Ohio Environmental Protection Agency
John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

Certified Mail

8/11/2011

Kenneth Turner
AMPAC PACKAGING LLC
12025 TRICON RD
Cincinnati, OH 45246

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

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1431420497
Permit Number: P0108476
Permit Type: Renewal
County: Hamilton

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI is a final action of the Director 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. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00, made payable to “Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General’s Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

If you have any questions, please contact Hamilton County Dept. of Environmental Services at (513)946-7777or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPCWeb page,www.epa.ohio.gov/dapc, by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: HCDOES

Ohio | Environmental Protection Agency

# FINAL

# Division of Air Pollution Control
# Permit-to-Install and Operate
for
AMPAC PACKAGING LLC

| | |
|---|---|
| Facility ID: | 1431420497 |
| Permit Number: | P0108476 |
| Permit Type: | Renewal |
| Issued: | 8/11/2011 |
| Effective: | 8/11/2011 |
| Expiration: | 10/2/2013 |

Ohio Environmental Protection Agency

**Division of Air Pollution Control**
**Permit-to-Install and Operate**
for
AMPAC PACKAGING LLC

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# Authorization

Facility ID: 1431420497
Application Number(s): A0042378
Permit Number: P0108476
Permit Description: Renewal FEPTIO for one 60 inch, 4 color flexographic printing press permitted under PTI 14-05115 issued 3/2/06.
Permit Type: Renewal
Permit Fee: $0.00
Issue Date: 8/11/2011
Effective Date: 8/11/2011
Expiration Date: 10/2/2013
Permit Evaluation Report (PER) Annual Date: July 1 - June 30, Due Aug 15

This document constitutes issuance to:

AMPAC PACKAGING LLC
12025 TRICON RD
CINCINNATI, OH 45246

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:

Hamilton County Dept. of Environmental Services
250 William Howard Taft Pkwy.
Cincinnati, OH 45219-2660
(513)946-7777

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: P0108476
Permit Description: Renewal FEPTIO for one 60 inch, 4 color flexographic printing press permitted under PTI 14-05115 issued 3/2/06.

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

| | |
|---|---|
| **Emissions Unit ID:** | **K001** |
| Company Equipment ID: | Flexographic Press #1 |
| Superseded Permit Number: | |
| 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 takenby 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 Hamilton County Dept. of Environmental Services 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 submitting[1] 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.

[1]Permittees 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

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) None.

   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) 2., 3., 4., 5. and 6.

2. The total allowable emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K001, K002, K004, K006, K007, K010, K013, K014, K019, K020, K022, other de minimus air contaminant sources, as defined in OAC rule 3745-15-05, and other air contaminant sources exempt from the requirement to obtain a permit-to-install pursuant to OAC rule 3745-31-03 installed subsequent to the issuance of this permit, combined, shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

3. The permittee shall collect and record the following information each month for the emissions units identified in 2.

   a) The name and identification number for each coating and cleanup material employed.

   b) The individual Hazardous Air Pollutant (HAP) content for each HAP of each coating and cleanup material in pounds of individual HAP per gallon of material, as applied.

   c) The total combined HAP content of each coating and cleanup material in pounds of combined HAPs per gallon of material, as applied [sum all the individual HAP contents from (b)].

   d) The number of gallons of each coating and cleanup material employed.

   e) The total individual HAP usage for each HAP from all coatings and cleanup materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each coating and cleanup material].

   f) The total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating and cleanup material].

   g) The updated rolling, 12-month summation of usage for each individual HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

   h) The updated rolling, 12-month summation of usage for total combined HAPs, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. This information does not have to be kept on a line-by-line basis. The HAP recordkeeping is required by 40 CFR Part 63.830(b)(1).

4. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP emission limitations outlined in 2. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June, and July through September, respectively).

5. Emission Limitation:

   9.9 TPY for any single HAP and 24.9 TPY for combined HAPs, based on a rolling 12-month summation for the emissions units listed in 2.

   Applicable Compliance Method:

   Compliance with the HAP emission limitations shall be demonstrated by the record keeping requirements specified in 3.

6. The permittee commits to and meets the criteria to be considered an area source for Hazardous Air Pollutants, and is subject only to the record keeping and reporting provisions in 40 CFR 63.829(d) and 40 CFR 63.830(b)(1).

# C. Emissions Unit Terms and Conditions

## 1. K001, Flexographic Press #1

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

4 Color Flexographic Printing Press No. 1

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. None.

(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. None.

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) | Volatile Organic Compound (VOC) emissions shall not exceed 5.46 pounds per hour and 23.91 tons per year.<br><br>The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(Y)(1)(a), OAC rule 3745-31-05(D) and 40 CFR Part 63 Subpart KK.<br><br>See b)(2)a and b)(2)b. |
| b. | OAC rule 3745-31-05(D)<br>Synthetic Minor to avoid 40 CFR Part 63 Subpart KK and Title V | See section B.2. Facility-Wide Terms and Conditions and b)(2)c. |
| c. | 40 CFR Part 63 Subpart KK | See section B.6. |
| d. | OAC rule 3745-21-09(Y)(1) | See b)(2)d. |

(2) Additional Terms and Conditions

a. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of the compliance coating, usage limitations and emissions limitations.

b. The hourly and annual emission limitations are based upon the emissions unit's Potential to Emit (PTE). Therefore, no records are required to demonstrate compliance with these limits.

c. The combined annual VOC emissions from flexographic printing presses K001, K002, K004, K006, K007, K010, K013, K014, K019 and K020 shall not exceed 8 tons per month and 96 tons per year.

d. The VOC content of any ink or coating employed in the printing line(s) shall not exceed one of the following limitations:

i. 40% VOC by volume of the coatings and inks, excluding water and exempt solvents, as determined under paragraph (B) of OAC rule 3745-21-10 of the Administrative Code for $C_{VOC,5}$; or

$$C_{VOC,5} = (100)(V_{VOC}) / (V_S + V_{VOC})$$

ii. 25% VOC by volume of the volatile matter in the coatings and inks, as determined under paragraph (B) of OAC rule 3745-21-10 of the Administrative Code for $C_{VOC,6}$.

$$C_{VOC,6} = (100)(V_{VOC}) / V_{VM}$$

c) Operational Restrictions

(1) The maximum combined annual coating usage from flexographic printing presses emissions units K001, K002, K004, K006, K007, K010, K013, K014, K019 and K020 at Ampac Plastics, Inc. shall not exceed 250,000 gallons per year, based upon a rolling, 12-month summation of the coating usage figures.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for the emissions units identified in b)(2)c.:

a. The coating usage for each month.

b. The rolling, 12-month summation of the coating usage figures.

The permittee has existing records to demonstrate compliance upon issuance of this permit.

(2) The permittee shall collect and record the following information each month for the identified in b)(2)c.:

a. The name and identification number for each coating and cleanup material employed.

b. The VOC content of the coatings and cleanup materials used in pounds per gallon, as applied.

c. The percent VOC by volume of each coating and cleanup material (excluding water and exempt solvents), as applied or the percent VOC by volume of the volatile matter in the coating.

d. The number of gallons of each coating and cleanup material employed.

e. The total combined VOC emissions, in pounds or tons per month [the sum of (b) times (d) for each coating and cleanup material].

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

(2) 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. HAP emissions limitation outlined in Section B.2.;

ii. VOC emissions limitation outlined in b)(2)c.; and

iii. The maximum combined annual coating usage of 250,000 gallons coating facility-wide outlined in c)(1).

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).

(3) The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of coating(s) with VOC contents exceeding that limitations specified in b)(2)d. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.

(4) 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.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements and Operational Restrictions specified in section b)(1), b)(2) and c)(1) shall be determined in accordance with the following methods:

a. Emission Limitation:

Volatile Organic Compound (VOC) emissions shall not exceed 5.46 pounds per hour and 23.91 tons per year.

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be determined by multiplying the maximum hourly coating rate (7 gals/hr) by the worst case VOC content of the ink (0.78 lbs/gal). Annual emissions shall be determined by multiplying the maximum hourly emission rate (5.46 lbs VOC/hr) by 8760 hrs/yr and dividing by 2000 lbs/ton..

b. Emission Limitation:

The combined annual VOC emissions from flexographic printing presses K001, K002, K004, K006, K007, K010, K013, K014, K019, K020 and K022 shall not exceed 8 tons per month and 96 tons per year.

Applicable Compliance Method:

Compliance with the monthly and annual emissions limitations shall be demonstrated by the recordkeeping requirements specified in d)(2). Compliance with the monthly limitation ensures compliance with the annual limitation.

c. Usage Limitation:

The maximum combined annual coating usage from flexographic printing presses emissions units K001, K002, K004, K006, K007, K010, K013, K014, K019, K020 and K022 at Ampac Plastics, Inc. shall not exceed 250,000 gallons per year, based upon a rolling, 12-month summation of the coating usage figures.

Applicable Compliance Method:

Compliance with the coating usage limitation shall be demonstrated by the recordkeeping requirements specified d)(1).

d. Emission Limitation:

The VOC content of the inks employed in the printing line(s) shall not exceed 40% VOC by volume of the ink, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance with the VOC content limitation in b)(2)d. shall be demonstrated by the recordkeeping requirements specified in d)(2).

Using U.S. EPA Method 24A for flexographic and rotogravure printing inks and coatings or the formulation data from the manufacturer, the VOC content shall be calculated as follows:

$C_{VOC,5} = (100)(V_{VOC}) / (V_S + V_{VOC})$

Where:

$C_{VOC,5}$ is the VOC content in percentage VOC by volume of the coating, excluding water and exempt solvents

$V_{VOC}$ is the volume fraction of VOC in the ink, calculated as:

$V_{VOC} = V_{VM} – V_W - V_{ES}$

$V_S$ is the volume fraction of solids (nonvolatile matter) in ink, in gallon of solids per gallon of ink

$V_{VM}$ is the volume fraction of volatile matter in ink, in gallon of volatile matter per gallon of ink

$V_W$ is the volume fraction of water in ink, in gallon of water per gallon of ink

$V_{ES}$ is the volume fraction of exempt solvent in ink, in gallon of exempt solvent per gallon of ink

e. Emission Limitation:

The VOC content of the inks employed in the printing line(s) shall not exceed 25% VOC by volume of the volatile matter in the ink.

Applicable Compliance Method:

Compliance with the VOC content limitation in b)(2)d. shall be demonstrated by the recordkeeping requirements specified in d)(2).

Using U.S. EPA Method 24A for flexographic and rotogravure printing inks and coatings or the formulation data from the manufacturer, the VOC content shall be calculated as follows:

$C_{VOC,6} = (100)(V_{VOC}) / V_{VM}$

Where:

$C_{VOC,6}$ is the VOC content in percentage VOC by volume of the volatile matter

$V_{VOC}$ is the volume fraction of VOC in the ink, calculated as:

$V_{VOC} = V_{VM} – V_W - V_{ES}$

$V_{VM}$ is the volume fraction of volatile matter in ink, in gallon of volatile matter per gallon of ink

$V_W$ is the volume fraction of water in ink, in gallon of water per gallon of ink

$V_{ES}$ is the volume fraction of exempt solvent in ink, in gallon of exempt solvent per gallon of ink

g) Miscellaneous Requirements

(1) None.