State of Ohio Environmental Protection Agency

Street Address:
Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

TELE: (614) 644-3020 **FAX:** (614) 644-2329

Mailing Address:
Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

05/16/01

CERTIFIED MAIL

RE: Final Title V Chapter 3745-77 permit

06-61-00-0027
International Converter, Inc. - Caldwell
Jeffrie D'Costa
17153 CR 57
Caldwell, OH 43724

Dear Jeffrie D'Costa:

Enclosed is the Title V permit that allows you to operate the facility in the manner indicated in the permit. Because this permit may contain several conditions and restrictions, we urge you to read it carefully.

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street
Room 300
Columbus, Ohio 43215

If you have any questions, please contact Southeast District Office.

Very truly yours,

Thomas G. Rigo

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: Southeast District Office
File, DAPC PMU

State of Ohio Environmental Protection Agency

FINAL TITLE V PERMIT

Issue Date: **05/16/01**	Effective Date: **05/16/01**	Expiration Date: **05/16/06**

This document constitutes issuance of a Title V permit for Facility ID 06-61-00-0027 to:
International Converter, Inc. - Caldwell
17153 CR 57
CALDWELL, OH 43724

Emissions Unit ID (Company ID)/Emissions Unit Activity Description

K001 (LAMINATOR #1)
FOIL PAPER LAMINATOR WITH ONE GRAVURE ROLL COATING/PRINTING STATION

K002 (LAMINATOR #2)
FOIL PAPER LAMINATOR WITH ONE GRAVURE ROLL COATING/PRINTING STATION

K003 (LAMINATOR #3)
FOIL PAPER LAMINATOR WITH ONE GRAVURE ROLL COATING/PRINTING STATION

K004 (LAMINATOR #4)
FOIL PAPER LAMINATOR WITH ONE GRAVURE ROLL COATING/PRINTING STATION

K005 (LAMINATOR #5)
FOIL GRAVURE ROLL COATING/PRINTING STATION

K006 (FLEXOGRAPHIC PRESS#1)
3 COLOR FLEXOGRAPHIC PRINTING PRESS COATING/PRINTING STATION

K007 (FLEXOGRAPHIC PRESS#2)
5 COLOR FLEXOGRAPHIC PRINTING PRESS COATING/PRINTING STATION

K008 (FLEXOGRAPHIC PRESS #3)
6 COLOR FLEXOGRAPHIC PRINTING PRESS COATING/PRINTING STATION

K009 (LAMINATOR # 6)
FOIL PAPER LAMINATOR WITH ONE GRAVURE ROLL COATING/PRINTING STATION

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-04(A) and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

Southeast District Office
2195 Front Street
Logan, OH 43138
(740) 385-8501

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

1. Monitoring and Related Recordkeeping and Reporting Requirements

a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

i. The date, place (as defined in the permit), and time of sampling or measurements.
ii. The date(s) analyses were performed.
iii. The company or entity that performed the analyses.
iv. The analytical techniques or methods used.
v. The results of such analyses.
vi. The operating conditions existing at the time of sampling or measurement.

b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

i. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
ii. Quarterly written reports of (i) any deviations from federally enforceable <u>emission limitations</u>, <u>operational restrictions</u>, <u>and control device operating parameter limitations</u>, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. These quarterly written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations except malfunctions, which shall be reported in accordance with OAC rule 3745-15-06. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.) See B.8 below if no deviations occurred during the quarter.
iii. Written reports, which identify any deviations from the federally enforceable <u>monitoring</u>, <u>recordkeeping</u>, <u>and reporting requirements</u> contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i)

and (ii) pertaining to the reporting of any deviations related to the monitoring, recordkeeping, and reporting requirements. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports submitted pursuant to OAC rule 3745-15-06 shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of deviations caused by malfunctions or upsets.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

6. General Requirements

a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d. This permit does not convey any property rights of any sort, or any exclusive privilege.

e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

8. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

9. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these general terms and conditions shall apply to all operating scenarios authorized in this permit.

10. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than

the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b. This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c. The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d. The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

11. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

12. Compliance Requirements

a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement.

Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the appropriate Ohio EPA District Office or local air agency in the following manner and with the following content:

i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
ii. Compliance certifications shall include the following:

(a) An identification of each term or condition of this permit that is the basis of the certification.
(b) The permittee's current compliance status.
(c) Whether compliance was continuous or intermittent.
(d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.
(e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

13. Permit Shield

a. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b. This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

14. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed

therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

15. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

16. Off Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

a. The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition;

b. The permittee provides contemporaneous written notice of the change to the director and the administrator, except that no such notice shall be required for changes that qualify as insignificant emission levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change;

c. The change shall not qualify for the permit shield under OAC rule 3745-77-07(F);

d. The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes; and

e. The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit to install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(For further clarification, the permittee can refer to Engineering Guide #63 that is available in their STARSHIP software package.)

17. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.

18. Insignificant Activity

Each insignificant activity that has one or more applicable requirements shall comply with those applicable requirements.

B. State Only Enforceable Section

1. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

8. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforcable Section

None

B. State Only Enforceable Section

1. The following insignificant emissions units are located at this facility:

B001 - 2.2 mmBtu/hr natural gas-fired boiler;
T001 - 4,000-gallon storage tank #1;
T002 - 4,000-gallon storage tank #2; and
Z001 - ink mix room.

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a permit to install for the emissions unit.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: LAMINATOR #1 (K001)

Activity Description: FOIL PAPER LAMINATOR WITH ONE GRAVURE ROLL COATING/PRINTING STATION

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
packaging rotogravure printing line controlled with a catalytic incinerator - foil paper laminator #1	OAC rule 3745-31-05(A)(3) (PTI 06-4083)	6.25 lbs/hr of volatile organic compounds (VOC), including cleanup materials
		minimum 75% overall control efficiency
		249.0 tpy of VOC emissions for emissions units K001 through K009, as a rolling, 12-month summation
	OAC rule 3745-21-09(Y)	See A.I.2.a below.

2. Additional Terms and Conditions

2.a The VOC emission limitation required by OAC rule 3745-21-09(Y) is less stringent than the VOC emission limitations established pursuant to the best available technology requirement specified in OAC rule 3745-31-05.

II. Operational Restrictions

1. This emissions unit shall be vented to the catalytic incinerator whenever any coating or ink is employed that contains more than 1.14 pounds of VOC per gallon, excluding water and exempt solvents.

2. The average temperature of the process vent stream immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance.

3. The average temperature difference across the catalyst bed at maximum operating capacity, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 80 percent of the average temperature difference during the most recent performance test that demonstrated the emissions unit was in compliance.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain continuous temperature monitors and recorder(s) which measure and record(s) the temperature immediately upstream and downstream of the incinerator's catalyst bed when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorder(s) shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

2. The permittee shall collect and record the following information for each day for the control equipment:

a. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance;

b. all 3-hour blocks of time (when the emissions unit was operating at maximum capacity) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent performance test that demonstrated the emissions unit was in compliance; and

c. a log of the downtime for the capture (collection) system, control device, and monitoring equipment when the associated emissions unit was in operation.

3. The permitttee shall collect and record the following information on a daily basis for this emissions unit for all periods of time during which the coatings and inks are vented to the catalytic incinerator:

a. the name and identification number of each coating and ink, as applied;

b. the VOC content of each coating and ink, as applied, in pounds per gallon;

c. the number of gallons of each coating and ink employed;

d. the name and identification of each cleanup material employed;

e. the number of gallons of each cleanup material employed;

f. the VOC content of each cleanup material, in pounds per gallon;

g. the total number of hours the emissions unit was in operation and the coatings and inks were vented to the catalytic incinerator;

h. the total uncontrolled VOC emission rate from all coatings, inks, and cleanup materials, in pounds per day (i.e., the sum of (b)x(c) for all coatings and inks plus the sum of (e)x(f) for all cleanup materials);

i. the calculated, controlled VOC emission rate from all coatings, inks, and cleanup materials, in tons (the controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance); and

j. the average hourly controlled VOC emission rate, in pounds per hour.

III. Monitoring and/or Record Keeping Requirements (continued)

4. The permitttee shall collect and record the following information on a daily basis for this emissions unit for all periods of time during which the coatings and inks are not vented to the catalytic incinerator:

a. the name and identification number of each coating and ink, as applied;

b. the VOC content of each coating and ink, as applied, in pounds per gallon and in pounds per gallon, excluding water and exempt solvents;

c. the number of gallons of each coating and ink employed;

d. the name and identification of each cleanup material employed;

e. the number of gallons of each cleanup material employed;

f. the VOC content of each cleanup material, in pounds per gallon;

g. the total number of hours the emissions unit was in operation and the coatings and inks were not vented to the catalytic incinerator;

h. the total uncontrolled VOC emission rate from all coatings, inks, and cleanup materials, in pounds per day (i.e., the sum of (b)x(c) for all coatings and inks plus the sum of (e)x(f) for all cleanup materials); and

i. the average hourly VOC emission rate, in pounds per hour.

5. The permittee shall also record, on a daily basis, all periods of time when this emissions unit was in operation and employing coatings and/or inks that contained more than 1.14 pounds of VOC per gallon, excluding water and exempt solvents, and the emissions from such coatings and/or inks were not vented to the catalytic incinerator.

6. The permittee shall record, on a monthly basis, the total VOC emissions from this emissions unit (i.e., the sum of the daily values from sections A.III.3.i and A.III.4.h), the total VOC emissions from emissions units K001 through K009, and the rolling, 12-month summation of the total VOC emissions from emissions units K001 through K009.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the average hourly VOC emissions from the coatings, inks, and cleanup materials exceeded 6.25 lbs/hr, and the actual average hourly VOC emissions for each such day.

2. The permittee shall submit quarterly deviation (excursion) reports that identify all 3-hour blocks of time when the emissions unit was in operation during which the average temperature of the exhaust gases immediately before the catalyst bed or the average temperature difference across the catalyst bed does not comply with the temperature limitation specified above.

3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month VOC limitation of 249.0 tpy for emissions units K001 through K009, combined.

4. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time when this emissions unit was in operation and employing coatings and/or inks that contained more than 1.14 pounds of VOC per gallon, excluding water and exempt solvents, and the emissions from such coatings and/or inks were not vented to the catalytic incinerator.

5. The permittee shall also submit annual reports that specify the total VOC emissions from emissions units K001 through K009 for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

1.a Emission Limitation:

6.25 lbs/hr of VOC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III and the testing requirements specified in section A.V.2.

USEPA Method 24 or 24A shall be used to determine the VOC content of each coating and ink. Formulation data shall be used to determine the VOC content of each cleanup material.

1.b Emission Limitation:

249.0 tpy of VOC as a rolling, 12-month summation for emissions units K001 through K009, combined

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.

1.c Emission Limitation:

75% overall control efficiency

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing requirements specified in section A.V.2.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted within 3 months after issuance of the permit and within 6 months prior to permit expiration.

b. The emission testing shall be conducted to demonstrate compliance with the allowable hourly mass emission limitation for VOC and the overall control efficiency limitation for the catalytic incinerator.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission limitation for VOC and the overall control efficiency limitation for the catalytic incinerator: Methods 1 through 4 and 25 or 25A of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA. The test method and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

d. The test(s) shall be conducted while all emissions units vented to the incinerator are operating at or near their maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

e. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases."

V. Testing Requirements (continued)

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

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

VI. Miscellaneous Requirements

1. The permittee shall comply with the P-MACT regulation for Product & Packaging Rotogravure Printing once the standard becomes effective.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: LAMINATOR #2 (K002)

Activity Description: FOIL PAPER LAMINATOR WITH ONE GRAVURE ROLL COATING/PRINTING STATION

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
packaging rotogravure printing line controlled with a catalytic incinerator - foil paper laminator #2	OAC rule 3745-31-05(A)(3) (PTI 06-4083)	37.5 lbs/hr of volatile organic compounds (VOC), including cleanup materials
		minimum 75% overall control efficiency
		249.0 tpy of VOC emissions for emissions units K001 through K009, as a rolling, 12-month summation
	OAC rule 3745-21-09(Y)	See A.I.2.a below.

2. Additional Terms and Conditions

2.a The VOC emission limitation required by OAC rule 3745-21-09(Y) is less stringent than the VOC emission limitations established pursuant to the best available technology requirement specified in OAC rule 3745-31-05.

II. Operational Restrictions

1. This emissions unit shall be vented to the catalytic incinerator whenever any coating or ink is employed that contains more than 1.14 pounds of VOC per gallon, excluding water and exempt solvents.

2. The average temperature of the process vent stream immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance.

3. The average temperature difference across the catalyst bed at maximum operating capacity, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 80 percent of the average temperature difference during the most recent performance test that demonstrated the emissions unit was in compliance.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain continuous temperature monitors and recorder(s) which measure and record(s) the temperature immediately upstream and downstream of the incinerator's catalyst bed when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorder(s) shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

2. The permittee shall collect and record the following information for each day for the control equipment:

a. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance;

b. all 3-hour blocks of time (when the emissions unit was operating at maximum capacity) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent performance test that demonstrated the emissions unit was in compliance; and

c. a log of the downtime for the capture (collection) system, control device, and monitoring equipment when the associated emissions unit was in operation.

3. The permitttee shall collect and record the following information on a daily basis for this emissions unit for all periods of time during which the coatings and inks are vented to the catalytic incinerator:

a. the name and identification number of each coating and ink, as applied;

b. the VOC content of each coating and ink, as applied, in pounds per gallon;

c. the number of gallons of each coating and ink employed;

d. the name and identification of each cleanup material employed;

e. the number of gallons of each cleanup material employed;

f. the VOC content of each cleanup material, in pounds per gallon;

g. the total number of hours the emissions unit was in operation and the coatings and inks were vented to the catalytic incinerator;

h. the total uncontrolled VOC emission rate from all coatings, inks, and cleanup materials, in pounds per day (i.e., the sum of (b)x(c) for all coatings and inks plus the sum of (e)x(f) for all cleanup materials);

i. the calculated, controlled VOC emission rate from all coatings, inks, and cleanup materials, in tons (the controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance); and

j. the average hourly controlled VOC emission rate, in pounds per hour.

III. Monitoring and/or Record Keeping Requirements (continued)

4. The permitttee shall collect and record the following information on a daily basis for this emissions unit for all periods of time during which the coatings and inks are not vented to the catalytic incinerator:

a. the name and identification number of each coating and ink, as applied;

b. the VOC content of each coating and ink, as applied, in pounds per gallon and in pounds per gallon, excluding water and exempt solvents;

c. the number of gallons of each coating and ink employed;

d. the name and identification of each cleanup material employed;

e. the number of gallons of each cleanup material employed;

f. the VOC content of each cleanup material, in pounds per gallon;

g. the total number of hours the emissions unit was in operation and the coatings and inks were not vented to the catalytic incinerator;

h. the total uncontrolled VOC emission rate from all coatings, inks, and cleanup materials, in pounds per day (i.e., the sum of (b)x(c) for all coatings and inks plus the sum of (e)x(f) for all cleanup materials); and

i. the average hourly VOC emission rate, in pounds per hour.

5. The permittee shall also record, on a daily basis, all periods of time when this emissions unit was in operation and employing coatings and/or inks that contained more than 1.14 pounds of VOC per gallon, excluding water and exempt solvents, and the emissions from such coatings and/or inks were not vented to the catalytic incinerator.

6. The permittee shall record, on a monthly basis, the total VOC emissions from this emissions unit (i.e., the sum of the daily values from sections A.III.3.i and A.III.4.h), the total VOC emissions from emissions units K001 through K009, and the rolling, 12-month summation of the total VOC emissions from emissions units K001 through K009.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the average hourly VOC emissions from the coatings, inks, and cleanup materials exceeded 37.5 lbs/hr, and the actual average hourly VOC emissions for each such day.

2. The permittee shall submit quarterly deviation (excursion) reports that identify all 3-hour blocks of time when the emissions unit was in operation during which the average temperature of the exhaust gases immediately before the catalyst bed or the average temperature difference across the catalyst bed does not comply with the temperature limitation specified above.

3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month VOC limitation of 249.0 tpy for emissions units K001 through K009, combined.

4. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time when this emissions unit was in operation and employing coatings and/or inks that contained more than 1.14 pounds of VOC per gallon, excluding water and exempt solvents, and the emissions from such coatings and/or inks were not vented to the catalytic incinerator.

5. The permittee shall also submit annual reports that specify the total VOC emissions from emissions units K001 through K009 for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

1.a Emission Limitation:

6.25 lbs/hr of VOC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III and the testing requirements specified in section A.V.2.

USEPA Method 24 or 24A shall be used to determine the VOC content of each coating and ink. Formulation data shall be used to determine the VOC content of each cleanup material.

1.b Emission Limitation:

249.0 tpy of VOC as a rolling, 12-month summation for emissions units K001 through K009, combined

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.

1.c Emission Limitation:

75% overall control efficiency

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing requirements specified in section A.V.2.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted within 3 months after issuance of the permit and within 6 months prior to permit expiration.

b. The emission testing shall be conducted to demonstrate compliance with the allowable hourly mass emission limitation for VOC and the overall control efficiency limitation for the catalytic incinerator.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission limitation for VOC and the overall control efficiency limitation for the catalytic incinerator: Methods 1 through 4 and 25 or 25A of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA. The test method and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

d. The test(s) shall be conducted while all emissions units vented to the incinerator are operating at or near their maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

e. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases."

V. Testing Requirements (continued)

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

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

VI. Miscellaneous Requirements

1. The permittee shall comply with the P-MACT regulation for Product & Packaging Rotogravure Printing once the standard becomes effective.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: LAMINATOR #3 (K003)

Activity Description: FOIL PAPER LAMINATOR WITH ONE GRAVURE ROLL COATING/PRINTING STATION

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
packaging rotogravure printing line controlled with a catalytic incinerator - foil paper laminator #3	OAC rule 3745-31-05(A)(3) (PTI 06-4083)	75.0 lbs/hr of volatile organic compounds (VOC), including cleanup materials
		minimum 75% overall control efficiency
		249.0 tpy of VOC emissions for emissions units K001 through K009, as a rolling, 12-month summation
	OAC rule 3745-21-09(Y)	See A.I.2.a below.

2. Additional Terms and Conditions

2.a The VOC emission limitation required by OAC rule 3745-21-09(Y) is less stringent than the VOC emission limitations established pursuant to the best available technology requirement specified in OAC rule 3745-31-05.

II. Operational Restrictions

1. This emissions unit shall be vented to the catalytic incinerator whenever any coating or ink is employed that contains more than 1.14 pounds of VOC per gallon, excluding water and exempt solvents.

2. The average temperature of the process vent stream immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance.

3. The average temperature difference across the catalyst bed at maximum operating capacity, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 80 percent of the average temperature difference during the most recent performance test that demonstrated the emissions unit was in compliance.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain continuous temperature monitors and recorder(s) which measure and record(s) the temperature immediately upstream and downstream of the incinerator's catalyst bed when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorder(s) shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

2. The permittee shall collect and record the following information for each day for the control equipment:

a. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance;

b. all 3-hour blocks of time (when the emissions unit was operating at maximum capacity) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent performance test that demonstrated the emissions unit was in compliance; and

c. a log of the downtime for the capture (collection) system, control device, and monitoring equipment when the associated emissions unit was in operation.

3. The permitttee shall collect and record the following information on a daily basis for this emissions unit for all periods of time during which the coatings and inks are vented to the catalytic incinerator:

a. the name and identification number of each coating and ink, as applied;

b. the VOC content of each coating and ink, as applied, in pounds per gallon;

c. the number of gallons of each coating and ink employed;

d. the name and identification of each cleanup material employed;

e. the number of gallons of each cleanup material employed;

f. the VOC content of each cleanup material, in pounds per gallon;

g. the total number of hours the emissions unit was in operation and the coatings and inks were vented to the catalytic incinerator;

h. the total uncontrolled VOC emission rate from all coatings, inks, and cleanup materials, in pounds per day (i.e., the sum of (b)x(c) for all coatings and inks plus the sum of (e)x(f) for all cleanup materials);

i. the calculated, controlled VOC emission rate from all coatings, inks, and cleanup materials, in tons (the controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance); and

j. the average hourly controlled VOC emission rate, in pounds per hour.

III. Monitoring and/or Record Keeping Requirements (continued)

4. The permitttee shall collect and record the following information on a daily basis for this emissions unit for all periods of time during which the coatings and inks are not vented to the catalytic incinerator:

a. the name and identification number of each coating and ink, as applied;

b. the VOC content of each coating and ink, as applied, in pounds per gallon and in pounds per gallon, excluding water and exempt solvents;

c. the number of gallons of each coating and ink employed;

d. the name and identification of each cleanup material employed;

e. the number of gallons of each cleanup material employed;

f. the VOC content of each cleanup material, in pounds per gallon;

g. the total number of hours the emissions unit was in operation and the coatings and inks were not vented to the catalytic incinerator;

h. the total uncontrolled VOC emission rate from all coatings, inks, and cleanup materials, in pounds per day (i.e., the sum of (b)x(c) for all coatings and inks plus the sum of (e)x(f) for all cleanup materials); and

i. the average hourly VOC emission rate, in pounds per hour.

5. The permittee shall also record, on a daily basis, all periods of time when this emissions unit was in operation and employing coatings and/or inks that contained more than 1.14 pounds of VOC per gallon, excluding water and exempt solvents, and the emissions from such coatings and/or inks were not vented to the catalytic incinerator.

6. The permittee shall record, on a monthly basis, the total VOC emissions from this emissions unit (i.e., the sum of the daily values from sections A.III.3.i and A.III.4.h), the total VOC emissions from emissions units K001 through K009, and the rolling, 12-month summation of the total VOC emissions from emissions units K001 through K009.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the average hourly VOC emissions from the coatings, inks, and cleanup materials exceeded 75.0 lbs/hr, and the actual average hourly VOC emissions for each such day.

2. The permittee shall submit quarterly deviation (excursion) reports that identify all 3-hour blocks of time when the emissions unit was in operation during which the average temperature of the exhaust gases immediately before the catalyst bed or the average temperature difference across the catalyst bed does not comply with the temperature limitation specified above.

3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month VOC limitation of 249.0 tpy for emissions units K001 through K009, combined.

4. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time when this emissions unit was in operation and employing coatings and/or inks that contained more than 1.14 pounds of VOC per gallon, excluding water and exempt solvents, and the emissions from such coatings and/or inks were not vented to the catalytic incinerator.

5. The permittee shall also submit annual reports that specify the total VOC emissions from emissions units K001 through K009 for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

1.a Emission Limitation:

6.25 lbs/hr of VOC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III and the testing requirements specified in section A.V.2.

USEPA Method 24 or 24A shall be used to determine the VOC content of each coating and ink. Formulation data shall be used to determine the VOC content of each cleanup material.

1.b Emission Limitation:

249.0 tpy of VOC as a rolling, 12-month summation for emissions units K001 through K009, combined

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.

1.c Emission Limitation:

75% overall control efficiency

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing requirements specified in section A.V.2.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted within 3 months after issuance of the permit and within 6 months prior to permit expiration.

b. The emission testing shall be conducted to demonstrate compliance with the allowable hourly mass emission limitation for VOC and the overall control efficiency limitation for the catalytic incinerator.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission limitation for VOC and the overall control efficiency limitation for the catalytic incinerator: Methods 1 through 4 and 25 or 25A of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA. The test method and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

d. The test(s) shall be conducted while all emissions units vented to the incinerator are operating at or near their maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

e. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases."

V. Testing Requirements (continued)

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

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

VI. Miscellaneous Requirements

1. The permittee shall comply with the P-MACT regulation for Product & Packaging Rotogravure Printing once the standard becomes effective.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: LAMINATOR #4 (K004)

Activity Description: FOIL PAPER LAMINATOR WITH ONE GRAVURE ROLL COATING/PRINTING STATION

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
packaging rotogravure printing line controlled with a catalytic incinerator - foil paper laminator #4	OAC rule 3745-31-05(A)(3) (PTI 06-4083)	62.5 lbs/hr of volatile organic compounds (VOC), including cleanup materials
		minimum 75% overall control efficiency
		249.0 tpy of VOC emissions for emissions units K001 through K009, as a rolling, 12-month summation
	OAC rule 3745-21-09(Y)	See A.I.2.a below.

2. Additional Terms and Conditions

2.a The VOC emission limitation required by OAC rule 3745-21-09(Y) is less stringent than the VOC emission limitations established pursuant to the best available technology requirement specified in OAC rule 3745-31-05.

II. Operational Restrictions

1. This emissions unit shall be vented to the catalytic incinerator whenever any coating or ink is employed that contains more than 1.14 pounds of VOC per gallon, excluding water and exempt solvents.

2. The average temperature of the process vent stream immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance.

3. The average temperature difference across the catalyst bed at maximum operating capacity, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 80 percent of the average temperature difference during the most recent performance test that demonstrated the emissions unit was in compliance.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain continuous temperature monitors and recorder(s) which measure and record(s) the temperature immediately upstream and downstream of the incinerator's catalyst bed when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorder(s) shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

2. The permittee shall collect and record the following information for each day for the control equipment:

a. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance;

b. all 3-hour blocks of time (when the emissions unit was operating at maximum capacity) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent performance test that demonstrated the emissions unit was in compliance; and

c. a log of the downtime for the capture (collection) system, control device, and monitoring equipment when the associated emissions unit was in operation.

3. The permitttee shall collect and record the following information on a daily basis for this emissions unit for all periods of time during which the coatings and inks are vented to the catalytic incinerator:

a. the name and identification number of each coating and ink, as applied;

b. the VOC content of each coating and ink, as applied, in pounds per gallon;

c. the number of gallons of each coating and ink employed;

d. the name and identification of each cleanup material employed;

e. the number of gallons of each cleanup material employed;

f. the VOC content of each cleanup material, in pounds per gallon;

g. the total number of hours the emissions unit was in operation and the coatings and inks were vented to the catalytic incinerator;

h. the total uncontrolled VOC emission rate from all coatings, inks, and cleanup materials, in pounds per day (i.e., the sum of (b)x(c) for all coatings and inks plus the sum of (e)x(f) for all cleanup materials);

i. the calculated, controlled VOC emission rate from all coatings, inks, and cleanup materials, in tons (the controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance); and

j. the average hourly controlled VOC emission rate, in pounds per hour.

III. Monitoring and/or Record Keeping Requirements (continued)

4. The permitttee shall collect and record the following information on a daily basis for this emissions unit for all periods of time during which the coatings and inks are not vented to the catalytic incinerator:

a. the name and identification number of each coating and ink, as applied;

b. the VOC content of each coating and ink, as applied, in pounds per gallon and in pounds per gallon, excluding water and exempt solvents;

c. the number of gallons of each coating and ink employed;

d. the name and identification of each cleanup material employed;

e. the number of gallons of each cleanup material employed;

f. the VOC content of each cleanup material, in pounds per gallon;

g. the total number of hours the emissions unit was in operation and the coatings and inks were not vented to the catalytic incinerator;

h. the total uncontrolled VOC emission rate from all coatings, inks, and cleanup materials, in pounds per day (i.e., the sum of (b)x(c) for all coatings and inks plus the sum of (e)x(f) for all cleanup materials); and

i. the average hourly VOC emission rate, in pounds per hour.

5. The permittee shall also record, on a daily basis, all periods of time when this emissions unit was in operation and employing coatings and/or inks that contained more than 1.14 pounds of VOC per gallon, excluding water and exempt solvents, and the emissions from such coatings and/or inks were not vented to the catalytic incinerator.

6. The permittee shall record, on a monthly basis, the total VOC emissions from this emissions unit (i.e., the sum of the daily values from sections A.III.3.i and A.III.4.h), the total VOC emissions from emissions units K001 through K009, and the rolling, 12-month summation of the total VOC emissions from emissions units K001 through K009.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the average hourly VOC emissions from the coatings, inks, and cleanup materials exceeded 62.5 lbs/hr, and the actual average hourly VOC emissions for each such day.

2. The permittee shall submit quarterly deviation (excursion) reports that identify all 3-hour blocks of time when the emissions unit was in operation during which the average temperature of the exhaust gases immediately before the catalyst bed or the average temperature difference across the catalyst bed does not comply with the temperature limitation specified above.

3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month VOC limitation of 249.0 tpy for emissions units K001 through K009, combined.

4. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time when this emissions unit was in operation and employing coatings and/or inks that contained more than 1.14 pounds of VOC per gallon, excluding water and exempt solvents, and the emissions from such coatings and/or inks were not vented to the catalytic incinerator.

5. The permittee shall also submit annual reports that specify the total VOC emissions from emissions units K001 through K009 for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

1.a Emission Limitation:

6.25 lbs/hr of VOC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III and the testing requirements specified in section A.V.2.

USEPA Method 24 or 24A shall be used to determine the VOC content of each coating and ink. Formulation data shall be used to determine the VOC content of each cleanup material.

1.b Emission Limitation:

249.0 tpy of VOC as a rolling, 12-month summation for emissions units K001 through K009, combined

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.

1.c Emission Limitation:

75% overall control efficiency

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing requirements specified in section A.V.2.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted within 3 months after issuance of the permit and within 6 months prior to permit expiration.

b. The emission testing shall be conducted to demonstrate compliance with the allowable hourly mass emission limitation for VOC and the overall control efficiency limitation for the catalytic incinerator.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission limitation for VOC and the overall control efficiency limitation for the catalytic incinerator: Methods 1 through 4 and 25 or 25A of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA. The test method and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

d. The test(s) shall be conducted while all emissions units vented to the incinerator are operating at or near their maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

e. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases."

V. Testing Requirements (continued)

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

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

VI. Miscellaneous Requirements

1. The permittee shall comply with the P-MACT regulation for Product & Packaging Rotogravure Printing once the standard becomes effective.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: LAMINATOR #5 (K005)

Activity Description: FOIL GRAVURE ROLL COATING/PRINTING STATION

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
packaging rotogravure printing line controlled with a catalytic incinerator - foil paper laminator #5	OAC rule 3745-31-05(A)(3) (PTI 06-4083)	62.5 lbs/hr of volatile organic compounds (VOC), including cleanup materials
		minimum 75% overall control efficiency
		249.0 tpy of VOC emissions for emissions units K001 through K009, as a rolling, 12-month summation
	OAC rule 3745-21-09(Y)	See A.I.2.a below.

2. Additional Terms and Conditions

2.a The VOC emission limitation required by OAC rule 3745-21-09(Y) is less stringent than the VOC emission limitations established pursuant to the best available technology requirement specified in OAC rule 3745-31-05.

II. Operational Restrictions

1. This emissions unit shall be vented to the catalytic incinerator whenever any coating or ink is employed that contains more than 1.14 pounds of VOC per gallon, excluding water and exempt solvents.

2. The average temperature of the process vent stream immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance.

3. The average temperature difference across the catalyst bed at maximum operating capacity, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 80 percent of the average temperature difference during the most recent performance test that demonstrated the emissions unit was in compliance.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain continuous temperature monitors and recorder(s) which measure and record(s) the temperature immediately upstream and downstream of the incinerator's catalyst bed when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorder(s) shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

2. The permittee shall collect and record the following information for each day for the control equipment:

a. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance;

b. all 3-hour blocks of time (when the emissions unit was operating at maximum capacity) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent performance test that demonstrated the emissions unit was in compliance; and

c. a log of the downtime for the capture (collection) system, control device, and monitoring equipment when the associated emissions unit was in operation.

3. The permitttee shall collect and record the following information on a daily basis for this emissions unit for all periods of time during which the coatings and inks are vented to the catalytic incinerator:

a. the name and identification number of each coating and ink, as applied;

b. the VOC content of each coating and ink, as applied, in pounds per gallon;

c. the number of gallons of each coating and ink employed;

d. the name and identification of each cleanup material employed;

e. the number of gallons of each cleanup material employed;

f. the VOC content of each cleanup material, in pounds per gallon;

g. the total number of hours the emissions unit was in operation and the coatings and inks were vented to the catalytic incinerator;

h. the total uncontrolled VOC emission rate from all coatings, inks, and cleanup materials, in pounds per day (i.e., the sum of (b)x(c) for all coatings and inks plus the sum of (e)x(f) for all cleanup materials);

i. the calculated, controlled VOC emission rate from all coatings, inks, and cleanup materials, in tons (the controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance); and

j. the average hourly controlled VOC emission rate, in pounds per hour.

III. Monitoring and/or Record Keeping Requirements (continued)

4. The permitttee shall collect and record the following information on a daily basis for this emissions unit for all periods of time during which the coatings and inks are not vented to the catalytic incinerator:

a. the name and identification number of each coating and ink, as applied;

b. the VOC content of each coating and ink, as applied, in pounds per gallon and in pounds per gallon, excluding water and exempt solvents;

c. the number of gallons of each coating and ink employed;

d. the name and identification of each cleanup material employed;

e. the number of gallons of each cleanup material employed;

f. the VOC content of each cleanup material, in pounds per gallon;

g. the total number of hours the emissions unit was in operation and the coatings and inks were not vented to the catalytic incinerator;

h. the total uncontrolled VOC emission rate from all coatings, inks, and cleanup materials, in pounds per day (i.e., the sum of (b)x(c) for all coatings and inks plus the sum of (e)x(f) for all cleanup materials); and

i. the average hourly VOC emission rate, in pounds per hour.

5. The permittee shall also record, on a daily basis, all periods of time when this emissions unit was in operation and employing coatings and/or inks that contained more than 1.14 pounds of VOC per gallon, excluding water and exempt solvents, and the emissions from such coatings and/or inks were not vented to the catalytic incinerator.

6. The permittee shall record, on a monthly basis, the total VOC emissions from this emissions unit (i.e., the sum of the daily values from sections A.III.3.i and A.III.4.h), the total VOC emissions from emissions units K001 through K009, and the rolling, 12-month summation of the total VOC emissions from emissions units K001 through K009.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the average hourly VOC emissions from the coatings, inks, and cleanup materials exceeded 62.5 lbs/hr, and the actual average hourly VOC emissions for each such day.

2. The permittee shall submit quarterly deviation (excursion) reports that identify all 3-hour blocks of time when the emissions unit was in operation during which the average temperature of the exhaust gases immediately before the catalyst bed or the average temperature difference across the catalyst bed does not comply with the temperature limitation specified above.

3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month VOC limitation of 249.0 tpy for emissions units K001 through K009, combined.

4. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time when this emissions unit was in operation and employing coatings and/or inks that contained more than 1.14 pounds of VOC per gallon, excluding water and exempt solvents, and the emissions from such coatings and/or inks were not vented to the catalytic incinerator.

5. The permittee shall also submit annual reports that specify the total VOC emissions from emissions units K001 through K009 for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

1.a Emission Limitation:

6.25 lbs/hr of VOC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III and the testing requirements specified in section A.V.2.

USEPA Method 24 or 24A shall be used to determine the VOC content of each coating and ink. Formulation data shall be used to determine the VOC content of each cleanup material.

1.b Emission Limitation:

249.0 tpy of VOC as a rolling, 12-month summation for emissions units K001 through K009, combined

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.

1.c Emission Limitation:

75% overall control efficiency

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing requirements specified in section A.V.2.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted within 3 months after issuance of the permit and within 6 months prior to permit expiration.

b. The emission testing shall be conducted to demonstrate compliance with the allowable hourly mass emission limitation for VOC and the overall control efficiency limitation for the catalytic incinerator.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission limitation for VOC and the overall control efficiency limitation for the catalytic incinerator: Methods 1 through 4 and 25 or 25A of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA. The test method and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

d. The test(s) shall be conducted while all emissions units vented to the incinerator are operating at or near their maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

e. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases."

V. Testing Requirements (continued)

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

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

VI. Miscellaneous Requirements

1. The permittee shall comply with the P-MACT regulation for Product & Packaging Rotogravure Printing once the standard becomes effective.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: FLEXOGRAPHIC PRESS#1 (K006)

Activity Description: 3 COLOR FLEXOGRAPHIC PRINTING PRESS COATING/PRINTING STATION

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
flexographic printing line controlled with a catalytic incinerator - flexographic press #1	OAC rule 3745-31-05(A)(3) (PTI 06-4083)	3.0 lbs/hr of volatile organic compounds (VOC), including cleanup materials
		minimum 75% overall control efficiency
		249.0 tpy of VOC emissions for emissions units K001 through K009, as a rolling, 12-month summation
	OAC rule 3745-21-09(Y)	See A.I.2.a below.

2. Additional Terms and Conditions

2.a The VOC emission limitation required by OAC rule 3745-21-09(Y) is less stringent than the VOC emission limitations established pursuant to the best available technology requirement specified in OAC rule 3745-31-05.

II. Operational Restrictions

1. This emissions unit shall be vented to the catalytic incinerator whenever any coating or ink is employed that contains more than 1.14 pounds of VOC per gallon, excluding water and exempt solvents.

2. The average temperature of the process vent stream immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance.

3. The average temperature difference across the catalyst bed at maximum operating capacity, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 80 percent of the average temperature difference during the most recent performance test that demonstrated the emissions unit was in compliance.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain continuous temperature monitors and recorder(s) which measure and record(s) the temperature immediately upstream and downstream of the incinerator's catalyst bed when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorder(s) shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

2. The permittee shall collect and record the following information for each day for the control equipment:

a. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance;

b. all 3-hour blocks of time (when the emissions unit was operating at maximum capacity) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent performance test that demonstrated the emissions unit was in compliance; and

c. a log of the downtime for the capture (collection) system, control device, and monitoring equipment when the associated emissions unit was in operation.

3. The permitttee shall collect and record the following information on a daily basis for this emissions unit for all periods of time during which the coatings and inks are vented to the catalytic incinerator:

a. the name and identification number of each coating and ink, as applied;

b. the VOC content of each coating and ink, as applied, in pounds per gallon;

c. the number of gallons of each coating and ink employed;

d. the name and identification of each cleanup material employed;

e. the number of gallons of each cleanup material employed;

f. the VOC content of each cleanup material, in pounds per gallon;

g. the total number of hours the emissions unit was in operation and the coatings and inks were vented to the catalytic incinerator;

h. the total uncontrolled VOC emission rate from all coatings, inks, and cleanup materials, in pounds per day (i.e., the sum of (b)x(c) for all coatings and inks plus the sum of (e)x(f) for all cleanup materials);

i. the calculated, controlled VOC emission rate from all coatings, inks, and cleanup materials, in tons (the controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance); and

j. the average hourly controlled VOC emission rate, in pounds per hour.

III. Monitoring and/or Record Keeping Requirements (continued)

4. The permitttee shall collect and record the following information on a daily basis for this emissions unit for all periods of time during which the coatings and inks are not vented to the catalytic incinerator:

a. the name and identification number of each coating and ink, as applied;

b. the VOC content of each coating and ink, as applied, in pounds per gallon and in pounds per gallon, excluding water and exempt solvents;

c. the number of gallons of each coating and ink employed;

d. the name and identification of each cleanup material employed;

e. the number of gallons of each cleanup material employed;

f. the VOC content of each cleanup material, in pounds per gallon;

g. the total number of hours the emissions unit was in operation and the coatings and inks were not vented to the catalytic incinerator;

h. the total uncontrolled VOC emission rate from all coatings, inks, and cleanup materials, in pounds per day (i.e., the sum of (b)x(c) for all coatings and inks plus the sum of (e)x(f) for all cleanup materials); and

i. the average hourly VOC emission rate, in pounds per hour.

5. The permittee shall also record, on a daily basis, all periods of time when this emissions unit was in operation and employing coatings and/or inks that contained more than 1.14 pounds of VOC per gallon, excluding water and exempt solvents, and the emissions from such coatings and/or inks were not vented to the catalytic incinerator.

6. The permittee shall record, on a monthly basis, the total VOC emissions from this emissions unit (i.e., the sum of the daily values from sections A.III.3.i and A.III.4.h), the total VOC emissions from emissions units K001 through K009, and the rolling, 12-month summation of the total VOC emissions from emissions units K001 through K009.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the average hourly VOC emissions from the coatings, inks, and cleanup materials exceeded 3.0 lbs/hr, and the actual average hourly VOC emissions for each such day.

2. The permittee shall submit quarterly deviation (excursion) reports that identify all 3-hour blocks of time when the emissions unit was in operation during which the average temperature of the exhaust gases immediately before the catalyst bed or the average temperature difference across the catalyst bed does not comply with the temperature limitation specified above.

3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month VOC limitation of 249.0 tpy for emissions units K001 through K009, combined.

4. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time when this emissions unit was in operation and employing coatings and/or inks that contained more than 1.14 pounds of VOC per gallon, excluding water and exempt solvents, and the emissions from such coatings and/or inks were not vented to the catalytic incinerator.

5. The permittee shall also submit annual reports that specify the total VOC emissions from emissions units K001 through K009 for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

1.a Emission Limitation:

6.25 lbs/hr of VOC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III and the testing requirements specified in section A.V.2.

USEPA Method 24 or 24A shall be used to determine the VOC content of each coating and ink. Formulation data shall be used to determine the VOC content of each cleanup material.

1.b Emission Limitation:

249.0 tpy of VOC as a rolling, 12-month summation for emissions units K001 through K009, combined

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.

1.c Emission Limitation:

75% overall control efficiency

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing requirements specified in section A.V.2.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted within 3 months after issuance of the permit and within 6 months prior to permit expiration.

b. The emission testing shall be conducted to demonstrate compliance with the allowable hourly mass emission limitation for VOC and the overall control efficiency limitation for the catalytic incinerator.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission limitation for VOC and the overall control efficiency limitation for the catalytic incinerator: Methods 1 through 4 and 25 or 25A of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA. The test method and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

d. The test(s) shall be conducted while all emissions units vented to the incinerator are operating at or near their maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

e. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases."

V. Testing Requirements (continued)

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: FLEXOGRAPHIC PRESS#2 (K007)

Activity Description: 5 COLOR FLEXOGRAPHIC PRINTING PRESS COATING/PRINTING STATION

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
flexographic printing line controlled with a catalytic incinerator - flexographic press #2	OAC rule 3745-31-05(A)(3) (PTI 06-4083)	3.0 lbs/hr of volatile organic compounds (VOC), including cleanup materials
		minimum 75% overall control efficiency
		249.0 tpy of VOC emissions for emissions units K001 through K009, as a rolling, 12-month summation
	OAC rule 3745-21-09(Y)	See A.I.2.a below.

2. Additional Terms and Conditions

2.a The VOC emission limitation required by OAC rule 3745-21-09(Y) is less stringent than the VOC emission limitations established pursuant to the best available technology requirement specified in OAC rule 3745-31-05.

II. Operational Restrictions

1. This emissions unit shall be vented to the catalytic incinerator whenever any coating or ink is employed that contains more than 1.14 pounds of VOC per gallon, excluding water and exempt solvents.

2. The average temperature of the process vent stream immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance.

3. The average temperature difference across the catalyst bed at maximum operating capacity, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 80 percent of the average temperature difference during the most recent performance test that demonstrated the emissions unit was in compliance.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain continuous temperature monitors and recorder(s) which measure and record(s) the temperature immediately upstream and downstream of the incinerator's catalyst bed when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorder(s) shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

2. The permittee shall collect and record the following information for each day for the control equipment:

a. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance;

b. all 3-hour blocks of time (when the emissions unit was operating at maximum capacity) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent performance test that demonstrated the emissions unit was in compliance; and

c. a log of the downtime for the capture (collection) system, control device, and monitoring equipment when the associated emissions unit was in operation.

3. The permitttee shall collect and record the following information on a daily basis for this emissions unit for all periods of time during which the coatings and inks are vented to the catalytic incinerator:

a. the name and identification number of each coating and ink, as applied;

b. the VOC content of each coating and ink, as applied, in pounds per gallon;

c. the number of gallons of each coating and ink employed;

d. the name and identification of each cleanup material employed;

e. the number of gallons of each cleanup material employed;

f. the VOC content of each cleanup material, in pounds per gallon;

g. the total number of hours the emissions unit was in operation and the coatings and inks were vented to the catalytic incinerator;

h. the total uncontrolled VOC emission rate from all coatings, inks, and cleanup materials, in pounds per day (i.e., the sum of (b)x(c) for all coatings and inks plus the sum of (e)x(f) for all cleanup materials);

i. the calculated, controlled VOC emission rate from all coatings, inks, and cleanup materials, in tons (the controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance); and

j. the average hourly controlled VOC emission rate, in pounds per hour.

III. Monitoring and/or Record Keeping Requirements (continued)

4. The permitttee shall collect and record the following information on a daily basis for this emissions unit for all periods of time during which the coatings and inks are not vented to the catalytic incinerator:

a. the name and identification number of each coating and ink, as applied;

b. the VOC content of each coating and ink, as applied, in pounds per gallon and in pounds per gallon, excluding water and exempt solvents;

c. the number of gallons of each coating and ink employed;

d. the name and identification of each cleanup material employed;

e. the number of gallons of each cleanup material employed;

f. the VOC content of each cleanup material, in pounds per gallon;

g. the total number of hours the emissions unit was in operation and the coatings and inks were not vented to the catalytic incinerator;

h. the total uncontrolled VOC emission rate from all coatings, inks, and cleanup materials, in pounds per day (i.e., the sum of (b)x(c) for all coatings and inks plus the sum of (e)x(f) for all cleanup materials); and

i. the average hourly VOC emission rate, in pounds per hour.

5. The permittee shall also record, on a daily basis, all periods of time when this emissions unit was in operation and employing coatings and/or inks that contained more than 1.14 pounds of VOC per gallon, excluding water and exempt solvents, and the emissions from such coatings and/or inks were not vented to the catalytic incinerator.

6. The permittee shall record, on a monthly basis, the total VOC emissions from this emissions unit (i.e., the sum of the daily values from sections A.III.3.i and A.III.4.h), the total VOC emissions from emissions units K001 through K009, and the rolling, 12-month summation of the total VOC emissions from emissions units K001 through K009.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the average hourly VOC emissions from the coatings, inks, and cleanup materials exceeded 3.0 lbs/hr, and the actual average hourly VOC emissions for each such day.

2. The permittee shall submit quarterly deviation (excursion) reports that identify all 3-hour blocks of time when the emissions unit was in operation during which the average temperature of the exhaust gases immediately before the catalyst bed or the average temperature difference across the catalyst bed does not comply with the temperature limitation specified above.

3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month VOC limitation of 249.0 tpy for emissions units K001 through K009, combined.

4. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time when this emissions unit was in operation and employing coatings and/or inks that contained more than 1.14 pounds of VOC per gallon, excluding water and exempt solvents, and the emissions from such coatings and/or inks were not vented to the catalytic incinerator.

5. The permittee shall also submit annual reports that specify the total VOC emissions from emissions units K001 through K009 for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

1.a Emission Limitation:

6.25 lbs/hr of VOC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III and the testing requirements specified in section A.V.2.

USEPA Method 24 or 24A shall be used to determine the VOC content of each coating and ink. Formulation data shall be used to determine the VOC content of each cleanup material.

1.b Emission Limitation:

249.0 tpy of VOC as a rolling, 12-month summation for emissions units K001 through K009, combined

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.

1.c Emission Limitation:

75% overall control efficiency

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing requirements specified in section A.V.2.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted within 3 months after issuance of the permit and within 6 months prior to permit expiration.

b. The emission testing shall be conducted to demonstrate compliance with the allowable hourly mass emission limitation for VOC and the overall control efficiency limitation for the catalytic incinerator.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission limitation for VOC and the overall control efficiency limitation for the catalytic incinerator: Methods 1 through 4 and 25 or 25A of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA. The test method and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

d. The test(s) shall be conducted while all emissions units vented to the incinerator are operating at or near their maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

e. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases."

V. Testing Requirements (continued)

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: FLEXOGRAPHIC PRESS #3 (K008)

Activity Description: 6 COLOR FLEXOGRAPHIC PRINTING PRESS COATING/PRINTING STATION

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
flexographic printing line - flexographic printing press #3	OAC rule 3745-31-05(A)(3) (PTI 06-5146)	3.0 lbs/hr of volatile organic compounds (VOC), including cleanup materials
		249.0 tpy of VOC emissions as a rolling, 12-month summation for emissions units K001 through K009, combined
	OAC rule 3745-21-09(Y)(1)(a)(ii)	The VOC content of each coating and ink shall not exceed 25 percent VOC by volume of the volatile matter.

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. Only waterborne coatings (coatings where water is the continuous phase and which are miscible with water) may be used in this emissions unit.

III. Monitoring and/or Record Keeping Requirements

1. The permitttee shall collect and record the following information on a daily basis for this emissions unit:

a. the name and identification number of each coating and ink, as applied;

b. the VOC content of each coating and ink, in pounds per gallon;

c. the number of gallons of each coating and ink employed;

d. the name and identification of each cleanup material employed;

e. the number of gallons of each cleanup material employed;

f. the VOC content of each cleanup material, in pounds per gallon;

g. the total number of hours the emissions unit is operated;

h. the total uncontrolled VOC emission rate from all coatings and cleanup materials, in pounds per day (i.e., the sum of (b)x(c) for all coatings plus the sum of (e)x(f) for all cleanup materials);

i. the average hourly controlled VOC emission rate, in pounds per hour; and

j. the percentage of VOC, by volume, of the volatile matter contained in each coating and ink.

2. The permittee shall collect and record, on a monthly basis, the total VOC emissions from this emissions unit (i.e., the sum of the daily values from section A.III.1.h), the total VOC emissions from emissions units K001 through K009, and the rolling, 12-month summation of the total VOC emissions from emissions units K001 through K009.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the average hourly VOC emissions from the coatings, inks, and cleanup materials exceeded 3.0 lbs/hr, and the actual average hourly VOC emissions for each such day.

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month VOC limitation of 249.0 tpy for emissions units K001 through K009, combined.

3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings and inks (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar quarter.

4. The permittee shall also submit annual reports that specify the total VOC emissions from emissions units K001 through K009 for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation:

3.0 lbs/hr of VOC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.

V. Testing Requirements (continued)

1.b Emission Limitation:

249.0 tpy of VOC emissions as a rolling, 12-month summation for emissions units K001 through K009, combined

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.

1.c Emission Limitation:

The VOC content of each coating and ink shall not exceed 25 percent VOC by volume of the volatile matter.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the coating and ink suppliers data and the record keeping requirements specified in section A.III.

USEPA Method 24 or 24A shall be used to determine the VOC content of each coating and ink. Formulation data shall be used to determine the VOC content of each cleanup material.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: LAMINATOR # 6 (K009)

Activity Description: FOIL PAPER LAMINATOR WITH ONE GRAVURE ROLL COATING/PRINTING STATION

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
packaging rotogravure printing line controlled with a catalytic incinerator - foil paper laminator #6	OAC rule 3745-31-05(A)(3) (PTI 06-5304)	13.0 lbs/hr and 57 tpy of volatile organic compounds (VOC), including cleanup materials 249.0 tpy of VOC emissions for emissions units K001 through K009, as a rolling, 12-month summation
	OAC rule 3745-21-09(Y)	See A.I.2.a below.

2. Additional Terms and Conditions

2.a The VOC emission limitation required by OAC rule 3745-21-09(Y) is less stringent than the VOC emission limitations established pursuant to the best available technology requirement specified in OAC rule 3745-31-05.

II. Operational Restrictions

1. The average temperature of the process vent stream immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance.

2. The average temperature difference across the catalyst bed at maximum operating capacity, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 80 percent of the average temperature difference during the most recent performance test that demonstrated the emissions unit was in compliance.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain continuous temperature monitors and recorder(s) which measure and record(s) the temperature immediately upstream and downstream of the incinerator's catalyst bed when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorder(s) shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall collect and record the following information for each day for the control equipment:

a. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance;

b. all 3-hour blocks of time (when the emissions unit was operating at maximum capacity) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent performance test that demonstrated the emissions unit was in compliance; and

c. a log of the downtime for the capture (collection) system, control device, and monitoring equipment when the associated emissions unit was in operation.

3. The permitttee shall collect and record the following information on a daily basis for this emissions unit:

a. the name and identification number of each coating and ink, as applied;

b. the VOC content of each coating and ink, as applied, in pounds per gallon;

c. the number of gallons of each coating and ink employed;

d. the name and identification of each cleanup material employed;

e. the number of gallons of each cleanup material employed;

f. the VOC content of each cleanup material, in pounds per gallon;

g. the total number of hours the emissions unit was in operation;

h. the total uncontrolled VOC emission rate from all coatings, inks, and cleanup materials, in pounds per day (i.e., the sum of (b)x(c) for all coatings and inks plus the sum of (e)x(f) for all cleanup materials);

i. the calculated, controlled VOC emission rate from all coatings, inks, and cleanup materials, in tons (the controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance); and

j. the average hourly controlled VOC emission rate, in pounds per hour.

4. The permittee shall record, on a monthly basis, the total VOC emissions from this emissions unit (i.e., the sum of the daily values from section A.III.3.i), the total VOC emissions from emissions units K001 through K009, and the rolling, 12-month summation of the total VOC emissions from emissions units K001 through K009.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the average hourly VOC emissions from the coatings, inks, and cleanup materials exceeded 13.0 lbs/hr, and the actual average hourly VOC emissions for each such day.

2. The permittee shall submit quarterly deviation (excursion) reports that identify all 3-hour blocks of time when the emissions unit was in operation during which the average temperature of the exhaust gases immediately before the catalyst bed or the average temperature difference across the catalyst bed does not comply with the temperature limitation specified above.

3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month VOC limitation of 249.0 tpy for emissions units K001 through K009, combined.

IV. Reporting Requirements (continued)

4. The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit and the total VOC emissions from emissions units K001 through K009 for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation:

13.0 lbs/hr of VOC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III and the testing requirements specified in section A.V.2.

USEPA Method 24 or 24A shall be used to determine the VOC content of each coating and ink. Formulation data shall be used to determine the VOC content of each cleanup material.

1.b Emission Limitation:

57 tpy of VOC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.

1.c Emission Limitation:

249.0 tpy of VOC as a rolling, 12-month summation for emissions units K001 through K009, combined

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted within 3 months after issuance of the permit and within 6 months prior to permit expiration.

b. The emission testing shall be conducted to demonstrate compliance with the allowable hourly mass emission limitation for VOC and to determine the overall control efficiency for the catalytic incinerator.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission limitation for VOC and to determine the overall control efficiency for the catalytic incinerator: Methods 1 through 4 and 25 or 25A of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA. The test method and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

d. The test(s) shall be conducted while all emissions units vented to the incinerator are operating at or near their maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

V. Testing Requirements (continued)

e. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases."

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

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

VI. Miscellaneous Requirements

1. The permittee shall comply with the P-MACT regulation for Product & Packaging Rotogravure Printing once the standard becomes effective.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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