



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

03/28/03

CERTIFIED MAIL

**RE: Preliminary Proposed Title V
Chapter 3745-77 permit**

13-18-53-2181
Jefferson Smurfit Corp. - Solon
Tom Elphick
6385 Cochran Road
Solon, OH 44139-1000

Dear Tom Elphick:

Enclosed is the Ohio EPA Preliminary Proposed Title V permit that was issued in draft form on 03/16/01. The comment period for the Draft permit has ended. We are now ready to submit this permit to USEPA for approval.

We are submitting this for your review and comment. If you do not agree with the Preliminary Proposed Title V permit as written, you now have the opportunity to raise your concerns. **Please submit, in writing, any comments you may have within fourteen (14) days from your receipt of this letter to:**

Ohio Environmental Protection Agency
Jim Orlemann, Manager, Engineering Section
Division of Air Pollution Control
P.O.Box 1049
Columbus, OH 43216-1049

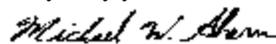
and

Cleveland Division of Air Pollution Control
1925 St. Clair
Cleveland, OH 44114
(216) 664-2324

Also, if you believe that it is necessary to have an informal conference with us, then, as part of your written comments, you should request a conference concerning the written comments.

If comments are not submitted within fourteen (14) days of your receipt of this letter, we will forward the proposed permit to USEPA for approval. All comments received will be carefully considered before proceeding to the proposed permit.

Very truly yours,


Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

cc: Cleveland Division of Air Pollution Control
File, DAPC PMU



State of Ohio Environmental Protection Agency

PRELIMINARY PROPOSED TITLE V PERMIT

Issue Date: 03/28/03

Effective Date: To be entered upon final issuance

Expiration Date: To be entered upon final issuance

This document constitutes issuance of a Title V permit for Facility ID: 13-18-53-2181 to:
Jefferson Smurfit Corp. - Solon
6385 Cochran Road
Solon, OH 44139-1000

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

K002 (Web Offset Press No. 1) Non-heatset, web, offset lithographic printing press (No. 1) with EB and UV curing capabilities.	K009 (Sheetfed Offset Press KBA972) Non-heatset, sheetfed, offset lithographic printing press (KBA972)	P001 (Asitrade Corrugating Machine 1) Corrugating machine with capability to glue pre-printed sheet or pre-printed web.
K003 (Web Offset Press No. 2) Non-heatset, web, offset lithographic printing press (No. 2) with EB and UV curing capabilities.	K010 (Flexographic unit No. 1) Flexographic printing unit equipped with natural gas fired dryer (Flexo 1)	P002 (Asitrade Corrugating Machine 2) Corrugating machine with capability to glue pre-printed sheet or pre-printed web.
K008 (Sheetfed Offset Press KBA97) Non-heatset, sheetfed, offset lithographic printing press (KBA97)	K011 (Flexographic unit No. 2) Flexographic printing unit equipped with natural gas fired dryer (Flexo 2)	

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

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

Cleveland Division of Air Pollution Control
1925 St. Clair
Cleveland, OH 44114
(216) 664-2324

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. 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. **All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) with respect to emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:**
 - (a) Written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations ; (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. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Part III of this Title V permit, 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. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation

occurred, describe each deviation, and provide the magnitude and duration of each deviation. These 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 (in part) of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations. See B.6 below if no deviations occurred during the quarter.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i), (ii) and (iii))

- (b) Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the deviation reporting requirements for this Title V permit, written reports that identify each malfunction that occurred during each calendar quarter shall be submitted, at a minimum, quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year, and shall cover the previous calendar quarters.

In identifying each deviation caused by a malfunction, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Also, if a deviation caused by a malfunction is identified in a written report submitted pursuant to paragraph (a) above, a separate report is not required for that malfunction pursuant to this paragraph. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing, at a minimum, on a quarterly basis.

Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation, operational restriction, and control device operating parameter limitation shall be reported in the same manner as described above for malfunctions. These written reports for malfunctions (and scheduled maintenance projects, if appropriate) shall satisfy the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations.

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

iii. For monitoring, record keeping, and reporting requirements:

Written reports that 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. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and

duration of each deviation. 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 (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) 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 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. 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.
- 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 (i) 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, (ii) the probable cause of such deviations, and (iii) 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. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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 Enforcable Section

1. Applicable Rule/Requirements:
40 CFR Part 63, Subpart KK
2. Emission Limitations:
This facility shall be established as an area source with respect to 40 CFR Part 63 Subpart KK. Accordingly, the permittee agrees to comply with the following limitations, which are found in 40 CFR Parts 63.820(a)(2)(i) and (a)(2)(ii):
 - a. This facility shall use less than 9.1 Mg (10 tons) per each rolling, 12-month period of each hazardous air pollutant (HAP), including materials used for source categories or purposes other than printing and publishing.
 - b. This facility shall use less than 22.7 Mg (25 tons) per each rolling, 12-month period of any combination of HAPs, including materials used for source categories or purposes other than printing and publishing.
 - c. The following materials may be excluded from the limitations: material used in routine janitorial or facility grounds maintenance, personal uses by employees or other persons, the use of products for the purpose of maintaining electric, propane, gasoline and diesel powered motor vehicles operated by the facility, and the use of HAP contained in intake water (used for processing or non contact cooling) or intake air (used either as compressed air or for combustion).
 - d. If either of the thresholds listed in (a) or (b) are exceeded for any rolling, 12-month period (without first obtaining and complying with other limitations that keep its potential to emit HAP below major source levels), 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, this facility would be subject to the provisions of 40 CFR Part 63, Subpart KK as noted in paragraph (a)(1) of 40 CFR Part 63.820 and would no longer be eligible to use the provisions of 40 CFR Part 63.820(a)(2), even if in subsequent 12-month periods the facility uses less HAP than the thresholds in (a) or (b).
3. Monitoring and/or Record Keeping Requirements:
The permittee shall collect and record the following information each month for the facility:
 - a. The name and identification number of each HAP-containing material employed.
 - b. The individual HAP content for each HAP-containing material, in pounds of individual HAP per pound of material.
 - c. The total combined HAP content for each HAP-containing material, in pounds of combined HAPs per pound of material [sum all the individual HAP contents from (b)].
 - d. The number of pounds of each HAP-containing material employed.
 - e. The total individual HAP usage from all HAP-containing materials, in pounds or tons [for each HAP, the sum of (b) times (d) for each material].
 - f. The total combined HAP usage from all HAP-containing materials, in pounds or tons [the sum of (c) times (d) for each material].
 - g. The rolling, 12-month summation of usage for each individual HAP, in pounds or tons [the information for the current month and the preceding eleven calendar months].
 - h. The rolling, 12-month summation of usage for total combined HAPs, in pounds or tons [the information for the current month and the preceding eleven calendar months].

* A listing of the HAPs can be found in Section 112(b) of Title III of the Clean Air Act. This information does not have to be kept on a individual emissions unit basis.
4. All asbestos renovation and demolition activities conducted at this facility shall be performed in accordance with the applicable requirements specified in 40 CFR Part 61 and OAC Chapter 3745-20.

B. State Only Enforceable Section

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

B002 - steam generator;
Z001 - starch kitchen;
Z002 - pneumatic scrap handling system;
Z003 - plate room;
Z004 - Sheeter 1;
Z005 - Sheeter 2;
Z006 - die cutters;
Z007 - aerator/jogger;
Z008 - firewater pump;
Z009 - paved roadways and parking areas;
Z010 - Gluer 1;
Z011 - Gluer 2;
Z012 - Gluer 3;
Z013 - Gluer 4;
Z014 - Gluer 5;
Z015 - bander; and
Z016 - palletizers.

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: Web Offset Press No. 1 (K002)

Activity Description: Non-heatset, web, offset lithographic printing press (No. 1) with EB and UV curing capabilities.

A. State and Federally 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>
non-heatset, web, offset lithographic printing press (no.1) with electronic beam and ultraviolet curing (radiation)	OAC rule 3745-21-07(G)(2)	The pounds of organic compounds (OC)/hour emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). OC emissions shall not exceed 40 pounds/day.
	OAC rule 3745-31-05(A)(3) (PTI # 13-2019)	OC emissions shall not exceed 5.0 pounds/hour. OC emissions shall not exceed 21.9 tons/year. no visible emissions over 5 percent opacity See A.I.2.a below.

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the oven stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.
2. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. The company identification for each coating, ink, fountain solution organic compound additive (FSOCA) and cleanup material employed.
 - b. The number of gallons of each coating, ink, FSOCA, photochemically reactive cleanup material, and nonphotochemically reactive cleanup material employed.
 - c. The organic compound content of each coating, ink, FSOCA, photochemically reactive cleanup material, and nonphotochemically reactive cleanup material, in pounds per gallon.
 - d. The total OC emission rate from all inks, coatings, FSOCAs and photochemically reactive cleanup materials, in pounds per day;
 - e. The total OC emission rate from all inks, coatings, FSOCAs and all cleanup materials, in pounds per day;
 - f. The total number of hours the emissions unit was in operation.
 - g. The average hourly organic compound emission rate for all coatings, inks, FSOCA and all cleanup materials (i.e., the sum of (b)x(c)/(f)), in pounds per hour (average).

IV. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the oven stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.
2. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. An identification of each day during which the average hourly organic compound emissions from the coatings, inks, FSOCA and all cleanup materials exceeded 5.0 pounds/hour, and the actual average hourly organic compound emissions for each such day.
 - b. An identification of each day during which the organic compound emissions from the inks, coatings, FSOCAs and photochemically reactive cleanup materials exceeded 40 pounds/day, and the actual organic compound emission rate for each such day.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Term and Condition A.1.c.ii.

V. Testing Requirements

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

1.a Emission Limitation:
OC emissions shall not exceed 5.0 pounds/hour.

Applicable Compliance Method:

Compliance may be determined based upon the records required pursuant to Section A.III.1. If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25.

1.b Emission Limitation:
no visible emissions over 5 percent opacity

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

1.c Emission Limitation:
OC emissions shall not exceed 40 pounds/day.

Applicable Compliance Method:

Compliance may be determined based upon the records required pursuant to Section A.III.1.

1.d Emission Limitation:
OC emissions shall not exceed 21.9 tons/year.

Applicable Compliance Method:

The annual emission limitation was established by multiplying the hourly emission rate by 8760 hours of operation per year and dividing by 2000 pounds per ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the pounds per hour limitation.

2. Formulation data or USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the OC contents of the coatings and inks. Formulation data shall be used to determine the OC contents of the FSOCA's and cleanup materials.

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>
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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: Web Offset Press No. 2 (K003)

Activity Description: Non-heatset, web, offset lithographic printing press (No. 2) with EB and UV curing capabilities.

A. State and Federally 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>
non-heatset, web, offset lithographic printing press (no.2) with electronic beam and ultraviolet curing (radiation)	OAC rule 3745-21-07(G)(2)	The pounds of organic compounds (OC)/hour emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). OC emissions shall not exceed 40 pounds/day.
	OAC rule 3745-31-05(A)(3) (PTI # 13-2213)	OC emissions shall not exceed 5.0 pounds/hour.
		OC emissions shall not exceed 21.9 tons/year.
		no visible emissions over 5 percent opacity
		See A.I.2.a below.

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the oven stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.
2. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. The company identification for each coating, ink, fountain solution organic compound additive (FSOCA) and cleanup material employed.
 - b. The number of gallons of each coating, ink, FSOCA, photochemically reactive cleanup material, and nonphotochemically reactive cleanup material employed.
 - c. The organic compound content of each coating, ink, FSOCA, photochemically reactive cleanup material, and nonphotochemically reactive cleanup material, in pounds per gallon.
 - d. The total OC emission rate from all inks, coatings, FSOCA and photochemically reactive cleanup materials, in pounds per day;
 - e. The total OC emission rate from all inks, coatings, FSOCA and all cleanup materials, in pounds per day;
 - f. The total number of hours the emissions unit was in operation.
 - g. The average hourly organic compound emission rate for all coatings, inks, FSOCA and all cleanup materials (i.e., the sum of (b)x(c)/(f)), in pounds per hour (average).

IV. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the oven stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.
2. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. An identification of each day during which the average hourly organic compound emissions from the coatings, inks, FSOCA and all cleanup materials exceeded 5.0 pounds/hour, and the actual average hourly organic compound emissions for each such day.
 - b. An identification of each day during which the organic compound emissions from the inks, coatings, FSOCA and photochemically reactive cleanup materials exceeded 40 pounds/day, and the actual organic compound emission rate for each such day.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Term and Condition A.1.c.ii.

V. Testing Requirements

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

1.a Emission Limitation:
OC emissions shall not exceed 5.0 pounds/hour.

Applicable Compliance Method:

Compliance may be determined based upon the records required pursuant to Section A.III.1. If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25.

1.b Emission Limitation:
no visible emissions over 5 percent opacity

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

1.c Emission Limitation:
OC emissions shall not exceed 40 pounds/day.

Applicable Compliance Method:

Compliance shall be determined based upon the records required pursuant to Section A.III.1.

1.d Emission Limitation:
OC emissions shall not exceed 21.9 tons/year.

Applicable Compliance Method:

The annual emission limitation was established by multiplying the hourly emission rate by 8760 hours of operation per year and dividing by 2000 pounds per ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the pounds per hour limitation.

2. Formulation data or USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the OC contents of the coatings and inks. Formulation data shall be used to determine the OC contents of the FSOCA's and cleanup materials.

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>
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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: Sheetfed Offset Press KBA97 (K008)

Activity Description: Non-heatset, sheetfed, offset lithographic printing press (KBA97)

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>
non-heatset, sheetfed, offset lithographic printing press (KBA97)	OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8 pounds/hour and 40 pounds/day on any day when photochemically reactive materials are used.
	OAC rule 3745-31-05(A)(3) (PTI#13-3300)	See A.I.2.a and A.I.2.b below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2).

2. Additional Terms and Conditions

- 2.a OC emissions shall not exceed 91.7 pounds/hour on any day when only nonphotochemically reactive materials are used.

This emission limitation reflects the potential to emit for this emissions unit. Therefore, no additional monitoring, record keeping and/or reporting requirements are necessary to ensure compliance with this emission limitation.

- 2.b OC emissions shall not exceed 76.9 tons/rolling, 12-month period.

II. Operational Restrictions

1. The OC content of all the inks shall not exceed 30 percent, by weight, as a rolling, 12-month volume-weighted average.
2. The maximum annual ink usage for this emissions unit shall not exceed 324,900 pounds, based upon a rolling, 12-month summation of the monthly ink usage figures.
3. The OC content of all the coatings shall not exceed 10 percent, by weight, as a rolling, 12-month volume-weighted average.
4. The maximum annual coating usage for this emissions unit shall not exceed 618,450 pounds, based upon a rolling, 12-month summation of the coating usage figures.

II. Operational Restrictions (continued)

5. The maximum annual fountain solutions organic compound additive (FSOCA) usage for this emissions unit shall not exceed 50,930 pounds, based upon a rolling, 12-month summation of the FSOCA usage figures.
6. The maximum annual cleanup material usage for this emissions unit shall not exceed 36,200 pounds, based upon a rolling, 12-month summation of the cleanup material usage figures.
7. The permittee shall operate the chiller system to refrigerate the fountain solution while the press is running production.
8. The permittee shall store all spent OC containing cleaning materials and cleaning rags in covered containers.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. The company identification of each ink, coating, FSOCA and cleanup material.
 - b. Documentation on whether or not each ink, coating, FSOCA and cleanup material is a photochemically reactive material.
 - c. The amount of each ink, coating, FSOCA, photochemically reactive cleanup material, and nonphotochemically reactive cleanup material employed, in gallons and pounds.
 - d. The OC content of each ink, coating, FSOCA, photochemically reactive cleanup material, and nonphotochemically reactive cleanup material employed, in pounds per gallon and percent, by weight.
 - e. For each day during which a photochemically reactive material is employed, the total OC emission rate from all inks, coatings, FSOCA and photochemically reactive cleanup materials, in pounds per day.
 - f. For each day during which a photochemically reactive material is employed, the total number of hours the emissions unit was in operation.
 - g. For each day during which a photochemically reactive material is employed, the average hourly OC emission rate for all inks, coatings, FSOCA and photochemically reactive cleanup materials, in pounds/hour, calculated as (e)/(f).
 - h. Documentation on whether or not the chiller system, used to refrigerate the fountain solution, was in service when the emissions unit was in operation.

(Note: The information in Section A.III.2 must be for the inks, coatings, and FSOCA, as employed, including any thinning solvents added at the emissions unit.)

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

2. The permittee shall collect and record the following information for each month for this emissions unit:
 - a. The total usage rate for all inks employed, in pounds.
 - b. The total usage rate for all coatings employed, in pounds.
 - c. The total usage rate for all FSOCA employed, in pounds.
 - d. The total usage rate for all cleanup materials employed, in pounds.
 - e. The total OC emission rate for all coatings, inks, FSOCA, and cleanup materials employed, in pounds (Based on a 95 percent organic solvent retention for inks and 100 percent organic solvent evaporation for coatings, FSOCA and cleanup materials. If the permittee sends waste off-site for waste disposal, the permittee may take a credit for that in emission calculations, provided that the permittee keeps records to calculate the total amount of OC's in the waste disposed of from this emissions unit).
 - f. The rolling, 12-month volume-weighted average OC content for all inks employed, in percent, by weight (i.e., the sum of the volume of each ink, multiplied by the OC content weight percent of each ink, and divided by the total volume of all inks for the rolling, 12-month period).
 - g. The rolling, 12-month volume-weighted average OC content for all coatings employed, in percent, by weight (i.e., the sum of the volume of each coating, multiplied by the OC content weight percent of each coating, and divided by the total volume of all coatings for the rolling, 12-month period).
 - h. The rolling, 12-month summation of ink usage, in pounds.
 - i. The rolling, 12-month summation of coating usage, in pounds.
 - j. The rolling, 12-month summation of FSOCA usage, in pounds.
 - k. The rolling, 12-month summation of cleanup material usage, in pounds.
 - l. The rolling, 12-month summation of OC emissions for all inks, coatings, FSOCA, and cleanup materials, in pounds or tons.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. For the days during which a photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds/hour, and the actual average hourly organic compound emissions for each such day.
 - b. For the days during which a photochemically reactive material was employed, an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds/day, and the actual organic compound emissions for each such day.
 - c. All exceedances of the rolling, 12-month usage limitations for inks, coatings, FSOCA, and cleanup materials.
 - d. All exceedances of the rolling, 12-month volume-weighted OC content limitations for inks and coatings.
 - e. All exceedances of the rolling, 12-month OC emission limitation.
 - f. All time periods when the chiller system, used to refrigerate the fountain solution, was not in service when the emissions unit was in operation.

The deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.ii.

2. The permittee shall also submit annual reports that include the following information for this emissions unit:
 - a. The total usage rate for all inks, coatings, FSOCA's and cleanup materials, in pounds.
 - b. The total OC emissions, in tons.

These reports shall be submitted by March 1 of each year and shall cover the previous calendar year.

V. Testing Requirements

1. Compliance with the emission, usage, and content limitations in these terms and conditions shall be determined in accordance with the following methods:

- 1.a Emission Limitations:
8 pounds/hour and 40 pounds/day of OC emissions on any day when photochemically reactive materials are used

Applicable Compliance Method:

Compliance with the emission limitations may be determined based upon the records required pursuant to Section A.III.1. If required, the permittee shall demonstrate compliance with the hourly OC emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25.

- 1.b Emission Limitation:
OC emissions shall not exceed 76.9 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the emission limitation shall be determined based upon the records required pursuant to Section A.III.2.

V. Testing Requirements (continued)

1.c Emission Limitation:

The OC content of all the inks shall not exceed 30 percent, by weight, as a rolling, 12-month volume-weighted average.

Applicable Compliance Method:

Compliance with the content limitation shall be determined based upon the records required pursuant to Section A.III.2.

1.d Emission Limitation:

The maximum annual ink usage for this emissions unit shall not exceed 324,900 pounds, based upon a rolling, 12-month summation of the monthly ink usage figures.

Applicable Compliance Method:

Compliance with the usage limitation shall be determined based upon the records required pursuant to Section A.III.2.

1.e Emission Limitation:

The OC content of all the coatings shall not exceed 10 percent, by weight, as a rolling, 12-month volume-weighted average.

Applicable Compliance Method:

Compliance with the content limitation shall be determined based upon the records required pursuant to Section A.III.2.

1.f Emission Limitation:

The maximum annual coating usage for this emissions unit shall not exceed 618,450 pounds, based upon a rolling, 12-month summation of the monthly coating usage figures.

Applicable Compliance Method:

Compliance with the usage limitation shall be determined based upon the records required pursuant to Section A.III.2.

1.g Emission Limitation:

The maximum annual fountain solutions organic compound additive (FSOCA) usage for this emissions unit shall not exceed 50,930 pounds, based upon a rolling, 12-month summation of the FSOCA usage figures.

Applicable Compliance Method:

Compliance with the usage limitation shall be determined based upon the records required pursuant to Section A.III.2.

1.h Emission Limitation:

The maximum annual cleanup material usage for this emissions unit shall not exceed 36,200 pounds, based upon a rolling, 12-month summation of the cleanup material usage figures.

Applicable Compliance Method:

Compliance with the usage limitation shall be determined based upon the records required pursuant to Section A.III.2.

1.i Emission Limitation:

91.7 pounds/hour of OC emissions on any day when nonphotochemically reactive materials are used

Applicable Compliance Method:

This emission limitation was established by multiplying the emissions unit's maximum hourly coating, ink, FSOCA, and cleanup material usage rates by the worst case OC contents for the coatings, inks, FSOCA, and cleanup materials. If required, the permittee shall demonstrate compliance with the hourly OC emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25.

V. Testing Requirements (continued)

2. Formulation data or USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the organic compound contents of the coatings and inks. Formulation data shall be used to determine the organic compound contents of the FSOCA and cleanup materials.

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>
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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: Sheetfed Offset Press KBA972 (K009)
Activity Description: Non-heatset, sheetfed, offset lithographic printing press (KBA972)

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>
non-heatset, sheetfed, offset lithographic printing press (KBA972)	OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8 pounds/hour and 40 pounds/day on any day when photochemically reactive materials are used.
	OAC rule 3745-31-05(A)(3) (PTI#13-3300)	See A.I.2.a and A.I.2.b below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2).

2. Additional Terms and Conditions

- 2.a OC emissions shall not exceed 91.7 pounds/hour on any day when only nonphotochemically reactive materials are used.

This emission limitation reflects the potential to emit for this emissions unit. Therefore, no additional monitoring, record keeping and/or reporting requirements are necessary to ensure compliance with this emission limitation.

- 2.b OC emissions shall not exceed 76.9 tons/rolling, 12-month period.

II. Operational Restrictions

1. The OC content of all the inks shall not exceed 30 percent, by weight, as a rolling, 12-month volume-weighted average.
2. The maximum annual ink usage for this emissions unit shall not exceed 324,900 pounds, based upon a rolling, 12-month summation of the monthly ink usage figures.
3. The OC content of all the coatings shall not exceed 10 percent, by weight, as a rolling, 12-month volume-weighted average.
4. The maximum annual coating usage for this emissions unit shall not exceed 618,450 pounds, based upon a rolling, 12-month summation of the coating usage figures.

II. Operational Restrictions (continued)

5. The maximum annual fountain solutions organic compound additive (FSOCA) usage for this emissions unit shall not exceed 50,930 pounds, based upon a rolling, 12-month summation of the FSOCA usage figures.
6. The maximum annual cleanup material usage for this emissions unit shall not exceed 36,200 pounds, based upon a rolling, 12-month summation of the cleanup material usage figures.
7. The permittee shall operate the chiller system to refrigerate the fountain solution while the press is running production.
8. The permittee shall store all spent OC containing cleaning materials and cleaning rags in covered containers.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. The company identification of each ink, coating, FSOCA and cleanup material.
 - b. Documentation on whether or not each ink, coating, FSOCA and cleanup material is a photochemically reactive material.
 - c. The amount of each ink, coating, FSOCA, photochemically reactive cleanup material, and nonphotochemically reactive cleanup material employed, in gallons and pounds.
 - d. The OC content of each ink, coating, FSOCA, photochemically reactive cleanup material, and nonphotochemically reactive cleanup material employed, in pounds per gallon and percent, by weight.
 - e. For each day during which a photochemically reactive material is employed, the total OC emission rate from all inks, coatings, FSOCA and photochemically reactive cleanup materials, in pounds per day.
 - f. For each day during which a photochemically reactive material is employed, the total number of hours the emissions unit was in operation.
 - g. For each day during which a photochemically reactive material is employed, the average hourly OC emission rate for all inks, coatings, FSOCA and photochemically reactive cleanup materials, in pounds/hour, calculated as (e)/(f).
 - h. Documentation on whether or not the chiller system, used to refrigerate the fountain solution, was in service when the emissions unit was in operation.

(Note: The information in Section A.III.2 must be for the inks, coatings, and FSOCA, as employed, including any thinning solvents added at the emissions unit.)

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

2. The permittee shall collect and record the following information for each month for this emissions unit:
 - a. The total usage rate for all inks employed, in pounds.
 - b. The total usage rate for all coatings employed, in pounds.
 - c. The total usage rate for all FSOCA employed, in pounds.
 - d. The total usage rate for all cleanup materials employed, in pounds.
 - e. The total OC emission rate for all coatings, inks, FSOCA, and cleanup materials employed, in pounds (Based on a 95 percent organic solvent retention for inks and 100 percent organic solvent evaporation for coatings, FSOCA and cleanup materials. If the permittee sends waste off-site for waste disposal, the permittee may take a credit for that in emission calculations, provided that the permittee keeps records to calculate the total amount of OC's in the waste disposed of from this emissions unit).
 - f. The rolling, 12-month volume-weighted average OC content for all inks employed, in percent, by weight (i.e., the sum of the volume of each ink, multiplied by the OC content weight percent of each ink, and divided by the total volume of all inks for the rolling, 12-month period).
 - g. The rolling, 12-month volume-weighted average OC content for all coatings employed, in percent, by weight (i.e., the sum of the volume of each coating, multiplied by the OC content weight percent of each coating, and divided by the total volume of all coatings for the rolling, 12-month period).
 - h. The rolling, 12-month summation of ink usage, in pounds.
 - i. The rolling, 12-month summation of coating usage, in pounds.
 - j. The rolling, 12-month summation of FSOCA usage, in pounds.
 - k. The rolling, 12-month summation of cleanup material usage, in pounds.
 - l. The rolling, 12-month summation of OC emissions for all inks, coatings, FSOCA, and cleanup materials, in pounds or tons.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. For the days during which a photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds/hour, and the actual average hourly organic compound emissions for each such day.
 - b. For the days during which a photochemically reactive material was employed, an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds/day, and the actual organic compound emissions for each such day.
 - c. All exceedances of the rolling, 12-month usage limitations for inks, coatings, FSOCA, and cleanup materials.
 - d. All exceedances of the rolling, 12-month volume-weighted OC content limitations for inks and coatings.
 - e. All exceedances of the rolling, 12-month OC emission limitation.
 - f. All time periods when the chiller system, used to refrigerate the fountain solution, was not in service when the emissions unit was in operation.

The deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.ii.

2. The permittee shall also submit annual reports that include the following information for this emissions unit:
 - a. The total usage rate for all inks, coatings, FSOCA and cleanup materials, in pounds.
 - b. The total OC emissions, in tons.

These reports shall be submitted by March 1 of each year and shall cover the previous calendar year.

V. Testing Requirements

1. Compliance with the emission, usage, and content limitations in these terms and conditions shall be determined in accordance with the following methods:

- 1.a Emission Limitations:
8 pounds/hour and 40 pounds/day of OC emissions on any day when photochemically reactive materials are used

Applicable Compliance Method:

Compliance with the emission limitations may be determined based upon the records required pursuant to Section A.III.1. If required, the permittee shall demonstrate compliance with the hourly OC emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25.

- 1.b Emission Limitation:
OC emissions shall not exceed 76.9 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the emission limitation shall be determined based upon the records required pursuant to Section A.III.2.

V. Testing Requirements (continued)

1.c Emission Limitation:

The OC content of all the inks shall not exceed 30 percent, by weight, as a rolling, 12-month volume-weighted average.

Applicable Compliance Method:

Compliance with the content limitation shall be determined based upon the records required pursuant to Section A.III.2.

1.d Emission Limitation:

The maximum annual ink usage for this emissions unit shall not exceed 324,900 pounds, based upon a rolling, 12-month summation of the monthly ink usage figures.

Applicable Compliance Method:

Compliance with the usage limitation shall be determined based upon the records required pursuant to Section A.III.2.

1.e Emission Limitation:

The OC content of all the coatings shall not exceed 10 percent, by weight, as a rolling, 12-month volume-weighted average.

Applicable Compliance Method:

Compliance with the content limitation shall be determined based upon the records required pursuant to Section A.III.2.

1.f Emission Limitation:

The maximum annual coating usage for this emissions unit shall not exceed 618,450 pounds, based upon a rolling, 12-month summation of the monthly coating usage figures.

Applicable Compliance Method:

Compliance with the usage limitation shall be determined based upon the records required pursuant to Section A.III.2.

1.g Emission Limitation:

The maximum annual fountain solutions organic compound additive (FSOCA) usage for this emissions unit shall not exceed 50,930 pounds, based upon a rolling, 12-month summation of the FSOCA usage figures.

Applicable Compliance Method:

Compliance with the usage limitation shall be determined based upon the records required pursuant to Section A.III.2.

1.h Emission Limitation:

The maximum annual cleanup material usage for this emissions unit shall not exceed 36,200 pounds, based upon a rolling, 12-month summation of the cleanup material usage figures.

Applicable Compliance Method:

Compliance with the usage limitation shall be determined based upon the records required pursuant to Section A.III.2.

1.i Emission Limitation:

91.7 pounds/hour of OC emissions on any day when nonphotochemically reactive materials are used

Applicable Compliance Method:

This emission limitation was established by multiplying the emissions unit's maximum hourly coating, ink, FSOCA, and cleanup material usage rates by the worst case OC contents for the coatings, inks, FSOCA, and cleanup materials. If required, the permittee shall demonstrate compliance with the hourly OC emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25.

V. Testing Requirements (continued)

2. Formulation data or USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the organic compound contents of the coatings and inks. Formulation data shall be used to determine the organic compound contents of the FSOCA and cleanup materials.

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>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Flexographic unit No. 1 (K010)

Activity Description: Flexographic printing unit equipped with natural gas fired dryer (Flexo 1)

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 unit (Flexo 1) equipped with natural gas-fired dryer	OAC rule 3745-21-09(Y)	The VOC content of the coatings and inks employed in this emissions unit shall not exceed 40 percent VOC, by volume, of the coating and ink, excluding water or 25 percent, by volume, of the volatile matter in the coating and ink.
	OAC rule 3745-31-05(A)(3) (PTI #13-3333)	See A.I.2.a and A.I.2.b below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(Y).

2. Additional Terms and Conditions

- 2.a VOC emissions shall not exceed 87.1 pounds/hour.

This emission limitation reflects the potential to emit for this emissions unit. Therefore, no additional monitoring, record keeping and/or reporting requirements are necessary to ensure compliance with this emission limitation.

- 2.b VOC emissions shall not exceed 36.6 tons/rolling, 12-month period.

II. Operational Restrictions

1. The VOC content of all the inks shall not exceed 6 percent, by weight, as a rolling, 12-month volume-weighted average.
2. The maximum annual ink usage for this emissions unit shall not exceed 319,138 pounds, based upon a rolling, 12-month summation of the monthly ink usage figures. The maximum usage (pounds) of ink may be exceeded provided the annual VOC emission limitation is not exceeded.
3. The VOC content of all the coatings shall not exceed 13 percent, by weight, as a rolling, 12-month volume-weighted average.

II. Operational Restrictions (continued)

4. The maximum annual coating usage for this emissions unit shall not exceed 373,328 pounds, based upon a rolling, 12-month summation of the monthly coating usage figures. The maximum usage (pounds) of coating may be exceeded provided the annual VOC emission limitation is not exceeded.
5. The maximum annual solvent-based cleanup material usage for this emissions unit shall not exceed 6,859 pounds, based upon a rolling, 12-month summation of the monthly cleanup material usage figures. The maximum usage (pounds) of solvent-based cleanup materials may be exceeded provided the annual VOC emission limitation is not exceeded.
6. The permittee shall store all spent VOC containing cleaning materials and cleaning rags in covered containers.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each month for this emissions unit:
 - a. The company identification of each ink, coating, and cleanup material employed.
 - b. The amount of each ink, coating, and cleanup material employed, in gallons and pounds.
 - c. The VOC content of each ink, coating, and cleanup material employed, in pounds of VOC/gallon, percent, by weight, and percent, by volume.
 - d. The total VOC emissions for all inks, coatings, and cleanup materials, in pounds or tons (Based on a 7 percent organic solvent retention for inks and 100 percent solvent evaporation for coatings and cleanup materials. If the permittee sends waste off-site for waste disposal, the permittee may take credit for that in the emission calculations, provided that the permittee keeps records to calculate the total amount of VOC in the waste disposed of from this emissions unit).
 - e. The rolling, 12-month summation of ink usage, in pounds.
 - f. The rolling, 12-month summation of coating usage, in pounds.
 - g. The rolling, 12-month summation of solvent-based cleanup material usage, in pounds.
 - h. The rolling, 12-month volume-weighted average VOC content for all inks, in percent, by weight (i.e., the sum of the volume of each ink, multiplied by the OC content weight percent of each ink, and divided by the total volume of all inks for the rolling, 12-month period).
 - i. The rolling, 12-month volume-weighted average VOC content for all coatings, in percent, by weight (i.e., the sum of the volume of each coating, multiplied by the OC content weight percent of each coating, and divided by the total volume of all coatings for the rolling, 12-month period).
 - j. The rolling, 12-month summation of VOC emissions for all inks, coatings, and cleanup materials, in pounds or tons.

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.

IV. Reporting Requirements (continued)

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following:
 - a. The rolling, 12-month usage limitations for inks, coatings, and solvent-based cleanup materials, in pounds.
 - b. The rolling, 12-month volume-weighted average VOC content limitations for all inks and coatings.
 - c. The rolling, 12-month VOC emission limitation for all inks, coatings, and cleanup materials.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Term and Condition A.1.c.ii.

3. The permittee shall also submit annual reports that specify the following information for this emissions unit:
 - a. The total usage rate for all inks, coatings, and solvent-based cleanup materials, in pounds.
 - b. The total VOC emissions, in tons.

These reports shall be submitted by March 1 of each year and shall cover the previous calendar year.

V. Testing Requirements

1. Compliance with the emission, usage, and VOC content limitations in these terms and conditions shall be determined in accordance with the following methods:
 - 1.a Emission Limitation:
The VOC content of the inks and coatings shall not exceed 40 percent VOC by volume, excluding water or 25 percent by volume, of the volatile matter.

Applicable Compliance Method:

Compliance with the applicable emission limitation shall be determined based upon the records required pursuant to Section A.III.1.

- 1.b Emission Limitation:
VOC emissions shall not exceed 87.1 pounds/hour.

Applicable Compliance Method:

This emission limitation was established by multiplying the emissions unit's maximum hourly coating, ink, and cleanup material usage rates by the worst case OC contents for the coatings, inks, and cleanup materials. The hourly potential to emit for this emissions unit shall be verified based upon the records required pursuant to Section A.III.1 and use of the following equation:

$$HE = \text{Sum} (\text{muse } i, * \text{VOC } \% i * (100\text{-RF}) / \text{MH})$$

Where:

HE = hourly emissions, in pounds per hour;

i = subscript denoting individual coating;

muse = monthly usage of each individual coating or ink, in pounds/month

VOC% =VOC content for each individual material, in weight percent;

RF = retention factor, 7% for ink and 0% for coating;

MH =total hours the press was in operation during the month

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25.

V. Testing Requirements (continued)

1.c Emission Limitation:

VOC emissions shall not exceed 36.6 tons/rolling, 12-month period.

Applicable Compliance Method:

Compliance with this emission limitation shall be determined based upon the records required pursuant to Section A.III.1.

1.d Emission Limitation:

The VOC content of all the inks shall not exceed 6 percent, by weight, as a rolling, 12-month volume-weighted average.

Applicable Compliance Method:

Compliance with this emission limitation shall be determined based upon the records required pursuant to Section A.III.1.

1.e Emission Limitation:

The maximum annual ink usage for this emissions unit shall not exceed 319,138 pounds, based upon a rolling, 12-month summation of the monthly ink usage figures. The maximum usage (pounds) of ink may be exceeded provided the annual VOC emission limitation is not exceeded.

Applicable Compliance Method:

Compliance with this emission limitation shall be determined based upon the records required pursuant to Section A.III.1.

1.f Emission Limitation:

The VOC content of all the coatings shall not exceed 13 percent, by weight, as a rolling, 12-month volume-weighted average.

Applicable Compliance Method:

Compliance with this emission limitation shall be determined based upon the records required pursuant to Section A.III.1.

1.g Emission Limitation:

The maximum annual coating usage for this emissions unit shall not exceed 373,328 pounds, based upon a rolling, 12-month summation of the coating usage figures. The maximum usage (pounds) of coating may be exceeded provided the annual VOC emission limitation is not exceeded.

Applicable Compliance Method:

Compliance with this emission limitation shall be determined based upon the records required pursuant to Section A.III.1.

1.h Emission Limitation:

The maximum annual solvent-based cleanup material usage for this emissions unit shall not exceed 6,859 pounds, based upon a rolling, 12-month summation of the cleanup material usage figures. The maximum usage (pounds) of solvent-based cleanup materials may be exceeded provided the annual VOC emission limitation is not exceeded.

Applicable Compliance Method:

Compliance with this emission limitation shall be determined based upon the records required pursuant to Section A.III.1.

- 2.** USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to 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.

Facility Name: **Jefferson Smurfit Corporation (U.S.) Solon Plant**
Facility ID: **13-18-53-2181**
Emissions Unit: **Flexographic unit No. 1 (K010)**

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 unit (Flexo 1) equipped with natural gas-fired dryer		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for this emissions unit K010 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 Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

a. Pollutant: Ammonia
 TLV (ug/m3): 17,000
 Maximum Hourly Emission Rate (lbs/hr): 0.17
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 11.5
 MAGLC (ug/m3): 405

b. Pollutant: Isopropyl Alcohol
 TLV (ug/m3): 983,000
 Maximum Hourly Emission Rate (lbs/hr): 0.36
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 24.1
 MAGLC (ug/m3): 23,405

c. Pollutant: Monoethanolamine
 TLV (ug/m3): 8,000
 Maximum Hourly Emission Rate (lbs/hr): 0.26
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 17.7
 MAGLC (ug/m3): 190

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

e. Pollutant: Ethylene Glycol
TLV (ug/m3): 127,000
Maximum Hourly Emission Rate (lbs/hr): 0.08
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 5.7
MAGLC (ug/m3): 3,024

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic 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 applying 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 for 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.

3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still 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 its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where 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: Flexographic unit No. 2 (K011)

Activity Description: Flexographic printing unit equipped with natural gas fired dryer (Flexo 2)

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 unit (Flexo 2) equipped with natural gas-fired dryer	OAC rule 3745-21-09(Y)	The VOC content of the coatings and inks employed in this emissions unit shall not exceed 40 percent VOC, by volume, of the coating and ink, excluding water or 25 percent, by volume, of the volatile matter in the coating and ink.
	OAC rule 3745-31-05(A)(3) (PTI #13-3414)	See A.I.2.a and A.I.2.b below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(Y).

2. Additional Terms and Conditions

- 2.a VOC emissions shall not exceed 87.1 pounds/hour.

This emission limitation reflects the potential to emit for this emissions unit. Therefore, no additional monitoring, record keeping and/or reporting requirements are necessary to ensure compliance with this emission limitation.

- 2.b VOC emissions shall not exceed 36.6 tons/rolling, 12-month period.

II. Operational Restrictions

1. The VOC content of all the inks shall not exceed 6 percent, by weight, as a rolling, 12-month volume-weighted average.
2. The maximum annual ink usage for this emissions unit shall not exceed 319,138 pounds, based upon a rolling, 12-month summation of the monthly ink usage figures. The maximum usage (pounds) of ink may be exceeded provided the annual VOC emission limitation is not exceeded.
3. The VOC content of all the coatings shall not exceed 13 percent, by weight, as a rolling, 12-month volume-weighted average.

II. Operational Restrictions (continued)

4. The maximum annual coating usage for this emissions unit shall not exceed 373,328 pounds, based upon a rolling, 12-month summation of the monthly coating usage figures. The maximum usage (pounds) of coating may be exceeded provided the annual VOC emission limitation is not exceeded.
5. The maximum annual solvent-based cleanup material usage for this emissions unit shall not exceed 6,859 pounds, based upon a rolling, 12-month summation of the monthly cleanup material usage figures. The maximum usage (pounds) of solvent-based cleanup materials may be exceeded provided the annual VOC emission limitation is not exceeded.
6. The permittee shall store all spent VOC containing cleaning materials and cleaning rags in covered containers.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each month for this emissions unit:
 - a. The company identification of each ink, coating, and cleanup material employed.
 - b. The amount of each ink, coating, and cleanup material employed, in gallons and pounds.
 - c. The VOC content of each ink, coating, and cleanup material employed, in pounds of VOC/gallon, percent, by weight, and percent, by volume.
 - d. The total VOC emissions for all inks, coatings, and cleanup materials, in pounds or tons (Based on a 7 percent organic solvent retention for inks and 100 percent solvent evaporation for coatings and cleanup materials. If the permittee sends waste off-site for waste disposal, the permittee may take credit for that in the emission calculations, provided that the permittee keeps records to calculate the total amount of VOC in the waste disposed of from this emissions unit).
 - e. The rolling, 12-month summation of ink usage, in pounds.
 - f. The rolling, 12-month summation of coating usage, in pounds.
 - g. The rolling, 12-month summation of solvent-based cleanup material usage, in pounds.
 - h. The rolling, 12-month volume-weighted average VOC content for all inks, in percent, by weight (i.e., the sum of the volume of each ink, multiplied by the OC content weight percent of each ink, and divided by the total volume of all inks for the rolling, 12-month period).
 - i. The rolling, 12-month volume-weighted average VOC content for all coatings, in percent, by weight (i.e., the sum of the volume of each coating, multiplied by the OC content weight percent of each coating, and divided by the total volume of all coatings for the rolling, 12-month period).
 - j. The rolling, 12-month summation of VOC emissions for all inks, coatings, and cleanup materials, in pounds or tons.

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.

IV. Reporting Requirements (continued)

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following:
 - a. The rolling, 12-month usage limitations for inks, coatings, and solvent-based cleanup materials, in pounds.
 - b. The rolling, 12-month volume-weighted average VOC content limitations for all inks and coatings.
 - c. The rolling, 12-month VOC emission limitation for all inks, coatings, and cleanup materials.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Term and Condition A.1.c.ii.

3. The permittee shall also submit annual reports that specify the following information for this emissions unit:
 - a. The total usage rate for all inks, coatings, and solvent-based cleanup materials, in pounds.
 - b. The total VOC emissions, in tons.

These reports shall be submitted by March 1 of each year and shall cover the previous calendar year.

V. Testing Requirements

1. Compliance with the emission, usage, and VOC content limitations in these terms and conditions shall be determined in accordance with the following methods:
 - 1.a Emission Limitation:
The VOC content of the inks and coatings shall not exceed 40 percent VOC by volume, excluding water or 25 percent by volume, of the volatile matter.

Applicable Compliance Method:

Compliance with the applicable emission limitation shall be determined based upon the records required pursuant to Section A.III.1.

- 1.b Emission Limitation:
VOC emissions shall not exceed 87.1 pounds/hour.

Applicable Compliance Method:

This emission limitation was established by multiplying the emissions unit's maximum hourly coating, ink, and cleanup material usage rates by the worst case OC contents for the coatings, inks, and cleanup materials. The hourly potential to emit for this emissions unit shall be verified based upon the records required pursuant to Section A.III.1 and use of the following equation:

$$HE = \text{Sum} (\text{muse } i, * \text{VOC \% } i * (100\text{-RF}) / \text{MH})$$

Where:

HE = hourly emissions, in pounds per hour;

i = subscript denoting individual coating;

muse = monthly usage of each individual coating or ink, in pounds/month

VOC% =VOC content for each individual material, in weight percent;

RF = retention factor, 7% for ink and 0% for coating;

MH =total hours the press was in operation during the month

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25.

V. Testing Requirements (continued)

1.c Emission Limitation:

VOC emissions shall not exceed 36.6 tons/rolling, 12-month period.

Applicable Compliance Method:

Compliance with this emission limitation shall be determined based upon the records required pursuant to Section A.III.1.

1.d Emission Limitation:

The VOC content of all the inks shall not exceed 6 percent, by weight, as a rolling, 12-month volume-weighted average.

Applicable Compliance Method:

Compliance with this emission limitation shall be determined based upon the records required pursuant to Section A.III.1.

1.e Emission Limitation:

The maximum annual ink usage for this emissions unit shall not exceed 319,138 pounds, based upon a rolling, 12-month summation of the monthly ink usage figures. The maximum usage (pounds) of ink may be exceeded provided the annual VOC emission limitation is not exceeded.

Applicable Compliance Method:

Compliance with this emission limitation shall be determined based upon the records required pursuant to Section A.III.1.

1.f Emission Limitation:

The VOC content of all the coatings shall not exceed 13 percent, by weight, as a rolling, 12-month volume-weighted average.

Applicable Compliance Method:

Compliance with this emission limitation shall be determined based upon the records required pursuant to Section A.III.1.

1.g Emission Limitation:

The maximum annual coating usage for this emissions unit shall not exceed 373,328 pounds, based upon a rolling, 12-month summation of the coating usage figures. The maximum usage (pounds) of coating may be exceeded provided the annual VOC emission limitation is not exceeded.

Applicable Compliance Method:

Compliance with this emission limitation shall be determined based upon the records required pursuant to Section A.III.1.

1.h Emission Limitation:

The maximum annual solvent-based cleanup material usage for this emissions unit shall not exceed 6,859 pounds, based upon a rolling, 12-month summation of the cleanup material usage figures. The maximum usage (pounds) of solvent-based cleanup materials may be exceeded provided the annual VOC emission limitation is not exceeded.

Applicable Compliance Method:

Compliance with this emission limitation shall be determined based upon the records required pursuant to Section A.III.1.

- 2.** USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to 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.

Facility Name: **Jefferson Smurfit Corporation (U.S.) Solon Plant**
Facility ID: **13-18-53-2181**
Emissions Unit: **Flexographic unit No. 2 (K011)**

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 unit (Flexo 2) equipped with natural gas-fired dryer		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for this emissions unit K011 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 Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

a. Pollutant: Ammonia
 TLV (ug/m3): 17,000
 Maximum Hourly Emission Rate (lbs/hr): 0.17
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 11.5
 MAGLC (ug/m3): 405

b. Pollutant: Isopropyl Alcohol
 TLV (ug/m3): 983,000
 Maximum Hourly Emission Rate (lbs/hr): 0.36
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 24.1
 MAGLC (ug/m3): 23,405

c. Pollutant: Monoethanolamine
 TLV (ug/m3): 8,000
 Maximum Hourly Emission Rate (lbs/hr): 0.26
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 17.7
 MAGLC (ug/m3): 190

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

e. Pollutant: Ethylene Glycol
TLV (ug/m3): 127,000
Maximum Hourly Emission Rate (lbs/hr): 0.08
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 5.7
MAGLC (ug/m3): 3,024

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic 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 applying 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 for 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.

3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still 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 its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where 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: Asitrade Corrugating Machine 1 (P001)

Activity Description: Corrugating machine with capability to glue pre-printed sheet or pre-printed web.

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>
Asitrade corrugating machine with capability to glue pre-printed sheet or pre-printed web (Machine 1)	OAC rule 3745-21-09(F)	The VOC content, as applied, of each coating (adhesive) employed shall not exceed 2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents.
	OAC rule 3745-31-05(A)(3) (PTI #13-3564)	8.58 pounds/hour of VOC emissions (See A.I.2.a below.)
		15.0 tons of VOC emissions/rolling, 12-month period

2. Additional Terms and Conditions

- 2.a This emission limitation reflects the potential to emit for this emissions unit. Therefore, no additional monitoring, record keeping and/or reporting requirements are necessary to ensure compliance with this emission limitation.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month:
 - a. The company name and identification number of each adhesive, as applied.
 - b. The amount of each adhesive employed, in gallons.
 - c. The VOC content of each adhesive (excluding water and exempt solvents), in pounds/gallon, as applied.
 - d. The total VOC emissions for all adhesives, in pounds or tons (based on a 100 percent VOC evaporation rate).
 - e. The rolling, 12-month summation of the VOC emissions, in tons.

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 that identify all exceedances of the rolling, 12-month VOC emission limitation. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Term and Condition A.1.c.ii.
3. The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by March 1 of each year.

V. Testing Requirements

1. Compliance with the emission limitations in these terms and conditions shall be determined in accordance with the following methods:
 - 1.a Emission Limitation:
2.9 lbs of VOC/gallon coating, excluding water and exempt solvents

Applicable Compliance Method:
Compliance shall be determined based upon the records required pursuant to Section A.III.1.
 - 1.b Emission Limitation:
8.58 pounds/hour of VOC emissions

Applicable Compliance Method:
This emission limitation was established by multiplying the emissions unit's maximum hourly adhesive application rate by the worst case adhesive VOC content. If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25.
 - 1.c Emission Limitation:
15.0 tons of VOC emissions/rolling, 12-month period

Applicable Compliance Method:
Compliance shall be determined based upon the records required pursuant to Section A.III.1.
2. USEPA Method 24 shall be used to determine the VOC contents for the coatings. If, pursuant to Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

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>
Asitrade corrugating machine with capability to glue pre-printed sheet or pre-printed web		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for this emissions unit P001 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 Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):
 - a. Pollutant: Vinyl Acetate
 TLV (ug/m3): 35000
 Maximum Hourly Emission Rate (lbs/hr): 0.41
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 31.88
 MAGLC (ug/m3): 833
 - b. Pollutant: Methyl Alcohol
 TLV (ug/m3): 262000
 Maximum Hourly Emission Rate (lbs/hr): 0.24
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 18.32
 MAGLC (ug/m3): 6238
 - c. Pollutant: Formaldehyde
 TLV (ug/m3): 370
 Maximum Hourly Emission Rate (lbs/hr): 0.10
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 7.98
 MAGLC (ug/m3): 9

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

d. Pollutant: Toluene
TLV (ug/m3): 188000
Maximum Hourly Emission Rate (lbs/hr): 0.03
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 2.54
MAGLC (ug/m3): 4476

e. Pollutant: Acetaldehyde
TLV (ug/m3): 45000
Maximum Hourly Emission Rate (lbs/hr): 0.02
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 1.83
MAGLC (ug/m3): 1071

f. Pollutant: Ethylene Glycol
TLV (ug/m3): 100000
Maximum Hourly Emission Rate (lbs/hr): 0.01
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 0.58
MAGLC (ug/m3): 2381

g. Pollutant: Hydroquinone
TLV (ug/m3): 2000
Maximum Hourly Emission Rate (lbs/hr): 0.001
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 0.09
MAGLC (ug/m3): 48

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic 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 applying 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 for 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.

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

3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still 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 its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where 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: Asitrade Corrugating Machine 2 (P002)

Activity Description: Corrugating machine with capability to glue pre-printed sheet or pre-printed web.

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>
Asitrade corrugating machine with capability to glue pre-printed sheet or pre-printed web (Machine 2)	OAC rule 3745-21-09(F)	The VOC content, as applied, of each coating (adhesive) employed shall not exceed 2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents.
	OAC rule 3745-31-05(A)(3) (PTI #13-3729)	8.58 pounds/hour of VOC emissions (See A.I.2.a below.)
		15.0 tons of VOC emissions/rolling, 12-month period

2. Additional Terms and Conditions

- 2.a This emission limitation reflects the potential to emit for this emissions unit. Therefore, no additional monitoring, record keeping and/or reporting requirements are necessary to ensure compliance with this emission limitation.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month:
 - a. The company name and identification number of each adhesive, as applied.
 - b. The amount of each adhesive employed, in gallons.
 - c. The VOC content of each adhesive (excluding water and exempt solvents), in pounds/gallon, as applied.
 - d. The total VOC emissions for all adhesives, in pounds or tons (based on a 100 percent VOC evaporation rate).
 - e. The rolling, 12-month summation of the VOC emissions, in tons.

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 that identify all exceedances of the rolling, 12-month VOC emission limitation. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Term and Condition A.1.c.ii.
3. The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by March 1 of each year.

V. Testing Requirements

1. Compliance with the emission limitations in these terms and conditions shall be determined in accordance with the following methods:
 - 1.a Emission Limitation:
2.9 lbs of VOC/gallon coating, excluding water and exempt solvents

Applicable Compliance Method:
Compliance shall be determined based upon the records required pursuant to Section A.III.1.
 - 1.b Emission Limitation:
8.58 pounds/hour of VOC emissions

Applicable Compliance Method:
This emission limitation was established by multiplying the emissions unit's maximum hourly adhesive application rate by the worst case adhesive VOC content. If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25.
 - 1.c Emission Limitation:
15.0 tons of VOC emissions/rolling, 12-month period

Applicable Compliance Method:
Compliance shall be determined based upon the records required pursuant to Section A.III.1.
2. USEPA Method 24 shall be used to determine the VOC contents for the coatings. If, pursuant to Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

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>
Asitrade corrugating machine with capability to glue pre-printed sheet or pre-printed web		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for this emissions unit P002 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 Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):
 - a. Pollutant: Vinyl Acetate
 TLV (ug/m3): 35000
 Maximum Hourly Emission Rate (lbs/hr): 0.41
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 31.88
 MAGLC (ug/m3): 833
 - b. Pollutant: Methyl Alcohol
 TLV (ug/m3): 262000
 Maximum Hourly Emission Rate (lbs/hr): 0.24
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 18.32
 MAGLC (ug/m3): 6238
 - c. Pollutant: Formaldehyde
 TLV (ug/m3): 370
 Maximum Hourly Emission Rate (lbs/hr): 0.10
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 7.98
 MAGLC (ug/m3): 9

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

d. Pollutant: Toluene
TLV (ug/m3): 188000
Maximum Hourly Emission Rate (lbs/hr): 0.03
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 2.54
MAGLC (ug/m3): 4476

e. Pollutant: Acetaldehyde
TLV (ug/m3): 45000
Maximum Hourly Emission Rate (lbs/hr): 0.02
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 1.83
MAGLC (ug/m3): 1071

f. Pollutant: Ethylene Glycol
TLV (ug/m3): 100000
Maximum Hourly Emission Rate (lbs/hr): 0.01
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 0.58
MAGLC (ug/m3): 2381

g. Pollutant: Hydroquinone
TLV (ug/m3): 2000
Maximum Hourly Emission Rate (lbs/hr): 0.001
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 0.09
MAGLC (ug/m3): 48

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic 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 applying 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 for 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.

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

3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still 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 its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where 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

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