State of Ohio Environmental Protection Agency

Street Address:
Lazarus Gov. Center
50 West Town Street, Suite 700
Columbus, OH 43215

**TELE:** (614) 644-3020 **FAX:** (614) 644-2329

Mailing Address:
Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

**RE: FINAL PERMIT TO INSTALL**
**CLERMONT COUNTY**
**Application No: 14-06029**
**Fac ID:** 1413020513

**DATE: 5/15/2008**

**CERTIFIED MAIL**

| | |
|---|---|
| | **TOXIC REVIEW** |
| | **PSD** |
| | **SYNTHETIC MINOR** |
| | **CEMS** |
| | **MACT** |
| | **NSPS** |
| | **NESHAPS** |
| | **NETTING** |
| | **MAJOR NON-ATTAINMENT** |
| | **MODELING SUBMITTED** |
| | **GASOLINE DISPENSING FACILITY** |

Multi-Color Corporation
Patrick Combs
4053 Clough Woods Drive 4053 Clough Woods Drive
Batavia, OH 45103

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

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

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: **USEPA** **HCDES**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

| | |
|---|---|
| **Permit To Install** | **Issue Date: 5/15/2008** |
| **Terms and Conditions** | **Effective Date: 5/15/2008** |

**FINAL PERMIT TO INSTALL 14-06029**

| | |
|---|---|
| Application Number: | 14-06029 |
| Facility ID: | 1413020513 |
| Permit Fee: | **$2000** |
| Name of Facility: | Multi-Color Corporation |
| Person to Contact: | Patrick Combs |
| Address: | 4053 Clough Woods Drive 4053 Clough Woods Drive<br>Batavia, OH 45103 |

Location of proposed air contaminant source(s) [emissions unit(s)]:
**4053 Clough Woods Drive**
**Batavia, OH 45103**, **Ohio**

Description of proposed emissions unit(s):
**This PTI application requests Chapter 31 modification for existing flexographic printing presses at the facility initially covered under Permit by rule.**

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

## Part I - GENERAL TERMS AND CONDITIONS

### A. Permit to Install General Terms and Conditions

#### 1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

#### 2. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (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.)

#### 3. Records Retention Requirements

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

#### 4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air

contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

**5. Scheduled Maintenance/Malfunction Reporting**

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

**6. Permit Transfers**

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

**7. Air Pollution Nuisance**

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

**8. Termination of Permit to Install**

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

**9. Construction of New Sources(s)**

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental

Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

**10. Public Disclosure**

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

**11. Applicability**

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

**12. Best Available Technology**

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

**13. Source Operation and Operating Permit Requirements After Completion of Construction**

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

**14. Construction Compliance Certification**

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

**15. 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. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

## B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

| Pollutant | Tons Per Year |
|---|---|
| VOC | 84.29 |

## PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

### A. Applicable Emissions Limitations and/or Control Requirements

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

**Operations, Property, and/or Equipment -(K001) - Mark Andy 2200 10-Unit No.1 Flexographic Printing Press**

| Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|
| OAC rule 3745-31-05(A)(3)(b) | See term and condition A.2.a |
| OAC rule 3745-21-09(Y)(2)(d) | See term and condition A.2.b |

**2. Additional Terms and Conditions**

**2.a** The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the total volatile organic compounds (VOCs) emissions from this air contaminant source since the total uncontrolled potential to emit for VOC emissions is less than ten tons per year.

**2.b** The total maximum usage of VOC in all coatings and inks employed in all flexographic, packaging rotogravure and publication rotogravure printing lines within the facility is less than one hundred tons per year considering the worst case scenario in terms of VOC content of coatings and cleanup materials, maximum hourly rate of coatings and cleanup materials application and assuming 8760 hours per year of operation.

### B. Operational Restrictions

None

### C. Monitoring and/or Recordkeeping Requirements

None

### D. Reporting Requirements

None



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## E. Testing Requirements

1. The USEPA methods 24 and 24A shall be used to determine the VOC content for coatings and cleanup materials. If pursuant to 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Methods 24 or 24A.

2. Compliance with the Applicable Emissions Limitations in Sections A.1 of these terms and conditions shall be determined in accordance with the following methods:

   a. <u>Emissions Limitation</u>

      The uncontrolled potential to emit VOC emissions from this air contaminant source is less than ten tons per year.

      <u>Application Compliance Method:</u>

      Emissions shall be calculated and compliance determined by using the following equations:

      [{(5.875 lbs of Water based ink per hour) (10% by wt. of VOC content) (8760 hours of operation per year) (1/2000 ton per pounds)}

      +

      {(0.06 gallons of Cleanup material per hour) (8760 hours of operation per year) (7.51 lbs/gal of VOC content) (1/2000 ton per pounds)

      = 4.54 tons of VOC per year

## F. Miscellaneous Requirements

None



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## PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

### A. Applicable Emissions Limitations and/or Control Requirements

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

**Operations, Property, and/or Equipment - (K002) - Mark Andy 2200 10-Unit No.2 Flexographic Printing Press**

| Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|
| OAC rule 3745-31-05(A)(3)(b) | See term and condition A.2.a. |
| OAC rule 3745-21-09(Y)(2)(d) | See term and condition A.2.b. |

**2. Additional Terms and Conditions**

**2.a** The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the total volatile organic compounds (VOCs) emissions from this air contaminant source since the total uncontrolled potential to emit for VOC emissions is less than ten tons per year.

**2.b** The total maximum usage of VOC in all coatings and inks employed in all flexographic, packaging rotogravure and publication rotogravure printing lines within the facility is less than one hundred tons per year considering the worst case scenario in terms of VOC content of coatings and cleanup materials, maximum hourly rate of coatings and cleanup materials application and assuming 8760 hours per year of operation.

### B. Operational Restrictions

None

### C. Monitoring and/or Recordkeeping Requirements

None

### D. Reporting Requirements

None



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## E. Testing Requirements

1. The USEPA methods 24 and 24A shall be used to determine the VOC content for coatings and cleanup materials. If pursuant to 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Methods 24 or 24A.

2. Compliance with the Applicable Emissions Limitations in Sections A.1 of these terms and conditions shall be determined in accordance with the following methods:

   a. <u>Emissions Limitation</u>

      The uncontrolled potential to emit VOC emissions from this air contaminant source is less than ten tons per year.

      <u>Application Compliance Method:</u>

      Emissions shall be calculated and compliance determined by using the following equations:

      [{(5.875 lbs of Water based ink per hour) (10% by wt. of VOC content) (8760 hours of operation per year) (1/2000 ton per pounds)}

      +

      {(0.06 gallons of Cleanup material per hour) (8760 hours of operation per year) (7.51 lbs/gal of VOC content) (1/2000 ton per pounds)

      = 4.54 tons of VOC per year

## F. Miscellaneous Requirements

None



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## PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

### A. Applicable Emissions Limitations and/or Control Requirements

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

**Operations, Property, and/or Equipment -(K003) - Mark Andy 2200 8-Unit Flexographic Printing Press**

| Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|
| OAC rule 3745-31-05(A)(3)(b) | See term and condition A.2.a. |
| OAC rule 3745-21-09(Y)(2)(d) | See term and condition A.2.b. |

**2. Additional Terms and Conditions**

**2.a** The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the total volatile organic compounds (VOCs) emissions from this air contaminant source since the total uncontrolled potential to emit for VOC emissions is less than ten tons per year.

**2.b** The total maximum usage of VOC in all coatings and inks employed in all flexographic, packaging rotogravure and publication rotogravure printing lines within the facility is less than one hundred tons per year considering the worst case scenario in terms of VOC content of coatings and cleanup materials, maximum hourly rate of coatings and cleanup materials application and assuming 8760 hours per year of operation.

### B. Operational Restrictions

None

### C. Monitoring and/or Recordkeeping Requirements

None

### D. Reporting Requirements

None



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## E. Testing Requirements

1. The USEPA methods 24 and 24A shall be used to determine the VOC content for coatings and cleanup materials. If pursuant to 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Methods 24 or 24A.

2. Compliance with the Applicable Emissions Limitations in Sections A.1 of these terms and conditions shall be determined in accordance with the following methods:

   a. <u>Emissions Limitation</u>

      The uncontrolled potential to emit VOC emissions from this air contaminant source is less than ten tons per year.

      <u>Application Compliance Method:</u>

      Emissions shall be calculated and compliance determined by using the following equations:

      [{(4.7 lbs of Water based ink per hour) (10% by wt. of VOC content) (8760 hours of operation per year) (1/2000 ton per pounds)}

      +

      {(0.05 gallons of Cleanup material per hour) (8760 hours of operation per year) (7.51 lbs/gal of VOC content) (1/2000 ton per pounds)

      = 3.70 tons of VOC per year

## F. Miscellaneous Requirements

None



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## PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

### A. Applicable Emissions Limitations and/or Control Requirements

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

**Operations, Property, and/or Equipment -(K004) - Omet VF520F1 10-Unit Flexographic Printing Press**

| Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|
| OAC rule 3745-31-05(A)(3) | Volatile Organic Compound (VOC) emissions shall not exceed 1.98 pounds per hour from coating usage only.<br><br>VOC emissions shall not exceed 11.30 tons per year including cleanup material usage.<br><br>See terms A.2.a, A2.b, A.2.c, A.2.d and B.1. |
| OAC rule 3745-21-09(Y)(2)(d) | See term A.2.e. |

**2. Additional Terms and Conditions**

**2.a** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by coating and cleanup material usage restrictions, the VOC content limitations and emissions limitations.

**2.b** The VOC content of each cleanup material shall not exceed 7.51 pounds of VOC per gallon.

**2.c** The VOC content of each coating, as applied, shall not exceed 10% VOC by weight of the coating.

**2.d** The hourly emissions limitations outlined for VOC are based upon the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with these limitations.

**2.e** The total maximum usage of VOC in all coatings and inks employed in all flexographic, packaging rotogravure and publication rotogravure printing lines within the facility is less than one hundred tons per year considering the worst case scenario in terms of VOC content of coatings and cleanup materials, maximum



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hourly rate of coatings and cleanup materials application and assuming 8760 hours per year of operation.

## B. Operational Restrictions

1. The maximum annual cleanup material usage for this emissions unit shall not exceed 700 gallons per year.

## C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for emissions unit K004:

   a. The name and identification number of each coating, as applied.

   b. The VOC content of each coating, as applied, in pounds per gallon.

   c. The volume of each coating employed, in gallons.

   d. The total volume of all coatings employed, in gallons.

   e. The name and identification number of each cleanup material employed.

   f. The VOC content of each cleanup material, in pounds per gallon.

   g. The volume of each cleanup material employed, in gallons.

   h. The total volume of all cleanup materials employed, in gallons.

   i. The total VOC emissions from all coatings employed (b x c).

   j. The total VOC emissions from all cleanup materials employed (f x g).

   k. The total VOC emissions from all coatings and cleanup materials employed, in pounds [(b xc) + (f x g)].

## D. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services of any annual record showing that emissions unit K004 employed more than the applicable maximum annual cleanup material usage limit outlined in Section B.1. A copy of such record shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurred. For each usage limit exceedance the permittee



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shall also identify if an exceedance of the applicable annual VOC emissions limit occurred.

2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncompliance coatings or cleanup materials (i.e. VOC contents). The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.

3. The permittee shall submit annual report which summarizes the following for this emissions unit:

   a. the total VOC emissions from the coatings and cleanup materials employed in this emissions unit for the previous calendar year; and

   b. the total number of gallons of coatings and cleanup materials employed in this emissions unit for the previous calendar year.

   The permittee shall submit the annual reports by January 31 of following year.

**E. Testing Requirements**

1. The USEPA methods 24 and 24A shall be used to determine the VOC content for coatings and cleanup materials. If pursuant to 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Methods 24 or 24A.

2. Compliance with the emissions limitations in Section A and usage limitations in Section B of these terms and conditions shall be determined in accordance with the following method(s):

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

      VOC emissions shall not exceed 1.98 pounds per hour from coating usage only.

      <u>Applicable Compliance Method:</u>

      The hourly VOC emissions limitation from coatings usage only was determined by the use of following equation:

      [(19.84 pounds of Water based inks per hour) (10% by wt. of VOC content)]



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= 1.98 pounds of VOC per hour.

b. Emissions Limitation:

VOC emissions shall not exceed 11.31 tons per year including cleanup materials usage.

Applicable Compliance Method:

The annual VOC emissions limitation including cleanup material usage also was determined by the use of following equation:

[{(19.84 pounds per hour of Water based inks) (10 % by wt. of VOC content) (8760 hours of operation per year) (1/2000 ton per pounds)}

+

{(700 gallons of Cleanup material usage per year) (7.51 pounds of VOC per gallon of Cleanup material) (1/2000 ton per pounds)}]

= 11.31 tons of VOC per year.

3. Compliance with the operational limitation in term and condition B.1 shall be demonstrated by the record keeping required in term and condition C.1.

## F. Miscellaneous Requirements

None



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## PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

### A. Applicable Emissions Limitations and/or Control Requirements

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

**Operations, Property, and/or Equipment - (K005) - Comco Commander 8-Unit Flexographic Printing Press**

| Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|
| OAC rule 3745-31-059A)(3)(b) | See term and condition A.2.a. |
| OAC rule 3745-21-09(Y)(2)(d) | See term and condition A.2.b. |

**2. Additional Terms and Conditions**

**2.a** The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the total volatile organic compounds (VOCs) emissions from this air contaminant source since the total uncontrolled potential to emit for VOC emissions is less than ten tons per year.

**2.b** The total maximum usage of VOC in all coatings and inks employed in all flexographic, packaging rotogravure and publication rotogravure printing lines within the facility is less than one hundred tons per year considering the worst case scenario in terms of VOC content of coatings and cleanup materials, maximum hourly rate of coatings and cleanup materials application and assuming 8760 hours per year of operation.

### B. Operational Restrictions

None

### C. Monitoring and/or Recordkeeping Requirements

None

### D. Reporting Requirements

None



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## E. Testing Requirements

1. The USEPA methods 24 and 24A shall be used to determine the VOC content for coatings and cleanup materials. If pursuant to 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Methods 24 or 24A.

2. Compliance with the Applicable Emissions Limitations in Sections A.1 of these terms and conditions shall be determined in accordance with the following methods:

   a. <u>Emissions Limitation</u>

      The uncontrolled potential to emit VOC emissions from this air contaminant source is less than ten tons per year.

      <u>Application Compliance Method:</u>

      Emissions shall be calculated and compliance determined by using the following equations:

      [{(12.5 lbs of UV Ink/coating/adhesive per hour) (1% by wt. of VOC content) (8760 hours of operation per year) (1/2000 ton per pounds)}

      +

      {(0.07 gallons of Cleanup material per hour) (8760 hours of operation per year) (7.51 lbs/gal of VOC content) (1/2000 ton per pounds)

      = 2.85 tons of VOC per year

## F. Miscellaneous Requirements

None



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## PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

### A. Applicable Emissions Limitations and/or Control Requirements

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

**Operations, Property, and/or Equipment - (K006) - Comco Commander 10-Unit Flexographic Printing Press**

| Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|
| OAC rule 3745-31-05(A)(3)(b) | See term and condition A.2.a. |
| OAC rule 3745-21-09(Y)(2)(d) | See term and condition A.2.b. |

**2. Additional Terms and Conditions**

**2.a** The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the total volatile organic compounds (VOCs) emissions from this air contaminant source since the total uncontrolled potential to emit for VOC emissions is less than ten tons per year.

**2.b** The total maximum usage of VOC in all coatings and inks employed in all flexographic, packaging rotogravure and publication rotogravure printing lines within the facility is less than one hundred tons per year considering the worst case scenario in terms of VOC content of coatings and cleanup materials, maximum hourly rate of coatings and cleanup materials application and assuming 8760 hours per year of operation.

### B. Operational Restrictions

None

### C. Monitoring and/or Recordkeeping Requirements

None

### D. Reporting Requirements

None



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## E. Testing Requirements

1. The USEPA methods 24 and 24A shall be used to determine the VOC content for coatings and cleanup materials. If pursuant to 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Methods 24 or 24A.

2. Compliance with the Applicable Emissions Limitations in Sections A.1 of these terms and conditions shall be determined in accordance with the following methods:

   a. <u>Emissions Limitation</u>

      The uncontrolled potential to emit VOC emissions from this air contaminant source is less than ten tons per year.

      <u>Application Compliance Method:</u>

      Emissions shall be calculated and compliance determined by using the following equations:

      [{(15.63 lbs of UV Ink/coating/adhesive per hour) (1% by wt. of VOC content) (8760 hours of operation per year) (1/2000 ton per pounds)}

      +

      {(0.08 gallons of Cleanup material per hour) (8760 hours of operation per year) (7.51 lbs/gal of VOC content) (1/2000 ton per pounds)

      = 3.31 tons of VOC per year

## F. Miscellaneous Requirements

None



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## PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

### A. Applicable Emissions Limitations and/or Control Requirements

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

**Operations, Property, and/or Equipment -(K007) - Omet VF670 12-Unit Flexographic Rotogravure Printing Press**

| Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|
| OAC rule 3745-31-05(A)(3) | Volatile Organic Compound (VOC) emissions shall not exceed 7.02 pounds per hour from coating usage only.<br><br>VOC emissions shall not exceed 33.90 tons per year including cleanup material usage.<br><br>See terms A.2.a, A.2.b, A.2.c, A. 2.d and B.1. |
| OAC rule 3745-21-09(Y)(2)(d) | See term A.2.e. |

**2. Additional Terms and Conditions**

**2.a** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by coating and cleanup material usage restrictions, the VOC content limitations and emissions limitations.

**2.b** The VOC content of each cleanup material shall not exceed 7.51 pounds of VOC per gallon.

**2.c** The VOC content of each coating, as applied, shall not exceed 90% VOC by weight of the coating.

**2.d** The hourly emissions limitations outlined for VOC are based upon the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with these limitations.

**2.e** The total maximum usage of VOC in all coatings and inks employed in all flexographic, packaging rotogravure and publication rotogravure printing lines within the facility is less than one hundred tons per year considering the worst case scenario in terms of VOC content of coatings and cleanup materials, maximum



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hourly rate of coatings and cleanup materials application and assuming 8760 hours per year of operation.

## B. Operational Restrictions

1. The maximum annual cleanup material usage for this emissions unit shall not exceed 840 gallons per year.

## C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for emissions unit K007:

   a. The name and identification number of each coating, as applied.

   b. The VOC content of each coating, as applied, in pounds per gallon.

   c. The volume of each coating employed, in gallons.

   d. The total volume of all coatings employed, in gallons.

   e. The name and identification number of each cleanup material employed.

   f. The VOC content of each cleanup material, in pounds per gallon.

   g. The volume of each cleanup material employed, in gallons.

   h. The total volume of all cleanup materials employed, in gallons.

   i. The total VOC emissions from all coatings employed (b x c).

   j. The total VOC emissions from all cleanup materials employed (f x g).

   k. The total VOC emissions from all coatings and cleanup materials employed, in pounds [(b xc) + (f x g)].

## D. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services of any annual record showing that emissions unit K007 employed more than the applicable maximum annual cleanup material usage limit outlined in Section B.1. A copy of such record shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurred. For each usage limit exceedance the permittee shall also identify if an exceedance of the applicable annual VOC emissions limit occurred.



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2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncompliance coatings or cleanup materials (i.e. VOC contents). The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.

3. The permittee shall submit annual report which summarizes the following for this emissions unit:

   a. the total VOC emissions from the coatings and cleanup materials employed in this emissions unit for the previous calendar year; and

   b. the total number of gallons of coatings and cleanup materials employed in this emissions unit for the previous calendar year.

   The permittee shall submit the annual reports by January 31 of the following year.

## E. Testing Requirements

1. The USEPA methods 24 and 24A shall be used to determine the VOC content for coatings and cleanup materials. If pursuant to 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Methods 24 or 24A.

2. Compliance with the emissions limitations in Section A and usage limitations in Section B of these terms and conditions shall be determined in accordance with the following method(s):

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

      VOC emissions shall not exceed 7.02 pounds per hour from coating usage only.

      <u>Applicable Compliance Method:</u>

      The hourly VOC emissions limitation from coatings usage only was determined by the use of following equation:

      [(7.8 pounds of Solvent based adhesive per hour) (90% by wt. of VOC content)]

      = 7.02 pounds of VOC per hour.



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b. Emissions Limitation:

VOC emissions shall not exceed 33.90 tons per year including cleanup materials usage.

Applicable Compliance Method:

The annual VOC emissions limitation including cleanup material usage also was determined by the use of following equation:

[{(7.8 pounds per hour of Solvent based adhesive) (90 % by wt. of VOC content) (8760 hours of operation per year) (1/2000 ton per pounds)}

+

{(840 gallons of Cleanup material usage per year) (7.51 pounds of VOC per gallon of Cleanup material) (1/2000 ton per pounds)}]

= 33.90 tons of VOC per year.

3. Compliance with the operational limitation in term and condition B.1 shall be demonstrated by the record keeping required in term and condition C.1.

## F. Miscellaneous Requirements

None



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## PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

### A. Applicable Emissions Limitations and/or Control Requirements

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

**Operations, Property, and/or Equipment -(P001) - Flexographic Plate-making System**

| Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|
| OAC rule 3745-31-05(A)(3)(b) | See term A.2.a. |

**2. Additional Terms and Conditions**

**2.a** The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the total volatile organic compounds (VOCs) emissions from this air contaminant source since the total uncontrolled potential to emit for VOC emissions is less than ten tons per year.

### B. Operational Restrictions

None

### C. Monitoring and/or Recordkeeping Requirements

None

### D. Reporting Requirements

None

### E. Testing Requirements

1. The USEPA methods 24 and 24A shall be used to determine the VOC content for coatings and cleanup materials. If pursuant to 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Methods 24 or 24A.



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2. Compliance with the Applicable Emissions Limitations in Sections A.1 of these terms and conditions shall be determined in accordance with the following methods:

   a. Emissions Limitation

   The uncontrolled potential to emit VOC emissions from this air contaminant source is less than ten tons per year.

   Application Compliance Method:

   Emissions shall be calculated and compliance determined by using the following equations:

   [{(0.15 gallon per hour of Processing solvent) (7.26 pounds of VOC per gallon of Processing solvent) (8760 hours of operation per year) (1/2000 ton per pounds)}

   +

   {(0.01 gallon per hour of Cleanup material) (8760 hours of operation per year) (7.51 pounds of VOC per gallon of cleanup material) (1/2000 ton per pounds)

   = 5.10 tons of VOC per year

## F. Miscellaneous Requirements

None



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## PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

### A. Applicable Emissions Limitations and/or Control Requirements

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

**Operations, Property, and/or Equipment - (R001) - Komori 7-Unit Sheetfed Offset Lithographic Printing Press No. 1 with Flexographic Coater**

| Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|
| OAC rule 3745-31-05(A)(3) | Volatile Organic Compound (VOC) emissions shall not exceed 0.74 pounds per hour from coating usage only.<br><br>VOC emissions shall not exceed 7.52 tons per year including cleanup material usage.<br><br>See terms A.2.a, A.2.b, A.2.c, A.2.d and B.1. |
| OAC rule 3745-21-09(Y)(2)(d) | See term A.2.e. |

**2. Additional Terms and Conditions**

**2.a** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by coating and cleanup material usage restrictions, the VOC content limitations and emissions limitations.

**2.b** The VOC content of each cleanup material shall not exceed 7.51 pounds of VOC per gallon.

**2.c** The VOC content of each coating, as applied, shall not exceed 7.4 pounds per gallon.

**2.d** The hourly emissions limitations outlines for VOC are based upon the emissions unit's potential to emit. Therefore, no records are required to demonstrate compliance with these limitations.

**2.e** The total maximum usage of VOC in all coatings and inks employed in all flexographic, packaging rotogravure and publication rotogravure printing lines within the facility is less than one hundred tons per year considering the worst case scenario in terms of VOC content of coatings and cleanup materials, maximum



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hourly rate of coatings and cleanup materials application and assuming 8760 hours per year of operation.

## B. Operational Restrictions

1. The maximum annual cleanup material usage for this emissions unit shall not exceed 1140 gallons per year.

## C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for emissions unit R001:

   a. The name and identification number of each coating, as applied.

   b. The VOC content of each coating, as applied, in pounds per gallon.

   c. The volume of each coating employed, in gallons.

   d. The total volume of all coatings employed, in gallons.

   e. The name and identification number of each cleanup material employed.

   f. The VOC content of each cleanup material, in pounds per gallon.

   g. The volume of each cleanup material employed, in gallons.

   h. The total volume of all cleanup materials employed, in gallons.

   i. The total VOC emissions from all coatings employed (b x c).

   j. The total VOC emissions from all cleanup materials employed (f x g).

   k. The total VOC emissions from all coatings and cleanup materials employed, in pounds [(b xc) + (f x g)].

## D. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services of any annual record showing that emissions unit R001 employed more than the applicable maximum annual cleanup material usage limit outlined in Section B.1. A copy of such record shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurred. For each usage limit exceedance the permittee



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shall also identify if an exceedance of the applicable daily or annual VOC emissions limit occurred.

2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncompliance coatings or cleanup materials (i.e. VOC contents). The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.

3. The permittee shall submit annual report which summarizes the following for this emissions unit:

   a. the total VOC emissions from the coatings and cleanup materials employed in this emissions unit for the previous calendar year; and

   b. the total number of gallons of coatings and cleanup materials employed in this emissions unit for the previous calendar year.

   The permittee shall submit the annual reports by January 31 of following year.

## E. Testing Requirements

1. The USEPA methods 24 and 24A shall be used to determine the VOC content for coatings and cleanup materials. If pursuant to 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Methods 24 or 24A.

2. Compliance with the emissions limitations in Section A and usage limitations in Section B of these terms and conditions shall be determined in accordance with the following method(s):

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

      VOC emissions shall not exceed 0.74 pounds per hour from coating usage only.

      <u>Applicable Compliance Method:</u>

      The hourly VOC emissions limitation from coatings usage only was determined by the use of following equation:



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[(0.1 gallon of Fountain solution alcohol substitute per hour) (7.4 pounds of VOC per gallon)]

= 0.74 pounds of VOC per hour.

b. Emissions Limitation:

VOC emissions shall not exceed 7.52 tons per year including cleanup materials usage.

Applicable Compliance Method:

The annual VOC emissions limitation including cleanup material usage was determined by the use of following equation:

[{(0.1 gallon of Fountain solution alcohol substitute per hour) (7.4 pounds of VOC per gallon of Fountain solution alcohol substitute) (8760 hours per year of operation) (1/2000 ton per pounds)}

+

{(1140 gallons per year of Cleanup material) (7.51 pounds of VOC per gallon of Cleanup material) (1/2000 ton per pounds)}]

= 7.52 tons of VOC per year.

3. Compliance with the operational limitation in term and condition B.1 shall be demonstrated by the record keeping required in term and condition C.1.

## F. Miscellaneous Requirements

None



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## PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

### A. Applicable Emissions Limitations and/or Control Requirements

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

**Operations, Property, and/or Equipment -(R002) - Komori 7-Unit Sheetfed Offset Lithographic Printing Press No. 2 with Flexographic Coater**

| Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|
| OAC rule 3745-31-05(A)(3) | Volatile Organic Compound (VOC) emissions shall not exceed 0.74 pounds per hour from coating usage only.<br><br>VOC emissions shall not exceed 7.52 tons per year including cleanup material usage.<br><br>See terms A.2.a, A.2.b, A.2.c, A.2.d and B.1. |
| OAC rule 3745-21-09(Y)(2)(d) | See term A.2.e. |

**2. Additional Terms and Conditions**

**2.a** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by coating and cleanup material usage restrictions, the VOC content limitations and emissions limitations.

**2.b** The VOC content of each cleanup material shall not exceed 7.51 pounds of VOC per gallon.

**2.c** The VOC content of each coating, as applied, shall not exceed 7.4 pounds per gallon.

**2.d** The hourly emissions limitations outlines for VOC are based upon the emissions unit's potential to emit. Therefore, no records are required to demonstrate compliance with these limitations.

**2.e** The total maximum usage of VOC in all coatings and inks employed in all flexographic, packaging rotogravure and publication rotogravure printing lines within the facility is less than one hundred tons per year considering the worst case scenario in terms of VOC content of coatings and cleanup materials, maximum



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hourly rate of coatings and cleanup materials application and assuming 8760 hours per year of operation.

## B. Operational Restrictions

1. The maximum annual cleanup material usage for this emissions unit shall not exceed 1140 gallons per year.

## C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for emissions unit R002:

   a. The name and identification number of each coating, as applied.

   b. The VOC content of each coating, as applied, in pounds per gallon.

   c. The volume of each coating employed, in gallons.

   d. The total volume of all coatings employed, in gallons.

   e. The name and identification number of each cleanup material employed.

   f. The VOC content of each cleanup material, in pounds per gallon.

   g. The volume of each cleanup material employed, in gallons.

   h. The total volume of all cleanup materials employed, in gallons.

   i. The total VOC emissions from all coatings employed (b x c).

   j. The total VOC emissions from all cleanup materials employed (f x g).

   k. The total VOC emissions from all coatings and cleanup materials employed, in pounds [(b xc) + (f x g)].

## D. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services of any annual record showing that emissions unit R002 employed more than the applicable maximum annual cleanup material usage limit outlined in Section B.1. A copy of such record shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurred. For each usage limit exceedance the permittee



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shall also identify if an exceedance of the applicable daily or annual VOC emissions limit occurred.

2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncompliance coatings or cleanup materials (i.e. VOC contents). The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.

3. The permittee shall submit annual report which summarizes the following for this emissions unit:

   a. the total VOC emissions from the coatings and cleanup materials employed in this emissions unit for the previous calendar year; and

   b. the total number of gallons of coatings and cleanup materials employed in this emissions unit for the previous calendar year.

   The permittee shall submit the annual reports by January 31 of following year.

## E. Testing Requirements

1. The USEPA methods 24 and 24A shall be used to determine the VOC content for coatings and cleanup materials. If pursuant to 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Methods 24 or 24A.

2. Compliance with the emissions limitations in Section A and usage limitations in Section B of these terms and conditions shall be determined in accordance with the following method(s):

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

      VOC emissions shall not exceed 0.74 pounds per hour from coating usage only.

      <u>Applicable Compliance Method:</u>

      The hourly VOC emissions limitation from coatings usage only was determined by the use of following equation:



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[(0.1 gallon of Fountain solution alcohol substitute per hour) (7.4 pounds of VOC per gallon)]

= 0.74 pounds of VOC per hour.

b. Emissions Limitation:

VOC emissions shall not exceed 7.52 tons per year including cleanup materials usage.

Applicable Compliance Method:

The annual VOC emissions limitation including cleanup material usage was determined by the use of following equation:

[{(0.1 gallon of Fountain solution alcohol substitute per hour) (7.4 pounds of VOC per gallon of Fountain solution alcohol substitute) (8760 hours per year of operation) (1/2000 ton per pounds)}

+

{(1140 gallons per year of Cleanup material) (7.51 pounds of VOC per gallon of Cleanup material) (1/2000 ton per pounds)}]

= 7.52 tons of VOC per year.

3. Compliance with the operational limitation in term and condition B.1 shall be demonstrated by the record keeping required in term and condition C.1.

## F. Miscellaneous Requirements

None



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