



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

04/24/02

**CERTIFIED MAIL**

**RE: Final Title V Chapter 3745-77 permit**

14-31-17-0674  
Orflex Ltd.  
Daniel E Drudy  
470 Northland Blvd.  
Cincinnati, OH 45240

Dear Daniel E Drudy:

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 Hamilton County Dept. of Environmental Services.

Very truly yours,

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

cc: Hamilton County Dept. of Environmental Services  
File, DAPC PMU



State of Ohio Environmental Protection Agency

**FINAL TITLE V PERMIT**

Issue Date: **04/24/02**

Effective Date: **04/24/02**

Expiration Date: **04/24/07**

This document constitutes issuance of a Title V permit for Facility ID: 14-31-17-0674 to:  
Orflex Ltd.  
250 William Howard Taft Rd  
Cincinnati, OH 45219-2660

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

K004 (CI Press # 3) Flexographic Press / Laminator	K007 (CI Press # 6) Flexographic Press / Laminator	K013 (CI Press # 2) Flexographic Press / Laminator
K005 (CI Press # 4) Flexographic Press / Laminator	K009 (Egan # 31) Extrusion Laminator / Coater	L001 (Parts Washer) Parts Washer
K006 (CI Press # 5) Flexographic Press / Laminator	K010 (Egan # 32) Extrusion Laminator / Coater	

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 3745-77-08(E) 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 current Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

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

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones  
Director

## PART I - GENERAL TERMS AND CONDITIONS

### A. *State and Federally Enforceable Section*

#### 1. **Monitoring and Related Record Keeping 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.  
*(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))*
- 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.  
*(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))*
- 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 record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.  
*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*
  - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and record keeping 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 (in part) of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and the requirements of 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.6 below if no deviations occurred during the quarter.

- (Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii))*
- iii. Written reports, which identify any deviations from the federally enforceable monitoring, record keeping, and reporting requirements 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, record keeping, 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.
- (Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii))*
- 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.
- (Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))*

## **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 condition, of any emissions unit(s) 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 upset conditions.

Except as provided in OAC rule 3745-15-06, 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).

*(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iii))*

## **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.

*(Authority for term: OAC rule 3745-77-07(A)(4))*

## **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.

*(Authority for term: OAC rule 3745-77-07(A)(5))*

## **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.

*(Authority for term: OAC rule 3745-77-07(A)(6))*

## **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, in accordance with A.10 below. 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.

*(Authority for term: OAC rule 3745-77-07(A)(7))*

## **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.

*(Authority for term: OAC rule 3745-77-07(A)(8))*

## **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.

*(Authority for term: OAC rule 3745-77-07(A)(9))*

**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.

*(Authority for term: OAC rule 3745-77-07(A)(10))*

**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 (18) 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.

*(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))*

**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.

*(Authority for term: OAC rule 3745-77-07(B))*

**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 Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA 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.

*(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))*

### **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.

*(Authority for term: OAC rule 3745-77-07(F))*

### **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).

*(Authority for term: OAC rules 3745-77-07(H)(1) and (2))*

### **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.

*(Authority for term: OAC rule 3745-77-07(G))*

### **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 of the U.S. EPA, 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 purposes of clarification, the permittee can refer to Engineering Guide #63 that is available in the STARSHIP software package.)

*(Authority for term: OAC rule 3745-77-07(I))*

#### **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.

*(This term is provided for informational purposes only.)*

#### **18. Insignificant Activities**

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

*(Authority for term: OAC rule 3745-77-07(A)(1))*

#### **19. 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.

*(Authority for term: OAC rule 3745-77-07(A)(1))*

**20. 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.

*(Authority for term: OAC rule 3745-77-07(A)(1))*

**B. State Only Enforceable Section**

**1. Reporting Requirements Related to Monitoring and Record Keeping Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or record keeping 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 record keeping 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.)

**2. 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.

**3. 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.

**4. 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).

**5. 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.

**6. 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 Enforceable Section**

**None**

### **B. State Only Enforceable Section**

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

R001 primary treater on press 4;  
R002 primary treater on press 5;  
R003 secondary treater on press 5;  
R004 primary treater on Egan No.31;  
R005 secondary treater on Egan No.31;  
R006 primary treater on Egan No.32;  
R007 secondary treater on Egan No.32;  
T001 thru T004 2,000-gallon fixed roof storage tanks;  
Z006 material trim collection system;  
Z007 roll grinding operation; and  
Z008 photopolymer platemaking process.

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:** CI Press # 3 (K004)  
**Activity Description:** Flexographic Press / Laminator

### 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
flexographic printing press (#3) with catalytic incinerator	40 CFR 63 Subpart KK	See term A.II.3.
	OAC rule 3745-21-09(Y)(1)(b)	See term A.I.2.

#### 2. Additional Terms and Conditions

- 2.a This emissions unit shall be equipped with a capture system and associated control system which are designed and operated to achieve the following efficiencies for volatile organic compounds:
  - i. a capture efficiency which is at least 65 percent by weight; and
  - ii. a destruction efficiency which is at least 90 percent by weight.

#### II. Operational Restrictions

1. The average temperature of the exhaust gases 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 during the most recent emission test that demonstrated the emissions unit was in compliance.
2. This emissions unit shall be operated with an interlock system which prevents the operation of the printing press when the catalytic oxidizer is not in operation.
3. Should HAP usage for the facility exceed either:
  - a. 9.1 Mg (10 tons) per each rolling 12-month period of any single HAP at the facility, including materials used for source categories or purposes other than printing or publishing, or
  - b. 22.7 Mg (25 tons) per each rolling 12-month period of any combination of HAP at the facility, including materials used for source categories or purposes other than printing or publishing, the permittee shall be considered in violation of its commitment for that 12-month period and shall be considered a major source of HAP beginning the first month after the end of the 12-month period in which either of the HAP-use thresholds was exceeded. As a major source of HAP, the facility would be subject to the provisions of 40 CFR 63.820 (a)(1) and no longer be eligible for the exemption found in 40 CFR 63.820(a)(2).

Within 30 days after a violation of its commitment, the permittee shall submit a report to the appropriate Ohio EPA District Office or local air agency that either demonstrates compliance with all of the MACT requirements or provides a plan and schedule for achieving compliance with all of the MACT requirements.

## II. Operational Restrictions (continued)

4. The catalytic incinerator shall be operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals. The conversion efficiency of the catalyst in the catalytic incinerator, as determined during the catalytic activity test, shall be at least 90% at a test temperature that is representative of the normal temperature at the inlet to the catalytic incinerator. Solvent loading during the catalyst activity test shall be consistent with the test laboratory's normal testing protocol.

## 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.

The permittee shall collect and record the following information each day:

- 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 during the most recent emission test that demonstrated the emissions unit was in compliance.
  - b. All 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance. The permittee may use the temperature chart as the log that documents the temperature differential across the catalyst bed.
  - c. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation. The permittee may use the current temperature chart as the log documenting that the monitoring equipment and control device are operating. Bypass of the collection system by the emissions unit shall be logged as to the date, time, and duration.
2. The permittee shall collect and record the following information on a monthly basis, for the entire facility:
    - a. the name or identification number of each coating, as employed;
    - b. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating, in pounds of individual HAP per pound of coating, as employed;
    - c. the total combined HAPs content of each coating, in pounds of combined HAPs per pound of coating, as employed (sum all the individual HAP contents from (b));
    - d. the number of pounds of each coating employed;
    - e. the name or identification of each cleanup material employed;
    - f. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per pound of cleanup material, as employed;

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

- g. the total combined HAPs content of each cleanup material, in pounds of combined HAPs per pound of cleanup material, as employed (sum all the individual HAP contents from (f));
- h. the number of pounds of each cleanup material employed;
- i. the total individual HAP usage for each HAP from all coatings and cleanup materials employed, in pounds or tons (for each HAP, the sum of (b) times (d) for each coating plus the sum of (f) times (h) for each cleanup material);
- j. the total combined HAPs usage from all coatings and cleanup materials employed, in pounds or tons (the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material);
- k. the total individual HAP usage for each HAP for all emissions units at the facility other than the printing lines (K004-K007, K009, K010, K013) in tons;
- l. the total combined HAPs usage for all emissions units at the facility other than the printing lines (K004-K007, K009, K010, K013), in tons;
- m. the total individual HAP usage for each HAP for all emissions units at the facility, in pounds or tons;
- n. the total combined HAPs usage for all emissions units at the facility, in pounds or tons;
- o. the total individual HAP usage for each HAP for all emissions units at the facility for the previous, rolling 12-month period, in tons; and
- p. the total combined HAPs usage for all emissions units at the facility for the previous, rolling 12-month period, in tons.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act. This information does not have to be kept on a line-by-line basis or in the exact format specified above.

- 3.** The permittee shall perform a preventative maintenance inspection of the catalytic incinerator on an annual basis to evaluate the performance of the catalyst bed. The inspection shall consist of internal and visual inspections as detailed in the preventative maintenance checklist submitted to the Ohio EPA on August 9, 2001 (or a more refined checklist that may be developed by the permittee in the future and approved by Ohio EPA) and shall minimally include a physical inspection of the unit and checks of associated equipment, including but not limited to burners, controls, dampers, valves, and monitoring and recording equipment. The checks of associated equipment shall be performed in accordance with the manufacturer's recommendations or best practices as determined by the permittee if the manufacturer is silent on appropriate inspection procedures. Repair and replacement of equipment shall be performed as necessitated by the inspection. In accordance with the testing schedule in term A.V.2, a sample of catalyst material shall be collected from the catalyst bed to perform the catalyst activity tests required in term A.V.2.

The permittee shall maintain a record of the results of each annual inspection, as well as the results of each catalyst activity test required in term A.V.2.

#### **IV. Reporting Requirements**

1. The permittee shall submit quarterly summaries of the following records:
  - a. A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
  - b. 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 (as determined by the continuous temperature monitor) did not comply with the temperature limitation specified in term A.II.1 above.
  - c. All 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed (as determined by the continuous temperature monitor) was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

2. The permittee shall submit quarterly deviation (excursion) reports for each exceedance of the rolling, 12-month, usage limitations specified in term A.II.3.

The deviation reports shall be submitted in accordance with General Term and Condition A.1.c.ii of this permit.

3. The permittee shall submit annual reports that summarize the rolling 12-month total individual HAP usage and the total combined HAPs usage for all emissions units at the facility. This data may be presented by Chemical Abstract Service (CAS) number. Each report shall be submitted by January 31 of each year and cover the previous calendar year's operation.
4. The permittee shall submit reports that include the results of the catalyst activity tests required in term A.V.2. These reports shall be submitted within 45 days after each catalyst activity test is performed.

#### **V. Testing Requirements**

1. Emission testing requirements:

The permittee shall conduct, or have conducted, emission testing for emissions units K004-K007 in accordance with the following requirements:

- a. The emission testing shall be conducted within 3 months of issuance of this permit, within 2.5 years after issuance of this permit, and within 6 months prior to the expiration of this permit. The emissions testing shall be conducted for emissions units K004-K007 on a rotating basis using one representative press during each 2.5 year test effort. The permittee shall ensure that each of these four presses is tested once during the 7.5 year emission testing cycle.
- b. The emission testing shall be conducted to demonstrate compliance with the capture and control requirements specified in term A.I.2. of this permit.
- c. 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 or other approved alternative test protocol. 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)**

d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

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.

2. The permittee shall conduct, or have conducted, catalyst activity testing using the catalyst sample collected during the annual preventive maintenance inspection described in A.III.3. The catalyst activity testing shall be conducted between 14-16 months of issuance of this permit and again between 41-43 months after issuance of this permit. An intent to test notification shall not be required for the testing noted in this term. The procedure for the catalyst activity test shall be in accordance with the document entitled "Catalyst Activity Procedure" as submitted to the Ohio EPA on August 9, 2001.

## **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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
flexographic printing press (#3) with catalytic incinerator	none	none

**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:** CI Press # 4 (K005)  
**Activity Description:** Flexographic Press / Laminator

### 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
flexographic printing press (#4) with catalytic incinerator	40 CFR 63 Subpart KK	See term A.II.3.
	OAC rule 3745-21-09(Y)(1)(b)	See term A.I.2.

#### 2. Additional Terms and Conditions

- 2.a This emissions unit shall be equipped with a capture system and associated control system which are designed and operated to achieve the following efficiencies for volatile organic compounds:
  - i. a capture efficiency which is at least 65 percent by weight; and
  - ii. a destruction efficiency which is at least 90 percent by weight.

#### II. Operational Restrictions

1. The average temperature of the exhaust gases 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 during the most recent emission test that demonstrated the emissions unit was in compliance.
2. This emissions unit shall be operated with an interlock system which prevents the operation of the printing press when the catalytic oxidizer is not in operation.
3. Should HAP usage for the facility exceed either:
  - a. 9.1 Mg (10 tons) per each rolling 12-month period of any single HAP at the facility, including materials used for source categories or purposes other than printing or publishing, or
  - b. 22.7 Mg (25 tons) per each rolling 12-month period of any combination of HAP at the facility, including materials used for source categories or purposes other than printing or publishing, the permittee shall be considered in violation of its commitment for that 12-month period and shall be considered a major source of HAP beginning the first month after the end of the 12-month period in which either of the HAP-use thresholds was exceeded. As a major source of HAP, the facility would be subject to the provisions of 40 CFR 63.820 (a)(1) and no longer be eligible for the exemption found in 40 CFR 63.820(a)(2).

Within 30 days after a violation of its commitment, the permittee shall submit a report to the appropriate Ohio EPA District Office or local air agency that either demonstrates compliance with all of the MACT requirements or provides a plan and schedule for achieving compliance with all of the MACT requirements.

## II. Operational Restrictions (continued)

4. The catalytic incinerator shall be operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals. The conversion efficiency of the catalyst in the catalytic incinerator, as determined during the catalytic activity test, shall be at least 90% at a test temperature that is representative of the normal temperature at the inlet to the catalytic incinerator. Solvent loading during the catalyst activity test shall be consistent with the test laboratory's normal testing protocol.

## 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.

The permittee shall collect and record the following information each day:

- 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 during the most recent emission test that demonstrated the emissions unit was in compliance.
  - b. All 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance. The permittee may use the temperature chart as the log that documents the temperature differential across the catalyst bed.
  - c. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation. The permittee may use the current temperature chart as the log documenting that the monitoring equipment and control device are operating. Bypass of the collection system by the emissions unit shall be logged as to the date, time, and duration.
2. The permittee shall collect and record the following information on a monthly basis, for the entire facility:
    - a. the name or identification number of each coating, as employed;
    - b. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating, in pounds of individual HAP per pound of coating, as employed;
    - c. the total combined HAPs content of each coating, in pounds of combined HAPs per pound of coating, as employed (sum all the individual HAP contents from (b));
    - d. the number of pounds of each coating employed;
    - e. the name or identification of each cleanup material employed;
    - f. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per pound of cleanup material, as employed;

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

- g. the total combined HAPs content of each cleanup material, in pounds of combined HAPs per pound of cleanup material, as employed (sum all the individual HAP contents from (f));
- h. the number of pounds of each cleanup material employed;
- i. the total individual HAP usage for each HAP from all coatings and cleanup materials employed, in pounds or tons (for each HAP, the sum of (b) times (d) for each coating plus the sum of (f) times (h) for each cleanup material);
- j. the total combined HAPs usage from all coatings and cleanup materials employed, in pounds or tons (the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material);
- k. the total individual HAP usage for each HAP for all emissions units at the facility other than the printing lines (K004-K007, K009, K010, K013) in tons;
- l. the total combined HAPs usage for all emissions units at the facility other than the printing lines (K004-K007, K009, K010, K013), in tons;
- m. the total individual HAP usage for each HAP for all emissions units at the facility, in pounds or tons;
- n. the total combined HAPs usage for all emissions units at the facility, in pounds or tons;
- o. the total individual HAP usage for each HAP for all emissions units at the facility for the previous, rolling 12-month period, in tons; and
- p. the total combined HAPs usage for all emissions units at the facility for the previous, rolling 12-month period, in tons.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act. This information does not have to be kept on a line-by-line basis or in the exact format specified above.

- 3.** The permittee shall perform a preventative maintenance inspection of the catalytic incinerator on an annual basis to evaluate the performance of the catalyst bed. The inspection shall consist of internal and visual inspections as detailed in the preventative maintenance checklist submitted to the Ohio EPA on August 9, 2001 (or a more refined checklist that may be developed by the permittee in the future and approved by Ohio EPA) and shall minimally include a physical inspection of the unit and checks of associated equipment, including but not limited to burners, controls, dampers, valves, and monitoring and recording equipment. The checks of associated equipment shall be performed in accordance with the manufacturer's recommendations or best practices as determined by the permittee if the manufacturer is silent on appropriate inspection procedures. Repair and replacement of equipment shall be performed as necessitated by the inspection. In accordance with the testing schedule in term A.V.2, a sample of catalyst material shall be collected from the catalyst bed to perform the catalyst activity tests required in term A.V.2.

The permittee shall maintain a record of the results of each annual inspection, as well as the results of each catalyst activity test required in term A.V.2.

#### **IV. Reporting Requirements**

1. The permittee shall submit quarterly summaries of the following records:
  - a. A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
  - b. 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 (as determined by the continuous temperature monitor) did not comply with the temperature limitation specified in term A.II.1 above.
  - c. All 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed (as determined by the continuous temperature monitor) was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

2. The permittee shall submit quarterly deviation (excursion) reports for each exceedance of the rolling, 12-month, usage limitations specified in term A.II.3.

The deviation reports shall be submitted in accordance with General Term and Condition A.1.c.ii of this permit.

3. The permittee shall submit annual reports that summarize the rolling 12-month total individual HAP usage and the total combined HAPs usage for all emissions units at the facility. This data may be presented by Chemical Abstract Service (CAS) number. Each report shall be submitted by January 31 of each year and cover the previous calendar year's operation.
4. The permittee shall submit reports that include the results of the catalyst activity tests required in term A.V.2. These reports shall be submitted within 45 days after each catalyst activity test is performed.

#### **V. Testing Requirements**

1. Emission testing requirements:

The permittee shall conduct, or have conducted, emission testing for emissions units K004-K007 in accordance with the following requirements:

- a. The emission testing shall be conducted within 3 months of issuance of this permit, within 2.5 years after issuance of this permit, and within 6 months prior to the expiration of this permit. The emissions testing shall be conducted for emissions units K004-K007 on a rotating basis using one representative press during each 2.5 year test effort. The permittee shall ensure that each of these four presses is tested once during the 7.5 year emission testing cycle.
- b. The emission testing shall be conducted to demonstrate compliance with the capture and control requirements specified in term A.I.2. of this permit.
- c. 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 or other approved alternative test protocol. 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)**

d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

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.

2. The permittee shall conduct, or have conducted, catalyst activity testing using the catalyst sample collected during the annual preventive maintenance inspection described in A.III.3. The catalyst activity testing shall be conducted between 14-16 months of issuance of this permit and again between 41-43 months after issuance of this permit. An intent to test notification shall not be required for the testing noted in this term. The procedure for the catalyst activity test shall be in accordance with the document entitled "Catalyst Activity Procedure" as submitted to the Ohio EPA on August 9, 2001.

## **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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
flexographic printing press (#4) with catalytic incinerator	none	none

**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:** CI Press # 5 (K006)  
**Activity Description:** Flexographic Press / Laminator

### 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
flexographic printing press (#5) with catalytic incinerator	40 CFR 63 Subpart KK	See term A.II.3.
	OAC rule 3745-21-09(Y)(1)(b)	See term A.I.2.

#### 2. Additional Terms and Conditions

- 2.a This emissions unit shall be equipped with a capture system and associated control system which are designed and operated to achieve the following efficiencies for volatile organic compounds:
  - i. a capture efficiency which is at least 65 percent by weight; and
  - ii. a destruction efficiency which is at least 90 percent by weight.

#### II. Operational Restrictions

1. The average temperature of the exhaust gases 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 during the most recent emission test that demonstrated the emissions unit was in compliance.
2. This emissions unit shall be operated with an interlock system which prevents the operation of the printing press when the catalytic oxidizer is not in operation.
3. Should HAP usage for the facility exceed either:
  - a. 9.1 Mg (10 tons) per each rolling 12-month period of any single HAP at the facility, including materials used for source categories or purposes other than printing or publishing, or
  - b. 22.7 Mg (25 tons) per each rolling 12-month period of any combination of HAP at the facility, including materials used for source categories or purposes other than printing or publishing, the permittee shall be considered in violation of its commitment for that 12-month period and shall be considered a major source of HAP beginning the first month after the end of the 12-month period in which either of the HAP-use thresholds was exceeded. As a major source of HAP, the facility would be subject to the provisions of 40 CFR 63.820 (a)(1) and no longer be eligible for the exemption found in 40 CFR 63.820(a)(2).

Within 30 days after a violation of its commitment, the permittee shall submit a report to the appropriate Ohio EPA District Office or local air agency that either demonstrates compliance with all of the MACT requirements or provides a plan and schedule for achieving compliance with all of the MACT requirements.

## II. Operational Restrictions (continued)

4. The catalytic incinerator shall be operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals. The conversion efficiency of the catalyst in the catalytic incinerator, as determined during the catalytic activity test, shall be at least 90% at a test temperature that is representative of the normal temperature at the inlet to the catalytic incinerator. Solvent loading during the catalyst activity test shall be consistent with the test laboratory's normal testing protocol.

## 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.

The permittee shall collect and record the following information each day:

- 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 during the most recent emission test that demonstrated the emissions unit was in compliance.
  - b. All 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance. The permittee may use the temperature chart as the log that documents the temperature differential across the catalyst bed.
  - c. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation. The permittee may use the current temperature chart as the log documenting that the monitoring equipment and control device are operating. Bypass of the collection system by the emissions unit shall be logged as to the date, time, and duration.
2. The permittee shall collect and record the following information on a monthly basis, for the entire facility:
    - a. the name or identification number of each coating, as employed;
    - b. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating, in pounds of individual HAP per pound of coating, as employed;
    - c. the total combined HAPs content of each coating, in pounds of combined HAPs per pound of coating, as employed (sum all the individual HAP contents from (b));
    - d. the number of pounds of each coating employed;
    - e. the name or identification of each cleanup material employed;
    - f. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per pound of cleanup material, as employed;

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

- g. the total combined HAPs content of each cleanup material, in pounds of combined HAPs per pound of cleanup material, as employed (sum all the individual HAP contents from (f));
- h. the number of pounds of each cleanup material employed;
- i. the total individual HAP usage for each HAP from all coatings and cleanup materials employed, in pounds or tons (for each HAP, the sum of (b) times (d) for each coating plus the sum of (f) times (h) for each cleanup material);
- j. the total combined HAPs usage from all coatings and cleanup materials employed, in pounds or tons (the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material);
- k. the total individual HAP usage for each HAP for all emissions units at the facility other than the printing lines (K004-K007, K009, K010, K013) in tons;
- l. the total combined HAPs usage for all emissions units at the facility other than the printing lines (K004-K007, K009, K010, K013), in tons;
- m. the total individual HAP usage for each HAP for all emissions units at the facility, in pounds or tons;
- n. the total combined HAPs usage for all emissions units at the facility, in pounds or tons;
- o. the total individual HAP usage for each HAP for all emissions units at the facility for the previous, rolling 12-month period, in tons; and
- p. the total combined HAPs usage for all emissions units at the facility for the previous, rolling 12-month period, in tons.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act. This information does not have to be kept on a line-by-line basis or in the exact format specified above.

- 3. The permittee shall perform a preventative maintenance inspection of the catalytic incinerator on an annual basis to evaluate the performance of the catalyst bed. The inspection shall consist of internal and visual inspections as detailed in the preventative maintenance checklist submitted to the Ohio EPA on August 9, 2001 (or a more refined checklist that may be developed by the permittee in the future and approved by Ohio EPA) and shall minimally include a physical inspection of the unit and checks of associated equipment, including but not limited to burners, controls, dampers, valves, and monitoring and recording equipment. The checks of associated equipment shall be performed in accordance with the manufacturer's recommendations or best practices as determined by the permittee if the manufacturer is silent on appropriate inspection procedures. Repair and replacement of equipment shall be performed as necessitated by the inspection. In accordance with the testing schedule in term A.V.2, a sample of catalyst material shall be collected from the catalyst bed to perform the catalyst activity tests required in term A.V.2.

The permittee shall maintain a record of the results of each annual inspection, as well as the results of each catalyst activity test required in term A.V.2.

#### **IV. Reporting Requirements**

1. The permittee shall submit quarterly summaries of the following records:
  - a. A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
  - b. 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 (as determined by the continuous temperature monitor) did not comply with the temperature limitation specified in term A.II.1 above.
  - c. All 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed (as determined by the continuous temperature monitor) was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

2. The permittee shall submit quarterly deviation (excursion) reports for each exceedance of the rolling, 12-month, usage limitations specified in term A.II.3.

The deviation reports shall be submitted in accordance with General Term and Condition A.1.c.ii of this permit.

3. The permittee shall submit annual reports that summarize the rolling 12-month total individual HAP usage and the total combined HAPs usage for all emissions units at the facility. This data may be presented by Chemical Abstract Service (CAS) number. Each report shall be submitted by January 31 of each year and cover the previous calendar year's operation.
4. The permittee shall submit reports that include the results of the catalyst activity tests required in term A.V.2. These reports shall be submitted within 45 days after each catalyst activity test is performed.

#### **V. Testing Requirements**

1. Emission testing requirements:

The permittee shall conduct, or have conducted, emission testing for emissions units K004-K007 in accordance with the following requirements:

- a. The emission testing shall be conducted within 3 months of issuance of this permit, within 2.5 years after issuance of this permit, and within 6 months prior to the expiration of this permit. The emissions testing shall be conducted for emissions units K004-K007 on a rotating basis using one representative press during each 2.5 year test effort. The permittee shall ensure that each of these four presses is tested once during the 7.5 year emission testing cycle.
- b. The emission testing shall be conducted to demonstrate compliance with the capture and control requirements specified in term A.I.2. of this permit.
- c. 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 or other approved alternative test protocol. 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)**

d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

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.

2. The permittee shall conduct, or have conducted, catalyst activity testing using the catalyst sample collected during the annual preventive maintenance inspection described in A.III.3. The catalyst activity testing shall be conducted between 14-16 months of issuance of this permit and again between 41-43 months after issuance of this permit. An intent to test notification shall not be required for the testing noted in this term. The procedure for the catalyst activity test shall be in accordance with the document entitled "Catalyst Activity Procedure" as submitted to the Ohio EPA on August 9, 2001.

## **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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
flexographic printing press (#5) with catalytic incinerator	none	none

**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:** CI Press # 6 (K007)  
**Activity Description:** Flexographic Press / Laminator

### 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
flexographic printing press (#6) with catalytic incinerator	40 CFR 63 Subpart KK	See term A.II.3.
	OAC rule 3745-21-09(Y)(1)(b)	See term A.I.2.

#### 2. Additional Terms and Conditions

- 2.a This emissions unit shall be equipped with a capture system and associated control system which are designed and operated to achieve the following efficiencies for volatile organic compounds:
  - i. a capture efficiency which is at least 65 percent by weight; and
  - ii. a destruction efficiency which is at least 90 percent by weight.

#### II. Operational Restrictions

1. The average temperature of the exhaust gases 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 during the most recent emission test that demonstrated the emissions unit was in compliance.
2. This emissions unit shall be operated with an interlock system which prevents the operation of the printing press when the catalytic oxidizer is not in operation.
3. Should HAP usage for the facility exceed either:
  - a. 9.1 Mg (10 tons) per each rolling 12-month period of any single HAP at the facility, including materials used for source categories or purposes other than printing or publishing, or
  - b. 22.7 Mg (25 tons) per each rolling 12-month period of any combination of HAP at the facility, including materials used for source categories or purposes other than printing or publishing, the permittee shall be considered in violation of its commitment for that 12-month period and shall be considered a major source of HAP beginning the first month after the end of the 12-month period in which either of the HAP-use thresholds was exceeded. As a major source of HAP, the facility would be subject to the provisions of 40 CFR 63.820 (a)(1) and no longer be eligible for the exemption found in 40 CFR 63.820(a)(2).

Within 30 days after a violation of its commitment, the permittee shall submit a report to the appropriate Ohio EPA District Office or local air agency that either demonstrates compliance with all of the MACT requirements or provides a plan and schedule for achieving compliance with all of the MACT requirements.

## II. Operational Restrictions (continued)

4. The catalytic incinerator shall be operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals. The conversion efficiency of the catalyst in the catalytic incinerator, as determined during the catalytic activity test, shall be at least 90% at a test temperature that is representative of the normal temperature at the inlet to the catalytic incinerator. Solvent loading during the catalyst activity test shall be consistent with the test laboratory's normal testing protocol.

## 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.

The permittee shall collect and record the following information each day:

- 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 during the most recent emission test that demonstrated the emissions unit was in compliance.
  - b. All 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance. The permittee may use the temperature chart as the log that documents the temperature differential across the catalyst bed.
  - c. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation. The permittee may use the current temperature chart as the log documenting that the monitoring equipment and control device are operating. Bypass of the collection system by the emissions unit shall be logged as to the date, time, and duration.
2. The permittee shall collect and record the following information on a monthly basis, for the entire facility:
    - a. the name or identification number of each coating, as employed;
    - b. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating, in pounds of individual HAP per pound of coating, as employed;
    - c. the total combined HAPs content of each coating, in pounds of combined HAPs per pound of coating, as employed (sum all the individual HAP contents from (b));
    - d. the number of pounds of each coating employed;
    - e. the name or identification of each cleanup material employed;
    - f. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per pound of cleanup material, as employed;

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

- g. the total combined HAPs content of each cleanup material, in pounds of combined HAPs per pound of cleanup material, as employed (sum all the individual HAP contents from (f));
- h. the number of pounds of each cleanup material employed;
- i. the total individual HAP usage for each HAP from all coatings and cleanup materials employed, in pounds or tons (for each HAP, the sum of (b) times (d) for each coating plus the sum of (f) times (h) for each cleanup material);
- j. the total combined HAPs usage from all coatings and cleanup materials employed, in pounds or tons (the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material);
- k. the total individual HAP usage for each HAP for all emissions units at the facility other than the printing lines (K004-K007, K009, K010, K013) in tons;
- l. the total combined HAPs usage for all emissions units at the facility other than the printing lines (K004-K007, K009, K010, K013), in tons;
- m. the total individual HAP usage for each HAP for all emissions units at the facility, in pounds or tons;
- n. the total combined HAPs usage for all emissions units at the facility, in pounds or tons;
- o. the total individual HAP usage for each HAP for all emissions units at the facility for the previous, rolling 12-month period, in tons; and
- p. the total combined HAPs usage for all emissions units at the facility for the previous, rolling 12-month period, in tons.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act. This information does not have to be kept on a line-by-line basis or in the exact format specified above.

- 3. The permittee shall perform a preventative maintenance inspection of the catalytic incinerator on an annual basis to evaluate the performance of the catalyst bed. The inspection shall consist of internal and visual inspections as detailed in the preventative maintenance checklist submitted to the Ohio EPA on August 9, 2001 (or a more refined checklist that may be developed by the permittee in the future and approved by Ohio EPA) and shall minimally include a physical inspection of the unit and checks of associated equipment, including but not limited to burners, controls, dampers, valves, and monitoring and recording equipment. The checks of associated equipment shall be performed in accordance with the manufacturer's recommendations or best practices as determined by the permittee if the manufacturer is silent on appropriate inspection procedures. Repair and replacement of equipment shall be performed as necessitated by the inspection. In accordance with the testing schedule in term A.V.2, a sample of catalyst material shall be collected from the catalyst bed to perform the catalyst activity tests required in term A.V.2.

The permittee shall maintain a record of the results of each annual inspection, as well as the results of each catalyst activity test required in term A.V.2.

#### **IV. Reporting Requirements**

1. The permittee shall submit quarterly summaries of the following records:
  - a. A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
  - b. 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 (as determined by the continuous temperature monitor) did not comply with the temperature limitation specified in term A.II.1 above.
  - c. All 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed (as determined by the continuous temperature monitor) was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

2. The permittee shall submit quarterly deviation (excursion) reports for each exceedance of the rolling, 12-month, usage limitations specified in term A.II.3.

The deviation reports shall be submitted in accordance with General Term and Condition A.1.c.ii of this permit.

3. The permittee shall submit annual reports that summarize the rolling 12-month total individual HAP usage and the total combined HAPs usage for all emissions units at the facility. This data may be presented by Chemical Abstract Service (CAS) number. Each report shall be submitted by January 31 of each year and cover the previous calendar year's operation.
4. The permittee shall submit reports that include the results of the catalyst activity tests required in term A.V.2. These reports shall be submitted within 45 days after each catalyst activity test is performed.

#### **V. Testing Requirements**

1. Emission testing requirements:

The permittee shall conduct, or have conducted, emission testing for emissions units K004-K007 in accordance with the following requirements:

- a. The emission testing shall be conducted within 3 months of issuance of this permit, within 2.5 years after issuance of this permit, and within 6 months prior to the expiration of this permit. The emissions testing shall be conducted for emissions units K004-K007 on a rotating basis using one representative press during each 2.5 year test effort. The permittee shall ensure that each of these four presses is tested once during the 7.5 year emission testing cycle.
- b. The emission testing shall be conducted to demonstrate compliance with the capture and control requirements specified in term A.I.2. of this permit.
- c. 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 or other approved alternative test protocol. 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)**

d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

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.

2. The permittee shall conduct, or have conducted, catalyst activity testing using the catalyst sample collected during the annual preventive maintenance inspection described in A.III.3. The catalyst activity testing shall be conducted between 14-16 months of issuance of this permit and again between 41-43 months after issuance of this permit. An intent to test notification shall not be required for the testing noted in this term. The procedure for the catalyst activity test shall be in accordance with the document entitled "Catalyst Activity Procedure" as submitted to the Ohio EPA on August 9, 2001.

## **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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
flexographic printing press (#6) with catalytic incinerator	none	none

**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:** Egan # 31 (K009)  
**Activity Description:** Extrusion Laminator / Coater

**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
rotogravure extrusion laminator and coater No. 31	40 CFR 63 Subpart KK	See term A.II.1.
	OAC rule 3745-21-09(Y)(1)(a)	See term A.I.2.

**2. Additional Terms and Conditions**

- 2.a The volatile organic compound content of the coatings and inks employed in this emissions unit shall not exceed the following:
  - i. forty percent VOC by volume of the coating and ink, excluding water and exempt solvents; or
  - ii. twenty-five percent VOC by volume of the volatile matter in the coating and ink.

**II. Operational Restrictions**

1. Should HAP usage for the facility exceed either:
  - a. 9.1 Mg (10 tons) per each rolling 12-month period of any single HAP at the facility, including materials used for source categories or purposes other than printing or publishing, or
  - b. 22.7 Mg (25 tons) per each rolling 12-month period of any combination of HAP at the facility, including materials used for source categories or purposes other than printing or publishing, the permittee shall be considered in violation of its commitment for that 12-month period and shall be considered a major source of HAP beginning the first month after the end of the 12-month period in which either of the HAP-use thresholds was exceeded. As a major source of HAP, the facility would be subject to the provisions of 40 CFR 63.820 (a)(1) and no longer be eligible for the exemption found in 40 CFR 63.820(a)(2).

Within 30 days after a violation of its commitment, the permittee shall submit a report to the appropriate Ohio EPA District Office or local air agency that either demonstrates compliance with all of the MACT requirements or provides a plan and schedule for achieving compliance with all of the MACT requirements.

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for the line:
  - a. The name and identification number of each coating and ink.
  - b. The percent VOC by volume of the coating and ink, as employed, excluding water and exempt solvents, and the percent VOC by volume of the volatile matter in the coating and ink, as employed.

(This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to specific "gallons/year" and "tons/year" limitations, or just a "tons/year" limitation in a Permit to Install. In such cases, for each such new emissions unit only, the above-mentioned information must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

2. The permittee shall collect and record the following information on a monthly basis, for the entire facility:
  - a. the name or identification number of each coating, as employed;
  - b. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating, in pounds of individual HAP per pound of coating, as employed;
  - c. the total combined HAPs content of each coating, in pounds of combined HAPs per pound of coating, as employed (sum all the individual HAP contents from (b));
  - d. the number of pounds of each coating employed;
  - e. the name or identification of each cleanup material employed;
  - f. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per pound of cleanup material, as employed;
  - g. the total combined HAPs content of each cleanup material, in pounds of combined HAPs per pound of cleanup material, as employed (sum all the individual HAP contents from (f));
  - h. the number of pounds of each cleanup material employed;
  - i. the total individual HAP usage for each HAP from all coatings and cleanup materials employed, in pounds or tons (for each HAP, the sum of (b) times (d) for each coating plus the sum of (f) times (h) for each cleanup material);
  - j. the total combined HAPs usage from all coatings and cleanup materials employed, in pounds or tons (the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material);
  - k. the total individual HAP usage for each HAP for all emissions units at the facility other than the printing lines (K004-K007, K009, K010, K013) in tons;
  - l. the total combined HAPs usage for all emissions units at the facility other than the printing lines (K004-K007, K009, K010, K013), in tons;
  - m. the total individual HAP usage for each HAP for all emissions units at the facility, in pounds or tons;
  - n. the total combined HAPs usage for all emissions units at the facility, in pounds or tons;
  - o. the total individual HAP usage for each HAP for all emissions units at the facility for the previous, rolling 12-month period, in tons; and
  - p. the total combined HAPs usage for all emissions units at the facility for the previous, rolling 12-month period, in tons.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act. This information does not have to be kept on a line-by-line basis or in the exact format specified above.

#### **IV. Reporting Requirements**

1. 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. 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 month.
2. The permittee shall submit quarterly deviation (excursion) reports for any exceedence of the rolling, 12-month, usage limitations specified in term A.II.1.

The deviation reports shall be submitted in accordance with General Term and Condition A.1.c.ii of this permit.

3. The permittee shall submit annual reports that summarize the rolling 12-month total individual HAP usage and the total combined HAPs usage for all emissions units at the facility. This data may be presented by Chemical Abstract Service (CAS) number. Each report shall be submitted by January 31 of each year and cover the previous calendar year's operation.

#### **V. Testing Requirements**

1. Compliance with the coating VOC content limitations listed in term A.I.2. shall be demonstrated by the following methods:

USEPA Methods 24 and 24A shall be used to determine the VOC content for (a) coatings and (b) flexographic and rotogravure printing lines and related coatings, respectively. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A. (Certified product data sheets from the supplier may be used to demonstrate compliance as long as the certification is based on USEPA Method 24 or 24A.)

#### **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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
rotogravure extrusion laminator and coater No. 31	none	none

**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:** Egan # 32 (K010)  
**Activity Description:** Extrusion Laminator / Coater

**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
rotogravure extrusion laminator and coater No. 32	40 CFR 63 Subpart KK	See term A.II.1.
	OAC rule 3745-21-09(Y)(1)(a)	See term A.I.2.

**2. Additional Terms and Conditions**

- 2.a The volatile organic compound content of the coatings and inks employed in this emissions unit shall not exceed the following:
  - i. forty percent VOC by volume of the coating and ink, excluding water and exempt solvents; or
  - ii. twenty-five percent VOC by volume of the volatile matter in the coating and ink.

**II. Operational Restrictions**

1. Should HAP usage for the facility exceed either:
  - a. 9.1 Mg (10 tons) per each rolling 12-month period of any single HAP at the facility, including materials used for source categories or purposes other than printing or publishing, or
  - b. 22.7 Mg (25 tons) per each rolling 12-month period of any combination of HAP at the facility, including materials used for source categories or purposes other than printing or publishing, the permittee shall be considered in violation of its commitment for that 12-month period and shall be considered a major source of HAP beginning the first month after the end of the 12-month period in which either of the HAP-use thresholds was exceeded. As a major source of HAP, the facility would be subject to the provisions of 40 CFR 63.820 (a)(1) and no longer be eligible for the exemption found in 40 CFR 63.820(a)(2).

Within 30 days after a violation of its commitment, the permittee shall submit a report to the appropriate Ohio EPA District Office or local air agency that either demonstrates compliance with all of the MACT requirements or provides a plan and schedule for achieving compliance with all of the MACT requirements.

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for the line:
  - a. The name and identification number of each coating and ink.
  - b. The percent VOC by volume of the coating and ink, as employed, excluding water and exempt solvents, and the percent VOC by volume of the volatile matter in the coating and ink, as employed.

(This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to specific "gallons/year" and "tons/year" limitations, or just a "tons/year" limitation in a Permit to Install. In such cases, for each such new emissions unit only, the above-mentioned information must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

2. The permittee shall collect and record the following information on a monthly basis, for the entire facility:
  - a. the name or identification number of each coating, as employed;
  - b. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating, in pounds of individual HAP per pound of coating, as employed;
  - c. the total combined HAPs content of each coating, in pounds of combined HAPs per pound of coating, as employed (sum all the individual HAP contents from (b));
  - d. the number of pounds of each coating employed;
  - e. the name or identification of each cleanup material employed;
  - f. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per pound of cleanup material, as employed;
  - g. the total combined HAPs content of each cleanup material, in pounds of combined HAPs per pound of cleanup material, as employed (sum all the individual HAP contents from (f));
  - h. the number of pounds of each cleanup material employed;
  - i. the total individual HAP usage for each HAP from all coatings and cleanup materials employed, in pounds or tons (for each HAP, the sum of (b) times (d) for each coating plus the sum of (f) times (h) for each cleanup material);
  - j. the total combined HAPs usage from all coatings and cleanup materials employed, in pounds or tons (the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material);
  - k. the total individual HAP usage for each HAP for all emissions units at the facility other than the printing lines (K004-K007, K009, K010, K013) in tons;
  - l. the total combined HAPs usage for all emissions units at the facility other than the printing lines (K004-K007, K009, K010, K013), in tons;
  - m. the total individual HAP usage for each HAP for all emissions units at the facility, in pounds or tons;
  - n. the total combined HAPs usage for all emissions units at the facility, in pounds or tons;
  - o. the total individual HAP usage for each HAP for all emissions units at the facility for the previous, rolling 12-month period, in tons; and
  - p. the total combined HAPs usage for all emissions units at the facility for the previous, rolling 12-month period, in tons.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act. This information does not have to be kept on a line-by-line basis or in the exact format specified above.

#### **IV. Reporting Requirements**

1. 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. 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 month.
2. The permittee shall submit quarterly deviation (excursion) reports for any exceedence of the rolling, 12-month, usage limitations specified in term A.II.1.

The deviation reports shall be submitted in accordance with General Term and Condition A.1.c.ii of this permit.

3. The permittee shall submit annual reports that summarize the rolling 12-month total individual HAP usage and the total combined HAPs usage for all emissions units at the facility. This data may be presented by Chemical Abstract Service (CAS) number. Each report shall be submitted by January 31 of each year and cover the previous calendar year's operation.

#### **V. Testing Requirements**

1. Compliance with the coating VOC content limitations listed in term A.I.2. shall be demonstrated by the following methods:

USEPA Methods 24 and 24A shall be used to determine the VOC content for (a) coatings and (b) flexographic and rotogravure printing lines and related coatings, respectively. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A. (Certified product data sheets from the supplier may be used to demonstrate compliance as long as the certification is based on USEPA Method 24 or 24A.)

#### **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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
rotogravure extrusion laminator and coater No. 32	none	none

**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:** CI Press # 2 (K013)  
**Activity Description:** Flexographic Press / Laminator

**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
6-color flexographic printing press	OAC rule 3745-31-05(A)(3) (PTI 14-04781)	290 lbs/day VOC 1.1 lbs/hr Ammonia 3.7 TPY Ammonia  See term A.I.2.
	OAC rule 3745-31-05(D) (PTI 14-04781)	The requirements of this rule also include compliance with the requirements of 40 CFR 63 Subpart KK. 37.5 TPY VOC, based on a rolling, 12-month summation
	OAC rule 3745-21-09(Y)(1)(a)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	40 CFR 63 Subpart KK	See term A.II.1.

**2. Additional Terms and Conditions**

- 2.a The VOC content of the coatings and inks employed in emissions unit K013 shall not exceed twenty (20) percent VOC as a daily volume-weighted average, excluding water and exempt solvents.
- 2.b The lbs/hr ammonia emission limitation is based upon the emissions unit's potential to emit (PTE). Therefore, no hourly records are required to demonstrate compliance with this limit.

Compliance with the TPY ammonia limit is assumed provided compliance is maintained with the rolling, 12-month VOC limitation.

## II. Operational Restrictions

1. Should HAP usage for the facility exceed either:
  - a. 9.1 Mg (10 tons) per each rolling 12-month period of any single HAP at the facility, including materials used for source categories or purposes other than printing or publishing, or
  - b. 22.7 Mg (25 tons) per each rolling 12-month period of any combination of HAP at the facility, including materials used for source categories or purposes other than printing or publishing, the permittee shall be considered in violation of its commitment for that 12-month period and shall be considered a major source of HAP beginning the first month after the end of the 12-month period in which either of the HAP-use thresholds was exceeded. As a major source of HAP, the facility would be subject to the provisions of 40 CFR 63.820 (a)(1) and no longer be eligible for the exemption found in 40 CFR 63.820(a)(2).

Within 30 days after a violation of its commitment, the permittee shall submit a report to the appropriate Ohio EPA District Office or local air agency that either demonstrates compliance with all of the MACT requirements or provides a plan and schedule for achieving compliance with all of the MACT requirements.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day:
  - a. The name or identification number of each coating and ink.
  - b. The VOC content of each coating and ink, in pounds VOC per gallon, as employed.
  - c. The percent VOC by volume of all the coatings and inks (excluding water and exempt solvents), as a daily volume-weighted average [calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,5].
  - d. The volume, in gallons, of each coating and ink employed.
  - e. The total combined VOC emissions from all coatings and inks employed, in pounds per day, calculated as the sum of (b)x(d) for each coating and ink employed.
2. The permittee shall maintain monthly records of the following information:
  - a. The total VOC emissions, in tons, from all coatings and inks employed, calculated as the sum of A.III.1.e for each day during the month divided by 2000.
  - b. The rolling, 12-month summation of the VOC emissions.
3. The permittee shall collect and record the following information on a monthly basis, for the entire facility:
  - a. the name or identification number of each coating, as employed;
  - b. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating, in pounds of individual HAP per pound of coating, as employed;
  - c. the total combined HAPs content of each coating, in pounds of combined HAPs per pound of coating, as employed (sum all the individual HAP contents from (b));
  - d. the number of pounds of each coating employed;
  - e. the name or identification of each cleanup material employed;
  - f. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per pound of cleanup material, as employed;

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

- g. the total combined HAPs content of each cleanup material, in pounds of combined HAPs per pound of cleanup material, as employed (sum all the individual HAP contents from (f));
- h. the number of pounds of each cleanup material employed;
- i. the total individual HAP usage for each HAP from all coatings and cleanup materials employed, in pounds or tons (for each HAP, the sum of (b) times (d) for each coating plus the sum of (f) times (h) for each cleanup material);
- j. the total combined HAPs usage from all coatings and cleanup materials employed, in pounds or tons (the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material);
- k. the total individual HAP usage for each HAP for all emissions units at the facility other than the printing lines (K004-K007, K009, K010, K013) in tons;
- l. the total combined HAPs usage for all emissions units at the facility other than the printing lines (K004-K007, K009, K010, K013), in tons;
- m. the total individual HAP usage for each HAP for all emissions units at the facility, in pounds or tons;
- n. the total combined HAPs usage for all emissions units at the facility, in pounds or tons;
- o. the total individual HAP usage for each HAP for all emissions units at the facility for the previous, rolling 12-month period, in tons; and
- p. the total combined HAPs usage for all emissions units at the facility for the previous, rolling 12-month period, in tons.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act. This information does not have to be kept on a line-by-line basis or in the exact format specified above.

### IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of coatings and inks with a VOC content greater than twenty (20) percent VOC as a daily volume-weighted average, excluding water and exempt solvents. 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 month.
2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month VOC emission limitation.
3. The permittee shall submit quarterly deviation (excursion) reports for any exceedance of the rolling, 12-month, HAP usage limitations specified in term A.II.1.
4. The deviation reports shall be submitted in accordance with General Term and Condition A.1.c.ii of this permit.
5. The permittee shall submit annual reports for emissions unit K013 which list the total rolling 12-month VOC emissions for each month during the calendar year. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
6. The permittee shall submit annual reports that summarize the rolling 12-month total individual HAP usage and the total combined HAPs usage for all emissions units at the facility. This data may be presented by Chemical Abstract Service (CAS) number. Each report shall be submitted by January 31 of each year and cover the previous calendar year's operation.

### V. Testing Requirements

1. Compliance with the daily VOC emission limitation in Section A.I.1 shall be demonstrated based on the record keeping specified in term A.III.1.e

## **V. Testing Requirements (continued)**

2. Emission Limitation:  
The VOC content of the coatings and inks employed in emissions unit K013 shall not exceed twenty (20) percent VOC as a daily volume weighted average, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.1.c.

In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24A shall be used to determine the VOC contents of the coatings and inks. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24A (Certified Product Data Sheets from the supplier may be used to demonstrate compliance as long the certification is based on USEPA Method 24A).

3. Compliance with the rolling, 12-month VOC emission limitation shall be demonstrated by the record keeping specified in Section A.III.2.b.

## **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

- 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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6-color flexographic printing press

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

- The permit to install for this emissions unit (K013) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: ammonia

TLV (ug/m3): 17,400

Maximum Hourly Emission Rate (lbs/hr): 1.1

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 216

MAGLC (ug/m3): 414

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

Physical changes to or in the method of operation of the emissions unit after it's installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled: and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of it's evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

### **IV. Reporting Requirements**

**None**

### **V. Testing Requirements**

**None**

### **VI. Miscellaneous Requirements**

**None**

## Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Parts Washer (L001)  
**Activity Description:** Parts Washer

### 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.

<b>Operations, Property, and/or Equipment</b>	<b>Applicable Rules/ Requirements</b>	<b>Applicable Emissions Limitations/Control Measures</b>
cold cleaner (non-halogenated solvent) with cover	OAC rule 3745-21-09(O)(2)	See term A.I.2.

#### 2. Additional Terms and Conditions

- 2.a The cold cleaner shall be operated with a cover, if the solvent has a vapor pressure greater than 0.3 pound per square inch absolute, measured at 100 degrees Fahrenheit or, if the solvent is heated or agitated, the cover shall be designed and constructed so that it can be easily operated with one hand.
- 2.b The cold cleaner shall be equipped with a device for draining the cleaned parts; and if the solvent has a vapor pressure greater than 0.6 pound per square inch absolute, measured at 100 degrees Fahrenheit, the drainage facility shall be constructed internally so that parts are enclosed under the cover during draining, unless an internal type drainage device cannot fit into the cleaning system.
- 2.c A freeboard ratio of greater than or equal to 0.7 shall be maintained.

#### II. Operational Restrictions

1. The cold cleaner shall be operated and maintained in accordance with the following practices to minimize solvent evaporation from the unit:
  - a. Provide a permanent, legible, conspicuous label, summarizing the operating requirements.
  - b. Store waste solvent in covered containers.
  - c. Close the cover whenever parts are not being handled in the cleaner.
  - d. Drain the cleaned parts until dripping ceases.
  - e. If used, supply a solvent spray that is a solid fluid stream (not a fine, atomized, or shower-type spray) at a pressure that does not exceed 10 pounds per square inch gauge.
  - f. Clean only materials that are neither porous nor absorbent.

**III. Monitoring and/or Record Keeping Requirements**

1. The permittee shall maintain records of the following information:
  - a. The types of solvents employed in the cold cleaner.
  - b. The vapor pressure of each solvent, in pounds per square inch absolute, measured at 100 degrees Fahrenheit.

**IV. Reporting Requirements**

**None**

**V. Testing Requirements**

1. The free board ratio shall be determined by dividing the height (distance from the solvent surface to the top edge of the degreaser tank) by the width (at the solvent surface).

**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
cold cleaner (non-halogenated solvent) with cover	none	none

**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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