



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

01/30/02

CERTIFIED MAIL

RE: Final Title V Chapter 3745-77 permit

16-77-00-0105
Pechiney Plastic Packaging Inc
FRED M. CLEARY
1972 AKRON PENINSULA RD.
AKRON, OH 44313

Dear FRED M. CLEARY:

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

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

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

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

If you have any questions, please contact Akron Air Pollution Control.

Very truly yours,

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

cc: Akron Air Pollution Control
File, DAPC PMU



State of Ohio Environmental Protection Agency

FINAL TITLE V PERMIT

Issue Date: 01/30/02	Effective Date: 01/30/02	Expiration Date: 01/30/07
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This document constitutes issuance of a Title V permit for Facility ID: 16-77-00-0105 to:
Pechiney Plastic Packaging Inc
1972 AKRON PENINSULA RD.
NONE
AKRON, OH 44313

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

K003 (W & H 1) 6-COLOR FLEXOGRAPHIC PRINTING PRESS/OUTBOARD ROTOGRAVURE STATION	PRESS/OUTBOARD LAMINATION AND BACKSIDE PRINTING STATION	K016 (PC VISION) 8-COLOR FLEXOGRAPHIC PRINTING PRESS - MEDIUM WIDTH/ OUTBOARD FLEXOGRAPHIC PRINTING STATION
K005 (PC 2) 6-COLOR FLEXOGRAPHIC PRINTING PRESS	K012 (COMCO 1) 9-COLOR NARROW FLEXOGRAPHIC PRINTING PRESS	K017 (COMCO 2) 9-COLOR NARROW FLEXOGRAPHIC PRINTING PRESS
K006 (PC 3/LAM 2) 6-COLOR FLEXOGRAPHIC PRINTING PRESS/ IN LINE ADHESIVE LAMINATOR	K013 (W & H 4) 6-COLOR FLEXOGRAPHIC PRINTING PRESS	K018 (COMCO 3) 9-COLOR NARROW FLEXOGRAPHIC PRINTING PRESS
K008 (W & H 2) 6-COLOR FLEXOGRAPHIC PRINTING PRESS/OUTBOARD ROTOGRAVURE STATION	K014 (PC 4) 6-COLOR FLEXOGRAPHIC PRINTING PRESS	
K010 (W & H 3) 6-COLOR FLEXOGRAPHIC PRINTING	K015 (W & H SOLO) 6-COLOR FLEXOGRAPHIC PRINTING PRESS- MEDIUM WIDTH	

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

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

Akron Air Pollution Control
146 South High Street, Room 904
Akron, OH 44308
(330) 375-2480

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. These quarterly written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations except malfunctions, which shall be reported in accordance with OAC rule 3745-15-06. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.) See B.8 below if no deviations occurred during the quarter.
 - iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to

the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, recordkeeping, and reporting requirements. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

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

2. Scheduled Maintenance/Malfunction Reporting

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

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

3. Risk Management Plans

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

4. Title IV Provisions

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

5. Severability Clause

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

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. Fees

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

8. Marketable Permit Programs

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

9. Reasonably Anticipated Operating Scenarios

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

10. Reopening for Cause

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

- a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b. This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c. The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d. The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

11. Federal and State Enforceability

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

12. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

- ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the appropriate Ohio EPA District Office or local air agency in the following manner and with the following content:
- i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
 - ii. Compliance certifications shall include the following:
 - (a) An identification of each term or condition of this permit that is the basis of the certification.
 - (b) The permittee's current compliance status.
 - (c) Whether compliance was continuous or intermittent.
 - (d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.
 - (e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
 - iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

13. Permit Shield

- a. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but

excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

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

14. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

15. Emergencies

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

16. Off Permit Changes

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

- a. The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition;
- b. The permittee provides contemporaneous written notice of the change to the director and the administrator, except that no such notice shall be required for changes that qualify as insignificant emission levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or

pollutants emitted, and any federally applicable requirement that would apply as a result of the change;

- c. The change shall not qualify for the permit shield under OAC rule 3745-77-07(F);
- d. The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes; and
- e. The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

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

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

17. Compliance Method Requirements

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

18. Insignificant Activity

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

B. State Only Enforceable Section

1. Permit to Install Requirement

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

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

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

this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

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

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

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforcable Section

1. JPS Packaging requested to restrict the emissions of any individual Hazardous Air Pollutant (HAP) to 9.9 tons per rolling, 12-month period, the emissions of total combined HAPs to 24.9 tons per rolling, 12-month period, and the emissions of volatile organic compound (VOC) to 249.9 tons per rolling, 12-month period. The company proposed these emission limitations to avoid PSD permitting and the Printing and Publishing MACT, 40 CFR Part 63, Subpart KK. JPS Packaging, has accepted these emission limitations as facility-wide caps for HAP and VOC emissions from emissions units K003, K005, K006, K008, K010, K012, K013, K014, K015, K016, K017, K018, T001, T002, and T003.
2. Compliance with the annual emission limitations for VOC, individual HAP, and total combined HAPs shall be based upon a rolling, 12-month summation of the monthly emissions.
3. In order to determine compliance with the facility-wide emission limitations, the permittee shall maintain monthly records of the following information for emissions units K003, K005, K006, K008, K010, K012, K013, K014, K015, K016, K017, K018, T001, T002, and T003:
 - 3.a For emissions units without control equipment (K012, K017, and K018):
 - i. the name and identification of each coating;
 - ii. the VOC content of each coating, in weight percent;
 - iii. the individual HAP content for each HAP of each coating, in weight percent;
 - iv. the total combined HAPs content of each coating, in weight percent (sum all the individual HAP contents from section 3.a.iii);
 - v. the total pounds of each coating employed;
 - vi. the name and identification of each solvent* employed;
 - vii. the VOC content of each solvent, in weight percent;
 - viii. the individual HAP content for each HAP of each solvent, in weight percent;
 - ix. the total combined HAPs content of each solvent, in weight percent (sum all the individual HAP contents from section 3.a.viii);
 - x. the total pounds of each solvent employed;
 - xi. the total uncontrolled individual HAP emissions for each HAP for all coatings and solvents employed, in tons per month (for each HAP, the sum of section 3.a.iii divided by 100 times section 3.a.v for each coating plus the sum of section 3.a.viii divided by 100 times section 3.a.x for each solvent, divided by 2000);
 - xii. the uncontrolled total combined HAPs emissions for all coatings and solvents employed, in tons per month (the sum of section 3.a.iv divided by 100 times section 3.a.v for each coating plus the sum of section 3.a.ix divided by 100 times section 3.a.x for each solvent, divided by 2000); and
 - xiii. the total uncontrolled VOC emissions for all coatings and solvents employed, in tons per month (the sum of section 3.a.ii divided by 100 times section 3.a.v for each coating plus the sum of section 3.a.vii divided by 100 times section 3.a.x for each solvent, divided by 2000).

*Solvent is defined as cleanup material and coating thinning material.

A. State and Federally Enforcable Section (continued)

- 3.b** For emissions units with control equipment (K003, K005, K006, K008, K010, K013, K014, K015, and K016):
- i. the name and identification of each coating;
 - ii. the VOC content of each coating in weight percent;
 - iii. the individual HAP content for each HAP of each coating, in weight percent;
 - iv. the total combined HAPs content of each coating, in weight percent (sum all the individual HAP contents from section 3.b.iii);
 - v. the total pounds of each coating employed;
 - vi. the name and identification of each solvent* employed;
 - vii. the VOC content of each solvent, in weight percent;
 - viii. the individual HAP content for each HAP of each solvent, in weight percent;
 - ix. the total combined HAPs content of each solvent, in weight percent (sum all the individual HAP contents from section 3.b.viii);
 - x. the total pounds of each solvent employed;
 - xi. the total uncontrolled individual HAP emissions for each HAP for all the coatings and solvents employed, in tons per month (for each HAP, the sum of section 3.b.iii divided by 100 times section 3.b.v for each coating plus the sum of section 3.b.viii divided by 100 times section 3.b.x for each solvent, divided by 2000);
 - xii. the uncontrolled total combined HAPs emissions for all the coatings and solvents employed, in tons per month (the sum of section 3.b.iv divided by 100 times section 3.b.v for each coating plus the sum of section 3.b.ix divided by 100 times section 3.b.x for each solvent, divided by 2000);
 - xiii. the total uncontrolled VOC accounted for in all coatings and solvents employed, in tons per month (the sum of section 3.b.ii divided by 100 times section 3.b.v for each coating plus the sum of section 3.b.vii divided by 100 times section 3.b.x for each solvent, divided by 2000);
 - xiv. the total number of coating waste drums;
 - xv. the total amount of VOC accounted for in the coating waste drums, in tons per month;
 - xvi. the total uncontrolled VOC emissions, in tons per month (section 3.b.xiii minus section 3.b.xv);
 - xvii. the linear feet of material produced by each emissions unit;
 - xviii. the total linear feet of material produced by all of emissions units that employ control equipment;

A. State and Federally Enforcable Section (continued)

xix. if the uncontrolled individual HAP emission rate for any HAP is calculated to be greater than 9.9 tons per rolling, 12-month period, then the permittee shall calculate the total uncontrolled individual HAP emissions for each HAP for each emissions unit, in tons per month (for each emissions unit section 3.b.xvii divided by section 3.b.xviii and then multiplied by section 3.b.xi);

xx. if the uncontrolled total combined HAPs emission rate is calculated to be greater than 24.9 tons per rolling, 12-month period, then the permittee shall calculate the uncontrolled total combined HAPs emissions for each emissions unit, in tons per month (for each emissions unit section 3.b.xvii divided by section 3.b.xviii and then multiplied by section 3.b.xii);

xxi. the total VOC emissions for each emissions unit, in tons per month (for each emissions unit section 3.b.xvii divided by section 3.b.xviii and then multiplied by section 3.b.xvi);

xxii. if the uncontrolled individual HAP emission rate for any HAP is calculated to be greater than 9.9 tons per rolling, 12-month period, then the permittee shall calculate for each emissions unit the controlled individual HAP emission rate for all coatings and solvents, in pounds or tons (the controlled emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance);

xxiii. if the uncontrolled total combined HAPs emission rate is calculated to be greater than 24.9 tons per rolling, 12-month period, then the permittee shall calculate for each emissions unit the controlled total combined HAPs emission rate for all coatings and solvents, in pounds or tons (the controlled emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance);

xxiv. for each emissions unit, the calculated, controlled VOC emission rate for all coatings and solvents, in pounds or tons (the controlled emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance);

xxv. if the uncontrolled individual HAP emission rate for any HAP is calculated to be greater than 9.9 tons per rolling, 12-month period, then the permittee shall calculate the total controlled individual HAP emission rate for all the emissions units (sum all the calculated, controlled individual HAP emission rate for each emissions unit from section 3.b.xxii);

xxvi. if the uncontrolled total combined HAPs emission rate is calculated to be greater than 24.9 tons per rolling, 12-month period, then the permittee shall calculate the controlled total combined HAPs emission rate for all the emissions units (sum all the calculated, controlled total combined HAPs emission rate for each emissions unit from section 3.b.xxiii); and

xxvii. the total calculated, controlled VOC emission rate for all the emissions units (sum all the calculated, controlled VOC emission rate for each emissions unit from section 3.b.xxiv).

*Solvent is defined as cleanup material and coating thinning material.

A. State and Federally Enforcable Section (continued)

3.c For total facility emissions:

- i. the total uncontrolled individual HAP emissions for each HAP for the entire facility, in tons per month (section 3.a.xi plus section 3.b.xi);
- ii. the total uncontrolled combined HAPs emissions for the entire facility, in tons per month (section 3.a.xii plus section 3.a.xii);
- iii. if the uncontrolled individual HAP emission rate for any HAP is calculated to be greater than 9.9 tons per rolling, 12-month period, then the permittee shall calculate the total individual HAP emissions for the entire facility, in tons per month (section 3.a.xi plus section 3.b.xxv);
- iv. if the uncontrolled total combined HAPs emission rate is calculated to be greater than 24.9 tons per rolling, 12-month period, then the permittee shall calculate the total combined HAPs emissions for the entire facility, in tons per month (section 3.a.xii plus section 3.b.xxvi);
- v. the total VOC emissions for the entire facility, in tons per month (section 3.a.xiii plus section 3.b.xxvii plus 3.0 tons per year* divided by 12);
- vi. the permittee shall record the rolling, 12-month summation of the monthly uncontrolled emissions of each individual HAP for the entire facility for each calendar month;
- vii. the permittee shall record the rolling, 12-month summation of the monthly uncontrolled emissions of total combined HAPs for the entire facility for each calendar month;
- viii. the permittee shall record the rolling, 12-month summation of the monthly emissions of VOC for the entire facility for each calendar month;
- ix. if the uncontrolled individual HAP emission rate for any HAP is calculated to be greater than 9.9 tons per rolling, 12-month period, then the permittee shall record the rolling, 12-month summation of the monthly controlled emissions of each individual HAP for the entire facility for each calendar month; and
- x. if the uncontrolled total combined HAPs emission rate is calculated to be greater than 24.9 tons per rolling, 12-month period, then the permittee shall record the rolling, 12-month summation of the monthly controlled emissions of total combined HAPs for the entire facility for each calendar month.

* The potential to emit for VOC for the three storage tanks (emissions units T001, T002, and T003) is 3.0 tons per year. The storage tanks do not store any HAPs.

4. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitations for VOC, individual HAP, and total combined HAPs. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii.
5. The permittee shall submit annual reports that specify the following information:
 - a. for the entire facility, the rolling, 12-month summations of monthly emissions of VOC, individual HAP, and total combined HAPs for each month during the calendar year (January through December); and
 - b. for each emissions unit, the VOC emission rate, in tons per year.

The annual reports shall be submitted by January 31 of each year, and shall cover the records for the previous calendar year (January through December). This reporting requirement may be satisfied by including and identifying the specific emission data (VOC, individual HAPs, and combined HAPs) for each emissions unit in the facility's annual Fee Emission Report.

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

A. State and Federally Enforceable Section (continued)

- 6.a** Emission Limitations:
9.9 tons of HAP per rolling, 12-month period
24.9 tons of HAPs per rolling, 12-month period
249.9 tons of VOC per rolling, 12-month period

Applicable Compliance Method:

Compliance with these emission limitations shall be demonstrated through the records required pursuant to sections A.3, A.3.a, A.3.b, and A.3.c of these terms and conditions.

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 section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

Formulation data shall be used to determine the HAP contents of the coatings and solvents.

B. State Only Enforceable Section

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

T001 - above ground storage tank;
T002 - above ground storage tank; and
T003 - above ground storage tank.

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: W & H I (K003)

Activity Description: 6- COLOR FLEXOGRAPHIC PRINTING PRESS/OUTBOARD ROTOGRAVURE STATION

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
6-color flexographic printing press/outboard rotogravure station - W & H I controlled with thermal incinerator #1, thermal incinerator #2, or catalytic incinerator #2	OAC rule 3745-31-05(A)(3) (PTI 16-222)	The requirements established pursuant to this rule are equivalent to the requirements of OAC rule 3745-21-09(Y).
	OAC rule 3745-21-09(Y)	See A.I.2.a below.

2. Additional Terms and Conditions

- 2.a The printing line shall be equipped with a capture system and associated control system which are designed and operated to achieve the following efficiencies for volatile organic compounds (VOC):
 - i. a capture efficiency which is at least 65 percent, by weight, for a flexographic printing line; and
 - ii. a control efficiency which is at least 90 percent, by weight.

II. Operational Restrictions

1. The emissions from this emissions unit shall be vented to either thermal incinerator #1, thermal incinerator #2, or catalytic incinerator #2 when the emissions unit is in operation.
2. When thermal incinerator #1 is in use, the average combustion temperature within thermal incinerator, for any 3-hour block of time, shall not be less than 1300 degrees Fahrenheit or shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance.
3. When thermal incinerator #2 is in use, the average combustion temperature within thermal incinerator, for any 3-hour block of time, shall not be less than 1300 degrees Fahrenheit or shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance.
4. When catalytic incinerator #2 is in use, (a) the average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 650 degrees Fahrenheit or shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance, and (b) the average temperature difference across the catalyst bed, for any 3-hour block of time when the emissions unit is operating at maximum conditions, shall not be less than 80 degrees Fahrenheit or shall not be less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain records documenting any time periods when the emissions unit was in operation and the emissions from the emissions unit were not vented to either thermal incinerator #1, thermal incinerator #2, or catalytic incinerator #2.
2. When thermal incinerator #1 is in use, the permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
3. When thermal incinerator #2 is in use, the permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
4. When catalytic incinerator #2 is in use, the permittee shall operate and maintain continuous temperature monitors and recorder(s) which measure and record(s) the temperature immediately upstream and downstream of the incinerator's catalyst bed when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorder(s) shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
5. The permittee shall collect and record the following information for each day when thermal incinerator #1 is in use:
 - a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator was less than 1300 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance; and
 - b. a log of the downtime for the capture (collection) system, thermal incinerator, and monitoring equipment, when this emissions unit was in operation.
6. The permittee shall collect and record the following information for each day when thermal incinerator #2 is in use:
 - a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator was less than 1300 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance; and
 - b. a log of the downtime for the capture (collection) system, thermal incinerator, and monitoring equipment, when this emissions unit was in operation.
7. The permittee shall collect and record the following information for each day when catalytic incinerator #2 is in use:
 - a. all 3-hour blocks of time during which the average temperature of the exhaust gases immediately before the catalyst bed was less than 650 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance;
 - b. all 3-hour blocks of time (when the emissions unit(s) was (were) operating at maximum conditions) during which the average temperature difference across the catalyst bed was less than 80 degrees Fahrenheit or less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance; and
 - c. a log of the downtime for the capture (collection) system, catalytic incinerator, and monitoring equipment, when this emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify any time periods when the emissions unit was in operation and the emissions from the emissions unit were not vented to either thermal incinerator #1, thermal incinerator #2, or catalytic incinerator #2. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall submit quarterly summaries of the following records:
 - a. all 3-hour blocks of time during which the average combustion temperature within thermal incinerator #1 was less than 1300 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance;
 - b. all 3-hour blocks of time during which the average combustion temperature within thermal incinerator #2 was less than 1300 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance;
 - c. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was less than 650 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance;
 - d. all 3-hour blocks of time (when the emissions unit(s) was (were) operating at maximum condition) during which the average temperature difference across the catalyst bed was less than 80 degrees Fahrenheit or less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance; and
 - e. a log of the downtime for the capture (collection) system, control devices, and monitoring equipment, when this emissions unit was in operation.

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

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 6 months prior to permit expiration.
 - b. The emission testing shall be conducted to demonstrate compliance with the 65 percent capture and 90 percent control efficiency limitations for VOC.
 - c. The test method(s) which must be employed to demonstrate compliance with the capture and control efficiency limitations for VOC are specified below. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
 - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
 - e. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)
 - f. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

V. Testing Requirements (continued)

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<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: PC 2 (K005)

Activity Description: 6-COLOR FLEXOGRAPHIC PRINTING PRESS

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
6-color flexographic printing press - PC 2 - controlled with thermal incinerator #1, thermal incinerator #2, or catalytic incinerator #2	OAC rule 3745-21-09(Y)	See A.I.2.a below.

2. Additional Terms and Conditions

- 2.a The printing line shall be equipped with a capture system and associated control system which are designed and operated to achieve the following efficiencies for volatile organic compounds (VOC):
 - i. a capture efficiency which is at least 65 percent, by weight, for a flexographic printing line; and
 - ii. a control efficiency which is at least 90 percent, by weight.

II. Operational Restrictions

1. The emissions from this emissions unit shall be vented to either thermal incinerator #1, thermal incinerator #2, or catalytic incinerator #2 when the emissions unit is in operation.
2. When thermal incinerator #1 is in use, the average combustion temperature within thermal incinerator, for any 3-hour block of time, shall not be less than 1300 degrees Fahrenheit or shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance.
3. When thermal incinerator #2 is in use, the average combustion temperature within thermal incinerator, for any 3-hour block of time, shall not be less than 1300 degrees Fahrenheit or shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance.
4. When catalytic incinerator #2 is in use, (a) the average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 650 degrees Fahrenheit or shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance, and (b) the average temperature difference across the catalyst bed, for any 3-hour block of time when the emissions unit is operating at maximum conditions, shall not be less than 80 degrees Fahrenheit or shall not be less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain records documenting any time periods when the emissions unit was in operation and the emissions from the emissions unit were not vented to either thermal incinerator #1, thermal incinerator #2, or catalytic incinerator #2.
2. When thermal incinerator #1 is in use, the permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
3. When thermal incinerator #2 is in use, the permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
4. When catalytic incinerator #2 is in use, the permittee shall operate and maintain continuous temperature monitors and recorder(s) which measure and record(s) the temperature immediately upstream and downstream of the incinerator's catalyst bed when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorder(s) shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
5. The permittee shall collect and record the following information for each day when thermal incinerator #1 is in use:
 - a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator was less than 1300 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance; and
 - b. a log of the downtime for the capture (collection) system, thermal incinerator, and monitoring equipment, when this emissions unit was in operation.
6. The permittee shall collect and record the following information for each day when thermal incinerator #2 is in use:
 - a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator was less than 1300 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance; and
 - b. a log of the downtime for the capture (collection) system, thermal incinerator, and monitoring equipment, when this emissions unit was in operation.
7. The permittee shall collect and record the following information for each day when catalytic incinerator #2 is in use:
 - a. all 3-hour blocks of time during which the average temperature of the exhaust gases immediately before the catalyst bed was less than 650 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance;
 - b. all 3-hour blocks of time (when the emissions unit(s) was (were) operating at maximum conditions) during which the average temperature difference across the catalyst bed was less than 80 degrees Fahrenheit or less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance; and
 - c. a log of the downtime for the capture (collection) system, catalytic incinerator, and monitoring equipment, when this emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify any time periods when the emissions unit was in operation and the emissions from the emissions unit were not vented to either thermal incinerator #1, thermal incinerator #2, or catalytic incinerator #2. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall submit quarterly summaries of the following records:
 - a. all 3-hour blocks of time during which the average combustion temperature within thermal incinerator #1 was less than 1300 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance;
 - b. all 3-hour blocks of time during which the average combustion temperature within thermal incinerator #2 was less than 1300 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance;
 - c. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was less than 650 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance;
 - d. all 3-hour blocks of time (when the emissions unit(s) was (were) operating at maximum condition) during which the average temperature difference across the catalyst bed was less than 80 degrees Fahrenheit or less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance; and
 - e. a log of the downtime for the capture (collection) system, control devices, and monitoring equipment, when this emissions unit was in operation.

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

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 6 months prior to permit expiration.
 - b. The emission testing shall be conducted to demonstrate compliance with the 65 percent capture and 90 percent control efficiency limitations for VOC.
 - c. The test method(s) which must be employed to demonstrate compliance with the capture and control efficiency limitations for VOC are specified below. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
 - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
 - e. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)
 - f. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

V. Testing Requirements (continued)

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<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: PC 3/LAM 2 (K006)

Activity Description: 6-COLOR FLEXOGRAPHIC PRINTING PRESS/ IN LINE ADHESIVE LAMINATOR

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
6-color flexographic printing press - PC 3 - controlled with thermal incinerator #1, thermal incinerator #2, or catalytic incinerator #2 and an in-line adhesive laminator - LAM 2 - controlled with thermal incinerator #1, thermal incinerator #2, or catalytic incinerator #2	OAC rule 3745-31-05(A)(3) (PTI 16-068)	The requirements established pursuant to this rule are equivalent to the requirements of OAC rule 3745-21-09(Y).
	OAC rule 3745-21-09(Y)	See A.I.2.a below.

2. Additional Terms and Conditions

- 2.a The printing line shall be equipped with a capture system and associated control system which are designed and operated to achieve the following efficiencies for volatile organic compounds (VOC):
 - i. a capture efficiency which is at least 65 percent, by weight, for a flexographic printing line; and
 - ii. a control efficiency which is at least 90 percent, by weight.

II. Operational Restrictions

1. The emissions from this emissions unit shall be vented to either thermal incinerator #1, thermal incinerator #2, or catalytic incinerator #2 when the emissions unit is in operation.
2. When thermal incinerator #1 is in use, the average combustion temperature within thermal incinerator, for any 3-hour block of time, shall not be less than 1300 degrees Fahrenheit or shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance.
3. When thermal incinerator #2 is in use, the average combustion temperature within thermal incinerator, for any 3-hour block of time, shall not be less than 1300 degrees Fahrenheit or shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance.

II. Operational Restrictions (continued)

4. When catalytic incinerator #2 is in use, (a) the average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 650 degrees Fahrenheit or shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance, and (b) the average temperature difference across the catalyst bed, for any 3-hour block of time when the emissions unit is operating at maximum conditions, shall not be less than 80 degrees Fahrenheit or shall not be less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain records documenting any time periods when the emissions unit was in operation and the emissions from the emissions unit were not vented to either thermal incinerator #1, thermal incinerator #2, or catalytic incinerator #2.
2. When thermal incinerator #1 is in use, the permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
3. When thermal incinerator #2 is in use, the permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
4. When catalytic incinerator #2 is in use, the permittee shall operate and maintain continuous temperature monitors and recorder(s) which measure and record(s) the temperature immediately upstream and downstream of the incinerator's catalyst bed when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorder(s) shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
5. The permittee shall collect and record the following information for each day when thermal incinerator #1 is in use:
 - a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator was less than 1300 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance; and
 - b. a log of the downtime for the capture (collection) system, thermal incinerator, and monitoring equipment, when this emissions unit was in operation.
6. The permittee shall collect and record the following information for each day when thermal incinerator #2 is in use:
 - a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator was less than 1300 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance; and
 - b. a log of the downtime for the capture (collection) system, thermal incinerator, and monitoring equipment, when this emissions unit was in operation.

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

7. The permittee shall collect and record the following information for each day when catalytic incinerator #2 is in use:
 - a. all 3-hour blocks of time during which the average temperature of the exhaust gases immediately before the catalyst bed was less than 650 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance;
 - b. all 3-hour blocks of time (when the emissions unit(s) was (were) operating at maximum conditions) during which the average temperature difference across the catalyst bed was less than 80 degrees Fahrenheit or less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance; and
 - c. a log of the downtime for the capture (collection) system, catalytic incinerator, and monitoring equipment, when this emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify any time periods when the emissions unit was in operation and the emissions from the emissions unit were not vented to either thermal incinerator #1, thermal incinerator #2, or catalytic incinerator #2. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall submit quarterly summaries of the following records:
 - a. all 3-hour blocks of time during which the average combustion temperature within thermal incinerator #1 was less than 1300 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance;
 - b. all 3-hour blocks of time during which the average combustion temperature within thermal incinerator #2 was less than 1300 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance;
 - c. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was less than 650 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance;
 - d. all 3-hour blocks of time (when the emissions unit(s) was (were) operating at maximum condition) during which the average temperature difference across the catalyst bed was less than 80 degrees Fahrenheit or less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance; and
 - e. a log of the downtime for the capture (collection) system, control devices, and monitoring equipment, when this emissions unit was in operation.

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

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 6 months prior to permit expiration.
 - b. The emission testing shall be conducted to demonstrate compliance with the 65 percent capture and 90 percent control efficiency limitations for VOC.
 - c. The test method(s) which must be employed to demonstrate compliance with the capture and control efficiency limitations for VOC are specified below. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
 - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
 - e. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)
 - f. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
3. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
4. A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<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: W & H 2 (K008)

Activity Description: 6-COLOR FLEXOGRAPHIC PRINTING PRESS/OUTBOARD ROTOGRAVURE STATION

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
6-color flexographic printing press with outboard rotogravure coater - W & H 2 - controlled with thermal incinerator #1, thermal incinerator #2, or catalytic incinerator #2	OAC rule 3745-31-05(A)(3) (PTI 16-02024)	49.0 lbs/hr of volatile organic compounds (VOC)
	OAC rule 3745-21-09(Y)	25.0 tpy of VOC
		See A.I.2.a below.
		See A.I.2.b below.

2. Additional Terms and Conditions

- 2.a The printing line shall be equipped with a capture system and associated control system which are designed and operated to achieve a control efficiency which is at least 90 percent, by weight, and an overall control efficiency which is at least 70 percent, by weight, for VOC.
- 2.b The emission control requirements based on this applicable rule are less stringent than the emission control requirements established pursuant to OAC rule 3745-31-05(A)(3).

II. Operational Restrictions

1. The emissions from this emissions unit shall be vented to either thermal incinerator #1, thermal incinerator #2, or catalytic incinerator #2 when the emissions unit is in operation.
2. When thermal incinerator #1 is in use, the average combustion temperature within thermal incinerator, for any 3-hour block of time, shall not be less than 1300 degrees Fahrenheit or shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance.
3. When thermal incinerator #2 is in use, the average combustion temperature within thermal incinerator, for any 3-hour block of time, shall not be less than 1300 degrees Fahrenheit or shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance.
4. When catalytic incinerator #2 is in use, (a) the average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 650 degrees Fahrenheit or shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance, and (b) the average temperature difference across the catalyst bed, for any 3-hour block of time when the emissions unit is operating at maximum conditions, shall not be less than 80 degrees Fahrenheit or shall not be less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain records documenting any time periods when the emissions unit was in operation and the emissions from the emissions unit were not vented to either thermal incinerator #1, thermal incinerator #2, or catalytic incinerator #2.
2. When thermal incinerator #1 is in use, the permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
3. When thermal incinerator #2 is in use, the permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
4. When catalytic incinerator #2 is in use, the permittee shall operate and maintain continuous temperature monitors and recorder(s) which measure and record(s) the temperature immediately upstream and downstream of the incinerator's catalyst bed when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorder(s) shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
5. The permittee shall collect and record the following information for each day when thermal incinerator #1 is in use:
 - a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator was less than 1300 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance; and
 - b. a log of the downtime for the capture (collection) system, thermal incinerator, and monitoring equipment, when this emissions unit was in operation.
6. The permittee shall collect and record the following information for each day when thermal incinerator #2 is in use:
 - a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator was less than 1300 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance; and
 - b. a log of the downtime for the capture (collection) system, thermal incinerator, and monitoring equipment, when this emissions unit was in operation.
7. The permittee shall collect and record the following information for each day when catalytic incinerator #2 is in use:
 - a. all 3-hour blocks of time during which the average temperature of the exhaust gases immediately before the catalyst bed was less than 650 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance;
 - b. all 3-hour blocks of time (when the emissions unit(s) was (were) operating at maximum conditions) during which the average temperature difference across the catalyst bed was less than 80 degrees Fahrenheit or less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance; and
 - c. a log of the downtime for the capture (collection) system, catalytic incinerator, and monitoring equipment, when this emissions unit was in operation.

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

8. The permittee shall collect and record the following information for each month for this emissions unit:
 - a. the total number of hours this emissions unit was in operation; and
 - b. the average, controlled VOC emission rate for this emissions unit, in pounds per hour (A.3.b.xxiv of Part II - Specific Facility Terms and Conditions divided by A.III.8.a).

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify any time periods when the emissions unit was in operation and the emissions from the emissions unit were not vented to either thermal incinerator #1, thermal incinerator #2, or catalytic incinerator #2. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall submit quarterly summaries of the following records:
 - a. all 3-hour blocks of time during which the average combustion temperature within thermal incinerator #1 was less than 1300 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance;
 - b. all 3-hour blocks of time during which the average combustion temperature within thermal incinerator #2 was less than 1300 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance;
 - c. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was less than 650 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance;
 - d. all 3-hour blocks of time (when the emissions unit(s) was (were) operating at maximum condition) during which the average temperature difference across the catalyst bed was less than 80 degrees Fahrenheit or less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance; and
 - e. a log of the downtime for the capture (collection) system, control devices, and monitoring equipment, when this emissions unit was in operation.

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

3. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each month during which the VOC emissions exceeded 49.0 lbs/hr, and the actual average hourly VOC emissions for each such month.

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

4. 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 January 31 of each year.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 6 months prior to permit expiration.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate(s) for VOC (49.0 lbs/hr) and the overall control efficiency limitations for VOC (90% control and 70% overall).
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): For VOC Methods 1-4 and 25 of 40 CFR Part 60, Appendix A. The test method(s) which must be employed to demonstrate compliance with the overall efficiency limitations for VOC are specified below. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
 - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
 - e. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)
 - f. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
3. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
4. A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.
5. Emission Limitation:
49.0 lbs/hr of VOC

Applicable Compliance Method:

Compliance with this emission limitation may be determined based upon the records required pursuant to section A.3.b of Part II - Specific Facility Terms and Conditions and section A.III.8 of the Terms and Conditions for this emissions unit. Compliance with this emission limitation shall be determined based upon the emission testing requirements specified in section A.V.1 of the Terms and Conditions for this emissions unit.

Facility Name: **JPS Packaging**

Facility ID: **16-77-00-0105**

Emissions Unit: **W & H 2 (K008)**

V. Testing Requirements (continued)

6. Emission Limitation:
25.0 tpy of VOC

Applicable Compliance Method:

Compliance with this emission limitation may be determined based upon the records required pursuant to Part II - Specific Facility Terms and Conditions section A.3.b of this permit.

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>
6-color flexographic printing press with outboard rotogravure coater - W & H 2 - controlled with thermal incinerator #1, thermal incinerator #2, or catalytic incinerator #2		See B.III.1 below.

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 (K008) 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 ISC 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the ISC 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):

Pollutant: ethyl alcohol

TLV (mg/m³): 1880

Maximum Hourly Emission Rate (lbs/hr): 128.2*

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 7455.72

MAGLC (ug/m³): 44761.9

Pollutant: ethyl acetate

TLV (mg/m³): 1440

Maximum Hourly Emission Rate (lbs/hr): 128.2*

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 7455.72

MAGLC (ug/m³): 34285.7

Pollutant: isopropyl alcohol

TLV (mg/m³): 983

Maximum Hourly Emission Rate (lbs/hr): 128.2*

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 7455.72

MAGLC (ug/m³): 23404.8

Pollutant: n-propyl acetate

TLV (mg/m³): 835

Maximum Hourly Emission Rate (lbs/hr): 128.2*

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 7455.72

MAGLC (ug/m³): 19881.0

Pollutant: methyl ethyl ketone

TLV (mg/m³): 590

Maximum Hourly Emission Rate (lbs/hr): 128.2*

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 7455.72

MAGLC (ug/m³): 14047.6

Pollutant: n-propyl alcohol

TLV (mg/m³): 492

Maximum Hourly Emission Rate (lbs/hr): 128.2*

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 7455.72

MAGLC (ug/m³): 11714.3

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

*The maximum hourly emission rate is the summation of the allowable mass emissions for K013 through K019 plus the 3.0 lbs/hr increase in the allowable for K008.

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.

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: W & H 3 (K010)

Activity Description: 6-COLOR FLEXOGRAPHIC PRINTING PRESS/OUTBOARD LAMINATION AND BACKSIDE PRINTING STATION

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
6-color flexographic printing press with outboard laminator and backside printing - W & H 3 -controlled with thermal incinerator #1, thermal incinerator #2, or catalytic incinerator #2	OAC rule 3745-31-05 (PTI 16-01928 and 16-02024)	25.0 lbs/hr volatile organic compounds (VOC) 109 tpy VOC See A.I.2.a below.
	OAC rule 3745-21-09(Y)	The emission limitations specified by this rule are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a The printing line shall be equipped with a capture system and associated control system which are designed and operated to achieve the following efficiencies for volatile organic compounds (VOC):
 - i. an overall control efficiency which is at least 70 percent, by weight; and
 - ii. a control efficiency which is at least 90 percent, by weight.

II. Operational Restrictions

1. The emissions from this emissions unit shall be vented to either thermal incinerator #1, thermal incinerator #2, or catalytic incinerator #2 when the emissions unit is in operation.
2. When thermal incinerator #1 is in use, the average combustion temperature within thermal incinerator, for any 3-hour block of time, shall not be less than 1300 degrees Fahrenheit or shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance.
3. When thermal incinerator #2 is in use, the average combustion temperature within thermal incinerator, for any 3-hour block of time, shall not be less than 1300 degrees Fahrenheit or shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance.

II. Operational Restrictions (continued)

4. When catalytic incinerator #2 is in use, (a) the average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 650 degrees Fahrenheit or shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance, and (b) the average temperature difference across the catalyst bed, for any 3-hour block of time when the emissions unit is operating at maximum conditions, shall not be less than 80 degrees Fahrenheit or shall not be less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain records documenting any time periods when the emissions unit was in operation and the emissions from the emissions unit were not vented to either thermal incinerator #1, thermal incinerator #2, or catalytic incinerator #2.
2. When thermal incinerator #1 is in use, the permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
3. When thermal incinerator #2 is in use, the permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
4. When catalytic incinerator #2 is in use, the permittee shall operate and maintain continuous temperature monitors and recorder(s) which measure and record(s) the temperature immediately upstream and downstream of the incinerator's catalyst bed when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorder(s) shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
5. The permittee shall collect and record the following information for each day when thermal incinerator #1 is in use:
 - a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator was less than 1300 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance; and
 - b. a log of the downtime for the capture (collection) system, thermal incinerator, and monitoring equipment, when this emissions unit was in operation.
6. The permittee shall collect and record the following information for each day when thermal incinerator #2 is in use:
 - a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator was less than 1300 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance; and
 - b. a log of the downtime for the capture (collection) system, thermal incinerator, and monitoring equipment, when this emissions unit was in operation.

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

7. The permittee shall collect and record the following information for each day when catalytic incinerator #2 is in use:
 - a. all 3-hour blocks of time during which the average temperature of the exhaust gases immediately before the catalyst bed was less than 650 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance;
 - b. all 3-hour blocks of time (when the emissions unit(s) was (were) operating at maximum conditions) during which the average temperature difference across the catalyst bed was less than 80 degrees Fahrenheit or less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance; and
 - c. a log of the downtime for the capture (collection) system, catalytic incinerator, and monitoring equipment, when this emissions unit was in operation.
8. The permittee shall collect and record the following information for each month for the emissions unit:
 - a. the total number of hours this emissions unit was in operation; and
 - b. the average, controlled VOC emission rate for this emissions unit, in pounds per hour (A.3.b.xxiv of Part II - Specific Facility Terms and Conditions divided by A.III.8.a).

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify any time periods when the emissions unit was in operation and the emissions from the emissions unit were not vented to either thermal incinerator #1, thermal incinerator #2, or catalytic incinerator #2. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall submit quarterly summaries of the following records:
 - a. all 3-hour blocks of time during which the average combustion temperature within thermal incinerator #1 was less than 1300 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance;
 - b. all 3-hour blocks of time during which the average combustion temperature within thermal incinerator #2 was less than 1300 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance;
 - c. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was less than 650 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance;
 - d. all 3-hour blocks of time (when the emissions unit(s) was (were) operating at maximum condition) during which the average temperature difference across the catalyst bed was less than 80 degrees Fahrenheit or less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance; and
 - e. a log of the downtime for the capture (collection) system, control devices, and monitoring equipment, when this emissions unit was in operation.

These quarterly summaries shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.
3. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each period during which the average hourly VOC emissions exceeded 25.0 pounds per hour, and the actual average hourly VOC emissions for each such period.

IV. Reporting Requirements (continued)

4. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c of this permit.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 6 months prior to permit expiration.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate(s) for VOC (25.0 lbs/hr) and the overall control efficiency limitations for VOC (90% control and 70% overall).
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): For VOC Methods 1-4 and 25 of 40 CFR Part 60, Appendix A. The test method(s) which must be employed to demonstrate compliance with the overall efficiency limitations for VOC are specified below. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
 - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
 - e. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)
 - f. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
3. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
4. A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.
5. Emission Limitation:
25.0 lbs/hr VOC

Applicable Compliance Method:

Compliance with this emission limitation may be determined based upon the records required pursuant to section A.3.b of Part II - Specific Facility Terms and Conditions and section A.III.8 of the Terms and Conditions for this emissions unit. Compliance with this emission limitation shall be determined based upon the emission testing requirements specified in section A.V.1 of the Terms and Conditions for this emissions unit.

V. Testing Requirements (continued)

6. Emission Limitation:
109 tpy VOC

Applicable Compliance Method:

Compliance with this emission limitation may be determined based upon the records required pursuant to Part II - Specific Facility Terms and Conditions section A.3.b of this permit.

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>
6-color flexographic printing press with outboard laminator and backside printing - W & H 3 -controlled with thermal incinerator #1, thermal incinerator #2, or catalytic incinerator #2		See B.III.1 below.

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):

Pollutant: n-propyl alcohol

TLV (mg/m3): 492

Maximum Hourly Emission Rate (lbs/hr): 25.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 437.2

MAGLC (ug/m3): 11,714

Pollutant: n-propyl acetate

TLV (mg/m3): 835

Maximum Hourly Emission Rate (lbs/hr): 25.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 437.2

MAGLC (ug/m3): 19,881

Pollutant: ethyl acetate

TLV (mg/m3): 1,440

Maximum Hourly Emission Rate (lbs/hr): 25.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 437.2

MAGLC (ug/m3): 34,286

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

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.

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: COMCO 1 (K012)

Activity Description: 9-COLOR NARROW FLEXOGRAPHIC PRINTING PRESS

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>
9-color flexographic printing press - COMCO 1	OAC rule 3745-31-05 (PTI 16-1575)	0.7 lb/hr of volatile organic compounds (VOC)
	OAC rule 3745-21-09(Y)	See A.I.2.a below.

2. Additional Terms and Conditions

- 2.a The volatile organic compound content of the coatings and inks shall not exceed the following limitations:
 - a. 40 percent VOC, by volume, of the coating or ink, excluding water and exempt solvents; or
 - b. 25 percent VOC, by volume, of the volatile matter in the coating or ink.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for the line:
 - a. the name and identification number of each coating and ink, as applied; and
 - b. the VOC content in percentage VOC by volume of each coating and ink (excluding water and exempt solvents); or
 - c. the VOC content in percentage VOC by volume of the volatile matter in each coating and ink.

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

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

2. The permittee shall maintain monthly records of the following information:
 - a. the linear feet of material produced by this emissions unit;
 - b. the total linear feet of material produced by all of the emissions units that do not employ control equipment;
 - c. the total number of hours this emissions unit was in operation;
 - d. the average, uncontrolled VOC emission rate for this emissions unit, in pounds per month (A.III.2.a divided by A.III.2.b, and then multiplied by A.3.a.xiii of Part II - Specific Facility Terms and Conditions); and
 - e. the average, uncontrolled VOC emission rate for this emissions unit, in pounds per hour (A.III.2.d divided by A.III.2.c).

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 (for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each month during which the VOC emissions exceeded 0.7 lb/hr, and the actual average hourly VOC emissions for each such month.
3. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii of this permit.

V. Testing Requirements

1. Compliance with the emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

- 1.a Emission Limitation:
40 percent VOC, by volume, of the coating and ink, excluding water or 25 percent VOC, by volume, of the volatile matter in the coating and ink

Applicable Compliance Method:

OAC rule 3745-21-10(B). 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 section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

- 1.b Emission Limitation:
0.7 lb/hr of VOC

Applicable Compliance Method:

Compliance may be demonstrated using the record keeping as required by section A.III.2 of these terms and conditions or, if required, compliance shall be demonstrated through emission testing pursuant to OAC rule 3745-21-10(C).

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: W & H 4 (K013)
Activity Description: 6-COLOR FLEXOGRAPHIC PRINTING PRESS

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
6-color flexographic printing press - W & H 4 - controlled with thermal incinerator #1, thermal incinerator #2, or catalytic incinerator #2	OAC rule 3745-31-05 (PTI 16-02024)	30.0 lbs/hr of volatile organic compounds (VOC)
		25.0 tpy of VOC See A.I.2.a below.
	OAC rule 3745-21-09(Y)	See A.I.2.b below.

2. Additional Terms and Conditions

- 2.a The printing line shall be equipped with a capture system and associated control system which are designed and operated to achieve a control efficiency which is at least 90 percent, by weight, and an overall control efficiency which is at least 70 percent by weight, for VOC.
- 2.b The emission control requirements based on this applicable rule are less stringent than the emission control requirements established pursuant to OAC rule 3745-31-05.

II. Operational Restrictions

1. The emissions from this emissions unit shall be vented to either thermal incinerator #1, thermal incinerator #2, or catalytic incinerator #2 when the emissions unit is in operation.
2. When thermal incinerator #1 is in use, the average combustion temperature within thermal incinerator, for any 3-hour block of time, shall not be less than 1300 degrees Fahrenheit or shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance.
3. When thermal incinerator #2 is in use, the average combustion temperature within thermal incinerator, for any 3-hour block of time, shall not be less than 1300 degrees Fahrenheit or shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance.

II. Operational Restrictions (continued)

4. When catalytic incinerator #2 is in use, (a) the average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 650 degrees Fahrenheit or shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance, and (b) the average temperature difference across the catalyst bed, for any 3-hour block of time when the emissions unit is operating at maximum conditions, shall not be less than 80 degrees Fahrenheit or shall not be less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain records documenting any time periods when the emissions unit was in operation and the emissions from the emissions unit were not vented to either thermal incinerator #1, thermal incinerator #2, or catalytic incinerator #2.
2. When thermal incinerator #1 is in use, the permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
3. When thermal incinerator #2 is in use, the permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
4. When catalytic incinerator #2 is in use, the permittee shall operate and maintain continuous temperature monitors and recorder(s) which measure and record(s) the temperature immediately upstream and downstream of the incinerator's catalyst bed when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorder(s) shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
5. The permittee shall collect and record the following information for each day when thermal incinerator #1 is in use:
 - a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator was less than 1300 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance; and
 - b. a log of the downtime for the capture (collection) system, thermal incinerator, and monitoring equipment, when this emissions unit was in operation.
6. The permittee shall collect and record the following information for each day when thermal incinerator #2 is in use:
 - a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator was less than 1300 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance; and
 - b. a log of the downtime for the capture (collection) system, thermal incinerator, and monitoring equipment, when this emissions unit was in operation.

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

7. The permittee shall collect and record the following information for each day when catalytic incinerator #2 is in use:
 - a. all 3-hour blocks of time during which the average temperature of the exhaust gases immediately before the catalyst bed was less than 650 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance;
 - b. all 3-hour blocks of time (when the emissions unit(s) was (were) operating at maximum conditions) during which the average temperature difference across the catalyst bed was less than 80 degrees Fahrenheit or less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance; and
 - c. a log of the downtime for the capture (collection) system, catalytic incinerator, and monitoring equipment, when this emissions unit was in operation.
8. The permittee shall collect and record the following information for each month for the emissions unit:
 - a. the total number of hours this emissions unit was in operation; and
 - b. the average, controlled VOC emission rate for this emissions unit, in pounds per hour (A.3.b.xxiv of Part II - Specific Facility Terms and Conditions divided by A.III.8.a).

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify any time periods when the emissions unit was in operation and the emissions from the emissions unit were not vented to either thermal incinerator #1, thermal incinerator #2, or catalytic incinerator #2. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall submit quarterly summaries of the following records:
 - a. all 3-hour blocks of time during which the average combustion temperature within thermal incinerator #1 was less than 1300 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance;
 - b. all 3-hour blocks of time during which the average combustion temperature within thermal incinerator #2 was less than 1300 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance;
 - c. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was less than 650 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance;
 - d. all 3-hour blocks of time (when the emissions unit(s) was (were) operating at maximum condition) during which the average temperature difference across the catalyst bed was less than 80 degrees Fahrenheit or less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance; and
 - e. a log of the downtime for the capture (collection) system, control devices, and monitoring equipment, when this emissions unit was in operation.

These quarterly summaries shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.
3. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each month during which the VOC emissions exceeded 30.0 lbs/hr, and the actual average hourly VOC emissions for each such month.

IV. Reporting Requirements (continued)

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

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 6 months prior to permit expiration.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate(s) for VOC (30.0 lbs/hr) and the overall control efficiency limitations for VOC (90% control and 70% overall).
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): For VOC Methods 1-4 and 25 of 40 CFR Part 60, Appendix A. The test method(s) which must be employed to demonstrate compliance with the overall efficiency limitations for VOC are specified below. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
 - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
 - e. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)
 - f. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
3. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
4. A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.
5. Emission Limitation:
30.0 lbs/hr of VOC

Applicable Compliance Method:

Compliance with this emission limitation may be determined based upon the records required pursuant to section A.3.b of Part II - Specific Facility Terms and Conditions and section A.III.8 of the Terms and Conditions for this emissions unit. Compliance with this emission limitation shall be determined based upon the emission testing requirements specified in section A.V.1 of the Terms and Conditions for this emissions unit.

V. Testing Requirements (continued)

6. Emission Limitation:
25.0 tpy of VOC

Applicable Compliance Method:

Compliance with this emission limitation may be determined based upon the records required pursuant to Part II - Specific Facility Terms and Conditions section A.3.b of this permit.

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>
6-color flexographic printing press - W & H 4 - controlled with thermal incinerator #1, thermal incinerator #2, or catalytic incinerator #2		See B.III.1below.

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

Pollutant: ethyl alcohol

TLV (mg/m3): 1880
Maximum Hourly Emission Rate (lbs/hr): 128.2*
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 7455.72
MAGLC (ug/m3): 44761.9

Pollutant: ethyl acetate

TLV (mg/m3): 1440
Maximum Hourly Emission Rate (lbs/hr): 128.2*
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 7455.72
MAGLC (ug/m3): 34285.7

Pollutant: isopropyl alcohol

TLV (mg/m3): 983
Maximum Hourly Emission Rate (lbs/hr): 128.2*
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 7455.72
MAGLC (ug/m3): 23404.8

Pollutant: n-propyl acetate

TLV (mg/m3): 835
Maximum Hourly Emission Rate (lbs/hr): 128.2*
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 7455.72
MAGLC (ug/m3): 19881.0

Pollutant: methyl ethyl ketone

TLV (mg/m3): 590
Maximum Hourly Emission Rate (lbs/hr): 128.2*
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 7455.72
MAGLC (ug/m3): 14047.6

Pollutant: n-propyl alcohol

TLV (mg/m3): 492
Maximum Hourly Emission Rate (lbs/hr): 128.2*
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 7455.72
MAGLC (ug/m3): 11714.3

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

*The maximum hourly emission rate is the summation of the allowable mass emissions for K013 through K019 plus the 3.0 lbs/hr increase in the allowable for K008.

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.

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: PC 4 (K014)

Activity Description: 6-COLOR FLEXOGRAPHIC PRINTING PRESS

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
6-color flexographic printing press - PC 4 - controlled with thermal incinerator #1, thermal incinerator #2, or catalytic incinerator #2	OAC rule 3745-31-05 (PTI 16-02024)	46.0 lbs/hr of volatile organic compounds (VOC) 25.0 tpy of VOC See A.I.2.a below.
	OAC rule 3745-21-09(Y)	See A.I.2.b below.

2. Additional Terms and Conditions

- 2.a The printing line shall be equipped with a capture system and associated control system which are designed and operated to achieve a control efficiency which is at least 90 percent, by weight, and an overall control efficiency which is at least 70 percent, by weight.
- 2.b The emission control requirements based on this applicable rule are less stringent than the emission control requirements established pursuant to OAC rule 3745-31-05.

II. Operational Restrictions

1. The emissions from this emissions unit shall be vented to either thermal incinerator #1, thermal incinerator #2, or catalytic incinerator #2 when the emissions unit is in operation.
2. When thermal incinerator #1 is in use, the average combustion temperature within thermal incinerator, for any 3-hour block of time, shall not be less than 1300 degrees Fahrenheit or shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance.
3. When thermal incinerator #2 is in use, the average combustion temperature within thermal incinerator, for any 3-hour block of time, shall not be less than 1300 degrees Fahrenheit or shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance.

II. Operational Restrictions (continued)

4. When catalytic incinerator #2 is in use, (a) the average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 650 degrees Fahrenheit or shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance, and (b) the average temperature difference across the catalyst bed, for any 3-hour block of time when the emissions unit is operating at maximum conditions, shall not be less than 80 degrees Fahrenheit or shall not be less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain records documenting any time periods when the emissions unit was in operation and the emissions from the emissions unit were not vented to either thermal incinerator #1, thermal incinerator #2, or catalytic incinerator #2.
2. When thermal incinerator #1 is in use, the permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
3. When thermal incinerator #2 is in use, the permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
4. When catalytic incinerator #2 is in use, the permittee shall operate and maintain continuous temperature monitors and recorder(s) which measure and record(s) the temperature immediately upstream and downstream of the incinerator's catalyst bed when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorder(s) shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
5. The permittee shall collect and record the following information for each day when thermal incinerator #1 is in use:
 - a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator was less than 1300 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance; and
 - b. a log of the downtime for the capture (collection) system, thermal incinerator, and monitoring equipment, when this emissions unit was in operation.
6. The permittee shall collect and record the following information for each day when thermal incinerator #2 is in use:
 - a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator was less than 1300 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance; and
 - b. a log of the downtime for the capture (collection) system, thermal incinerator, and monitoring equipment, when this emissions unit was in operation.

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

7. The permittee shall collect and record the following information for each day when catalytic incinerator #2 is in use:
 - a. all 3-hour blocks of time during which the average temperature of the exhaust gases immediately before the catalyst bed was less than 650 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance;
 - b. all 3-hour blocks of time (when the emissions unit(s) was (were) operating at maximum conditions) during which the average temperature difference across the catalyst bed was less than 80 degrees Fahrenheit or less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance; and
 - c. a log of the downtime for the capture (collection) system, catalytic incinerator, and monitoring equipment, when this emissions unit was in operation.
8. The permittee shall collect and record the following information for each month for the emissions unit:
 - a. the total number of hours this emissions unit was in operation; and
 - b. the average, controlled VOC emission rate for this emissions unit, in pounds per hour (A.3.b.xxiv of Part II - Specific Facility Terms and Conditions divided by A.III.8.a).

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify any time periods when the emissions unit was in operation and the emissions from the emissions unit were not vented to either thermal incinerator #1, thermal incinerator #2, or catalytic incinerator #2. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall submit quarterly summaries of the following records:
 - a. all 3-hour blocks of time during which the average combustion temperature within thermal incinerator #1 was less than 1300 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance;
 - b. all 3-hour blocks of time during which the average combustion temperature within thermal incinerator #2 was less than 1300 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance;
 - c. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was less than 650 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance;
 - d. all 3-hour blocks of time (when the emissions unit(s) was (were) operating at maximum condition) during which the average temperature difference across the catalyst bed was less than 80 degrees Fahrenheit or less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance; and
 - e. a log of the downtime for the capture (collection) system, control devices, and monitoring equipment, when this emissions unit was in operation.

These quarterly summaries shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.
3. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each month during which the VOC emissions exceeded 46.0 lbs/hr, and the actual average hourly VOC emissions for each such month.

IV. Reporting Requirements (continued)

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

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 6 months prior to permit expiration.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate(s) for VOC (46.0 lbs/hr) and the overall control efficiency limitations for VOC (90% control and 70% overall).
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): For VOC Methods 1-4 and 25 of 40 CFR Part 60, Appendix A. The test method(s) which must be employed to demonstrate compliance with the overall efficiency limitations for VOC are specified below. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
 - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
 - e. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)
 - f. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
3. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
4. A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.
5. Emission Limitation:
46.0 lbs/hr of VOC

Applicable Compliance Method:

Compliance with this emission limitation may be determined based upon the records required pursuant to section A.3.b of Part II - Specific Facility Terms and Conditions and section A.III.8 of the Terms and Conditions for this emissions unit. Compliance with this emission limitation shall be determined based upon the emission testing requirements specified in section A.V.1 of the Terms and Conditions for this emissions unit.

Facility Name: **JPS Packaging**

Facility ID: **16-77-00-0105**

Emissions Unit: **PC 4 (K014)**

V. Testing Requirements (continued)

6. Emission Limitation:
25.0 tpy of VOC

Applicable Compliance Method:

Compliance with this emission limitation may be determined based upon the records required pursuant to Part II - Specific Facility Terms and Conditions section A.3.b of this permit.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

**Operations, Property,
and/or Equipment**

**Applicable Rules/
Requirements**

**Applicable Emissions
Limitations/Control
Measures**

6-color flexographic printing press -
PC 4 - controlled with thermal
incinerator #1, thermal incinerator
#2, or catalytic incinerator #2

See B.III.1 below.

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 (K014) 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 ISC 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the ISC 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):

Pollutant: ethyl alcohol

TLV (mg/m³): 1880

Maximum Hourly Emission Rate (lbs/hr): 128.2*

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 7455.72

MAGLC (ug/m³): 44761.9

Pollutant: ethyl acetate

TLV (mg/m³): 1440

Maximum Hourly Emission Rate (lbs/hr): 128.2*

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 7455.72

MAGLC (ug/m³): 34285.7

Pollutant: isopropyl alcohol

TLV (mg/m³): 983

Maximum Hourly Emission Rate (lbs/hr): 128.2*

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 7455.72

MAGLC (ug/m³): 23404.8

Pollutant: n-propyl acetate

TLV (mg/m³): 835

Maximum Hourly Emission Rate (lbs/hr): 128.2*

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 7455.72

MAGLC (ug/m³): 19881.0

Pollutant: methyl ethyl ketone

TLV (mg/m³): 590

Maximum Hourly Emission Rate (lbs/hr): 128.2*

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 7455.72

MAGLC (ug/m³): 14047.6

Pollutant: n-propyl alcohol

TLV (mg/m³): 492

Maximum Hourly Emission Rate (lbs/hr): 128.2*

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 7455.72

MAGLC (ug/m³): 11714.3

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

*The maximum hourly emission rate is the summation of the allowable mass emissions for K013 through K019 plus the 3.0 lbs/hr increase in the allowable for K008.

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.

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: W & H SOLO (K015)

Activity Description: 6-COLOR FLEXOGRAPHIC PRINTING PRESS- MEDIUM WIDTH

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
6-color flexographic printing press - W & H SOLO - controlled with thermal incinerator #1, thermal incinerator #2, or catalytic incinerator #2	OAC rule 3745-31-05 (PTI 16-02024)	15.0 lbs/hr of volatile organic compounds (VOC)
		10.0 tpy of VOC
		See A.I.2.a below.
	OAC rule 3745-21-09(Y)	See A.I.2.b below.

2. Additional Terms and Conditions

- 2.a The printing line shall be equipped with a capture system and associated control system which are designed and operated to achieve a control efficiency which is at least 90 percent, by weight, and an overall control efficiency which is at least 70 percent, by weight.
- 2.b The emission control requirements based on this applicable rule are less stringent than the emission control requirements established pursuant to OAC rule 3745-31-05.

II. Operational Restrictions

1. The emissions from this emissions unit shall be vented to either thermal incinerator #1, thermal incinerator #2, or catalytic incinerator #2 when the emissions unit is in operation.
2. When thermal incinerator #1 is in use, the average combustion temperature within thermal incinerator, for any 3-hour block of time, shall not be less than 1300 degrees Fahrenheit or shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance.
3. When thermal incinerator #2 is in use, the average combustion temperature within thermal incinerator, for any 3-hour block of time, shall not be less than 1300 degrees Fahrenheit or shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance.

II. Operational Restrictions (continued)

4. When catalytic incinerator #2 is in use, (a) the average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 650 degrees Fahrenheit or shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance, and (b) the average temperature difference across the catalyst bed, for any 3-hour block of time when the emissions unit is operating at maximum conditions, shall not be less than 80 degrees Fahrenheit or shall not be less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain records documenting any time periods when the emissions unit was in operation and the emissions from the emissions unit were not vented to either thermal incinerator #1, thermal incinerator #2, or catalytic incinerator #2.
2. When thermal incinerator #1 is in use, the permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
3. When thermal incinerator #2 is in use, the permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
4. When catalytic incinerator #2 is in use, the permittee shall operate and maintain continuous temperature monitors and recorder(s) which measure and record(s) the temperature immediately upstream and downstream of the incinerator's catalyst bed when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorder(s) shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
5. The permittee shall collect and record the following information for each day when thermal incinerator #1 is in use:
 - a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator was less than 1300 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance; and
 - b. a log of the downtime for the capture (collection) system, thermal incinerator, and monitoring equipment, when this emissions unit was in operation.
6. The permittee shall collect and record the following information for each day when thermal incinerator #2 is in use:
 - a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator was less than 1300 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance; and
 - b. a log of the downtime for the capture (collection) system, thermal incinerator, and monitoring equipment, when this emissions unit was in operation.

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

7. The permittee shall collect and record the following information for each day when catalytic incinerator #2 is in use:
 - a. all 3-hour blocks of time during which the average temperature of the exhaust gases immediately before the catalyst bed was less than 650 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance;
 - b. all 3-hour blocks of time (when the emissions unit(s) was (were) operating at maximum conditions) during which the average temperature difference across the catalyst bed was less than 80 degrees Fahrenheit or less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance; and
 - c. a log of the downtime for the capture (collection) system, catalytic incinerator, and monitoring equipment, when this emissions unit was in operation.
8. The permittee shall collect and record the following information for each month for the emissions unit:
 - a. the total number of hours this emissions unit was in operation; and
 - b. the average, controlled VOC emission rate for this emissions unit, in pounds per hour (A.3.b.xxiv of Part II - Specific Facility Terms and Conditions divided by A.III.8.a).

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify any time periods when the emissions unit was in operation and the emissions from the emissions unit were not vented to either thermal incinerator #1, thermal incinerator #2, or catalytic incinerator #2. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall submit quarterly summaries of the following records:
 - a. all 3-hour blocks of time during which the average combustion temperature within thermal incinerator #1 was less than 1300 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance;
 - b. all 3-hour blocks of time during which the average combustion temperature within thermal incinerator #2 was less than 1300 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance;
 - c. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was less than 650 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance;
 - d. all 3-hour blocks of time (when the emissions unit(s) was (were) operating at maximum condition) during which the average temperature difference across the catalyst bed was less than 80 degrees Fahrenheit or less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance; and
 - e. a log of the downtime for the capture (collection) system, control devices, and monitoring equipment, when this emissions unit was in operation.

These quarterly summaries shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.
3. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each month during which the VOC emissions exceeded 15.0 lbs/hr, and the actual average hourly VOC emissions for each such month.

IV. Reporting Requirements (continued)

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

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 6 months prior to permit expiration.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate(s) for VOC (15.0 lbs/hr) and the overall control efficiency limitations for VOC (90% control and 70% overall).
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): For VOC Methods 1-4 and 25 of 40 CFR Part 60, Appendix A. The test method(s) which must be employed to demonstrate compliance with the overall efficiency limitations for VOC are specified below. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
 - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
 - e. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)
 - f. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
3. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
4. A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.
5. Emission Limitation:
15.0 lbs/hr of VOC

Applicable Compliance Method:

Compliance with this emission limitation may be determined based upon the records required pursuant to section A.3.b of Part II - Specific Facility Terms and Conditions and section A.III.8 of the Terms and Conditions for this emissions unit. Compliance with this emission limitation shall be determined based upon the emission testing requirements specified in section A.V.1 of the Terms and Conditions for this emissions unit.

V. Testing Requirements (continued)

6. Emission Limitation:
10.0 tpy of VOC

Applicable Compliance Method:

Compliance with this emission limitation may be determined based upon the records required pursuant to Part II - Specific Facility Terms and Conditions section A.3.b of this permit.

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>
6-color flexographic printing press - W & H SOLO - controlled with thermal incinerator #1, thermal incinerator #2, or catalytic incinerator #2		See B.III.1 below.

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 (K015) 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 ISC 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the ISC 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):

Pollutant: ethyl alcohol

TLV (mg/m3): 1880
Maximum Hourly Emission Rate (lbs/hr): 128.2*
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 7455.72
MAGLC (ug/m3): 44761.9

Pollutant: ethyl acetate

TLV (mg/m3): 1440
Maximum Hourly Emission Rate (lbs/hr): 128.2*
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 7455.72
MAGLC (ug/m3): 34285.7

Pollutant: isopropyl alcohol

TLV (mg/m3): 983
Maximum Hourly Emission Rate (lbs/hr): 128.2*
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 7455.72
MAGLC (ug/m3): 23404.8

Pollutant: n-propyl acetate

TLV (mg/m3): 835
Maximum Hourly Emission Rate (lbs/hr): 128.2*
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 7455.72
MAGLC (ug/m3): 19881.0

Pollutant: methyl ethyl ketone

TLV (mg/m3): 590
Maximum Hourly Emission Rate (lbs/hr): 128.2*
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 7455.72
MAGLC (ug/m3): 14047.6

Pollutant: n-propyl alcohol

TLV (mg/m3): 492
Maximum Hourly Emission Rate (lbs/hr): 128.2*
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 7455.72
MAGLC (ug/m3): 11714.3

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

*The maximum hourly emission rate is the summation of the allowable mass emissions for K013 through K019 plus the 3.0 lbs/hr increase in the allowable for K008.

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.

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: PC VISION (K016)
Activity Description: 8-COLOR FLEXOGRAPHIC PRINTING PRESS - MEDIUM WIDTH/ OUTBOARD FLEXOGRAPHIC PRINTING STATION

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
8-color flexographic printing press with outboard flexographic coater - PC VISION - controlled with thermal incinerator #1, thermal incinerator #2, or catalytic incinerator #2	OAC rule 3745-31-05 (PTI 16-02024)	30.0 lbs/hr of volatile organic compounds (VOC)
		25.0 tpy of VOC
		See A.I.2.a below.
	OAC rule 3745-21-09(Y)	See A.I.2.b below.

2. Additional Terms and Conditions

- 2.a The printing line shall be equipped with a capture system and associated control system which are designed and operated to achieve a control efficiency which is at least 90 percent, by weight, and an overall control efficiency which is at least 70 percent, by weight, for VOC.
- 2.b The emission control requirements based on this applicable rule are less stringent than the emission control requirements established pursuant to OAC rule 3745-31-05.

II. Operational Restrictions

1. The emissions from this emissions unit shall be vented to either thermal incinerator #1, thermal incinerator #2, or catalytic incinerator #2 when the emissions unit is in operation.
2. When thermal incinerator #1 is in use, the average combustion temperature within thermal incinerator, for any 3-hour block of time, shall not be less than 1300 degrees Fahrenheit or shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance.
3. When thermal incinerator #2 is in use, the average combustion temperature within thermal incinerator, for any 3-hour block of time, shall not be less than 1300 degrees Fahrenheit or shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance.

II. Operational Restrictions (continued)

4. When catalytic incinerator #2 is in use, (a) the average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 650 degrees Fahrenheit or shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance, and (b) the average temperature difference across the catalyst bed, for any 3-hour block of time when the emissions unit is operating at maximum conditions, shall not be less than 80 degrees Fahrenheit or shall not be less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain records documenting any time periods when the emissions unit was in operation and the emissions from the emissions unit were not vented to either thermal incinerator #1, thermal incinerator #2, or catalytic incinerator #2.
2. When thermal incinerator #1 is in use, the permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
3. When thermal incinerator #2 is in use, the permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
4. When catalytic incinerator #2 is in use, the permittee shall operate and maintain continuous temperature monitors and recorder(s) which measure and record(s) the temperature immediately upstream and downstream of the incinerator's catalyst bed when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorder(s) shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
5. The permittee shall collect and record the following information for each day when thermal incinerator #1 is in use:
 - a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator was less than 1300 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance; and
 - b. a log of the downtime for the capture (collection) system, thermal incinerator, and monitoring equipment, when this emissions unit was in operation.
6. The permittee shall collect and record the following information for each day when thermal incinerator #2 is in use:
 - a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator was less than 1300 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance; and
 - b. a log of the downtime for the capture (collection) system, thermal incinerator, and monitoring equipment, when this emissions unit was in operation.

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

7. The permittee shall collect and record the following information for each day when catalytic incinerator #2 is in use:
 - a. all 3-hour blocks of time during which the average temperature of the exhaust gases immediately before the catalyst bed was less than 650 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance;
 - b. all 3-hour blocks of time (when the emissions unit(s) was (were) operating at maximum conditions) during which the average temperature difference across the catalyst bed was less than 80 degrees Fahrenheit or less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance; and
 - c. a log of the downtime for the capture (collection) system, catalytic incinerator, and monitoring equipment, when this emissions unit was in operation.
8. The permittee shall collect and record the following information for each month for the emissions unit:
 - a. the total number of hours this emissions unit was in operation; and
 - b. the average, controlled VOC emission rate for this emissions unit, in pounds per hour (A.3.b.xxiv of Part II - Specific Facility Terms and Conditions divided by A.III.8.a).

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify any time periods when the emissions unit was in operation and the emissions from the emissions unit were not vented to either thermal incinerator #1, thermal incinerator #2, or catalytic incinerator #2. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall submit quarterly summaries of the following records:
 - a. all 3-hour blocks of time during which the average combustion temperature within thermal incinerator #1 was less than 1300 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance;
 - b. all 3-hour blocks of time during which the average combustion temperature within thermal incinerator #2 was less than 1300 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance;
 - c. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was less than 650 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance;
 - d. all 3-hour blocks of time (when the emissions unit(s) was (were) operating at maximum condition) during which the average temperature difference across the catalyst bed was less than 80 degrees Fahrenheit or less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance; and
 - e. a log of the downtime for the capture (collection) system, control devices, and monitoring equipment, when this emissions unit was in operation.

These quarterly summaries shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.
3. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each month during which the VOC emissions exceeded 30.0 lbs/hr, and the actual average hourly VOC emissions for each such month.

IV. Reporting Requirements (continued)

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

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 6 months prior to permit expiration.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate(s) for VOC (30.0 lbs/hr) and the overall control efficiency limitations for VOC (90% control and 70% overall).
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): For VOC Methods 1-4 and 25 of 40 CFR Part 60, Appendix A. The test method(s) which must be employed to demonstrate compliance with the overall efficiency limitations for VOC are specified below. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
 - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
 - e. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)
 - f. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
3. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
4. A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.
5. Emission Limitation:
30.0 lbs/hr of VOC

Applicable Compliance Method:

Compliance with this emission limitation may be determined based upon the records required pursuant to section A.3.b of Part II - Specific Facility Terms and Conditions and section A.III.8 of the Terms and Conditions for this emissions unit. Compliance with this emission limitation shall be determined based upon the emission testing requirements specified in section A.V.1 of the Terms and Conditions for this emissions unit.

V. Testing Requirements (continued)

6. Emission Limitation:
25.0 tpy of VOC

Applicable Compliance Method

Compliance with this emission limitation may be determined based upon the records required pursuant to Part II - Specific Facility Terms and Conditions section A.3.b of this permit.

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>
8-color flexographic printing press with outboard flexographic coater - PC VISION - controlled with thermal incinerator #1, thermal incinerator #2, or catalytic incinerator #2		See B.III.1 below.

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 (K016) 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 ISC 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the ISC 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):

Pollutant: ethyl alcohol

TLV (mg/m3): 1880
Maximum Hourly Emission Rate (lbs/hr): 128.2*
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 7455.72
MAGLC (ug/m3): 44761.9

Pollutant: ethyl acetate

TLV (mg/m3): 1440
Maximum Hourly Emission Rate (lbs/hr): 128.2*
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 7455.72
MAGLC (ug/m3): 34285.7

Pollutant: isopropyl alcohol

TLV (mg/m3): 983
Maximum Hourly Emission Rate (lbs/hr): 128.2*
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 7455.72
MAGLC (ug/m3): 23404.8

Pollutant: n-propyl acetate

TLV (mg/m3): 835
Maximum Hourly Emission Rate (lbs/hr): 128.2*
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 7455.72
MAGLC (ug/m3): 19881.0

Pollutant: methyl ethyl ketone

TLV (mg/m3): 590
Maximum Hourly Emission Rate (lbs/hr): 128.2*
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 7455.72
MAGLC (ug/m3): 14047.6

Pollutant: n-propyl alcohol

TLV (mg/m3): 492
Maximum Hourly Emission Rate (lbs/hr): 128.2*
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 7455.72
MAGLC (ug/m3): 11714.3

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

*The maximum hourly emission rate is the summation of the allowable mass emissions for K013 through K019 plus the 3.0 lbs/hr increase in the allowable for K008.

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.

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: COMCO 2 (K017)

Activity Description: 9-COLOR NARROW FLEXOGRAPHIC PRINTING PRESS

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>
9-color narrow flexographic printing press - COMCO 2	OAC rule 3745-31-05 (PTI 16-02024)	1.4 lbs/hr of volatile organic compounds (VOC) 1.0 tpy of VOC
	OAC rule 3745-21-09(Y)	See A.I.2.a below.

2. Additional Terms and Conditions

- 2.a The volatile organic compound content of the coatings and inks shall not exceed the following limitations:
 - a. 40 percent VOC, by volume, of the coating or ink, excluding water and exempt solvents; or
 - b. 25 percent VOC, by volume, of the volatile matter in the coating or ink.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for the line:
 - a. the name and identification number of each coating and ink, as applied; and
 - b. the VOC content in percentage VOC by volume of each coating and ink (excluding water and exempt solvents); or
 - c. the VOC content in percentage VOC by volume of the volatile matter in each coating and ink.

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

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

2. The permittee shall maintain monthly records of the following information:
 - a. the linear feet of material produced by this emissions unit;
 - b. the total linear feet of material produced by all of the emissions units that do not employ control equipment;
 - c. the total number of hours this emissions unit was in operation;
 - d. the average, uncontrolled VOC emission rate for this emissions unit, in pounds per month (A.III.2.a divided by A.III.2.b and then multiplied by A.3.a.xiii of Part II - Specific Facility Terms and Conditions); and
 - e. the average, uncontrolled VOC emission rate for this emissions unit, in pounds per hour (A.III.2.d divided by A.III.2.c).

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 (for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each month during which the VOC emissions exceeded 1.4 lbs/hr, and the actual average hourly VOC emissions for each such month.
3. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii of this permit.

V. Testing Requirements

1. Compliance with the emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:
 - 1.a Emission Limitation:
40 percent VOC by volume of the coating and ink, excluding water and exempt solvents or 25 percent VOC by volume of the volatile matter in the coating and ink

Applicable Compliance Method:
OAC rule 3745-21-10(B). 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 section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee 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.
 - 1.b Emission Limitation:
1.4 lbs/hr of VOC

Applicable Compliance Method:
Compliance may be demonstrated using the records required by section A.III.2 of these terms and conditions or, if required, compliance shall demonstrated through emission testing pursuant to OAC rule 3745-21-10(C).
 - 1.c Emission Limitation:
1.0 tpy of VOC

Applicable Compliance Method:
Compliance with this emission limitation may be demonstrated through the records required pursuant to Part II - Specific Facility Terms and Conditions section A.3.a of this permit.

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>
9-color narrow flexographic printing press - COMCO 2		See B.III.1 below.

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 (K017) 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 ISC 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the ISC 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):

Pollutant: ethyl alcohol

TLV (mg/m³): 1880
Maximum Hourly Emission Rate (lbs/hr): 128.2*
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 7455.72
MAGLC (ug/m³): 44761.9

Pollutant: ethyl acetate

TLV (mg/m³): 1440
Maximum Hourly Emission Rate (lbs/hr): 128.2*
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 7455.72
MAGLC (ug/m³): 34285.7

Pollutant: isopropyl alcohol

TLV (mg/m³): 983
Maximum Hourly Emission Rate (lbs/hr): 128.2*
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 7455.72
MAGLC (ug/m³): 23404.8

Pollutant: n-propyl acetate

TLV (mg/m³): 835
Maximum Hourly Emission Rate (lbs/hr): 128.2*
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 7455.72
MAGLC (ug/m³): 19881.0

Pollutant: methyl ethyl ketone

TLV (mg/m³): 590
Maximum Hourly Emission Rate (lbs/hr): 128.2*
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 7455.72
MAGLC (ug/m³): 14047.6

Pollutant: n-propyl alcohol

TLV (mg/m³): 492
Maximum Hourly Emission Rate (lbs/hr): 128.2*
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 7455.72
MAGLC (ug/m³): 11714.3

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

*The maximum hourly emission rate is the summation of the allowable mass emissions for K013 through K019 plus the 3.0 lbs/hr increase in the allowable for K008.

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.

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: COMCO 3 (K018)

Activity Description: 9-COLOR NARROW FLEXOGRAPHIC PRINTING PRESS

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>
9-color narrow flexographic printing press - COMCO 3	OAC rule 3745-31-05 (PTI 16-02024)	1.4 lbs/hr of volatile organic compounds (VOC) 1.0 tpy of VOC
	OAC rule 3745-21-09(Y)	See A.I.2.a below.

2. Additional Terms and Conditions

- 2.a The volatile organic compound content of the coatings and inks shall not exceed the following limitations:
 - a. 40 percent VOC, by volume, of the coating or ink, excluding water and exempt solvents; or
 - b. 25 percent VOC, by volume, of the volatile matter in the coating or ink.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for the line:
 - a. the name and identification number of each coating and ink, as applied; and
 - b. the VOC content in percentage VOC by volume of each coating and ink (excluding water and exempt solvents); or
 - c. the VOC content in percentage VOC by volume of the volatile matter in each coating and ink.

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

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

2. The permittee shall maintain monthly records of the following information:
 - a. the linear feet of material produced by this emissions unit;
 - b. the total linear feet of material produced by all of the emissions units that do not employ control equipment;
 - c. the total number of hours this emissions unit was in operation;
 - d. the average, uncontrolled VOC emission rate for this emissions unit, in pounds per month (A.III.2.a divided by A.III.2.b and then multiplied by A.3.a.xiii of Part II - Specific Facility Terms and Conditions); and
 - e. the average, uncontrolled VOC emission rate for this emissions unit, in pounds per hour (A.III.2.d divided by A.III.2.c).

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 (for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each month during which the VOC emissions exceeded 1.4 lbs/hr, and the actual average hourly VOC emissions for each such month.
3. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii of this permit.

V. Testing Requirements

1. Compliance with the emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:
 - 1.a Emission Limitation:
40 percent VOC by volume of the coating and ink, excluding water and exempt solvents or 25 percent VOC by volume of the volatile matter in the coating and ink

Applicable Compliance Method:
OAC rule 3745-21-10(B). 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 section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee 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.
 - 1.b Emission Limitation:
1.4 lbs/hr of VOC

Applicable Compliance Method:
Compliance may be demonstrated using the records required by section A.III.2 of these terms and conditions or, if required, compliance shall demonstrated through emission testing pursuant to OAC rule 3745-21-10(C).
 - 1.c Emission Limitation:
1.0 tpy of VOC

Applicable Compliance Method:
Compliance with this emission limitation may be demonstrated through the records required pursuant to Part II - Specific Facility Terms and Conditions section A.3.a of this permit.

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>
9-color narrow flexographic printing press - COMCO 3		See B.III.1 below.

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 (K018) 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 ISC 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the ISC 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):

Pollutant: ethyl alcohol

TLV (mg/m³): 1880
Maximum Hourly Emission Rate (lbs/hr): 128.2*
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 7455.72
MAGLC (ug/m³): 44761.9

Pollutant: ethyl acetate

TLV (mg/m³): 1440
Maximum Hourly Emission Rate (lbs/hr): 128.2*
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 7455.72
MAGLC (ug/m³): 34285.7

Pollutant: isopropyl alcohol

TLV (mg/m³): 983
Maximum Hourly Emission Rate (lbs/hr): 128.2*
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 7455.72
MAGLC (ug/m³): 23404.8

Pollutant: n-propyl acetate

TLV (mg/m³): 835
Maximum Hourly Emission Rate (lbs/hr): 128.2*
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 7455.72
MAGLC (ug/m³): 19881.0

Pollutant: methyl ethyl ketone

TLV (mg/m³): 590
Maximum Hourly Emission Rate (lbs/hr): 128.2*
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 7455.72
MAGLC (ug/m³): 14047.6

Pollutant: n-propyl alcohol

TLV (mg/m³): 492
Maximum Hourly Emission Rate (lbs/hr): 128.2*
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 7455.72
MAGLC (ug/m³): 11714.3

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

*The maximum hourly emission rate is the summation of the allowable mass emissions for K013 through K019 plus the 3.0 lbs/hr increase in the allowable for K008.

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.

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

Facility Name: **JPS Packaging**
Facility ID: **16-77-00-0105**

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