17-07(A)(1)	See b)(2)a.

(2) Additional Terms and Conditions

- a. Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
- b. The maximum OC content for the inks produced in this emissions unit shall not exceed 20 percent by weight.
- c. The hourly and daily emission limitations for OC and the hourly and annual emission limitations for PM-PM10 outlined above are based on the emissions unit's potential to emit (PTE) taking into consideration the batch type nature of the operation. Therefore, no daily records are required to demonstrate compliance with these limits.
- d. The combined annual organic compound (OC) emissions from emissions units P016, P017, P018, P019, P020, and P021, combined, shall not exceed 7.50 tons per year (TPY), based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with this emission limitation upon permit issuance.
- e. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the production limitation, OC content limitation, the use of a scrubber for particulate control, and the HAP, OC and PM/PM10 emissions limitations.

c) Operational Restrictions

- (1) The maximum annual ink production rate for emissions units P016, P017, P018, P019, P020, and P021 shall not exceed 5,000,000 pounds, based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with this production limitation upon permit issuance.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for emissions units P016, P017, P018, P019, P020, and P021, combined:
 - a. The name and identification of each batch of ink produced;
 - b. The OC content for each ink produced, in percent by weight;
 - c. The amount of each ink produced, in pounds;
 - d. The rolling, 12-month summation of the ink production figures, in pounds;



- e. The OC emissions from each ink produced, in pounds or tons, calculated by multiplying the pounds of ink produced by an emission factor of 0.003 lb OC/pound of ink produced (AP-42 Table 6.4-1; 5/83);
 - f. The rolling, 12-month summation of the total combined OC emissions from all inks produced, in pounds or tons;
 - g. The amount of pigments (non-volatiles/solids) employed in tons; and
 - h. The PM-PM10 emissions, in pounds or tons, calculated by multiplying the tons of pigments (non-volatiles/solids) employed by an emission factor of 2 pounds PM-PM10/ton pigment (AP-42 Table 6.7-1; 5/83) and by a scrubber control efficiency of (1-.98).
- (2) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", 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 federally enforceable permit-to-install and operate (FEPTIO) 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 FEPTIO.
- 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:
 - the rolling, 12-month emission limitation for OC emissions specified in b)(2)d.;
 - the OC content limitation specified in b)(2)b.;
 - the rolling, 12-month production limitation specified in c)(1); and
 - the rolling, 12-month emission limitation for HAP emissions specified in Section B.2.
 - 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).

- (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 b)(1) and b)(2) shall be determined in accordance with the following methods:

- a. Emission Limitation:

Organic compound (OC) emissions shall not exceed 0.69 pound per hour and 15.06 pounds per day.

Applicable Compliance Method:

The hourly and daily emission limitations are based upon the emissions unit's potential to emit. Potential OC emissions were determined based on the following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$$OC = (230 \text{ pounds of ink produced per hour maximum production}) \times (0.003 \text{ pound of OC per pound of ink produced emissions factor}).$$

$$OC = (230 \text{ pounds of ink produced per hour maximum production}) \times (0.003 \text{ pound of OC per pound of ink produced emissions factor}) \times (21.8 \text{ hours per day maximum hours per day mixing}).$$

- b. Emission Limitation:

The combined annual organic compound (OC) emissions from emissions units P016, P017, P018, P019, P020, and P021, combined, shall not exceed 7.50 tons per year (TPY), based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month OC emission limitation identified in b)(2)d. shall be demonstrated by the record keeping requirement identified in d)(1).

Actual OC emissions for emissions units P016, P017, P018, P019, P020, and P021 shall be determined based on the following equation from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:



OC = Sum of [(pounds of ink produced x 0.003 pound of OC per pound of ink produced emissions factor / 2000 lbs per ton)] for each ink, and for each emissions unit.

c. Emission Limitation:

Particulate matter (PM) emissions and particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.01 pound per hour and 0.01 ton per year (TPY).

Applicable Compliance Method:

The hourly and annual emission limitations are based upon the emissions unit's potential to emit. Potential PM-PM10 emissions were determined based on the following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

PM-PM10 = (230 pounds of ink produced per hour maximum production) x (25% by weight of ink is pigment) x (2 pounds of particulate per ton of pigment in ink produced emissions factor) x (1 – 98% control efficiency of scrubber) / (2000 pounds per ton).

PM-PM10 = (700,000 pounds of ink produced per year maximum production) x (25% by weight of ink is pigment) x (2 pounds of particulate per ton of pigment in ink produced emissions factor) x (1 – 98% control efficiency of scrubber) / (2000 pounds per ton) / (2000 pounds per ton).

- (2) Compliance with the visible emission limitation shall be based on visible particulate emissions testing per OAC rule 3745-17-03(B)(1), (USEPA Method 9, 40 CFR 60, Appendix A).
- (3) Compliance with the percent by weight OC content limit in b)(2)b. shall be determined by the record keeping requirements as specified in d)(1).
- (4) Compliance with the ink production limitation in c)(1) shall be determined by the record keeping requirements as specified in d)(1).

g) Miscellaneous Requirements

- (1) The terms and conditions of this federally enforceable permit to install and operate supersede the terms and conditions of permit to install 14-05415, as issued on August 21, 2003, for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, and P037.



28. Emissions Unit Group - P020 and P021 Mills: P020, P021,

EU ID	Operations, Property and/or Equipment Description
P020	Drais Mill System and Letdown Tank
P021	Premier Mill and Letdown Mixer

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. d)(2).

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

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)	Organic compound (OC) emissions shall not exceed 0.69 pound per hour and 15.06 pounds per day. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V	See b)(2)a., b)(2)c., c)(1), and Sections B.2., B.3., B.4., and B.5.

(2) Additional Terms and Conditions

a. The maximum OC content for the inks produced in this emissions unit shall not exceed 20 percent by weight.

b. The hourly and daily emission limitations for OC outlined above are based on the emissions unit's potential to emit (PTE) taking into consideration the batch type nature of the operation. Therefore, no daily records are required to demonstrate compliance with these limits.



- c. The combined annual organic compound (OC) emissions from emissions units P016, P017, P018, P019, P020, and P021, combined, shall not exceed 7.50 tons per year (TPY), based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with this emission limitation upon permit issuance.

- d. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the production limitation, OC content limitation, and the HAP and OC emissions limitations.

c) Operational Restrictions

- (1) The maximum annual ink production rate for emissions units P016, P017, P018, P019, P020, and P021 shall not exceed 5,000,000 pounds, based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with this production limitation upon permit issuance.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for emissions units P016, P017, P018, P019, P020, and P021, combined:

- a. The name and identification of each batch of ink produced;
- b. The OC content for each ink produced, in percent by weight;
- c. The amount of each ink produced, in pounds;
- d. The rolling, 12-month summation of the ink production figures, in pounds;
- e. The OC emissions from each ink produced, in pounds or tons, calculated by multiplying the pounds of ink produced by an emission factor of 0.003 lb OC/pound of ink produced (AP-42 Table 6.4-1; 5/83); and
- f. The rolling, 12-month summation of the total combined OC emissions from all inks produced, in pounds or tons.

- (2) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", 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 federally enforceable permit-to-install and operate (FEPTIO) 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 FEPTIO.

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:

the rolling, 12-month emission limitation for OC emissions specified in b)(2)c.;

the OC content limitation specified in b)(2)a.;

the rolling, 12-month production limitation specified in c)(1); and

the rolling, 12-month emission limitation for HAP emissions specified in Section B.2.

- 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).

- (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 b)(1) and b)(2) shall be determined in accordance with the following methods:

- a. Emission Limitation:

Organic compound (OC) emissions shall not exceed 0.69 pound per hour and 15.06 pounds per day.

Applicable Compliance Method:

The hourly and daily emission limitations are based upon the emissions unit's potential to emit. Potential OC emissions were determined based on the



following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$$OC = (230 \text{ pounds of ink produced per hour maximum production}) \times (0.003 \text{ pound of OC per pound of ink produced emissions factor}).$$

$$OC = (230 \text{ pounds of ink produced per hour maximum production}) \times (0.003 \text{ pound of OC per pound of ink produced emissions factor}) \times (21.8 \text{ hours per day maximum hours per day mixing}).$$

b. Emission Limitation:

The combined annual organic compound (OC) emissions from emissions units P016, P017, P018, P019, P020, and P021, combined, shall not exceed 7.50 tons per year (TPY), based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month OC emission limitation identified in b)(2)c. shall be demonstrated by the record keeping requirement identified in d)(1).

Actual OC emissions for emissions units P016, P017, P018, P019, P020, and P021 shall be determined based on the following equation from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$$OC = \text{Sum of } [(pounds \text{ of ink produced} \times 0.003 \text{ pound of OC per pound of ink produced emissions factor} / 2000 \text{ lbs per ton)] \text{ for each ink, and for each emissions unit.}$$

- (2) Compliance with the percent by weight OC content limit in b)(2)a. shall be determined by the record keeping requirements as specified in d)(1).
- (3) Compliance with the ink production limitation in c)(1) shall be determined by the record keeping requirements as specified in d)(1).

g) Miscellaneous Requirements

- (1) The terms and conditions of this federally enforceable permit to install and operate supersede the terms and conditions of permit to install 14-05415, as issued on August 21, 2003, for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, and P037.



29. Emissions Unit Group - P030 and P031 Bench Mixers: P030, P031,

EU ID	Operations, Property and/or Equipment Description
P030	Bench Mixer No. 1
P031	Bench Mixer No. 2

- 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. d)(2).
 - (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)(2)b., b)(2)d., c)(1), d)(1), e)(1), f)(1)b., f)(3), and f)(4).
- 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)	Organic compound (OC) emissions shall not exceed 0.30 pound per hour and 4.80 pounds per day. Particulate matter (PM) emissions and particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.01 pound per hour and 0.01 ton per year (TPY). The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-17-07(A)(1).
b.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V	See b)(2)b., b)(2)d., c)(1), and Sections B.2., B.3., B.4., and B.5.
c.	OAC rule 3745-17-11	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.	OAC rule 3745-17-07(A)(1)	See b)(2)a.

(2) Additional Terms and Conditions

- a. Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
- b. The maximum OC content for the inks produced in this emissions unit shall not exceed 50 percent by weight.
- c. The hourly and daily emission limitations for OC and the hourly and annual emission limitations for PM-PM10 outlined above are based on the emissions unit's potential to emit (PTE) taking into consideration the batch type nature of the operation. Therefore, no daily records are required to demonstrate compliance with these limits.
- d. The combined annual organic compound (OC) emissions from emissions units P028, P029, P030, and P031, combined, shall not exceed 2.25 tons per year (TPY), based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with this emission limitation upon permit issuance.
- e. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the production limitation, OC content limitation, the use of a scrubber for particulate control, and the HAP, OC and PM/PM10 emissions limitations.

c) Operational Restrictions

- (1) The maximum annual ink production rate for emissions units P028, P029, P030, and P031 shall not exceed 600,000 pounds, based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with this production limitation upon permit issuance.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for emissions units P028, P029, P030, and P031, combined:
 - a. The name and identification of each batch of ink produced;
 - b. The OC content for each ink produced, in percent by weight;
 - c. The amount of each ink produced, in pounds;
 - d. The rolling, 12-month summation of the ink production figures, in pounds;



- e. The OC emissions from each ink produced, in pounds or tons, calculated by multiplying the pounds of ink produced by an emission factor of 0.0075 lb OC/pound of ink produced (AP-42 Table 6.4-1; 5/83);
 - f. The rolling, 12-month summation of the total combined OC emissions from all inks produced, in pounds or tons;
 - g. The amount of pigments (non-volatiles/solids) employed in tons; and
 - h. The PM-PM10 emissions, in pounds or tons, calculated by multiplying the tons of pigments (non-volatiles/solids) employed by an emission factor of 2 pounds PM-PM10/ton pigment (AP-42 Table 6.7-1; 5/83) and by a scrubber control efficiency of (1-.98).
- (2) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", 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 federally enforceable permit-to-install and operate (FEPTIO) 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 FEPTIO.
- 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:
 - the rolling, 12-month emission limitation for OC emissions specified in b)(2)d.;
 - the OC content limitation specified in b)(2)b.;
 - the rolling, 12-month production limitation specified in c)(1); and
 - the rolling, 12-month emission limitation for HAP emissions specified in Section B.2.
 - 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).

- (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 b)(1) and b)(2) shall be determined in accordance with the following methods:

- a. Emission Limitation:

Organic compound (OC) emissions shall not exceed 0.30 pound per hour and 4.80 pounds per day.

Applicable Compliance Method:

The hourly and daily emission limitations are based upon the emissions unit's potential to emit. Potential OC emissions were determined based on the following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$$OC = (40 \text{ pounds of ink produced per hour maximum production}) \times (0.0075 \text{ pound of OC per pound of ink produced emissions factor}).$$

$$OC = (40 \text{ pounds of ink produced per hour maximum production}) \times (0.0075 \text{ pound of OC per pound of ink produced emissions factor}) \times (16 \text{ hours per day maximum hours per day mixing}).$$

- b. Emission Limitation:

The combined annual organic compound (OC) emissions from emissions units P028, P029, P030, and P031, combined, shall not exceed 2.25 tons per year (TPY), based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month OC emission limitation identified in b)(2)d. shall be demonstrated by the record keeping requirement identified in d)(1).

Actual OC emissions for emissions units P028, P029, P030, and P031 shall be determined based on the following equation from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:



OC = Sum of [(pounds of ink produced x 0.0075 pound of OC per pound of ink produced emissions factor / 2000 lbs per ton)] for each ink, and for each emissions unit.

c. Emission Limitation:

Particulate matter (PM) emissions and particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.01 pound per hour and 0.01 ton per year (TPY).

Applicable Compliance Method:

The hourly and annual emission limitations are based upon the emissions unit's potential to emit. Potential PM-PM10 emissions were determined based on the following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

PM-PM10 = (40 pounds of ink produced per hour maximum production) x (30% by weight of ink is pigment) x (2 pounds of particulate per ton of pigment in ink produced emissions factor) x (1 – 98% control efficiency of scrubber) / (2000 pounds per ton).

PM-PM10 = (100,000 pounds of ink produced per year maximum production) x (30% by weight of ink is pigment) x (2 pounds of particulate per ton of pigment in ink produced emissions factor) x (1 – 98% control efficiency of scrubber) / (2000 pounds per ton) / (2000 pounds per ton).

- (2) Compliance with the visible emission limitation shall be based on visible particulate emissions testing per OAC rule 3745-17-03(B)(1), (USEPA Method 9, 40 CFR 60, Appendix A).
- (3) Compliance with the percent by weight OC content limit in b)(2)b. shall be determined by the record keeping requirements as specified in d)(1).
- (4) Compliance with the ink production limitation in c)(1) shall be determined by the record keeping requirements as specified in d)(1).

g) Miscellaneous Requirements

- (1) The terms and conditions of this federally enforceable permit to install and operate supersede the terms and conditions of permit to install 14-05415, as issued on August 21, 2003, for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, and P037.



30. Emissions Unit Group - P034 - P036 Roto Mixers: P034, P035, P036,

EU ID	Operations, Property and/or Equipment Description
P034	Roto Mixer M-114
P035	Roto Mixer M-115
P036	Roto Mixer M-116

- 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. d)(2).
 - (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)(2)b., b)(2)d., c)(1), d)(1), e)(1), f)(1)b., f)(3), and f)(4).
- 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)	Organic compound (OC) emissions shall not exceed 0.35 pound per hour and 4.97 pounds per day. Particulate matter (PM) emissions and particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.01 pound per hour and 0.01 ton per year (TPY). The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-17-07(A)(1).
b.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V	See b)(2)b., b)(2)d., c)(1), and Sections B.2., B.3., B.4., and B.5.
c.	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		rule 3745-31-05(A)(3).
d.	OAC rule 3745-17-07(A)(1)	See b)(2)a.

(2) Additional Terms and Conditions

- a. Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
- b. The maximum OC content for the inks produced in this emissions unit shall not exceed 10 percent by weight.
- c. The hourly and daily emission limitations for OC and the hourly and annual emission limitations for PM-PM10 outlined above are based on the emissions unit's potential to emit (PTE) taking into consideration the batch type nature of the operation. Therefore, no daily records are required to demonstrate compliance with these limits.
- d. The combined annual organic compound (OC) emissions from emissions units P034, P035, and P036, combined, shall not exceed 1.38 tons per year (TPY), based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with this emission limitation upon permit issuance.
- e. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the production limitation, OC content limitation, the use of a scrubber for particulate control, and the HAP, OC and PM/PM10 emissions limitations.

c) Operational Restrictions

- (1) The maximum annual ink production rate for emissions units P034, P035, and P036 shall not exceed 2,400,000 pounds, based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with this production limitation upon permit issuance.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for emissions units P034, P035, and P036, combined:
 - a. The name and identification of each batch of ink produced;
 - b. The OC content for each ink produced, in percent by weight;
 - c. The amount of each ink produced, in pounds;
 - d. The rolling, 12-month summation of the ink production figures, in pounds;



- e. The OC emissions from each ink produced, in pounds or tons, calculated by multiplying the pounds of ink produced by an emission factor of 0.00115 lb OC/pound of ink produced (NAPIM Table 3-3; 3/96);
 - f. The rolling, 12-month summation of the total combined OC emissions from all inks produced, in pounds or tons;
 - g. The amount of pigments (non-volatiles/solids) employed in tons; and
 - h. The PM-PM10 emissions, in pounds or tons, calculated by multiplying the tons of pigments (non-volatiles/solids) employed by an emission factor of 2 pounds PM-PM10/ton pigment (AP-42 Table 6.7-1; 5/83) and by a scrubber control efficiency of (1-.98).
- (2) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", 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 federally enforceable permit-to-install and operate (FEPTIO) 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 FEPTIO.
- 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:
 - the rolling, 12-month emission limitation for OC emissions specified in b)(2)d.;
 - the OC content limitation specified in b)(2)b.;
 - the rolling, 12-month production limitation specified in c)(1); and
 - the rolling, 12-month emission limitation for HAP emissions specified in Section B.2.
 - 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).

- (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 b)(1) and b)(2) shall be determined in accordance with the following methods:

a. Emission Limitation:

Organic compound (OC) emissions shall not exceed 0.35 pound per hour and 4.97 pounds per day.

Applicable Compliance Method:

The hourly and daily emission limitations are based upon the emissions unit's potential to emit. Potential OC emissions were determined based on the following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

$OC = (300 \text{ pounds of ink produced per hour maximum production}) \times (0.00115 \text{ pound of OC per pound of ink produced emissions factor}).$

$OC = (300 \text{ pounds of ink produced per hour maximum production}) \times (0.00115 \text{ pound of OC per pound of ink produced emissions factor}) \times (14.4 \text{ hours per day maximum hours per day mixing}).$

b. Emission Limitation:

The combined annual organic compound (OC) emissions from emissions units P034, P035, and P036, combined, shall not exceed 1.38 tons per year (TPY), based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month OC emission limitation identified in b)(2)d. shall be demonstrated by the record keeping requirement identified in d)(1).

Actual OC emissions for emissions units P034, P035, and P036 shall be determined based on the following equation from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:



OC = Sum of [(pounds of ink produced x 0.00115 pound of OC per pound of ink produced emissions factor / 2000 lbs per ton)] for each ink, and for each emissions unit.

c. Emission Limitation:

Particulate matter (PM) emissions and particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.01 pound per hour and 0.01 ton per year (TPY).

Applicable Compliance Method:

The hourly and annual emission limitations are based upon the emissions unit's potential to emit. Potential PM-PM10 emissions were determined based on the following equations from the permittee-supplied information in PTI application 14-05415 as submitted on March 19, 2003:

PM-PM10 = (300 pounds of ink produced per hour maximum production) x (20% by weight of ink is pigment) x (2 pounds of particulate per ton of pigment in ink produced emissions factor) x (1 – 98% control efficiency of scrubber) / (2000 pounds per ton).

PM-PM10 = (800,000 pounds of ink produced per year maximum production) x (20% by weight of ink is pigment) x (2 pounds of particulate per ton of pigment in ink produced emissions factor) x (1 – 98% control efficiency of scrubber) / (2000 pounds per ton) / (2000 pounds per ton).

- (2) Compliance with the visible emission limitation shall be based on visible particulate emissions testing per OAC rule 3745-17-03(B)(1), (USEPA Method 9, 40 CFR 60, Appendix A).
- (3) Compliance with the percent by weight OC content limit in b)(2)b. shall be determined by the record keeping requirements as specified in d)(1).
- (4) Compliance with the ink production limitation in c)(1) shall be determined by the record keeping requirements as specified in d)(1).

g) Miscellaneous Requirements

- (1) The terms and conditions of this federally enforceable permit to install and operate supersede the terms and conditions of permit to install 14-05415, as issued on August 21, 2003, for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, and P037.