



Environmental Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

4/27/2011

DONALD PRATHER
CUSTOM POLY BAG COMPANY
9465 EDISON STREET NE
ALLIANCE, OH 44601

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1576011543
Permit Number: P0105584
Permit Type: Renewal
County: Stark

Certified Mail

| | |
|-----|------------------------------------|
| No | TOXIC REVIEW |
| No | PSD |
| No | SYNTHETIC MINOR TO AVOID MAJOR NSR |
| No | CEMS |
| Yes | MACT/GACT |
| No | NSPS |
| No | NESHAPS |
| No | NETTING |
| No | MAJOR NON-ATTAINMENT |
| No | MODELING SUBMITTED |
| Yes | SYNTHETIC MINOR TO AVOID TITLE V |
| Yes | FEDERALLY ENFORCABLE PTIO (FEPTIO) |

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, The Canton Repository. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

| | | |
|--|-----|---|
| Andrew Hall Permit Review/Development Section Ohio EPA, DAPC 122 South Front Street Columbus, Ohio 43215 | and | Canton City Health Department 420 Market Avenue Canton, OH 44702-1544 |
|--|-----|---|

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Canton City Health Department at (330)489-3385.

Sincerely,

Michael W. Ahern, Manager

Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 Via E-Mail Notification
Canton; Pennsylvania; West Virginia



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Custom Poly Bag Company is a manufacturer of custom plastic bags. The facility contains the following three flexographic printing presses:

| EU ID | Operations, Property and/or Equipment Description | PTI # |
|-------|---|----------|
| K001 | Hudson Sharp Flexographic Printing Press, Model #586 | 15-706 |
| K002 | Hudson Sharp Flexographic Printing Press, Model #A-9 | 15-531 |
| K003 | Infinity II Flexographic Printing Press, Model #1004377 | 15-01582 |

Custom Poly Bag Company submitted an application to revise their volatile organic compound (VOC) emissions limitations for increased material throughput with no physical change in, or change in the method of operation, of the equipment. Former EU ID numbers P002 and P003 were renumbered to K002 and K003, respectively, to align with the appropriate DAPC designation for coating/printing lines. A correction to the maximum throughput values for the presses resulted in a facility-wide uncontrolled potential to emit (PTE) which exceeds the 100 tons per year (tpy) VOC major source threshold. Therefore, federally enforceable restrictions on the hours of operation were established in order to avoid Title V status.

3. Facility Emissions and Attainment Status:

Emissions from the three printing lines consist of VOC in the applied inks/solvents and cleanup materials. Some of the inks contain a small amount of glycol ethers, which are classified as Hazardous Air Pollutants (HAP) and subject the area sources to 40 CFR Part 63, Subpart KK, National Emission Standards for the Printing and Publishing Industry. Custom Poly Bag Company is located in Stark County which is in attainment with all National Ambient Air Quality Standards (NAAQS), with the exception of particulate matter with an aerodynamic diameter of 2.5 microns or less (PM_{2.5}).

4. Source Emissions:

| EU ID | Material | VOC Content (lbs/gal) | Maximum Throughput (gal/hr) | VOC Emissions (lbs/hr) | Restricted Operating Hours | Synthetic Minor VOC PTE (tpy) |
|-------|----------|-----------------------|-----------------------------|------------------------|----------------------------|-------------------------------|
| K001 | Ink | 1.15 | 1.75 | 2.01 | 2080 | 2.09 |
| K001 | Solvent | 6.57 | 2.50 | 16.43 | 2080 | 17.08 |
| K002 | Ink | 1.15 | 1.00 | 1.15 | 2080 | 1.20 |
| K002 | Solvent | 6.57 | 1.00 | 6.57 | 2080 | 6.83 |
| K003 | Ink | 5.33 | 4.50 | 6.66* | 6240 | 20.77* |
| K003 | Solvent | 6.77 | 6.00 | 11.23* | 6240 | 35.14* |
| | | | | | Total | 83.11 |

* K003 Overall Control Efficiency = 85% Capture x 85% Control = 72.25%



Worst-Cast HAP:

| Ink | Density (lb/gal) | HAP (wt%) | HAP (lb/gal) | Maximum Throughput (gal/hr) | HAP Emissions (lb/hr) | Restricted Operating Hours | HAP Emissions (tpy) |
|-------------------|------------------|-----------|--------------|-----------------------------|-----------------------|----------------------------|---------------------|
| K001 Aquasurf Red | 9.05 | 3.13 | 0.2831 | 1.75 | 0.50 | 2080 | 0.52 |
| K002 Aquasurf Red | 9.05 | 3.13 | 0.2831 | 1.00 | 0.28 | 2080 | 0.29 |
| | | | | | Total | | 0.81 |

5. Conclusion:

Compliance with the rolling, 12-month VOC emissions limitations and operating hour restrictions, in addition to the associated recordkeeping and reporting requirements in this permit, will ensure that the facility remains a synthetic minor, through OAC rule 3745-31-05(D) with respect to VOC emissions, and avoids major stationary source Title V status. Issuance of FEPTIO P0105584 is recommended.

6. Please provide additional notes or comments as necessary:

Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions units' maximum annual emissions for each toxic compound (ammonia, glycol ethers) will be less than 1.0 ton per year.

This facility is transitioning from a Non-Title V to a Synthetic Minor Title V permitting classification.

7. Total Permit Allowable Emissions Summary (for informational purposes only):

| <u>Pollutant</u> | <u>Tons Per Year</u> |
|------------------|----------------------|
| VOC | 83.11 |

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install and Operate
CUSTOM POLY BAG COMPANY

Issue Date: 4/27/2011
Permit Number: P0105584
Permit Type: Renewal
Permit Description: Renewal permit with revised VOC emission limitations for three flexographic printing presses based on updated calculations. K003 is the only press with a control device (enclosed chamber). Annual operating hour restrictions were established to limit facility-wide VOC emissions below 100 tpy to avoid Title V. This is the first PTIO issued to the facility.
Facility ID: 1576011543
Facility Location: CUSTOM POLY BAG COMPANY
9465 EDISON STREET NE,
Alliance, OH 44601
Facility Description: All Other Plastics Product Manufacturing

Scott J. Nally, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio has issued a draft action of an air pollution control, federally enforceable permit-to-install and operate (PTIO) for the facility at the location identified above on the date indicated. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Kelly Kanoza at Canton City Health Department, 420 Market Avenue, Canton, OH 44702-1544 or (330)489-3385 . The permit can be downloaded from the Web page: www.epa.ohio.gov/dapc

Ohio

**Environmental
Protection Agency**

DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
CUSTOM POLY BAG COMPANY**

| | |
|----------------|-----------------------------------|
| Facility ID: | 1576011543 |
| Permit Number: | P0105584 |
| Permit Type: | Renewal |
| Issued: | 4/27/2011 |
| Effective: | To be entered upon final issuance |
| Expiration: | To be entered upon final issuance |



Division of Air Pollution Control
Permit-to-Install and Operate
for
CUSTOM POLY BAG COMPANY

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Authorization

Facility ID: 1576011543
Application Number(s): A0038441
Permit Number: P0105584
Permit Description: Renewal permit with revised VOC emission limitations for three flexographic printing presses based on updated calculations. K003 is the only press with a control device (enclosed chamber). Annual operating hour restrictions were established to limit facility-wide VOC emissions below 100 tpy to avoid Title V. This is the first PTIO issued to the facility.
Permit Type: Renewal
Permit Fee: \$0.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 4/27/2011
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

CUSTOM POLY BAG COMPANY
9465 EDISON STREET NE
Alliance, OH 44601

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Canton City Health Department
420 Market Avenue
Canton, OH 44702-1544
(330)489-3385

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director



Authorization (continued)

Permit Number: P0105584
 Permit Description: Renewal permit with revised VOC emission limitations for three flexographic printing presses based on updated calculations. K003 is the only press with a control device (enclosed chamber). Annual operating hour restrictions were established to limit facility-wide VOC emissions below 100 tpy to avoid Title V. This is the first PTIO issued to the facility.

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

Group Name: Printing Presses

| | |
|-----------------------------------|-------------------------------|
| Emissions Unit ID: | K001 |
| Company Equipment ID: | Flexographic Surface Printing |
| Superseded Permit Number: | 15-706 |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | K002 |
| Company Equipment ID: | HUDSON SHARP PRINTING PRESS |
| Superseded Permit Number: | 15-531 |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | K003 |
| Company Equipment ID: | Infinity |
| Superseded Permit Number: | 15-01582 |
| General Permit Category and Type: | Not Applicable |

A. Standard Terms and Conditions

1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Canton City Health Department in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting¹ a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

¹Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

B. Facility-Wide Terms and Conditions

Draft Permit-to-Install and Operate

CUSTOM POLY BAG COMPANY

Permit Number: P0105584

Facility ID: 1576011543

Effective Date: To be entered upon final issuance

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) C.1.e)(1) and g)(1).
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) C.1.b)(1)b.

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group -Printing Presses: K001, K002, K003,

| EU ID | Operations, Property and/or Equipment Description |
|--------------|---|
| K001 | Hudson Sharp Flexographic Printing Press Model: 586; Manufacturer: FMC; Press Speed: 15,000 impressions/hr; Impression Width: 46" Max.; Print Units: 6; Drying Ovens: 4 Natural Gas |
| K002 | Hudson Sharp Flexographic Printing Press Model: A-9; Manufacturer: FMC; Press Speed: 15,000 impressions/hr; Impression Width: 38" Max.; Print Units: 5; Drying Ovens: 4 Natural Gas |
| K003 | Infinity II Flexographic Printing Press Model: 1004377; Manufacturer: PCMC; Press Speed: 60,000 impressions/hr; Impression Width: 50" Max.; Print Units: 10 Enclosed Chambers; Drying Ovens: 9 Electric |

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. e)(1) and g)(1).

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)b.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|----|--|--|
| a. | OAC rule 3745-31-05(A)(3) | 18.44lbs VOC/hr for K001 7.72 lbs VOC/hr for K002 17.92 lbs VOC/hr for K003 See b)(2)a., b)(2)b., and c)(1) through (5) |
| b. | OAC rule 3745-31-05(D) Synthetic Minor to avoid Title V | 83.11 tons VOC per rolling, 12-month period for emissions units K001, K002, and K003, combined. See b)(2)c. and c(4) |
| c. | OAC rule 3745-21-09(Y)(1) | Exempt. See b)(2)d. |
| d. | 40 CFR Part 63, Subpart A (40 CFR 63.1-16) | Table 1 to Subpart KK of Part 63 list the applicability of General Provisions to Subpart KK. |



| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|----|--|---|
| e. | 40 CFR Part 63, Subpart KK (40 CFR 63.820-831) | [40 CFR 63.820(a)(2) and (3)] See b)(2)e. |

(2) Additional Terms and Conditions

- a. The Best Available Technology (BAT) requirements of this rule include compliance with the requirements of OAC rule 3745-31-05(D) and 40 CFR Part 63, Subpart KK.
- b. The permittee shall operate and maintain an enclosed chamber capture system capable of maintaining a minimum VOC control efficiency of 85% for emissions unit K003.
- c. Facility-wide emissions shall not exceed 83.11 tons of Volatile Organic Compounds (VOC) per rolling, 12-month period. The federally enforceable VOC limitation is based on maximum operating hour restrictions [See c)(4)] and is being established for the purposes of avoiding Title V applicability.

Facility-wide emissions shall be determined from a summation of monthly VOC emissions from emissions units K001, K002, and K003. These emissions units have been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the VOC emissions upon issuance of this permit.

- d. Pursuant to OAC rule 3745-21-09(Y)(2)(b), this facility is exempt from the requirements of OAC rule 3745-21-09(Y)(1) because the total maximum usage of coatings and inks employed in all flexographic, packaging rotogravure, and publication rotogravure printing lines within the facility is less than or equal to 148 tons per year.

Pursuant to OAC rule 3745-21-09(Y)(3), if at any time the facility's coating and ink usage applied in all flexographic, packaging rotogravure, and publication rotogravure printing lines exceeds 148 tons per year, the facility will no longer be eligible for the exemption under OAC rule 3745-21-09(Y)(2)(b) and shall comply with the requirements of OAC rule 3745-21-09(Y)(1).

- e. In accordance with 40 CFR 63.820(a)(2)(i) and (ii), these emissions units are existing flexographic printing presses with a facility-wide uncontrolled potential to emit (PTE) of less than 10 tons per rolling, 12-month period for any single HAP, and less than 25 tons per rolling, 12-month period for any combination of HAP. Therefore, the facility shall be considered an area source of HAP emissions and is subject only to the provisions of §§63.829(d) and 63.830(b)(1) of this subpart.

c) Operational Restrictions

- (1) Only water-base inks shall be used in emissions units K001 and K002.
- (2) The VOC content of the water-base inks employed in emissions units K001 and K002 shall not exceed 25%, by volume, of the volatile matter in the ink.

- (3) The inks used in emissions unit K003 shall not contain more than 60% VOC, by weight.
- (4) The maximum annual operating hours for emissions units K001 and K002, individually, shall not exceed 2080 hours, based on a rolling, 12-month summation of the operating hours, and the maximum annual operating hours for emissions unit K003 shall not exceed 6240 hours, based on a rolling, 12-month summation of the operating hours.

These emissions units have been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the hours of operation for each emissions unit, upon issuance of this permit.

- (5) Only nonphotochemically reactive cleanup solvents as defined in OAC 3745-21-01(C)(5) shall be employed in these emissions units.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for emissions units K001, K002, and K003:
 - a. the name and identification number for each ink and cleanup material employed;
 - b. the density, in pounds per gallon, of each ink and cleanup material employed;
 - c. the VOC content, in percent by weight, of each ink and cleanup material employed;
 - d. the non-volatile (solids) content, in percent by volume, of each ink employed;
 - e. the water content, in percent by volume; of each ink employed;
 - f. the type and volume, in gallons, of solvent employed to maintain the viscosity of inks;
 - g. the amount, in gallons, of ink employed in each emissions unit; and
 - h. the amount, in gallons, of cleanup material employed in each emissions unit.
- (2) The permittee shall calculate and maintain monthly records of the VOC emissions, and the rolling, 12-month summation of the VOC emissions for emissions units K001, K002, and K003, combined.
- (3) The permittee shall maintain monthly records of the operating hours, and the rolling, 12-month summation of the hours of operation for each emissions unit.
- (4) [40 CFR 63.829(d)]
The permittee shall maintain records of all required measurements and calculations needed to demonstrate compliance with the criteria of §63.820(a)(2), including the mass of all HAP containing materials used and the mass fraction of HAP present in each HAP containing material used, on a monthly basis.
- (5) All records, as well as any supporting analyses and computations, shall be retained in the company's files for a period of not less than five years. Copies shall be made

available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.

e) Reporting Requirements

- (1) The reports contained in this permit shall be submitted in accordance with the reporting requirements specified in Part 1 – General Terms and Conditions, Section A of this permit. Unless other arrangements have been approved by the Director (the appropriate Ohio EPA District Office or local air agency), all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) [40 CFR 63.830(b)(1)]
The permittee shall submit an initial notification to the Director (the appropriate Ohio EPA District Office or local air agency) as required in §63.9(b): If an area source that otherwise would be subject to an emission standard or other requirement established under this part if it were a major source subsequently increases its emissions of hazardous air pollutants (or its potential to emit hazardous air pollutants) such that the source is a major source that is subject to the emission standard or other requirement, such source shall be subject to the notification requirements of this section.
- (3) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying inks (i.e., for VOC content or type of ink pursuant to paragraphs c)(1) through c)(3) of this permit). The notification shall include a copy of such record and shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
- (4) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. facility-wide emissions shall not exceed 83.11 tons of VOC per rolling, 12-month period; and
 - ii. The maximum annual operating hours for emissions units K001 and K002, individually, shall not exceed 2080 hours, based on a rolling, 12-month summation of the operating hours, and the maximum annual operating hours for emissions unit K003 shall not exceed 6240 hours, based on a rolling, 12-month summation of the operating hours.
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (5) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

The permittee shall identify the following information in the annual permit evaluation report:

- a. any exceedances of the applicable emissions limitations/control measures listed in b)(1);
- b. any deviations from the operational restrictions, monitoring and record keeping requirements contained in this permit; and
- c. any exceedance of the annual exemption from OAC rule 3745-21-09(Y)(1) limitation for the coating and ink usage (148 tons) in all flexographic, packaging rotogravure, and publication rotogravure printing lines, including the date and amount of each exceedance and the proposed compliance method and schedule.

f) Testing Requirements

- (1) Compliance with the emission limitations and control measures in Section b)(1) of this permit shall be determined in accordance with the following methods:

a. Emission Limitation:

18.44 lbs VOC/hr for K001

7.72 lbs VOC/hr for K002

17.92 lbs VOC/hr for K003

Applicable Compliance Method:

The hourly VOC emission limitations above are based on each emissions unit's potential to emit, therefore, no hourly record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with the emission limitations above.

The potential to emit for each emissions unit was calculated as demonstrated below by multiplying the maximum throughput rate by the maximum VOC content:

For K001:

$(1.75 \text{ gal ink/hr})(1.15 \text{ lbs VOC/gal}) = 2.01 \text{ lbs VOC/hr inks}$

$(2.50 \text{ gal solvent/hr})(6.57 \text{ lbs VOC/gal}) = 16.43 \text{ lbs VOC/hr cleanup solvent}$

$2.01 \text{ lbs VOC/hr ink} + 16.43 \text{ lbs VOC/hr cleanup solvent} = 18.44 \text{ lbs VOC/hr}$

For K002:

$(1.00 \text{ gal ink/hr})(1.15 \text{ lbs VOC/gal}) = 1.15 \text{ lbs VOC/hr inks}$

$(1.00 \text{ gal solvent/hr})(6.57 \text{ lbs VOC/gal}) = 6.57 \text{ lbs VOC/hr cleanup solvent}$

$1.15 \text{ lbs VOC/hr ink} + 6.57 \text{ lbs VOC/hr cleanup solvent} = 7.72 \text{ lbs VOC/hr}$

For K003*:

$(4.50 \text{ gal ink/hr})(5.33 \text{ lbs VOC/gal})(27.75\%) = 6.66 \text{ lbs VOC/hr inks}$

$(6.00 \text{ gal solvent/hr})(6.765 \text{ lbs VOC/gal})(27.75\%) = 11.26 \text{ lbs VOC/hr solvent}$

$6.66 \text{ lbs VOC/hr ink} + 11.26 \text{ lbs VOC/hr solvent} = 17.92 \text{ lbs VOC/hr}$

*Emissions unit K003 employs an enclosed chamber system with an overall control efficiency (85% capture x 85% control) of 72.25%.

b. Emission Limitation:

83.11 tons VOC per rolling, 12-month period for emissions units K001, K002, and K003, combined.

Applicable Compliance Method:

Compliance shall be based on the monitoring and recordkeeping requirements as specified in d)(1) through (3) of this permit.

c. Control Measure:

The VOC content of the water-base inks employed in emissions units K001 and K002 shall not exceed 25%, by volume, of the volatile matter in the ink.

The inks used in emissions unit K003 shall not contain more than 60% VOC, by weight.

Applicable Compliance Method:

Compliance shall be based on the monitoring and recordkeeping requirements as specified in d)(1) of this permit. Formulation data or USEPA Method 24A shall be used to determine the VOC contents of the inks.

g) Miscellaneous Requirements

- (1) Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions units' maximum annual emissions for each toxic compound will be less than 1.0 ton per year. OAC Chapter 3745-31 requires



permitteesto apply for and obtain a new or modified federally enforceable permit-to-install and operate (FEPTIO) prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, which cause the emissions of any pollutant that has a listed TLV to increase above 1.0 ton per year may require the permittee to apply for and obtain a new permit.