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

11/3/2011

Pamela Blakley *Via E-Mail Notification*
United States Environmental Protection Agency
Mail Code: AR-18J
77 West Jackson Blvd.

Chicago, IL 60604-3507

RE: PROPOSED AIR POLLUTION TITLE V PERMIT
Facility Name: Bemis Company, Inc.
Facility ID: 1677000105
Permit Type: Significant Permit Modification, Off-Permit Change
Permit Number: P0106317

Dear Ms. Blakley:

A proposed OAC Chapter 3745-77 Title V permit for the referenced facility has been issued for review by U.S. EPA. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page http://www.epa.ohio.gov/dapc in Microsoft Word and Adobe Acrobat format. If U.S. EPA does not object to this proposed permit, the permit will be processed for issuance as a final action not less than 45 days from the date of this letter. Please contact me at (614) 644-3631 by the end of the 45 day review period if you wish to object to the proposed permit.

Sincerely,

Michael W. Ahern

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

Cc: Akron Regional Air Quality Management District

50 West Town Street, Suite 700
P.O. Box 1049
Columbus, OH 43216-1049

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www.epa.ohio.gov

Ohio | Environmental Protection Agency

PROPOSED

Division of Air Pollution Control
Title V Permit
for
Bemis Company, Inc.

Facility ID:	1677000105
Permit Number:	P0106317
Permit Type:	Significant Permit Modification, Off-Permit Change
Issued:	11/3/2011
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Ohio Environmental Protection Agency

Division of Air Pollution Control
Title V Permit
for
Bemis Company, Inc.

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Authorization

Facility ID: 1677000105
Facility Description: Paper coating & laminated, packaging.
Application Number(s): A0039454, A0039580
Permit Number: P0106317
Permit Description: Significant Title V Permit Modification to add the new flexographic printing press (K021) and the new plating making process (P010) and to update the terms and conditions to make them consistent with the modified Permits to Install. This facility consists of six flexographic printing lines (K003, K008, K010, K016, K020, and K021), a plate making process (P010), and several insignificant emissions units.
Permit Type: Significant Permit Modification, Off-Permit Change
Issue Date: 11/3/2011
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number: P0106172

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

Bemis Company, Inc.
1972 AKRON PENINSULA RD.
AKRON, OH 44313

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

Akron Regional Air Quality Management District
146 South High Street, Room 904
Akron, OH 44308
(330)375-2480

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Akron Regional Air Quality Management District. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months (540 days) and no later than 6 months (180 days) prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions

(2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions

(3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting

(4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

(1) The date, place (as defined in the permit), and time of sampling or measurements.

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) The operating conditions existing at the time of sampling or measurement.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

c) The permittee shall submit required reports in the following manner:

(1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any scheduled maintenance, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

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

(2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive

measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

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

(3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the

insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

(4) Each written report shall be signed by a responsible official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."

(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

(5) Reports of any required monitoring and/or record keeping information shall be submitted to Akron Regional Air Quality Management District.

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

3. Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

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

4. Risk Management Plans

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. ("Act"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or

b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

5. Title IV Provisions

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

(Authority for term: OAC rule 3745-77-07(A)(5))

6. Severability Clause

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

(Authority for term: OAC rule 3745-77-07(A)(6))

7. General Requirements

a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with Standard Term and Condition A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d) This permit does not convey any property rights of any sort, or any exclusive privilege.

e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the

Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

(1) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or

(2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or

(3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminent sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

8. Fees

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

(Authority for term: OAC rule 3745-77-07(A)(8))

9. Marketable Permit Programs

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

(Authority for term: OAC rule 3745-77-07(A)(9))

10. Reasonably Anticipated Operating Scenarios

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

(Authority for term: OAC rule 3745-77-07(A)(10))

11. Reopening for Cause

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

a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

12. Federal and State Enforceability

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

(Authority for term: OAC rule 3745-77-07(B))

13. Compliance Requirements

a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

(1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.

(3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

(4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c) The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

(1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

(2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:

(1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.

(2) Compliance certifications shall include the following:

a. An identification of each term or condition of this permit that is the basis of the certification.

b. The permittee's current compliance status.

c. Whether compliance was continuous or intermittent.

d. The method(s) used for determining the compliance status of the source currently and over the required reporting period.

e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

(3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

14. Permit Shield

a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

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

(Authority for term: OAC rule 3745-77-07(F))

15. Operational Flexibility

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

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

16. Emergencies

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

(Authority for term: OAC rule 3745-77-07(G))

17. Off-Permit Changes

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

a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.

b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).

d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

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

(Authority for term: OAC rule 3745-77-07(I))

18. Compliance Method Requirements

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

(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

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

(Authority for term: OAC rule 3745-77-07(A)(1))

20. Permit to Install Requirement

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

(Authority for term: OAC rule 3745-77-07(A)(1))

21. Air Pollution Nuisance

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

(Authority for term: OAC rule 3745-77-07(A)(1))

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the responsible official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the responsible official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that 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 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

No emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-01)

23. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.

b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.

c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11))

24. Reporting Requirements Related to Monitoring and Record Keeping RequirementsUnder State Law Only

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

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

25. Records Retention RequirementsUnder State Law Only

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

26. Inspections and Information Requests

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

(Authority for term: OAC rule 3745-77-07(C))

27. Scheduled Maintenance/Malfunction Reporting

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

28. Permit Transfers

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

(Authority for term: OAC rule 3745-77-01(C))

29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or

b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or

c) where the company's responsible official has certified that an emissions unit has been permanently shut down.

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

   a) 8.

2. Bemis Company, Inc. requested the following emission limitations: [The volatile organic compound (VOC) emission limitation is established to avoid Prevention of Significant Deterioration (PSD) permitting. The hazardous air pollutant (HAP) emission limitations are established to avoid being subject to the National Emission Standard for the Printing and Publishing Industry (40 CFR Part 63, Subpart KK).]

   a) The emissions of any individual HAP from emissions units K003, K008, K010, K016, K020, K021, P010, T001, T002, and T003, combined, shall not exceed 9.0 tons per year, based upon a rolling, 12-month summation of the monthly emission rates.

   b) The emissions of combined HAPs from emissions units K003, K008, K010, K016, K020, K021, P010, T001, T002, and T003, combined, shall not exceed 24.0 tons per year, based upon a rolling, 12-month summation of the monthly emission rates.

   c) The emissions of VOC from emissions units K003, K008, K010, K016, K020, T001, T002, and T003, combined, shall not exceed 358.9 tons per year, based upon a rolling, 12-month summation of the monthly emission rates.

   [Authority for term: OAC rule 3745-31-05(D) and OAC rule 3745-77-07(A)(1)]

3. In order to determine compliance with the emission limitations in 2 above, the permittee shall maintain monthly records of the following information:

   a) For emissions units K003, K008, K010, K016, K020, and K021:

      (1) A unique name or identification number for each ink, coating, thinning solvent and cleanup solvent used;

      (2) The VOC content of each ink, coating, thinning solvent and cleanup solvent used, in percent by weight;

      (3) The individual HAP content for each HAP of each ink, coating, thinning solvent and cleanup solvent used, in percent by weight;

      (4) For any material that is vented to the catalytic oxidizer all of the time, the total pounds of each ink, coating, thinning solvent and cleanup solvent used;

      (5) For any material that is vented to atmosphere either all of the time or part of the time, keep the following records on a by station basis;

         a. The total pounds of each ink, coating, thinning solvent and cleanup solvent used on a station with emissions controlled by the catalytic oxidizer;

         b. The total pounds of each ink, coating, thinning solvent and cleanup solvent used on a station with emissions vented directly to atmosphere;

(6) A unique name or identification number for each type of waste collected for disposal;

(7) The VOC content of each type of waste collected for disposal, in percent by weight;

(8) The total pounds of each type of waste collected for disposal;

(9) The linear feet produced by each emission unit; and

(10) The total linear feet produced by all of the emissions units combined.

These records may be kept on a line by line basis or for the materials that are always controlled by the catalytic oxidizer the amount assigned to each line may be estimated based on the ratio of the linear feet produced on a given line divided by the total linear feet produced by all of the emissions units combined.

b) For emissions unit P010:

(1) The total pounds of film cleaning materials used;

(2) The total pounds of plate wash materials used;

(3) The individual HAP content for each HAP of each film cleaning material and each plate wash material used, in percent by weight;

(4) The total pounds of plate wash materials retained in still bottoms as part of the reclaim process; and

(5) The individual HAP content for each HAP of the plate wash material retained in still bottoms as part of the reclaim process, in percent by weight.

c) For emissions units T001, T002, and T003:

(1) The three storage tanks combined were determined to have potential emissions of 3 tons per year (or 0.25 tons per month). This may be used to estimate emissions for demonstration of compliance (e.g. VOC = 3 tons per year, combined for T001, T002, and T003, HAP = 1 ton per year per tank times the weight fraction of HAP of the material stored in the storage tank), or

(2) Keep records of the monthly solvent composition and throughput along with sufficient physical tank construction data to calculate the working and breathing losses of each storage tank using the last version of US EPA Tanks emissions estimation software.

d) The site wide consumption of natural gas.

e) Each month the permittee shall calculate and record the following values for the previous month as well as the summation of the values for the previous 12-month period. Any credible method for performing these calculations is acceptable so long as the permittee retains records showing how they were completed.

(1) For each emissions unit, the calculated actual individual HAP emission rate for each HAP, in ton(s) per month*.

(2) For the combustion of natural gas, the calculated actual individual HAP emission rate for each HAP, in ton(s) per month, using established US EPA emission factors.

(3) The individual HAP emissions for each HAP for the last 12-month period for emissions units K003, K008, K010, K016, K020, K021, P010, T001, T002, and T003, combined, shall be summed with the individual HAP emissions for each HAP from the combustion of natural gas for the last 12-month period and compared to the emission limitation contained in 2.a) above.

(4) For each emissions unit, the calculated actual combined HAP emission rate in tons per month*.

(5) For the combustion of natural gas, the calculated actual combined HAP emission rate in tons per month using established US EPA emission factors.

(6) The combined HAP emissions for the last 12-month period for emissions units K003, K008, K010, K016, K020, K021, P010, T001, T002, and T003, combined, shall be summed with the combined HAP emissions from the combustion of natural gas for the last 12-month period and compared to the emission limitation contained in 2.b) above.

(7) For each emissions unit, the calculated actual VOC emission rate in tons per month*.

(8) For the combustion of natural gas, the calculated actual VOC emission rate in tons per month using established US EPA emission factors.

(9) The VOC emissions for the last 12-month period for emissions units K003, K008, K010, K016, K020, T001, T002, and T003, combined, shall be summed with the VOC emissions from the combustion of natural gas for the last 12-month period and compared to the emission limitation contained in 2.c) above.

*The permittee may take into account any quantifiable HAP and/or VOC retained in waste as well as the catalytic oxidizer's overall control efficiency in making these calculations. The overall control efficiency incorporated into the calculations must be the efficiency determined during the most recent emission test that demonstrated the emissions unit was in compliance.

[Authority for term: OAC rule 3745-31-05 and OAC rule 3745-77-07(C)(1)]

4. The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a) all exceedances of the rolling, 12-month emission limitation for VOC;

b) all exceedances of the rolling, 12-month emission limitation for any individual HAP; and

c) allexceedances of the rolling, 12-month emission limitation for the total combined HAPs.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-31-05 and OAC rule 3745-77-07(C)(1)]

5. Compliance with the emission limitations in 2 above shall be determined in accordance with the following methods:

   a) Emission Limitations:

   The emissions of any individual HAP from emissions units K003, K008, K010, K016, K020, K021, P010, T001, T002, and T003, combined, shall not exceed 9.0 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

   The emissions of combined HAPs from emissions units K003, K008, K010, K016, K020, K021, P010, T001, T002, and T003, combined, shall not exceed 24.0 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

   The emissions of VOC from emissions units K003, K008, K010, K016, K020, T001, T002, and T003, combined, shall not exceed 358.9 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

   Applicable Compliance Method:

   Compliance with the annual emission limitations above shall be demonstrated through the record keeping requirements established in 3.a), 3.b), 3.c), 3.d), and 3.e) above.

   When required, formulation data or USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the VOC contents of the coatings and inks. Formulation data shall be used to determine the HAP contents of the coatings, inks and solvents.

   [Authority for term: OAC rule 3745-31-05 and OAC rule 3745-77-07(C)(1)]

6. When required by a term and condition in Section C below to utilize a catalytic oxidizer to control emissions, the catalytic oxidizer shall be operated in accordance with the following:

   a) Monitoring and/or Recordkeeping Requirements

      (1) The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the temperature immediately upstream and downstream of the oxidizer's catalyst bed when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Temperature units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within ± 1 percent of the temperature being measured or ± 5 degrees Fahrenheit, whichever is greater. The temperature monitors and recorder(s) shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:

         a. all 3-hour blocks of time, when the emissions unit(s) controlled by the catalytic oxidizer was/were in operation, during which the average temperature of the exhaust gases immediately before the catalyst bed was less than 481 degrees Fahrenheit or was more than 50 degrees Fahrenheit below the average

temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance;

b. all 3-hour blocks of time, when the emissions unit(s) controlled by the catalytic oxidizer was/were in operation, during which the average temperature difference across the catalyst bed was less than 41 degrees Fahrenheit or was less than 80 percent of the average temperature difference measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance; and

c. A log of operating time for the capture (collection) system, catalytic oxidizer, monitoring equipment, and the associated emissions unit(s). The permittee may use the current temperature chart as the log documenting that the monitoring equipment and control device are operating. Bypass of the collection system by the emissions unit(s) shall be logged as to the date and time.

The permittee may use a temperature chart recorder or equivalent recording device as the log that documents the temperature differential across the catalyst bed. These records shall be maintained at the facility for a period of no less than 3 years.

[Authority for term: OAC rule 3745-21-09(B)(3)(l), OAC rule 3745-21-09(B)(3)(n), OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.3]

(2) Whenever the monitored average temperature of the exhaust gases immediately before the catalyst bed deviates from the range or limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range(s)/limit(s) specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

a. a description of the corrective action;

b. the date corrective action was completed;

c. the date and time the deviation ended;

d. the total period of time (in minutes) during which there was a deviation;

e. the temperature of the exhaust gases immediately before the catalyst after the corrective action was implemented; and

f. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

An acceptable value for the average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, cannot be less than 481 degrees Fahrenheit or cannot be more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance.

The value above is effective for the duration of this permit, unless revisions are requested by the permittee and approved by the Director. The permittee may request revisions to the value above based upon information obtained during future emission tests that demonstrate compliance with the allowable VOC emission rates for the emissions units that are vented to the catalytic oxidizer. In addition, approved revisions to the value will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.3]

(3) The catalytic oxidizer shall be operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals, including any modifications deemed necessary by the permittee. The catalyst conversion efficiency shall be evaluated and compared to typical values for fresh catalyst. Any findings that the conversion efficiency is beyond the operational range of the catalyst, as defined by the manufacturer, is not necessarily indicative of an emission violation but rather serves as a trigger level for maintenance and/or repair activities, or further investigation to establish proper operation of the catalytic oxidizer. Solvent loading during the catalyst analysis shall be consistent with the test laboratory's normal testing protocol.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.3]

(4) The permittee shall perform an inspection of the catalytic oxidizer, including the catalyst bed, on at least an annual basis. Each inspection shall consist of internal and visual inspections in accordance with the manufacturer's recommendations, as specified in the document entitled "Recommended Annual Inspection Points and Procedures" as submitted to the Ohio EPA on February 26, 2002 or as revised by the manufacturer, and shall include a physical inspection of the unit and checks of associated equipment, including but not limited to burners, controls, dampers, valves, and monitoring and recording equipment. Revisions to the "Recommended Annual Inspection Points and Procedures" document shall be submitted to the Akron Regional Air Quality Management District for review prior to implementation. Repair and replacement of equipment shall be performed as determined by the inspection. In accordance with the

testing schedule in c)(1) below, a sample of catalyst material shall be collected from the catalyst bed to perform the catalyst activity tests required in c)(1) below. The permittee shall also perform weekly inspections of the external integrity of the catalytic oxidizer.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 64.7(c), and 40 CFR Part 64.9(b)]

(5) The permittee shall maintain a record of the results of each annual and weekly inspection of the catalytic oxidizer, as well as the results of each catalyst activity test required in c)(1) below.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 64.7(c), and 40 CFR Part 64.9(b)]

b) Reporting Requirements

(1) The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of the emissions unit(s):

a. all 3-hour blocks of time (when required by a term and condition in Section C to utilize a catalytic oxidizer to control emissions) during which the average temperature of the exhaust gases immediately before the catalyst bed (as determined by the continuous temperature monitor) was less than 481 degrees Fahrenheit or was more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance;

b. all 3-hour blocks of time (when required by a term and condition in Section C to utilize a catalytic oxidizer to control emissions) during which the average temperature difference across the catalyst bed was less than 41 degrees Fahrenheit or was less than 80 percent of the average temperature difference measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance;

c. a summary of the operating time for the capture (collection) system, catalytic oxidizer, monitoring equipment, and the emissions unit(s);

d. an identification of each incident of deviation described in b)(1)a. above where a prompt investigation was not conducted;

e. an identification of each incident of deviation described in b)(1)a. above where prompt corrective action, that would bring the average temperature of the exhaust gases immediately before the catalyst bed into compliance with the acceptable value, was determined to be necessary and was not taken; and

f. an identification of each incident of deviation described in b)(1)a. above where proper records were not maintained for the investigation and/or the corrective action.

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

[Authority for term: OAC rule 3745-21-09(B)(3)(m), OAC rule 3745-77-07(C)(1), and 40 CFR Part 64.9(a)]

NOTE: Information submitted pursuant to b)(1)b. above is not relevant for determining compliance with any operational restrictions and monitoring and record keeping contained in a) above.

(2) The permittee shall submit reports that include the results of the catalyst activity tests required in c)(1) below and a description of any repairs, maintenance, and/or further investigation taken to ensure the proper operation of the catalytic oxidizer. These reports shall be submitted within 45 days after each catalyst activity test is performed.

[Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-77-07(C)(1), and 40 CFR Part 64.9(a)]

(3) The permittee shall submit quarterly deviation (excursion) reports that identify the findings of any inspection that determined the external structural integrity of the catalytic oxidizer has been jeopardized and it no longer operates as designed.

[Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-77-07(C)(1), and 40 CFR Part 64.9(a)]

(4) The permittee shall submit annual reports that summarize the results of each annual inspection of the internal integrity of the catalytic oxidizer, based on records maintained pursuant to a)(4) above. These reports shall be submitted within 45 days after each inspection is performed.

[Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-77-07(C)(1), and 40 CFR Part 64.9(a)]

c) Testing Requirements

(1) The permittee shall conduct, or have conducted, catalyst activity testing using the catalyst sample collected during the annual inspection described in a)(4) above. An intent to test notification shall not be required for the testing noted in this term. The procedures for the catalyst activity test shall be in accordance with the manufacturer's recommendations.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

(2) The permittee shall conduct, or have conducted, emission testing for the catalytic oxidizer in accordance with the following requirements:

a. The emission testing shall be conducted within 6 months prior to permit expiration.

b. The emission testing shall be conducted to demonstrate compliance with the 90 percent, by weight control (destruction) efficiency limitation for VOC.

c. The control (destruction) efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on aconsideration of the potential presence of interfering gases.

d. The test(s) shall be conducted while the emissions units that are vented to the catalytic oxidizer are operating at or near their maximum capacities, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

e. During each control (destruction) efficiency test run, the permittee shall measure the following:

i. the temperature of the exhaust gases immediately before the catalyst bed, in degrees F; and

ii. the temperature difference across the catalyst bed, in degrees F.

[Authority for term: OAC rule 3745-21-10(C), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(C)(1)]

(3) Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

(4) Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

(5) A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s).The permittee may request additional time for the submittal of the written report, where

warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

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

T001	Above ground storage tank for solvent - Tank 1 (PTI 16-957)
T002	Above ground storage tank for solvent - Tank 2 (PTI 16-957)
T003	Above ground storage tank for solvent - Tank 3 (PTI 16-957)

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within the identified permit to install for the emissions unit. Insignificant emissions units listed above that are not subject to specific permit to install requirements are subject to one or more applicable requirements contained in the federally – approved versions of OAC Chapters 3745-17, 3745-18, and/or 3745-21.

[Authority for term: OAC rule 3745-77-07(A)(13)]

8. The following insignificant emissions units located at this facility are exempt from permit requirements because they are not subject to any applicable requirements (as defined in OAC rule 3745-77-01(H)) or because they meet the "de minimis" criteria established in OAC rule 3745-15-05:

P011	Electric oven used to eliminate curl in finished product - Curl Oven 1
P012	Electric oven used to eliminate curl in finished product - Curl Oven 2
P013	Micro Clean Sand Blast Cleaner
P014	Micro Clean Hand Blast Cleaner
P015	Flammable solvent recovery system consisting of a CST, DST, and a distillation unit
P016	Plate making solvent recovery system consisting of a CST, DST, and a distillation unit

C. Emissions Unit Terms and Conditions

1. K021, Vision 2

Operations, Property and/or Equipment Description:

flexographic printing press with in-line adhesive station and in-line flexo station - Vision 2.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) g)(1).

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)	The emissions of volatile organic compounds (VOC) from this emissions unit which include the central impression (CI) station, in-line adhesive station, and in-line flexo station shall not exceed 16.22 pounds of per hour. (See b)(2)a. below.) For the CI station and in-line flexo station: The CI station and in-line flexo station shall be equipped with a capture system and associated control system which are designed and operated to achieve a control (destruction) efficiency which is at least 95 percent, by weight, and a capture efficiency which is at least 90 percent, by weight, for VOC. For the in-line adhesive station: The in-line adhesive station shall be equipped with a capture system and associated control system which are designed and operated to achieve a control (destruction) efficiency which is at

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		least 95 percent, by weight, and a capture efficiency which is at least 90 percent, by weight, for VOC, or the VOC content of the coatings and inks shall not exceed the following: i. forty percent VOC by volume of the coating and ink, excluding water and exempt solvents; or ii. twenty-five percent VOC by volume of the volatile matter in the coating and ink. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(D) (synthetic minor to avoid nonattainment NSR and MACT applicability under 40 CFR Part 63, Subpart KK)	The emissions of VOC from this emissions unit which includes the CI station, the in-line adhesive station, and the in-line flexo station shall not exceed 22.0 tons per year, based upon a rolling, 12-month summation of the monthly emissions. For avoiding MACT applicability, see 2, 3, 4, and 5 of Section B - Facility-Wide Terms and Conditions.
c.	OAC rule 3745-21-09(Y)(1)(a)	The emission limitations specified by this rule are equivalent to the emission limitations established pursuant to OAC rule 3745- 31-05(A)(3).
d.	OAC rule 3745-21-09(Y)(1)(b)	The emission control requirements based on this applicable rule are less stringent than the emission control requirements established pursuant to OAC rule 3745-31-05(A)(3).
e.	OAC rule 3745-21-09(Y)(4)(a)(i)(*c*)	The emission control requirement based on this applicable rule is less stringent than the emission control requirements established pursuant to OAC rule 3745-31-05(A)(3).
f.	OAC rule 3745-21-09(Y)(4)(a)(ii)	When the emissions from the in-line adhesive station are venting to the atmosphere: The VOC content of the coatings and inks employed shall not exceed 0.8 pound of VOC per pound of

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		solids applied or 0.16 pound of VOC per pound of coating or ink applied. The VOC content limits specified above may be met by averaging the VOC content of materials used on a single press, within a single printing line.
g.	OAC rule 3745-21-09(Y)(4)(b)	VOC emissions from cleanup materials shall be minimized by keeping cleaning materials and used shop towels in closed containers and convey cleaning materials from one location to another in closed containers or pipes.
h.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)c. below.
i.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	The emissions from the natural gas fired dryer ovens shall not exceed the following: 0.28 pound of nitrogen oxides (NO_x) per hour and 1.20 tons of NO_x per year. 0.23 pound of carbon monoxide (CO) per hour and 1.01 tons of CO per year. 0.02 pound of particulate emissions (PE) per hour and 0.09 ton of PE per year. 0.002 pound of sulfur dioxide (SO_2) per hour and 0.01 ton of SO_2 per year. See b)(2)b. and b)(2)d. below.
g.	40 CFR Part 64	See d)(2) through d)(7), d)(12), e)(2), and e)(3) below and 6.a)(1) through 6.a)(5) and 6.b)(1) through 6.b)(4) of Section B - Facility-Wide Terms and Conditions.

(2) Additional Terms and Conditions

a. The hourly VOC emission limitation is based on the emissions unit's potential to emit. Therefore, no record keeping or reporting is required to demonstrate compliance with this emission limitation.

b. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (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 the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) 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 requirement 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 OAC rule 3745-31-05, then these emission limitations/control measures no longer apply. The following terms and conditions shall become void after U.S. EPA approves the rule revision: b)(1)i., b)(2)d., f)(6)f., f)(6)g., f)(6)h., f)(6)i., and f)(6)j.

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

The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the uncontrolled NO_x, PE, CO and SO_2 emissions from this air contaminant source since the potential to emit for NO_x, PE, CO and SO_2 is less than ten tons per year.

d. The hourly and annual NO_x, CO, PE, and SO_2 emission limitations are based on the emissions unit's potentials to emit. Therefore, no record keeping or reporting is required to demonstrate compliance with these emission limitations.

c) Operational Restrictions

(1) The VOC emissions from the CI station and the in-line flexo station shall be vented to the catalytic oxidizer when the emissions unit is in operation.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]

(2) When employing a coating on the in-line adhesive station that meets the requirements of OAC rules 3745-21-09(Y)(1)(a) and (Y)(4)(a)(ii), the VOC emissions from the in-line adhesive station may be vented to the atmosphere.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]

(3) When employing a coating on the in-line adhesive station that does not meet the requirements of OAC rules 3745-21-09(Y)(1)(a) and (Y)(4)(a)(ii), the VOC emissions shall be vented the catalytic oxidizer.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain records documenting any time periods when the emissions unit was in operation and the emissions from the emissions unit were not vented to the catalytic oxidizer except for time periods when the emissions from the in-line adhesive

station are vented to the atmosphere as allowed by c)(2) above and the emissions from the CI station and the in-line flexo station are vented to the catalytic oxidizer.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

(2) This emissions unit shall be operated with an interlock system that prevents the operation of this emissions unit unless the catalytic oxidizer is in operation. The only exception is the in-line adhesive station which may operate independent of the catalytic oxidizer as allowed by c)(2) above.

[Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-77-07(A)(1), and 40 CFR Part 64.3]

(3) All exhaust fans associated with active stations of this emissions unit shall be in operation at all times when this emissions unit is in operation.

[Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-77-07(A)(1), and 40 CFR Part 64.3]

(4) All bypass dampers, actuator pins, and associated motors shall be in the correct position and in good operating condition at all times when this emissions unit is in operation to ensure that all captured VOC emissions are vented to the catalytic oxidizer. The only exception is the in-line adhesive station which may operate independent of the catalytic oxidizer as allowed by c)(2) above. Also, all the hooding and ductwork comprising the VOC emission capture system for this emissions unit shall be free of leaks and holes that would permit the escape of the captured VOC emissions.

[Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-77-07(A)(1), and 40 CFR Part 64.3]

Note: It is not a deviation if an incorrect position does not cause excess emissions (i.e., emissions not required to be controlled are ducted to the catalytic oxidizer, station is not in use, etc.)

(5) On an annual basis, the permittee shall inspect the electronics of the interlock system used for this emissions unit to verify the signals between the catalytic oxidizer and the emissions unit are functioning properly. The permittee shall document the results of all annual inspections. An excursion is defined as a finding that the interlock is inoperative. Any excursion shall require that the emissions unit be immediately shut down and remain shut down until the problem has been corrected.

[Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-77-07(C)(1), 40 CFR Part 64.3, 40 CFR Part 64.7(c), and 40 CFR Part 64.9(b)]

(6) Within 12 months after issuance of Permit to Install (PTI) P0108338 for each emission station of this emissions unit, the permittee shall continuously monitor an indicator of flow of the emission station's exhaust, while the emission station is in operation and exhaust is being directed to the catalytic oxidizer. This can be accomplished by either monitoring the static pressure or by a direct measurement of flow. The measurement method shall be capable of accurately measuring the desired parameter and shall be

calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee. Monitoring data shall be recorded at least four (4) times per hour by an electronic data acquisition system or chart recorder.

Whenever the monitored value for the air flow rate or rate indicator at the outlet of the emission station deviates from the value specified below for more than five (5) consecutive minutes, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation, the permittee shall take prompt corrective action to determine the cause of the deviation and to bring the operation of the capture (collection) system within the acceptable value specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the flow rate indicator value from the emission station measured both before and after the corrective action, and the names of the personnel who performed the work.

Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

An acceptable value for the indicator of flow of the emissions unit's exhaust, while the emission station of the emissions unit is in operation and exhaust is directed to the catalytic oxidizer can be no less than eighty-five percent of the average value measured during the most recent emission test that demonstrated the emissions unit was in compliance.

[Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-77-07(C)(1), 40 CFR Part 64.3, 40 CFR Part 64.7(c), and 40 CFR Part 64.9(b)]

(7) Each calendar month, during which the emissions unit is operated, the permittee shall inspect the operational condition and integrity of the following:

a. Each exhaust fan comprising the capture system. Exhaust fan observations shall include visual inspections of the fan wheel, belts, and bearings. Lubrication of bearings and replacement of parts shall occur as necessary.

b. All hooding, ductwork, and bypass dampers comprising the capture system. Hooding and ductwork observations shall include visual inspections for leaks or holes. Bypass damper observations shall include visual inspections to verify that the damper setting is in the correct position (i.e., to the catalytic oxidizer or to the atmosphere) and visual inspections of the actuator and motor to verify that the actuator pin and the motor are operating properly.

The permittee shall document the results of all monthly inspections, including any corrective actions taken.

[Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-77-07(C)(1), 40 CFR Part 64.7(c), and 40 CFR Part 64.9(b)]

(8) The permittee shall collect and record the following information each month for the coatings employed on the in-line adhesive station that are vented to the atmosphere:

a. the name and identification number of each coating and ink, as applied; and

b. the VOC content in percentage VOC by volume of each coating and ink (excluding water and exempt solvents); or

c. the VOC content in percentage VOC by volume of the volatile matter in each coating and ink; and

d. the VOC content in pound of VOC per pound of coating or ink applied; or

e. the VOC content in pound of VOC per pound of solids applied.

(If the permittee mixes complying coatings that individually comply with the VOC content limitations in b)(1)a. and b)(1)f. above, it is not necessary to record the VOC content of the resulting mixture.)

[Authority for term: OAC rule 3745-21-09(B)(3)(f), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(C)(1)]

(9) If a job specification calls for a coating to be employed on in-line adhesive station that does not comply with the requirements of b)(1)a. and b)(1)f. above, then the permittee shall maintain the following information in a log:

a. the date;

b. confirmation that the VOC emissions from the noncomplying coatings were diverted to the catalytic oxidizer; and

c. the personnel initials.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

(10) Each month the permittee shall calculate and record the VOC emissions for the previous month as well as the summation of the VOC emissions for the previous 12-month period (including emissions generated from the natural gas combustion in the ovens) and compare the calculated emission rate to the emission limitation contained in b)(1)b. above. Any credible method for performing these calculations is acceptable so long as the permittee retains records of how they were completed.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

(11) For the monitoring/record keeping requirements for the catalytic oxidizer, see 6.a)(1) through (5) in Section B: Facility-Wide Terms and Conditions.

(12) The CAM plan for this emissions unit has been developed for VOC emissions. The CAM performance indicators for the catalytic oxidizer controlling this emissions unit include the average temperature of the exhaust gases immediately before the catalyst bed, the average temperature difference across the catalyst bed, an indicator of flow of the emission station's exhaust, the catalyst activity testing, and an interlock system. When the performance indicators are operating outside the indicator ranges, the permittee shall take corrective action to restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions and complying with the reporting requirements specified in e) below. The emissions unit and control equipment shall be run in accordance with the approved CAM Plan, or any approved revision of the Plan. In addition to monitoring the temperature of the exhaust gases immediately before the catalyst bed and an indicator of flow of the emission station's exhaust of this emissions unit, and testing of the catalyst activity, and operating an interlock system, the permittee also has an inspection/preventative maintenance program for the catalytic oxidizer. Based on the results of the inspection/preventative maintenance program, repairs to the catalytic oxidizer shall be made as needed. If the current CAM indicators and/or the catalytic oxidizer system inspection/preventative maintenance program are considered inadequate, the permittee will develop a Quality Improvement Plan.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Parts 64.6(d) and 64.7]

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports that identify any time periods when the emissions unit was in operation and the emissions from the emissions unit were not vented to the catalytic oxidizer except for time periods when the emissions from the in-line adhesive station are vented to the atmosphere as allowed by c)(2) above and the emissions from the CI station and the in-line flexo station are vented to the catalytic oxidizer. Each report shall be submitted within 30 days after the deviation occurs.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

(2) The permittee shall submit quarterly (excursion) deviation reports that identify the following:

a. each time the interlock system does not stop the operation of this emissions unit when the catalytic oxidizer is not in operation and its use is necessary to be in compliance;

b. each time any bypass dampers, actuator pins, and/or associated motors are not in the correct position and in good operating condition and/or any of the hooding or ductwork comprising the VOC emission capture system contains leaks or holes that would permit the escape of the captured VOC emissions;

Note: It is not a deviation and does not need reported if an incorrect position does not cause excess emissions (i.e., emissions not required to be controlled are ducted to the catalytic oxidizer, station is not in use, etc.)

c. each time the findings of any inspection that determined the integrity of any ventilation fan has comprised the capture system. These reports shall include information required by 40 CFR Part 64.9(a);

d. all exceedances of the rolling, 12-month emission limitation for VOC;

e. each period of time, during operation of this emission unit, when the air flow rate at the outlet of this emissions unit was less than the acceptable value; and

f. each incident of deviation described in (e) where a prompt investigation was not conducted; where prompt corrective action was determined to be necessary and was not taken; or where proper records were not maintained for the investigation and/or the corrective action.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-77-07(C)(1), and 40 CFR Part 64.9(a)]

(3) The permittee shall submit annual reports that specify the results of each annual inspection of the electronics of the ventilation fan interlock systems and the catalytic oxidizer interlock system, based on the records maintained pursuant to d)(5) above. These reports shall be submitted within 45 days after each inspection is performed.

[Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-77-07(C)(1), and 40 CFR Part 64.9(a)]

(4) For the reporting requirements for the catalytic oxidizer, see 6.b)(1) through (4) in Section B: Facility-Wide Terms and Conditions.

f) Testing Requirements

(1) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. Within 12 months after issuance of the PTI P0108338, if the data from the August 19, 2008 stack test for this emissions unit is not sufficient to establish the operating parameter for demonstrating compliance with the capture efficiency limitation, then emission testing shall have been conducted to demonstrate compliance with the capture efficiency limitation and to establish the appropriate operating parameter to ensure the capture efficiency in b)(1) is maintained unless the specific station to be tested is not being operated (see b. below).

b. Any testing required by a. above may be delayed for stations that are not operated during the established testing time frame. In this case capture efficiency testing shall be conducted to demonstrate compliance with the capture

efficiency limitation and to establish the appropriate operating parameter to ensure the capture efficiency in b)(1) within 6 months of the station again becoming operational.

c. The emission testing to demonstrate compliance with the 90 percent, by weight, capture efficiency limitation for VOC was conducted on August 19, 2008.

d. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

e. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

f. During each capture efficiency test run, the permittee shall measure the air flow rate or rate indicator at the outlet of the emission stations for this emissions unit.

[Authority for term: OAC rule 3745-21-10(C), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(C)(1)]

(2) Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

(3) Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

(4) A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s).The permittee may request additional time for the submittal of the written report,

where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

(5) For additional testing requirements for the catalytic oxidizer, see 6.c)(1) through 6.c)(5) in Section B: Facility-Wide Terms and Conditions.

(6) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

The emissions of VOC from this emissions unit which includes the CI station, in-line adhesive station, and in-line flexo station shall not exceed 16.22 pounds of per hour.

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitation above shall be demonstrated by multiplying the maximum line speed in feet per minute by 60 minutes per hour times the maximum print/coat width in feet times the maximum pounds of VOC per ream times one ream per 3000 square feet times (1 - (0.855)*).

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation above in accordance with Methods 1-4 and 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

*Overall control efficiency is based on the capture efficiency requirement of 90%, by weight and the control (destruction) efficiency requirement of 95%, by weight.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

The emissions of VOC from this emissions unit which includes the CI station, the in-line adhesive station, and the in-line flexo station shall not exceed 22.0 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation above shall be demonstrated through the record keeping requirements established in Section B – Facility-Wide Terms and Conditions and d)(10) above.

[Authority for term: OAC rule 3745-31-05(D) and OAC rule 3745-77-07(C)(1)]

c. Emission Limitations:

The VOC content of the coatings and inks shall not exceed forty percent VOC by volume of the coating and ink, excluding water and exempt solvents or twenty-five percent VOC by volume of the volatile matter in the coating and ink.

The VOC content of the coatings and inks employed shall not exceed 0.8 pound of VOC per pound of solids applied or 0.16 pound of VOC per pound of coating or ink applied.

Applicable Compliance Method:

Compliance with the allowable VOC emission limitations above shall be demonstrated through the record keeping requirements established in d)(8) above.

OAC rule 3745-21-10(B). USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

[Authority for term: OAC rule 3745-21-10(B), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(C)(1)]

d. Emission Limitation:

a control (destruction) efficiency which is at least 95 percent, by weight, for VOC

Applicable Compliance Method:

Compliance with the allowable control (destruction) efficiency for VOC above shall be demonstrated based upon the results of emission testing conducted in accordance with the procedures and test methods as outlined in 6.c)(2) through 6.c)(5) in Section B: Facility-Wide Terms and Conditions.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

e. Emission Limitation:

a capture efficiency which is at least 90 percent, by weight, for VOC

Applicable Compliance Method:

Compliance with the allowable capture efficiency for VOC above shall be demonstrated based upon the results of emission testing conducted in accordance with the procedures and test methods as outlined in f)(1) above.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

f. Emission Limitation:

0.28 pound of NO_x per hour

Applicable Compliance Method:

Compliance with the hourly NO_x emission limitation aboveshall be demonstrated by multiplying the NO_x emission factor of 100 pounds of NO_x emissions per million cubic feet of natural gas fired* by the maximum hourly natural gas usage.

If required, the permittee shall demonstrate compliance with the hourly allowable NOx emission limitation above in accordance with Methods 1-4 and 7 of 40 CFR Part 60, Appendix A.

*The NO_x emission factor is from AP-42, 5th edition, Table 1.4-1, dated 7/98.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

g. Emission Limitation:

0.23 pound of CO per hour

Applicable Compliance Method:

Compliance with the hourly CO emission limitation aboveshall be demonstrated by multiplying the CO emission factor of 84 pounds of CO emissions per million cubic feet of natural gas fired* by the maximum hourly natural gas usage.

If required, the permittee shall demonstrate compliance with the hourly allowable CO emission limitation above in accordance with Methods 1-4 and 10 of 40 CFR Part 60, Appendix A.

*The CO emission factor is from AP-42, 5th edition, Table 1.4-1, dated 7/98.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

h. Emission Limitation:

0.02 pound of PE per hour

Applicable Compliance Method:

Compliance with the hourly PE limitationabove shall be demonstrated by multiplying the PE factor of 7.6 pounds of PE per million cubic feet of natural gas fired* by the maximum hourly natural gas usage.

If required, the permittee shall demonstrate compliance with the hourly allowable PE emission limitation above in accordance with Methods 1-5 of 40 CFR Part 60, Appendix A.

*The PE factor is from AP-42, 5th edition, Table 1.4-2, dated 7/98.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

i. Emission Limitation:

0.002 pound of SO_2 per hour

Applicable Compliance Method:

Compliance with the hourly SO_2 emission limitation aboveshall be demonstrated by multiplying the SO_2 emission factor of 0.6 pound of SO_2 emissions per million cubic feet of natural gas fired* by the maximum hourly natural gas usage.

If required, the permittee shall demonstrate compliance with the hourly allowable SO2 emission limitation above in accordance with Methods 1-4 and 6 of 40 CFR Part 60, Appendix A.

*The SO_2 emission factor is from AP-42, 5th edition, Table 1.4-2, dated 7/98.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

j. Emission Limitations:

1.20 tons of NO_x per year

1.01 tons of CO per year

0.09 ton of PE per year

0.01 ton of SO_2 per year

Applicable Compliance Method:

Compliance with the annual allowable emission limitations above shall be demonstrated by multiplying the hourly allowable emission limitation by 8760 hours per year, and then dividing by 2000 pounds per ton. Therefore, as long as compliance with the hourly allowable emission limitations is maintained, compliance with the annual allowable emission limitations shall be assumed.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) Modeling to demonstrate compliance with, the “Toxic Air Contaminant Statute”, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit’s 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 PTI 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 PTI.

2. P010, BASF2

Operations, Property and/or Equipment Description:

Photopolymer plate making equipment consisting of (1) plate exposure unit, (2) digital imaging units, (1) wash-out unit, (2) plate dryers, and (2) anti-tack post exposure units - BASF2.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) g)(1).

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)	The emissions of volatile organic compounds (VOC) shall not exceed 9.9 tons per year, based upon a rolling, 12-month summation of the monthly emissions.
b.	OAC rule 3745-31-05(D) (synthetic minor to avoid MACT applicability under 40 CFR Part 63, Subpart KK)	See 2, 3, 4, and 5 of Section B - Facility-Wide Terms and Conditions.
c.	OAC rule 3745-21-07(M)(4)	The emissions of organic compounds (OC) shall be reduced by at least 85 percent, by weight. 90 percent or more of the carbon in the organic material being incinerated shall be oxidized to carbon dioxide.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The VOC emissions from the plate wash-out unit/plate dryers/anti-tack post exposure units shall be vented to the catalytic oxidizer when the emissions unit is in operation.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain records documenting any time periods when the emissions unit was in operation and the emissions from the plate wash-out unit/plate dryers/anti-tack post exposure units were not vented to the catalytic oxidizer.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

(2) The permittee shall maintain the following information for this emissions unit on a monthly basis:

a. The total pounds of film cleaning materials used (from 3.b)(1) in Section B: Facility-Wide Terms and Conditions);

b. The total pounds of plate wash materials used (from 3.b)(2) in Section B: Facility-Wide Terms and Conditions);

c. The VOC content of each film cleaning material and plate wash material used, in percent by weight;

d. The total pounds of plate wash materials retained in still bottoms as part of the reclaim process (from 3.b)(4) in Section B: Facility-Wide Terms and Conditions); and

e. The VOC content of the plate wash material retained in still bottoms as part of the reclaim process, in percent by weight.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

(3) Each month the permittee shall calculate and record the VOC emissions for the previous month as well as the summation of the VOC emissions for the previous 12-month period and compare the calculated emission rate to the emission limitation contained in b)(1)a. above. Any credible method for performing these calculations is acceptable so long as the permittee retains records of how they were completed.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

(4) For the monitoring/record keeping requirements for the catalytic oxidizer, see 6.a)(1) through (5) in Section B: Facility-Wide Terms and Conditions.

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports that identify any time periods when the emissions unit was in operation and the emissions from the plate wash-out unit/plate dryers/anti-tack post exposure units were not vented to the catalytic oxidizer. Each report shall be submitted within 30 days after the deviation occurs.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

(2) The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for VOC. The quarterly

deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

(3) For the reporting requirements for the catalytic oxidizer, see 6.b)(1) through (4) in Section B: Facility-Wide Terms and Conditions.

f) Testing Requirements

(1) For additional testing requirements for the catalytic oxidizer, see 6.c)(1) through 6.c)(5) in Section B: Facility-Wide Terms and Conditions.

(2) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

The emissions of OC shall be reduced by at least 85 percent, by weight.

Applicable Compliance Method:

If required, compliance with the allowable overall control efficiency limitation above shall be demonstrated based upon destruction testing using the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA (The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.) and capture testing using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable.)

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

90 percent or more of the carbon in the organic material being incinerated shall be oxidized to carbon dioxide

Applicable Compliance Method:

Compliance with the allowable control (destruction) efficiency limitation above shall be demonstrated based upon the results of emission testing conducted in accordance with the procedures and test methods as outlined in 6.c)(2) through 6.c)(5) in Section B: Facility-Wide Terms and Conditions.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

c. Emission Limitation:

The emissions of VOC shall not exceed 9.9 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance with the annual allowable VOC limitation above shall be demonstrated based upon the record keeping requirements established in d)(3) and d)(4) above.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) Modeling to demonstrate compliance with, the “Toxic Air Contaminant Statute”, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit’s 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 PTI 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 PTI.

3. Emissions Unit Group -Group 1: K003,K008,K016,

EU ID	Operations, Property and/or Equipment Description
K003	flexographic printing press with in-line gravure station - W & H 1
K008	flexographic printing press with in-line lamination and in-line gravure station - W & H 2
K016	flexographic printing press with in-line flexo station - PC VISION

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) g)(1).

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)	The emissions of volatile organic compounds (VOC) from emissions unit K008 which includes the central impression (CI) station, in-line lamination, and in-line gravure station shall not exceed 85.0 pounds per hour. (See b)(2)a. below.) The emissions of VOC from emissions unit K016 which includes the CI station and in-line flexo station shall not exceed 34.0 pounds per hour. (See b)(2)a. below.) The emissions of VOC from emissions unit K008 which includes the CI station, in-line lamination, and in-line gravure station shall not exceed 109 tons per year. The emissions of VOC from emissions unit K016 which includes the CI station and in-line flexo station shall not exceed 109 tons per year. For emissions unit K008, the CI station,

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		in-line lamination, and in-line gravure station shall be equipped with a capture system and associated control system which are designed and operated to achieve a control (destruction) efficiency which is at least 90 percent, by weight, and a capture efficiency which is at least 78 percent, by weight. For emissions unit K016, the CI station and in-line flexo station shall be equipped with a capture system and associated control system which are designed and operated to achieve a control (destruction) efficiency which is at least 90 percent, by weight, and a capture efficiency which is at least 78 percent, by weight. For emissions unit K003, the emission control requirements established pursuant to this rule are equivalent to the emission control requirements of OAC rule 3745-21-09(Y)(1)(b). The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(D) (synthetic minor to avoid PSD permitting and MACT applicability under 40 CFR Part 63, Subpart KK)	See 2, 3, 4, and 5 of Section B - Facility-Wide Terms and Conditions.
c.	OAC rule 3745-21-09(Y)(1)(b)	For emissions unit K003, the CI station and in-line gravure station shall be equipped with a capture system and associated control system which are designed and operated to achieve a control (destruction) efficiency which is at least 90 percent, by weight, and a capture efficiency which is at least 65 percent, by weight. For emissions units K008 and K016, the emission control requirements based on this applicable rule are less stringent than

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		or equivalent to the emission control requirements established pursuant to OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-21-09(Y)(4)(a)(i)(*a*)	Emissions unit K003 shall employ a control system to reduce VOC emissions by 65 percent overall control. For emissions unit K008, the emission control requirement based on this applicable rule is less stringent than the emission control requirements established pursuant to OAC rule 3745-31-05(A)(3).
e.	OAC rule 3745-21-09(Y)(4)(a)(i)(*c*)	Emissions unit K016 shall employ a control system to reduce VOC emissions by 75 percent overall control.
f.	OAC rule 3745-21-09(Y)(4)(b)	VOC emissions from cleanup materials shall be minimized by keeping cleaning materials and used shop towels in closed containers and convey cleaning materials from one location to another in closed containers or pipes.
g.	40 CFR Part 64	See d)(2) through d)(7), d)(10), e)(2), and e)(3) below and 6.a)(1) through 6.a)(5) and 6.b)(1) through 6.b)(4) of Section B - Facility-Wide Terms and Conditions.

(2) Additional Terms and Conditions

a. The hourly VOC emission limitations are based on the emissions units' potential to emit. Therefore, no record keeping or reporting is required to demonstrate compliance with these emission limitations.

c) Operational Restrictions

(1) The VOC emissions from the CI station and in-line gravure station shall be vented to the catalytic oxidizer when emissions unit K003 is in operation.

[Authority for term: OAC rule 3745-77-07(A)(1)].

(2) The VOC emissions from the CI station, in-line lamination, and in-line gravure station shall be vented to the catalytic oxidizer when emissions unit K008 is in operation.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]

(3) The VOC emissions from the CI station and in-line flexo station shall be vented to the catalytic oxidizer when emissions unit K016 is in operation.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain records documenting any time periods when any of the emissions units listed above was in operation and the emissions from the emissions unit were not vented to the catalytic oxidizer.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

(2) The emissions units listed above shall be operated with an interlock system that prevents the operation of the emissions unit unless the catalytic oxidizer is in operation.

[Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-77-07(A)(1), and 40 CFR Part 64.3]

(3) All exhaust fans associated with active stations of the emissions units listed above shall be in operation at all times when the emissions units listed above are in operation.

[Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-77-07(A)(1), and 40 CFR Part 64.3]

(4) All bypass dampers, actuator pins, and associated motors shall be in the correct position and in good operating condition at all times when the emissions units listed above are in operation to ensure that all captured VOC emissions are vented to the catalytic oxidizer. Also, all the hooding and ductwork comprising the VOC emission capture system for the emissions units listed above shall be free of leaks and holes that would permit the escape of the captured VOC emissions.

Note: It is not a deviation if an incorrect position does not cause excess emissions (i.e., station is not in use, etc.)

[Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-77-07(A)(1), and 40 CFR Part 64.3]

(5) On an annual basis, the permittee shall inspect the electronics of the interlock system used for the emissions units listed above to verify the signals between the catalytic oxidizer and the emissions unit are functioning properly. The permittee shall document the results of all annual inspections. An excursion is defined as a finding that the interlock is inoperative. Any excursion shall require that the emissions unit be immediately shut down and remain shut down until the problem has been corrected.

[Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-77-07(C)(1), 40 CFR Part 64.3, 40 CFR Part 64.7(c), and 40 CFR Part 64.9(b)]

(6) Within 12 months after issuance of Permit to Install (PTI) P0108338 for each emission station of the emissions units listed above, the permittee shall continuously monitor an indicator of flow of the emission station's exhaust, while the emission station is in

operation and exhaust is being directed to the catalytic oxidizer. This can be accomplished by either monitoring the static pressure or by a direct measurement of flow. The measurement method shall be capable of accurately measuring the desired parameter and shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee. Monitoring data shall be recorded at least four (4) times per hour by an electronic data acquisition system or chart recorder.

Whenever the monitored value for the air flow rate or rate indicator at the outlet of the emission station deviates from the value specified below for more than five (5) consecutive minutes, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation, the permittee shall take prompt corrective action to determine the cause of the deviation and to bring the operation of the capture (collection) system within the acceptable value specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the flow rate indicator value from the emission station measured both before and after the corrective action, and the names of the personnel who performed the work.

Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

An acceptable value for the indicator of flow of the emissions unit's exhaust, while the emission station of the emissions unit is in operation and exhaust is directed to the catalytic oxidizer can be no less than eighty-five percent of the average value measured during the most recent emission test that demonstrated the emissions unit was in compliance.

[Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-77-07(C)(1), 40 CFR Part 64.3, 40 CFR Part 64.7(c), and 40 CFR Part 64.9(b)]

(7) Each calendar month, during which the emissions units listed above are operated, the permittee shall inspect the operational condition and integrity of the following:

a. Each exhaust fan comprising the capture system. Exhaust fan observations shall include visual inspections of the fan wheel, belts, and bearings. Lubrication of bearings and replacement of parts shall occur as necessary.

b. All hooding, ductwork, and bypass dampers comprising the capture system. Hooding and ductwork observations shall include visual inspections for leaks or holes. Bypass damper observations shall include visual inspections to verify that the damper setting is in the correct position (i.e., to the catalytic oxidizer or to the

atmosphere) and visual inspections of the actuator and motor to verify that the actuator pin and the motor are operating properly.

The permittee shall document the results of all monthly inspections, including any corrective actions taken.

[Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-77-07(C)(1), 40 CFR Part 64.7(c), and 40 CFR Part 64.9(b)]

(8) Each month the permittee shall calculate and record the VOC emissions for the previous month for emissions units K008 and K016 (including emissions generated from the natural gas combustion in the ovens) and at the beginning of each year compare the calculated emission rate to the emission limitation contained in b)(1)a. above. Any credible method for performing these calculations is acceptable so long as the permittee retains records of how they were completed.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

(9) For the monitoring/record keeping requirements for the catalytic oxidizer, see 6.a)(1) through (5) in Section B: Facility-Wide Terms and Conditions.

(10) The CAM plan for the emissions units listed above has been developed for VOC emissions. The CAM performance indicators for the catalytic oxidizer controlling the emissions unit listed above include the average temperature of the exhaust gases immediately before the catalyst bed, the average temperature difference across the catalyst bed, an indicator of flow of the emission stations' exhaust, the catalyst activity testing, and an interlock system. When the performance indicators are operating outside the indicator ranges, the permittee shall take corrective action to restore operation of the emissions unit listed above and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions and complying with the reporting requirements specified in e) below. The emissions unit listed above and control equipment shall be run in accordance with the approved CAM Plan, or any approved revision of the Plan. In addition to monitoring the temperature of the exhaust gases immediately before the catalyst bed and an indicator of flow of the emission stations' exhaust of the emissions unit listed above, and testing of the catalyst activity, and operating an interlock system, the permittee also has an inspection/preventative maintenance program for the catalytic oxidizer. Based on the results of the inspection/preventative maintenance program, repairs to the catalytic oxidizer shall be made as needed. If the current CAM indicators and/or the catalytic oxidizer system inspection/preventative maintenance program are considered inadequate, the permittee will develop a Quality Improvement Plan.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Parts 64.6(d) and 64.7]

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports that identify any time periods when either of the emissions units listed above was in operation and the emissions from the emissions unit(s) were not vented to the catalytic oxidizer. Each report shall be submitted within 30 days after the deviation occurs.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

(2) The permittee shall submit quarterly (excursion) deviation reports that identify the following:

a. each time the interlock system does not stop the operation of the emissions units listed above when the catalytic oxidizer is not in operation and its use is necessary to be in compliance;

b. each time any bypass dampers, actuator pins, and/or associated motors are not in the correct position and in good operating condition and/or any of the hooding or ductwork comprising the VOC emission capture system contains leaks or holes that would permit the escape of the captured VOC emissions;

Note: It is not a deviation and does not need reported if an incorrect position does not cause excess emissions (i.e., station is not in use, etc.)

c. each time the findings of any inspection that determined the integrity of any ventilation fan has compromised the capture system. These reports shall include information required by 40 CFR Part 64.9(a);

d. each period of time, during operation of the emissions units listed above, when the air flow rate at the outlet of either emissions units was less than the acceptable value; and

e. each incident of deviation described in (d) where a prompt investigation was not conducted; where prompt corrective action was determined to be necessary and was not taken; or where proper records were not maintained for the investigation and/or the corrective action.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-77-07(C)(1), and 40 CFR Part 64.9(a)]

(3) The permittee shall submit annual reports that specify the results of each annual inspection of the electronics of the ventilation fan interlock systems and the catalytic oxidizer interlock system, based on the records maintained pursuant to d)(5) above. These reports shall be submitted within 45 days after each inspection is performed.

[Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-77-07(C)(1), and 40 CFR Part 64.9(a)]

(4) For the reporting requirements for the catalytic oxidizer, see 6.b)(1) through (4) in Section B: Facility-Wide Terms and Conditions.

f) Testing Requirements

(1) The permittee shall conduct, or have conducted, emission testing for the emissions units listed above in accordance with the following requirements:

a. Within 12 months after issuance of PTI P0108338, if the data from the 1999 stack testing is not sufficient to establish the operating parameter for demonstrating compliance with the capture efficiency limitation, then emission testing shall have been conducted to demonstrate compliance with the capture efficiency limitation and to establish the appropriate operating parameter to ensure the capture efficiency in b)(1) above is maintained unless the specific station to be tested is not being operated (see b. below).

b. Any testing required by a. above may be delayed for stations that are not operated during the established testing time frame. In this case capture efficiency testing shall be conducted to demonstrate compliance with the capture efficiency limitation and to establish the appropriate operating parameter to ensure the capture efficiency in b)(1) above within 6 months of the station again becoming operational.

c. The emission testing to demonstrate compliance with the 78 percent, by weight, capture efficiency limitation for VOC was conducted on January 29, 1999 for emission unit K003 (WH-1) which was an identical emissions unit to K008 and on January 31 and February 1, 1999 for emissions unit K016.

d. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

e. The test(s) shall be conducted while the emissions units are operating at or near their maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

f. During each capture efficiency test run, the permittee shall measure the air flow rate or rate indicator at the outlet of the emission stations for the emissions units listed above.

[Authority for term: OAC rule 3745-21-10(C), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(C)(1)]

(2) Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air

agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions units listed above operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

(3) Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions units listed above and the testing procedures provide a valid characterization of the emissions from the emissions units listed above and/or the performance of the control equipment.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

(4) A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

(5) For additional testing requirements for the catalytic oxidizer, see 6.c)(1) through 6.c)(5) in Section B: Facility-Wide Terms and Conditions.

(6) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations:

The emissions of VOC from emissions unit K008 which includes the CI station, in-line lamination, and in-line gravure station shall not exceed 85.0 pounds per hour.

The emissions of VOC from emissions unit K016 which includes the CI station and in-line flexo station shall not exceed 34.0 pounds per hour.

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitations above shall be determined by multiplying the maximum line speed in feet per minute by 60 minutes per hour times the maximum print/coat width in feet times the maximum pounds of VOC per ream times one ream per 3000 square feet times (1-X*).

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitations above in accordance with Methods 1-4 and 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

*"X" is the overall control efficiency for the emissions unit (the capture efficiency times the control (destruction) efficiency) required by the most stringent regulation.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

b. Emission Limitations:

The emissions of VOC from emissions unit K008 which includes the CI station, in-line lamination, and in-line gravure station shall not exceed 109 tons per year.

The emissions of VOC from emissions unit K016 which includes the CI station and in-line flexo station shall not exceed 109 tons per year.

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitations above shall be demonstrated through the record keeping requirements established in Section B – Facility-Wide Terms and Conditions and d)(8) above.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

c. Emission Limitations:

For emissions unit K003, the CI station and in-line gravure station shall be equipped with a capture system and associated control system which are designed and operated to achieve a control (destruction) efficiency which is at least 90 percent, by weight, and a capture efficiency which is at least 65 percent, by weight.

For emissions unit K008, the CI station, in-line lamination, and in-line gravure station shall be equipped with a capture system and associated control system which are designed and operated to achieve a control (destruction) efficiency which is at least 90 percent, by weight, and a capture efficiency which is at least 78 percent, by weight.

For emissions unit K016, the CI station and in-line flexo station shall be equipped with a capture system and associated control system which are designed and operated to achieve a control (destruction) efficiency which is at least 90 percent, by weight, and a capture efficiency which is at least 78 percent, by weight.

Emissions unit K003 shall employ a control system to reduce VOC emissions by 65 percent overall control.

Emissions unit K016 shall employ a control system to reduce VOC emissions by 75 percent overall control.

Applicable Compliance Method:

Compliance with the allowable capture and control (destruction) efficiency and the overall control limitations above shall be demonstrated based upon the results of emission testing conducted in accordance with the procedures and test methods as outlined in 6.c)(2) through 6.c)(5) in Section B: Facility-Wide Terms and Conditions and f)(1) above.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's 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 PTI 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 PTI.

4. Emissions Unit Group -Group 2: K010,K020,

EU ID	Operations, Property and/or Equipment Description
K010	flexographic printing press with in-line lamination and in-line print station - W & H 3
K020	flexographic printing press with in-line lamination and in-line flexo station - W & H 5

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) g)(1).

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)	The emissions of volatile organic compounds (VOC) from emissions unit K010 which includes the central impression (CI) station, in-line lamination, and in-line print station shall not exceed 222.0 pounds per hour. (See b)(2)a. below.) The emissions of VOC from emissions unit K020 which includes the CI station, in-line lamination, and in-line flexo station shall not exceed 124.0 pounds per hour. (See b)(2)a. below.) The emissions of VOC from emissions unit K010 which includes the CI station, in-line lamination, and in-line print station shall not exceed 109 tons per year. The emissions of VOC from emissions unit K020 which includes the CI station, in-line lamination, and in-line flexo station shall not exceed 109 tons per year. For emissions unit K010: the CI station and in-line print station shall be equipped with a capture system and associated

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		control system which are designed and operated to achieve a control (destruction) efficiency which is at least 90 percent, by weight, and a capture efficiency which is at least 78 percent, by weight, for VOC. For emissions unit K010: the in-line lamination station shall be equipped with a capture system and associated control system which are designed and operated to achieve a control (destruction) efficiency which is at least 90 percent, by weight, and a capture efficiency which is at least 78 percent, by weight, for VOC, or the VOC content of the coatings and inks employed shall not exceed the following: i. forty percent VOC by volume of the coating and ink, excluding water and exempt solvents; or ii. twenty-five percent VOC by volume of the volatile matter in the coating and ink. For emissions unit K020: The CI station and in-line flexo station shall be equipped with a capture system and associated control system which are designed and operated to achieve a control (destruction) efficiency which is at least 90 percent, by weight, and a capture efficiency which is at least 90 percent, by weight, for VOC. For emissions unit K020: The in-line lamination station shall be equipped with a capture system and associated control system which are designed and operated to achieve a control (destruction) efficiency which is at least 90 percent, by weight, and a capture efficiency which is at least 90 percent, by weight, for VOC, or

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		the VOC content of the coatings and inks employed shall not exceed the following: i. forty percent VOC by volume of the coating and ink, excluding water and exempt solvents; or ii. twenty-five percent VOC by volume of the volatile matter in the coating and ink. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(D) (synthetic minor to avoid PSD permitting and MACT applicability under 40 CFR Part 63, Subpart KK)	See 2, 3, 4, and 5 of Section B - Facility-Wide Terms and Conditions.
c.	OAC rule 3745-21-09(Y)(1)(a)	The emission limitation specified by this rule is equivalent to the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-21-09(Y)(1)(b)	The emission control requirement based on this applicable rule is less stringent than or equivalent to the emission control requirements established pursuant to OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-21-09(Y)(4)(a)(i)(*a*)	For emissions unit K010, the emission control requirement based on this applicable rule is less stringent than the emission control requirement established pursuant to OAC rule 3745-31-05(A)(3).
e.	OAC rule 3745-21-09(Y)(4)(a)(i)(*c*)	For emissions unit K020, the emission control requirement based on this applicable rule is less stringent than the emission control requirements established pursuant to OAC rule 3745-31-05(A)(3).
f.	OAC rule 3745-21-09(Y)(4)(a)(ii)	When the emissions from the in-line lamination stations on emissions units K010 and K020 are venting to the atmosphere: The VOC content of the coatings and inks employed shall not exceed 0.8 pound of VOC per pound of solids applied or 0.16 pound of VOC per pound of coating or ink applied.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		The VOC content limits specified above may be met by averaging the VOC content of materials used on a single press, within a single printing line.
g.	OAC rule 3745-21-09(Y)(4)(b)	VOC emissions from cleanup materials shall be minimized by keeping cleaning materials and used shop towels in closed containers and convey cleaning materials from one location to another in closed containers or pipes.
h.	40 CFR Part 64	See d)(2) through d)(7), d)(12), e)(2), and e)(3) below and 6.a)(1) through 6.a)(5) and 6.b)(1) through 6.b)(4) of Section B - Facility-Wide Terms and Conditions.

(2) Additional Terms and Conditions

a. The hourly VOC emission limitations are based on the emissions units' potential to emit. Therefore, no record keeping or reporting is required to demonstrate compliance with these emission limitations.

c) Operational Restrictions

(1) For emissions unit K010, the VOC emissions from the CI station and the in-line print station shall be vented to the catalytic oxidizer when the emissions unit is in operation.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]

(2) For emissions unit K020, the VOC emissions from the CI station and the in-line flexo station shall be vented to the catalytic oxidizer when the emissions unit is in operation.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]

(3) For emissions units K010 and K020: When employing a coating on the in-line lamination station that meets the requirements of OAC rules 3745-21-09(Y)(1)(a) and (Y)(4)(a)(ii), the VOC emissions from the in-line lamination station may be vented to the atmosphere.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]

(4) For emissions units K010 and K020: When employing a coating on the in-line lamination station that does not meet the requirements of OAC rules 3745-21-09(Y)(1)(a) and (Y)(4)(a)(ii), the VOC emissions from the in-line lamination station shall be vented to the catalytic oxidizer.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain records documenting any time periods when either of the emissions units listed above was in operation and the emissions from the emissions unit were not vented to the catalytic oxidizer except for time periods when the emissions from the in-line lamination station are vented to the atmosphere as allowed c)(3) above and the emissions from the CI station and in-line print station for emissions unit K010 are vented to the catalytic oxidizer and the emissions from the CI station and the in-line flexo station for emissions unit K020 are vented to the catalytic oxidizer.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

(2) The emissions units listed above shall be operated with an interlock system that prevents the operation of the emissions unit unless the catalytic oxidizer is in operation. The only exception is the in-line lamination stations which may operate independent of the catalytic oxidizer as allowed by c)(3) above.

[Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-77-07(A)(1), and 40 CFR Part 64.3]

(3) All exhaust fans associated with active stations of the emissions units listed above shall be in operation at all times when the emissions units listed above are in operation.

[Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-77-07(A)(1), and 40 CFR Part 64.3]

(4) All bypass dampers, actuator pins, and associated motors shall be in the correct position and in good operating condition at all times when the emissions units listed above are in operation to ensure that all captured VOC emissions are vented to the catalytic oxidizer. The only exception is the in-line lamination stations which may operate independent of the catalytic oxidizer as allowed by c)(3) above. Also, all the hooding and ductwork comprising the VOC emission capture system for the emissions units listed above shall be free of leaks and holes that would permit the escape of the captured VOC emissions.

Note: It is not a deviation if an incorrect position does not cause excess emissions (i.e., emissions not required to be controlled are ducted to the catalytic oxidizer, station is not in use, etc.)

[Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-77-07(A)(1), and 40 CFR Part 64.3]

(5) On an annual basis, the permittee shall inspect the electronics of the interlock system used for the emissions units listed above to verify the signals between the catalytic oxidizer and the emissions unit are functioning properly. The permittee shall document the results of all annual inspections. An excursion is defined as a finding that the interlock is inoperative. Any excursion shall require that the emissions unit be immediately shut down and remain shut down until the problem has been corrected.

[Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-77-07(C)(1), 40 CFR Part 64.3, 40 CFR Part 64.7(c), and 40 CFR Part 64.9(b)]

(6) Within 12 months after issuance of Permit to Install (PTI) P0108338 for each emission station of the emissions units listed above, the permittee shall continuously monitor an indicator of flow of the emission station's exhaust, while the emission station is in operation and exhaust is being directed to the catalytic oxidizer. This can be accomplished by either monitoring the static pressure or by a direct measurement of flow. The measurement method shall be capable of accurately measuring the desired parameter and shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, including any modifications deemed necessary by the permittee. Monitoring data shall be recorded at least four (4) times per hour by an electronic data acquisition system or chart recorder.

Whenever the monitored value for the air flow rate or rate indicator at the outlet of the emission station deviates from the value specified below for more than five (5) consecutive minutes, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation, the permittee shall take prompt corrective action to determine the cause of the deviation and to bring the operation of the capture (collection) system within the acceptable value specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the flow rate indicator value from the emission station measured both before and after the corrective action, and the names of the personnel who performed the work.

Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

An acceptable value for the indicator of flow of the emissions unit's exhaust, while the emission station of the emissions unit is in operation and exhaust is directed to the catalytic oxidizer can be no less than eighty-five percent of the average value measured during the most recent emission test that demonstrated the emissions unit was in compliance.

[Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-77-07(C)(1), 40 CFR Part 64.3, 40 CFR Part 64.7(c), and 40 CFR Part 64.9(b)]

(7) Each calendar month, during which the emissions units listed above are operated, the permittee shall inspect the operational condition and integrity of the following:

a. Each exhaust fan comprising the capture system. Exhaust fan observations shall include visual inspections of the fan wheel, belts, and bearings. Lubrication of bearings and replacement of parts shall occur as necessary.

b. All hooding, ductwork, and bypass dampers comprising the capture system. Hooding and ductwork observations shall include visual inspections for leaks or holes. Bypass damper observations shall include visual inspections to verify that the damper setting is in the correct position (i.e., to the catalytic oxidizer or to atmosphere) and visual inspections of the actuator and motor to verify that the actuator pin and the motor are operating properly.

The permittee shall document the results of all monthly inspections, including any corrective actions taken.

[Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-77-07(C)(1), 40 CFR Part 64.7(c), and 40 CFR Part 64.9(b)]

(8) The permittee shall collect and record the following information each month for the coatings employed on the in-line lamination stations that are vented to the atmosphere:

a. the name and identification number of each coating and ink, as applied; and

b. the VOC content in percentage VOC by volume of each coating and ink (excluding water and exempt solvents); or

c. the VOC content in percentage VOC by volume of the volatile matter in each coating and ink; and

d. the VOC content in pound of VOC per pound of coating or ink applied; or

e. the VOC content in pound of VOC per pound of solids applied.

(If the permittee mixes complying coatings that individually comply with the VOC content limitations in b)(1)a. and b)(1)f. above, it is not necessary to record the VOC content of the resulting mixture.)

[Authority for term: OAC rule 3745-21-09(B)(3)(f), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(C)(1)]

(9) If a job specification calls for a coating to be employed on either in-line lamination station that does not comply with the requirements of b)(1)a. and b)(1)f. above, then the permittee shall maintain the following information in a log:

a. the date;

b. confirmation that the VOC emissions from the noncomplying coatings were diverted to the catalytic oxidizer; and

c. the personnel initials.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

(10) Each month the permittee shall calculate and record the VOC emissions for the previous month for each emissions unit listed above (including emissions generated from the natural gas combustion in the ovens) and at the beginning of each year compare the

calculated emission rate to the emission limitation contained in b)(1)a. above. Any credible method for performing these calculations is acceptable so long as the permittee retains records of how they were completed.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

(11) For the monitoring/record keeping requirements for the catalytic oxidizer, see 6.a)(1) through (5) in Section B: Facility-Wide Terms and Conditions.

(12) The CAM plan for the emissions units listed above has been developed for VOC emissions. The CAM performance indicators for the catalytic oxidizer controlling the emissions unit listed above include the average temperature of the exhaust gases immediately before the catalyst bed, the average temperature difference across the catalyst bed, an indicator of flow of the emission stations' exhaust, the catalyst activity testing, and an interlock system. When the performance indicators are operating outside the indicator ranges, the permittee shall take corrective action to restore operation of the emissions unit listed above and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions and complying with the reporting requirements specified in e) below. The emissions unit listed above and control equipment shall be run in accordance with the approved CAM Plan, or any approved revision of the Plan. In addition to monitoring the temperature of the exhaust gases immediately before the catalyst bed and an indicator of flow of the emission stations' exhaust of the emissions unit listed above, and testing of the catalyst activity, and operating an interlock system, the permittee also has an inspection/preventative maintenance program for the catalytic oxidizer. Based on the results of the inspection/preventative maintenance program, repairs to the catalytic oxidizer shall be made as needed. If the current CAM indicators and/or the catalytic oxidizer system inspection/preventative maintenance program are considered inadequate, the permittee will develop a Quality Improvement Plan.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Parts 64.6(d) and 64.7]

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports that identify any time periods when either of the emissions units listed above was in operation and the emissions from the emissions unit(s) were not vented to the catalytic oxidizer except for time periods when the emissions from the in-line lamination stations are vented to the atmosphere as allowed by c)(3) above and the emissions from the CI station and in-line print station for emissions unit K010 are vented to the catalytic oxidizer and the emissions from the CI station and the in-line flexo station for emissions unit K020 are vented to the catalytic oxidizer. Each report shall be submitted within 30 days after the deviation occurs.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

(2) The permittee shall submit quarterly (excursion) deviation reports that identify the following:

a. each time the interlock system does not stop the operation of the emissions units listed above when the catalytic oxidizer is not in operation and its use is necessary to be in compliance;

b. each time any bypass dampers, actuator pins, and/or associated motors are not in the correct position and in good operating condition and/or any of the hooding or ductwork comprising the VOC emission capture system contains leaks or holes that would permit the escape of the captured VOC emissions;

Note: It is not a deviation and does not need reported if an incorrect position does not cause excess emissions (i.e., emissions not required to be controlled are ducted to the catalytic oxidizer, station is not in use, etc.)

c. each time the findings of any inspection that determined the integrity of any ventilation fan has compromised the capture system. These reports shall include information required by 40 CFR Part 64.9(a);

d. each period of time, during operation of the emissions units listed above, when the air flow rate at the outlet of either emissions units was less than the acceptable value; and

e. each incident of deviation described in (d) where a prompt investigation was not conducted; where prompt corrective action was determined to be necessary and was not taken; or where proper records were not maintained for the investigation and/or the corrective action.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-77-07(C)(1), and 40 CFR Part 64.9(a)]

(3) The permittee shall submit annual reports that specify the results of each annual inspection of the electronics of the ventilation fan interlock systems and the catalytic oxidizer interlock system, based on the records maintained pursuant to d)(5) above. These reports shall be submitted within 45 days after each inspection is performed.

[Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-77-07(C)(1), and 40 CFR Part 64.9(a)]

(4) For the reporting requirements for the catalytic oxidizer, see 6.b)(1) through (4) in Section B: Facility-Wide Terms and Conditions.

f) Testing Requirements

(1) The permittee shall conduct, or have conducted, emission testing for the emissions units listed above in accordance with the following requirements:

a. Within 12 months after issuance of the PTI P0108338, if the data from the 1999 and 2005 stack tests is not sufficient to establish the operating parameter for demonstrating compliance with the capture efficiency limitation, then emission

testing shall have been conducted to demonstrate compliance with the capture efficiency limitation and to establish the appropriate operating parameter to ensure the capture efficiency in b)(1) above is maintained unless the specific station to be tested is not being operated (see b. below).

b. Any testing required by a. above may be delayed for stations that are not operated during the established testing time frame. In this case capture efficiency testing shall be conducted to demonstrate compliance with the capture efficiency limitation and to establish the appropriate operating parameter to ensure the capture efficiency in b)(1) within 6 months of the station again becoming operational.

c. The emission testing to demonstrate compliance with the 78 percent, by weight, capture efficiency limitation for VOC was conducted on January 27 and 28, 1999 for emissions unit K010 and to demonstrate compliance with the 90 percent, by weight, capture efficiency limitation for VOC was conducted on March 15, 2005 for emissions unit K020.

d. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

e. The test(s) shall be conducted while the emissions units are operating at or near their maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

f. During each capture efficiency test run, the permittee shall measure the air flow rate or rate indicator at the outlet of the emission stations for the emissions units listed above.

[Authority for term: OAC rule 3745-21-10(C), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(C)(1)]

(2) Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions units listed above operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

(3) Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions units listed above and the testing procedures provide a valid characterization of the emissions from the emissions units listed above and/or the performance of the control equipment.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

(4) A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

(5) For additional testing requirements for the catalytic oxidizer, see 6.c)(1) through 6.c)(5) in Section B: Facility-Wide Terms and Conditions.

(6) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations:

The emissions of VOC from emissions unit K010 which includes the CI station, in-line lamination, and in-line print station shall not exceed 222.0 pounds per hour.

The emissions of VOC from emissions unit K020 which includes the CI station, in-line lamination, and in-line flexo station shall not exceed 124.0 pounds per hour.

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitations above shall be determined by multiplying the maximum line speed in feet per minute by 60 minutes per hour times the maximum print/coat width in feet times the maximum pounds of VOC per ream times one ream per 3000 square feet times (1-X*).

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitations above in accordance with Methods 1-4 and 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

*"X" is the overall control efficiency for the emissions unit (the capture efficiency times the control (destruction) efficiency) required by the most stringent regulation.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

b. Emission Limitations:

The emissions of VOC from emissions unit K010 which includes the CI station, in-line lamination, and in-line print station shall not exceed 109 tons per year.

The emissions of VOC from emissions unit K020 which includes the CI station, in-line lamination, and in-line flexo station shall not exceed 109 tons per year.

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitations above shall be demonstrated through the record keeping requirements established in Section B – Facility-Wide Terms and Conditions and d)(10) above.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

c. Emission Limitations:

The VOC content of the coatings and inks employed shall not exceed forty percent VOC by volume of the coating and ink, excluding water and exempt solvents or twenty-five percent VOC by volume of the volatile matter in the coating and ink.

The VOC content of the coatings and inks employed shall not exceed 0.8 pound of VOC per pound of solids applied or 0.16 pound of VOC per pound of coating or ink applied

Applicable Compliance Method:

Compliance with the allowable VOC contents above shall be demonstrated through the record keeping requirements established in d)(8) above

OAC rule 3745-21-10(B). US EPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

[Authority for term: OAC rule 3745-21-10(B), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(C)(1)]

d. Emission Limitations:

For emissions unit K010: a capture system and associated control system which are designed and operated to achieve a control (destruction) efficiency which is at least 90 percent, by weight, and a capture efficiency which is at least 78 percent, by weight, for VOC.

For emissions unit K020: a capture system and associated control system which are designed and operated to achieve a control (destruction) efficiency which is at least 90 percent, by weight, and a capture efficiency which is at least 90 percent, by weight, for VOC.

Applicable Compliance Method:

Compliance with the allowable capture and control (destruction) efficiency limitations above shall be demonstrated based upon the results of emission testing conducted in accordance with the procedures and test methods as outlined in 6.c)(1) through 6.c)(5) in Section B: Facility-Wide Terms and Conditions and f)(1) above.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's 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 PTI 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 PTI.