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

Certified Mail

9/2/2011

Dan Large
MID WEST POLY PAK INC
PO BOX 35
DOYLESTOWN, OH 44230

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)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0285000285
Permit Number: P0086361
Permit Type: OAC Chapter 3745-31 Modification
County: Wayne

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 Ohio EPA DAPC, Northeast District Office at (330)425-9171or 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

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

Cc: Ohio EPA-NEDO

Ohio | Environmental Protection Agency

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
MID WEST POLY PAK INC

Facility ID:	0285000285
Permit Number:	P0086361
Permit Type:	OAC Chapter 3745-31 Modification
Issued:	9/2/2011
Effective:	9/2/2011
Expiration:	9/2/2016

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
MID WEST POLY PAK INC

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Authorization

Facility ID: 0285000285
Application Number(s): A0017083, A0041968
Permit Number: P0086361
Permit Description: FEPTIO for three printing presses, emissions units K001 (6-color flexographic printing press), K002 (2-color flexographic), and K003 (6-color flexographic printing press).
Permit Type: OAC Chapter 3745-31 Modification
Permit Fee: $600.00
Issue Date: 9/2/2011
Effective Date: 9/2/2011
Expiration Date: 9/2/2016
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

MID WEST POLY PAK INC
89 E MARION
Doylestown, OH 44230

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:

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330)425-9171

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: P0086361
Permit Description: FEPTIO for three printing presses, emissions units K001 (6-color flexographic printing press), K002 (2-color flexographic), and K003 (6-color flexographic printing press).

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

Group Name: Printing Presses: K001-3

Emissions Unit ID:	**K001**
Company Equipment ID:	Six (6) Color Flexographic Printing Press
Superseded Permit Number:	02-6470
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**K002**
Company Equipment ID:	Duo Flexographic Printing Press
Superseded Permit Number:	02-8950
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**K003**
Company Equipment ID:	Simon 47.5" 6-color flexographic press
Superseded Permit Number:	02-13318
General Permit Category andType:	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 Ohio EPA DAPC, Northeast District Office 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) None.

C. Emissions Unit Terms and Conditions

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

EU ID	Operations, Property and/or Equipment Description
K001	6-Color Station Stack flexographic printing press
K002	Duo Flexographic Printing Press
K003	Six-color Simon 47.5" Flexographic Printing Press

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. d)(4).

(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)(2)c, b)(2)d, d)(1)e, d)(2)c, d)(2)e, e)(2), f)(1)b, f)(1)c and f)(1)d.

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 3745-21-09(Y)(1) - (3)	See b)(2)a and b)(2)b.
b.	OAC rule 3745-31-05(D)(1)(a)	See b)(2)c, b)(2)d and b)(2)h.
c.	OAC rule 3745-31-05(A)(3) As effective 11/30/2001	See b)(2)i and b)(2)j.
d.	OAC rule 3745-31-05(A)(3)(a)(ii) As effective 12/01/2006	See b)(2)k.
e.	40 CFR Part 63, Subpart KK	Exempt. See b)(2)d, b)(2)e, b)(2)f and b)(2)g.
f.	ORC 3704.03(F)	See d)(4).

(1) Additional Terms and Conditions

a. 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.

b. 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; or if at any time the annual volatile organic compound (VOC) usage in all coatings and inks employed in all flexographic, packaging rotogravure, and publication rotogravure printing lines exceeds 100 tons, the facility will no longer be eligible for the exemption under OAC rule 3745-21-09(Y)(2)(b) and (d) and shall comply with the requirements of OAC rule 3745-21-09(Y)(1).

c. VOC emissions, based upon a rolling, 12-month summation, shall not exceed the following:

i. 26.0 tons per year from emissions unit K001;

ii. 9.0 tons per year from emissions unit K002; and

iii. 40.81 tons per year from emissions unit K003.

d. The permittee has chosen to commit to, and to meet the following criteria for the purposes of establishing the facility to be an area source and is not subject to 40 Code of Federal Regulation (CFR) Part 63, Subpart KK, Standards for Hazardous Air Pollutant Emissions from the Printing and Publishing Industries:

i. Use no more than 9.9 tons per rolling, 12-month period of any individual hazardous air pollutant (HAP) at the facility, including materials used for all publication rotogravure products, packaging rotogravure, and wide-web flexographic printing presses, as defined in 40 CFR Part 63, Subpart KK, or purposes other than printing and publishing; and

ii. Use no more than 24.9 tons per rolling, 12-month period of total combined HAPs at the facility, including materials used for all publication rotogravure products, packaging rotogravure, and wide-web flexographic printing presses, as defined in 40 CFR Part 63, Subpart KK, or purposes other than printing and publishing.

e. The following material may be excluded for HAP usage:

i. used in routine janitorial or facility grounds maintenance;

ii. personal uses by employees or other persons;

iii. the use of products for the purpose of maintaining electric, propane, gasoline and diesel powered motor vehicles operated by the facility; and

iv. the use of HAP contained in intake water (used for processing or noncontact cooling) or intake air (used wither as compressed air or for combustion).

f. If the permittee, subsequently exceeds either of the thresholds, as specified in section b)(2)d above, for any rolling, 12-month period (without first obtaining and complying with other limits that keep its potential to emit HAP below major source

levels), this facility shall be considered in violation and shall be a major source of HAP beginning with the first month after the end of the 12-month period in which either of the HAP-use thresholds was exceeded. As a major source of HAP, the permittee shall be subject to the Title V requirements and the requirements as specified in §63.820(a)(1) of 40 CFR Part 63, Subpart KK, even if during the subsequent 12-month periods the facility uses less HAP than the thresholds in section b)(2)d above.

g. If the permittee chooses to no longer be subject to section b)(2)d above, and becomes a major source of HAP, the Administrator of U.S. EPA shall be notified. The permittee must continue to comply with the HAP usage limitation as specified in section b)(2)d above until the facility is in compliance with all relevant requirements as specified in 40 CFR Part 63, Subpart KK.

h. Emissions units K001, K002 and K003 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 emissions from these emissions units, upon issuance of this permit. The annual VOC emissions for each emissions unit shall not exceed the limits in section b)(2)c above, as well as the facility-wide emissions of any individual HAP and total combined HAPs in section b)(2)d above.

i. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05 (A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutant less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's state Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirements to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.

j. VOC emissions from emissions unit K002 shall not exceed 8.18 pounds per hour.

k. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05 (A)(3)(a)(ii) do not apply to VOC emissions from emissions unit K002 since VOC emissions from emissions unit K002 are restricted to less than 10 tons per year.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for each emissions unit and shall maintain the information at the facility for 5 years:

a. the company identification for each coating, ink, and cleanup material employed;

b. the number of gallons or pounds of each coating, ink, and cleanup material employed during the month;

c. the VOC content of each coating, ink, and cleanup material, in pounds per gallon or percent by weight;

d. the total VOC emission rate for each emissions unit, in pounds per month, i.e., ∑(b X c), for all the materials applied during the month;

e. the rolling, 12-month summation of VOC emissions, in tons;

f. each individual HAP content of each coating, ink, and cleanup material, in pounds per gallon or percent by weight;

g. each individual HAP emission rate for each emissions unit, in pounds per month, i.e., ∑(b X f), for all the materials applied during the month;

h. the total combined HAPs content of each coating, ink and cleanup material, in pounds per gallon or percent by weight; and

i. the total combined HAPs emission rate for each emissions unit, in pounds per month, i.e., ∑(b X h), for all the materials applied during the month.

(2) The permittee shall keep the following facility-wide information each month:

a. the monthly usage of coatings and inks employed in all flexographic, packaging rotogravure, and publication rotogravure printing lines within the facility;

b. the monthly facility-wide individual HAP emissions, in tons per month;

c. the rolling, 12-month summation of facility-wide individual HAP emissions, in tons;

d. the monthly facility-wide total combined HAPs emissions, in tons per month; and

e. the rolling, 12-month summation of facility-wide total combined HAPs emissions, in tons.

(3) The permittee shall keep the following daily records for emissions unit K002:

a. the company identification for each coating, ink, and cleanup material employed;

b. the number of gallons or pounds of each coating, ink, and cleanup material employed;

c. the VOC content of each coating, ink, and cleanup material, in pounds per gallon or percent by weight;

d. the daily VOC emissions, in pounds per day, i.e., ∑(b X c), for all the materials applied during the day;

e. the total operating hours; and

f. the average hourly VOC emissions, in pounds per hour.

[Note: After U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the Ohio SIP, section d)(3) shall be voided entirely.]

(4) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit K001 was installed before May, 1986, and emissions units K002 and K003 maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified 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 that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new FEPTIO.

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. an identification of each month during which the rolling, 12-month facility-wide individual HAP emissions exceeded 9.9 tons, and the actual rolling, 12-month facility-wide individual HAP emissions for each such month;

ii. an identification of each month during which the rolling, 12-month facility-wide total combined HAPs emissions exceeded 24.9 tons, and the actual rolling, 12-month facility-wide total combined HAPs emissions for each such month;

iii. an identification of each month during which the VOC emissions exceeded the following limits, and actual VOC emissions for each such month and each such emissions unit:

(a) 26.0 tons per year from emissions unit K001;

(b) 9.0 tons per year from emissions unit K002; and

(c) 40.81 tons per year from emissions unit K003.

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) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12-months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) Compliance with the emission limitations in section b) and operational restriction in section c) of these terms and conditions shall be determined in accordance with the following methods:

a. <u>Emission Limitation</u>:

The VOC emissions from emissions unit K002 shall not exceed 8.18 pounds per hour.

<u>Applicable Compliance Method:</u>

Compliance shall be demonstrated based upon the record keeping requirements specified in section d)(3)f above. If required, the permittee shall demonstrate compliance by emission testing in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25A.

[Note: After U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the Ohio SIP, section f)(1)a shall be voided entirely.]

b. Emission Limitations:

The VOC emissions, based upon a rolling, 12-month summation, shall not exceed the following:

i. 26.0 tons per year from emissions unit K001;

ii. 9.0 tons per year from emissions unit K002; and

iii. 40.81 tons per year from emissions unit K003.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section d)(1)e above.

c. Emission Limitation:

Facility-wide individual HAP emissions shall not excedd 9.9 tons per year, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section d)(2)c above.

d. Emission Limitation:

Facility-wide total combined HAPs emissions shall not exceed 24.9 tons per year, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section d)(2)e above.

e. Emission Limitation:

The total maximum usage of coatings and inks employed in all flexographic, packaging rotogravure, and publication rotogravure printing lines within the facility shall be less than or equal to 148 tons per year

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section d)(2)a above and shall be the sum for the calendar year.

(2) Any determination of VOC content, solids contents, or density of coating material, inks, or cleanup material shall be based on the materials as employed (as applied), including the addition of any thinner or viscosity reducer to the materials. In accordance with OAC rule 3745-21-04(B)(5), the permittee shall determine the composition of the coatings,

inks, or cleanup material by formulation data supplied by the manufacturer, or from data determined by an analysis of each coating, inks, or cleanup material, as applied, by Reference Method 24 or Method 24A. If, pursuant to Method 24 or Method 24A of 40 CFR Part 60, Appendix A (revised as of July 1, 2001), an owner or operator determines that Method 24 or Method 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 and/or Method 24A.

g) Miscellaneous Requirements

(1) None.