



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
COLUMBIANA COUNTY
Application No: 02-22890
Fac ID: 0215090342**

CERTIFIED MAIL

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

DATE: 12/27/2007

Salem Label
Ed Shadle
1472 Salem Parkway
Salem, OH 44460

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

NEDO



Permit To Install
Terms and Conditions

Issue Date: 12/27/2007
Effective Date: 12/27/2007

FINAL PERMIT TO INSTALL 02-22890

Application Number: 02-22890
Facility ID: 0215090342
Permit Fee: **\$200**
Name of Facility: Salem Label
Person to Contact: Ed Shadle
Address: 1472 Salem Parkway
Salem, OH 44460

Location of proposed air contaminant source(s) [emissions unit(s)]:
1472 Salem Parkway
Columbiana, Ohio

Description of proposed emissions unit(s):
Press 702 - 20 inch, 8 color AquaFlex - Chromas Press.

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	8.0

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 - (K011) - Flexographic Printing Press No. 702 (20 inch - 8 color AquaFlex - Chromas Press)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-02(A)(2)	VOC emissions shall not exceed 8.0 tons per year.
OAC rule 3745-21-09(Y)(1)(a)(i)	VOC content of each coating and ink not to exceed 40 percent VOC by volume of the coating and ink, excluding water and exempt solvents, as applied.
40 CFR Part 63, Subpart KK	See sections A.2.a through A.2.e.

2. Additional Terms and Conditions

- 2.a "Wide-web flexographic press" is defined in section 63.822 of Subpart KK as a flexographic press capable of printing substrates greater than 18 inches in width. This emissions unit qualifies as a wide-web flexographic press.
- 2.b The permittee has chosen to commit to, and to meet the following criteria from 40 CFR 63.820(a)(2)(i) & (ii) for the purposes of establishing the facility to be an area source of hazardous air pollutants (HAPs) as defined in 40 CFR 63.2:
 - i. Use less than 9.1 Mg (10 tons) per each rolling 12-month period of each HAP at the facility, including materials used for source categories (includes wide-web flexographic presses), or purposes other than printing and publishing (Single HAP emissions from the facility will be kept below 10 tons per rolling 12-month period), and
 - ii. Use less than 22.7 Mg (25 tons) per each rolling 12-month period of any combination of HAPs at the facility, including materials used for source categories or purposes other than printing and publishing. (Combined HAP emissions from the facility will be kept below 25 tons per rolling 12-month period).

- 2.c** Per 40 CFR 63.820(a)(4), the following material may be excluded for HAP usage:
- i. Used in routing janitorial or facility grounds maintenance;
 - ii. Personal uses by employees or other persons;
 - iii. The use of products for the purpose of maintaining electric, propane gasoline and diesel powered motor vehicles operated by the facility; and
 - iv. The use of HAP contained in intake water (used for processing or noncontact cooling) or intake air (whether used as compressed air or for combustion).
- 2.d** Per 40 CFR 63.820(a)(5), if the permittee subsequently exceeds either of the thresholds (as specified in section A.2.b of these terms and conditions) for any rolling 12-month period (without first obtaining and complying with other limits that keep its potential to emit HAP below major source levels), the facility shall be considered to be in violation of its commitment for that 12-month period and shall be a major source of HAP beginning the first month after the end of the 12-month period in which either of the HAP-use thresholds was exceeded. As a major source of HAP, the permittee shall be subject to the Title V requirements and the requirements of 40 CFR 63, Subpart KK as noted in section 63.820(a)(1), even if in subsequent 12-month periods the facility uses less HAP than the thresholds in section A.2.b of these terms and conditions.
- 2.e** If the facility, no longer being subject to section A.2.b of these terms and conditions, becomes a major source, the permittee must continue to comply with the HAP usage limitation as specified in section A.2.b of these terms and conditions until the facility is in compliance with all relevant requirements as specified in 40 CFR Part 63, Subpart KK.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for this emissions unit:
 - a. The name and identification number of each coating and ink, as applied.

- b. The VOC content of each coating and ink in percent VOC by volume of the coating and ink, excluding water and exempt solvents, as applied [calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{VOC,5}$].
2. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions:
 - a. The name and identification of each coating, ink, and cleanup material employed.
 - b. The VOC content of each coating, ink, and cleanup material, in percent VOC per by weight.
 - c. The number of pounds of each coating, ink, and cleanup material employed.
 - d. The VOC emissions from each coating, ink, and cleanup material employed, in pounds or tons (b x c).
 - e. The total VOC emissions from all coatings, inks, and cleanup materials, in tons per year.
3. Modeling to demonstrate compliance with ORC 3704.03(F)(4)(b) ["Review of New Sources of Air Toxics Emissions, Option A."] 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. OAC Chapter 3745-31 requires the permittee to apply for and obtain a new or modified permit to install 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 permit to install.
4. Per 40 CFR 63.829(d), the permittee shall collect and record the following information each month for all the presses at the facility to determine facility HAP emissions per rolling 12-month period.
 - a. The name and identification of each coating, ink, and cleanup material employed.
 - b. The HAP content of each coating, ink, and cleanup material, in percent HAP by weight.
 - c. The number of pounds of each coating, ink, and cleanup material employed.
 - d. The HAP emissions from each coating, ink, and cleanup material employed, in pounds or tons (b x c). If more than one HAP is present in a coating, ink and/or cleanup material employed, a calculation for each single HAP emission shall be performed.

- e. The total single HAP emissions from all coatings, inks, and cleanup materials, in tons per rolling 12-months.
- f. The total combined HAP emissions from all coating, inks, and cleanup materials, in tons per rolling 12-months.

D. Reporting Requirements

- 1. The permittee shall notify the Ohio EPA, Northeast District Office in writing of any monthly record showing the use of noncomplying coatings and inks. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Northeast District Office within 30 days following the end of the calendar month.
- 2. The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
- 3. Per 40 CFR 63.830(b)(1), the permittee shall submit an Initial Notification Report to the Ohio EPA Northeast District Office (DAPC, 2110 East Aurora Road, Twinsburg OH 44087), Ohio EPA Central Office (MACT Coordinator in DAPC, 122 S. Front St., Columbus OH 43215) and the U.S.EPA Region V Office (Chief of Air Enforcement and Compliance Assurance Branch, Mail Code AE-17J, 77 West Jackson, Chicago Illinois 60604) upon issuance of this permit. The Initial Notification Report shall include the following information:
 - (i) The name and address of the owner or operator;
 - (ii) The address (i.e., physical location) of the affected source;
 - (iii) An identification of the relevant standard, or other requirement, that is the basis of the notification and the source's compliance date;
 - (iv) A brief description of the nature, size, design, and method of operation of the source and an identification of the types of emission points within the affected source subject to the relevant standard and types of hazardous air pollutants emitted; and
 - (v) A statement of whether the affected source is a major source or an area source.

E. Testing Requirements

Compliance with the emission limitation in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):

- 1. Emission Limitation:
VOC content of each coating and ink not to exceed 40 percent VOC by volume of the coating or ink, excluding water and exempt solvents, as applied.

Salem Label

PTI Application: 02-22890

Issued: 12/27/2007

Facility ID: 0215090342

Emissions Unit ID: K011

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section C.1. Formulation data or USEPA Method 24A shall be used to determine the VOC contents of the coatings.

2. Emission Limitation:

8.0 tons per year of VOC emissions

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section C.2.

F. Miscellaneous Requirements

1. The terms and conditions contained in this permit-to-install are federally enforceable.

Salem Label

PTI Application: 02-22890

Issued: 12/27/2007

Facility ID:

0215090342

IDENTIFY THE AIR CONTAMINANTS: _____